Planning and Environmental Appeals Division

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Our ref: LDP-230-2

30 June 2016

Dear Ben

PROPOSED EDINBURGH LOCAL DEVELOPMENT PLAN
THE TOWN AND COUNTRY PLANNING (DEVELOPMENT PLANNING) (SCOTLAND) REGULATIONS 2008
SUBMISSION OF THE REPORT OF THE EXAMINATION

We refer to our appointment by the Scottish Ministers to conduct the examination of the above plan. Before carrying out the examination into the issues raised in representations, we assessed the council's conformity with its participation statement under Section 19(4) of the Town and Country Planning (Scotland) Act 1997 (as amended). We concluded that the council's consultation and engagement procedures for the local development plan did conform to the participation statement. Having satisfied ourselves of that, our examination of the plan began in July 2015. We have now completed that examination and we enclose our report.

In our examination, we considered all 24 issues arising from 4168 unresolved representations which were identified by the council. In each case, we have taken account of the original representations, as well as the council's summaries of the representations and the council's responses. We have set out our conclusions and recommendations in relation to each issue in our report.

The examination process also included a comprehensive series of unaccompanied site inspections and, for some issues we requested additional information from the council and other parties.

Hearing sessions were held on the 18 and 19 November 2016. The first was on housing land supply matters and the second focussed on infrastructure delivery particularly in relation to transport and education. Matters relevant to the key themes of the examination and as discussed at the hearing are drawn together through Issue 5 on Housing and Community Facilities (including land supply matters).

Subject to the limited exceptions as set out in Section 19 of the Town and Country Planning (Scotland) Act 1997 (as amended) and in the Town and Country Planning (Grounds for Declining to Follow Recommendations) (Scotland) Regulations 2009,

the council is now required to make the modifications to the plan as set out in our recommendations.

The council should also make any consequential modifications to the text or maps which arise from these modifications. Separately, the council will require to make any necessary adjustments to the final environmental report and to the report on the appropriate assessment of the plan.

A letter will be issued to all those who submitted representations to inform them that the examination has been completed and that the report has been submitted to the council. It will advise them that the report is now available to view at the DPEA website at:

- on the DPEA web site at

  http://www.dpea.scotland.gov.uk/CaseDetails.aspx?id=115816

- and at the council's office at Planning Reception, Waverley Court, 4 East Market Street, Edinburgh, EH8 8BG and that it will also be posted on the council's website at:

  www.edinburgh.gov.uk/localdevelopmentplan;

The documents relating to the examination should be retained on the council's website for a period of six weeks following the adoption of the plan by the authority.

It would also be helpful to know when the plan has been adopted and would appreciate being sent confirmation of this in due course.

Yours sincerely

Allison Coard	*Richard Bowden*	*Lance Guilford*
REPORTER	REPORTER	REPORTER

Planning and Environmental Appeals Division

The Scottish Government

REPORT TO THE CITY OF EDINBURGH COUNCIL

PROPOSED EDINBURGH LOCAL DEVELOPMENT PLAN EXAMINATION

Reporters: Allison Coard MA MPhil MRTPI
Richard Bowden BSc (Hons) M.Phil MRTPI
Lance R Guilford DipTP MRTPI

Date of Report: 30 June 2016

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Note: SDA – Strategic Development Area

Edinburgh Local Development Plan

Examination of conformity with the participation statement

Introduction

1. Section 19(4) of the Town and Country Planning (Scotland) Act 1997 (as amended) requires the persons appointed by Scottish Ministers to examine the plan: "firstly to examine…the extent to which the planning authority's actings with regard to consultation and the involvement of the public at large as respects the proposed plan have conformed with (or have been beyond the requirements of) the participation statement of the authority which was current when the proposed plan was published under section 18(1)a."

Considerations

2. The current participation statement is contained within the City of Edinburgh Council's Development Plan Scheme dated June 2014 (Core Document 20). Page 9 of this document sets out how the council intended to engage with the public and other stakeholders for the Second Proposed Plan. Other sections of the report detail the consultation that was already carried out at the main issues stage and in relation to publication of the first proposed plan in 2013. The council's intentions and its subsequent actions are set out in Table 1 below. The second column details the actions that the council carried out as summarised from its Report of Conformity with its Participation Statement; May 2015.

Table 1: Comparison of the authority's current Participation Statement with its Statement of Conformity.

Summary of Current Participation Statement June 2014	**Summary of Council's Statement of Conformity with the Participation Statement; May 2015**
Notify everyone who submitted responses to the first Proposed Local Development Plan(LDP) or the Main Issues Report of when that period will start.	Notified all those who submitted responses to the Proposed Plan and the Main Issues Report and others on our mailing list about the Proposed Plan. Mailshot involved over 500 letters and 1,700 emails. Period ran for 6 weeks from 23 August to 3 October.
Notify properties neighbouring the proposals in the revised LDP in the way required by legislation	Notified people living close to new proposal sites in the way required by legislation. Notification mailshot involved over 12,500 letters.
Copies of the revised LDP and its supporting documents will be sent to Community Councils and groups and placed in libraries and in the Council's planning reception.	Provided paper copies of the Proposed Plan and supporting documents to community councils and groups and placed in public libraries and the Council's Planning Reception. Documents include: • Second Proposed Action Programme •Environmental Report – Second Revision •Housing Land Study •Revised Education Appraisal

	•Transport Appraisal – Addendum • Revised draft Habitats Regulation Appraisal (web only) •Equalities and Rights Impact Assessment update (web only)
All documents will also be published online, in advance of the formal start date if possible.	All documents were provided online along with details of drop-in events by 23 August 2014, the start of the representation period.
Drop-in sessions to help the public understand the Second Proposed Plan and how they can make representations if they wish	Ran drop-in sessions to help the public understand the Proposed LDP and how they could make representations if they wished. These were: North West Edinburgh, Rosebery Hall, Queensferry, 26 August, 3.30-6.45pm West Edinburgh, Drumbrae Library Hub, 28 August, 4 - 7pm South East Edinburgh, Kings Manor Hotel, Milton Road, 1st September, 4-7pm South West Edinburgh, Gibson Craig Hall, Currie, 3 September, 4-7pm South East Edinburgh, Faith Mission Hall, Gilmerton, 4 September, 4 - 7pm General session, Urban Room, Waverley Court, East Market Street, 22 September, 4-7 pm Feedback surveys were collected at each event.

3. From the council's submissions as summarised above we are content that the council carried through its intentions as expressed in its most recent participation statement.

Reporters' Conclusion

4. Consequently, as conformity with the current participation statement is demonstrated, we can proceed to examine the issues raised in representations to the proposed plan.

Issue 1	**Introduction and Aims and Strategy**	
Development plan reference:	**Part 1 Section 1** **Figure 1**	**Reporter:** Allison Coard

Body or person(s) submitting a representation raising the issue (including reference number):

0246 Hopetoun Estate Trust/Aithrie Estates
0278 Richard Owen
0624 South West (Edinburgh) Communities Forum
0649 Helen Campbell
0652 Margaret Collins
0685 Cala Management Ltd
0698 David Wilson Homes and J & J Muir
0749 Cramond and Harthill Estates
0851 Kate Dewar
1048 Swanston Farms Ltd
1170 A J C Clark
2006 Liberton & District Community Council
2093 Aldi Stores Ltd
2126 Cockburn Association
2196 Jeni Rowe
2246 Mactaggart and Mickel (Homes) Ltd
2268 TIAA Henderson Real Estates
2280 Mr and Mrs Philip and Barratt David Wilson Homes
2354 Grange/Prestonfield Community Council
2443 The University of Edinburgh
2537 Alan Simpson
2567 Community Land Advisory Service
2572 Royal Bank of Scotland

Provision of the development plan to which the issue relates:	The section of the Plan sets out its aims and strategy. It includes Figure 1, which summarises the Plan's spatial strategy. This section also introduces reference to the four strategic development areas identified in the Strategic Development Plan and used to prepare the LDP.

Planning authority's summary of the representation(s):

CONTEXT

The Main Issues Report set out the main priorities for the LDP and consulted on five interlinked aims, and the Plan's role in balancing these aims.

National Planning Framework 3/Scottish Planning Policy

- The function of 'key elements of the green belt' as outlined in paragraph 15 is not to control the outward growth of the city. This is not the function of the green belts detailed in Scottish Planning Policy. **(0698 David Wilson Homes and J & J Muir)**
- The Plan refers to Scottish Planning Policy published in 2010 and National Planning Framework 2. The Plan should be updated to take account of the requirements set out in National Planning Framework 3 and Scottish Planning Policy published in June 2014. **(0246 Hopetoun Estate Trust/Aithrie Estates; 0698 David Wilson Homes and J & J Muir; 0685 Cala Management Ltd)** Specifically this should be done in terms of the presumption in favour of sustainable economic development, well designed and sustainable places and the need to identify sufficient land for development in full. **(0685 Cala Management Ltd)** Land at East Ratho will contribute to meeting the aims of National Planning Framework 3 in the provision of housing for Edinburgh. **(0698 David Wilson**

Homes and J & J Muir)

Sustainable Development

- Requests the definition of Sustainable Development in the glossary to be that of the United Nations. **(1170 A J C Clark)**
- The Strategic Development Plan's vision statement should be redrafted based on the principles of Sustainable Development. A reasonable balance must be sought between the requirements of growth and those of the environment. Equal weight should be given to all the elements of the UK Shared Framework for Sustainable Development. **(2126 Cockburn Association)**

Strategic Development Areas and Figure 1

- Figure 1 LDP Spatial Strategy Summary Map does not outline the Strategic Development Areas. **(0624 South West Edinburgh Communities Forum; 0278 Richard Owen; 1170 A J C Clark; 2354 Grange/Prestonfield Community Council)**
- The Plan does not set out what Strategic Development Areas are, how policies may be different or differently applied in these areas compared with other parts of the city. The definition of a Strategic Development Area is not provided in the Glossary, including who defines Strategic Development Areas, their function and the legislation that requires Local Authorities to define them. The West Edinburgh Strategic Development Area includes prime agricultural land and established green belt. **(0624 South West Edinburgh Communities Forum; 1170 A J C Clark; 2354 Grange/Prestonfield Community Council)**
- The present West Edinburgh Strategic Development Area boundaries shown in the Plan are conceptually/ diagrammatically drawn and should be amended. **(2126 Cockburn Association)**
- The South East Edinburgh Strategic Development Area should be revised as it covers areas of established green belt which should be protected from development. **(2006 Liberton & District Community Council)**
- The South East Edinburgh Strategic Development Area boundary has been moved to the edge of Braid Hills Golf Course. Supports the continuation of the wedge bounded by Liberton Drive, Alnwickhill Road and Standykehead as Green Belt. The Boundary should be Alnwickhill Road to allow the area to remain open and views retained. **(0649 Helen Campbell, 0652 Margaret Collins)**
- The Strategic Development Area boundary on the South East Edinburgh Overview Map (Figure 14) includes areas that should not be considered for development such as Craigmillar Park Conservation Area, open space and protected playing field at East Suffolk Road, Crawfurd Road and the Quadrangle at East Suffolk Halls. **(0851 Kate Dewar; 2537 Allen Simpson)**
- The Strategic Development Area boundary includes green belt on the edge of Liberton. The representation supports the protection of these fields as green belt, and the Strategic Development Area boundary should be moved to reflect this. **(2196 Jeni Rowe)**
- The South East Strategic Development Area should be redrawn in accordance with the boundary as outlined in the Strategic Development Plan and the Main Issues Report, and shown on Figure 1 and the Proposals Map. This should include land at West of Liberton Brae and North of Liberton Drive. **(2246 Mactaggart and Mickel)**

- Supports allocation of land in the West Edinburgh Strategic Development Area in relation to SDP strategic housing land requirements, greenbelt objectives, and enhancement of green network. **(0749 Cramond and Harthill Estate)**

General

- Suggests a number of technical changes to the Plan. **(1170 A J C Clark)**
- The policies and proposals of the Plan should reflect the contribution that well - managed higher education establishments can make to the city economy. **(2443 The University of Edinburgh)**
- The Plan's Aims should reflect Edible Edinburgh's Sustainable Local Food Plan and promote local and community food production and consumption. **(2567 Community Land Advisory Service)**
- Support the general aims and strategy of the Plan. **(2093 Aldi Stores Ltd; 2268 TIAA Henderson Real Estates; 2572 Royal Bank of Scotland)**

Site specific matters

- Figure 1 should include Land East of Ratho as part of the West Edinburgh Strategic Development Area. The land is a clear and logical location for strategic growth. Representation is lodged to the Council loading development into Core Development Areas, as identified by the outdated Edinburgh and Lothians Structure Plan, which have only delivered limited housing completions and are heavily reliant on major infrastructure such as schools. The Plan needs to provide a range and choice of housing sites and Ratho presents an opportunity on an infrastructure led rather than dependent basis. Paragraph 5 states that the Plan cannot make development happen. This is not the case as in a plan-led system, it is the Plan and its allocation that directs, and in this case restricts future growth. The Plan, as outlined in paragraph 13, does not support Edinburgh's role as Scotland's capital city as it does not meet the needs of the city in full. It will be necessary to release further green belt land, e.g. east Ratho to meet the current five year effective land supply requirement failure. The Plan is not visionary as its housing land requirements are deficient. **(0698 David Wilson Homes and J & J Muir)**
- The green belt boundary should be adjusted to remove Currievale and Currievale East from the green belt for housing and associated uses. **(0685 CALA Management Ltd)**
- Cockburn Crescent, Balerno has not been included as a deliverable housing site within the Plan and on the Spatial Strategy Map (Figure 1). **(2280 Mr and Mrs Philip and Barratt David Wilson Homes)**
- The proposed Swanston Adventure Centre will meet the aims and strategy of the LDP in terms of growth of the city economy, sustainable transport, looking after the environment and creating strong sustainable communities. **(1048 Swanston Farms Ltd)**

Modifications sought by those submitting representations:

National Planning Framework 3/Scottish Planning Policy

- All references to Scottish Planning Policy and National Planning Framework 2 should be updated to the new Scottish Planning Policy and National Planning

Framework 3. **(0246 Hopetoun Estate Trust / Aithrie Estates; 0685 Cala Management Ltd; 0698 David Wilson Homes and J & J Muir)**

Sustainable Development

- The definition of Sustainable Development in the Plan's Glossary should be replaced by 'sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs'. **(1170 A J C Clark)**
- Redraft Strategic Development Plan vision in paragraph 7 to read: 'By 2032, the Edinburgh City Region continues to be internationally recognised as an outstanding area in which to live, work and do business. It is a place where growth is based on recognised principles for high quality sustainable development, its natural and cultural heritage assets are valued, includes measures to mitigate climate change and its peoples are healthier and have a proper say in their futures.'

Amend paragraph following SDP vision to read: '...key challenges – climate change, demographic change and sustainable development, based on the balanced principles of the UK Shared Framework for Sustainable Development'. **(2126 Cockburn Association)**

Aims

- Amend paragraph 11 as follows:
    - Aim 1 to read 'support the growth of the city economy, without endangering its cultural and natural heritage assets'.
    - Aim 2 replace with new sentences to read 'carefully monitor the number of houses to be provided by Edinburgh and adjust this, up or down, as firm evidence indicates. And also improve the quality of new homes being built'.
    - Aim 4 to read 'protect and improve our environment, including good agricultural land for home grown food production, for future generations in a changing climate'.
    - In final sentence after Aims replace 'maximise', with 'optimise'. **(2126 Cockburn Association)**

Strategic Development Areas (SDAs) and Figure 1

- Define Strategic Development Area in the glossary. The SDAs should be outlined on Figure1 in the LDP. **(0624 South West Edinburgh Communities Forum; 0278 Richard Owen; 2354 Grange/Prestonfield Community Council)**
- The Strategic Development Areas should be shown on Figure 1. Revise the West Strategic Development Area as shown on attached plan. **(1170 A J C Clark)**
- The Strategic Development Area boundary should be revised to align with the A701 to Lady Road to where the A701 meets the city bypass. **(2006 Liberton & District Community Council)**
- Redefine the boundaries of the West Edinburgh Strategic Development Area to exclude areas of high quality green belt, good agricultural land and areas of importance for flood management. **(2126 Cockburn Association)**
- Move the Strategic Development Area boundary to Alnwickhill Road on the South East Edinburgh Overview Map (Figure 14). **(0649 Helen Campbell; 0652**

Margaret Collins)

- Amend the Strategic Development Area boundary on the South East Edinburgh Overview Map (Figure 14) to exclude Craigmillar Park Conservation Area, open space and protected playing field at East Suffolk Road, Crawfurd Road and the Quadrangle at East Suffolk Halls. **(0851 Kate Dewar)**
- Move the Strategic Development Area boundary to existing edge of Liberton on the South East Edinburgh Overview Map (Figure 14). **(2196 Jeni Rowe)**
- Amend the Strategic Development Area boundary on the South East Edinburgh Overview Map (Figure 14) to exclude Craigmillar Park Conservation Area and LNCS and Special Landscape Area. **(2537 Allen Simpson)**
- The South East Strategic Development Area should be redrawn in accordance with the boundary as outlined in the SDP and the Main Issues Report, and shown on Figure 1 and the Proposals Map. This should include land at West of Liberton Brae and North of Liberton Drive. **(2246 Mactaggart and Mickel)**

General

- Insert list of scheduled ancient monuments, rights of way, listed buildings, designed landscapes, nature conservation sites, tree preservation orders, and an area profile. Insert list of tables at the front of document. Figure 11 is incorrectly referenced as Figure 12 in paragraph 106. **(1170 A J C Clark)**
- The Plan should explicitly 'support the growth of the city as a centre of learning and higher education.' **(2443 The University of Edinburgh)**
- The Plan should expressly support, promote and facilitate Edinburgh becoming a Sustainable Food City. (**2567 Community Land Advisory Service)**

Site specific

- Amend Figure 1 to include Land East of Ratho. Paragraph 5 should be amended to remove references to the Plan not making development happen. The Plan should be amended to include land at East Ratho to meet the Five year effective land supply requirement and support Edinburgh's role as Scotland's capital city as outlined in paragraph 13. Paragraph 96 should be amended - the Plan is not visionary. **(0698 David Wilson Homes and J & J Muir)**
- Amend Figure 1 to include sites at Currievale and Currievale East. **(0685 Cala Management Ltd)**
- Amend Figure 1 to include land at Cockburn Crescent, Balerno. **(2280 Mr and Mrs Philip and Barratt David Wilson Homes)**
- Include Swanston Adventure Centre in the Plan. **(1048 Swanston Farms Ltd)**

Summary of responses (including reasons) by planning authority:

National Planning Framework 3/Scottish Planning Policy

- Figure 1 identifies in dark green those elements of the green belt which specifically control the outward growth of the city. Paragraph 15 is not referring to the objectives of a green belt. These are provided in paragraph 34 and are consistent with Scottish Planning Policy paragraph 49 and SDP Policy 12. No modification proposed. **(0698 David Wilson Homes and J & J Muir)**
- The Plan takes full account of the provisions of National Planning Framework 3 and Scottish Planning Policy in its strategy, policies and proposals. The Plan's five

aims (paragraph 11) place sustainable development at its heart whilst supporting the growth of the city economy, increasing the number of and quality of new homes taking advantage of locations with good and proposed accessibility, protecting and enhancing Edinburgh's built and natural assets and creating strong communities. The Plan reflects Edinburgh's importance as a key driver of the Scottish economy in promoting seven 'special economic areas' and providing generous housing allocations as explained under Issue 5. Generally, the Plan's policies are worded positively, to support appropriate development and an unnecessarily prescriptive approach, for example to land use within the urban area, has generally been avoided. No modification proposed. **0246 Hopetoun Estate Trust/Aithrie Estates; 0698 David Wilson Homes and J & J Muir; 0685 Cala Management Ltd)**

Sustainable Development

- There are many definitions of 'sustainable development', The United Nations World Commission on Environment and Development report 'Our Common Future' or 'The Brundtland Report' definition from 1997, as referred to in the representation, is often referred to as the definitive. However, since 1997 it has become recognised that sustainable development is about more than just development or the environment. Accordingly, the Council's Sustainable Edinburgh 2020 strategy on page 4 highlights that to ensure a strong economy, a strong society is required, and both of these depend on a healthy environment. This also recognises the Scottish Government's support of sustainable economic growth and the presumption in favour of sustainable development. The definition of sustainable development in the Plan reflects this recognition. No modification proposed. **(1170 A J C Clark)**
- The Plan is consistent with the approved Strategic Development Plan and the vision set out in paragraph 9. No modification proposed. **(2126 Cockburn Association)**

Aims

- The aims set out within paragraph 11 reflect the challenge that decision makers using the Plan face in making difficult choices between competing priorities. The Aims are interlinked and each can have impacts, positive and negative on the other four. Aim 1 should be read in the context of the other four aims. Aim 2 recognises that the Plan must provide land for more houses to be built to conform to the SDP. With regards to replacing 'look after' with 'protect' Aim 4 and the use of 'maximise' instead of 'optimise' in paragraph 11, it should be noted that the Aims were consulted upon at the MIR stage and received broad support in the language used including from the representee. They have been written in plain English to reach a wide audience.

With regards to food production, Scottish Planning Policy paragraph 79 requires plans to safeguard land which is highly suitable for particular uses such as food production. As identified in the Environmental Report, Volume 1 page 19 and Figure 2, the majority of farmland in the area is classified as prime agricultural land. Such land constitutes much of the Edinburgh Green Belt. It is recognised in the Environmental Report pages 41-42 that the development of green field land will have a negative effect on the Strategic Environmental Assessment's soil objective. However, proposed development on prime agricultural land is supported by Scottish Planning Policy paragraph 80 where it is

essential as a component of the settlement strategy or to meet an established need. It is not the role of the planning authority to facilitate local access to private agricultural land, however the Council is engaging with the need to promote sustainable food through Edible Edinburgh: A Sustainable Food City Plan, one of the aims of which is to 'grow, produce and distribute food more locally while conserving and protecting our natural resources and environment'.

No modification proposed. **(2126 Cockburn Association)**

Strategic Development Areas and Figure 1

- The SDP identifies 13 strategic development areas as the main focus for growth (SDP Figure 1). A SESplan technical note – the Spatial Strategy Assessment (November 2011) – identified the new strategic development areas at West and South East Edinburgh (see SDP paragraph 19 and Appendix 1 Map 3 of the Spatial Strategy Assessment). The SDP also requires the Edinburgh LDP to define and maintain a green belt around Edinburgh (SDP Policy 12). In preparing the Plan, the Council has used the same boundaries of the strategic development areas as set out in the SDP Spatial Strategy Assessment. These boundaries can be seen on page 9 of the LDP's Main Issues Report and in more detail for West and South East Edinburgh in the Environmental Report (Volume 1, page 27 and Volume 2, pages 3 and 50). They can also be viewed as 'Other Information' on the LDP's interactive online version, which allows viewing at different scales. They are the source of the housing assessment areas which give Appendices 5 and 6 their structure.

The Strategic Development Area boundaries used by the Council are therefore taken unchanged from their original source and are publicly available. Their primary purpose has been to direct growth in the selection of sites to meet the SDP housing allocation. That process has resulted in the Plan's spatial strategy as summarised in Figure 1. That diagram also shows the areas within the strategic development areas which should be retained in the green belt and not identified for development. It shows where development should happen and where it should not, as required by paragraph 6 of Circular 6/2013. Superimposing the four strategic development area boundaries onto Figure 1 would introduce confusion and undermine the clarity of the Plan's spatial strategy.

No modification proposed.

(0278 Richard Owen; 0624 South West Edinburgh Communities Forum; 0649 Helen Campbell; 0652 Margaret Collins; 0851 Kate Dewar; 1170 A J C Clark; 2006 Liberton & District Community Council; 2126 Cockburn Association; 2196 Jeni Rowe; 2246 Mactaggart and Mickel; 2354 Grange/Prestonfield Community Council; 2537 Allen Simpson)

General

- LDPs are expected to be succinct documents (Circular 6/2013 paragraph 8). The additional information sought is all available in the public domain. Most of it is maintained by other agencies. All of it is subject to change during the Plan period. Its inclusion in the Plan would lengthen it unnecessarily with potentially out-of-date information. The LDP Monitoring Statement and Environmental Report set out the

survey information which informed the Plan's preparation. No modification proposed. The Council acknowledges that the reference to Figure 12 in paragraph 106 is incorrect. **(1170 A J C Clark)**

- Paragraph 56 of the Plan highlights that the strength of Edinburgh's economy is based on a range of key sectors, which include higher education. Higher education provision is provided across the city from a number of providers and it is not considered appropriate that the city centre should specifically be supported for growth in this sector. No modification proposed. **(2443 The University of Edinburgh)**
- Scottish Planning Policy in paragraph 79, final bullet, requires plans to safeguard land which is highly suitable for particular uses such as food production. As assessed within the Environmental Report, page 19 and Figure 2, the majority of farmland in the area is classified as prime agricultural land, with the majority being within the green belt. Prime agricultural land has been released for development where it has been identified as being essential as a component of the spatial strategy to meet an established need. It is not the role of the planning authority to facilitate local access to private agricultural land, however the Council is engaging with the need to promote sustainable food through its Edible Edinburgh Strategy, one of the aims of which is to 'grow, produce and distribute food more locally while conserving and protecting our natural resources and environment'. The Council also has an Allotments Strategy which aims to increase access to local food growing. No modification proposed. **(2567 Community Land Advisory Service)**

Site specific

- These sites have been assessed under Issue 16. Their allocation for development and release from the green belt is not supported and their location should not be identified on Figure 1. No modification proposed. **(0698 David Wilson Homes and J & J Muir; 0685 Cala Management Ltd; 2280 Mr and Mrs Philip and Barratt David Wilson Homes)**
- Representations seeking change to the Plan's provisions relating to Swanston Farm have been considered separately. The changes are not supported for the reasons explained in Issues 4 and 22. Figure 1 Spatial Strategy map should not be amended. No modification proposed. **(1048 Swanston Farms Ltd)**

Reporter's conclusions:

Scottish Planning Policy

1. Paragraph 49 of Scottish Planning Policy refers to green belt supporting the spatial strategy by:

- directing development to the most appropriate locations and supporting regeneration;
- protecting and enhancing the character, landscape setting and identity of the settlement; and
- protecting and providing access to open space.

2. Paragraph 15 and Figure 1 of the proposed plan imply a role of green belt in controlling the outward growth of the city. However when read in the context of the strategy and the regeneration objectives of the plan, I am content that this statement

provides a shorthand way of referring to the wider objectives of the green belt which are set out fully in paragraph 34. Consequently I do not consider any change is necessary.

3. References in the proposed plan to Scottish Planning Policy do not include a date (in paragraphs 17, 32, 35 and the glossary). I consider the references in the plan in relation to climate change and sustainable development, archaeology and development of national importance remain relevant in the context of current national policy.

National Planning Framework 3

4. I am not directed to any specific conflict with the current National Planning Framework which is referenced in paragraphs 48, 58 and the Glossary although I accept that this should now be correctly referenced as National Planning Framework 3 rather than 2. This is reflected in my recommendation. I consider that the objectives of sustainability and the role of Edinburgh in the delivery of housing and economic development are appropriately recognised through the plan.

5. The National Planning Framework recognises Strategic Airport Enhancements at Edinburgh Airport as National Development. The definition of national development includes enhancements to the airport but also its role as a hub for wider investment and business development. In this respect the definition of national development also applies to the proposed International Business Gateway.

6. National Development Status is also applied to new National Showground facilities south of the A8. The National Planning Framework states that areas adjacent to Edinburgh Airport have been identified for commercial and mixed uses supporting the economic development opportunities which are particularly suited to these locations. In setting an appropriate context for matters raised through Issue 20 my conclusion is that some amendment to the text in paragraph 58 is required to better demonstrate the relationship between the plan and National Planning Framework 3. My recommendations reflect this.

Sustainable Development

7. The glossary defines sustainable development as development that aims to minimise the impact of human activity on the environment as a whole, whilst supporting economic and social progress. Scottish Planning Policy reflects the “Brundtland Definition” from the World Commission on Environment and Development 1987. I accept the council’s view that consideration of social and economic progress are legitimate considerations. However, the council’s definition is in my view less clear as it does not refer to future generations. On balance, I consider it is more appropriate to include the internationally and nationally recognised definition used in Scottish Planning Policy. My recommendation reflects this.

8. The strategic vision is set out in paragraph 9 of the approved strategic plan- SESplan and cannot be altered through this examination. Chapter 1 of the Local Development Plan translates this into the aims and strategy of this local development plan and I find no conflict in this respect.

9. The changes suggested by the Cockburn Society seek to add specific reference to cultural/natural heritage and food production in paragraph 11. The aims of the proposed plan address economic growth, quality, accessibility and the environment which would

include climate change and protection of the built and natural heritage. Reference to sustainable and healthier communities also covers a range of considerations. Whilst this could include protection of agricultural land, I do not consider a specific reference to food production is required as this is less clearly an aim which the land use planning system can address. I note that the existing wording has been taken forward from the main issues stage and subject to consultation. I consider the existing text is sufficient to set out the main aims in a concise and easily understood way without the need for any change.

Strategic Development Areas

10. The term Strategic Development Area (SDA) is established in SESPlan where Figure 3 on page 16 shows West Edinburgh, South East Edinburgh, Edinburgh City Centre and Edinburgh Waterfront as the four SDA'S within the Regional Core Area. This map is indicative and Edinburgh council has interpreted it quite broadly through its Main Issues Report where for instance it includes sites in West Edinburgh to the south of the A8 and west of the bypass. Neither the strategic or proposed local development plan include any precise geographical definition.

11. Paragraph 18 of SESplan explains that SDA's are the primary locations for growth and investment. The proposed plan through table 3 and the proposals maps identifies the relevant land releases within these general areas. It does not attempt to define any wider or remaining area. One representation requests a definition of the Strategic Development Areas in the glossary and an explanation of their function and relevant legislation. However, there is no statutory or other requirement to define such areas. The relative roles of strategic and local plans are explained in Scottish Planning Policy and through Circular 6/2013 on development planning. The local development plan has a statutory requirement to be consistent with SESplan and its spatial strategy which seeks to guide development to appropriate locations.

12. The Strategic Development Areas are part of SESPlan's spatial strategy to inform the identification of specific sites through this local development plan. In turn the identification of these sites has implications in confirming the location of the green belt which is also shown in an indicative form through Figure 3 of SESplan. Policy Env 12 of SESplan confirms that it is for local plans to define green belt boundaries ensuring that the strategic growth requirements of the strategic development plan can be accommodated. Green belt designation applies the same degree of protection whether or not it is within a Strategic Development Area.

13. The local development plan moves from the broad area of search, identified through SESPlan as the focus of development, to the identification of specific sites within these general areas. Given that these general localities (the SDA'S) are the focus of investment they inevitably have some advantage in terms of important planning considerations such as accessibility to jobs and services. However, not all sites in these general areas will be suitable locations for development and each must be assessed on its merits in the same manner as sites in other locations throughout the city. The protection of agricultural land, green belt and the avoidance of areas of flood risk are some of a number of other considerations which apply to the identification of all sites including those identified in the context of the Strategic Development Areas. On the matter of agricultural land much of the land around Edinburgh is prime agricultural land and whilst its loss should be minimised Scottish Planning Policy recognises some loss may be justified to accommodate future development requirements.

14. My recommended changes through Policy Hou 1 (Issue 23) reflect the wording of SESplan Policy 7. This applies the same criteria to new sites which may come forward regardless of whether they are within or outwith a SDA. I find no consequent policy requirement to specifically define these areas on Figure 1 or elsewhere in the proposed plan. I consider that defining the boundary of these areas through the local development plan might imply they have some particular policy status presuming in favour of further development when in fact all additional sites would require to be assessed in the same context. Consequently, I consider it is sufficient that the local development plan through Figure 1 generally represents the grouping of sites which represent the main focus of strategic development allocations in the water-front, West and South East Areas of the city in accordance with the spatial strategy of SESPlan.

15. Other representations question why the boundary on the South East Edinburgh over-view map (Figure 14) has been moved and request it be redrawn at Alnwickhill Road and to protect the green belt in the Liberton Community Council area. Others question why it includes areas of open space and conservation areas and appears to cut through gardens and landscaped areas with particular reference to land identified as open space at Suffolk Road. Specific issues raised in relation to Suffolk Road are addressed through Issue 18. In any event, the red line on this map is not referenced and I do not consider it has any real function other than to encircle all the various sites in this area. It is not relevant to the application of any of the plan's policies. Consequently I do not find that any change is required.

General

16. As stated by the council, the local development plan should be as succinct as possible. Whilst I accept that information on Scheduled Ancient Monuments, Rights of Way and other designations are important in setting a context for the plan and are related to relevant policies I consider this detail it is more appropriately referenced elsewhere in other publically accessible documents. This approach allows information to be kept up to date and enable the local development plan, which is only renewed every five years, to focus on policies and proposals. With reference to the Swanston Adventure Centre I do not consider that this section of the plan should include references to the specific benefits of particular proposals even if these were to be recommended for inclusion in the plan.

17. I consider that the plan includes appropriate references to the importance of the education sector and that the role of this sector extends to a number of educational establishments outwith the city centre. Consequently I do not recommend any change in this respect.

Site Specific

18. I consider the focus on Strategic Development Areas correctly reflects the spatial strategy of SESplan which remains current and sets the context for this local development plan. However this has not ruled out consideration of sites in other areas. The inclusion of sites outwith these areas is assessed under the relevant Issues. The sites referenced at Liberton are assessed through Issue 14 which is referenced by the council under the heading of Suggested Sites: Suggested Housing Sites Outwith the Urban Area. In any event Issue 14 sets out other planning reasons why these sites were not included as suitable for inclusion. For Swanston Farm I note proposals for an outdoor adventure centre. However, drawing on our conclusions through Issue 4, I do not consider this site warrants specific reference through Figure 1. There is scope for

proposals of this nature to come forward and be assessed against the relevant policies in the plan. The second proposed plan includes a number of sites outwith the Strategic Development Areas. These sites should enable housing in a range and choice of locations. However for sites such as Ratho East, which are assessed through Issue 16 other factors such as landscape impact and accessibility are also important considerations. As explained through that issue these issues rather than whether or not the location should be within an SDA weigh against inclusion of these sites.

19. Specific matters relating to the housing land supply are addressed through Issue 5. My recommendations through this issue support the inclusion of a number of other sites in the proposed plan through Issue 14 as well as some redefinition of the green belt in south-east Edinburgh. In the interests of clarity and consistency, I recommend below that the council should amend Figures 1 and 14 to take account of these changes and show the full extent of sites included within these areas.

Other

20. Through the examination some matters were identified in the submitted representation that were not summarised in the council's schedule 4's. These have general been picked up in the relevant issue. In the context of considering the representations on this issue I noted some references were made to requested changes to mapping and/or references within the plan. These include questions as to whether the tram route follows the same line as the bus route on pages 53 and 55. In this context I note the diagram on page 55 is recommended for deletion. In paragraph 106 page 40 it is stated that the reference should be to Figure 11 not 12. On page 57 it is stated that Edinburgh Park should be annotated. Given that these would be points of clarification or factual correction I am content that these can be left to the discretion of the council in finalising the plan for adoption.

Reporter's recommendations:

Modify the proposed plan as follows:

1. Change all references to National Planning Framework 2 (paragraphs 48, 58 and the glossary) to read National Planning Framework 3. In paragraph 58 third sentence amend to read:

Strategic enhancement of Edinburgh Airport has the status of a national development along with associated provision for business space/mixed use and a new National Showground Facility. In this context the plan identifies land for the expansion of Edinburgh Airport, proposals for business and mixed use at the International Business Gateway and a safeguarded site to the south of the A8 for a new National Showground Facility.

2. Amend the glossary definition of sustainable development to read:

Sustainable Development: Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

3. Amend the map Figures 1 and 14 to include revision to the areas shown in South East Edinburgh in accordance with the recommendations in Issue 14.

Issue 2	**Green Belt and Special Landscape Areas**	
Development plan reference:	**Part 1 Section 2 pages 9 – 17** **Proposals Map**	**Reporter:** Allison Coard

Body or person(s) submitting a representation raising the issue (including reference number):

0083 Martin White
0224 Beechmount Limited
0244 Tony Gray
0321 Ratho & District Community Council
0624 South West (Edinburgh) Communities Forum
0641 Cammo Residents Association
0698 David Wilson Homes and J & J Muir
0755 BDW Trading Ltd
0799 NHS Lothian Public Health & Health Policy
0836 Heriot-Watt University
1124 Liberton Association
1149 Castle Craig Investments Ltd.
1154 CALA Management Ltd
1155 Trustees of the Foxhall Trust
1170 A J C Clark
1202 Land Options East
1463 Boland Scottish Properties Ltd
2085 A&D Brewster
2086 Persimmon Homes (East Scotland)
2088 Scottish Government
2119 Colinton Country Cattery
2126 Cockburn Association
2131 Lafarge Tarmac
2189 Currie Community Council
2201 Peter Hawkins
2222 Christopher Judson
2244 Blackford Hill Limited
2250 Mr & Mrs Love
2265 Springfield Properties Plc
2275 Murray Estates
2276 Gladman Developments Ltd
2279 Hallam Land Management Ltd
2280 Mr and Mrs Philip and Barratt David Wilson Homes
2317 Edinburgh Napier University
2408 HolderPlanning
2421 SEEDco
2476 Mr R Purves
2559 Norton Farm Consortium
2563 Royal Zoological Society of Scotland
2572 Royal Bank of Scotland
2595 Grant Wilson
2596 Christine Wilson
2693 Spire Healthcare Ltd
2703 Ogilvie Homes
2706 Juniper Green Community Council

Provision of the development plan to which the issue relates:	This issue covers green belt and Special Landscape Area matters including their designations on the Proposals Map.

Planning authority's summary of the representation(s):

CONTEXT

The Main Issues Report recognised the role of the green belt and did not propose to make significant changes to the types of development which the policy would allow. Non-statutory guidance on how proposals can meet the requirements of green belt policy has been prepared in the form of Development in the Green Belt and Countryside Guideline.

The Main Issues Report proposed to take land out of the green belt to identify land for housing and to accord with national policy. The amount and location of this is dealt with under other Issues. It also sought comments on various locations with existing non-

conforming uses (see Main Issues Report Question 15 and related text and figures).

In response to national policy and Main Issues Report representations, the LDP has taken land, including settlements, major education/research uses, major business/industrial operations and Ministry of Defence establishments, out of the green belt where appropriate and where suitable new green belt boundaries can be established.

GREEN BELT

General

- Request that the green belt boundaries are reviewed in order to meet with the requirements of Scottish Planning Policy. Paragraph 51 of Scottish Planning Policy states 'establishing clearly identifiable visual boundary markers based on landscape features such as rivers, tree belts, railways or main roads. Hedges and field enclosures will rarely provide a sufficiently robust boundary'. As it currently stands, a large swathe of green belt between the south of Edinburgh and the bypass is not protected by a decent boundary, as per Scottish Planning Policy. **(2086 Persimmon Homes (East Scotland))**
- Paragraphs 34 and 35 of the Plan identify the rationale of Edinburgh's green belt and set out reasons why some land is proposed to be removed from the green belt. To fully support the Council's proposed release of green belt land for residential development it is recommended that paragraph 35 should be modified to include reference to Policy 7 within the SDP. This policy allows the release of greenfield sites for housing development in order to maintain a five years' effective housing land supply, subject to compliance with three environmental and sustainability related criteria. **(2279 Hallam Land Management Ltd)**
- Concerned that there is no mention of the Edinburgh Green Belt Study 2008. Suggests adding in a new paragraph on page 12 stating 'The LDP recognises that pressure on the green belt from development is likely to continue. As the green belt also makes a significant contribution to the proposed National Development of Green Networks (NPF 3), it is important to provide stronger safeguards for the most valued areas of the green belt. The selection of areas is based on the Edinburgh Green Belt Review of 2008 and is set out in policy Env 10'. **(2126 Cockburn Association)**
- Objects to the reference in paragraph 35 which states that 'The boundaries of the green belt shown on the Proposals Map are largely unchanged from previous local plans.' Considers that in order to give meaning to robust boundaries a period of protection is required in which no further reductions in green belt will be permitted following establishment of new boundary. **(1124 Liberton Association)**

Brownfield before greenfield

- Requests that the existing green belt boundaries are retained intact. Objects to green belt release on the grounds that it is serving an important function, and brownfield land should be developed first. Some make specific reference to the Plan's proposed green belt releases for housing developments in Currie, Balerno, Ratho, and Juniper Green. **(0321 Ratho & District Community Council; 0624 South West (Edinburgh) Communities Forum; 1170 A J C Clark; 0799 NHS Lothian Public Health & Health Policy; 2201 Peter Hawkins; 2222 Christopher Judson; 2595 Grant Wilson; 2596 Christine Wilson; 2706 Juniper Green Community Council; 2189 Currie Community Council)**

South East Edinburgh (see also Issue 14)

- Amend the green belt boundary to exclude land at Edmonstone and allocate for housing development (up to 400 units). Considers the removal of this site as not undermining green belt objectives. The existing landscape resource could be enhanced via structural landscaping across the area, reinforcing green belt boundaries in the process and, in turn, the landscape character of the locality. States that the quality and importance of Edmonstone is of much less quality than the other proposed Special Landscape Areas. **(2408 HolderPlanning)**
- Amend the green belt boundary south of Frogston Road East to incorporate strategic housing and business requirements. States that scope exists for a contained settlement extension to provide expansion for the allocated Broomhills site to the east with new structural planting north-east of the pylon line forming a new defensible boundary. **(0755 BDW Trading Ltd)**
- Amend the green belt boundary at the Wisp (North) to accommodate a new housing proposal. It is stated that the removal of this site will not undermine green belt objectives as identified in Policy 12 of SESplan. Given its existing use, the site currently makes no contribution to the aspiration of providing access to open space and the countryside. It is stated that its development for housing would have the effect of reinforcing green belt boundaries at this location and in turn, the landscape character of the locality. **(2265 Springfield Properties plc)**

South West Edinburgh (see also Issue 16)

- Amend green belt boundary to exclude land at Ravelston Quarry from the green belt. The site is considered to be brownfield land within the green belt. Development of this site can be achieved without compromising green belt objectives. **(1463 Boland Scottish Properties Ltd)**
- Considered that the additional greenfield release will be required to augment the five year effective housing land supply. Amend the green belt boundary south of Balerno to realign it along the tree belt south of two fields on Cockburn Crescent. A specialist landscape study supported the exclusion of the two fields at Cockburn Crescent from the greenbelt based on lack of impact upon the city's landscape setting, creating a stronger urban boundary definition and facilitating greater countryside access. **(2280 Mr and Mrs Philip and Barratt David Wilson Homes)**
- Amend the green belt boundary to exclude land to the west of Ravelrig Road. The site is described as being effective in the short term and causes no harm to green belt objectives or wider landscape impact. **(2276 Gladman Developments Ltd)**
- Amend green belt boundary to exclude land at East Ratho from the green belt and allocate it for housing. **(0698 David Wilson Homes and J & J Muir)**
- Amend green belt boundary to exclude land to the south of Harvest Road, Ratho Station from the Countryside and include it in the urban area of Ratho Station. Considers that it would form a logical minor extension to the settlement of Ratho Station and would not detract from either the landscape quality or rural character of the area. **(2131 Lafarge Tarmac)**

Other locations in the green belt for housing (see also Issue 17)

- Amend green belt boundary to exclude land at Craigcrook Road from the green belt. Considers that removal of the site would maintain a long-term defensible green belt boundary. **(1154 CALA Management Ltd)**

- Supports the green belt designation at Craigcrook Road. Castle Craig Investments plan to restore Craigcrook Castle to a residential property. **(1149 Castle Craig Investments Ltd)**
- Amend green belt boundary to exclude land at Factory Field, Kirkliston from the green belt. Considers that removal of the site would not affect the quality, character and landscape setting of the city and neighbouring towns. **(1155 Trustees of the Foxhall Trust)**
- Amend green belt boundary to exclude land at Midmar from the Green Belt and allocate it for housing development (8-10 dwellings). States that the site would comply with SDP Policy 7 and would not undermine the green belt objectives. All infrastructure would be funded by the developer. The site is not identified as Grade 1 agricultural land, is considered to be effective and deliverable and will meet the shortfall in the housing land supply. **(2244 Blackford Hill Limited)**
- Amend the green belt boundary to exclude two sites at Duddingston Golf Course and allocate for housing development. **(2703 Ogilvie Homes)**

<u>Non-conforming uses in the green belt</u>

- Amend green belt boundary to exclude land at 469 Lanark Road West. Considers that green belt release would be consistent with Policy Env 10 and SDP policies 11, 12 and 13. **(0083 Martin White)**
- Request that the green belt boundary in the vicinity of the Johns Burn be reviewed and the extent of the urban area amended to include Johnsburn House. This will allow the development of a dwelling. It is not considered that the amendment of the green belt boundary in this location would compromise the strategy advocated in the SDP, nor the integrity of the wider landscape designations. **(2250 Mr & Mrs Love)**
- Amend the green belt boundary to exclude Todhills building group from the green belt and identify it as a settlement in the LDP. Todhills building group is an already developed site and therefore, does not meet green belt criteria as set out in Scottish Planning Policy. It is appropriate for inclusion in the urban area because of its character and location next to Shawfair Business Park. **(2421 SEEDco)**
- Amend the green belt boundary to exclude Beechmount House, and grounds at 102 Corstorphine Road. Consider that Beechmount House and grounds do not fulfil green belt objectives as set out in Scottish Planning Policy and the SDP. States that the more logical planning boundary for the green belt would be the western and northern boundaries of the property. **(0224 Beechmount Limited)**
- Amend the green belt boundary to remove Murrayfield Hospital. The approach taken at Corstorphine Hospital and Edinburgh Royal Infirmary set precedent and Murrayfield should be considered equally. **(2693 Spire Healthcare Ltd)**
- Amend the green belt boundary to exclude an area comprising derelict farm buildings in Hermiston. States that the buildings are immediately adjacent to and accessible from the main street of Hermiston. **(2275 Murray Estates)**
- Amend the green belt boundary to exclude the land between that which has recently been granted planning permission for a major equestrian development at 154 Woodhall Road and the properties at 164 Woodhall Road along Woodcote Cottage. It is considered that the scale of a business operation provided by the newly approved Equestrian Centre removes the notion that the green belt is protected in this location. **(2119 Colinton Country Cattery)**
- Remove the buildings to the south of Liberton Drive from the green belt and Special Landscape Area and include within the urban area. Considers that these

buildings are urban in appearance and make little contribution to the objectives of the green belt designation detracting from both it and the designated Special Landscape Area. **(1202 Land Options East)**

- Requests that the brownfield site at Craigpark Quarry is removed from the Countryside Policy Area and allocated for Country and Adventure Park (see Issue 4). State that the site boundaries shown on the LDP do not reflect those of the Rural West Edinburgh Local Plan or subsequent approved plans**.** Craigpark Quarry was originally zoned for development in the Rural West Edinburgh Local Plan. It is considered that the Craigpark Country and Adventure Park proposals will not undermine the purpose of green belt designations as set out in Scottish Planning Policy. **(2085 A&D Brewster)**
- Requests that the residential area of West Mill Road is removed from the green belt. The area would still be the subject to other relevant policies including conservation area and local nature conservation site. SPP states that green belts should be designated around settlements. Considers that the Water of Leith and its immediate surroundings can be protected by the other relevant policies. **(2476 Mr R Purves)**

Gogarburn

- Amend the green belt boundary to exclude the RBS Headquarters at Gogarburn (Policy Emp 7). Object to the inclusion on the basis that it does not accord with SPP as the scale of existing and consented development make it clear that the site is a major business use. Consider that the character and location make it appropriate to remove from the green belt. **(2572 Royal Bank of Scotland)**
- Science and Advice for Scottish Agriculture, a division of the Scottish Government, support the retention of the land, adjacent to the experimental farm and laboratory facilities at Gogarbank Farm, within the green belt. This includes land to the east of Milburn Tower. See Issue 14. **(2088 Scottish Government)**

Other request to add to urban area

- Amend the green belt boundary to exclude the site at Norton Farm designated as 'Safeguard for Potential Relocation of Royal Highland Centre'. It is considered that the inclusion of this site within the green belt is inconsistent with the co-ordinated approach to development required by National Planning Framework 3. It is stated in the LDP Environmental Report that development of the site would not affect the wider landscape setting of the city. Removal of the site from the green belt would also remove the inconsistency between the terms of Scottish Planning Policy and the LDP in respect of uses permitted within the green belt. **(2559 Norton Farm Consortium)**

Existing housing site

- Amend the green belt boundary to exclude housing allocation HSG 7. States that this allocation does not meet any green belt objectives. Recognises the importance of creating high quality development in a mature landscape setting and looks to achieve this by designation as an Special Landscape Area. **(2563 Royal Zoological Society of Scotland)**

Cammo

- Objects to HSG 20 as it represents an unjustified and unwarranted incursion into the green belt and does not comply with Policy Env 10. Requests that the Plan includes Cammo within the provisions of Policy Env 10. This should also include;
  - Retention of the existing green belt boundary at Cammo in respect of proposal HSG 20 in order to preclude proposed housing development
  - Amendment to re-instate the green belt at Cammo and preclude further urban expansion, coalescence and sprawl in this location
  - Maintain the green belt at Cammo in order to protect the landscape character and setting of the City;
  - Amendment to the Plan to reinstate green belt at Cammo. **(0641 Cammo Residents Association)**

SPECIAL LANDSCAPE AREAS

- Requests that Special Landscape Area 21 'Braids, Liberton and Mortonhall' should be extended eastwards from Morton Mains as far as Broomhills Road. The proposed Special Landscape Area should be extended for the following reasons:

  - There are outstanding views from Broomhills Road, and Frogston Road East, looking south west to the Pentland Hills and south to the open countryside
  - The land in question is as scenic as the adjacent Special Landscape Area
  - The land in question reflects the city-wide scale of landscape, as does the adjacent Special Landscape Area
  - The land in question is part of the same landscape as the adjacent Special Landscape Area
  - The land in question shares the same topographical features as the adjacent Special Landscape Area
  - The land in question gives continuity to the adjacent Special Landscape Area for recreational walking and riding
  - The case for inclusion of the area in question is strengthened further if the site at HSG21 is developed. The brief for HSG21 requires the eastern edge of Broomhills Road to be given a 50 m tree belt to strengthen the green belt boundary
  - Giving the area in question Special Landscape Area status will help prevent the gradual urbanisation of green belt land. **(0244 Tony Gray)**

- Concerned that the nature and quality of Special Landscape Areas can be altered by means other than development. For example, a row of trees planted along the southern boundary of the field bounded by Alnwickhill Road and Liberton Drive is beginning to obscure the view of the Pentland Hills. Requests to have some control over alterations to the area, such as the planting or removal of trees which could damage or detract from the overall character and appearance of the Special Landscape Area. **(1124 Liberton Association)**
- Suggests that the allocation of housing at Craigcrook Road would ensure the character and appearance of the area was not adversely effected by the new development with the key landscape features being fully respected. **(1154 CALA Management)**
- Considers that Dreghorn Polo Fields (Colinton) on the Proposals Map is now incorrect. The current development by Miller Homes on the Dreghorn Polofields in

Colinton, despite this area being an area of high landscape quality (Edinburgh Green Belt Review), a Special Landscape Area, a Local Nature Conservation Site and an area much valued by the local community for recreation. All these important assets for the community are being destroyed, so it is understandable that there is a degree of scepticism about how robustly the natural heritage will be protected in the face of development pressure. As it stands, the second sentence of paragraph 39 is misleading, implying that the benefits to landscape of development are benign, whereas this is not the general experience of communities. **(2126 Cockburn Association)**

- The proposed Special Landscape Area 09 (Pentlands) should be amended to exclude the two fields between Cockburn Crescent and the established tree boundary to the south. Suggests the Statement of Importance for Special Landscape Area 09 does not provide sufficient justification to include these fields. Suggests the proposed woodland along the south boundary would mitigate against potential visual intrusion as well as creating a long-lasting screen to Balerno's urban fringe. Claims the completed development would enhance views from the Pentlands. **(2280 Mr and Mrs Philip and Barratt David Wilson Homes)**
- Object to extension of the proposed Special Landscape Area Craiglockhart to cover entire extent of the University's ownership at Craiglockhart. Object to extension of Special Landscape Area at Craiglockhart on the grounds that it is not justified and sufficient protection is provided by assessing impact of development on setting of a listed building. **(2317 Edinburgh Napier University)**
- Object to the Special Landscape Area designated for the northern part of the Drum Estate as it is not considered to be an area of genuinely special quality in terms of landscape.

States that the scoring criteria used as the basis for the designations do not conform to best practice guidance recommended by Scottish Natural Heritage. Weight is placed on association with adjoining landscape character areas, thereby including land which is not 'special'. Certain criteria have been double-weighted, which is without sufficient justification. The threshold for identifying Special Landscape Areas has been arbitrarily established. The threshold is lower than it should be and includes sites of moderate quality, which dilute the 'special' status of truly special landscapes. The land around the periphery of the Drum Estate makes little contribution to the estate landscape. The Designed Landscape designation in the Inventory is largely due to its cultural significance rather than its landscape quality, which is considered to be of moderate quality. The measurement of the quality of a Designed Landscape depends mostly on factors other than landscape, and that designation should not lead automatically towards Special Landscape Area designation. An additional landscape designation is not considered appropriate.

Even if the Special Landscape Area is retained as a designation in the LDP, it does not, in our view, raise any additional issues which have not been taken into account by the Simpson & Brown Conservation Plan. **(2421 SEEDco)**

- Considers that the boundary of the proposed Special Landscape Area on Corstorphine Hill be re-assessed and altered to omit the land around Murrayfield Hospital. Object to inclusion on basis that the character varies from the wider Special Landscape Area and it would be more appropriate to consider it in the context of built environment around Corstorphine Hill. The woodland edge around the north, east and west perimeter of the Murrayfield Hospital site provides a strong woodland buffer between the site and surrounding hillside landscape.

Following this boundary would provide an appropriate amendment to the Special Landscape Area which would create a defensible perimeter which is more justifiable in landscape terms. **(2693 Spire Healthcare Ltd)**

Modifications sought by those submitting representations:

GREEN BELT

General

- Request that the green belt boundaries are reviewed in order to meet with the requirements of Scottish Planning Policy. **(2086 Persimmon Homes (East Scotland))**
- Amend paragraph 35 in the Plan to include reference to SDP Policy 7. **(2279 Hallam Land Management Ltd)**
- Add in a new paragraph on page 12 stating 'The LDP recognises that pressure on the green belt from development is likely to continue. As the green belt also makes a significant contribution to the proposed National Development of Green Networks (NPF 3), it is important to provide stronger safeguards for the most valued areas of the green belt. The selection of areas is based on the Edinburgh Green Belt Review of 2008 and is set out in policy Env 10'. **(2126 Cockburn Association)**
- Requests that the Council includes a period of protection during which no further reductions in green belt will be permitted following establishment of new boundary. **(1124 Liberton Association)**

Brownfield before green belt

- Requests that the existing green belt boundaries are retained intact. Objects to green belt release on the grounds that it is serving an important function, and brownfield land should be developed first. **(0321 Ratho & District Community Council; 0624 South West (Edinburgh) Communities Forum; 1170 A J C Clark; 0799 NHS Lothian Public Health & Health Policy; 2201 Peter Hawkins; 2595 Grant Wilson; 2596 Christine Wilson; 2706 Juniper Green Community Council; 2189 Currie Community Council)**

South East Edinburgh (see also Issue 14)

- Amend the green belt boundary to exclude land at Edmonstone and allocate for housing development (up to 400 units). **(2408 HolderPlanning)**
- Amend the green belt boundary south of Frogston Road East to incorporate strategic housing and business requirements. **(0755 BDW Trading Ltd)**
- Amend the green belt boundary at the Wisp (North) to accommodate a new housing proposal. **(2265 Springfield Properties plc)**

South West Edinburgh (see also Issue 16)

- Amend green belt boundary to exclude land at Ravelston Quarry from the green belt. **(1463 Boland Scottish Properties Ltd)**
- Amend the green belt boundary south of Balerno to realign it along the tree belt south of two fields on Cockburn Crescent. **(2280 Mr and Mrs Philip and Barratt David Wilson Homes)**

- Amend the green belt boundary to exclude land to the west of Ravelrig Road. **(2276 Gladman Developments Ltd)**
- Amend green belt boundary to exclude land at East Ratho from the green belt and allocate it for housing. **(0698 David Wilson Homes and J & J Muir)**
- Amend green belt boundary to exclude land to the south of Harvest Road, Ratho Station from the countryside and include it in the urban area of Ratho Station. **(2131 Lafarge Tarmac)**

Other locations in the green belt for housing (see also Issue 17)

- Amend green belt boundary to exclude land at Craigcrook Road from the green belt. **(1154 CALA Management Ltd)**
- Amend green belt boundary to exclude land at Factory Field, Kirkliston from the green belt. **(1155 Trustees of the Foxhall Trust)**
- Amend green belt boundary to exclude land at Midmar from the green belt and allocate it for housing development. **(2244 Blackford Hill Limited)**
- Amend the green belt boundary to exclude two sites at Duddingston Golf Course and allocate for housing development. **(2703 Ogilvie Homes)**

Non-conforming uses in the green belt

- Amend green belt boundary to exclude land at 469 Lanark Road West. Considers that green belt release would be consistent with Policy Env 10 and SDP policies 11, 12 and 13. **(0083 Martin White)**
- Request that the Balerno green belt boundary in the vicinity of the Johns Burn be reviewed and the extent of the urban area amended to include Johnsburn House. This will allow the development of a dwelling. **(2250 Mr & Mrs Love)**
- Amend the green belt boundary to exclude Todhills building group from the green belt and identify it as a settlement in the LDP. **(2421 SEEDco)**
- Amend the green belt boundary to exclude Beechmont House, and grounds at 102 Corstorphine Road. Consider that Beechmount House and grounds do not fulfil green belt objectives as set out in Scottish Planning Policy and the SDP. States that the more logical planning boundary for the green belt would be the western and northern boundaries of the property. **(0224 Beechmount Limited)**
- Amend the green belt boundary to remove Murrayfield Hospital. **(2693 Spire Healthcare Ltd)**
- Amend the green belt boundary to exclude an area comprising derelict farm buildings in Hermiston. **(2275 Murray Estates)**
- Amend the green belt boundary to exclude the land between that which has recently been granted planning permission for a major equestrian development at 154 Woodhall Road and the properties at 164 Woodhall Road along Woodcote Cottage. **(2119 Colinton Country Cattery)**
- Remove the buildings to the south of Liberton Drive from the Green Belt and Special Landscape Area and include within the urban area. **(1202 Land Options East)**
- Requests that the brownfield site at Craigpark Quarry is removed from the Countryside Policy Area and allocated for Country and Adventure Park (see Issue 4). **(2085 A&D Brewster)**
- Requests that the residential area of West Mill Road is removed from the green belt on the grounds that it is a residential street. **(2476 Mr R Purves)**

Gogarburn

- Amend the green belt boundary to exclude the RBS Headquarters at Gogarburn (Policy Emp 7). **(2572 Royal Bank of Scotland)**

Other request to add to urban area

- Amend the green belt boundary to exclude the site at Norton Farm designated as 'Safeguard for Potential Relocation of Royal Highland Centre'. **(2559 Norton Farm Consortium)**

Existing housing site

- Amend the Green Belt boundary to exclude housing allocation HSG 7. **(2563 Royal Zoological Society of Scotland)**

Cammo

- Requests that the Plan includes Cammo within the policy provisions of Policy Env 10. This should also include;
  - Retention of the existing green belt boundary at Cammo in respect of HSG 20 in order to preclude proposed housing development
  - Amendment to re-instate the green belt at Cammo and preclude further urban expansion, coalescence and sprawl in this location
  - Maintain the green belt at Cammo in order to protect the landscape character and setting of the City;
  - Amendment to the Plan to reinstate the Green Belt at Cammo. **(0641 Cammo Residents Association)**

SPECIAL LANDSCAPE AREAS

- Requests that Special Landscape Area 21 'Braids, Liberton and Mortonhall' should be extended eastwards from Morton Mains as far as Broomhills Road. **(0244 Tony Gray)**
- Requests to have some control over alterations to the area, such as the planting or removal of trees which could damage or detract from the overall character and appearance of the Special Landscape Area. **(1124 Liberton Association)**
- Remove land at Craigcrook Road from the protection of Policy Env 11. **(1154 CALA Management Ltd)**
- On page 13 paragraph 39 Line 3 after 'development' insert 'in certain areas...' Delete Special Landscape Area and Local Nature Conservation Site designations at Dreghorn Polo Fields and insert Housing Proposal. **(2126 Cockburn Association)**
- Special Landscape Area 09 – Pentlands should be amended to exclude the two fields between Cockburn Crescent and the established tree boundary to the south. Suggests the Statement of Importance for Special Landscape Area 09 does not provide sufficient justification to include these fields. Suggests the proposed woodland along the south boundary would mitigate against potential visual intrusion as well as creating a long-lasting screen to Balerno's urban fringe. Claims the completed development would enhance views from the Pentlands. **(2280 Mr and Mrs Philip and Barratt David Wilson Homes)**
- Object to extension of the Special Landscape Area Craiglockhart to cover entire

extent of the University's ownership at Craiglockhart. Object to extension of Special Landscape Area at Craiglockhart on the grounds that it is not justified and sufficient protection is provided by assessing impact of development on the setting of a listed building. **(2317 Edinburgh Napier University)**

- Object to the Special Landscape Area designated for the northern part of the Drum Estate as it is not considered to be an area of genuinely special quality in terms of landscape. **(2421 SEEDco)**
- Remove land at Murrayfield Hospital from Special Landscape Area. Object to inclusion on basis that the character varies from the wider Special Landscape Area and it would be more appropriate to consider it in the context of built environment around Corstorphine Hill. **(2693 Spire Healthcare Ltd)**

Summary of responses (including reasons) by planning authority:

GREEN BELT

General

- All land within Strategic Development Areas has been assessed as part of the Council's housing site assessment, using criteria relating to the function of the green belt. As stated in paragraph 34 of the LDP and supported by SDP Policy 12, the purpose of the green belt is to;
  - direct planned growth to the most appropriate locations and support regeneration;
  - protect and enhance the quality, character, landscape setting and identity of the city and neighbouring towns;
  - protect and give access to open space within and around the city and neighbouring towns.

  The site assessment is set out in the Environmental Report. It concluded that the southeast facing slopes and open ridgeline, which extends to Gilmerton and Edmonstone to the east should remain open to provide northward views to the city skyline from Lang Loan.

  In the study of the Edinburgh Green Belt boundaries undertaken in 1999, the purposes of the green belt were stated to be in accordance with government guidance (Scottish Office Circular 24/1985). No modification proposed. **(2086 Persimmon Homes (East Scotland))**
- SDP Policy 7 (Maintaining a Five Year Housing Land Supply) provides a mechanism to ensure that a five years effective land supply is maintained at all times. The Council does not consider it necessary to modify paragraph 35 to include reference to SDP Policy 7. Paragraph 64 of the LDP states that 'The Council must maintain a five year's effective housing land supply at all times'. It also states that 'Edinburgh's supply of housing will be monitored through the annual housing audit.' Paragraph 65 states that 'if annual monitoring shows a five year's effective supply is not being maintained, SDP Policy 7 sets out criteria to bring forward additional Greenfield housing sites'. See also Issue 5. No modification proposed. **(2279 Hallam Land Management Ltd)**
- There is no need to add in a new paragraph on page 12, which refers to the green belt's contribution to the Central Scotland Green Network. In accordance with SDP Policy 12, paragraph 49 of the LDP states that 'some parts of the green belt

contribute to Edinburgh's green network. Key elements include the Pentlands Hill Regional Park, Bonaly Country Park, Cammo Estate, the Water of Leith, the Union Canal, Waterfront Promenade and the proposed South East Wedge Parkland'. These are identified in Figure 5 Green Network map. Development in the green belt and countryside is assessed against Policy Env 10 in Part 2 Section 3 of the Plan. No modification proposed. **(2126 Cockburn Association)**

- The description of land as green belt establishes a presumption against most types of development for the Plan period. As outlined by paragraph 50 of Scottish Planning Policy, in developing the spatial strategy, planning authorities should identify the most sustainable locations for longer term development and where necessary review the boundaries of any green belt. However, LDPs must be reviewed every five years, and a LDP cannot prescribe the content of its successor. No modification proposed. **(1124 Liberton Association)**

Brownfield before green belt

- A number of representations object to the Plan because it proposes development on land currently in the green belt. The LDP provides a green belt around Edinburgh as required by the SDP. However, it must also ensure that the strategic growth requirements of the SDP can be accommodated. One of the purposes of a green belt is to direct planned growth to the most appropriate locations, as set out in SDP Policy 12b). Sites in the green belt have been identified to help meet strategic housing requirements. More detailed information on why the housing sites have been identified is set out in Volume 2 of the Environmental Report Second Revision. No modification proposed. **(0321 Ratho & District Community Council; 0624 South West (Edinburgh) Communities Forum; 1170 A J C Clark; 0799 NHS Lothian Public Health & Health Policy; 2201 Peter Hawkins)**

South East Edinburgh (see also Issue 14)

- The suggested change to the green belt land at Edmonstone and suggested housing allocation of up to 400 units has been assessed. The assessment criteria are explained in the LDP Environmental Report. These changes are not supported for the reasons explained in Issue 14. No modification proposed. **(2408 HolderPlanning)**
- The suggested change to the green belt land south of Frogston Road East has been assessed. The assessment criteria are explained in the LDP Environmental Report. These changes are not supported for the reasons explained in issue 14. No modification proposed. **(0755 BDW Trading Ltd)**
- The suggested change to the green belt land at the Wisp (North) has been assessed. The assessment criteria are explained in the LDP Environmental Report. These changes are not supported for the reasons explained in issue 14. No modification proposed. **(2265 Springfield Properties plc)**

South West Edinburgh (see also Issue 16)

- The suggested green belt change at Ravelston Quarry and proposed housing site has been assessed. The assessment criteria are explained in the LDP Environmental Report. These changes are not supported for the reasons explained in Issue 16. No modification proposed. **(1463 Boland Scottish Properties Ltd)**
- The suggested green belt change south of Balerno at Cockburn Crescent and

suggested housing allocation has been assessed. The assessment criteria are explained in the LDP Environmental Report. These changes are not supported for the reasons explained in Issue 16. No modification proposed. **(2280 Mr and Mrs Philip and Barratt David Wilson Homes)**

- The suggested green belt change to the west of Ravelrig Road and suggested housing allocation has been assessed. The assessment criteria are explained in the LDP Environmental Report. These changes are not supported for the reasons explained in Issue 16. No modification proposed. **(2276 Gladman Developments Ltd)**
- The suggested green belt change to land at East Ratho and suggested housing allocation has been assessed. The assessment criteria are explained in the LDP Environmental Report. These changes are not supported for the reasons explained in Issue 16. No modification proposed. **(0698 David Wilson Homes and J & J Muir)**
- The suggested Countryside Policy Area change to land south of Harvest Road, Ratho Station and suggested housing allocation has been assessed. The assessment criteria are explained in the LDP Environmental Report. These changes are not supported for the reasons explained in Issue 16. No modification proposed. **(2131 Lafarge Tarmac)**

Other locations in the green belt for housing (see also Issue 17)

- The suggested green belt change to land at Craigcrook and suggested housing allocation has been assessed. The assessment criteria are explained in the LDP Environmental Report. These changes are not supported for the reasons explained in Issue 17. No modification proposed. **(1154 CALA Management Ltd)**
- The suggested green belt change to land at Factory Field, Kirkliston and suggested housing allocation has been assessed. The assessment criteria are explained in the LDP Environmental Report. These changes are not supported for the reasons explained in Issue 17. No modification proposed. **(1155 Trustees of the Foxhall Trust)**
- The suggested green belt change to land at Midmar and suggested housing allocation has been assessed. The assessment criteria are explained in the LDP Environmental Report. These changes are not supported for the reasons explained in Issue 17. No modification proposed. **(2244 Blackford Hill Limited)**
- The suggested green belt change to land at Duddingston Golf Course and suggested housing allocations have been assessed. The assessment criteria are explained in the LDP Environmental Report. These changes are not supported for the reasons explained in Issue 17. No modification proposed. **(2703 Ogilvie Homes)**

Non-conforming uses in the green belt

- Lanark Road West already forms a strong, clearly identifiable green belt boundary at this location. There is no justification to amend the boundary to remove this individual property. It would result in a weak boundary contrary to Strategic Planning Policy and SDP paragraph 130. No modification proposed. **(0083 Martin White)**
- The existing green belt boundary in the vicinity of Johns Burn is strong and clearly identifiable. It is not appropriate to amend this to create a weaker boundary in order to support the development of a house. No modification proposed. **(2250 Mr**

& Mrs Love)

- The site of Todhills Building Group does not in itself meet green belt objectives. However, it is part of a wider area that does, with the A7, provide a strong clearly identifiable boundary. Removing the site from the green belt would create a weaker boundary. No modification proposed. **(2421 SEEDco)**
- Beechmount House is part of the green belt at Corstorphine Hill and contributes to the landscape setting of the city. Its removal from the green belt would undermine green belt objectives in this location. No modification proposed. **(0224 Beechmount Limited)**
- The site of Murrayfield Hospital is part of the green belt at Corstorphine Hill and contributes to the landscape setting of the city. Its removal from the green belt would undermine green belt objectives in this location. No modification proposed. **(2693 Spire Healthcare Ltd)**
- In accordance with national policy and SDP paragraph 131, the Plan has excluded the village of Hermiston from the green belt. However, the adjacent farm buildings are still covered by the green belt, as they are considered to be rural in character and include temporary structures. Their removal from the green belt and inclusion in the urban area would be detrimental to the landscape setting of the city. No modification proposed. **(2275 Murray Estates)**
- The equestrian development at 154 Woodhall Road has a countryside recreation use which conforms in principle with the green belt policy. No modification proposed. **(2119 Colinton Country Cattery)**
- The buildings to the south of Liberton Drive do not in themselves meet green belt objectives. However, the site is part of a wider area that does. Removing the site from the green belt would create a weaker boundary. No modification proposed. **(1202 Land Options East)**
- The urban area boundary in this area is established by the housing consent to the east of the Quarry. No modification proposed. **(2085 A&D Brewster)**
- SPP supports green belt corridors such as the Water of Leith. The residential gardens are considered an integral part of this corridor and their removal would undermine the green belt objective relating to “protecting the quality of character, landscape setting and identity of the city”. **(2476 Mr R Purves)**

<u>Gogarburn</u>

- The principle of excluding a major business site like RBS Gogarburn from the green belt is supported by Scottish Planning Policy. However, the A8 currently provides a strong clearly identifiable green belt boundary. If this site is taken out of the green belt in isolation from other land to the south of the A8, it is not possible to create a suitable clear and defensible green belt boundary. The Plan, therefore proposes to retain RBS Gogarburn in the green belt but has applied Policy Emp 7 in recognition of its special economic importance and to avoid undue constraint on development. Issue 20 addresses related representations. No modification proposed. **(2572 Royal Bank of Scotland)**

<u>Other request to add to urban area</u>

- National Planning Framework 3 requires land at Norton Park to be safeguarded for the potential relocation of the Royal Highland Centre, if necessary to facilitate airport expansion. No modification proposed. **(2559 Norton Farm Consortium)**

Existing housing site

- The matter of removing HSG 7 from the green belt was considered through the Edinburgh City Local Plan Inquiry. Given the particular characteristics of this housing site, the Reporters recommended the site be identified as a housing proposal but retained in the green belt. There has been no change in circumstances to justify a change in approach. No modification proposed. **(2563 Royal Zoological Society of Scotland)**

Cammo

- Cammo is included in the Plan as a housing site. The assessment used to identify suitable housing sites and the outcome of the assessment for this site and others are set out in the LDP Environmental Report. The SDP requires the LDP to give priority to sites in West and South East Edinburgh before allocating greenfield sites for housing elsewhere in Edinburgh. Further information on how the LDP is meeting its housing requirement, including the contribution from brownfield sites is provided in Part 1 Section 3 of the Plan pages 20 - 21. No modification proposed. **(0641 Cammo Residents Association)**

SPECIAL LANDSCAPE AREAS

- The proposed boundary of Special Landscape Area 21 reflects a city-wide scale of landscape character assessment and evaluation carried out as part of the Review of Local Landscape Designations (2010). Whilst the boundaries of landscape character areas often reflect the transition between a series of different characteristics on the ground, it is considered that the long-standing woodland at Frogston Brae, which is associated with the designed landscape of Mortonhall, provided the clearest identifiable Special Landscape Area boundary on the ground.

As noted by the representation, the land to the east of Frogston Brae provides important views to and from the city, including an outlook to the Pentland Hills from Frogston Road East, Broomhills Road and the Mortonhall path network. Accordingly, its contribution to protecting and enhancing the character, landscape setting and identity of the city is reflected by the existing Green Belt designation. It is the role of the green belt to direct planned growth to the most appropriate locations. No modification proposed. **(0244 Tony Gray)**

- The controls over planting of trees in a landscape are outwith the planning system. Controls to protect trees are outwith the scope of this Plan. No modification proposed. **(1124 Liberton Association)**
- The site is visually prominent and its hillside terrain and parkland trees associated with the Craigcrook Castle non-Inventory designed landscape, conform to the characteristics and qualities of the proposed Corstorphine Hill Special Landscape Area. The representation has been fully considered taking account of the location, landscape quality and setting of the site in question. Its inclusion within the Special Landscape Area boundary is justified. No modification proposed. **(1154 CALA Management Ltd)**
- The policy context set out in paragraph 39 is consistent with Scottish Planning Policy and the presumption in favour of development that contributes to sustainable development. The wording of several design and environmental policies which relate to the natural heritage clearly set out that this should not be interpreted at any cost.

The Reporter's Decision ref: PPA-230-2041, Land 260 metres south of Dreghorn Loan determined the principle of development at Dreghorn Polofields in Colinton in 2011, subsequent to the Edinburgh Green Belt Study (2008).

In line with the Reporter's recommendations, the developer was required to prepare and implement a Woodland Management Scheme for Covenanters Wood as part of the S.75 which will enable greater opportunities for public access and informal recreation. As part of the subsequent application for the Approval of Matters Specified in Conditions ref: 12/03823/AMC and 13/02928/AMC, the Council secured a new linear park to the west of the site and retention of a viewpoint towards the Pentland Hills. This mitigation is in line with the Reporter's Notice of Intention. These measures were considered to suitable mitigate the impact of development upon recreation and the local landscape.

In terms of the Local Nature Conservation Site, the Reporter found that the development would not impact upon protected species and that the loss of open grassland within the site would be mitigated by the implementation of habitat improvement measures across the wider Local Nature Conservation Site through implementation of the Woodland Management Scheme at Covenanters Wood.

Whilst the proposed Special Landscape Area applies to the housing site, it also encompasses the Braid Burn valley and Covenanters Wood, which are features of the former Dreghorn Castle non-Inventory designed landscape and remain important structural components within the landscape – both within the urban area and upon the northern footslopes of the Pentland Hills.

A review of the Local Nature Conservation Site boundaries will be undertaken following completion of the development prior to preparation of the subsequent Local Development Plan.

No modification proposed. **(2126 Cockburn Association)**

- Whilst land to the south of Cockburn Crescent is in part influenced by the character of the urban edge to the north, it also conforms to the visual qualities and characteristics of the proposed Special Landscape Area i.e. the characteristic pattern of farmland and rectilinear shelterbelts on the upland fringe, associated with several non-Inventory designed landscapes to the south and west of Balerno and provides an open foreground to views to the skyline of the Pentland Hills to the south and west of Balerno and provides an open foreground to views to the skyline of the Pentland Hills to the south, which would be enclosed by the formation of dense planting to the south.

Due to the fragmented nature of the tree belt to the south of the site and open outlook to the Pentland Hills from the settlement edge to the north, Cockburn Crescent provides a clearly identifiable boundary to the proposed Special Landscape Area, from which the wider landscape can be appreciated and the site forms an important transition between the urban and rural landscape.

No modification proposed. **(2280 Mr and Mrs Philip and Barratt David Wilson Homes)**

- Special Landscape Area designations are not determined by land ownership and may include parts of the built up area. The proposed Craiglockhart Special Landscape Area reflects the full extent of the Craiglockhart Hills' landform, the

grounds of former manor houses and institutions sited on the Hills, including the former Edinburgh Hydropathic Hospital and the valley of Glenlockhart, between Easter and Wester Craiglockhart Hill. The impact of development on the setting of a Listed Building should be considered separately from its wider landscape and visual effects. No modification proposed. **(2317 Edinburgh Napier University)**

- The methodology followed by the Council's Review of Local Landscape Designations, reflects 'Guidance on Local Landscape Designations' published by Scottish Natural Heritage and Historic Scotland, whilst also responding to Edinburgh's local circumstances. Each landscape character area was evaluated against a narrative framework, which was then converted to a numerical score for ranking purposes. The evaluation criteria considered a wide range of factors which contribute to landscape character and quality, including cultural heritage, naturalness, geology, and spatial variations in quality. In addition, it was necessary to consider local circumstances, such as contribution to the World Heritage Site, protected views and the landscape setting of the City.

Across the range of criteria evaluated, weighting was applied to Scenic Quality, Distinctiveness and Enjoyment. This reflects the main purposes of a local landscape designation under paragraph 197 of Scottish Planning Policy i.e. to safeguard and enhance the character and quality of a landscape which is important; or promote understanding and awareness of the distinctive character and special qualities of local landscapes; or safeguard and promote important local settings for outdoor recreation and tourism.

Removal of the double-weighting applied to these criteria does not alter the evaluation of The Drum as a landscape character area ranked within the top-third of sites. The series of candidate Special Landscape Areas identified were then subject to consultation, providing opportunity for public comment on the relative merits of each candidate Special Landscape Area, their naming, physical extent and accompanying written descriptions.

The Inventory of Gardens and Designed Landscapes in Scotland acknowledges the setting of Drum House is enclosed by estate boundary plantings, this does not diminish the value of the wider policies and farmed estate in terms of landscape character and in announcing the presence of the historic environment. In combination with Holyrood Park, Duddingston House and Prestonfield, Craigmillar Castle, the South East Wedge Parkland and Edmonstone estate, the Drum contributes to a structural wedge of open landscape and green space to the southeast of the city. This contributes to the landscape setting of the city and retains Edinburgh's distinct identity from surrounding settlements.

The proposed boundary of the Drum candidate Special Landscape Area therefore reflects the availability of foreground views and overall composition of historic environment assets, as perceived in their landscape context of the city's southern skyline. No modification proposed. **(2421 SEEDco)**

- The site is visually prominent and its hillside terrain and landscaped grounds associated with the Beechwood House non-Inventory designed landscape, conform to the characteristics and qualities of the proposed Corstorphine Hill Special Landscape Area. The Special Landscape Area will replace the long standing Corstorphine Hill Area of Great Landscape Value with non substantive boundary changes. No modification proposed. **(2693 Spire Healthcare Ltd)**

Reporter's conclusions:

Green Belt

1. Paragraphs 34 and 35 of the plan set out the purpose of the green belt and the reasons why some of the boundaries have been amended to accommodate the strategic requirements of SESplan. I consider this provides a sufficient context for the Edinburgh Green Belt without explaining where exceptions might apply or whether further changes would be required to accommodate a 5 year housing land supply. I have addressed the application of SESplan Policy 7 through Policy Hou 1 in Issue 23. The green belt was reviewed in relation to the council's assessment of the areas set out in the various versions of the Environment Report set in the context of a strategic plan which sought to minimise green belt release. Further assessment of green belt objectives in relation to individual sites proposed for inclusion in the plan has been carried out through this examination resulting in recommendations for further green belt land to be released. I am not persuaded that an additional or further review of green belt boundaries is required at this stage.

2. I note the representation regarding the green belt to the south of Edinburgh but this does not include any details or reasoning. Our assessment of the green belt has focussed on the particular sites and areas as referenced in representations and as set out in the various area specific issues. This has resulted in some redefinition and rationalisation of the green belt in south east Edinburgh to establish a more defensible long term boundary and recognise the potential for some additional growth subject to further assessment as detailed through Issue 14.

3. I accept that the green belt makes a significant contribution to the proposed National Development of Green Networks (NPF3) and that it is important to have adequate safeguards to protect the retained green belt. I understand the Green Belt Review 2008 assessed the green belt as a whole to identify its key characteristics, strengths and weaknesses. The earlier 1999 boundary study focussed not on finding sites but on examining the defensibility of the green belt boundaries. Whilst elements of these assessments remain relevant considerations the site assessments carried out for this plan are placed in the context of the strategic development requirements of the current SESplan. Through Issue 14 I have referenced the 2008 green belt review in assessing the appropriate location of a long term green belt boundary to accommodate current and potential future growth.

4. SESplan accepts significant development in the Strategic Development Areas and in other greenfield/greenbelt locations elsewhere in the city. In this context, areas of potential for housing development were assessed against green belt objectives with a view to minimising impacts but also taking into account other planning objectives such as accessibility to public transport. Policy 12 requires local development plans to define green belt boundaries ensuring that strategic development requirements including housing land can be accommodated whilst minimising impact on green belt objectives.

5. Paragraph 50 of Scottish Planning Policy states that "In developing the spatial strategy, planning authorities should identify the most sustainable locations for longer-term development and, where necessary, review the boundaries of any green belt". I consider the council has carried out this requirement in the context of the spatial strategy established through SESplan. Given the different context within which these assessments are set, I do not consider it would be appropriate or necessary for the plan

to reference a previous green belt review.

6. Whilst the objective of retaining long term robust boundaries for the green belt applies the proposed plan is subject to replacement 5 years from adoption. It would not be possible or appropriate to place a moratorium or time limit on future review as this would prevent the due consideration of any change in local circumstances, national policy and future development requirements.

7. I do not consider that all previously identified green belt boundaries could be retained given the context set by the spatial strategy and housing targets as determined through SESplan. There is no currently established approach to enable the council to incentivise development on brownfield sites. However, I accept, through my conclusion on Issue 5, that the proposed Scottish Government Infrastructure Fund may have a role in enabling the uptake of land at the water-front. Redefinition of green belt through the local development plan should not weaken the remaining green belt. In these areas the protection of Policy Env 10 would continue to apply.

Brownfield before Green Field

8. Promoting re-use of brownfield land is an important planning objective as reflected in the National Planning Framework 3 and Scottish Planning Policy. Edinburgh has a significant resource in this respect including substantial potential for redevelopment of the water-front. The National Planning Framework recognises the waterfront as a priority for regeneration, new homes and port, energy and industrial development.

9. SESplan paragraph 33 recognises the area's potential as one of the largest regeneration projects in Europe. However, given the extent of identified need to deliver housing within the timeframe of the plan and the inherent time lags involved in delivery of significant brownfield sites (given the works and costs involved as well as issues around marketability) brownfield land alone is unlikely to enable the housing land requirement to be met. This is illustrated by the programming assumptions set out through my conclusions on Issue 5. These show a shortfall in the amount of housing to be built to 2019 and potentially beyond when compared with the targets established through SESplan.

10. In this context the principle of greenfield release in South-East Edinburgh has been promoted since the 1990's and the West Edinburgh Strategic Development Area is an internationally recognised area of economic importance (paragraphs 38 and 42 of SESplan). Further green-field releases are identified through the proposed plan elsewhere in including in Queensferry, Currie and Balerno. For these reasons, and in the context of Issue 5, I do not consider that an approach requiring brownfield land to be delivered in advance of green belt release would be realistic or consistent with the housing delivery objectives of SESplan or national planning policy.

West and South East Edinburgh

11. My assessments of additional sites proposed in the green belt including East of Millburn Tower (where I also address the concerns raised by the Scottish Government on behalf of Science and Advice for Scottish Agriculture), Edmonstone, Frogston Road East and the Wisp (north) are set out in Issue 14. This includes assessment of the contribution of these sites to green belt objectives and whether they merit inclusion as housing sites in this local development plan. A number of consequent changes to the

green belt in South-East Edinburgh are proposed to accommodate additional land release in this area including at Edmonstone and the Wisp (north). In addition there is some recommended refinement of the green in the area around Lang Loan, Lasswade Road and Gilmerton Station Road in order to rationalise the boundary in accordance with Scottish Planning Policy. This takes account of recent appeal decisions as well as some recognised potential for future growth subject to further detailed assessment. For the avoidance of doubt I have included a cross reference below to the consequent green belt changes in Issue 14.

South West Edinburgh

12. Proposed sites at Ravelston Quarry, Cockburn Crescent - Balerno, Ravelrig Road - Balerno, East of Ratho and Harvest Road - Ratho Station are assessed through Issue 16. This includes assessment of their contribution to green belt objectives or retention within the countryside and whether they merit current inclusion in this local development plan. The site at Ravelrig Road Balerno is recommended for inclusion as a housing site with consequent amendment to the green belt boundary as detailed through that issue. For consistency I have also cross referenced this below.

Other locations in the green belt for housing

13. Land at Craigcrook Road, Midmar and Duddingston Golf Course is assessed through Issue 17. This includes assessment of their contribution to green belt objectives and whether they merit current inclusion in this local development plan. Our conclusions on these sites do not support their deletion from the green belt and consequently Policy Env 10 would continue to apply. There is a consequent change to the green belt for Kirkliston which reflects the recommendation through Issue 15 to amend the green belt boundary in relation to the site referenced as Factory Field.

Non-conforming uses in the green belt

14. The submissions on 469 Lanark Road West reference compliance with Policy Des 9. However, I consider the objective of this policy is to strengthen the green belt boundary and enable a clear demarcation between town and country. In this case it is clear to me that Lanark Road West is the natural boundary of the green belt in this location. It is not unusual for individual houses and their gardens to be included in the green belt. Policy Env 10 on Development in the Green Belt and Countryside sets out the circumstances where development could be permitted. For example this could include an extension to a house or for ancillary development.

15. On my site visit I found nothing to suggest that the established green belt in this area was no longer appropriate. Development would not lead to coalescence between Currie and Balerno. However, I consider the property contributes to the wooded setting of the Water of Leith Walkway which has a clear role in protecting and enhancing the quality, character, landscape setting and identity of the urban area. In my view this site clearly forms part of the wooded embankment along the Water of Leith rather than part of the urban area to the north.

16. Paragraph 180 of the proposed plan explains that Policy Env 18 applies to all open space whether public or private. This designation does not confer any right of access and also applies to protecting areas that are an integral part of the city's landscape and townscape character. Again this does not imply a moratorium on development only that if

development were permitted it should not be detrimental to landscape and townscape character. In a similar vein Policies Env 11 on Special Landscape Areas and Env 15 on sites of local importance for nature conservation apply given the sites location as part of the Water of Leith corridor with its recognised landscape and nature conservation value. Despite being private garden ground the wooded site undoubtedly forms part of this area of value. Consequently, I consider these designations are correctly applied. For these reasons my conclusion is that no change is required to address this representation.

17. In a similar vein the representation requesting deletion of a site in the green belt, at Johnsburn Road in Balerno, proposes a small amendment to the boundary to allow for a single house. Scottish Planning Policy paragraph 51 states the importance of establishing clearly identifiable visual boundary markers based on landscape features such as rivers, tree belts, railways or main roads. In this case the established green belt boundary follows the tree belt to the north and west of the more urban form of housing at Johnsburn Haugh.

18. I appreciate the site groups with housing on Glenbrook Road and that there may be scope to absorb some development on this well screened site with limited visual impact. However, the site retains a countryside character distinct from that further to the east of the tree belt along Johnsburn Road. I do not consider that it would be appropriate to compromise the established boundary of the green belt to include this single house site. In any event, this small scale of development is more appropriately considered through the development management process. It may be appropriate for future green belt review to address small changes to boundaries and ensure a consistent approach throughout the city. I would be concerned to apply an ad hoc approach to minor adjustments, through this examination, given that these are not required to address its strategic objectives.

19. I accept the relatively close relationship between the building group at Todhills and Shawfair Business Park in Midlothian. Whilst I appreciate that the buildings themselves do not contribute to green belt objectives this would apply in a number of locations in Edinburgh where individual or groups of buildings are included in order to achieve a long term defensible boundary.

20. As stated elsewhere in this report I would be concerned to adopt a piecemeal approach to small refinements and changes to the green belt to accommodate single properties or building groups. This could lead to an incremental erosion of green belt objectives and a lack of consistency. Whilst the plan and this examination has accepted changes to the green belt elsewhere this has been to accommodate changes of a more significant and strategic scale. I do not consider that a change to the established green belt and its defined boundary along the A7 would be appropriate in this instance. Policy Env 10 sets a framework for proposals within the green belt and would not rule out appropriate conversion or redevelopment.

21. Similarly representation seeks removal of the building group to the south of Liberton Drive which is currently in use as riding stables. This is a use that is consistent with Policy Env 10. Whilst I accept the buildings themselves do not contribute to green belt objectives it is a countryside use retained within the green belt in an area where the green belt is well defined. Deletion of the building group would in my view weaken the established green belt boundary and apply an incremental incursion into a green wedge of land that continues to fulfil green-belt objectives and is important to the landscape setting of the city. Consequently I do not consider the site should be deleted from the

green belt or the Special Landscape Area.

22. Beechmount House and its grounds form part of the established green belt at Corstorphine Hill. The submissions refer to the planning history of Beechmount House and the fact that there has been change of use to a hotel and conversion of the coach house. I appreciate there is low density housing in a landscape setting on the sloping land to the east. However, I consider the house and its wooded grounds mark a clear distinction between this urban edge and the more prominent slopes of Corstorphine Hill. As part of a hill, which is a significant landscape feature in an Edinburgh context, it has a recognised landscape quality which contributes to the setting of the city. I consider the site continues to make an important contribution to green belt objectives. The uses and extent of development described are broadly consistent with those which would comply with Policy Env 10 on development in the green belt and would not, in my opinion, justify the loss of this area from the green belt. I do not consider that the establishment of a new boundary to the west or north would be preferable to those already established along the existing edge of the residential area.

23. For similar reasons I am not persuaded that Murrayfield hospital, including Beechwood House and its grounds, should be deleted from the green belt. I appreciate that Scottish Planning Policy through paragraph 51 states that local development plans should show the detailed boundary of any green belt, giving consideration to excluding existing settlements and major educational and research uses, major businesses and industrial operations, airports and Ministry of Defence establishments. I also note the comparison with Corstorphine Hospital and references to the screening provided by the tree-belt along Corstorphine Road.

24. There is some discretion in paragraph 51 of Scottish Planning Policy and the relative balance of uses on this site differs substantially from that at Corstorphine Hospital. Whilst this site includes modern development and car parking and is adjacent to the Holiday Inn it retains a significant proportion of green space which in my view continues to make an important contribution to the character and identity of the city in accordance with the objectives set out in paragraph 34 of the proposed plan. The open grassed areas which contribute to the setting of the listed building are more manicured in appearance than the land to the east but I consider the site has a clear function in maintaining the setting and landscape character of Corstorphine Hill. The woodland reflects the setting established along this section of Corstrophine Road. For these reasons I find the area should be retained in the green belt.

25. The footprint of the farm buildings at Hermiston extend to the rear of the established boundary of the village which has a mainly linear pattern of development comprising little more than a row of cottages within a countryside setting. Whilst the village is excluded from the green belt its rural setting is protected as part of the long established green belt on this edge of the city. I do not consider encroachment into the green belt or extension of the settlement boundary would be justified for this scale of site. I consider any future proposals for the site are more appropriately considered in the context of the relevant local development plan's policies including Policy Env 10.

26. Whilst the equestrian related development on Woodhall Road may be of a sizeable scale green belt policy allows proposals which require a countryside location and for countryside recreation. As an appropriate green belt activity I do not consider use as an equestrian centre justifies deletion of the site from the green belt. I find no reason to conclude that this area no longer contributes to green belt objectives or justification for

the existing green belt boundary to be changed. Green belt policy allows for conversion of existing buildings, ancillary development and intensifications of use. It is not unusual for the green belt to include housing and other uses and this is illustrated in other areas within the Edinburgh green belt. The objective is to maintain the integrity of the green belt and its boundary for the reasons set out in paragraph 34 of the proposed plan. For these reasons I consider that Lanark Road and the valley of the Water of Leith continue to form a robust and logical boundary to the green belt in this area. I note an additional matter raised in relation to the application of Policy Env 21 on flood protection but I find no basis to remove this designation given the location of part of this area relative to the Water of Leith.

27. Craigpark Quarry is in the countryside policy area where Policy Env 10 applies. I find no reason to differ from the conclusion in Issue 4 that the site is appropriately retained as countryside. Policy Env 10 provides an appropriate framework for the consideration of proposals for countryside recreation or where a countryside location is essential. The plan cannot cover every eventuality and I note that there are no other specific proposals for leisure, tourism or recreational uses.

28. I appreciate that West Mill Road includes residential properties and gardens. However I consider the area retains a distinct landscape character associated with the valley of the Water of Leith which extends as an important green corridor and important feature contributing to the landscape character and identity of the city. I consider this character would risk compromise if the current green belt designation were to be removed. This would run contrary to the objectives set out in paragraph 35 of the proposed plan. Given the importance of the Water of Leith corridor as a feature of the city and as a recreational route I consider it merits green belt designation rather than just reliance on other policies in the plan including Env 15 and Env 18. For this reason I consider the area around West Mill Road as shown in the map referenced 2476 should be retained in the green belt.

Gogarburn

29. Scottish Planning Policy through paragraph 51 states that local development plans should show the detailed boundary of any green belt, giving consideration to excluding existing settlements and major educational and research uses, major businesses and industrial operations, airports and Ministry of Defence establishments. The council justifies its decision to instead to include the site in the green belt and retain the A8 as a clear and defensible green belt boundary.

30. The key issue here is whether the site merits retention when considered against green belt objectives and whether in removing this site an alternative defensible green belt boundary could be established.

31. The significant built development associated with the bank is carefully integrated with its surroundings and screened from public view within a parkland and woodland setting. I consider this contributes to the landscaping setting on this major approach to the city when viewed from the A8. My conclusion on the proposed additional housing site east of Millburn Tower (Issue 14) accept the strength of the existing boundary along the bypass and the A8. In any event I consider there is a marked distinction between these open fields and the wooded policies further to the west. where a distinct wooded landscape setting is retained on this major approach into the City. nwhich effectively sddistinct setting on approach to the city merits green belt designation and continued

protection as such. Policy Emp 7 recognises the sites special economic importance. This would allow office and ancillary development and other uses compatible with the function of the site and green belt objectives. For these reasons I do not consider this land should be excluded from the green belt.

Other requests to add to the urban area

32. Paragraph 5.23 of National Planning Framework 3 refers in paragraph 5.23 to reconfiguration of land use around Edinburgh Airport to accommodate future expansion and to relocate the Royal Highland Showground. Reference is made to land south of the A8. In response to this the council has identified this area of land on the south side of the A8 to be safeguarded for the re-location of the showground to enable future expansion of Edinburgh Airport.

33. Given my conclusions above regarding the Royal Bank of Scotland site and the need to secure continuity of the green belt to the west of the bypass I consider this area continues to meet green belt objectives. It is contained within an area of distinctly rural character between the city and Ratho Station. I consider its safeguarded status reflects the contribution that it continues to make to green belt objectives whilst recognising that its development would be justified to accommodate a development of national importance. Until such future proposals are confirmed retention in the green belt avoids any pressure to release part or all of the area for alternative uses. Consequently, I find there are sensible reasons to retain the site in the green belt at this stage and that the safeguarding approach is sufficient to ensure consistency with national policy.

Existing Housing Sites

34. HSG 7 is land associated with Edinburgh Zoo. I consider this is a particularly sensitive site given its mature woodland setting and existing location in the green belt adjacent to the Corstorphine Hill Nature Conservation Reserve. Retention in the green belt reflects the position in the current local plan and my conclusions through Issue 6.

35. My assessment of the proposed housing site at Cammo is set out in Issue 7 where I conclude that the identified landscape impacts are not sufficient to warrant deletion of the housing proposals or retention of the site in the green belt. The need for housing including release of land within the green belt is established through SESplan.

Special Landscape Areas

36. These areas are identified to protect Edinburgh's unique and diverse landscape which contributes to the city's distinctive character and scenic value. These are local designations and statements have been prepared to set out the essential qualities and characteristics of these areas along with the potential for enhancement.

37. Paragraph 197 of Scottish Planning Policy explains the purpose of areas of local landscape value should be to:

- safeguard and enhance the character and quality of a landscape which is important or particularly valued locally or regionally; or
- promote understanding and awareness of the distinctive character and special qualities of local landscapes; or
- safeguard and promote important local settings for outdoor recreation and tourism.

38. I have assessed part of the land to the south of Frogston Road East and north-east of the pylon line as a potential housing site through Issue 14. I note the council's view that this area, despite not meriting designation as a Special Landscape Area, should be retained in the green belt. The functions of these two designations share consideration of landscape issues but for the green belt this is a more strategic function in containing growth and protecting the wider setting of the city. The area further to the west has been recognised due to its local landscape qualities providing a setting and landscape framework associated with Morton Mains Conservation Area to the west and the policies associated with Mortonhall to the north.

39. I do not consider these special qualities are evident in the more open farmland to the east or along Broomhills Road. This does not undermine the role of Broomhills Road as the green belt boundary nor its role as a recreational route which I recognise through Issue 14. Given these conclusions I find this area does not merit inclusion within the Special Landscape Area.

40. The plan's policies can only apply to the retention, protection and planting of trees as part of any development proposal. In this context Policy Env 12 would apply. Wider proposals for landscape enhancement or management would fall to others to address.

41. The site at Craigcrook Road is assessed through Issue 17 and I rely on the conclusions there that the site currently contributes significantly to the setting of Corstorphine Hill's wooded ridgeline and also Hill Park to the north. I consider the hill and parkland trees associated with the Craigcrook Castle non-Inventory designed landscape, conform to the characteristics and qualities of the proposed Corstorphine Hill Special Landscape Area. I find no reason to conclude that the boundary of the Special Landscape Area should exclude this site.

42. On the matters raised by the Cockburn Association I note that the Reporter's Decision (referenced PPA-230-2041, Land 260 metres south of Dreghorn Loan) determined the principle of development at Dreghorn Polo-fields. I understand that as part of that decision the developer was required to prepare and implement a Woodland Management Scheme for Covenanters Wood. This was to enable greater opportunities for public access and informal recreation. Following this the council has secured a new linear park to the west of the site and retention of a viewpoint towards the Pentland Hills. These measures were required to mitigate the impact of development upon recreation and the local landscape. With regard to the Local Nature Conservation Site I note that there was nothing to indicate the proposal would impact upon protected species. Habitat improvement measures across the wider Local Nature Conservation Site included implementation of the Woodland Management Scheme at Covenanters Wood.

43. A review of the boundaries of Local Nature Conservation sites is to be carried out through the next local development plan. However, in relation to this Special Landscape Area I consider that its character derives from the wider area encompassing the housing but also the valley of the Braid Burn and Covenanters Wood. It also relates to the former Dreghorn Castle non-Inventory designed landscape. The area includes remnants of that landscape within the urban area and on the lower slopes of the Pentland Hills. Consequently, I do not consider any change is required to the proposals map or to paragraph 38 of the plan.

44. Turning to the land at Cockburn Crescent within Special Landscape Area 9, I accept that the fields referred to relate to some extent to the character of the urban edge to the

north. However they form part of the farmland and associated shelterbelts on this area of upland fringe. It is associated with the non-Inventory designed landscapes to the south and west of Balerno. These fields maintain an open view to the skyline of the Pentland Hills to the south and west of Balerno. The tree belt to the south is fragmented and I am satisfied that there is a clear boundary to the Special Landscape Area. For these reasons I do not consider any change is required. Given the location of these fields between the urban edge and the more open view through the tree-belt to the south I am not persuaded that development would enhance views to the Pentlands. The suitability of this site for housing is assessed through Issue 16.

45. I agree with the council that the ownership of the land is not relevant to the Special Landscape Area designation. For the Craiglockhart area I understand the important character reflects the extent of the Craiglockhart Hills' landform, the grounds of former manor houses and institutions sited on the Hills, including the former Edinburgh Hydropathic Hospital and the valley of Glenlockhart, between Easter and Wester Craiglockhart Hill. The designation which aims, in association with Policy Env 11, to protect landscape character and quality reflects considerations beyond those which would apply purely to the setting of a Listed Building. Consequently, I consider there is no case to remove this local designation from the land in the university's ownership at Craiglockhart. The policy does not presume against development but rather to control proposals which would have a significant adverse impact on the special character or qualities of the area.

46. My assessment of the development potential of the Drum estate is set out in Issue 14 where my conclusions also reference the Simpson & Brown Conservation Plan. The representations refer to the methodology for establishing these designations questioning compliance with best practice as established by Scottish Natural Heritage. I understand from the council's submissions that its method followed 'Guidance on Local Landscape Designations' published by Scottish Natural Heritage and Historic Scotland but also responds to Edinburgh's local circumstances. Given that this is a local designation I find the principle of application to local circumstances is appropriate and acceptable so long as the assessment criteria are consistently applied. For Edinburgh I consider it appropriate to consider not only landscape character and quality but also any contribution to the World Heritage Site, protection of important views and the landscape setting of the City and its key features.

47. I note from the council's assessment that The Drum was ranked within the top-third of sites included in this designation. This does not suggest to me that its inclusion was marginal or that it would have been excluded if a higher threshold of "quality" had been applied. As referenced in my assessment of the Drum in Issue 14 and as evidenced by the conclusions of Historic Scotland, albeit in the different context of the Historic Designed Landscape, the presence of pockets of lower quality land must be considered in the context of the integrity and character of the site as a whole and its wider contribution as part of a network of structural landscape and open space.

48. In this context, I accept the council's view that open areas of land can have an important function and value in establishing the setting of more structured historic landscapes. From the submissions I find nothing to suggest that the designation of the Drum as a Special Landscape Area has not been consistently applied as it has to Holyrood Park, Duddingston House and Prestonfield, Craigmillar Castle and the South East Wedge Parkland. Along with these other areas I consider the Drum has a clear role in contributing to the structural wedge of open landscape and green space to the

southeast of the city.

49. Drawing together all of the above I find nothing to suggest that this local landscape designation has been inappropriately or inconsistently applied in the context of the Drum.

50. For Murrayfield Hospital similar conclusions apply as to those above on the green belt status of the site. As part of Corstorphine Hill the area makes a long established and important contribution to the setting of the city. The house sits within established landscaped grounds associated with the Beechwood House non-Inventory designed landscape. Recognition of the special landscape qualities of this area reflect its previous inclusion in the Corstorphine Hill Area of Great Landscape Value. There are no substantive changes to the boundaries of this area and I find nothing to suggest that its special landscape qualities have diminished or that it does not warrant inclusion within this local landscape designation. Drawing on my conclusions in paragraph 21 above I find the open space designation on the areas of lawn are justified as Policy Env 18 applies not only to public open space but also to protect areas which contribute to the amenity of their surroundings and to the city's landscape character.

Reporter's recommendations:

Modify the proposed plan as follows:

1. Amend the green belt on the proposals map and as relevant elsewhere in the plan to take account of the recommendations as set out in Issues 14, 15 and 16.

Issue 3	**Other Environmental Designations**	
Development plan reference:	**Part 1 Section 2 pages 9 – 17** **Glossary**	**Reporter:** Richard Bowden

Body or person(s) submitting a representation raising the issue (including reference number):

0003 Steuart Campbell	2246 Mactaggart & Mickel Homes
0124 sportscotland	2265 Springfield Properties plc
0165 Ken Shade	2297 Friends of Craighouse
0170 Balerno Community Council	2402 West Craigs Ltd
0225 Cramond & Barnton Community Council	2408 HolderPlanning Ltd
0480 Currie East Neighbourhood Watch	2463 Euan Leitch
0799 NHS Lothian Public Health & Health Policy	2572 Royal Bank of Scotland
1124 Liberton Association	2683 Scottish Enterprise
1154 CALA Management Ltd	2693 Spire Healthcare Ltd
1159 New Ingliston Limited	2696 James R S Brownwight
1342 Iain Proudfoot	2697 Scottish Natural Heritage
1351 Friends of Cammo	2699 Scottish Environment Protection Agency
1743 Thistle Timbers	2715 Merchiston Community Council
1973 Morningside Community Council	
2119 Colinton Country Cattery	47 individuals submitted representations on 'Seven Hills' (See Issue 3 Appendix A)
2126 Cockburn Association	
2192 Edinburgh Bioquarter Partners	53 individuals submitted representations on 'Craighouse' (See Issue 3 Appendix B)

Provision of the development plan to which the issue relates:	This issue covers representations relating to Part 1 Section 2 of the Plan (A Plan to Protect and Enhance the Environment), except green belt and local landscape areas, which are covered in Issue 2.

Planning authority's summary of the representation(s):

CONTEXT

The Main Issues Report in Chapter 9 set out the changes the Council proposed in relation to natural heritage designations and other environmental proposals including green space proposals. These changes were necessary to reflect recent updates to methodology and national policy.

At the first Proposed Plan stage the Council received a large number of representations relating specifically to the Local Nature Conservation Site designation at Craighouse. Since the first Proposed Plan, planning applications have been determined for this site. A number of representations have been received to the Second Proposed Plan relating to this designation.
Representations have been received on other matters, including:

- Climate Change
- World Heritage Site

- Conservation Areas
- Inventory of Gardens and Designed Landscapes
- Seven Hills
- Trees and woodland
- Flooding
- Green Network
- Open Space designation

Climate Change

- Amend the wording of paragraph 18 3rd bullet to be more consistent with Policy RS 1 and to provide clarity and reflect the increasing concerns about the need to increase home grown food production. Considers also that paragraph 18 4th bullet '....no adverse impact...' is too weak a qualification and is open to generous interpretation. Suggests changing the 4th bullet to 'supports the adaptation of existing homes...in conservation areas provided this does not damage their historic character and appearance.' **(2126 Cockburn Association)**

World Heritage Site

- The proposed Forth Bridge World Heritage Site is not mentioned at all, however, the site is likely to be inscribed during the lifetime of the Plan. If this happens, it is critical that the site be afforded the same protection to its Outstanding Universal Value and setting as the existing World Heritage Site. The LDP is the tool for achieving this, through referencing the status and management plan in the same way as the existing World Heritage Site. **(2463 Euan Leitch)**

Conservation Areas

- As the number of Conservation Areas in Edinburgh tends to change on a fairly regular basis, it is recommended that the number of Conservation Areas (49) is removed from the Plan. Alter the wording to align better with the wording of the primary legislation (Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997). **(2463 Euan Leitch)**

Inventory of Gardens and Designed Landscapes

- Suggests adding the following to the last sentence '...proposals without harming the overall character of the inventory site.' **(2126 Cockburn Association)**

Seven Hills

- The following paragraph has not been carried forward from the Edinburgh City Local Plan and states that there is nothing equivalent to replace it: 'Underpinning its success, setting it apart from almost all other cities in the world, is the quality and drama of its environment...There are many other designated areas of architectural, historic, landscape and nature conservation interest, a large number of listed buildings, archaeological sites and monuments. Also...the accessibility of the surrounding hills, countryside and coastal areas is part of its attraction, to residents and many of its business leaders.' In this regard, it is considered that the Plan is very weak on the protection of Edinburgh's seven hills and urban green

sites. It is, therefore, suggested that the mentioning of Edinburgh's character, environment and seven hills is reinstated in the Plan. **(2297 Friends of Craighouse; 2715 Merchiston Community Council; 47 individuals listed in Issue 3 Appendix A)**

Trees and Woodland

- Amend paragraph 40 in Part 1 Section 2 of the Plan by adding in 'opportunities will be taken to deliver the Strategy through greenspace proposals and management of the woodland resource throughout the city'. It is important that the Plan makes clear the contribution of the Edinburgh and Lothians Forestry Strategy to planning. Adding the above text would make clear this link. **(2697 Scottish Natural Heritage)**
- Suggests amendments to paragraph 40 of the Plan. Considers that substantial tree and shrub planting is a key mitigation measure for a wide variety of developments. **(2126 Cockburn Association)**

LNCS Designations

- Suggest altering the designation of part of Dovecot Park that lies north of Dovecot Grove, to a Local Nature Conservation Site. This correction was required by the Reporter to the previous Inquiry to the Edinburgh City Local Plan. **(0003 Steuart Campbell)**
- Objects to the Local Nature Conservation Site designation on Easter Bavelaw Farm access road and fields to the south. Concerned that Policy Env 15 places additional restrictions on the use of agricultural land. Raises concerns about the content of the survey carried out in 2009. **(0165 Ken Shade)**
- Support the extension of LNCS boundaries at Balerno under policy Env 15. **(0170 Balerno Community Council)**
- Remove land at Craigcrook Road from the protection of Policy Env 15 to allow for residential development. Considers that the constraints evident on the nearby Hillpark Rise are not applicable to this site. However, notwithstanding this objection, it is stated that the proposals demonstrate limited and sensitive residential which would comply with Policy Env 15 if it continues to apply to the site. **(1154 CALA Management Ltd)**
- Remove the site at Burdiehouse from the Local Nature Conservation site and identify as a development opportunity. The site is a former garden area, surrounded by a low stone wall. The site is stated as being overgrown but has no flora, fauna, landscape or geological features of any interest. **(2696 James RS Brownwright)**

Craighouse

- Object to the reduction of the Local Nature Conservation Site on the grounds of biodiversity. Considers instead that the boundary of the existing Local Nature Conservation Site should be reinstated to include the entire estate at Craighouse. **(0193 Morningside Community Council; 2297 Friends of Craighouse; 53 individuals listed in Issue 3 Appendix B)**

Flooding

- Concerned that the Plan states that development will be permitted in high risk flooding areas as long as flood risk is considered and addressed. Considers the health and social impact of flooding are negative. The level of flood defence should be specified at a high level for any developments in a high risk flooding area. Requests that the Council should specify that flood prevention actions have to be completed before construction or development starts rather than just be indicated in planning applications. **(0799 NHS Lothian Public Health & Health Policy)**
- Requests that the Area of Importance for Flood Management be amended from the area north of the boundary of application 14/00437/FUL (154 Woodhall Road) and the south bank of the Water of Leith. It is stated that this area has never flooded since records began. **(2119 Colinton Country Cattery)**
- Suggests amending paragraph 43 except for the 1st sentence. Considers that this paragraph does not make any mention of the importance of well designed afforestation of the water catchments of the main rivers, does not state that development should not be permitted within important flood management areas and/or areas of medium to high risk of flooding, and does not set out criteria for building design to minimise flood damage and risk to human life. **(2126 Cockburn Association)**

Green Network

- Add text to paragraph 52 of the Plan, which states 'Any greenspace aspirations must be balanced by the requirement for the related developments to be economically viable'. Considers that greenspace aspirations must be balanced by the requirements to be economically viable. Open Space is not necessary along the entire A8 corridor when the tram line already acts as a physical screening along with existing built environment. **(2402 West Craigs Ltd)**
- Add an active travel reference to the fourth bullet of paragraph 50 to make clearer the reference to active travel as a contributor to the Green Network – 'providing for a range of different recreational and active travel uses which promote healthy living'. **(2697 Scottish Natural Heritage)**
- Supports paragraph 48-54 as written. **(2126 Cockburn Association; 2699 Scottish Environment Protection Agency)**

Greenspace Proposal - omission

- Suggests that Mauseley Hill, Cammo Water Tower and adjacent land be added to table 1 as a new greenspace proposal, forming a logical extension to managed greenspace at Cammo Estate. They were historically part of Cammo Estate, the area is used informally for recreation and the Water Tower is an important scenic and cultural heritage feature in West Edinburgh. Considers that the development briefs for the Maybury and Cammo sites should require developers' contributions towards recreational and access management and improvements to amenities at Cammo Estate and Mauseley Hill greenspace. **(0225 Cramond & Barnton Community Council; 1351 Friends of Cammo)**

Greenspace Proposals - general

- Considers that is difficult to see how greenspace proposal GS 9 can be considered

part of a network of greenspace when it would have once been part of a larger greenspace, i.e. the green belt. Considers that GS 9 will lead to the fragmentation of habitats which Policy Env 18 should guard against. **(1124 Liberton Association)**

- Amend greenspace proposal GS 6 on the Proposals Map to properly reflect the extent of the greenspace as defined in the 2011 West Edinburgh Landscape Framework. **(1159 New Ingliston Limited)**
- Amend greenspace proposals GS 1, GS 6 and GS 9 in table 1 of Part 1 Section 2 of the Plan. Requests that GS 1 be significantly expanded in the vicinity of the Union Canal. Considers that location, size, shape and linkages of GS 6 will require careful design at masterplan stage. Considers that GS 9 is too small and does not reflect the convex shapes of the landform in this area. **(2126 Cockburn Association)**

Open Space Designation

- Requests that Muir Wood Field be identified as open space in the Plan as there is local interest in providing recreational areas, provision of allotments, community woodland and exercise areas. Considers Muir Wood Field as an essential buffer between the villages of Juniper Green and Currie. **(0480 Currie East Neighbourhood Watch; 1342 Iain Proudfoot)**
- Seeking removal of the open space designation on land at Craigcrook Road. It is stated that two open space benefits will arise from the development – public access and new public open space along the frontage with Craigcrook Road. However, notwithstanding this objection, it is stated that the proposals demonstrate limited and sensitive residential development which would comply with Policy Env 18 if it continues to apply to the site. **(1154 CALA Management Ltd)**
- Seeking removal of the open space designation on land at Hillpark Avenue/Craigcrook Road. States that the land does not perform a function as valuable open space as it is not publically accessible, and not connected to the Green Network. **(2246 Mactaggart & Mickel Homes)**
- Remove the open space designation across the area of lawn at Murrayfield Hospital as the site is already protected due to it being a Category A Listed building. Considers that the open space has extremely limited influence on the surrounding neighbourhood. **(2693 Spire Healthcare Ltd)**
- Amend the Proposals Map by removing Eyre Place gap site from the open space designation on the Proposals Map. RBS is currently proposing a mixed-use re-development of this site. Suggests that a new Open Space Audit be carried out to inform the preparation of the LDP and the value of open space designation at Eyre Place be re-assessed. The value of this 'open space' is not considered significant and it is expected that policies in the Plan will secure the delivery of replacement open space to compensate for the removal of the designation. **(2572 Royal Bank of Scotland)**

Greenspace Proposal GS 4 and Edinburgh BioQuarter

- Supports greenspace proposal GS 4. **(2126 Cockburn Association)**
- Object to greenspace proposal GS 4 (South East Wedge Parkland) and request that the boundary be amended to remove a small area of land adjacent to Thistle Timbers. It is stated that there is Committee support for removing this from GS 4. Furthermore, Head of Planning has accepted that there are special circumstances

in the case relating to the economic development needs of an existing business to have space to expand, and the need to ensure that this business and its associated jobs remain in Edinburgh. **(1743 Thistle Timbers)**

- Requests that a more urban parkland approach should be adopted in relation to the South East Wedge Parkland. Amend the text associated with GS 4 in table 1 to 'The land around Craigmillar/Greendykes retained in the green belt will be landscaped to provide multifunctional parkland, woodland and paths linking with parallel developments in Midlothian.' Therefore, suggests removing the word 'country' before 'paths'. Through the masterplan and finalised Supplementary Guidance, that 'a higher density, more urban form of development than previously planned' is acceptable. **(2192 Edinburgh Bioquarter Partners)**
- Requests that the Local Nature Conservation Site boundary on the Proposals Map be amended to reflect the Finalised BioQuarter Supplementary Guidance. The amendment should reflect the area identified as 'retained landscape' within the Finalised Supplementary Guidance. Considers that the current drafting of the Proposals Map is overly restrictive and unnecessarily constrains future phases of the Edinburgh BioQuarter development. **(2192 Edinburgh Bioquarter Partners; 2683 Scottish Enterprise)**
- Add a new principle to the BioQuarter Development Principles on page 68 Part 1 Section 5 of the Plan which states 'Extensive tree planting on the prominent and sensitive upper slopes to link with existing trees on the Edmonstone hill skyline and to provide settings for buildings and help blend them in with their surroundings'. **(02126 Cockburn Association)**
- Amend greenspace proposal GS 4 to exclude the Wisp (North) and allocate the site for housing (see Issue 14). Development of this site would not impact adversely on the delivery of the strategic greenspace network within the South East Wedge. In terms of recreation and nature conservation the site does not match the quality and importance of other sites within the South East Wedge. **(2265 Springfield Properties plc)**
- Amend greenspace proposal GS 4 to exclude the site at Edmonstone and allocate the site for housing (see Issue 14). States that the land forms a relatively small part of the area subject to this proposal and thus, does not believe that there is any prospect that it can be developed as a parkland, as envisaged. The site is currently fenced off because of danger presented by undermining. **(2408 HolderPlanning Ltd)**

<u>Miscellaneous</u>

- Add in reference to the Built Heritage Strategy to paragraph 22 to add consistency with other references to other strategies in the Plan. **(2463 Euan Leitch)**

<u>Glossary</u>

- Consider that clarity is needed in relation to the following definitions in the glossary – 'Countryside Recreation' and 'Green Networks'. Considers that it is important to be clear on the definition of 'Countryside Recreation', referring specifically to the type of development proposals which might be associated with such a use. Furthermore, the definition of Green Networks should state that they extend outwith the urban area into the wider countryside to ensure consistency with that outlined in paragraph 46 of the Plan, on page 15 and with paragraph 150 of Scottish Planning Policy. **(sportscotland 0124)**

Modifications sought by those submitting representations:

Climate Change

- Amend the wording of paragraph 18 3rd bullet to end 'provided these do not endanger the natural and cultural heritage assets of the area'. Also, amend last part of the 4th bullet to read '...in conservation areas provided this does not damage their historic character and appearance'. **(2126 Cockburn Association)**

World Heritage Site

- Suggests that the section title 'Old and New Towns of Edinburgh World Heritage Site' in Part 1 Section 2 page 10 be amended to 'World Heritage Site' to account for the possible inclusion of the proposed Forth Bridge World Heritage Site. Recommend also that the first sentence of paragraph 23 is amended to state 'One of Edinburgh's most widely acclaimed assets is its internally important World Heritage status'. In addition, suggests including a paragraph at the end of this section which states 'The nomination for the Forth Bridge to become a World Heritage Site will be submitted to UNESCO in early 2014 and a decision expected in 2015. A Management Plan will be prepared for the Site, which may be a material consideration for decisions on planning matters'. **(2463 Euan Leitch)**

Conservation Areas

- As the number of Conservation Areas in Edinburgh tends to change on a fairly regular basis, it is recommended that the number of Conservation Areas (49) is removed from the Plan. Also suggests amending the text in the second line under 'Conservation Areas' to 'These are areas of special architectural or historic interest, the character or appearance of which should be preserved or enhanced'. **(2463 Euan Leitch)**

Inventory of Gardens and Designed Landscapes

- In paragraph 29, suggests adding the following to the last sentence '...proposals without harming the overall character of the inventory site.' Considers that, as it stands, it is not clear whether the statement in the last sentence of paragraph 29 is protecting or developing inventory sites. **(2126 Cockburn Association)**

Seven Hills

- Reinstate mentioning of Edinburgh's character and environment and seven hills. **(2297 Friends of Craighouse; 2715 Merchiston Community Council; see Appendix B)**

Trees and Woodland

- Amend paragraph 40 by adding in 'opportunities will be taken to deliver the Strategy through greenspace proposals and management of the woodland resource throughout the city'. It is important that the Plan makes clear the contribution of the Edinburgh and Lothians Forestry Strategy to planning. Adding the above text would make clear this link. **(2697 Scottish Natural Heritage)**

- Amend the 3rd line of paragraph 40 by inserting 'as well as carbon sequestration' after 'benefits'. Amend line 6 after '...creation and...' by inserting '...effective management to increase and maintain healthy woodland cover...' Amend line 7 after 'links' by adding a new sentence 'The LDP seeks to implement this important strategy through site briefs, development principles and masterplans for development proposals.' **(2126 Cockburn Association)**

LNCS Designations

- Suggest altering the designation of part of Dovecot Park that lies north of Dovecot Grove to a Local Nature Conservation Site. **(0003 Steuart Campbell)**
- Objects to the Local Nature Conservation Site designation on Easter Bavelaw Farm access road and fields to the south. **(0165 Ken Shade)**
- Remove land at Craigcrook Road from the protection of Policy Env 15. **(1154 CALA Management Ltd)**
- Remove the site at Burdiehouse from the Local Nature Conservation site. **(2696 James RS Brownwright)**

Craighouse

- The boundary of the existing Local Nature Conservation Site should be reinstated to include entire estate at Craighouse. **(1973 Morningside Community Council; 2297 Friends of Craighouse; see Appendix A)**

Flooding

- No specific modifications requested. However, states that the level of flood defence should be specified at a high level for any developments in a high risk flooding area. Requests that the Council should specify that flood prevention actions have to be completed before construction or development starts rather than just be indicated in planning applications. **(0799 NHS Lothian Public Health & Health Policy)**
- Requests that the Area of Importance for Flood Management be amended from the area north of the boundary of application 14/00437/FUL (154 Woodhall Road) and the south bank of the Water of Leith. **(2119 Colinton Country Cattery)**
- No specific modifications requested. However, suggests amending paragraph 43 except for the 1st sentence. **(2126 Cockburn Association)**
- Support the opening sentence of paragraph 43. **(2699 Scottish Environment Protection Agency)**

Green Network

- Suggests adding text to paragraph 52 of the Plan, which states 'Any greenspace aspirations must be balanced by the requirement for the related developments to be economically viable'. **(2402 West Craigs Ltd)**
- Add an active travel reference to the fourth bullet of paragraph 50 to make clearer the reference to active travel as a contributor to the Green Network – 'providing for a range of different recreational and active travel uses which promote healthy living'. **(2697 Scottish Natural Heritage)**

Greenspace Proposal - omission

- Suggests that Mauseley Hill, Cammo Water Tower and adjacent land be added to table 1 as a new greenspace proposal, forming a logical extension to managed greenspace at Cammo Estate. **(0225 Cramond & Barnton Community Council; 1351 Friends of Cammo)**

Greenspace Proposals - general

- Considers that when land is removed from the green belt and a small part of a site is designated as 'open space' this should not be described as an improvement of 'the quantity and quality of open space in Edinburgh'. This is in specific reference to greenspace proposal GS 9 at Broomhills. Considers that it is difficult to see how GS 9 can be considered as part of a network. **(1124 Liberton Association)**
- Amend greenspace proposal GS 6 (IBG Open Space) on the Proposals Map to properly reflect the extent of the greenspace as defined in the 2011 West Edinburgh Landscape Framework. **(1159 New Ingliston Limited)**
- Amend greenspace proposals GS 1 (Dalry Community Park), GS 6 (IBG Open Space) and GS 9 (Broomhills Park) in table 1 of Part 1 Section 2 of the Plan. Requests that GS 1 be significantly expanded in the vicinity of the Union Canal. Considers that location, size, shape and linkages of GS 6 (IBG Open Space) will require careful design at masterplan stage. Considers that GS 9 (Broomhills Park) is too small and does not reflect the convex shapes of the landform in this area. **(2126 Cockburn Association)**

Open Space Designation

- Request that Muir Wood Field be identified as open space in the Plan. **(0480 Currie East Neighbourhood Watch; 1342 Iain Proudfoot)**
- Remove the open space designation on land at Craigcrook Road. **(1154 CALA Management Ltd)**
- Remove the open space designation at Hillpark Avenue/Craigcrook Road. **(2246 Mactaggart & Mickel Homes)**
- Remove the open space designation across the area of lawn at Murrayfield Hospital. **(2693 Spire Healthcare Ltd)**
- Amend the Proposals Map by removing the open space designation from the Eyre Place gap site. **(2572 Royal Bank of Scotland)**

Greenspace Proposal GS 4 and Edinburgh BioQuarter

- Object to greenspace proposal GS 4 (South East Wedge Parkland) and request that the boundary be amended to remove the small area of land adjacent to Thistle Timbers (plan provided to support representation). **(1743 Thistle Timbers)**
- Requests that a more urban parkland approach should be adopted in relation to the South East Wedge Parkland. Amend the text associated with GS 4 in table 1, by removing the word 'country' when referring to 'paths'. **(2192 Edinburgh Bioquarter Partners)**
- Requests that the Local Nature Conservation Site boundary on the Proposals Map be amended to reflect the Finalised Bioquarter Supplementary Guidance. **(2192 Edinbrugh Bioquarter Partners; 2683 Scottish Enterprise)**
- Add a new principle to the BioQuarter Development Principles on page 68 Part 1

Section 5 of the Plan which states 'Extensive tree planting on the prominent and sensitive upper slopes to link with existing trees on the Edmonstone hill skyline and to provide settings for buildings and help blend them in with their surroundings'. **(2126 Cockburn Association)**

- Amend greenspace proposal GS 4 to exclude the Wisp (North) and allocate the site for housing (see Issue 14). **(2265 Springfield Properties plc)**
- Amend greenspace proposal GS 4 to exclude the site at Edmonstone and allocate the site for housing (see Issue 14). States that the land forms a relatively small part of the area subject to this proposal and thus, does not believe that there is any prospect that it can be developed as a parkland, as envisaged. The site is currently fenced off because of danger presented by undermining. **(2408 HolderPlanning Ltd)**

Miscellaneous

- Add in reference to the Built Heritage Strategy into paragraph 22 to add consistency with other references to other strategies in the Plan. Suggests adding 'The Edinburgh Built Heritage Strategy aims to ensure an understanding of Edinburgh's heritage assets in order that they can be protected and conserved for existing and future generations, and managed in a co-ordinated and structured manner.' **(2463 Euan Leitch)**

Glossary

- Consider that clarity is needed in relation to the following definitions in the glossary – Countryside Recreation and Green Networks. Recommend that the heading for Countryside Recreation in the Glossary on page 128 be re-entitled Outdoor Recreation with the following definition 'Passive or active recreational pursuits dependent on or derived from the use of the natural environment for their practice. Such activities require a range of buildings, structures and facilities from paths to slipways, changing to equipment storage and climbing walls to dry ski slopes.' Amend also the definition of Green Networks to ensure the definition is consistent with that outlined in paragraph 46 of the Plan, on page 15 and with paragraph 150 of Scottish Planning Policy. It should be revised to state that they extend outwith the urban area into the wider countryside. **(sportscotland 0124)**

Summary of responses (including reasons) by planning authority:

Climate Change

- Any planning application for renewables would be assessed against the Design and Environment policies in Part 2 of the Plan, so adding in the suggested text is unnecessary. No modification proposed. **(2126 Cockburn Association)**

World Heritage Site

- A decision has not been issued as to whether the Forth Bridge will be designated a World Heritage Site. For this reason, it is premature to amend the title from 'Old and New Towns of Edinburgh World Heritage Site' to 'World Heritage Site' and make reference to the Forth Bridge. A decision is expected at the 29th session of the World Heritage Committee between 28th June and 8 July 2015. Following the

decision in June/July, the Council sees merit in making these changes; including amending the Proposals Map. At present, no modification proposed. **(2463 Euan Leitch)**

Conservation Areas

- No modifications proposed, however, the Council sees merit in this representation to remove the specific number (49) of Conservation Areas from the Plan. **(2463 Euan Leitch)**

Inventory of Gardens and Designed Landscapes

- This paragraph within Section 1 provides a background context to the policy issue. The intent of Policy Env 7 Historic Gardens and Designed Landscapes is clearly set out in Part 2 of the Plan. No modification proposed. **(2126 Cockburn Association)**

Seven Hills

- The role of the quoted paragraph in the Edinburgh City Local Plan has been taken in the LDP by paragraph 19 on page 9 in Part 1 Section 2 of the Plan, which states 'Edinburgh's natural and historic environment contributes to its distinctive character, local appeal and world-wide reputation. The City lies between the internationally important habitat of the Firth of Forth and the dramatic backdrop of the Pentland Hills Regional Park. The Old and New Towns of Edinburgh World Heritage Site and Edinburgh's conservation areas comprise architecturally significant neighbourhoods and villages, together with many individual listed buildings. These interact with the city's open hills and wooded river valleys, to create a unique and diverse townscape. The LDP area supports a range of protected plants and animals and also contains archaeological remains providing valuable evidence of how we used to live.'

  The LDP sets out a more concise approach to supporting text than its predecessor Local Plans, however, this does not diminish the protection to sites afforded by Policy Env 11, which remain an important but non-statutory designation. In line with guidance produced by Historic Scotland and Scottish Natural Heritage, the Council approved a comprehensive 'Review of Local Landscape Designations' in 2010. This introduced the concept of 'Statements of Importance' to set out the essential qualities and characteristics of a local landscape designation and provide a stronger basis upon which to determine planning applications affecting these sites.

  In the Local Development Plan, emphasis is placed upon the diversity of landscapes found across both the Rural West Edinburgh Local Plan area and Edinburgh City Local Plan area, now recognised as part of 22 Special Landscape Area proposals. These represent a 10% increase in land covered by local landscape designations and seek to secure the recognition, protection and stewardship of Edinburgh's distinctive landscape setting.

  The following hill and ridgeline terrain is encompassed by Special Landscape Area proposals: Dundas Castle and Dundas Hill, the Ratho Hills, the northern slopes and summits of the Pentland Hills, Corstorphine Hill, Easter and Wester

Craiglockhart Hills, Castle Rock, Calton Hill, Holyrood Park – including Arthur's Seat and Salisbury Crags, Craigmillar Castle, The Drum, Edmonstone, Blackford Hill and The Braid Hills, and Craigie Hill.

Policy protection to many urban landscape features is additionally afforded by Policy Env 18. No modification proposed. **(2297 Friends of Craighouse; 2715 Merchiston Community Council; see Appendix B)**

Trees and Woodland

- No modifications proposed, however, the Council sees merit in the representation by adding 'opportunities will be taken to deliver the Strategy through greenspace proposals and management of the woodland resource throughout the city' to paragraph 40. The Council agrees that it is important that the Plan makes clear the contribution of the Edinburgh and Lothians Forestry Strategy to planning. **(2697 Scottish Natural Heritage)**
- This is set out under the heading of 'Climate Change' in paragraph 18 as part of the Green Network but accept that it is not expressly referred to under trees and woodlands. The 'Edinburgh and Lothians Forestry and Woodlands Strategy' does not contain site specific recommendations. Rather, the Plan will contribute to the objectives of the Strategy by assessing proposals against design and environmental policies, whilst requiring new housing allocations to provide new woodland to achieve a suitable fit between development and the surrounding landscape and to extend the Green Network. No modification proposed. **(2126 Cockburn Association)**

LNCS Designations

- The area of land in question is protected by Policy Env 18, as designated in the adopted Edinburgh City Local Plan.

Dovecot Park (including the north part as questioned in the representation) was included in the Edinburgh City Local Plan as both open space and a Local Nature Conservation Site, as recommended by the Reporter at the Inquiry into the Plan.

The LNCS designation on the Proposals Map comprises both Local Geodiversity Sites and Local Biodiversity Sites. Designation of Local Biodiversity Sites in the Local Authority area is a process managed by the Local Biodiversity Site Steering Group, on which relevant specialist organisations, including the Council, are represented. Site reviews and boundary corrections are an ongoing process and in November 2012 the Local Biodiversity Site Steering Group reviewed the boundary for the Dells LBS. The Guidance for what should be included in a Local Biodiversity Site has also been reviewed and made more rigorous in the period between 2006 and 2012. The relevance here is that playing fields are no longer included unless we have notable biological records for these areas. There are no notable biological records for the areas in question, so the Local Biodiversity Site Steering Group agreed that they should be removed from the site. Dovecot Park playing fields remain a Local Geodiversity Site which is why it appears as a Local Nature Conservation Site on the Proposals Map. No modification proposed. **(0003 Steuart Campbell)**

- The Local Nature Conservation Site at Balerno was reassessed following a similar representation received to the first Proposed Plan. The slope has been removed from the site and the quarry on Hare Hill included. These changes affect land in

Edinburgh and Midlothian. However, there is no justification for the other suggested changes. Furthermore, Policy Env 15 is not restrictive to agricultural practices. No modification proposed. **(0165 Ken Shade)**

- The land at Craigcrook is identified as 'Other Semi-Natural Greenspace' in the Council's Open Space Audit (2009). There is no justification for removing the Local Nature Conservation Site designation from this area as neutral grassland (unimproved) with broadleaved trees has biodiversity benefit as a habitat, which should be protected. No modification proposed. **(1154 CALA Management Ltd)**
- The site is within the Niddire Burn Complex, Local Biodiversity Site and adjacent to the Burdiehouse Burn Valley Park Local Nature Reserve. At this time there is no justifiable reason to change the status of this part of the site. **(2696 James RS Brownwright)**

Craighouse

- The Council considered similar representations to the first Proposed Plan. That process has included seeking advice from its partners. The part of the Local Nature Conservation Site referred to in these representations has been reassessed using additional species data extracted from a 2012 ABI Wildlife Consultancy report with permission from Edinburgh Napier University. The information was assessed by The Wildlife Information Centre and verified by experts. The assessment was then considered by the Local Biodiversity Site Steering Group, on which relevant specialist organisations are represented. The Council and the Group consider that the evidence does not justify the boundary change sought by the representations. No modification proposed. **(0193 Morningside Community Council; 2297 Friends of Craighouse; see Appendix A)**

Flooding

- No specific modifications requested. Concerns relating to flood protection are dealt with in Part 2 Section 3 of the Plan under Policy Env 21, which aims to ensure development does not result in increased flood risk for the site being developed or elsewhere. In practice, this is a highly restrictive policy. The Council has identified areas of importance for flood management on the Proposals Map. Paragraph 183 of Policy Env 21 emphasises the importance of maintaining strict control over development in these areas. No modification proposed. **(0799 NHS Lothian Public Health & Health Policy)**
- The Area of Importance for Flood Management have been identified through consultation with the Council's flooding officers and SEPA using national and local flood modelling data. No modification proposed. **(2119 Colinton Country Cattery)**
- This section of the Plan is intended to summarise the Plan's strategy on this matter. Detail on what the Plan supports or otherwise is provided in Part 2. Specific interventions to manage flood risk (such as afforestation) are a matter for plans prepared under the Flood Risk Management (Scotland) Act 2009. No modification proposed. **(2126 Cockburn Association)**

Green Network

- Site brief requirements for new open space relate to the landscape considerations identified through the housing site assessment and SEA. Additionally, they seek to

implement the Council's contribution to the national development of a Central Scotland Green Network. New development must also meet the standards of the Council's Open Space Strategy in terms of size, type, quality and accessibility distances. In this case, due to the location and scale of the proposed allocation at Maybury, two new large greenspaces of 2 ha would be required within the layout of development. Their precise location, form and design are a matter for masterplanning stage. The Council's Open Space strategy aims to provide a co-ordinated approach to meeting Edinburgh's open space needs, making good use of land by seeking to balance quantity and quality of greenspace, in order to avoid large area of poor quality yet expensive to maintain greenspace. It is considered that the Council's standards in the Open Space Strategy are realistic in these terms and viable. No modification proposed. **(2402 West Craigs Ltd)**

- No modifications proposed, however, the Council sees merit in adding in a reference to active travel paragraph 50. However, it is considered more appropriate for this to be added to bullet 3 to state 'extending and linking to the existing path and active travel network where opportunities arise.' **(2697 Scottish Natural Heritage)**

Greenspace Proposal - omission

- There is no current proposal for open space improvements at Mauseley Hill and Cammo Water Tower and no justification to require such a proposal in conjunction with housing proposal HSG 20. There is currently no deficiency in terms of the Council's Large Greenspace Standard as set out in the Open Space Strategy. The existing Cammo Estate Park is approximately 38 ha, exceeding the minimum 2 ha requirement and meets the quality element of the Standard. The open space does not meet the definition of open space in Planning Advice Note 65 as applied in the Open Space Audit (2009). The green belt designation continues to apply. Access may be taken in accordance with the Scottish Outdoor Access Code. No modification proposed. **(0225 Cramond & Barnton Community Council; 1351 Friends of Cammo)**

Greenspace Proposals - general

- Housing Proposal HSG 21 involves a loss of green belt. The centre of the Broomhills housing site is a raised knoll which must remain undeveloped to reduce impact on the landscape setting of the city. This is an opportunity to create a new community park which benefits from attractive views. It states in table 1 of the Plan that it should be landscaped and maintained to meet the Council's Large Greenspace Standard. In doing so, it will improve the quality and quantity of open space in this part of the city. Although one of the purposes of the green belt, as set out in Part 1 Section 2 paragraph 34 of the Plan is to protect and give access to open space within and around the city and neighbouring towns, agricultural land specifically does not meet the definition of open space in Planning Advice Note 65 Annex 1. No modification proposed. **(1124 Liberton Association)**
- The West Edinburgh Strategic Design Framework (2010) sets out the main areas of landscape and public realm to be provided at the IBG. The West Edinburgh Landscape Framework (2011) provides further illustrative advice on the proposed landscape treatments to be incorporated within the spatial structure defined by the West Edinburgh Strategic Design Framework in order to inform detailed site masterplanning. The boundary and extent shown on the Second Proposed Plan accurately reflects the Landscape Framework, and was amended from the first

Proposed Plan. No modification proposed. **(1159 New Ingliston Limited)**

- Greenspace Proposal GS 1 (Dalry Community Park) involves enhancing and extending the existing Dalry Community Park to meet existing deficiencies in provision and as part of public open space requirements associated with the redevelopment of Fountainbridge. It is proposed in more detail in the Fountainbridge Development Brief (2004). Due to the barrier of the Western Approach Road, it is not appropriate to expand it in the vicinity of the Union Canal. The West Edinburgh Landscape Framework (2011) provides further illustrative advice on the proposed landscape treatments to be incorporated within the spatial structure defined by the West Edinburgh Strategic Design Framework in order to inform detailed site masterplanning, including GS 6 (IBG Open Space). The final design of greenspace proposal GS9 would be subject to detailed masterplanning and assessed against LDP's design and environmental policies. No modification proposed. **(2126 Cockburn Association)**

Open Space Designation

- Muir Wood Field is covered by green belt designation and is in agricultural use. There is no justification to identify it as an open space proposal, and Planning Advice Note 65 Annex 1 does not include agricultural land within the definition of open space used for the open space audit and LDP. Residents of Juniper Green already benefit from access to open space at Bloomiehall Park, a Community Park of 2.2ha and 'good' quality, which therefore, meets the Council's quantitative and qualitative Open Space Strategy standards. Equally, residents of the Muir Wood Estate within Currie have access to Muir Wood Park, which at 1.8ha in extent, is just under the Council's 2ha standard but which forms a relatively large Community Park of 'very good' standard. Both Community Parks include play facilities; consequently there is no shortage of open space within the immediate location or requirement to provide an additional public open space. No modification proposed. **(0480 Currie East Neighbourhood Watch; 1342 Iain Proudfoot)**
- The site at Craigcrook Road is identified as 'Other Semi-Natural Greenspace' in the Council's Open Space Audit (2009) as it conforms to the description of this classification of open space as defined in Planning Advice Note 65. It is not identified as residential amenity greenspace. The Open Space Audit applies Planning Advice Note 65 typology to vegetated land within the main urban areas, and to some large features within the green belt (e.g. Corstorphine Hill) or recreational spaces adjoining or extending into the urban area (e.g. Cammo Estate Park, some golf courses and some green corridors). No modification proposed. **(1154 CALA Management Ltd)**
- As set out in the Open Space Audit 2009, the land is correctly identified as Residential Amenity greenspace and meets the definition of greenspace in Planning Advice Note 65. No modification proposed. **(2246 Mactaggart & Mickel Homes)**
- As set out in the Open Space Audit 2009, the land is correctly identified as Institutional greenspace and meets the definition of greenspace in Planning Advice Note 65. No modification proposed. **(2693 Spire Healthcare Ltd)**
- The open space designation which covers the Eyre Place gap site still meets the definition of greenspace in Planning Advice Note 65 and for that reason will not be removed. Planning applications involving its loss can be assessed in terms of Policy Env 18. No modification proposed. **(2572 Royal Bank of Scotland)**

Greenspace Proposal GS 4 and Edinburgh Bioquarter

- As illustrated in figure 5 in Part 1 Section 2 of the Plan, greenspace proposal GS 4 forms part of Edinburgh's contribution to the Central Scotland Green Network. For this reason, it is not appropriate to amend the boundary to remove the land in question from the greenspace proposal. Any consideration of a future planning application for alternative use of part of the site would be a separate matter, assessed on its merits at the relevant time. No modification proposed. **(1743 Thistle Timbers)**
- The character of greenspace proposal GS 4 is one of open parkland and therefore, is not considered to be urban in nature. For this reason, it is not appropriate to remove the word 'country' from 'country paths' as stated in Table 1. No modification proposed. **(2192 Edinburgh Bioquarter Partners)**
- The boundary is not inconsistent with the objectives of the Edinburgh BioQuarter Supplementary Guidance or Policy Env 15. The Proposals Map includes the Local Nature Conservation Site designation based on survey information about biodiversity value. This shows where Policy Env 15 applies to development applications. The Supplementary Guidance indicates where an exception to that policy would be justified under specific circumstances provided it is still necessary for the Proposals Map to identify where that constraint and policy exists. No modification proposed. **(2192 Edinbrugh Bioquarter Partners; 2683 Scottish Enterprise)**
- Landscape requirements are already set out in the Edinburgh BioQuarter and South East Wedge Parkland Supplementary Guidance under the creation of new public open space, retention of existing woodland, maximum building heights and treatment of the ridgeline defined as a 'sensitive area'. Provision of new tree planting would be assessed as part of any planning application. Additional 'extensive' tree planting, as requested by the representation, would be likely to affect the estimated site capacities set out in the Supplementary Guidance. No modification proposed. **(02126 Cockburn Association)**
- The greenspace proposal GS 4 is integral to Edinburgh's green network as identified on figure 5 of the Plan, and subsequently, the city's contribution to the Central Scotland Green Network. No modification proposed. **(2265 Springfield Properties plc)**
- The greenspace proposal GS 4 is integral to Edinburgh's green network as identified on figure 5 of the Plan, and subsequently, the city's contribution to the Central Scotland Green Network. No modification proposed. **(2408 HolderPlanning Ltd)**

Miscellaneous

- No modifications proposed, however, the Council sees merit in this representation to add reference to the Built Heritage Strategy in paragraph 22 of Part 1 Section 2 of the Plan, Reference is made to the Council's Natural Heritage Strategy in paragraph 37. **(2463 Euan Leitch)**

Glossary

- No modifications proposed, however, the Council sees merit in only part of this representation. The use of the term 'Countryside Recreation' and its definition is considered appropriate in the context of this Plan, as it may also involve very

limited buildings. No modification proposed. With regards to the definition of the Green Network, the Council sees merit in amending the text to refer to the Green Network as extending outwith the urban area into the wider countryside. For the purposes of clarity, the amended text could, for example, state 'The linking together of natural, semi-natural and man-made open spaces to create an interconnected network that extends outwith the urban area and provides recreational opportunities, improves accessibility and enhances biodiversity and the character of the landscape and townscape'. This will not change the Council's approach to auditing open space in line with Planning Advice Note 65 definitions. **(sportscotland 0124)**

Reporter's conclusions:

Background

1. The proposed plan in Part 1, Section 2 sets out details of the council's policies and proposals to protect and enhance the environment. One of the stated intentions is for the plan to meet the council's statutory duties, including to ensure that emissions are reduced and to adapt to climate change, as well as to promote sustainable development and travel. A full listing of the range and scope of the proposed plan's intentions relating to environmental matters is set out in its paragraph 18. As acknowledged in paragraph 19 of the proposed plan, Edinburgh's natural and historic environment contributes to its distinctive character, local appeal and international reputation. In this context I note that parts of the plan area are the subject to natural heritage and other designations aimed at conserving and effectively managing key assets in the historic and natural environment when promoting sustainable economic development in and around the city. Some details of these designations and associated environmental policies of the proposed plan have been questioned in representations and I have considered these in turn below under the sub-headings listed earlier in the Schedule 4.

Climate Change

2. Under this heading the sole representation expresses concerns about consistency in the plan between the detailed wording of two bullet points of the paragraph 18 text and that of Policy RS1 Sustainable Energy, in particular relating to renewable energy proposals. The representation suggests some amendments to address those concerns, with the aim of further safeguarding the natural and cultural heritage assets of the plan area.

3. I do not regard the case put forward in support of those suggested changes to be compelling. Indeed I find that the existing wording of the bullet points of paragraph 18 is already comprehensive in its coverage and provides sufficient protection, particularly when read in association with the relevant policies set out in Part 2 of the plan. In any event, as the council points out, any planning application, including for schemes related to energy generation and renewable energy, would be assessed in the context of the appropriate Design and Environment policies of the plan – as well as by reference to national policy principles and associated guidance. Accordingly, I conclude that there is no need or justification to amend the policy wording or supporting text of the plan in the manner being sought in the representation.

World Heritage Site

4. I note that during the finalisation of the new plan the Forth Bridge was being considered by UNESCO for formal designation as a World Heritage Site – and in that context one representation argues that any such designation should be reflected in the new plan.

5. In principle I agree with that approach, on the basis that in the proposed plan there are already references to the Old and New Towns of Edinburgh World Heritage Site – including for example in Part 1 Section 2, in policy Env 1 and on the Proposals Map. I note that in July 2015 the Forth Bridge was also confirmed by UNESCO as a World Heritage Site. In that context the council was invited, through a Further Information Request, to provide an updated position on how that might be most appropriately reflected in the new plan.

6. In response, the council acknowledged that this formal UNESCO designation should be recognised in the new plan and it put forward the following suggested changes to the draft plan to address this:

- Part 1 Section 2 – A Plan to Protect and Enhance the Environment (Page 10)
  - Amend the heading "The Old and New Towns of Edinburgh World Heritage Site" to "World Heritage Sites".
  - Amend paragraph 23 as follows:
    "Two of Edinburgh's most widely acclaimed assets are its World Heritage Site**s**. World Heritage Sites are places of outstanding universal value, recognised under the terms of the 1972 UNESCO Convention concerning the Protection of the World Cultural and Natural Heritage. The 'Old and New Towns of Edinburgh' became a World Heritage Site in 1995, and the 'Forth Bridge' became a World Heritage Site in 2015. The boundaries are shown in Figure 3 and Figure X and on the Proposals Map."
  - Amend paragraph 25 as follows:
    "Edinburgh's World Heritage Site Management Plan**s** have been prepared by a partnership of the Council, Historic Scotland and Edinburgh World Heritage. They provide~~s~~ a link between the international requirement of World Heritage, the planning process and the wider management issues involved in protecting ~~a~~ complex Site**s** like **in** Edinburgh. The Management Plan**s** inform separate Action Plan**s** and may be a material consideration for decisions on planning matters."
  - Include a new numbered figure (X) within the text in the same style as Figure 3 illustrating the extent of the Forth Bridge World Heritage Site in its entirety.

- Part 2 Section 3 - Caring for the Environment (Page 86)
  - Amend name of Policy Env 1 'Old and New Towns World Heritage Site' to 'World Heritage Sites'.
  - Amend Policy Env 1 to:
    "Development which would harm the qualities which justified the inscription of the Old and New Towns of Edinburgh and the Forth Bridge as World Heritage Site**s** or would have a detrimental impact on **a** Site's setting will not be permitted."
  - Amend first sentence of paragraph 158 to:
    "This policy requires development to respect and protect the outstanding

universal values of the World Heritage Site**s** and their setting**s**."

- Glossary
  - Add new sentence at end of entry for World Heritage Site: 'The Forth Bridge was inscribed in 2015.'

- Proposals Map

  - Amend the Proposals Map (North West sheet) to show the extent of the Forth Bridge World Heritage Site using the same symbol as per the Old and New Towns World Heritage Site. This is provided as Appendix A. Suggested Proposal Map Extract showing the Forth Bridge World Heritage
  - Site.

7. I am satisfied that the suggested changes now put forward by the council would address the representation in full - and accordingly I conclude that these various detailed changes should be incorporated when the plan is adopted.

Conservation Areas

8. One representation points out that the number of conservation areas in the plan area will vary over time and contends that it is therefore not appropriate to state a total number of conservation areas in the plan itself. I am persuaded by that argument – and note that its logic has been accepted by the council. Accordingly I conclude that it would be more appropriate for the opening sentence paragraph 28 of the plan to be modified to read as follows: " Across Edinburgh there are a number of designated Conservation Areas."

9. The representation also argues that the wording of the second sentence of paragraph 28 should be modified to better align with the wording of the primary planning legislation related to conservation areas. In this case I am not persuaded that there is a need for such a change to the plan as the existing wording does not conflict with the terms of the legislation and provides a reasonable indication of what is intended in conservation areas. Accordingly, I conclude that there is insufficient justification to further modify the text of paragraph 28 of the plan.

Inventory of Gardens and Designed Landscapes

10. The representation contends that an additional phrase should be attached to paragraph 29 of the draft plan – arguing that this would provide additional protection for historic landscape features within those parts of the plan area that are within the national Inventory of Gardens and Designed Landscapes. I am not persuaded that there is a need or justification to do so when the text concerned already clearly states that "the council will protect inventory sites" … and will "consider whether restoration or improvement of historic landscape features can be achieved through development proposals". Furthermore, I find that those principles are restated and reinforced by the inclusion of more detail in the wording of Policy Env 7 Historic Gardens and Designed Landscapes in Part 2 of the proposed plan. Based on all of these considerations I conclude that there is insufficient justification to modify the text of the proposed plan in the manner being advocated in the representation.

Seven Hills

11. A number of representations express concern about the failure of the proposed plan to include a particular paragraph that had featured in the previous local plan. This highlighted the quality of the Edinburgh environment, including its 7 hills and its urban heritage features, as well as regarding its accessibility to the nearby coast and surrounding countryside and to other hills. These representations seek reinstatement of that statement highlighting the distinctive character of the city's environment, including its seven hills.

12. In response to these particular concerns I am satisfied that the proposed plan, whilst concise in its overall style, already includes appropriate references to the natural and historic environment of the city. Indeed it states quite clearly – for example in paragraph 19, under the heading "Edinburgh's Environmental Assets – that these features contribute to its distinctive character, local appeal and world-wide reputation. Other sections of Section 2 of Part 1 of the proposed plan highlight the World Heritage Sites of the plan area and other key attractions of the city including its history, its green belt and other landscape characteristics, such as the green network – and recognise the importance of having regard to the conservation of these features when considering new development proposals. I note that these principles are reinforced by the policies set out in Part 2 of the proposed plan – in particular those set out in section 2 on Design Principles for new development and in the environmental policies of section 3 under the overall heading "Caring for the Environment."

13. I am persuaded by the argument put forward by the council that these policies and the plan as a whole place an emphasis on the diversities of the landscapes across the plan area – including recognising 22 Special Landscape Areas, which form the basis of policy Env 11. I note that this and the environment policies of the plan seek to safeguard these and other key landscape features, such as the green belt, along with particular urban heritage and nature conservation interests of the plan area – including those of international, national and local importance. I also note that some of the environmental policy principles of the new plan have been drawn up having had regard to guidance from other bodies such as Historic Environment Scotland and Scottish Natural Heritage – for example in respect of policy Env 11. Based on all of these considerations I conclude that there is no need or justification to make amendments to the proposed plan in response to the concerns expressed by these particular representations.

Trees and Woodland

14. The representation by Scottish Natural Heritage seeks a modification to paragraph 40 of the proposed plan in respect of delivery of the Edinburgh and Lothians Forestry and Woodlands Strategy. In particular it suggests adding at the end of that paragraph the following words "Opportunities will be taken to deliver the Strategy through greenspace proposals and management of the woodland resource throughout the city." I note that the council acknowledges the merit of this proposed amendment and I am of the same view, as this would help to highlight the contribution of the Forestry and Woodland Strategy to the overall planning of the area.

15. Based on the above considerations I conclude that Part 1 the plan should be amended by adding the following sentence to the end of paragraph 40 "Opportunities will be taken to deliver the Strategy through greenspace proposals and management of the woodland resource throughout the city."

16. Another representation also suggests modifications to paragraph 40 of the plan – including making more explicit reference to implementation and management and cross references to the above strategy as well as to site briefs, development principles and masterplans - on the basis that substantial tree and shrub planting is a key mitigation measure for a wide range of developments. I am satisfied that the modification I have already recommended – as detailed in paragraph 15 above – will provide the necessary and appropriate level of detail for paragraph 40 of the plan to broadly address most of the underlying concerns raised in this representation. Whilst the representation also seeks reference to be made here to carbon sequestration I am satisfied that this is a matter already dealt with elsewhere in the plan under the heading Climate Change. In summary, subject to the modification referred to earlier, I am in agreement with the council that the plan will contribute to achieving the objectives of the Forestry and Woodlands Strategy by ensuring that proposals are assessed against design and environmental policies as well as requiring new housing allocations to provide new woodland – with a view to achieving a suitable fit between development and the surrounding landscape as well as extending the green network. Accordingly, I am not persuaded that any further modifications to this paragraph are merited beyond the one highlighted above.

LNCS Designations

17. Under the sub-heading Biodiversity, paragraph 41 of Part 1 of the proposed plan includes reference to Local Nature Conservation Sites (LNCS). In Part 2 of the plan, section 3 outlines the plan's environmental policies under the heading of 'Caring for the Environment' – including policy Env 15 Sites of Local Importance. This policy, amongst other matters, sets out specific criteria concerning proposed developments likely to have an adverse impact on the flora, fauna, landscape or other relevant features of LNCS. The sites designated as LNCS are shown on the Proposals Map of the new plan – and these comprise Local Geodiversity Sites and Local Biodiversity Sites.

18. The unresolved representations do not question the overall policy principles relating to LNCS as set out in the proposed plan, but instead seek amendments to particular site-specific LNCS designations within the plan area. I have considered each of these in turn below.

Dovecot Park

19. The representation simply seeks inclusion of the part of Dovecot Park to the north of Dovecot Grove to be within the overall Dovecot Park LNCS – on the basis that this was a recommendation of the last local plan inquiry report for the area. The council acknowledges that the whole of Dovecot Park – including the part located to the north of Dovecot Grove – was shown in the adopted City of Edinburgh Local Plan as both open space and a LNCS, as recommended in the inquiry report at that time. I note, however, that the criteria for defining Local Biodiversity Sites has been the subject of new guidance. In summary it has been made more rigorous and on this basis existing LNCS boundaries have been reviewed, where appropriate, by a Steering Group. One important change is that playing fields are no longer included unless the area concerned has notable biological records to merit that area's retention as a Local Biodiversity Site. The council states that there are no such records in this particular case but the Dovecot Park playing fields remain as a Local Geodiversity Site and so it still appears as a LNCS on the Proposals Map.

20. Based on all of these considerations and the available evidence, I conclude that

there is insufficient reason to modify the plan in the manner being advocated in this particular representation regarding Dovecot Park.

Easter Bavelaw Farm

21. The representation seeks removal of the LNCS designation applying to this particular parcel of land. In the view of the objector, this designation together with the terms of policy Env 15 places additional restrictions on the use of the land concerned at Easter Bavelaw Farm for agricultural purposes. I note that this particular LNCS designation was reviewed by the council following a similar representation made in relation to the previous local plan's designation of this land as a LNCS. This led to the removal of an area of sloping ground from the designation but also resulted in the inclusion of the Hare Hill quarry site that was previously not within the LNCS. Whilst noting the detailed concerns expressed about the survey undertaken, I am not persuaded that this or the other terms of the representation - notably, a perception that this designation might potentially constrain farming options on the land concerned - provides sufficient justification for deletion of the LNCS designation. Policy Env 15 applies to the assessment of development proposals and most agricultural operations fall outwith that definition. Accordingly, I conclude that there should be no modification to this particular LNCS designation or to its boundaries, as shown on the plan's Proposals Map.

Craigcrook Road

22. This representation seeks removal of this particular LNCS designation on the basis that this would mean that policy Env 15 of the proposed plan would then no longer be applicable. The representation contends that the LNCS designation, linked with the protective terms of policy Env 15, places unacceptable constraints on the potential of the land concerned for residential development. I do not find this to be a compelling argument for deletion of this particular LNCS designation for the site concerned. In summary I find that insufficient justification has been put forward to merit removal of the LNCS designation. Instead I am satisfied that the land concerned still meets the criteria to remain as a LNCS – for the reasons articulated by the council. On this basis I also find that as a LNCS it merits the protection afforded by the terms of policy Env 15 against inappropriate developments. Based on all of these considerations I conclude that there is no need to modify the proposed plan. Finally, I note that the site in question is also the subject of a separate representation seeking its inclusion in the new plan as an additional housing allocation – which I have considered separately under Issue 17 of this report.

Burdiehouse

23. The representation seeks removal of this former garden site as a designated LNCS and for the land instead to be identified as a development opportunity – on the basis that the site is overgrown and has no particular ecological value or other features of significant interest. I note that the site of concern is part of a larger Local Biodiversity Site - known as the Niddrie Burn Complex – and it adjoins a Local Nature Reserve. In my view even if the site itself has only limited ecological value and is currently not well maintained that does not justify removal of its LNCS designation as shown in the plan. In my opinion that would detract significantly and unacceptably from the value of the LNCS as a whole in its local context. Accordingly, I conclude that there is insufficient justification to modify the plan in response to this particular representation.

Craighouse

24. There are a large number of representations expressing concerns about the reduced scale of the LNCS at Craighouse, as shown on the Proposals Map. The objectors seek reinstatement of the former, much larger boundaries of the LNCS that previously included the whole of the Craighouse estate.

25. I note that the council, in the light of earlier representations along these lines, undertook a detailed reassessment of this particular LNCS designation – and has provided details of this including with reference to advice from its partners as well as additional species data from independent consultants. I note that this assessment was then reviewed by the Local Biodiversity Steering Group, which included representatives from specialist organisations. I also note that the overall conclusions reached were that the boundary changes being sought by those now making representations could not be justified.

26. In summary, I am satisfied that a detailed reassessment of the LNCS boundaries was made and its technical findings were validated independently by appropriate specialists prior to the site being re-confirmed as a LNCS. Accordingly, I conclude that there are insufficient reasons to merit enlargement of the boundaries of the Craighouse LNCS from those now shown in the proposed plan.

Flooding

27. There is an overview on flood risk in paragraph 43 of Part 1 of the plan under the general sub-heading of Water and Air. The main policies of the plan are set out in Part 2. There, under the heading Protection of Natural Resources, policy Env 21 Flood Protection sets out specific requirements to be met with regard to flood risk when new developments are being considered. It makes clear that the purpose of this policy is to ensure "development does not result in increased flood risk for the site being developed or elsewhere". As noted in paragraph 183 of the plan, areas of importance for flood management are identified on the Proposals Map. It then states that in those areas strict control over development is regarded as essential and it provides further clarification regarding possible developments in these and other areas. It is in this context that I have considered the unresolved representations concerning flood risk. Some change to paragraph 183 is recommended in Issue 22 to respond to matters raised by the Scottish Environment Protection Agency(SEPA).

28. One of the representations, from the public health authority expresses general concerns about developments in high flood risk areas being adequately addressed in the new plan – notably to ensure that flood prevention measures are in place prior to construction. In my opinion, however, the existing strict terms of policy Env 21 and the accompanying text are sufficient to address these matters satisfactorily – having had regard, firstly, to the terms of the Scottish Planning Policy (SPP) on managing flood risk and drainage (in particular in paragraph 255) and, secondly, the role of SEPA. Where SEPA has raised specific issues with particular sites being allocated, the requirement for flood risk assessment has been included in the development principles related to those sites.

29. Another representation seeks removal of a particular site from those shown on the Proposals Map as being "Areas of Importance for Flood Management". I note that those particular areas highlighted on the Proposals Map have been defined on the basis of

close consultation between the council's own officers and the specialists of SEPA on these matters, having taken into consideration national and local flood modelling data. Based on the available evidence I am not persuaded that the site in question should be removed simply on the basis of the statement in the representation that the site concerned has "never flooded since records began" – as this does not necessarily mean that it is not at risk of flooding. As explained in paragraph 183 of the proposed plan, the mapping is included to highlight areas of risk rather than to presume against development where any proposal would be the subject to flood assessment.

30. The only other representation expresses concern that paragraph 43 does not state that development should not be permitted within important flood management areas and/or areas of medium/high risk of flooding - but is not specific about how it should be re-worded, beyond stating that there is no concern about the first sentence of that paragraph. In response, firstly I note that SEPA lodged no objection to this paragraph, which is simply an overview commentary. Secondly, and most importantly, the plan's detailed approach to flood protection is set out in policy Env 21 and the supporting text that follows. Based on these considerations and the lack of clarity on what the representation would prefer, I conclude that there is insufficient justification to amend paragraph 43 of the proposed plan. Meanwhile, as the council points out, specific interventions – such as afforestation - to manage flood risk are matters dealt with in plans prepared under the Flood Risk Management (Scotland) Act 2009.

Green Network

31. Part 1 of the proposed plan includes a section, starting at paragraph 48, which defines and sets out the role of the green network – as illustrated in figure 5. I note that Edinburgh's green network forms part of a wider green network for Central Scotland (CSGN). This is identified as a national development in the National Planning Framework 3 document – with its delivery involving a partnership of the constituent councils as well as other stakeholders.

32. In this context one of the representations is seeking an acknowledgement in the plan – in paragraph 52 – of the need to ensure a balance between achieving greenspace aspirations and related developments to be economically viable. Issue 21 recognises viability matters to be addressed through SG. In response I note, firstly, that Issue 21 of this report recognises that viability matters are addressed in detail through Supplementary Guidance. I also note that for new housing allocations the open space requirements specified in the proposed plan's site briefs are based on the findings of the housing site assessments together with a contribution towards meeting the council's obligations in respect of the CSGN. As the council points out, new developments are also required to meet the standards of its Open Space Strategy, which seeks to provide a co-ordinated approach to meeting the city's open space needs in a balanced and viable manner. On this basis I conclude that there is no need to amend the plan to address the concerns of this representation.

33. Another representation seeks an amendment to the proposed plan to reflect the fact that active travel is a contributor to the green network. I note that this has now been acknowledged by the council as a matter meriting inclusion. I am in agreement with the council that this could be best addressed by adding to bullet 3 of paragraph 50 of the proposed plan so that it reads "extending and linking to the existing path and active travel network where opportunities arise." Accordingly, I conclude that this would be an appropriate modification to the proposed plan.

Greenspace Proposal – Omission

34. One representation seeks to justify a new greenspace allocation to be made in the plan as an extension to the managed greenspace identified at the Cammo Estate. In my opinion the supporting arguments lodged in favour of this are outweighed by the merits of the case put forward by the council for not doing so. In summary, I note, firstly, that there are no current proposals or requirements for open space improvements at Mauseley Hill and Cammo Water Tower. Secondly, I note that the existing Cammo Estate Park equates to approximately 38ha, which far exceeds the standard minimum 2ha requirement. Furthermore, as the council points out, the land now in question does not meet the standard definition of open space as used in the Open Space Strategy of 2009 – which was based on the Planning Advice Note 65 guidance – and policy Env 20 refers to these matters. The development principles for the housing allocations being proposed for the Cammo area include the need for green network enhancements and new greenspace within the development. I conclude, therefore, that there is no justification to modify the plan in response to this particular representation. Accordingly, the land concerned in this representation will continue to form part of the green belt, as shown in the proposed plan.

Greenspace Proposals - general

35. The representations under this heading comprise site-specific concerns related to some of the 11 greenspace proposals listed in Table 1 on page 17 of Part 1 of the proposed plan. I deal with each of these in turn, in the order they have been listed.

GS 9

36. One representation raises two concerns – arguing, firstly, that the removal of this land from the green belt to form HSG 21 and a small part of it to become open space does not represent an improvement to the open space provision of the city and, secondly, that the site concerned does not form part of a network. In quantitative terms I can appreciate the first of the concerns raised. Another representation considers the GS 9 area to be too small. Notwithstanding these concerns, as the area identified here for open space is to be landscaped and maintained, I find that it will be improving this open space provision qualitatively for the benefit of the local community as well as contributing to the overall network of such spaces. Accordingly, I conclude that no modification to the proposed plan has been justified by this representation. This matter is also considered through Issue 8 in the context of the associated housing site for which I understand that the council now proposes to grant planning permission subject to a legal agreement.

GS 6

37. This representation simply seeks to amend the defined area of this proposal in the plan to reflect that shown in the West Edinburgh Landscape Framework (2011). The council, however, states that the boundary for GS 6 and its extent shown in the proposed plan matches exactly that shown in the West Edinburgh Landscape Framework. A master-planning process is ongoing for the International Business Gateway (IBG) as explained through Issue 20 in this report. Given the evolving nature of this proposal the associated diagram on page 55 is recommended for deletion but the open space designated on the proposals map under proposal GS 6 is retained. I conclude, therefore, that no change to the proposals map is required.

GS 1

38. The representation seeks expansion of this particular proposal in the vicinity of the Union Canal – but this is regarded by the council as inappropriate because of the barrier provided by the Western Relief Road. I note that the intention is to enhance and expand the existing Dalry Community Park to address current deficiencies in open space provision and that this is being progressed through the Fountainbridge Development Brief. Furthermore the detailed masterplanning of these initiatives is being informed by the West Edinburgh Landscape Framework. Based on all of these considerations I conclude that there is insufficient justification to amend the GS 1 proposal.

Open Space Designation

39. The representations lodged under this sub-heading mostly seek removal of specific sites from their open space designation on the Proposals Map of the plan – but in the first case below the representations seek inclusion of a new area as "open space".

40. The representations would support designation of Muir Wood Field as open space on the basis that it provides "an essential buffer" between Juniper Green and Currie and there is local interest in providing allotments and exercise/recreation areas here. Whilst noting these aspirations, I find that the land concerned is currently in agricultural use that does form part of the standard definition of open space used by the council. I also note that the site is in the defined green belt and so protected from inappropriate developments. Finally, as the council points out, the area concerned is not short of open space provision so there is no immediate requirement to meet an existing deficit. Based on all of these considerations I conclude that there is insufficient justification to designate the site as open space in the plan.

41. In the other cases cited the representations are seeking removal of the open space designation on the Proposals Map in respect of the following sites: Craigcrook Road; Hillpark Road/Craigcrook Road; lawn at Murrayfield Hospital; and Eyre Place gap site – some of which are also considered as development proposals elsewhere in this report – under Issue 17. In each of these cases I am persuaded that the available evidence cited by the council demonstrates that these sites all conform to the definition to be categorised as open space in the plan – having regard to the definitions recommended in Scottish Government guidance on these matters. More generally, Policy Env 18 provides a framework for the assessment of individual proposals involving the loss of open space. Accordingly, it is more appropriate for these sites to be considered in detail through the development management process - at which stage a justification in accordance with this policy would need to be satisfactorily provided. Accordingly, I conclude that there is insufficient justification to remove the open space designation from any of these sites.

Greenspace Proposal GS 4 and Edinburgh Bioquarter

42. An objection to proposal GS 4 seeks an amendment to its boundary to exclude a piece of ground adjacent to Thistle Timbers. As noted earlier, I am aware that Edinburgh's green network forms part of a wider green network for Central Scotland (CSGN) and this is identified as a national development in the National Planning Framework 3 document. In this context I am satisfied that the GS 4 proposal forms part of Edinburgh's contribution as a commitment to the CSGN. Accordingly, I am not persuaded that it would be appropriate to amend the boundary of GS 4 as shown in the proposed plan to exclude the Thistle Timbers land. As the council points out, any

planning application proposing an alternative use of part of this land would be assessed on its merits through the Development Management process by the planning authority.

43. With regard to the arguments being put forward in respect of the Wisp (North) area and the site at Edmonstone, I note that in both cases the open spaces there would be lost with the housing allocations being made there – as detailed under Issue 14. I also note that the area referred to as Wisp (South) is retained. The argument put forward - that this site is not of an appropriate quality - is not sufficient reason in my view to outweigh its potential role as part of Edinburgh's green network, as illustrated on Figure 5 of the plan, and therefore to make a contribution towards the city's strategic commitment to the CSGN.

44. Another representation contends that the supporting text accompanying proposal GS 4 should be amended to convey a more urban parkland approach and so exclude the word "country" from the term country paths. I do not find this argument persuasive and conclude that the wording should remain unaltered, on the basis that the GS 4 greenspace is characterised by its open parkland and in my view it is not urban in character.

45. One representation questions the detailed boundary of the GS 4 proposal – arguing that it should reflect the Edinburgh BioQuarter Supplementary Guidance. The council in response states that the GS 4 boundary is "not inconsistent" with the objectives of that Guidance or indeed policy Env 15 - Sites of Local Importance of the proposal plan. I am persuaded by that argument based on the detailed clarification that has been provided to support it – for example with regard to how Local Nature Conservation Boundaries were defined taking account of survey information on biodiversity value. Accordingly, I conclude that there is insufficient justification to amend the plan in response to this particular representation.

46. Another representation argues in favour of an additional principle to be added to the Edinburgh BioQuarter Principles listed on page 68 in Part 1 of the proposed plan – essentially supporting new tree planting to complement new developments there. In my opinion the aspiration of this representation has already been met by the existing provisions of the plan together with the detailed requirements set out in the South East Wedge Parkland Supplementary Guidance, as part of a balanced approach to secure appropriate landscaping whilst also ensuring that estimated site capacities are still achievable. Accordingly, I conclude that there is insufficient justification to amend the plan in response to this particular representation.

Miscellaneous

47. I note that this particular representation - seeking a brief reference to the Built Heritage Strategy to be inserted in paragraph 22 of Part 1 of the plan - has now been agreed by the council. I conclude that the proposed modification would be appropriate, as this cross-referencing would improve the consistency of the plan.

Glossary

48. One representation argues in favour of two amendments to the plan's glossary – related to 'countryside recreation' and the 'green network' respectively. I agree with the council, firstly, that the use of the term countryside recreation in the plan and its definition in the plan glossary are widely understood and do not require any amendment. I am

persuaded, however, that there is merit in changing the glossary definition of the green network in the plan and conclude that the revised wording now being advocated by the council would be more appropriate. I conclude therefore that this change to the proposed plan should be made to aid clarity.

Reporter's recommendations:

Modify the proposed plan as follows:

1. Part 1 Section 2 – A Plan to Protect and Enhance the Environment (Page 10)

   - Amend the heading "The Old and New Towns of Edinburgh World Heritage Site" to "World Heritage Sites".
   - Amend paragraph 23 as follows:
     Two of Edinburgh's most widely acclaimed assets ~~is~~ **are** its World Heritage Site**s**. World Heritage Sites are places of outstanding universal value, recognised under the terms of the 1972 UNESCO Convention concerning the Protection of the World Cultural and Natural Heritage. The 'Old and New Towns of Edinburgh' became a World Heritage Site in 1995, and the 'Forth Bridge' became a World Heritage Site in 2015. The boundaries are shown in Figure 3 and Figure X.
   - Edinburgh's World Heritage Site Management Plan**s** have been prepared by a partnership of the Council, Historic Scotland and Edinburgh World Heritage. They provide a link between the international requirement of World Heritage, the planning process and the wider management issues involved in protecting complex site**s** in Edinburgh. The Management Plan**s** inform separate Action Plan**s** and may be a material consideration for decisions on planning matters
   - Include a new numbered figure (X) within the text in the same style as Figure 3 illustrating the extent of the Forth Bridge World Heritage Site in its entirety.

2. Part 2 Section 3 – Caring for the Environment (Page 86)

   - Amend name of Policy Env 1 'Old and New Towns World Heritage Site' to read: World Heritage Sites.
   - Amend Policy Env 1 to read:
     Development which would harm the qualities which justified the inscription of the Old and New Towns of Edinburgh and the Forth Bridge as World Heritage Site**s** or would have a detrimental impact on a Site's setting will not be permitted
   - Amend first sentence of paragraph 158 to read:
     This policy requires development to respect and protect the outstanding universal values of the World Heritage Site**s** and their settings

3. Glossary

   - Add new sentence at end of entry for World Heritage Site:
     'The Forth Bridge was inscribed in 2015**.**'

4. Proposals Map

   - Amend the Proposals Map (North West sheet) to show the extent of the Forth Bridge World Heritage Site using the same symbol as per the Old and New Towns World Heritage Site. This is provided as Appendix A. Suggested Proposal Map

Extract showing the Forth Bridge World Heritage Site [as supplied by the council in its response to the Further Information Request].

5. Modify the opening sentence of paragraph 28 of Part 1 of the plan to read as follows:
Across Edinburgh there are a number of designated Conservation Areas.

6. Modify paragraph 40 of Part 1 of the plan by adding the following sentence to the end of it:

Opportunities will be taken to deliver the Strategy through greenspace proposals and management of the woodland resource throughout the city.

7. Modify bullet 3 of paragraph 50 of Part 1 of the proposed plan to read:

- extending and linking to the existing path and active travel network where opportunities arise.

8. Modify paragraph 22 of Part 1, Section 2 of the plan by adding the following sentence at the end of it:

The Edinburgh Built Heritage Strategy aims to ensure an understanding of Edinburgh's heritage assets in order that they can be protected and conserved for existing and future generations, and managed in a co-ordinated and structured manner.'

9. Modify the Glossary of the plan by changing the definition of Green Network there to now read as follows:

The linking together of natural, semi-natural and man-made open spaces to create an interconnected network that extends outwith the urban area and provides recreational opportunities, improves accessibility and enhances biodiversity and the character of the landscape and townscape.

Issue 3 Appendix A – Seven Hills

0580	C.D Kerr
0626	C McConnachie
0657	Louise Miller
0660	Hector Chawla
0662	Simon Chawla
0784	Duncan Wallace
0788	Martin O'Gorman
0794	Fiona O'Gorman
1089	Heather Hewitt
1103	Alan Craythorne
1324	Christine Rigouleau
1344	Helen Mitchell
1493	Gordon Ford
1494	Kathy Tunnah
1502	John R Baldwin
1560	Sheila Millar
1574	Alison Dalrymple
1642	Ann Duncan
1652	Margaret Holligan
1691	Mohini Padayachee
1736	Alison Waugh
1740	Honor Loudon
1742	Lindy Furby
1778	Valerie Forbes
1967	Rhona McGrath
1969	Sally Ann Urry
1970	Robin Urry
2010	Mark Kassyk
2047	Ian Brown
2166	Linda Bendle
2169	Graeme King
2316	Martyn Wells
2419	Rosy Barnes
2426	Pol Yates
2445	Anna Raper
2467	Elizabeth Hall
2532	Joe Frankel
2558	Juliet Wilson
2561	Graham Johnston
2564	Ruth Wilkojc
2566	Peter Nienow
2580	Fiona Hartree
2621	Maureen Loebel
2631	Marek Wilkojc
2633	Sandra Morris
2634	David Morris
2661	Anni McLeod

Issue 3 Appendix B - Craighouse

0342	Nic Honhold
0580	C.D Kerr
0626	C McConnachie
0657	Louise Miller
0660	Hector Chawla
0662	Simon Chawla
0784	Duncan Wallace
0788	Martin O'Gorman
0794	Fiona O'Gorman
1089	Heather Hewitt
1103	Alan Craythorne
1324	Christine Rigouleau
1344	Helen Mitchell
1493	Gordon Ford
1494	Kathy Tunnah
1500	Dougie Hamilton
1502	John R Baldwin
1560	Sheila Millar
1574	Alison Dalrymple
1642	Ann Duncan
1652	Margaret Holligan
1691	Mohini Padayachee
1736	Alison Waugh
1742	Lindy Furby
1967	Rhona McGrath
1969	Sally Ann Urry
1970	Robin Urry
2010	Mark Kassyk
2047	Ian Brown
2166	Linda Bendle
2169	Graeme King
2283	Dianne Haley
2284	Martin Haley
2316	Martyn Wells
2419	Rosy Barnes
2426	Pol Yates
2445	Anna Raper
2458	Beth Bader
2467	Elizabeth Hall
2532	Joe Frankel
2534	Pam Barnes
2554	Joanna Blythman
2558	Juliet Wilson
2561	Graham Johnston
2564	Ruth Wilkojc
2566	Peter Nienow
2580	Fiona Hartree
2621	Maureen Loebel
2629	Margaret Clark
2631	Marek Wilkojc
2633	Sandra Morris
2634	David Morris
2661	Anni McLeod

Issue 4	**Economic Development and Shopping/Leisure Proposals**	
Development plan reference:	**Part 1 Section 3 pages 18 – 20** **Table 2 Special Economic Areas** **Part 1 Section 3 pages 28 – 33** **Table 6 Network of Shopping Centres Figure 8 Shopping Centres** **Table 7 Commercial Centres** **Table 8 Shopping Proposals** **Appendix B – Shopping Proposals**	**Reporter:** Lance Guilford

Body or person(s) submitting a representation raising the issue (including reference number):

0088 Malcolm Cubb	2088 Scottish Government
0190 Ediston Properties Ltd & West Register	2093 Aldi Stores Ltd
0388 Pauline Cowan	2126 Cockburn Association
0698 David Wilson Homes and J & J Muir	2192 Edinburgh BioQuarter Partners
0838 Gibraltar General Partner Ltd	2268 TIAA Henderson Real Estates
1048 Swanston Farms Ltd	2271 Vita Edinburgh 1 Limited
1124 Liberton Association	2324 Fairmilehead Community Council
1146 Amber Real Estate	2346 Ocean Terminal Ltd
1159 New Ingliston Limited	2354 Grange/Prestonfield Community Council
1726 Marchmont & Sciennes Community Council	2536 Parc Craigmillar Ltd
1964 The Grange Association	2572 Royal Bank of Scotland
2085 A & D Brewster	2699 Scottish Environment Protection Agency
2086 Persimmon Homes (East Scotland)	

Provision of the development plan to which the issue relates:	These sections of the plan set out the designations and proposals relating to economic development and shopping.

Planning authority's summary of the representation(s):

CONTEXT

The Main Issues Report consulted on the approach to locating strategic office developments. The SDP requires LDPs to retain the quantity of established strategic employment land across the SDP area.

ECONOMIC DEVELOPMENT

<u>General</u>

- Delete economic proposals carried forward from older plans and replace with new land with major transport linkages such as the tram, for example at Ratho. This will fully exploit the tram link in terms of supporting residential development in sustainable locations and promoting economic growth. **(0698 David Wilson Homes and J & J Muir)**

- Amend text in Table 2 to remove reference to the withdrawn West Edinburgh Planning Framework. Amend title of the International Business Gateway designation to reflect changes sought under Issue 20. **(1159 New Ingliston Limited)**
- National Planning Framework 3 was published and in force on 23 June 2014 replacing National Planning Framework 2, and now sets out the strategic approach for West Edinburgh, replacing the West Edinburgh Planning Framework. **(2088 Scottish Government)**
- Amend the Plan's text to remove references to the challenging economic circumstances in the present tense. In order to reflect recent past economic downturn and more positive overall economic development prospects for the city's growth, particularly in the International Business Gateway context. **(1159 New Ingliston Limited)**
- Review economic supply and provide evidence of takeup rates to determine if there is sufficient, under or over supply of economic land. To ensure economic allocations are realistic in terms of past uptake. Having an over ambitious supply will likely bring forward successful change of use appeals. **(2086 Persimmon Homes (East Scotland))**
- Amend text in paragraph 56 to make clear the Council's support for higher education institutions, and that accommodating and serving the growing student population is a key aim of the Council. **(2271 Vita Edinburgh 1 Limited)**
- Amend the text in paragraph 59 to ensure compliance with Flood Risk Management (Scotland) Act. The Special Economic Areas outlined in Table 2 are all located adjacent to the functional flood plain or in an area of known flood risk. As such, parts of these sites may not be suitable for development, and further assessment may be required. In order that developers are informed and take flood risk into consideration and that a sustainable approach to managing flood risk in accordance with the Council's duties under the Flood Risk Management Act. **(2699 Scottish Environment Protection Agency)**

<u>Edinburgh's Special Economic Areas - BioQuarter</u>

- Amend text in the Development Principles for the BioQuarter with an additional bullet point - 'Contribution towards junction improvements at A720, Sheriffhall Junction' and update the Action Programme accordingly. The potential scale of development at the Edinburgh BioQuarter and its proximity to the A720 and Sheriffhall Junction, will impact on the road network at this location. The full potential impact has not been fully considered within the transport appraisal. **(2088 Scottish Government)**
- Amend text in Table 2 Edinburgh BioQuarter to remove reference to an international developer specialising in the life sciences sector as they no longer form part of the Edinburgh BioQuarter Partners. **(2192 Edinburgh BioQuarter Partners)**

<u>Edinburgh's Special Economic Areas – Edinburgh Airport and the Royal Highland Centre</u>

- The site known as Fairview Mill comprises mill, silos, storage, office and industrial buildings. It is designated within the Royal Highland Centre (RHC) designation Policy Emp 5 which supports the development and enhancement of the Royal Highland Centre. However, the Fairview Mill is not within the approved masterplan for the Royal Highland Centre, and is clearly not required to fulfil the ambitions of

the Royal Highland and Agricultural Society of Scotland. Therefore, there is a contradiction in satisfying the requirements of Policy Emp 5, which requires that the sites accord with the Royal Highland Centre masterplan. The site does not fall within the area identified in the West Edinburgh Strategic Design Framework (2010). The site is within the area identified as West Edinburgh Strategic Development Area in the SDP as an internationally recognised are of economic importance. **(1146 Amber Real Estate)**

Edinburgh's Special Economic Areas – International Business Gateway

- Amend text of paragraph 59 Edinburgh's Special Economic Areas to make more emphasis of West Edinburgh and International Business Gateway as a key location to attract international markets and mixed business-led uses. **(1159 New Ingliston Limited)**
- Amend text in Table 2 to remove reference to the withdrawn West Edinburgh Planning Framework. Amend title to reflect changes sought under Issue 20. **(1159 New Ingliston Limited)**.
- Amend text on page 20, Table 2 for International Business Gateway to remove reference to West Edinburgh Planning Framework. Include text which states 'National Planning Framework 3 identifies West Edinburgh, including the International Business Gateway as being a significant location for investment'. **(2088 Scottish Government)**
- Does not consider that the International Business Gateway Development Principles address the likely uncertainties of this development, nor the appropriate visual impact of a rigid, central urban grid layout in this peripheral city location adjoining areas of countryside. **(2126 Cockburn Association)**

Edinburgh's Special Economic Areas – RBS Headquarters, Gogarburn

- Amend text in Policy Emp 7 RBS Headquarters Gogarburn to delete 'are acceptable in terms of impact on green belt objectives'. Amend text in Table 2 to remove the reference to headquarters and single user office development in the RBS Headquarters, Gogarburn and replace with 'office development' in order to comply with terms of the S.75 for the site, where the single user clause is in place until 2015 only. **(2572 Royal Bank of Scotland)**

Edinburgh's Special Economic Areas – Leith Docks

- Not aware that the change to renewable energy industry on this site has been fully tested, it would be prudent to monitor its continued relevance to ensure that no chance for housing development is overlooked. **(2126 Cockburn Association)**

SHOPPING AND LEISURE PROPOSALS

General

- Concern raised regarding the over-generalisation that there is limited demand for new retail floorspace and absence of any gaps in the overall amount of retail provision in Edinburgh, while ignoring qualitative deficiencies in provision. Own findings and business turnover disagree with this conclusion. Suggests that the methodology used by the Council and the subsequent conclusions are not robust

or consistent with best practice recommendations on 'Techniques for Development Planning' set out within the Town Centres and Retailing Methodologies Report (2007). **(2093 Aldi Stores Ltd)**

City Centre

- Amend the text in paragraphs 76 and 77 and Table 7: Replace reference to St James Quarter with "Edinburgh St James" to reflect current branding; add reference in paragraph 77 to the city centre to stress importance of the entire retail hierarchy. **(2268 TIAA Henderson Real Estates)**

Local Centres

- Amend Table 6 and the Proposals Map by extending the boundary of the existing Chesser Avenue Local Centre to include the 'commercial' part of the Fruitmarket site and re-designate this as a new Commercial Centre. The LDP should reflect more accurately the planning permission for retail development that has been granted at the Fruitmarket and the significant change this will make to the area and the local centre. **(0190 Ediston Properties Ltd & West Register).**
- Amend Table 8 to remove Shopping Proposal S5 Brunstane from the plan. There should be no requirement for this new local centre and the site should be retained in the green belt. **(0388 Pauline Cowan)**
- Supports Shopping Proposal S5 Brunstane as keen to see retail outlets to allow a pharmacy to be built in the area. **(0088 Malcom Cubb)**
- Amend the definition of local centres (paragraph 73 and in the Glossary) or sub-divide them in order to give some indication as to the size of the centre (e.g. large, medium, small). Suggests the definition is misleading and that the definitions are intended to simplify the classification rather than indicate the nature of the facility. **(1124 Liberton Association)**
- Amend Table 8 Shopping Proposals to include new proposed local centre(s), S6, within larger phased mixed use at the International Business Gateway. **(1159 New Ingliston Limited)**
- Amend the addresses in the Marchmont South Local Centre in Appendix B. Properties included should be 126-146 Marchmont Rd rather than 126-148. **(1726 Marchmont & Sciennes Community Council)**
- Amend Table 6 to designate the group of shops at Mayfield Road near West Saville Terrace and in Blackford Avenue as local centres. It would be a perverse outcome if the support for defined local centres resulted in adverse commercial and trading pressure on other existing important local shopping areas not designated as local centres. **(2354 Grange/Prestonfield Community Council)**
- Support the preservation of local centres which provide a vital service for the elderly and infirm. Welcome the inclusion of Ratcliffe Terrace and Marchmont North and South. **(1964 The Grange Association)**
- Amend Table 6 and the proposals map to include Buckstone Terrace as a local centre. **(2324 Fairmilehead Community Council)**
- Amend the boundary of Oxgangs Local Centre in the Proposals Map to include the St John's Church site. **(2093 Aldi Stores Ltd)**
- Amend Table 6 and Table 8 and the Proposals Map with the redesignation of Craigmillar shopping centre from a local centre to a town centre and amends its boundary to include additional land, reflecting the Craigmillar Urban Design Framework (August 2013). **(2536 Parc Craigmillar Ltd)**

Commercial Centres

- Amend Table 6 and the proposals map to extend the boundary of the Leith Town Centre to include North Junction Street and Ocean Drive or create a specific policy for Ocean Terminal to provide it with enhanced status as a commercial centre, equivalent to a town centre. There are key differences in the roles of Edinburgh's eight commercial centres and one policy which prohibits expansion is not possible to be suitable for all their needs. Disagrees with the approach to restrict any increase in floorspace at Ocean Terminal by linking it to residential development at the Waterfront. The proposed business and large-scale industrial development (Special Economic Area at Leith Docks) will also increase demand for retail, restaurant and leisure facilities. **(2346 Ocean Terminal Ltd)**
- Amend the text in Table 7, the role of Newcraighall/The Jewel (Fort Kinnaird), by adding: 'No further growth beyond existing approvals, to guard against further expansion. Space for bulky goods retailers in larger units needs to be retained.' Amend the text to restrict the total floorspace at Fort Kinnaird to 71,502 in order to restrict the total growth, including leisure and restaurant uses, and control the character and function of the retail park. **(2346 Ocean Terminal Ltd)**
- Amend the text in Table 7 by deleting the description in ‘Existing Role and Characteristics’ and ‘Current Commitments and Future Role’ for Newcraighall/The Jewel and replacing it with alternative text: 'One of the largest out-of-centre shopping areas in the UK. Contains a superstore, and a wide variety of non-food retail units, ranging in size from a DIY superstore to small shop units. Planning permission was recently approved for a multiplex cinema, which will replace a previous cinema which existed within Fort Kinnaird for almost 20 years. Although currently located on the edge of the urban area, this situation will change with the future development of housing areas at the South East Wedge and at Newcraighall. It provides shopping facilities for the southeast of the city and beyond. Well-served by buses. Also adjacent to Newcraighall railway station which will be served by the new Border rail link from 2015.' For text under 'Current Commitments and Future Role' replace with: 'Planning permission granted in 2011 to reconfigure the centre. Retail floorspace is capped at 71, 502 sq m. There is a commitment to limit retail unit sizes'. These changes will more accurately reflect historic leisure uses and transport access. The reference to the limited walk-in catchment remains misleading. **(0838 Gibraltar General Partner Ltd)**
- Add text in Table 7 Newcraighall/The Jewel: 'No further growth beyond existing approvals and to limit retail unit sizes' to improve investor confidence given the potential risks that further growth and enhancements to the attractiveness of this commercial centre would have on the city centre. **(2268 TIAA Henderson Real Estates)**

Leisure Proposals

- Amend the plan in Part 1 Section 5 under "Elsewhere Across the LDP Area" to designate land at Swanston as an Adventure Centre. Proposes Swanston Adventure Centre as a new landmark destination and tourist attraction at a key gateway location that would enhance the green belt, promote development opportunities, protect the environment and provide regeneration opportunities to the site. **(1048 Swanston Farms Ltd)**
- Amend the plan to allocate Craigpark Quarry as a Country and Adventure Park. Remove the site from the countryside, and reinstate the Policy M6 of the Rural West Edinburgh Local Plan which designated this site as a Country Park where

'countryside and water-related recreational uses are preferred.' **(2085 A & D Brewster)**

Modifications sought by those submitting representations:

ECONOMIC DEVELOPMENT PROPOSALS

General

- Delete economic proposals carried forward from older plans and replace with new land with major transport linkages such as the tram, for example at Ratho. **(0698 David Wilson Homes and J & J Muir)**
- Amend text in Table 2 to remove reference to the withdrawn West Edinburgh Planning Framework. Amend title of the International Business Gateway designation to reflect changes sought under Issue 20. **(1159 New Ingliston Limited)**
- Amend text in paragraph 58 to remove reference to National Planning Framework 2. **(2088 Scottish Government)**
- Amend the plan's text to remove references to the challenging economic circumstances in the present tense. **(1159 New Ingliston Limited)**
- Review economic supply and provide evidence of takeup rates to determine if there is sufficient, under or over supply of economic land. **(2086 Persimmon Homes (East Scotland))**
- Amend text in paragraph 56 to make clear the Council's support for higher education institutions, and that accommodating and serving the growing student population is a key aim of the Council. **(2271 Vita Edinburgh 1 Limited)**
- Amend the text in paragraph 59 to include: 'While many of these areas have had master plans approved by the Council, planning applications coming forward may need to be updated to reflect current responsibilities under the Flood Risk Management (Scotland) Act. Individual applications in these areas may therefore have to be supported by flood risk assessments including consideration of pluvial flood risk.' **(2699 Scottish Environment Protection Agency)**

Edinburgh's Special Economic Areas - BioQuarter

- Amend text in the Development Principles for the BioQuarter with an additional bullet point - 'Contribution towards junction improvements at A720, Sheriffhall Junction' and update the Action Programme accordingly. **(2088 Scottish Government)**
- Amend text in Table 2 Edinburgh BioQuarter to remove reference to an international developer specialising in the life sciences sector. **(2192 Edinburgh BioQuarter Partners)**

Edinburgh's Special Economic Areas - Edinburgh Airport and Royal Highland Centre

- Amend the boundary as shown in the Proposals Map to remove Fairview Mill from the Royal Highland Centre Policy Emp 5, the boundary of which should follow the Royal Highland Centre boundary. The Fairview Mill site should be subject to no specific policy designation, similar to land at Turnhouse Road. **(1146 Amber Real Estate)**

Edinburgh's Special Economic Areas - International Business Gateway

- Amend text of paragraph 59 Edinburgh's Special Economic Areas to make more emphasis of West Edinburgh and International Business Gateway as a key location to attract international markets and mixed business-led uses. **(1159 New Ingliston Limited)**
- Amend text in Table 2 to remove reference to the withdrawn West Edinburgh Planning Framework. Amend title to reflect changes sought under Issue 20. **(1159 New Ingliston Limited)**.
- Amend text on page 20, Table 2 for International Business Gateway to remove reference to West Edinburgh Planning Framework. Include text which states 'National Planning Framework 3 identifies West Edinburgh, including the International Business Gateway as being a significant location for investment'. **(2088 Scottish Government)**
- No specific modification requested other than to comment on the uncertainties and appropriateness of the urban form at the International Business Gateway. Comments noted. **(2126 Cockburn Association)**

Edinburgh's Special Economic Areas - RBS Headquarters, Gogarburn

- Amend text in Policy Emp 7 RBS Headquarters Gogarburn to delete 'are acceptable in terms of impact on green belt objectives'. Amend text in Table 2 to remove the reference to single user office development in the RBS Headquarters, Gogarburn and replace with 'office development' in order to comply with terms of the legal agreement for the site, where the single user clause is in place until 2015 only. **(2572 Royal Bank of Scotland)**

Edinburgh's Special Economic Areas - Leith Docks

- Amend text in Table 2, Leith Docks: add after 'industry' 'will be monitored to ensure its continued relevance'. **(2126 Cockburn Association)**

SHOPPING AND LEISURE PROPOSALS

General

- Amend text in, or delete, paragraph 77 to make reference to the relevance of qualitative deficiencies across the city. **(2093 Aldi Stores Ltd)**

City Centre

- Amend the text in paragraphs 76 and 77 and Table 7: Replace reference to St James Quarter with "Edinburgh St James" to reflect current branding; add reference in paragraph 77 to the city centre to stress importance of the entire retail hierarchy. **(2268 TIAA Henderson Real Estates)**

Local Centres

- Amend Table 6 and the Proposals Map by extending the boundary of the existing Chesser Avenue Local Centre to include the 'commercial' part of the Fruitmarket site and re-designate this as a new Commercial Centre. **(0190 Ediston Properties**

Ltd & West Register)

- Amend Table 8 to remove Shopping Proposal S5 Brunstane from the plan. **(0388 Pauline Cowan)**
- Amend the definition of local centres (paragraph 73 and in the Glossary) or sub-divide them, in order to give some indication as to the size of the centre (e.g. large, medium, small). **(1124 Liberton Association)**
- Amend Table 8 Shopping Proposals to include new proposed local centre(s), S6, within larger phased mixed use at the International Business Gateway. **(1159 New Ingliston Limited)**
- Amend the addresses in the Marchmont South Local Centre in Appendix B. Properties included should be 126-146 Marchmont Rd rather than 126-148. **(1726 Marchmont & Sciennes Community Council)**
- Amend Table 6 to designate the group of shops at Mayfield Road near West Saville Terrace and in Blackford Avenue as local centres. **(2354 Grange/Prestonfield Community Council)**
- Amend Table 6 and the Proposals Map to include Buckstone Terrace as a local centre. Due to the variety and number of shops and being the only shops in the local area, they should be designated as a local centre. **(2324 Fairmilehead Community Council)**
- Amend the boundary of Oxgangs Local Centre in the Proposals Map to include the St John's Church site. To allow the site to be redeveloped for shopping use. **(2093 Aldi Stores Ltd)**
- Amend Table 6 and Table 8 and the Proposals Map with the redesignation of Craigmillar shopping centre from a local centre to a town centre and amends its boundary to include additional land, reflecting the Craigmillar Urban Design Framework (August 2013). **(2536 Parc Craigmillar Ltd)**

<u>Commercial Centres</u>

- Amend Table 6 and the proposals map to extend the boundary of the Leith Town Centre to include North Junction Street and Ocean Drive or create a specific policy for Ocean Terminal to provide it with enhanced status as a commercial centre, equivalent to a town centre. **(2346 Ocean Terminal Ltd)**
- Amend the text in Table 7, the role of Newcraighall/The Jewel (Fort Kinnaird), by adding: 'No further growth beyond existing approvals, to guard against further expansion. Space for bulky goods retailers in larger units needs to be retained.' Amend the text to restrict the total floorspace at Fort Kinnaird to 71,502. **(2346 Ocean Terminal Ltd)**
- Amend the text in Table 7 by deleting the description in ‘Existing Role and Characteristics’ and ‘Current Commitments and Future Role’ for Newcraighall/The Jewel and replacing it with alternative text. **(0838 Gibraltar General Partner Ltd)**
- Add text in Table 7 Newcraighall/The Jewel: 'No further growth beyond existing approvals and to limit retail unit sizes' to improve investor confidence given the potential risks that further growth and enhancements to the attractiveness of this commercial centre would have on the city centre. **(2268 TIAA Henderson Real Estates)**

<u>Leisure Proposals</u>

- Amend the plan in Part 1 Section 5 under ‘Elsewhere Across the LDP Area’ to designate land at Swanston as an Adventure Centre. **(1048 Swanston Farms Ltd)**

- Amend the plan to allocate Craigpark Quarry as a Country and Adventure Park. The request to remove the site from the Countryside is considered in Issue 2. **(2085 A & D Brewster)**

Summary of responses (including reasons) by planning authority:

ECONOMIC DEVELOPMENT PROPOSALS

General

- The LDP has removed some proposals while reviewing designations. The requirement for employment land is set by the SDP. Its specific requirement is 186 ha for the Plan to support the delivery of established strategic employment land supply. The office take up in Edinburgh is regularly reviewed (see Development Activity Bulletins: Office Development Schedule 2013, published May 2014 and the Office Demand in Edinburgh Draft Report April 2013). The supply of office space was an issue consulted on as part of the Main Issues Report 2011 (Question 10) where the preferred option supported the deletion of Granton as a strategic office location. No modification proposed. **(0698 David Wilson Homes and J & J Muir; 2086 Persimmon Homes (East Scotland)**
- Current wording is appropriate. While development activity and other indicators have been positive in the immediate past, wider economic circumstances for the plan period are uncertain. No modification proposed. **(1159 New Ingliston Limited)**
- No modification proposed, however, the Council sees merit in this representation as it is acknowledged that it is appropriate to remove reference to the West Edinburgh Planning Framework and update to reference the National Planning Framework 3. **(2088 Scottish Government; 1159 New Ingliston Limited)**
- Paragraph 56 in Part 1 of the Plan supports a range of key sectors, mentioning specifically Higher Education as an example. Paragraph 221 in Part 2 of the Plan also states that 'increasing the amount of purpose-built student accommodation assists the growth of the universities and the attractiveness of the city as a centre for Higher Education'. No additional text is required. No modification proposed. **(2271 Vita Edinburgh 1 Limited)**
- The requirement for Flood Risk Assessments under the Flood Risk Management (Scotland) Act is set out in Policy Env 21 Flood Protection and in Edinburgh Design Guidance (2013). Regardless of whether a proposal in the Plan has an approved masterplan, detailed planning permission will be required and subject to all the provisions of the Plan. It is therefore not necessary to make specific reference to the possibility that detailed proposals for the Special Economic Areas may require a flood risk assessment and to refer to primary legislation. This text change is not justified. No modification proposed. **(2699 Scottish Environment Protection Agency)**

Edinburgh's Special Economic Areas - BioQuarter

- No modification proposed, however the Council sees merit in (part of) this representation. Since there is no formal mechanism for contributions for cross-boundary contributions or to trunk roads, it is not appropriate for a wording change to the Edinburgh BioQuarter Development Principles. However it is acknowledged that the transport assessment has identified an impact on the Sheriffhall

roundabout and contributions towards this could be included in the next published iteration of the Action Programme. **(2088 Scottish Government)**

- No modification proposed, however, the Council sees merit in (part of) this representation. It is acknowledged that an international developer specialising in the life sciences sector is no longer a partner in the Edinburgh BioQuarter Special Economic Area and it is appropriate to remove this reference in Table 2. **(2192 Edinburgh BioQuarter Partners)**

Edinburgh's Special Economic Areas - Edinburgh Airport and Royal Highland Centre

- Whilst Fairview Mill is not within the area identified in the Royal Highland Centre masterplan, Policy Emp 5 sets out the appropriate uses and principles to guide any future redevelopment proposals at this location. No modification proposed. **(1146 Amber Real Estate)**

Edinburgh's Special Economic Areas - International Business Gateway

- Paragraph 59 of the Plan is not intended to give preference to any one of the seven Special Economic Areas, each of which has a distinct role. **(1159 New Ingliston Limited)**
- No change to the title is considered appropriate. This is discussed further in changes sought under Issue 20. No modification proposed. **(1159 New Ingliston Limited)**
- No modification proposed, however the Council sees merit in this representation. It is acknowledged that it is appropriate to amend the text on page 20 to remove reference to West Edinburgh Planning Framework and refer instead to the National Planning Framework 3. **(2088 Scottish Government; 1159 New Ingliston Limited)**
- No specific modification requested other than to comment on the uncertainties and appropriateness of the urban form at the International Business Gateway. Comments noted. No modification proposed. **(2126 Cockburn Association)**

Edinburgh's Special Economic Areas - RBS Headquarters, Gogarburn

- The clause regarding the impact on green belt objectives is critical to ensure that development proposals will not jeopardise the long term, defensible green belt boundary at this location. This issue is dealt with under Issue 2. The reference to 'headquarters' and 'single user office development' remains a relevant description of the use at Gogarburn. No modification proposed. **(2572 Royal Bank of Scotland)**

Edinburgh's Special Economic Areas - Leith Docks

- Monitoring and potential review of strategic land designations is carried out through the preparation of statutory Monitoring Statements and Main Issues Report. No modification proposed. **(2126 Cockburn Association)**

SHOPPING AND LEISURE PROPOSALS

General

- The Council's position on the retail trends in floorspace is set out in the LDP Monitoring Statement (pages 38 – 46). Retail floorspace was an issue consulted on in the Main Issues Report and a report from 2011, Access to Supermarkets and Food Shopping in Edinburgh, took into account qualitative provision and informed the Plan. No modification proposed. **(2093 Aldi Stores Ltd)**

City Centre

- No modification proposed, however the Council sees merit in this representation. It is acknowledged that it may be helpful for the plan to refer to 'Edinburgh St James' instead of the 'St James Quarter' in paragraphs 76 and 77 and Table 7 and elsewhere. **(2268 TIAA Henderson Real Estates)**
- Paragraph 76 clearly states that the key objective of the LDP is to prioritise the city centre and strengthen its shopping role in the region. The city centre's position in the retail hierarchy is clearly stated in Table 6 – Network of Shopping Centres. There is no justification to amend the text in paragraph 77 to refer to the city centre. No modification proposed. **(2268 TIAA Henderson Real Estates)**

Local Centres

- The initial permission for the redevelopment of the Fruitmarket on Chesser Avenue for housing with a significant retail element was granted in 2011 (contrary to officer recommendation).There is no justification to extend the policy description of the Chesser Avenue Local Centre at this point in time. The extent and status of the centre can be considered again in the preparation of future plans once there is development on the ground. No modification proposed. **(0190 Ediston Properties Ltd & West Register)**
- This shopping proposal requires land to be safeguarded for a local centre as the site is planned in accordance with the site brief. It will serve the new population at Brunstane and its requirement reflects the scale of proposed development and distance from existing defined local centres. There is no justification to remove Shopping Proposal S5 from the Plan as part of the allocation of HSG 29. No modification proposed. **(0388 Pauline Cowan)**
- Policy Ret 4 Local Centres requires proposals to be compatible with the character and function of the centre. This enables the different sizes of local centres to be considered. A subdivision of the terms is not considered necessary. No modification proposed. **(1124 Liberton Association)**
- There is no justification to safeguard a local centre at this point in time in the International Business Gateway. Policy Emp 6 proposes a range of ancillary uses to support the business-led development. Other relevant policies in the Plan can be used to assess the appropriateness of retail uses as and when detailed applications come forward within the International Business Gateway boundary. No modification proposed. **(1159 New Ingliston Limited)**
- No modification proposed, however the Council sees merit in this representation, as the last shop unit on Marchmont Road is number 146, to amend the addresses in the Marchmont South Local Centre in Appendix B to include 126-146 Marchmont Road only. **(1726 Marchmont & Sciennes Community Council)**

- The number of shops at Mayfield Road near West Saville Terrace, at Blackford Avenue and at Buckstone Terrace does not justify local centre status in terms of size and/or concentration. No modification proposed. **(2354 Grange/Prestonfield Community Council; 2324 Fairmilehead Community Council)**
- Any proposals for shopping use on the St John's site will be assessed against the relevant shopping policies. The Oxgangs Local Centre boundary encompasses only the purpose built shopping units under flatted development. There is a pending planning application (ref. 14/03807/FUL) for a supermarket on this site. No modification proposed. **(2093 Aldi Stores Ltd)**
- The Council sees no disharmony between the Craigmillar Urban Design Framework (August 2013) and LDP: Figure 5.2 in the Craigmillar Urban Design Framework shows the existing local centre expanded approximately where Shopping Proposal S1 indicative location for the enhancement of the existing Craigmillar centre and development of new retail units. There is therefore is no justification to relocate the S1 symbol on the Proposals Map. Further, there is no justification for a change in shopping designation from local centre to town centre. The current role and characteristics, size and mix of uses are currently compatible with the definition of a local centre in paragraph 73 and the Glossary. The precise boundary and status of the centre will be considered again in future LDPs to reflect any changes on the ground and as the plans for Craigmillar's redevelopment takes place. No modification proposed. **(2536 Parc Craigmillar Ltd)**

Commercial Centres

- Amending the Leith Town Centre boundary to include North Junction Street and Ocean Drive is inappropriate as the distance separating the existing town centre and Ocean Terminal is too great and there are an insufficient number of shop units along North Junction Street and Ocean Drive before the commercial centre. The boundary, character and role of the resulting town centre would not accord with the description of Edinburgh's town centres in paragraph 73 and would impact on the functioning of the wider network of shopping centres. The future role of Ocean Terminal Commercial Centre as set out in Table 7 states that future increase in floorspace must reflect the scale and phasing of residential development. On that basis there is no justification to amend its status in Table 7. Proposals for additional floorspace will be assessed against Ret 3. No modification proposed. **(2346 Ocean Terminal Ltd)**
- There is no justification to amend the text in Table 7. It is considered an accurate description of the current characteristics. This can be considered in the preparation of the next plan if appropriate to reflect any development on the ground in the surrounding area and if the centre reconfigures using existing approvals. There is still the need to state in Current Commitments and Future Role that there is a commitment to limit the total amount of new floorspace. No modification proposed. **(0838 Gibraltar General Partner Ltd)**
- There is a commitment to limit the retail unit size in Table 7. The cap on total retail floorspace at 71,502 sqm reflects the existing partly implemented approvals. No modification proposed. **(2268 TIAA Henderson Real Estates; 2346 Ocean Terminal Ltd)**

Leisure Proposals

- Any future proposals for leisure and recreation uses in these locations can be

assessed using Policy Env 10 and other relevant policies, which provide appropriate support and criteria to consider such uses. No modification proposed. **(1048 Swanston Farms Ltd; 2085 A & D Brewster)**

Reporter's conclusions:

ECONOMIC DEVELOPMENT

General

1. In general terms, I would expect economic proposals from the existing adopted Edinburgh City Local Plan to be carried forward into the local development plan where there is no material change in circumstances. However, I recognise that proposals for business and industrial development must be deliverable in the plan period, and if there is evidence that older allocations are no longer viable, this needs to be considered. I note that the council has removed some proposals whilst reviewing the designations. This representation however contains no site specific information about proposals that may no longer be viable. I find that the council has generally taken account of the need to give priority to locations with access to sustainable transport throughout its approach to the identification of development sites, particularly where they include housing, although individual development sites are examined in this context where there are specific representations on this matter. I find that there is no evidence to justify any change to the proposed plan with respect to this representation.

2. The representations relating to National Planning Framework 3, the West Edinburgh Planning Framework, Table 2, Policy Emp 6 and a new proposal for the International Business Gateway are all addressed within Issue 20, and I refer to the findings on these matters under that issue. The references to the West Edinburgh Planning Framework should be replaced by National Planning Framework 3 where appropriate. The special economic areas in Table 2 are examined with respect to proposals in West Edinburgh, and some modifications to the proposed plan are recommended with respect to the International Business Gateway and Gogarburn. The development of the International Business Gateway is dependent upon the continuing masterplan process, there is no requirement for a new proposal and only minor changes to Policy Emp 6 are required.

3. I consider that the prospects for growth in the International Business Gateway are sufficiently provided for within the development principles and Policy Emp 6. I find that there is insufficient evidence provided within the representation and supporting documents to justify a different approach in the text of the plan as a whole, in order to be more positive about the overall economic development prospects for the city's growth.

4. With respect to the representation seeking a review of the economic land supply and take up rates, SESplan requires local development plans to support the delivery of the established strategic employment land. For the City of Edinburgh the provision of some 186 hectares of employment land is required by Policy 2. The local development plan does not set out the quantity of employment land provided for. However, paragraph 58 states that SESplan requires the local development plan to retain existing levels of strategic employment land and provide a generous range and choice of employment sites in accessible locations, and there is nothing to suggest that the strategic requirement identified in SESplan has not been met. Policy Emp 8 protects the established supply and Policy Emp 9 establishes criteria for the consideration of alternative uses. I find in this context that the plan's employment policies are consistent with SESplan, and that

there is no requirement for me to examine the demand for and supply of such land.

5. I note that paragraph 56 refers to the strength of Edinburgh's economy being based on a range of key sectors, including higher education. I find that there is no requirement to add to this in terms of general support for higher education. However, I also note that Policy Hou 8 makes provision for student accommodation as part of the suite of housing policies. Paragraph 221 states that increasing the amount of purpose-built student accommodation assists the growth of the universities and the attractiveness of the city as a centre for Higher Education. I consider that it is quite important to link this specialised housing provision to the importance of the higher education sector referred to in paragraph 56, and I therefore find that there should be a reference to this in the final sentence of paragraph 56, as set out in my recommendations below.

6. The special economic areas are all located within or adjacent to a functional flood plan, or area of known flood risk. However, the text in paragraph 59 is to set out the purpose of these special economic areas. Referring to one of multiple infrastructure issues that may need to be addressed would be out of context. The council's response refers to Policy Env 21, which sets out the requirement for flood risk assessments. Furthermore, the recommendations to the council with respect to all of the proposed development sites which are subject to flood risk, and have development principles covering key infrastructure requirements, include provisions for flood risk assessments to be undertaken, and/or set out flood risk mitigation measures, where these have been identified by the Scottish Environment Protection Agency. No additional text is therefore required to paragraph 59.

<u>Edinburgh's Special Economic Areas – BioQuarter</u>

7. Paragraph 86 of the local development plan states that junction improvements T17 to T21 are required in conjunction with hew housing proposals in West and South East Edinburgh. Proposal T14 relates to the Sheriffhall junction, requiring grade separation of the existing roundabout junction on the city bypass, and including provision relating to bus priority and safe crossing for pedestrians and cyclists. The representation on behalf of the Scottish Government concerns the effect of the potential scale of development within the BioQuarter, which is additional to the effect of development from the proposed housing sites in South East Edinburgh, as set out in the transport appraisal.

8. In addition, the design of this junction improvement will need to take into account cross boundary issues with respect to development elsewhere in the SESplan area, and I find that this is particularly relevant to development within Midlothian and East Lothian. I refer to the conclusions within Issue 19, to the effect that a new policy is required in order to address this matter, particularly with respect to the trunk road network. This policy would refer to the approach to the delivery of the required transport infrastructure, set out in Policy Del 1 (Developer Contributions and Infrastructure Delivery), and detailed within Supplementary Guidance required through that policy.

9. The scale of development within the BioQuarter may have an effect on this process, and particularly with respect to Proposal T14. The Supplementary Guidance would include the necessary approach to developer contributions required for the delivery of transport interventions, where this is necessary, including Proposal T14. The action programme would be updated to take all of this into account, but that is a matter which is outwith the remit of this examination. I therefore find that a new bullet point should be added to the development principles in the terms set out in my recommendations below.

10. With respect to the partnership promoting this development as specified in Table 2, I note that an international developer specialising in life sciences is no longer involved, and I therefore find that the text of Table 2 should be amended to take this into account. I note that there is no reference to this within the development principles for the BioQuarter set out on page 68 of the local development plan. There is also a representation from SEPA (not referred to above) which essentially concerns the need for strategic sustainable urban drainage systems in South East Edinburgh, which includes the BioQuarter. However, the representation supports the provisions of Policy Emp 2 and does not request any changes, reserving its comments for the action programme in due course.

Edinburgh's Special Economic Areas – Edinburgh Airport and the Royal Highland Centre

11. Policies Emp 4 and Emp 5 relate to this area, and refer specifically to the development of the Airport and Royal Highland Centre respectively. These areas are joined to the east by the International Business Gateway to which Policy Emp 6 applies. The 3 areas are contiguous to one another to the north of the A8 between the Newbridge and Gogar junctions, forming a key part of the West Edinburgh Strategic Development Area.

12. The representation concerns an area of just over 4 hectares, which contains an industrial use not directly connected with the airport or the Royal Highland Centre, although part of the area is used for car parking related to the airport. It would be logical for any future development of this area to be related to the airport or the Royal Highland Centre, but it does not have to be, and it may be that employment use independent of the airport and Royal Highland Centre will continue on the site within the local development plan period and beyond. I note that the masterplan (and related planning permission in principle for the redevelopment and extension of the showground site) for the Royal Highland Centre does not include the site.

13. I also note that Figure 13 of the local development plan actually shows the site within the airport boundary, rather than that of the Royal Highland Centre, although the proposals map clearly shows the site within the boundary of Policy Emp 5 relating to the Royal Highland Centre. Figure 13 is indicative and I find that there is no requirement for any change to this. However, I also find that the council's response, which states that Policy Emp 5 sets out appropriate uses and principles to guide any future redevelopment proposals for the site, is not accurate because future development may not necessarily be related to the Royal Highland Centre.

14. This is partly addressed by recommendations to the council elsewhere in this examination to modify the status of the masterplan with respect to Policy Emp 5. However, I find that it is unreasonable to apply Policy Emp 5 (even with revised text) to the site related to the representation, because it may constrain development which would otherwise be compatible with this part of the West Edinburgh Strategic Development Area and the remainder of the policies in the local development plan.

15. I therefore find that the boundary for Policy Emp 5 should be amended on the proposals map to exclude the site referred to in the representation. Although this would leave a small area outwith the combined boundaries of the airport and the Royal Highland Centre, leaving a small gap as a result, I consider that this is unlikely to be problematic. It would allow flexibility in the future to either develop the area independently or in connection with the airport or Royal Highland Centre. The matter could be reconsidered

in the next local development plan review. Whilst the area could be separately designated for business and industry, this is not requested within the representation, and I find that the most appropriate course of action is to leave the area undesignated. The special economic area designation should be removed from the site as it does not fit in with the description of this area, either for the airport or the Royal Highland Centre, in Table 2.

Edinburgh's Special Economic Areas – International Business Gateway

16. Paragraph 59 and Table 2 set out the council's approach to the special economic areas. The West Edinburgh Planning Framework has now been withdrawn, and there is a recommendation in Issue 20 to alter the entry for the International Business Gateway in Table 2, following the examination of representations relating to that issue.

17. Paragraph 59 and Table 2 give appropriate emphasis to the International Business Gateway as one of seven special economic areas. I recognise that the purpose of Table 2 is not to prioritise any of these areas, which are all important to the development of the economy within the City of Edinburgh. However, I consider that the key role of the International Business Gateway could be more accurately described, and I therefore find that a further sentence should be added after the first sentence (in similar terms to that in the representation). Appropriate text for this is included in my recommendations below, and this is cross referenced in the conclusions within Issue 20.

18. There is no requirement to specifically refer to Policy Emp 6 in the table itself, as this is sufficiently covered within paragraph 59. The representation seeking a new proposal for the International Business Gateway is considered within Issue 20, where the findings do not support such a change. There is therefore no requirement to further amend the text within Table 2 in this context.

19. The mix of uses and design concept for the International Business Gateway are also examined within Issue 20, and I refer to the findings there on this matter also. Beyond the stated development principles (revised as appropriate and including general development principles through Policy Del 1) and Policy Emp 6, these are matters for the masterplan and development management process in due course, and no changes to the text within Table 2 are required beyond those recommended within Issue 20 (including the additional sentence referred to above).

Edinburgh's Special Economic Areas – RBS Headquarters, Gogarburn

20. All of the matters raised within this representation are addressed within Issues 2 (relating to the green belt) and 20 (relating to the status of the RBS headquarters and proposed extension) where there is a recommendation (through Issue 20) to amend the text of Table 2 to remove the words "single user" from the first line. Otherwise, it is recommended through Issues 2 and 20 that the site should remain within the green belt and that the proposed extension should not be incorporated into the proposed plan.

Edinburgh's Special Economic Areas – Leith Docks

21. The designation for particular uses within Proposals EW 1d and EW 1e is examined in Issue 20, where there is a finding that this has to be based upon the best evidence that is available at the time the local development plan is prepared, and that there is no evidence to suggest that renewable energy projects relating to deep water berths outside

the current port local gates would be inappropriate. Table 2 includes reference to the potential of Leith Docks for the manufacturing and servicing of wind turbines and other equipment to support the off-shore renewables industry, and it would be necessary to monitor this, as with any other provision in the local development plan, to ensure its continued relevance. This is a standard requirement of the development planning process (monitoring statements and the main issues report), and does not require to be stated in the text of Table 2.

SHOPPING AND LEISURE PROPOSALS

General

22. The representation on this matter concerns a general premise within the proposed plan that there will be limited demand for additional retail floor space over the next 5 years, and refers to the store expansion programme of retailers across Scotland. In particular, it is submitted that there is a need to address qualitative deficiencies in the plan, which should not be stifled in the manner set out in paragraph 77 of the proposed plan.

23. Paragraph 77 explains the priority being given to town centres over commercial centres, and states that there is not expected to be sufficient growth in retail spending over the next five years to support further expansion of commercial centres (over and above that which already has planning permission), whilst also sustaining the existing network of town and local centres. The paragraph goes on to state that spending growth will be below that experienced in recent decades, this being offset by more efficient use of sales space and a continued increase in internet shopping.

24. The paragraph also states however that there may be opportunities to improve the quality of shopping provision, and paragraph 78 indicates that the matter will be kept under review, and (whilst town centres are likely to remain the preferred location) policies relating to commercial centres may be revised in future plans. Table 6 sets out the network of shopping centres including the city centre, 8 other town centres, 7 commercial centres and existing local centres including 4 proposed new local centres. Table 7 explains the existing role of the commercial centres and sets out current commitments and their future role, and Table 8 sets out proposed new (or enhanced) local centres.

25. I note that substantial representations were made on this matter at the main issues report stage, and I have reviewed the process undertaken by the council. I find that this process has been robust and that the council's general approach to retail development accords with Scottish Planning Policy and SESplan and takes an appropriate sequential approach. I also refer to the findings in Issue 23 and the recommended inclusion of a town centres first policy in the context of Scottish Planning Policy. Whilst the policy for commercial centres (Policy Ret 3) follows on from paragraph 77 of the plan, I note that proposals for additional floor space in commercial centres may be supported where they address a quantitative or qualitative deficiency in the plan.

26. I therefore find that, in overall terms, the approach to retail development in the proposed plan, subject to the recommendations within Issue 23, is appropriate, and that paragraph 77 takes a balanced approach in this context. I find that there is no requirement for any change to this paragraph, or any other provision of the plan, with respect to this representation.

City Centre

27. It is clear that the city centre retail core is at the top of the retail hierarchy in Table 6 and in paragraph 76. Whilst I accept that it may have been helpful and more consistent to refer to the city centre in paragraph 77 (with town centres) it is clear that the reference is a generalisation of the hierarchy, and I find that it does not in any way undermine the role of the city centre. The paragraph is sufficient and appropriate in the context of Circular 6/2013, and no change in required on this matter.

28. The proposed change to paragraph 76 to refer to "Edinburgh St James" is addressed within Issue 20, together with other references in the proposed plan which require a similar change for consistency. It is recommended there that (within the development principles in Table 10 and under Proposal CC 1) the name of the location is changed from "St James Quarter" to "Edinburgh St James". A similar change is required to the aerial photograph on page 41, and in paragraphs 76, 133 and 190.

Local Centres

Chesser Avenue Local Centre

29. I note that planning permission in principle was granted in June 2012 for a mixed use development (including retail and residential development) on the former fruit market site to the east of Chesser Avenue, north of the existing local centre. Subsequently, various applications have been submitted for 8 retail units and car parking on the western part of the site (adjacent to Chesser Avenue), and residential development on the site to the east. The representation seeks inclusion of the retail element of the mixed use development within the local centre. Following on from this, the representation also requests that the local centre be re-designated as a commercial centre based on the new range of goods and services that will be available. It is considered that the footprint and function of the extended centre would be well above the scale of a local centre.

30. Following my site inspection, I note that the proposed retail units are now under construction. Although these retail units are not directly adjacent to the local centre, they adjoin the north corner of an area of open space which separates the retail units from the local centre as currently designated. The nature of the retail development is such that it constitutes a significant addition to the existing retail and other services which are available within or adjacent to this local centre. The local centre is in any event significantly different from other local centres in that there is only a very small group of traditional shops on the east side of Chesser Avenue. Otherwise, it comprises an ASDA supermarket and the Corn Exchange, which appears to be a significant leisure facility and community centre.

31. I recognise that a report was submitted to the council recommending that the retail development be refused and I have noted the reasons for this. However, having granted planning permission for the proposed development, I do not consider that the council can now set aside this development management decision, which constitutes a significant material change in the circumstances relating to the area in the vicinity of and related to this local centre. The decision as to whether or not the local centre should be extended should be based upon the circumstances now applying to the site.

32. Following a further information request, the council has expressed concern about the fragmentation of the local centre, the introduction of new "edge of centre" locations which

would be subject to pressure for further retail or commercial development, and the increased pressure for the development of the open space in front of the Corn Exchange. I recognise that there is a difficulty in defining a boundary, as the retail units on the east side of Chesser Avenue are not directly adjacent to the existing local centre. In this respect there is a key issue about the role of the designated open space in front of the Corn Exchange, in the event that the local centre is extended, and I consider this further below.

33. However, I do not consider that the potential pressure on new "edge of centre" locations carries significant weight, because in my view the boundary of a local centre should be based on the nature and function of the uses considered appropriate for the local centre. I have no doubt in this case that the retail units on the east side of Chesser Avenue are appropriate for inclusion in a local centre. Proposed "edge of centre" retail development in the future would need to be considered on its merits.

34. As far as the open space in front of the Corn Exchange is concerned, I note that this is not included within the existing local centre, although the open space to the south east (in front of ASDA) is so included. The response to the further information request (on behalf of the party promoting the extension) suggests that there is nothing to preclude the open space being included within the local centre. I find that it should indeed be included if the local centre is extended to include the retail units on the east side of Chesser Avenue, in order to define a logical boundary for the local centre. Even then it would only adjoin the local centre at its northern corner, although I do not consider that this is necessarily a major obstacle.

35. However, I agree with the council that this open space is an important community facility, which also provides the setting for the Corn Exchange. So the remaining issue is whether or not there would be any significant adverse effect on the open space (including pressure for development). In the first instance, local centres do not just include shopping facilities. Paragraphs 73 and 74 of the local development plan indicate that local centres include community facilities, and I see no reason why this should not extend to open space in appropriate circumstances.

36. In addition, the open space is already designated as such on the proposals map, and I find that it should continue to be so designated if the local centre is extended to include the open space. It would then be commensurate with the open space to the south east. Policy Env 18 applies to open space as designated on the proposals map, and this provides significant protection for open space. It does not rule out development, but such would have to demonstrate that the loss of the open space would not have any significant impact on the quality or character of the local environment, amongst other things. This would be no different for further retail or commercial development within a local centre.

37. I therefore conclude that it would be appropriate to extend the local centre to include the retail development on the east side of Chesser Avenue, and the open space in front of the Corn Exchange. The open space should remain designated as such on the proposals map. A consequential change to Appendix B is required. I considered the possibility of a more robust policy context for this local centre, given its unique and diverse character, but on balance I am satisfied that any future development within the local centre (as extended) could be satisfactorily addressed through the development management process.

38. With respect to the re-designation of the centre as a commercial centre, I note that

there are seven shopping malls and retail parks, of varying sizes, designated as commercial centres in the local development plan. Commercial centres are defined as centres of strategic importance which have a more specific focus on shopping or shopping/leisure uses and do not have the diverse mix of uses found in town centres.

39. Whilst I accept that the uses within this local centre, as extended, would fit in with the description of uses within a commercial centre, I find that the centre remains more of local importance than strategic importance, even though it would constitute one of the larger local centres. It primarily appears to have a focus as a shopping and leisure destination for the local community rather than a wider strategic role. Furthermore, I note that the local plan does not currently envisage the expansion of commercial centres beyond the level of development already approved, and I find that this also weighs against promoting even a large local centre to the status of a commercial centre, which would not appear to have any significant purpose. I therefore conclude that the Chesser Avenue Local Centre, as extended, should remain designated as a local centre in the local development plan

Brunstane Local Centre

40. The proposed new Brunstane Local Centre lies within the site of Proposal HSG 29, and an indicative location is shown on the proposals map and within the diagram in the Brunstane and Newcraighall site brief. The need for this proposed local centre is directly related to the proposed housing site, and this is examined within Issue 10.

41. I note the representation supporting the proposed Brunstane Local Centre, and the need for a pharmacy to support the local population. However, it would not be appropriate to specify the nature of the retail units to be contained within the centre, either within Table 8 or within the site brief and its associated diagram. This would be a matter for the development management process in due course.

Definition of Local Centres

42. Local centres are defined in the final bullet point within paragraph 73 of the proposed plan, and I agree that there is a wide range of local centres in terms of scale and type. However, they all have in common that they meet the local (primarily convenience) needs of the community within walking distance. The size of the centre varies according to the historical growth of the centre, the local population served and the distance to other shopping facilities and services. However, it is not the purpose of the plan to describe the size and nature of the facilities, but rather to place local centres within an appropriate shopping hierarchy and to guide new retail development to the most appropriate place. In my view the proposed plan achieves that aim, and Policy Ret 4 sets out the criteria against which proposals for retail (or other) development in or adjacent to local centres will be considered. New local centres are also proposed in the plan, and appropriate details are provided within Table 8. Once established, proposed development in or adjacent to new local centres will also fall to be considered under Policy Ret 4.

International Business Gateway

43. With respect to the International Business Gateway, representations are examined within Issue 20, and I refer to the findings there which set the context for considering whether or not new local shopping centres should be identified within the International Business Gateway. The mix of uses on this site, including the potential for housing

development, is comprehensively examined in Issue 20, following which it is clear that the continuing masterplan process will be important in defining the actual mix of uses on the site. If find that this would extend to consideration as to whether a new local centre would be justified.

44. At the present time, I find that there is insufficient evidence to incorporate one or more local centres. The recommendation in Issue 20 is to delete the diagram associated with the development principles given the evolving nature of the masterplan. I find that there is therefore no justification for the inclusion of a local centre within Tables 6 and/or 8, and that this should be left to further detailed consideration through the masterplan and development management process. I therefore find that there should be no change to the proposed plan with respect to this matter. The matter should however be reconsidered at the next review of the local development plan.

Marchmont South Local Centre

45. A minor correction is suggested to Appendix B, identifying the properties within the Marchmont South Local Centre as 126 to 146 Marchmont Road, and as the council has agreed that this correction would be appropriate, I find that Appendix B should be amended accordingly. I note the representation expressing support for this local centre.

Mayfield Road and Buckstone Terrace

46. I have noted the requested inclusion of local shopping centres in the areas of Mayfield Road and Buckstone Terrace. In particular, there are 2 parades of shops at 55 to 69 Mayfield Road and 2 to16 Buckstone Terrace, both of which constitute around 10 shops and services each, which is borderline in terms of the definition of a local centre in the local development plan. The definition does however state that in some instances, centres of less than 10 units have been included in order to provide a local centre within 15 minutes walk of residents.

47. A further information request to the council has resulted in the council indicating that both of these shopping parades perform a local centre role, and that their inclusion as local centres would not undermine Policy Ret 4 of the local development plan relating to local centres. In addition, following my inspection of these areas, I am satisfied that they are busy and viable shopping parades which would benefit from their identification as local centres, and consideration of development in the context of Policy Ret 4.

48. There are in addition small groups of shops within the Mayfield Road area which are referred to in the representations, but these are too small to be considered as local centres. In any event, the purpose of local shopping centre designation is not specifically to protect existing trading within the centre, but rather to ensure that new retail (or other) development within or adjacent to the centre is appropriate in terms of the centre's function. Policy Ret 9 provides an appropriate framework for the consideration of development relating to existing shops outwith designated centres.

49. In overall terms, I conclude that the parades of shops at 55 to 69 Mayfield Road and 2 to16 Buckstone Terrace should be designated as local centres on the proposals map and added to Table 6 (5) as proposed new local centres. For the avoidance of doubt, the parade of shops at Buckstone Terrace does not include the wine merchants separated by housing development and a side street from the terrace of shops.

Oxgangs Local Centre

50. I note the requested extension of the local centre to include St John's Church, the library and public house. Whilst I accept that such uses may be generally appropriate within local centres in the context of Scottish Planning Policy, in this case these uses are adjacent to (and occupy a much larger area than) the existing local centre, which only includes 2 small parades of around 15 shops and services in total, either side of the Oxgangs Broadway. Careful consideration therefore needs to be given to the extent of these uses, and their relationship to the parade of shops. With respect to the public house and library, these are related to the local centre, but they occupy a significantly larger area. On their own merits, it is debatable whether or not they should be included.

51. The site of the church (as existing) is not sufficiently related to the local centre in terms of use, scale or proximity for inclusion in the local centre. The use also appears to have ceased. However, following a further information request to the council, I note that the council is now minded to grant planning permission for a supermarket of some 1,500 square metres on the site. This proposed new use for the site is more directly related to the function of a local centre than the existing library and public house uses, being primarily a local convenience retail use. Furthermore, if this site is included in the local centre based upon the proposed new use, it would justify the inclusion of the library and public house, given that they are also appropriate uses for a local centre, and would then lie between the existing shops and the proposed supermarket.

52. The council has indicated that the purpose of the representation has effectively been realised through the development management process, with which I agree, but this nevertheless remains an unresolved representation which I have to examine in a consistent manner with the other representations. The council is concerned about the expansion of the centre leading to pressure for further retail or commercial development in "edge of centre" locations, and to this extent the case is similar to the Chesser Avenue Local Centre examined above. Again, I find that the potential pressure on new "edge of centre" locations does not carry significant weight, because the boundary of a local centre should be based on the nature and function of the uses considered appropriate for the local centre. Further applications should be considered on their merits in this context.

53. I recognise that this matter could be further considered at the next local development plan review. However, I find that the justification for the proposed extension of this local centre is sufficiently clear at this point in time, and I therefore conclude that the local centre should be extended to include the site of the proposed supermarket, which from the layout plan submitted with the further information request constitutes the site currently occupied by the now disused St John's Church and the former Social Work Centre adjacent to the church, which (although not being covered by the representation) would also have to be included. Following on from this, the site of the public house and library should also be included for consistency. I conclude that the local centre would then properly represent the uses in the area which are appropriate to the function and definition of a local centre. A consequential change to Appendix B is required.

Craigmillar Local Centre

54. Craigmillar is defined as a local centre in Table 6, and in Table 8 there is a proposal (Proposal S1) to enhance the role of the local centre through the development of new retail units and other local facilities as part of the wider regeneration of Craigmillar. In addition, there are proposals for housing sites in the Craigmillar area (HSG 14 to 18).

Furthermore, Proposal SCH 2 is for a new High School which is shown by a symbol on the proposals map to the east of the local centre.

55. Following my site inspection, I have noted that this is a relatively large shopping centre with over 20 shops and services, mainly along the south side of the main road, together with a supermarket in the south eastern section of the local centre. There is a police station to the north of the main road, but otherwise this area of the local centre contains what appear to be temporary commercial uses, and a significant area of vacant land which appears readily available for development, and would probably be the focus for Proposal S1 referred to above. There is a neighbourhood council office to the east of this area, but outwith the local centre designation. To the east of this is an extensive area of vacant land which extends to Proposal HSG 14, and is where the proposed new high school is likely to be located, although a specific site for this school has yet to be identified in the plan.

56. I note the reference in the representation to the Craigmillar Urban Design Framework (approved in 2013), indicating that this seeks a stronger indication of a retail destination that includes a main shopping centre to serve the whole of the Craigmillar area, shops on both sides of Niddrie Mains Road, the creation of new places around shops and centres and a new anchor store. I have reviewed the urban design framework (which in overall terms is much wider than just considering the role of the local centre) and I find that the above is a reasonable summary of the key planning principles relating to the further development of the local centre.

57. However, whilst the local centre as shown in Figure 5.2 extends to include the neighbourhood council office and surrounding land, this is not what is included in the existing adopted local plan. Indeed, the centre as shown in adopted local plan is carried forward to the local development plan, and the key issue in this respect is whether there is a significant change in circumstances (provided through the urban design framework approved in 2013) which would justify an extension of the local centre as proposed.

58. I also note that a masterplan has been prepared for the proposed new High School which refers to the school being located in or near Craigmillar's main shopping centre on Niddrie Mains Road, although it is stated that the exact location is still to be decided. The representation suggests that this site should be clarified in the local development plan, but I find that the exact location of the proposed school has not been sufficiently determined in order to justify its inclusion in the local development plan other than by a symbol.

59. I have taken account of the schedule of uses from the Craigmillar Town Centre Health Check (2014) and I recognise the need for improvement of the centre in the terms identified above. Furthermore, I note that planning permission in principle has been granted for a mixed use development (including retail) north of Niddrie Mains Road, at the eastern end of the proposed extension. This again brings into the frame the arguments in relation to the Chesser and Oxgangs Local Centres examined above. However, in this case the area concerned is only a small part of the requested extension, with a significant gap between this site and the existing local centre boundary. The area is also designated for housing under Proposal HSG 14 in the local development plan.

60. In addition, it appears to me following my site inspection, that there is significant scope for the enhancement of this local centre within the existing street frontages and within the now vacant land to the north of the main road, within the existing local centre

designation. In overall terms, I find that there is insufficient justification for extending the local centre in the terms of the representation, and that any future extension of the local centre should in the circumstances be considered at the next review of the local development plan.

61. Furthermore, whilst this is a relatively large local centre, I find that it accords with the definition of a local centre in the glossary of the plan. It is primarily to serve the Craigmillar area, as covered in the urban design framework It is not in my view of the scale or variety of uses which would normally define a town centre, although the enhancement of the local centre under Proposal S1 may change its role to some extent, and the council has confirmed that the level of retail and service floor space could extend to some 14,700 square metres on the basis of known commitments.

62. This figure is disputed on behalf of the party making the representation, but I do not necessarily consider that it would be appropriate to include the existing neighbourhood council office or the proposed school within these figures when comparing to other town centres. So this is indeed generally at or below the lower end of retail and service floor space within designated town centres. In any event, this matter is likely to be further examined in the next review of the local development plan, once Proposal S1 has been implemented, and the role of this local centre in the shopping hierarchy may need to be revisited at that time.

63. I therefore conclude that the local centre should not be extended beyond its boundaries as shown on the proposals map, and that there is insufficient justification for its designation as a town centre at the present time. These matters should be further considered in the next local development plan review.

Commercial Centres – Ocean Terminal and Fort Kinnaird

64. There are two representations under the heading of commercial centres concerning Ocean Terminal and Fort Kinnaird, and the balance between the two centres. Both are listed in Table 7, with the latter being described as one of the largest out-of-centre shopping areas in the UK, with some 60 retail units. The bus and walking catchment is stated to be limited. The commitments and future role include planning permission granted in 2011 to reconfigure the centre, and retail floor space being capped at 71,502 square metres. There is a commitment to limit retail unit sizes and the amount of new floor space.

65. Ocean Terminal is described as Edinburgh's newest shopping mall (2001) offering a range of high street retailing, including an anchor department store. It has related service facilities (including a cinema) and is linked to the regeneration of the Edinburgh Waterfront. It is well served by buses and comprises 80 units. The commitments and future role state that any future increase must reflect the scale and phasing of residential development.

66. There is essentially a two-part representation on behalf of Ocean Terminal Ltd, seeking a more positive framework for the consideration of proposals there, and a less positive framework for considering proposals at Fort Kinnaird. However, I find that it would be quite difficult to draw up a policy framework for commercial centres based upon the individual needs of each centre. It appears to me that the council has taken the very sensible approach of providing a policy framework for commercial centres, within a shopping hierarchy in accordance with Scottish Planning Policy, which relates to the

broad function of all commercial centres and places priority on town centres. The presumption against expansion is in the circumstances justified, and I refer to my general findings at the start of the shopping and leisure section above in this context.

67. Nevertheless, the first criterion in Policy Ret 3 indicates that proposals may be supported where they would address a quantitative or qualitative deficiency within the catchment area, at the same time as being mindful of the sequential approach through the second and third criteria. This is also sensible, and combined with the commitments and future role for each centre described in Table 7, provides a sound basis for the consideration of individual development proposals. I find that for the Ocean Terminal the link to the phasing of residential development within the waterfront regeneration proposals is reasonable, and provides a key trigger for any required quantitative and/or qualitative improvements. Notwithstanding this, it would be possible to make a case for other required quantitative and/or qualitative improvements (for example related to other development in the waterfront or the role of the Leith Docks as a special economic area) in the context of the first criteria with Policy Ret 3.

68. The alternative of extending the Leith Town Centre to include Ocean Terminal however requires further consideration. I acknowledge that the type of retail uses and services therein would be commensurate with a town centre location, but the nature of Ocean Terminal nevertheless fits into the definition of commercial centres in the glossary of the plan. Furthermore, extending the linear nature of the Leith Town Centre would make access by sustainable transport means more difficult. In addition, and from my site inspection, I find that the frontage of the main road linking the Leith Town Centre with Ocean Terminal does not have a substantial retail frontage, which means that it would not be appropriate to include this within the established town centre.

69. The textual changes to Table 7 in respect of Fort Kinnaird seeking no further growth, space for bulky goods being retained and amending the figure for a cap on retail floor space to a cap on total floor space would not be justified. The first and second may not accord with the first criteria of Policy Ret 3, and the second is really too detailed a provision for the local development plan in any event. There is insufficient evidence to suggest that the precise figure in Table 7 needs to include non-retail floor space.

70. The representation on behalf of Gibraltar General Partner Ltd is essentially seeking to amend the text in Table 7 in respect of Fort Kinnaird in the opposite direction to that sought on behalf of Ocean Terminal Ltd. In the first instance, I find that the proposed text is too detailed for the local development plan, and therefore unnecessary. Secondly, whilst I recognise that Proposals HSG 26, 27 and 29 would significantly increase the extent of the urban area in South East Edinburgh, and increase the local catchment for the commercial centre (also increasing sustainability together with improved public transport links and the modal shift from car usage), the main function of the commercial centre would remain that of a large out-of-centre retail facility. The limit on retail floor space within the current commitments and future role is therefore appropriate. I find that the council has provided a reasonable balance between the two centres within the text for both within Table 7. The purpose of table 7 is in my view to set out the role for each of the commercial centres, not necessarily to reflect Policy Ret 3 or the supporting text for that policy.

71. There is a third representation essentially seeking no further growth (and limiting retail unit sizes) with respect to the Fort Kinnaird commercial centre. In this case the concern is about the potential risks to the city centre. However, my findings above still

generally apply. Table 7 refers to an existing cap on retail floor space at 71,502 square metres, which together with Policy Ret 3 is sufficient in protecting the role of the city centre as the regional core. The city centre is the first priority in the retail hierarchy, and I do not consider the assets within the city centre or investor confidence is likely to be prejudiced by the provisions of the proposed plan relating to the Fort Kinnaird commercial centre.

72. I conclude in overall terms that no change is required with respect to the provisions of the local development plan for either commercial centre, and that there is no justification for extending the Leith Town Centre to include the Ocean Terminal commercial centre.

Leisure Proposals

73. Outwith the strategic development areas, the only specific development proposals in the local development plan relate to proposed housing in Queensferry, Curriemuirend, Currie and Balerno. Development principles and related diagrams have been set out in the plan for these development proposals. However, the proposal for Curriemuirend also includes a proposal to improve the quality of existing greenspace at Clovenstone Drive under Proposal GS 10. Table 1 includes a series of greenspace proposals including Proposal GS 10, but these do not reference active leisure or tourism proposals other than the incorporation of sports pitches and parkland. There is nothing in the proposed plan of the nature of the proposals sought within these representations for adventure parks at Swanston and Craigpark Quarry. In both cases it appears that extensive groundwork has already been done in order to prepare for and advance these proposals.

74. Detailed submissions have been included with the representation relating to Swanston, where an initial draft business case was prepared in 2012 in discussion with the two planning authorities involved (a small part of the site being within Midlothian Council's administrative area) and various stakeholder leisure/tourism organisations. The area lies within green belt and includes farmland and 2 existing golf courses. Appendix 1 to the representation sets out indicative proposals for low impact leisure activities and an outdoor activities hub, which may include various leisure and tourism facilities, including related retail and hotel uses. The representation seeks an additional proposal in the plan for the proposed adventure centre.

75. With respect to Craigpark Quarry, this is a former quarry (now disused) constituting a brownfield site. Whilst I note that there is a policy in the adopted Rural West Edinburgh Local Plan, supporting proposals for the re-use of the quarry, in the proposed local development plan the site lies within a countryside policy area under Policy Env 10. The representation seeks the removal of the site from the countryside, and its allocation for a country and adventure park, with associated leisure, recreation and tourism development. Suggested development principles are set out.

76. Both of these matters were raised within representations at the main issues report stage. However, whilst proposals could possibly have been included in the proposed plan, it is not clear that they have advanced to a stage where all of the potential environment effects have been considered, or that the projects are deliverable within the plan period. The proposals would otherwise fall to be considered under Policy Env 10, development in the green belt and countryside, where criterion a) provides for countryside recreation. Tourism is referred to within the local development plan, particularly in relation to specific development proposals, although there is no specific policy relating to tourism. In any event, I find that there is sufficient scope for the positive consideration of

these development proposals in the context of Policy Env 10.

77. Furthermore, in the context of Circular 6/2013, I am examining these representations on the basis of whether or not the plan is sufficient and appropriate without specific proposals being included for these proposed leisure/tourism developments. I find that their inclusion in the plan and on the proposals map is not in the circumstances necessary, and that it is reasonable to consider subsequent individual development proposals in the context of Policy Env 10. The inclusion of specific proposals would also not necessarily be consistent with the general approach to potential leisure/tourism proposals in the plan, where it appears that the council intends to rely on Policy Env 10. No change to the proposed plan is therefore required with respect to these representations.

Reporter's recommendations:

Modify the proposed plan as follows:

1. Paragraph 56 – amend the final sentence as follows:

The LDP supports existing businesses, makes specific provision for a growing student population, continues to promote previously identified economic proposals and highlights new investment opportunities.

2. Edinburgh BioQuarter Development Principles – add bullet point as follows:
The BioQuarter may require to contribute to improvements to the A720 Sheriffhall junction improvements.

3. Table 2 – Edinburgh BioQuarter – amend the second sentence under main purpose as follows:

Its development is being promoted by a partnership of the Council and Scottish Enterprise, University of Edinburgh and NHS Lothian.

4. Proposals Map – amend the boundary of Policy Emp 5 by excluding the area to the east of Ingliston Road and north of Fairview Road, and exclude the omitted area from the special economic area designation. The area should have no specific designation on the proposals map.

5. Table 2 – International Business Gateway - add after the first sentence (as amended):

The International Business Gateway is a key location to attract international markets and secure appropriate business led mixed use development.

6. Table 6 – Chesser Avenue Local Centre

Extend the area of the local centre as shown on the proposals map to include the open space area and the new retail development now under construction, the latter in accordance with the layout plans for the relevant proposed retail developments as submitted following the further information request, all as shown on the map submitted with the representation.

7. Table 6 – Mayfield Road and Buckstone Terrace

Designate new local centres on the proposals map to include the parades of shops at 55 to 69 Mayfield Road and 2 to16 Buckstone Terrace, and add these to Table 6 (5).

8. Table 6 – Oxgangs Local Centre

Extend the area of the local centre as shown on the proposals map to include the public house and library, and the site of St John's Church and the former Social Work Centre, the latter in accordance with the layout plan for the proposed supermarket for which the council is minded to grant planning permission.

9. Appendix B – Local Centres:

Amend the addresses under the Chesser Avenue and Oxgangs Local Centres to include the addresses of the extensions proposed, and omit the word "Broadway" from the title of the Oxgangs Local Centre.

Amend the addresses under Marchmont South to: 126 to146 Marchmont Road.

Issue 5	**Housing and Community Facilities General**	
Development plan reference:	**Part 3 Section 2 pages 20 - 28**	**Reporter:** Allison Coard

Body or person(s) submitting a representation raising the issue (including reference number):

0132	Leith Central Community Council	2272	Lord Dalmeny
0244	Tony Gray	2274	CALA Management
0278	Richard Owen	2275	Murray Estates
0360	Grahame Whitehead	2276	Gladman Developments Ltd
0364	Craigleith/Blackhall Community Council	2277	Hallam Land Management Ltd
		2278	Stewart Milne Homes
0624	South West (Edinburgh) Communities Forum	2279	Hallam Land Management Ltd
		2280	Mr and Mrs Philip and Barratt David Wilson Homes
0649	Helen Campbell		
0652	Margaret Collins	2281	Wallace Land Investment and Management
0698	David Wilson Homes and J & J Muir	2290	Edinburgh Developers' Group (Edinburgh Chamber of Commerce)
0749	Cramond and Harthill Estate		
0755	BDW Trading Ltd		
0799	NHS Lothian Public Health & Health Policy	2291	Defence Infrastructure Organisation
1124	Liberton Association	2297	Friends of Craighouse
1133	Danzan 2003 Trust	2354	Grange/Prestonfield Community Council
1154	CALA Management Ltd		
1159	New Ingliston Limited	2408	HolderPlanning
1170	A J C Clark	2416	Miller Homes Ltd
1202	Land Options East	2421	SEEDco
1726	Marchmont & Sciennes Community Council	2497	Grosvenor
		2534	Pam Barnes
2086	Persimmon Homes East Scotland	2582	Sergey Gorobets
		2641	Victoria Rogacheva
2088	Scottish Government	2648	Mike Crockart MP
2126	Cockburn Association	2684	Homes for Scotland
2189	Currie Community Council	2688	Spokes
2251	Taylor Wimpey	2703	Ogilvie Homes
2265	Springfield Properties	2709	Scottish Property Federation

Provision of the development plan to which the issue relates:	This section of the Plan details the housing requirement and how this will be met. It identifies housing and school proposals and the approach to healthcare provision.

Planning authority's summary of the representation(s):

CONTEXT

Chapter 3 of the Main Issues Report identified the Proposed SDP context in which the Plan could identify land for housing and sought opinion on which sites to allocate. The first Proposed LDP provided a generous supply of housing land prepared on the basis of

the Proposed SDP, with an awareness that the SDP examination might increase housing land requirements. Changes to the housing land context in the approved SDP and its Supplementary Guidance led to the preparation of the Second Proposed Plan.

GENERAL

- Welcomes the positive improvement in short-term numbers in housing supply. Believe that the provision of sufficient housing across all tenures is crucial to a healthy, prosperous and sustainable city and an important aspect of a thriving economy. As well as delivering accommodation for employees and communities a thriving residential sector supports a range of trades and professions. Single greatest problem is lack of supply. Private Rented Sector could make a significant difference to the number of new homes provided in Scotland. May be benefit in considering private rented sector as a distinct planning use. In the short-term however, in order to attract investment and confidence in the sector, some flexibility in the planning field will be necessary. **(2709 Scottish Property Federation)**
- The Plan should recognise the potential of the emerging Build-to-Rent sector to help increase housing supply and identify that the private rented sector can help to deliver high density, high quality new homes in more central areas and contribute to the creation of successful and sustainable places. The private rented sector should be recognised as a distinct form of new residential development which may need to be treated differently from other forms of residential development. Recognising the emerging build-to-rent market would be in line with Scottish Planning Policy which provides encouragement to a range of housing types, across all tenures. **(2497 Grosvenor)**
- The Royal Victoria Hospital site is the last major site in Craigleith/Blackhall area available for development. NHS is preparing proposals for reuse. Potential reuse of the site should be addressed in the Plan taking account of the development brief under preparation. **(0364 Craigleith/Blackhall Community Council)**
- The Plan hardly mentions residents and does not mention population need which varies across the city. The Plan should acknowledge that the quality of the environment is worse in deprived communities and develop policies to address this. Gives example of prioritising improvements in deprived areas and ensuring high standard development. **(0799 NHS Lothian Public Health & Health Policy)**
- Map showing additional housing sites outwith the urban area suggested by developers was part of consultation process, as the plan has been published it would need to be re-issued to include sites if they were considered to be part of the Plan. Representations on these sites should not be considered as there is no opportunity for public comment and they have already been considered for inclusion. **(0278 Richard Owen)**
- Questions what account has been taken of current planning approvals in the Currie area in the assessment of housing numbers. Not possible to make judgement on new proposals without knowledge of other proposals and information should be included in the Plan. **(0278 Richard Owen)**
- There is discrepancy between text of design briefs. Briefs for West Edinburgh and South East Edinburgh include text referring to infrastructure contributions on the Action Programme. It is unclear why others do not contain this reference and it would be good to have text included consistently. **(0799 NHS Lothian Public Health & Health Policy)**
- Glossary definition of effective land relates to the full plan period and should be

changed to relate to that within Scottish Planning Policy which refers to the 5-year effective housing land supply. **(2684 Homes for Scotland)**

- Do not consider that relevant information has been provided in relation to the size of West Edinburgh SDA, other housing sites outwith the urban area suggested by developers and Capital Coalition Motion of 19 June 2014 to reassess East of Milburn Tower. **(2189 Currie Community Council)**

HOUSING LAND

Housing Land Supply Target

- Difficult to support statements in the Plan for more housing land. Promotion of growth is of concern. Important to indicate how estimates and projections are calculated. Do not consider housing need and demand assessment (HNDA) process to be robust and credible. Increase in single person households reinforces case for high density which is more appropriate for brownfield sites. Office land could be better used for housing. **(2126 Cockburn Association)**
- Unconvinced that the statistics for housebuilding prepared by the Scottish Government are reliable. Housing demand must be generated from population statistics not notional housing demand. Projections in past have not been fulfilled so estimates based on an end date of 2032 are unrealistic and will lead to blight. Approach should be made to Scottish Government to provide full justification and base housing estimations on a 5 year and 10 year period. **(0624 South West (Edinburgh) Communities Forum, 2189 Currie Community Council)**
- There seems to be discord between the housing supply target to 2024 and the national Records of Scotland household projection to 2024. **(0799 NHS Lothian Public Health & Health Policy)**
- An explanation should be given for the addition of 10% to the housing requirement. **(1133 Danzan 2003 Trust; 2251 Taylor Wimpey; 2265 Springfield Properties; 2272 Lord Dalmeny; 2275 Murray Estates; 2276 Gladman Developments Ltd; 2277 Hallam Land Management Ltd; 2278 Stewart Milne Homes; 2408 HolderPlanning; 2416 Miller Homes Ltd; 2421 SEEDco; 2684 Homes for Scotland)**
- Method of setting land supply target inappropriate and insufficient and does not comply with Scottish Planning Policy. No explanation is given for 10% generosity margin and consider that this should be 20% to reflect Edinburgh's local circumstances. **(0749 Cramond and Harthill Estate; 1159 New Ingliston; 1202 Land Options East)**
- Generosity margin should be increased to 20% if 10% cannot be justified. **(2684 Homes for Scotland)**
- Does not consider the 10% addition for generosity to be justified. SDP figures show an 8% overprovision in its area and this is regarded as generous and therefore a further landbank for housing cannot be justified. **(0624 South West (Edinburgh) Communities Forum; 2189 Currie Community Council)**
- Expect generosity margin to be 20%. **(2086 Persimmon Homes East Scotland)**
- No detail of how much of the city's housing demand will be met in the wider city region, which deprivers neighbouring authorities of clear parameters when preparing local development plans. **(2684 Homes for Scotland)**
- To allow readers to assess if increase in activity in 2014-19 is credible, the table at paragraph 62 should be split to show housing requirement as follows: 2009-2013-5,642 units, 2014-2019-16,658 units and 2019-24 - 7,210 units. **(0360 Grahame**

Whitehead)

Greenfield/brownfield

- The Plan recognises that Edinburgh is a growing city and needs a significant amount of new housing to meet the housing land supply target and maintain a mandatory 5 year effective housing land supply. Fully support the release of additional housing sites specifically HSG 20 Cammo. In identifying sites which can contribute to the effective 5 year housing land supply, the Council are correct in identifying sites which 'provide(s) for a range of housing needs, meets climate change and sustainable development objectives and is of a high quality in terms of site layout and design.' Critically important therefore that it is only those sites which are included in the Plan and have been subject to full assessment or formal representation are approved for development purposes at this time. Sites which are allocated in the Plan have been subject to a significant degree of investigatory work to ensure their effectiveness and delivery which should ensure that the time-scales in the Plan are met. **(0749 Cramond and Harthill Estates)**
- Support the approach in paragraph 63, pages 20-21, in meeting the housing requirement, namely 'brownfield sites first'. However the Plan does not set out any practical measures to ensure this aim is met. Welcome the decision of the 19th June 2014 Planning Committee under Point 9 'to explore the prioritisation of building houses on brownfield sites' etc, and urge that this be vigorously pursued in order to protect Edinburgh's green belt and open spaces, with, if necessary, pressure for effective legislation. **(2354 Grange/Prestonfield Community Council)**
- Concerned about amount of greenfield and green belt land release when brownfield is available. Identify substantial implications for transport, car use, the environment and cycling. Appropriate measures should be put in place to ensure developers are encouraged to develop brownfield land before greenfield and housing policy should be decided on a local rather than national basis. **(2688 Spokes)**
- More brownfield sites should be considered within the central city area rather than expanding into green belt. A study within the Leith Central Community Council area suggests that potential brownfield sites have been overlooked in the Housing Land Study. Sites at Powderhall, Gibson Street, further sites in West Bowling Street/South Fort Street and under utilised industrial sites including John Lewis warehousing, B&Q depot, J Smart & Co Redbraes Place and St Clair Street warehousing are identified. Estimate that an additional 10Ha of potential housing land could be available within the period 2015-2020 and with a housing density of 100 units/ha this would contribute 1,000 units. Consider that more work is needed to identify potential brownfield sites before allocating greenfield sites. **(0132 Leith Central Community Council)**
- Urge the Council to incentivise brownfield sites. There is a lack of information about brownfield sites. A halt needs to be made to further outward encroachment and attention focussed on the increasingly large brownfield reservoir. More dense development would use up less land and provide smaller more affordable housing. Traffic impact could be minimised by utilising brownfield sites nearer the city centre. Unclear why demolitions have been deducted from total supply target. Many communities do not want to grow larger. Policies should be produced to ensure communities can accommodate a broader range of houses. **(0624 South West (Edinburgh) Communities Forum; 2189 Currie Community Council)**
- The Scottish Government housing numbers are artificially high and not realistically

achievable. There is no mechanism in the Plan to ensure brownfield development. The Plan, by removing green belt and building low density suburban houses does not address the problem of housing shortage. Council and Scottish Government should drive development of brownfield sites and create more by buying industrial sites and turning them into residential areas. Does not believe that for the city to grow requires expansion into the green belt. **(2582 Sergey Gorobets; 2641 Victoria Rogacheva)**

- Consider the allocation of greenfield sites to be excessive and if not reduced will leave brownfield sites derelict causing economic, environmental and social harm. Allocation provides more than is needed for commercial housebuilding plans and estimates of housing need are in no way credible. **(2297 Friends of Craighouse)**
- Estimates of housing need are not credible. If a stand is not taken against greenfield sites then brownfield sites will never be developed. There are many brownfield sites in the city and this is where housing is needed. **(2534 Pam Barnes)**
- Given the long timescale of the Plan it will be important to keep under review options for growth and housing and consequences for the environment and quality of life. Consider that inference that Edinburgh can only grow its economy by consuming more land is unproven. **(2126 Cockburn Association)**
- Housing numbers are speculative and unrealistic and the method of calculation open to interpretation. Unclear why demolitions represent a reduction in land supply targets. Rate of release of land should reflect industry ability to deliver. Brownfield land should be used first and there is no point releasing more land when sufficient is available to build on at a rate the industry is capable of. Land should not be allocated without ensuring facilities are available within walking distance. Financial incentives needed to encourage brownfield development. Refers to SDP consultative draft Housing Need and Demand Assessment 2, June 2014 and believes that the Local Development Plan should be put on hold until revised housing estimates are produced by SESplan. Considers that SDP Supplementary Guidance sets a reduced housing requirement for Edinburgh from that set out in the SDP HNDA and would expect that less land would be needed, therefore questions why the updated SDP spatial strategy assessment (Table 8.19 of SESPlan Technical Note May 2014) identifies Area 11- South West Edinburgh as an area suitable for development. Requests that this area should be reinstated as an area unsuitable for development. Support increased densities referred to in paragraph 12. Does not agree that Edinburgh is a compact city. **(1170 A J C Clark)**

<u>Meeting the Housing Land Supply Target</u>

- Support plan regarding housing in South East Edinburgh. Clear that sites chosen will provide number of houses to meet requirement without incursion into the Green Belt in the Liberton area. **(0652 Margaret Collins; 0649 Helen Campbell)**
- The Plan is not consistent with the SDP or its Supplementary Guidance, nor Scottish Planning Policy in respect to meeting housing land requirements. Supplementary Guidance sets out how much of the SDP housing requirement should be met within the periods 2009-2019 and 2019-2024. There is no basis to combine the two time periods. **(0749 Cramond and Harthill Estate; 0755 BDW Trading Ltd; 1133 Danzan 2003 Trust; 1154 CALA Management Ltd; 2251 Taylor Wimpey; 2265 Springfield Properties; 2272 Lord Dalmeny; 2274 CALA Management; 2275 Murray Estates; 2278 Stewart Milne Homes; 2408**

HolderPlanning; 2416 Miller Homes Ltd; 2421 SEEDco; 2276 Gladman Developments Ltd; 2277 Hallam Land Management Ltd; 2279 Hallam Land Management Ltd; 2280 Mr and Mrs Philip and Barratt David Wilson Homes; 2281 Wallace Land Investment and Management; 2291 Defence Infrastructure Organisation; 2684 Homes for Scotland)

- The statement at paragraph 63 'The LDP allocates sufficient land capable of becoming effective and delivering the scale of housing requirements for the periods 2009-2019 and 2019-2014' is incorrect and there is insufficient information in the Plan or background documents to verify this. **(1133 Danzan 2003 Trust; 2251 Taylor Wimpey; 2265 Springfield Properties; 2272 Lord Dalmeny; 2275 Murray Estates; 2277 Hallam Land Management Ltd; 2278 Stewart Milne Homes; 2276 Gladman Developments Ltd; 2408 HolderPlanning; 2416 Miller Homes Ltd; 2421 SEEDco; 2279 Hallam Land Management Ltd; 2684 Homes for Scotland)**
- A recent appeal decision confirms that the requirement should be met for each of the two periods. Bringing together these requirements has the effect of constraining the delivery of housing by not providing enough land in the first period to allow the housing requirement to be met. A supply of housing is identified which is not all deliverable within the periods 2009-2019 and 2019-24.

The methodology for calculating windfall does not comply with Scottish Planning Policy. It is unlikely that constrained sites will deliver the number of homes stated and a robust explanation should be provided. No account is taken of delivery timescales of new LDP allocations.

Corrections of errors in methodology used to establish how the housing requirements is achieved by the Plan as set out in Figure 7 show that in the period 2009-2019 there is a shortfall of 8,752 homes likely to be delivered by the Plan. In the period 2019-2024 there will be a surplus of 6,390 houses however this will be partly making up the deficit in the first period and by the end of 2024 there will continue to be a deficit of 2,362 houses. Shortfalls are likely to be greater given the optimistic assumptions made in respect of delivery from windfall and constrained sites.

A comparison of programming of current and proposed housing supply arising from the Plan and the Plan housing target demonstrates that at no point in time will the housing supply be sufficient to meet the housing target and at no point in time will there be a 5-year supply of housing. **(1133 Danzan 2003 Trust; 2251 Taylor Wimpey; 2265 Springfield Properties; 2275 Murray Estates; 2278 Stewart Milne Homes; 2408 HolderPlanning; 2416 Miller Homes Ltd; 2421 SEEDco)**

- Ability for pre-2019 housing requirement to be met is challenged. Strategic requirement for 2009-2019 is 20,300. There have been 5,642 completions in the period 2009-2013 resulting in a net requirement for 16,658 units in the period 2013-19. Based upon the agreed Housing Land Audit 2013 there is a shortfall of 44% of the requirement. **(0755 BDW Trading Ltd; 2274 CALA Management; 2280 Mr and Mrs Philip and Barratt David Wilson Homes)**
- Addition of 3,777 units to the supply by increasing capacities and introducing new sites appears to address a significant element of Edinburgh's housing land shortfall however the programming requires closer scrutiny. Consider that the programming of sites is optimistic and provide revised figures. Based upon revised figures, sites added in the Second Proposed Plan will only contribute around 600 extra units pre-2019 to the existing programmed supply. Edinburgh will fail to meet 2009-2019 targets with a shortfall of 30% not including flexibility

allowance. In the period 2019-2024 the additional Second Proposed Plan sites would contribute 2,000 units. To meet the target of 8,484 units in the period 2009-2024 sites within the first Proposed Plan require to contribute just under 6,500 units. Utilising the 2013 Housing Land Audit programming and rolling forward to 2024 sites from the first Proposed Plan would contribute 4,268 units. The overall contribution from all new LDP sites will therefore amount to 6,300 which will result in a shortfall for the period 2009-2024 of over 2,000 units. **(0755 BDW Trading Ltd; 2280 Mr and Mrs Philip and Barratt David Wilson Homes)**

- Consider housing allocations to be insufficient to meet requirements, particularly in the period to 2019 and should concentrate on sites which can deliver early, especially small sites. **(1154 CALA Management Ltd)**
- Concerned about methodology for windfall and consider this should be revised downwards. Allocations considered to be too tight if housing land supply target to be reached. Allocating a few additional sites would improve the flexibility of the Plan which would be consistent with Scottish Planning Policy. **(1159 New Ingliston)**
- It has been made clear in a recent appeal decision that amalgamating the requirement over the two periods is contrary to SDP Policy 5. Express surprise at level of windfall development and suggest a further allowance is made for demolitions to allow for flexibility and some small scale demolitions. Not convinced that increased allocations for first Proposed Plan sites will necessarily result in increased short term completions. A revised Figure 7 shows a significant shortfall of approximately 7,600 houses in the 2009-19 period of the plan which must be addressed through additional allocations. **(2272 Lord Dalmeny; 2277 Hallam Land Management Ltd)**
- Windfall should not be included within existing sources as this is contrary to PAN 2/2010. Plan cannot be capable of providing a five year supply of effective housing land at the point of adoption as windfall programmed to come forwards throughout the plan period and are being relied upon for a substantial proportion of the housing land requirement. Housing Land Study should split requirements and calculation of five year requirement should be based on the two separate periods. This would show a five year requirement loaded towards the early part of the Plan. As no delivery timescales are set out for new allocations it is not possible to identify if a five year supply of effective housing land is being maintained. **(2276 Gladman Developments Ltd)**
- Further detail should be provided to explain how effective supply and constrained sites coming forward have been calculated. Consider that it is not possible to calculate the five year effective land supply. Dispute the reliability of expected completions 2020-2024. **(2279 Hallam Land Management Ltd)**
- Consider that it is not possible to calculate the five year effective land supply nor possible to confirm if requirement for each period can be met as there is no data to identify annual expected completions from all proposed housing allocations. No methodology for calculating five year effective land supply requirements are set out. The Housing Land Audit 2013 does not provide a robust basis to calculate effective supply as not all proposed allocations are included. Analysis provided indicates a shortfall in effective land supply and consider that there is a need to allocate further sites. **(2291 Defence Infrastructure Organisation)**
- Consider that insufficient land has been allocated to meet requirement to 2019. Including constrained sites is contrary to the Housing Land Audit 2013 and there is no evidence to contradict this. Windfall from brownfield calculation is unfounded. Expectation that all new allocations will be built by 2024 is unfounded and lower

capacities should be assumed. Modifying Table 7 to address shortcomings results in a requirement to allocate 8,367 homes before 2019. An overprovision of homes in the period 2019-2024 arises due to assumptions that completions from windfall are split and would reduce as windfall sites are approved and built in the period to 2019. To ensure maximum flexibility and a generous supply of housing land the lower capacity figure should be used to calculate capacity of allocated sites. The strategy set out will not maintain a five year effective land supply. **(2281 Wallace Land Investment and Management)**

- Housing numbers could be increased in line with greater confidence in the housing and other economic market sectors. A bolder upper limit would be appropriate. Some sites claimed to be effective will need to be monitored for viability and likely take up. **(2290 Edinburgh Developers' Group (Edinburgh Chamber of Commerce))**
- Consider basis for calculation of housing supply to be flawed in principle and significantly over-optimistic. Inadequate provision is made for new homes. Plan fails to conform with Scottish Planning Policy as it does not provide compelling evidence for the housing supply target, does not consider past completion rates and anticipated trends in calculating windfall, assumes a high level of constrained sites will come forward, does not allocate an ambitious enough number or range of sites and does not provide justification for 10% generosity factor. Consider it unrealistic that the Plan will deliver sufficient housing to maintain a five year effective supply as the Plan relies on significant delivery of constrained brownfield sites and does not allocate the types of sites which the housebuilding industry is able to deliver.

New allocations are over ambitious and 6,123 homes would be more realistic expectation. Consider there will be a shortfall of 8,367 homes in the period to 2019 and 6,521 over the full plan period. **(2684 Homes for Scotland)**

- To ensure maximum flexibility and a generous supply of housing land the lower capacity figure should be used to calculate capacity of allocated sites. This would require additional units to be allocated in the Plan. **(1202 Land Options East)**
- Consider that it is necessary to over allocate land beyond minimum supply requirements to address failure to meet ongoing land supply requirements and that land at Ratho would make a contribution to meeting the wider housing need in the area and reducing the housing completions deficit. **(0698 David Wilson Homes and J & J Muir)**
- Limited progress in delivering housing in the core development areas indicates urgency to concentrate on small sites outwith Strategic Development Areas. Scottish Planning Policy implies that a range and choice of housing, including sites at the top of the market are a priority consideration when examining the housing land supply and no sites are included in the Plan that provide choice for those wishing to purchase at the high end of the housing market. Further small scale sites are required, particularly in the north west of the city. **(1154 CALA Management Ltd)**
- Query elements of Table 7. Consider new brownfield allocation to be low and requests an explanation and does not understand why demolitions should be deducted from housing land requirements. **(2126 Cockburn Association)**
- Assumption that 16% (5200 units) of all completions will come from windfall sites is an unrealistic figure. The adopted SDP windfall figure of 4,159 is accepted as realistic. Large gap between estimated deliveries and requirement for 5,200 units in 5 years. **(2086 Persimmon Homes East Scotland)**

- Significant misgivings about housing land provisions set out. Consider plan lacks desire to create conditions to grow and prosper. Effective five year land supply must be available at all times, not just in a thriving economy. **(2703 Ogilvie Homes)**
- Five year housing supply should be 2,453 new units per annum in the period 2009-2019 and an additional 1,586 units per annum in the period 2019-2024. Plan runs contrary to reporters' recommendations in the Examination of the SDP. It is no longer the case that low rates of housebuilding are almost entirely due to a lack of credit facilities. Approach ignores fact that even before the economic downturn Edinburgh did not have an effective 5 year housing land supply. Fundamental reason for lack of housebuilding in Edinburgh has been lack of supply of land in places where people want to live, developers can build and which provide a range of house types and sizes. If demand cannot be met it will result in more commuting. To meet shortfall consents should be granted on allocated sites prior to the adoption of the Plan. Likely that forecasts and requirements will be out of date before the Plan is adopted. **(0749 Cramond and Harthill Estate)**
- Figure 7 shows South East Edinburgh is expected to supply 37% of the SDP allocations which is disproportionately high in an area that has already lost a lot of open space and green belt to housing development. Even using the middle point of the proposed numbers in Table 4, the figure of 3518 is considerably in excess of the 3155 proposed for this area in Figure 7. Even without the inclusion of windfall sites, it is clear that housing needs in South East Edinburgh can be met and exceeded without further reduction of the green belt. **(1124 Liberton Association)**

<u>5-year Effective Housing Land Supply</u>

- Unclear whether Edinburgh has an effective five year land supply from the information presented. **(2088 Scottish Government)**
- Scottish Ministers modifications to SDP Supplementary Guidance on Housing Land require the 5 year effective land supply requirements to be based upon the 2009-19 requirement. The correct figure should be 13,880. Based upon the agreed 2013 Housing Land Audit there is a shortfall of 44%. **(0755 BDW Trading Ltd; 2274 CALA Management; 2280 Mr and Mrs Philip and Barratt David Wilson Homes)**
- No methodology is set out for calculating five year effective land supply requirements. In particular the 5 year housing supply target. Recommends that methodology set out in 'Dunbar appeal decision' is utilised to calculate the 5 year housing supply target. Consider that 2013 Housing Land Audit does not provide robust basis on which to quantify 5 year effective land supply. **(2279 Hallam Land Management Ltd)**
- The restrictive policy position on greenfield land could hamper ability to maintain a five year effective land supply. An explanation of the method of calculating the five year housing supply target should be provided. **(2684 Homes for Scotland)**

<u>Housing Land Study</u>

- Within the ratified modification to SDP Supplementary Guidance, the Council are now obliged to meet the housing requirements of both the 2009-19 and 2019-24 periods in full. **(0755 BDW Trading Ltd)**
- Housing Land Study should include an appendix listing all proposed allocations,

annual expected completions and how they would achieve the housing requirement for each period. Dispute the reliability of expected completions 2020-2024. **(2279 Hallam Land Management Ltd)**

- Outcomes of Housing Land Study are inconsistent with SDP as they bring together requirements into one period. Study should be focussed on split requirements. Five year requirement should be based on two separate periods. No delivery timescales are set out for delivery of new site allocations therefore it is not possible to identify if a five year supply is being maintained. **(2276 Gladman Developments Ltd)**

COMMUNITY FACILITIES

- The pressure on primary school places in south Edinburgh is well documented and has already led to expansion of James Gillespie's Primary. An additional safeguard should be made for a new primary school in the current Astley Ainslie Hospital site. **(1726 Marchmont & Sciennes Community Council)**
- Acknowledge that International Business Gateway can support a possible primary school if required to serve additional housing there (subject of a representation dealt with under Issue 20). **(1159 New Ingliston Limited)**
- Concerned about the number of houses proposed to the west of Edinburgh. Questions if 2 new primary schools in West Edinburgh are sufficient and asks what plans have been made for secondary school provision. Questions what plans have been made for healthcare, greenspace, shopping areas, local businesses, cumulative effect of traffic, noise and air pollution and improvements to public transport. **(2648 Mike Crockart MP)**
- Concerned that there appears to be no appraisal of impact on community services. Refers to Policy Hou 10 which states that planning permission will only be granted where there are associated proposals to provide any necessary health and other community facilities. Considers that any required infrastructure or developer contribution to support Policy Hou 10 should be included in development principles of site briefs. Express specific concerns that HSG 21 and HSG 22 will have significant impact on local medical facilities. **(0244 Tony Gray)**

Modifications sought by those submitting representations:

GENERAL

- Add a new paragraph within paragraphs 60-70 to recognise the potential of the emerging Build-to-Rent sector to help increase the housing supply and identify that it can help deliver high density, high quality new homes in more central areas and contribute to the creation of successful and sustainable places. The private rented sector should also be recognised as a distinct form of new residential development which may need to be treated differently from other forms of residential development. **(2497 Grosvenor)**
- Provide guidance on the redevelopment of Royal Victoria Hospital. **(0364 Craigleith/Blackhall Community Council)**
- Acknowledge that quality of place is poorer in deprived communities and develop policies to address this. **(0799 NHS Lothian Public Health & Health Policy)**
- Include major brownfield sites in the Spatial Strategy Summary Map (Page 6) and a chart or table summarising approved but not built housing proposals by area. **(0278 Richard Owen)**

- Either include a map showing additional housing sites within the urban area suggested by developers in the Plan or this should not form part of the Plan. **(0278 Richard Owen)**
- Identify all sites within the urban area where housing development will be supported on Proposals Map. **(1154 CALA Management Ltd)**
- Text of development briefs should be consistent to include 'All proposals will be required to make appropriate contributions to new and improved infrastructure as specified in the Action Programme'. **(0799 NHS Lothian Public Health & Health Policy)**
- Amend glossary definition of effective housing land supply to that of Scottish Planning Policy 'The part of the established housing land supply which is free or expected to be free of development constraints in the period under consideration and will therefore be available for the construction of housing'. **(2684 Homes for Scotland)**
- No specific modification sought **(2189 Currie Community Council)**

HOUSING LAND

Housing Land Supply Target

- Address apparent discord between housing supply target and household projections. **(0799 NHS Lothian Public Health & Health Policy)**
- Justify 10% addition to housing land requirement. **(1133 Danzan 2003 Trust ; 2251 Taylor Wimpey; 2265 Springfield Properties; 2272 Lord Dalmeny; 2275 Murray Estates; 2276 Gladman Developments Ltd; 2277 Hallam Land Management Ltd; 2278 Stewart Milne Homes; 2408 HolderPlanning; 2416 Miller Homes Ltd; 2421 SEEDco; 2684 Homes for Scotland)**
- Increase generosity factor to 20%. **(0749 Cramond and Harthill Estates; 1159 New Ingliston Limited; 1202 Land Options East)**
- Increase generosity margin to 20% or justify lower margin. **(2684 Homes for Scotland)**
- Allocate sites to allow for a total of 5,000 additional units to meet with the Scottish Planning Policy requirement for 20% above housing requirement, and taking unto account the significant differences in targets, including windfall and constrained sites coming forward. **(2086 Persimmon Homes East Scotland)**
- Provide information on extent of Edinburgh's housing to be met by wider region. **(2684 Homes for Scotland)**
- Update housing requirement table at paragraph 62 to show 2009-2013 - 5,642 units, 2014-2019-16,658 units and 2019-24 - 7,210 units. **(0360 Grahame Whitehead)**

Greenfield/Brownfield

- Remove greenfield/green belt land from development and focus on re-use of brownfield land. No planning permission should be granted for greenfield land until all available brownfield land has been exhausted. **(2688 Spokes)**
- Requests the consideration of more brownfield sites within central city area as opposed to expansion into green belt. **(0132 Leith Central Community Council)**
- Requests that more attention should be placed on redeveloping inner city brownfield sites where infrastructure is already in place and higher densities are acceptable as opposed to low density outward sprawl on undeveloped land. **(0624**

South West (Edinburgh) Communities Forum; **2189 Currie Community Council)**

- The Plan should be city development not local development. Should be made clear that development needs to be contained within current city limits. Allocations on green belt land should be removed from the Plan. The existing green belt needs to be protected as Open Space. The Plan should focus on developing brownfield and the Council should facilitate this, specifically in relation to the development of industrial areas. The Plan should disclose the developers behind the sites. **(2582 Sergey Gorobets; 2641 Victoria Rogacheva)**
- Remove or reduce greenfield housing allocation. Promote and strengthen brownfield and derelict sites. **(2297 Friends of Craighouse)**
- Should not accept estimates of housing need and should concentrate on brownfield sites. **(2534 Pam Barnes)**
- Reflect concerns about population predictions, housing surplus and need for high density development which is more appropriate on brownfield sites. **(2126 Cockburn Association)**
- Remove references to building on parkland, the countryside and in the green belt. Revise Figure 7, and state how many homes could be built on brownfield sites. **(1170 A J C Clark)**

Meeting the Housing Land Supply Target

- Increase allocation of land to meet ongoing land supply requirements. **(0698 David Wilson Homes and J & J Muir)**
- Allocate additional effective housing sites. Properly reflect SDP and Scottish Planning Policy and provide additional analysis on supply flexibility, windfall and constrained sites. **(1133 Danzan 2003 Trust; 2251 Taylor Wimpey; 2265 Springfield Properties; 2275 Murray Estates; 2278 Stewart Milne Homes; 2408 HolderPlanning; 2416 Miller Homes Ltd; 2421 SEEDco)**
- Amend Figure 7 to reflect supply targets for 2009-19 and 2019-24. **(0749 Cramond and Harthill Estate; 0755 BDW Trading Ltd; 2274 CALA Management; 2280 Mr and Mrs Philip and Barratt David Wilson Homes)**
- Accept that the Plan is not consistent with the SDP in relation to Policy 5. **(1154 CALA Management Ltd)**
- Identify further housing land allocations, recognise contribution of small sites outwith Strategic Development Areas to maintenance of 5 year land supply, accept that additional small scale housing sites are required particularly in the north west of the city and acknowledge plan does not provide a range of sites. **(1154 CALA Management Ltd)**
- Adjust quantitative measures in Table 7 to reflect a stronger housing land supply target, including generous supply, windfall and effective site assessment. Update text to reflect positive economic growth and a stronger housing need target. **(1159 New Ingliston Limited)**
- Reduce capacity of new Plan allocations to 7,250 units. **(1202 Land Options East)**
- No specific modification proposed but query elements of Table 7. **(2126 Cockburn Association)**
- Update Figure 7 as provided to show 2009-19 and 2019-24 periods and update with new sites identified through examination process to meet shortfall:

Figure 7 Housing Land Needed

Setting the LDP Housing Land Supply Target	2009-2019	2019-2024
The City of Edinburgh Council Housing Land Requirement	22,300	7,210
+ 10% to ensure a generous supply	2,230	721
LDP Housing Land Supply Target	**24,530**	**7,931**
Meeting the LDP Housing Land Supply Target		
Effective Supply	7,272	3,703
Constrained Sites Coming Forward	729	3,430
Housing Completions 2009-2013	5,642	-
Windfall	2,000	3,200
Demolitions	- 1,850	- 150
Total Supply from Existing Sources	**13,793**	**10,183**
Target to be met through new LDP allocations	**10,737**	**- 2,252**
New LDP Allocations		
New brownfield allocations	300	515
Sites in West Edinburgh SDA	675	2,125
Sites in South East Edinburgh SDA	1,443	1,833
Sites elsewhere in the City	715	985
Total New LDP Allocations	**3,133**	**5,458**
Remaining Shortfall needing to be addressed	**7,604**	**- 7,710**

(2272 Lord Dalmeny; 2277 Hallam Land Management Ltd)

- Amend Figure 7 to show housing requirement for periods 2009-19 and 2019-24. **(2276 Gladman Developments Ltd)**
- Amend Figure 7 to show 2009-19 and 2019-24 periods. Modify text to explain how requirements will be met for both periods, including 10% generosity. Add footnote to explain how effective supply and constrained sites have been calculated. **(2279 Hallam Land Management Ltd)**
- Delete Figure 7 and replace with alternative table proposed:

Setting the LDP Housing Housing Land Requirement	2009-19	2019-24	2009-2024
The City of Edinburgh Council Housing Supply Target	22,300	7,210	29,510
+ 10% to ensure a generous supply	2,230	721	2,951
LDP Housing Land Requirement	24,530	7,931	32,461
Meeting the LDP Housing Land Rerquirement			
Effective Supply	7,272	3,703	10,975
Constrained Sites coming forward	0	0	0
Housing Completions 2009 - 2013	5,642	0	5,642
Windfall	2,600	2,600	5,200
Demolitions	-2,000	0	-2,000
Total Supply from Existing Sources	**13,514**	**6,303**	**19,817**
LDP Housing Land Requirement	24,530	7,931	32,461
Total Supply from Existing Sources	-13,514	-6,303	-19,817
Target to be met through new LDP allocations	**11,016**	**1,628**	**12,644**
New LDP Allocations	**2009-19**	**2019-24**	**2009-2024**
New Allocations in Second Proposed Plan	7,531		7,531
Programming of New Allocations	2,649	3,474	6,123
Further allocations needed to meet housing land requirement in full	**8,367**	**-1,846**	**6,521**

(2281 Wallace Land Investment and Management)

- Figure 7 housing numbers could be increased. **(2290 Edinburgh Developers' Group (Edinburgh Chamber of Commerce))**
- Replace Figure 7 with new table showing supply calculations for 2009-2019 and 2019-24. Fully revise housing land requirement calculations to include revision of assumption that any units will come forward on constrained sites, reviewing the number of units assumed to come from windfall sites discounting any that have permission for non-housing uses or no planning status to support assumptions and revising assumed yield from new allocations to reflect up to date programming information. Allocate sufficient effective sites to meet need and demand in full, including 2009-2019. Sites should include a range that is viable and attractive to the market and include an improved supply of greenfield sites in marketable areas. Add table to show that the Plan allocates sufficient land for the period 2009-2019. **(2684 Homes for Scotland)**
- Allocate sites at Duddingston Golf Course to ensure that a generous 5 year supply of effective housing land can be maintained at all times. **(2703 Ogilvie Homes)**
- Allocate an additional 1,100 units to account for discrepancy in windfall. **(2086 Persimmon Homes East Scotland)**
- Allocate additional site (Craigiehall) to meet anticipated housing growth requirements and contribute towards maintaining a 5-year land supply. **(2291 Defence Infrastructure Organisation)**
- Requests a guarantee that the generous supply of land will not make provision for large numbers of housing, in excess of need, with a more robust commitment to using brownfield sites and a clear indication of how windfall sites are incorporated into the overall figures. **(1124 Liberton Association)**

<u>5-year effective Land Supply</u>

- Seek clarification on pages 20-21 that a 5 year effective housing land supply is provided. **(2088 Scottish Government)**
- Modify paragraph 64 to set out methodology used to calculate the 5 year housing supply target and explain how target relates to 2019 and 2024 requirements. Recommends a methodology set out in Dunbar appeal decision: (Housing land requirement (taken from the housing need and demand assessment 2009-2019) – Completions) X 5/Years left to run) = the required 5 year land supply. **(2279 Hallam Land Management Ltd)**
- Within paragraph 64 amend 5 year housing supply target for Edinburgh to 13,880. Amend additional homes each year to 2,776. **(0755 BDW Trading Ltd; 2274 CALA Management; 2280 Mr and Mrs Philip and Barratt David Wilson Homes)**
- Remove last sentence of paragraph 67 'Apart from sites identified for development in this plan to deliver the planned growth of the city, housing on greenfield land is unlikely to be supported' and clarify method of calculating 5 year housing supply target. **(2684 Homes for Scotland)**

<u>Housing Land Study</u>

- Remove sentences from Housing Land Study: 'the Council sees no merit in introducing artificial phasing constraints on the release of LDP housing sites – the LDP therefore brings together the requirements for 2009-2019 and 2019-24 into one requirement of 29,510 for 2009-24' and 'the SDP Supplementary Guidance

indicates that member authorities will base their calculation of the five year land supply for house building on the period 2009-2024...' **(0755 BDW Trading Ltd)**

- Include an Appendix within the Housing Land Study listing all proposed allocations, annual expected completions and how they would achieve the housing requirement for each period. **(2279 Hallam Land Management Ltd)**
- Re-write Housing Land Study to comply with duty to ensure the Plan is consistent with the SDP. **(2276 Gladman Developments)**

COMMUNITY FACILITIES

- Provide estimate of pupils from International Business Gateway proposal and include requirements in Table 5. **(1159 New Ingliston Limited)**
- Additional safeguard for new primary school for south Edinburgh at proposed site in current Astley Ainslie Hospital site. **(1726 Marchmont & Sciennes Community Council)**
- Complete review taking in all 12 sites (HSG 1-6, HSG 7, HSG 19-20, HSG 32, HSG 33 and HSG 34) to carry out a survey of infrastructure requirements. **(2648 Mike Crockart MP)**
- Undertake a community facilities appraisal for each housing proposal and include in site brief development principles. **(0244 Tony Gray)**

Summary of responses (including reasons) by planning authority:

GENERAL

- It is not considered necessary to provide specific reference or policy support for the build to rent sector. The Plan makes provision to meet a range of housing needs. Policy Hou 1 supports housing development of all tenures. No modifications proposed. **(2497 Grosvenor)**
- Discussions are at an advanced pre-application stage to redevelop the Royal Victoria Hospital site. The submitted application will be assessed using the policies of the Plan. It is not considered necessary to include specific guidance for this site. No modification proposed. **(0364 Craigleith/Blackhall Community Council)**
- Helping to create strong, sustainable communities, enabling all residents to enjoy a high quality of life is a key aim of the Plan. Part 1 Section 2- Creating Successful Places sets out that good design can help achieve a wide range of social, economic and environmental goals, creating places that are successful and sustainable. Policies are set out which aim to raise design quality and create successful places across the city. Housing proposals identified at Table 3 include regeneration sites. Greenspace proposal are identified which will bring benefits to existing communities. No modifications proposed. **(0799 NHS Lothian Public Health & Health Policy)**
- No modification proposed, however the Council seeks merit in this representation. For consistency with West Edinburgh and South East Edinburgh a new sentence could be added at the end of paragraph 119: 'All proposals will be required to make appropriate contributions to new and improved infrastructure as specified in the Action Programme'. **(0799 NHS Lothian Public Health & Health Policy)**
- A map (Map of Suggested Sites) showing additional housing sites outwith the urban area suggested by developers at the first Proposed Plan stage was made available by the Council for information only along with a summary of

representations. Views were not sought on the suggested sites at that stage. All representations promoting land for housing as illustrated in the map have been assessed and the assessment is set out in the Environmental Report Second Revision, Volume 2, June 2014. The Plan includes sites which were assessed as suitable for housing development. Those sites not identified as suitable have not been included in the Plan and do not form part of the Plan. No modifications proposed. **(0278 Richard Owen; 2189 Currie Community Council)**

- The Environmental Report Second Edition June 2014, Volume 2 sets out a housing assessment for each of the sites included within the Plan. The infrastructure requirements for sites have been assessed in a Transport Appraisal and Education Infrastructure Appraisal which take account of committed developments. It is not considered to be appropriate to include a table or map within the Plan which identities all sites which have planning consent for housing. The annual Housing Land Audit includes detail of such sites and is publicly available. No modification proposed. **(0278 Richard Owen)**
- The definition of effective housing land supply set out in the Plan's Glossary is as set out by the Glossary in Scottish Planning Policy: 'The part of the established housing land supply which is free or expected to be free of development constraints in the period under consideration and will therefore be available for the construction of housing'. The glossary within the Plan specifies the period under consideration as the period up to 2024 as this is the period of the Plan and therefore the period under consideration. No modification proposed. **(2684 Homes for Scotland)**
- The boundaries of Strategic Development Areas are contained within the Environmental Report Second Revision June 2014, Volume 1, Page 27. They are taken from the SDP Spatial Strategy Assessment Technical Note (2011), also reproduced in the LDP Main Issues Report. The boundaries provided areas of search for housing land. It is not considered necessary to include the boundaries within the LDP. See Issue 1 for other representations on Strategic Development Areas boundaries. No modifications proposed. **(2189 Currie Community Council)**
- The Report to Planning Committee of 14 May 2015 addresses in paragraphs 3.26 – 3.33 the requirements of the Capital Coalition Motion from the Planning Committee meeting of 19 June 2014. It would be inappropriate to make reference to it within the Plan. No modifications proposed. **(2189 Currie Community Council)**

HOUSING LAND

Housing Land Supply Target

- Scottish Planning Policy, paragraph 118 requires that strategic development plans (SDPs) should set out the housing supply target and the housing land requirement for the plan area, each local authority area, and each functional housing market area. They should also state the amount and broad locations of land which should be allocated in local development plans to meet the housing land requirement up to year 12 from the expected year of plan approval, making sure that the requirement for each housing market area is met in full. Paragraph 113 of Scottish Planning Policy states that Housing Need and Demand Assessments provide the evidence base for defining housing supply targets and allocating land for housing in development plans. A Housing Need and Demand Assessment carried out for the SDP area was signed off as robust and credible by the Scottish Government.

No modifications proposed. **(0624 South West (Edinburgh) Communities Forum; 2126 Cockburn Association; 2189 Currie Community Council)**

- Scottish Planning Policy, paragraph 116, requires that housing supply targets should be increased by a margin of 10-20% to establish the housing land requirement, in order to ensure that a generous supply of land for housing is provided. The exact extent of the margin will depend on local circumstances. SDP Supplementary Guidance Housing Land November 2014, Table 3.1 sets for Edinburgh a housing land requirement for 2009-2024 of 29,510 units. Scottish Planning Policy Diagram 1 does not require local development plans to add on a generosity margin to housing land requirements. Nonetheless, a 10% generosity factor has been added to the Edinburgh requirement for the period 2009-2024 of 29,510 to set an overall LDP housing land supply target of 32,460. This adds 2,950 homes to the figure in the SDP Supplementary Guidance, with further generosity provided through the use of capacity ranges for site allocations and in a significant margin of error for the windfall assumption. 10% is considered to provide a generous supply and it is not proposed that this should be increased. Setting a larger margin would not take account of the fact that the SDP requires the LDP to maintain a green belt (Policy 12) and minimise loss of land from the green belt (SDP, paragraph 130). No modifications proposed. **(0624 South West (Edinburgh) Communities Forum; 0749 Cramond and Harthill Estates; 1133 Danzan 2003 Trust; 1159 New Ingliston; 1202 Land Options East; 2086 Persimmon Homes East Scotland; 2189 Currie Community Council; 2251 Taylor Wimpey; 2265 Springfield Properties; 2272 Lord Dalmeny; 2275 Murray Estates; 2276 Gladman Developments Ltd; 2277 Hallam Land Management Ltd; 2278 Stewart Milne Homes; 2408 HolderPlanning; 2416 Miller Homes Ltd; 2421 SEEDco; 2684 Homes for Scotland)**
- The housing supply target is based upon the housing land requirement for Edinburgh set out in SDP Supplementary Guidance Housing Land November 2014 which identifies the requirement across the SDP area. The housing supply target is a policy view of the number of homes that will be delivered by local authority area taking into account wider economic, social and environmental factors, issues of capacity, resource and deliverability. Some of the housing demand generated by the city will be accommodated in the wider city region. It is therefore not expected that the supply target would match the National Records of Scotland Projections. No modifications proposed. **(0799 NHS Lothian Public Health & Health Policy)**
- The approved SDP (paragraph 110) notes that, due to environmental constraints and other restrictions within the Council's boundaries, a significant proportion of housing need and demand generated in Edinburgh will need to be met in the five other LDP areas. SDP technical note (Supplementary Guidance – Housing Land Technical Note, May 2014) sets out the survey and analysis work undertaken. No modification proposed. **(2684 Homes for Scotland)**
- The purpose of the table at paragraph 62 is to provide the housing land requirement for Edinburgh as set out in the SDP Supplementary Guidance Housing Land November 2014. The guidance does not split the requirement into the periods suggested and to do so would be confusing and not serve the purpose for which the table was intended. No modifications proposed. **(0360 Grahame Whitehead)**

<u>Greenfield/brownfield</u>

- The scale of housing land required is set out in the SDP. The LDP is required to

allocate sufficient land capable of becoming effective and delivering the scale of housing requirements to meet this requirement. The SDP (paragraph 113) sets out that priority in allocating new sites for housing development should be given to brownfield sites within existing built up areas. The LDP allocates land in accordance with this requirement. New brownfield allocations are identified in addition to existing proposals on brownfield sites. A housing land study (Housing Land Study, June 2014) has been carried out to identify further brownfield sites with potential for housing development in addition to sites allocated within the Plan. This looked at the amount of land in the main urban areas which has potential for housing development. Based on a number of assumptions, it estimates a capacity sufficient to justify a windfall assumption of 5,200 units over the Plan period. The contribution of these sites to meeting the housing requirement has been taken into account before allocating greenfield sites. The issue of windfall is addressed further in the section below 'meeting the housing land supply target'.

Brownfield sites are insufficient to meet the overall requirement, and it is necessary to release some land from the green belt. The selection of new housing sites has been strongly influenced by environmental considerations, identifying sites that have good levels of public transport accessibility and where new development minimises the impact on the landscape setting of the city. Greenfield land has been assessed using criteria which ensure conformity to the SDP and Scottish Planning Policy. Assessments are set out in the Environmental Report Second Revision June 2014, Volume 2. **(0132 Leith Central Community Council; 0624 South West (Edinburgh) Communities Forum**; **1170 A J C Clark; 2126 Cockburn Association; 2189 Currie Community Council; 2297 Friends of Craighouse; 2534 Pam Barnes; 2582 Sergey Gorobets; 2641 Victoria Rogacheva; 2688 Spokes)**

- The LDP has been prepared to deliver the strategy of the SDP which was approved in June 2013. Supplementary Guidance was adopted in October 2014 and provides the housing land requirement for Edinburgh. There is no need to put a hold on the LDP process. No modification proposed. **(1170 A J C Clark)**
- The developer of a site is not a consideration for the Plan. The annual housing land audit provides this and is available publicly. No modification proposed. **(2582 Sergey Gorobets; 2641 Victoria Rogacheva)**

<u>Meeting the Housing Land Supply Target</u>

- Scottish Ministers approved the SDP in June 2013 and required SESplan to prepare supplementary guidance to distribute an increased overall housing requirement amongst the six Council areas. SDP Policy 5 identifies that, for the period 2009 up to 2024, there is a requirement for sufficient housing land to be allocated so as to enable 107,545 houses to be built across the SDP area. SDP Supplementary Guidance Housing Land, November 2014, page 5 sets out a housing land requirement for Edinburgh for the period 2009-2019 of 22,300 and for the period 2019-2024 of 7,210.

  These requirements are based on assumptions of economic recovery and a significant increase in house-building activity (SDP Supplementary Guidance Housing Land Technical Note May 2014). The LDP aims to provide a flexible approach to meeting housing and supporting housing development. The Council sees no merit in introducing artificial phasing constraints on the release of LDP housing sites. Doing so would be inconsistent with SDP provisions on flexibility (SDP paragraphs 114 - 115). The LDP therefore brings together the requirements

for 2009 - 2019 and 2019 -2024 into one requirement of 29,510 for 2009 -2024.

Figure 7, page 21 sets out how the LDP meets its housing requirement for 2009-2024. It is acknowledged that the terms used within this table do not reflect those used within Scottish Planning Policy Diagram 1 which refers to LDPs meeting the housing land requirement. Figure 7 is supported by the Housing Land Study June 2014 which provides justifications for windfall and demolitions and sets out the contribution of existing effective and constrained sites to meeting the LDP housing land requirement.

Windfall assumption

The Housing Land Study June 2014 provides justification, as required by SDP Policy 5, for assumptions on anticipated completions from windfall sites. Scottish Planning Policy requires that any assessment of the expected contribution to the housing land requirement from windfall sites must be realistic and based on clear evidence of past completions and sound assumptions about likely future trends. In urban areas this should be informed by an urban capacity study. The housing land study assesses the potential for new residential development within the existing built up area of Edinburgh. It is a detailed map-based approach across for the entire urban area which identifies potential new urban area housing land, categorises potential housing land into different levels of development probability and estimates capacity taking account of the SDP's projected housing need and demand. The approach taken to estimate potential is supported by national, strategic and local planning policy. The approach also has regard to the findings of the SDP Examination and Housing Needs and Demand Assessment (2010, revised 2011). Page 234 of the SDP Report of Examination states that any assumptions on the redevelopment of brownfield sites needs to be clearly justified for each local development plan area. It then goes on to state that any findings of the SESplan Urban Capacity Study are considered to not necessarily be a sound basis for doing so. It sets out the concern that although these studies have identified sites, many of these may well be brought forward instead as allocated housing development sites and therefore would result in double counting. The Housing Land Study June 2014 avoids this risk by basing its estimate of potential windfall completions on an understanding of urban capacity which is site specific. This allows any double counting to be identified and avoided. The study categorised each site according to probability of development. Only those sites with a high probability for development are included in the windfall assumption. High probability sites are defined as sites within the Scottish Vacant and Derelict Land Survey, derelict buildings, sites with known developer interest, sites confirmed for disposal and sites which have permission for other uses, or under construction since the Housing Land Audit 2013. A 10% error margin has been applied to the figures and in order to identify a justifiable windfall assumption, the minimum figure of 5,200 has been used. This is equivalent to an annual average of 520 units a year over the 10 year period of the Plan.

A number of sites identified within the Housing Land Study, June 2014 as having potential for development have since come forward for housing development. The Housing Land Audit 2014 demonstrates that windfall sites, identified by the study, totalling more than 750 units have received planning consent. A number of these are under construction. The combined capacity of these windfall sites contained within the Housing Land Audit 2014 is in excess of the combined capacity identified in the Housing Land Study June 2014. A further 670 units have received

consent since the Housing Land Audit 2014 was published in March 2014 and there are applications pending for a further 400 units. Appendix A of this form provides details of these sites.

The level of windfall completions in Edinburgh has historically been high. The table below sets out the amount of windfall since 2005/06. It shows an annual average of 919 units. This is well in excess of the 520 units per year average implied by the windfall assumption of the Plan.

	Total	**Windfall**
2005/06	2,242	1,160
2006/07	2,487	1,118
2007/08	2,405	1,286
2008/09	2,554	1,118
2009/10	1,810	800
2010/11	1,037	519
2011/12	1,624	865
2012/12	1,191	465
2013/14	2,079	944
Annual Average		919

The Housing Land Study June 2014 is therefore considered to offer a realistic evidence based approach to estimating windfall taking into account assumptions about future trends and provides sufficient justification for the windfall assumption. The Council therefore disagrees that the windfall assumption should be reduced or increased.

Constrained Site assumption

The contribution of constrained sites to the LDP housing land supply target is set out in the Housing Land Study June 2014, Appendix 1. The constrained sites contributing to meeting the housing land requirement supply target do not include all of the established supply which is defined in the Housing Land Audit 2013 and they are different to those sites identified within the windfall calculation referred to above. Sites have been considered on an individual basis. Many sites considered to be constrained at the present time are affected by short term constraints which may quickly be overcome. This can be demonstrated from the Housing Land Audit 2014 which shows that more than 780 units identified in the Housing Land Audit 2013 as constrained have become effective. A further 620 units have received consent between March 2014 and January 2015. Appendix A, Tables 4 – 6 of this Schedule provides details of these sites. It is not considered necessary to reduce the contribution of constrained sites to the housing land supply.

Demolitions assumption

The justification for demolitions is set out in the Housing Land Study June 2014, pages 15 - 16. Most demolitions in Edinburgh are of Council housing stock. Demolitions in the period 2009-2015 have been carried out under the Council's Asset Management Strategy for Council Housing (2011- 2015). They come at the end of a long period in which Council housing stock has been sold or refurbished to meet quality standards, or demolished. The remaining stock has received

significant investment, and is due to meet the Scottish Housing Quality Standard by 2015. It is therefore appropriate to assume that there will not be further large scale demolitions of Council housing stock in the remainder of the period 2009 – 2024. The assumption of 2,000 demolitions includes an allowance for 150 units in addition to those already demolished or programmed to be demolished in the period 2009-2015. Demolitions are deducted from the supply of housing as they represent a reduction in existing supply. It is not considered necessary to increase the allowance for demolitions.

Capacity/density assumptions

Site capacities for new greenfield allocations included in the Plan are based on a density range of 25 to 35 dwellings per hectare. The density range has been provided to allow flexibility to the masterplanning and place making process. An exception has been made for the largest site, Maybury, because otherwise the very large developable area would result in a very wide capacity range with implications for identifying infrastructure needs. Therefore, the range has been halved to 27.5 dwellings per hectare to 32.5 dwellings per hectare. Indicative developable areas for housing have been calculated taking into account the requirements set out in site briefs. These areas are shown in the Environmental Report Second Revision, June 2014, Volume 2 at the end of Appendices 5, 6, 7 and 8. For other new allocations density has been applied appropriate to location. Mid point capacities have been applied in calculating the contribution of new allocations to meeting the housing land supply target. These are set out on Page 3 of the Housing Land Study June 2014. A review of sites was undertaken in the preparation of the Second Proposed Plan resulting in the capacities of some site being altered. Capacities are considered to be reasonable and by using the mid point capacity provide further generosity to that provided by the addition of 10% to the housing land requirement

Time periods

It is considered that all new LDP housing proposals can be delivered within the timeframe of the Plan. Where a site has capacity beyond the Plan period this has not been included in the allocation. Appendix 1 of the Housing Land Study June 2014 sets out the contribution of effective sites to meeting the housing land requirement for each year of the Plan period. All sites contributing to the housing land supply target are either effective or capable of becoming effective in the period up to 2019. No sites are being held back to the post-2019 period. Therefore if the market is strong enough and the demand exists, sufficient land will have been made available.

Notwithstanding the position of the Council that there is no need to split the requirement over the two time periods, an alternative to Table 7 has been prepared. It is set out below and shows the housing requirement and how this would be addressed in each of the two time periods.

Some representations suggest figures to be contained within a revised Table 7 based upon two separate time periods. Each have applied varying assumptions to individual elements of the calculation. The assumptions are not considered appropriate for the reasons set out above relating to generosity, constrained sites, windfall, demolitions, site capacities and programming. Accordingly, the Council's

alternative to Table 7 only splits the time period.

Setting the LDP Housing Land Requirement	**2009-2019**	**2019-2024**	**2009-2024**
The City of Edinburgh Council Housing Land Requirement	22,300	7,210	29,510
10% to ensure a generous supply	2,230	721	2950
LDP Housing Land Requirement	**24,530**	**7,931**	**32,460**
Meeting the LDP Housing Land Requirement			
Effective Supply	7,272	3,703	10,975
Constrained Sites coming forward	729	3,430	4,159
Housing Completions 2009 -2013	5,642		5,642
Windfall	3,467	1,733	5,200
Demolitions	-2,000	0	-2,000
Total Supply from Existing Sources	**15,110**	**8,866**	**23,976**
LDP Housing Land Requirement	24,530	7,931	32,460
Total Supply from Existing Sources	15,110	8,866	23,976
Target to be met through new LDP allocations	**9,420**	**-935**	**8484**
New LDP Allocations			
New brownfield allocations	333	482	815
Sites in West Edinburgh Strategic Development Area	850	1,950	2,800
Sites in South East Edinburgh Strategic Development Area	1,068	2,087	3,155
Sites elsewhere in the city	445	1315	1,760
Total New LDP Allocations	**2,695**	**5,834**	**8,530**
Difference ('-' indicates excess completions)	**6,725**	**-6,769**	

Alternative Table 7

Programming of effective sites and allocations identified within the first Proposed Plan to 2020 are set out in the Housing Land Audit 2014 and have been agreed with Homes for Scotland. New allocations have been programmed. All allocations are considered to be deliverable within the Plan period. Notional programming is set out in Appendix B of this Schedule.

The alternative to table 7 shows that the scale of the requirement in the first part of the period of the Plan could not be fully met by the sites in the Second Proposed Plan. Within the second time period there would be an equivalent overprovision of new housing land (~6,700 units).

The Council does not agree that the SDP and Supplementary Guidance Housing Land November 2014 should be interpreted as requiring local development plans to allocate land separately for the two time periods.

Such an interpretation relies on a narrow reading of the SDP and Supplementary Guidance, and results in an unrealistic and detrimental over-allocation of land which is contrary to other parts of the SDP and to national policy.

Scottish Planning Policy only requires that LDPs allocate a range of sites which are effective or expected to become effective in the 'plan period' to meet the housing land requirement of the SDP up to year 10 from the expected year of adoption (paragraph 119). The SDP and Supplementary Guidance need to be considered as a whole. The above alternative to Table 7 indicates that if that interpretation is taken, there would be a gap within the first period of significant scale.

Table 3.2 of SDP Supplementary Guidance Housing Land November 2014 sets out indicative additional allowances for housing land in Edinburgh which total 7,700. The allowances are based upon the principle of meeting need and demand close to where they arise, relating requirements to the main centres of employment, deliverability of housing and capacity analysis. Table 3.2 does not split this additional allowance into the two time periods. In contrast, representations which do seek this split suggest additional allocations of varying but larger scales. For example Wallace Land Investment and Management (2281) suggest that an allocation of more than 14,000 units is required in the period 2009-2024. To provide additional allocations of the scale suggested by representations would be well in excess of that set out in Table 3.2 and envisaged by Ministers in approving the Supplementary Guidance.

Appendix C to this Schedule sets out notional programming of the sites promoted in representations grouped in Issues 14 to 17. It demonstrates that even if they were all allocated, granted permission and commenced construction so as to provide first completions in 2017/18, they would not be sufficient to provide the additional 6,700 completions in the period 2009-2019 identified in the alternative to Table 7 above. They would provide less than half (~3,000). They would however result in an even larger over-allocation for the subsequent period - a further 6,200 excess completions on top of the 6,700 identified in the table above.
In practice, this over-allocation of land on mostly greenfield sites would impact on delivery of sites in the existing land supply.

Such over-allocation would also give rise to further major infrastructure actions which would likely require some level of public funding for which resources are unlikely to be available. This is evidenced by a Planning Committee report on an Action Programme Update (14 May 2015). This highlights the estimated total cost for infrastructure to support the scale of allocation in the Second Proposed Plan and the likelihood that this will not be met solely by developer contributions (see for example paras 3.10-3.11 and 5.1) resulting in significant funding gap for which there is no current budget.

In conclusion, over-allocation of housing land to meet a gap which only arises as a result of an artificial time constraint would be detrimental to the realisation of the SDP's spatial strategy and inconsistent with the SDP provisions for flexibility (paragraphs 114 - 115). It would result in the failure to minimise loss of green belt land, as required by paragraph 130 of the SDP and unnecessary release of less suitable sites. It would be likely to result in the stalling of existing, mostly brownfield, sites which would otherwise be developed. It would involve unnecessary and inefficient over-identification of infrastructure enhancements. It would therefore be inconsistent with the principles of sustainable development set out in Scottish Planning Policy paragraph 29, and the principles of directing the right development to the right place set out in paragraph 40.

It is therefore appropriate to take an approach which considers all of the SDP and its Supplementary Guidance in the round and in the context of Scottish Planning Policy. Sites have been selected for inclusion within the Plan according to the strategy of the SDP and to meet the aims of the LDP. It is considered that the allocations within the Plan are justified, provide a range and choice of sites which can be developed within the period of the Plan and provide a generous supply which conforms to the SDP and its Supplementary Guidance. The Council does not consider that it is necessary to change Table 7 or the text. No modifications proposed.
(0698 David Wilson Homes and J & J Muir; 0749 Cramond and Harthill Estate; 0755 BDW Trading Ltd; 1133 Danzan 2003 Trust ; 1154 CALA Management Ltd; 1159 New Ingliston Limited 1202 Land Options East; 2126 Cockburn Association; 2251 Taylor Wimpey; 2265 Springfield Properties; 2272 Lord Dalmeny; 2274 CALA Management; 2275 Murray Estates; 2277 Hallam Land Management Ltd; 2276 Gladman Developments Ltd; 2278 Stewart Milne Homes; 2279 Hallam Land Management Ltd; 2280 Mr and Mrs Philip and Barratt David Wilson Homes; 2281 Wallace Land Investment and Management; 2290 Edinburgh Developers' Group (Edinburgh Chamber of Commerce); 2291 Defence Infrastructure Organisation; 2408 HolderPlanning; 2416 Miller Homes Ltd; 2421 SEEDco; 2684 Homes for Scotland; 2703 Ogilvie Homes; 1124 Liberton Association)

- The guidance in PAN 2/2010 that windfall sites should count towards meeting the housing land requirement only once planning permission has been granted for residential development and it is considered to be effective or is being developed relates to housing land audits and does not apply to the approach to meeting the housing land supply target within an LDP. No modifications proposed. **(2276 Gladman Developments Ltd)**
- The housing allocations in the Plan range in scale from 15 units to more than 4,000. Almost one third of existing housing proposals are for sites with capacity estimates of less than 250 units. New housing allocations outwith Strategic Development Areas include a further five sites with a capacity of less than 250 units. It is considered that the Plan provides a generous supply of housing land on a range of sites across the city and it is not necessary to allocate further small sites. No modifications proposed. **(1154 CALA Management Ltd)**

<u>5-year effective land supply</u>

- Scottish Planning Policy and SDP Policy 6 requirement to maintain a continuous 5 year supply of effective housing land will be monitored on an annual basis through the housing land audit. Annual housing land audits are recognised in PAN 2/2010, paragraph 45, as the established means to demonstrate the availability of sufficient effective land. The Housing Land Audit is updated annually. Paragraph 64 of the Plan states that Edinburgh's supply of housing will be monitored through the annual housing audit. Reference to this document is considered to be sufficient and appropriate and the Council therefore disagrees that the Plan should show information to demonstrate that five year effective land supply is available. No modification proposed. **(2088 Scottish Government)**
- SDP Policy 6 (Housing Land Flexibility) and Policy 7 (Maintaining a Five Year Housing Land Supply) provide mechanisms to ensure that a five years' effective land supply is maintained at all times. Policy 6 indicates that the scale of this supply shall derive from the requirements identified through the Supplementary Guidance. This does not require that the five year effective land supply is assessed separately in two partitions up to 2024. If necessary, Policies 6 and 7

enable land to be brought forward to maintain the five year effective land supply. Scottish Ministers instructed that before adopting the Supplementary Guidance on Housing Land, a sentence on how to calculate the 5-year effective land supply was removed. It should be noted that Scottish Ministers did not amend the sentence to require the calculation to be based on the period 2009-2019. Therefore, the SDP does not endorse the calculation of the five year effective land supply using the period 2009-2019.

Paragraph 119 of Scottish Planning Policy states that LDPs should allocate a range of sites to meet the housing requirement of the SDP up to year 10. The housing requirement up to 2024 therefore needs to be met. Paragraph 64 of the Plan sets out a 5 year housing supply target of 10,850. The calculation is detailed below.

Housing requirement 2009-2019	22,300
Housing requirement 2019-2024	7,210
Total Requirement 2009-2024	**29,510**
Completions 2009-2013 (HLA 2013)	5,642
Requirement 2013-2024 (HLA 2013)	23,868
Annual average	2,170
5 year requirement	**10,849**

Scottish Planning Policy does not prescribe a method of calculating the 5-year housing land supply. There are a number of methods which could be used to calculate the five year requirement. The method used within the LDP is considered to provide an acceptable basis on which to calculate the five year supply.

The Housing Land Audit 2014 identifies an established land supply of 30,865 of which 20,935 is identified as effective. The effectiveness of many sites in the Housing Land Audit 2014 is currently affected by factors which may be overcome in the short term. It is not considered that this is an issue which will be resolved by the identification of any further sites in the Plan. No evidence has been provided to demonstrate that further sites would be more deliverable than those already in the housing land supply or new sites already identified in the Plan. Further sites proposed in representations are dealt with under Issues 14 – 18.

The LDP Action Programme provides a delivery mechanism which will assist in bringing forward sites for housing development. The allocations provided in the plan are considered to be sufficient to maintain a five year effective land supply. No modifications proposed. **(2279 Hallam Land Management Ltd; 2684 Homes for Scotland; 0755 BDW Trading Ltd; 2274 CALA Management; 2280 Mr and Mrs Philip and Barratt David Wilson Homes)**

- The Plan aims to balance the need for housing land with protection of the environment. The new greenfield sites allocated within the Plan are considered to be those which best meet this aim. The statement at paragraph 67 reflects the approach of the Plan to protect greenfield land and release of greenfield land is best delivered through the development plan process. Should additional land be needed to maintain a five years' effective land supply SDP Policy 7 would allow for greenfield development subject to 3 criteria. No modifications proposed. **(2684 Homes for Scotland)**

Housing Land Study

- As set out in the section above, 'Meeting the housing land supply target', it is not considered necessary to address the requirement for the two separate periods. The references to this should remain within the Housing Land Study. **(0755 BDW Trading Ltd; 2276 Gladman Developments)**
- The Housing Land Study sets out the expected completions from effective sites and constrained sites. Programming for sites included in the first Proposed Plan, as agreed in the Housing Land Audit 2014, and notional programming for new allocations in the Second Proposed plan are set out in an appendix to this form (Appendix B). No modification proposed. **(2279 Hallam Land Management Ltd)**

COMMUNITY FACILITIES

- Paragraph 72 of the Plan acknowledges that housing proposals will have implications for the provision of primary care and other community health services. Policy Hou 10 states that planning permission will only be granted where there are associated proposals to provide any necessary health and other community facilities. Growth allocations set out in the Plan have been discussed with the Edinburgh Community Health Partnership. No specific actions have been identified for inclusion in the Action Programme at this time. Should specific actions be identified these will be detailed in future iterations of the Action Programme. No modification proposed. **(0244 Tony Gray; 2648 Mike Crockart MP)**
- An Education Infrastructure Appraisal has been carried out to identify school infrastructure requirements of new housing proposals within West Edinburgh. This includes an estimate of the number of pupils that might be attributed to the International Business Gateway housing element as described in the Second Proposed Plan. If this were to change through post-examination modifications, an updated education appraisal could be carried out to inform the first post-adoption Action Programme. No modification proposed. **(1089 New Ingliston Limited)**
- Since the period of representations the Council has identified a potential site for new education infrastructure elsewhere in the south Edinburgh area. While the Astley Ainsley site is still considered a potential alternative option for the delivery of education infrastructure, the suitability of land and its availability for acquisition has not been determined. No modification proposed. **(1726 Marchmont & Sciennes Community Council).**
- An Education Infrastructure Appraisal and Transport Appraisal have been carried out to assess infrastructure requirements of new housing proposals. In West Edinburgh these actions include a new Maybury Primary School (SCH 6), and additional capacity within both the non denominational and denominational primary and high school estate. In Queensferry actions also include a new primary school (SCH 10) and additional capacity within both the non denominational and denominational primary and high school estate. In South West Edinburgh additional primary school capacity is identified. A Transport Appraisal identifies improvements to transport infrastructure to deal with the cumulative impacts of new housing proposals. These transport actions are set out in the Council's Proposed Action Programme. The detail of these actions will be established through transport assessments which will be required at the planning application stage. Greenspace is provided within site briefs and actions are identified in the Action Programme. No modification proposed. **(2648 Mike Crockart MP)**

Reporter's conclusions:

Overview

1. The schedule 4's, as prepared by the council, help to assist an efficient examination. However, this does not detract from the need to address the issues raised in representation to the proposed plan as a whole. In this context, our assessment has identified a number of re-current themes running through the submitted schedule 4's and the detail of the individual representations received:

- That there is a shortfall in the land supply which justifies further additional land release
- That the green belt should be protected in the long term
- That there is a significant supply of brownfield land that should be utilised first
- That there are more suitable housing sites available
- That the infrastructure required to support the proposed housing (particularly transport and schools) has not been addressed.

2. A number of these themes were the subject of further information requests. In addition hearings were held on the 18 and 19 November on the housing land supply and on its delivery including the provision of the appropriate infrastructure. A further exchange during April and May of this year focussed on the assessment of greenfield sites as suggested for inclusion in West and South East Edinburgh.

3. These issues extend beyond particular sections or policies of the plan. Consequently these themes, which in the main relate to the extent of proposed housing land, are drawn together below. Cross reference to the detail included in other schedule 4's is included as appropriate.

Context

4. A target for delivery of housing land is established through SESplan. If the local development plan does not identify land sufficient to enable this target then I must consider what steps should be taken, through modification to the proposed plan, to address this deficiency.

5. Whilst a matter raised mainly in the context of individual sites, the issue of infrastructure provision has a bearing on the timely delivery of sites and the appropriate mitigation of transport and education impacts. There are wide ranging concerns around these issues.

6. The remaining more specific issues as raised in representation relative to the section on housing and community facilities are addressed in the final section of my conclusions.

The Housing Land Requirement

7. A Housing Need and Demand Assessment (HNDA) was carried out for SESplan and this was signed off as robust and credible. Scottish Planning Policy paragraph 113

advises that "where the Scottish Government is satisfied that the HNDA is robust and credible, the approach used will not normally be considered further at a development plan examination." The assessment process follows an accepted methodology which takes into account a variety of factors and is not based purely on the National Records of Scotland Projections. I find no basis to revisit or question the HNDA assessment as the basis for the calculation of the areas housing needs.

8. The housing supply target is based on the HNDA but is a policy view of the number of homes that are needed by local authority area. SESplan predates current Scottish Planning Policy so does not use the word target but refers to housing requirements and housing land requirements. However for the purposes of the examination there is nothing to suggest to me that the figures in SESplan should not be interpreted as the target. Paragraph 108 of the strategic plan clarifies the plan's role to ensure that the areas overall assessed housing requirements can be met by new house completions. SESplan clarifies that some of the housing demand generated by the city will be accommodated in the wider city region. The local development plan is required to demonstrate consistency with the Strategic Development Plan. The housing target as set through SESplan and its associated supplementary guidance is already approved and not a matter for this examination.

9. The strategic plan was approved in 2013 and sets out targets from 2009-2019, 2019-2024 and in the longer term to 2032. These figures are not broken down to local development plan areas. However, the target for the City of Edinburgh up to 2024 is further detailed in Table 3.1 of the SESplan Supplementary Guidance on Housing Land November 2014 as 22,300 units to 2019 and a further 7,210 units up to 2024. Paragraph 3.7 explains that most of this housing is expected to be built on sites already in the current local plan or where there is already planning permission.

10. Table 3.2 then sets out the potential additional contribution required from the West and South East Strategic Development Area at 2700 and 2500 units respectively. A further 2500 units are estimated to be required on land elsewhere in the City. These figures are stated to reflect an analysis undertaken of opportunities and constraints within the Strategic Development Areas. Paragraph 3.9 clarifies that no significant brownfield opportunities have been identified to assist in meeting the additional requirement.

11. Paragraph 3.8 of the guidance goes onto explain that the requirement for new sites depends on the extent to which existing sites are capable of delivering house completions by 2024 and that any changes will have implications for the amount of additional land required. From this it is clear to me that Table 3.2 was intended to be indicative subject to re-assessment of the housing land supply through the local development plan process. However, I understand the expectation of local communities and others that these figures would give a reasonable indication of the spatial strategy for new housing development.

12. Diagram 1 on page 30 of Scottish Planning Policy illustrates how the housing land requirement should be derived from the target and met by the local development plan. Paragraph 119 explains that the local development plan should meet the strategic requirement up to year 10 from the expected date of adoption. Applying this time period to this local development plan indicates a period from 2016-2026. This was agreed by parties at the hearing even although SESplan only sets out a target up to 2024.

13. Table 1 below sets out the target for housing supply which applies to this proposed Local Development Plan over the SESplan period up to 2024 and then for the remaining

two years up to 2026.

Table 1. The housing target for the City of Edinburgh 2009-2026

	To 2019	2019-2024	Remainder 2024- 2026*	Total 2009-2026
SESplan	22,300	7210	2884 5672*	32394 35182*

* Alternate figure presented in submissions to the hearing,

14. It is straightforward to determine the figures in the first two columns from SESplan. However determining a target in the longer term from 2024-2026 is more problematic. Whilst longer term needs are assessed in the HNDA, the supplementary guidance on housing land does not include a target for this period.

15. House-building interests at the hearing directed me to an extract from the HNDA, as submitted by the council, in response to my first further information request. This shows the total estimated demand for housing up to 2032. It includes an annual figure of 2836 which equates to 5672 over the period 2024-2026. This approach, as highlighted in table 1 above, results in a significantly higher figure than that suggested by the council. The council considers it is more appropriate to continue an average rate of completions based on that established through SESplan for the previous 5 years. The figure 2884 is then derived by dividing the figure in the previous column by 5 (1442) and multiplying by two to arrive at the total of 2885.

16. My conclusion is that the main objective of including this longer time period is to maintain the continuity of the land supply. Projections inevitably become increasingly unreliable into the future. SESplan and this local development plan will be reviewed in advance of this timeframe. Whilst the SESplan supply target reflects the HNDA some of the identified demand is to be met in other areas. This is explained in paragraph 3.5 of the Housing Land Supplementary Guidance 2014. Consequently, whilst neither view is necessarily wrong, I am content that the council's more conservative estimate is applied.

17. Given the time lag between preparation of SESplan and this local development plan, I consider that it is appropriate to update the housing target in light of current circumstances. In taking account of completions and demolitions the first column can be updated so that it applies only to the remaining 4 year requirement from 2015-2019. Table 2 below reflects the revised supply target for the period under consideration from now until 10 years from anticipated adoption of this proposed plan (so up to 2026). Representations question the approach to demolitions being added to the calculation. The table below illustrates that it is necessary to take account of additions to the housing stock (through house-building that has taken place) and deletions (loss of housing stock through demolitions) in order to arrive at the remaining target.

Table 2 The supply target 2015-2026

	To 2019	2019-2024	Remainder 2024- 2026*	Total 2015-2026
Minus Completions	9266			9266
Plus Demolitions	2000			2000
Supply Target from 2015.	15,034	7210	2884	25128

18. Paragraph 116 of Scottish Planning Policy states that within the overall housing supply target, plans should indicate the number of new homes to be built over the plan period. This figure should be increased by a margin of 10 - 20% to establish the housing land requirement so that a generous supply of land for housing is provided. The exact extent of the margin will depend on local circumstances, but a robust explanation for it should be provided in the plan.

19. In this case such a margin was not included in the strategic plan which pre-dates the current Scottish Planning Policy. Instead the flexibility is added to obtain the housing land requirement for this local development plan. The proposed plan applies a margin of 10% flexibility as indicated in the table below. I return to the matter of the sufficiency of this margin and whether it should be increased below.

Table 3 The housing land requirement including generosity

	2015-19	2019-2024	Remainder 2024-2026	Total
Plus 10% to ensure generosity	**16,537**	**7931**	**3172**	**27640**

20. Having established the above requirement it falls to the local development plan to demonstrate how this can be met. Scottish Planning Policy paragraph 117 explains that this can be met from a number of sources, most notably sites from the established supply which are effective or expected to become effective in the plan period, sites with planning permission, proposed new land allocations and in some cases a proportion of windfall development. Windfall sites are defined as sites which become available for development unexpectedly during the life of the development plan and so are not identified individually in the plan.

21. Table 4 below shows the anticipated contribution of sites in the existing land supply. These are sites in the current local plan and sites with planning permission. The figures for the effective supply were updated through the hearing process to reflect the current 2015 housing land audit. The top figures represent those presented by the council whilst those highlighted reflect the alternate figures presented by Homes for Scotland.

22. Representations question the need for additional land given the stock of existing land including the extent of brownfield sites. However, meeting the SESplan target does not just require a stock of land but that the identified land is capable of delivering housing in the relevant time periods. This assessment brings in a range of other considerations such as marketability, land ownership and infrastructure delivery. Table 4 therefore shows the amount of land which has in the main been agreed, through the housing land audit process, as being effective or capable of delivering housing rather than the total stock of available land. This assessment of the existing supply and its capacity to deliver house completions in the timeframe is a requirement of SESplan as referenced above. This may then have implications for the amount of additional land required over and above that envisaged in Table 3.2 of the Supplementary Guidance.

Table 4 Meeting the LDP 10 year Housing Land Requirement- existing supply.

Meeting the LDP Housing Land Requirement.	2015-2019	2019-2024	Remaining requirement to 2026	Total 2015-2026
Effective supply	6410 6464*	4774 4944*	1490 1597*	12674 13005*
Contribution from sites capable of becoming effective	0	2324 913*	826 225*	3150 1138*
Windfall	1694 1008*	2116 1260*	846 426*	4656 2694*
Total supply from existing sources (derived from 2015 HLA)	8104 7472*	9214 7117	3162 2248*	20480 16,837*

* Homes for Scotland Figures as updated through Further Information Request 9.

23. The need for new land to be included in the local development plan is then calculated by deducting the existing supply from the total requirement. This is shown in table 5 below. The negative figure in the second column indicates that the council anticipates a surplus of land in the period 2019-2024. This surplus is not evidenced in the submissions of the house-building industry for the reasons discussed further below. However, in general I consider it is appropriate to conclude that, given the anticipated greater output from the established supply in later years, the most pressing requirement is for new sites that can deliver housing in the short to medium term.

Table 5 Required new land allocation. Requirement minus total supply from existing sources.

	20015-2019	2019-2024	2024-2026	2015-2026
Required New LDP allocation	8433 9065*	-1283 814*	10 3991*	7160 13,871*

* Homes for Scotland Figures as updated through Further Information Request 9.

24. Table 6 below then shows how the proposed plan has addressed this requirement through the allocation of new sites on brownfield land, within the West and South East Edinburgh Strategic Development Areas and in other locations across the city. Again this shows the current anticipated programming of this land. The first row indicates the significant extent of the remaining anticipated shortfall in the period 2015-2019. Current programming as submitted by the council then shows a surplus in the remaining periods with a relatively small deficit over the whole period of circa 400 homes. Homes for Scotland's submissions, as echoed by most other parties at the hearing, show a slightly higher deficit in the first period and less of a surplus in the following periods with a consequent overall shortfall of circa 7000 homes.

Table 6 How the requirement is to be met.

Allocations	2015-2019	2019-2024	2024-2026	2015-2026
Brownfield	221	519	75	815
West Edinburgh SDA	175	1400	400	1975
South East Edinburgh SDA	756	1396 1461*	280 310	2432 2527
Outwith SDA	162 292*	1080 960*	288 213	1530 1465
Total new LDP allocations	1314 1444*	4395 4340*	1043 998*	6752 6782*
Current programming shortfall	7119 7621*	-5678 -3526*	-1033 2993*	408 7 089*

* Homes for Scotland Figures as updated through Further Information Request 9

25. Representations point to the potential of brownfield land to meet a much larger proportion of the city's needs. An emphasis on the role of brownfield land reflects national and local planning policy. Indeed the potential of the water-front is specifically recognised through the National Planning Framework 3. However, most of this land is part of the existing rather than the new supply. Current estimates of the contribution of this area to deliver housing in the short to medium term show only a relatively limited output in the early period of the plan. This does not undermine the future importance of this area but SESplan accepts that new sites in the Strategic Development Areas and elsewhere in the city will be required if an enhanced rate of house-building is to be achieved. More information on the water-front area is included in Issue 20 and I consider the issue of constrained sites below. However, I find all of this supports my conclusion that brownfield sites and capacity within the existing supply cannot currently be relied upon to meet the SESplan target.

26. The tables above were discussed at some length at the hearing session where the figures were checked and the underlying assumptions were explored. Subsequent submissions have presented some relatively slight variations in these figures to take account of recent approvals and changed circumstances. However, in accepting the figures are a snapshot in time; my assessment relies on those figures that were scrutinised through the hearing process. Based on these figures the areas of disagreement between parties, as highlighted above, are considered in turn under the following headings:

- The housing requirement to 2019 and how this should be treated in any calculation of the five year land supply.
- Windfall assumptions
- Assumed completions from constrained sites.
- The 10% margin of flexibility
- Infrastructure Delivery

The housing requirement to 2019 and the five year land supply.

27. Normally, the housing land requirement and the subsequent five year supply assumptions would be based on an average of the total number of houses that would be required to meet the target overall. However, SESplan distinguishes an early period to 2019 with an associated target of 22,300. This translates to a target of 15,034 by 2019 (table 2 above) when current completions and demolitions are taken into account. Table 7 below sets out the annual average rate of completions that would have to be achieved to meet the strategic housing targets. The first column indicates the significant impact the 2019 target has on the target rate of completions in the period up until 2019.

Table 7 Annual average rate of completions required based on the SESplan target.

	To 2019	2019-2024	Remainder 2024- 2026*	Total 2015-2026
Annual average completion rate	3759	1442	1442	2284

28. I understand that the 2019 target was added specifically to address an assessed backlog in housing need as identified through the HNDA. The council's submissions reference this in the context of a backlog in the need for social rented accommodation. However, SESplan makes no distinction in this respect.

29. Paragraph 3.15 of the guidance states that "A very significant increase in the rate of house completions across the SESplan area will be needed if the requirements set by this Supplementary Guidance are to be met. This is challenging and particularly so in the period 2009-2019 as it is expected that LDP'S will be adopted around 2015 around 6 years into the first period."

30. I note from submissions to the hearing that the annual average completions required to achieve the 2019 target, 3759 units, would exceed anything historically achieved even in the most positive economic circumstances. There was acceptance at the hearing that these build rates are unlikely to be realistic and the council's position is that even if all the land suggested through this examination was included the target could not be met. However, house-building interests remained of the view that significant additions to the land supply would help meet the target and maintain the continuity of the land supply.

31. There was no disagreement between parties that the target rather than the land requirement (which includes an additional margin) was the focus of any assessment of the 5 year land supply. Beyond 2019 the 5 year land supply target would simply be rolled forward based on completions to date and an average of the total remainder. However, by 2021 there should be a new strategic plan and a replacement local development plan.

32. I recognise the considerable difficulties in achieving a realistic delivery programme to account for this amount of housing in such a short remaining time-frame to 2019. However, the 2019 target is not expressed as phasing and there is no supporting text in SESplan to support flexibility in its application. The local development plan is required to be consistent with SESplan. I find no justification to conclude that the requirement to 2019 can be set aside.

33. Consequently, I find there is a significant shortfall in the anticipated effective land supply in the period to 2019. This points to a consequent and potentially on-going deficiency in the plan's ability to make provision for maintenance of a 5 year land supply at all times.

Land effective or capable of becoming effective and the definition of marketability

34. The council counters the argument that more land is required, particularly to meet the requirement to 2019, by suggesting that it has allocated sufficient land that is effective or capable of becoming effective over the plan period. It sees nothing to prevent the programming assumed in the later stages of the plan period coming forward earlier: "Therefore if the market is strong enough and the demand exists, sufficient land will have been made available". In its later April 2016 submissions the council reference a theoretical rate of programming as evidence that that the land supply is sufficient to meet the SESplan target.

35. The house-builders view is that it is incumbent on the council to provide a supply of land which can deliver a realistic rate of programming in the relevant time frames to meet the SESplan target. This should be demonstrated through assumptions agreed through the housing land audit process.

36. This has been a re-current theme in a number of local development plan examinations. I understand the expectation that there should be transparency between the strategic target and the corresponding amount of land identified in the local development plan. An approach based purely on programming may result in a total stock of land that is significantly in excess of that envisaged through SESplan. Marketability is a matter over which the council has limited control and the council cannot dictate the rate at which a site is delivered. In addition, a plan which places priority on the more immediate marketability of sites may not address other planning objectives such as urban regeneration, green belt and the efficient provision of infrastructure.

37. House building interests at the hearing interpreted the criteria on marketability (as set out in PAN 2/2010) to directly reflect a market view of an achievable rate of programming. However, perceptions and assumptions about programming may change over time and indeed even between audit periods. The council point to signs of increasing interest and activity in the delivery of the city's substantial brownfield resource along Edinburgh's waterfront (see Issue 20). Experience elsewhere has shown that regeneration areas can go onto become marketable locations and make a significant addition to housing completions.

38. Submissions were made about the recently published draft Planning Delivery Advice: Housing and Infrastructure. However it is clear to me that PAN 2/2010 remains in place until the draft advice has been finalised as stated on the Scottish Government's web site. This advice would not in any event change the terms of Scottish Planning Policy but would provide some further advice in securing its consistent interpretation and implementation in line with best practice.

39. In the context of this plan, I consider there is a lack of clarity around the issue of marketability and viability and the corresponding impact these have on the definition of effectiveness. The council suggests that the funding gap for brownfield sites is less than for greenfield whilst the developers indicate to the contrary. For example Holder Planning states that it is involved in the planning of a number of major greenfield and brownfield

sites in Edinburgh and that the significant majority of greenfield sites are capable of sustaining the developer contribution requirements of the Action Plan. They go onto state that " both major brownfield Waterfront sites we are involved with are not viable if they have to contribute the full requirement".

40. I have nothing to suggest that the current audit assumptions are unrealistic. There was a degree of consensus at the hearing that these figures already presented an optimistic view reflecting improving market conditions. I find that the emphasis of Scottish Planning Policy and SESplan is on delivering housing. In this context I consider that where land is not currently programmed or with some developer or market interest at this stage it is unlikely to contribute much if anything to completions in the first five year period. Beyond that I accept that higher outputs may be feasible and programmed outputs become less certain.

41. Drawing all of this together I do not accept the council's position that a theoretical rate of programming should be assumed and that this is sufficient to demonstrate the adequacy of the identified land supply. Whilst sufficient land may be available and capable of becoming effective at some point in the future SESPlan has a target to 2019 and then to 2024. The audit is the only substantive evidence I have to assess a realistic and agreed rate of housing delivery in these timeframes. The focus on the established land supply and brownfield sites should not be lost. However, I find that a greater range and choice of effective sites would be the most realistic means of increasing the rate of housing delivery in accordance with the challenging targets established by SESplan.

42. This is already, at least partly, reflected in the strategy of this local development plan. It accepts the release of sites currently in the greenbelt. These sites are anticipated to provide for some early programmed output. This view has also been reflected in recent appeal decisions but only where consistent with the other requirements of SESplan(mainly policy 7). This policy enables the release of greenfield housing sites either within or outwith the identified Strategic Development Areas to maintain an effective five year housing land supply where:

a. The development will be in keeping with the character of the settlement and the local area

b. The development will not undermine green belt objectives

c. Any additional infrastructure required as a result of the development is either committed or to be funded by the developer

43. There is no equivalent policy in the proposed plan or acceptance that additional greenfield/greenbelt sites may be required in this proposed plan. This matter is addressed in more detail through Issue 23. However, it is also relevant to my consideration of how the identified shortfall in the housing land supply should be addressed. I return to these matters below.

<u>Windfall assumptions</u>

44. The issue here centres on whether it is appropriate to assume a continuation of an assumed average rate of windfall completions or whether this should be reduced as sites come forward and are programmed in the audit.

45. The evidence for an assumed windfall contribution of 5200 units over the plan period is based on the Housing Land Study (Section 3) June 2014. This looked at sites within the urban area identifying a total potential capacity of 14746 units of which 5753 were considered to have a high probability of becoming available for development. Reduction to provide for a 10% margin for error and a rounding up of the figures provided the estimated contribution of 5200. This study was based on the 2013 housing land audit and sites in the effective and constrained supply for the Strategic Development Plan were filtered out to avoid double counting.

46. The council's revised table 7, as submitted to the hearing, rolls the calculation forward on the basis of the 2015 Audit. The windfall assumption is reduced to deduct completions arriving at a remaining total of 3810 units (2019-2024). This provides an assumed annual average of 423 units and this average assumption is continued into the 2024-2026 period to provide an estimated total of 4656. Other submissions to the hearing pointed to a reduction in the remaining total taking into account the 2015 audit position, including future programming, to arrive at a reduced remainder of 2,268. This results in a reduction in the annual average to 252 units per annum. This is further reduced to an average of 213 homes per annum if the additional period 2024-2026 is added giving an estimated total of 2694.

47. In my consideration of these matters, I have returned to the definition of windfall in SESplan and as reflected in Scottish Planning Policy. Windfall sites are defined as sites which become available for development unexpectedly during the life of the development plan and so are not identified individually in the plan. Scottish Planning Policy goes onto advise that assumptions on windfall must be realistic and based on clear evidence of past completions and sound assumptions about likely future trends.

48. I do not consider the estimation of windfall can be an exact science. By their nature such sites come forward unexpectedly. There has been a relatively high rate of completions on windfall sites in the period since the council undertook its 2014 housing land study. I also understand that its estimates were arrived at having deducted an allowance for error. I consider that such capacity assessments can only ever provide general estimates.

49. My conclusion is that it is sufficient at this stage to rely on the council's evidence that there is identified potential capacity for windfall sites with a high probability of coming forward. There is also substantial additional potential albeit with an identified medium probability of coming forward. I consider it is appropriate to identify a trend so long as this has a reasonable prospect of continuing. Monitoring over the next few years will demonstrate whether this proves to be realistic. At this stage in the process, I find nothing sufficient to demonstrate that the council's assumptions are unjustified or that it is necessary to reduce the assumed contribution from windfall of 4656 over the plan period.

<u>Assumed completions from constrained sites.</u>

50. One of the main differences in view between the council and other parties at the hearing was the assumption that a number of constrained sites could become effective over the plan period. The initial view of Homes for Scotland was that sites identified as constrained in the current audit should not be relied upon at all. However, the council has submitted additional evidence to support its assumptions (further information request 9 following the hearing). In response other parties accepted that some of these sites might come forward. Table 8 below highlights the remaining differences between parties:

Table 8 Assumed completions from constrained sites.

	Non-waterfront	Waterfront	Total
Council	1,163	1987	3150
Homes for Scotland	1,074	64	1138
Difference	89	-1923	-2012

51. This shows the most significant disagreement centres around the anticipated contribution of sites in the waterfront area. The anticipated contribution of the water-front is considered in more detail through Issue 20 but the main points relative to sites identified as constrained are outlined below:

LDPEW 1a Western Harbour-Platinum Point where the previous developer/promoter of the site went into administration. However the site is partially completed and has planning permission for the remaining units.

LDPEW1b Central Leith Waterfront where Forth Ports question the overall housing capacity of the site given its intended future role in port operations. Homes for Scotland question the access arrangements, the number of developers likely to be on site and current market demand for the type and density of housing proposed. The council consider that whilst the overall capacity will be reduced the sites can still contribute the assumed rate of programming. Programming does not rely on any housing completions on land within Forth Ports operational area in plan period.

Granton Harbour including Plots 3,31 and 29 Homes for Scotland again point to issues with the developer being in administration, the proposed mix of housing, a lack of active marketing of the site and the lack of developer involvement in the proposed masterplan. All of which lead to a lack of confidence in delivery of these sites. However I note that plots 3 and 31 have extant planning permissions.

52. Drawing all of this together I find that, from the evidence presented by the council, it is reasonable to assume some contribution from these constrained sites. The council's submissions programme these from 2020/21 recognising their capacity to become effective over the plan period. I note the council's reference to some 300 units in the 2013 housing land audit which were identified as constrained but are now completed/under construction. A further 950 units previously identified as constrained are now included in the agreed five year effective land supply. I agree that this serves to illustrate the potential for circumstances to change over the next five years.

53. Whilst I accept the uncertainty referenced in the Homes for Scotland's submission these are mainly marketing considerations which may change over time. I have nothing sufficient to demonstrate that these sites are not capable of becoming effective. If future monitoring proves these assumptions wrong this will increase the pressure to address the shortfall in the housing land supply through further green field land release. There has been a recent announcement from the Scottish Government about a 50 million pound Infrastructure Fund but this remains to be detailed. It may be that this or other alternate funding mechanisms may assist with an enhanced rate of house-building in the water-front area. The flexible grant and loan fund is intended to help unlock development plan compliant strategic housing sites of importance to increase the scale of housing delivery.

The 10% margin of flexibility.

54. Scottish Planning Policy references a 10-20% margin to be added to the housing land requirement. The council's margin is consistent with this but applies the lower margin of 10%. Representations and submissions to the hearing state that the historically constrained land supply position in Edinburgh, the backlog of need and optimistic assumptions regarding windfall and constrained sites justify the highest margin of flexibility.

55. Whilst the council points to an expectation of higher output from the identified land supply, than that currently identified in the audit, some sites may not perform as well as expected. In this respect I note the following extract from the reporter's report of examination on SESplan:

"It is also likely that land with a higher capacity than the numerical housing requirement will have to be allocated in each local development plan, because not all sites prove to be effective or capable of delivering all of their potential house completions in the time-scale initially anticipated. Doing so will also minimise the potential need subsequently to grant planning permission for further unallocated sites in order to ensure that the five years' effective housing land supply is maintained."

56. The council has responded to this by adding 10% to the numerical housing requirement. Table 7 shows that this alone has not proved sufficient, in current market conditions, to achieve the required rate of programming. Reliance on a mid-point density assumption for site capacity may provide some additional flexibility and a number of sites, including in the water-front area, have additional capacity which may have potential to be brought forward earlier if market conditions improve. However rather than provide additional flexibility, as referenced by the council, I consider such an uplift in performance of the identified land supply will at best help alleviate the identified shortfall particularly in the period to 2019.

57. The council has complied with the flexibility percentage advised by Scottish Planning Policy albeit at the lower end of the range. I find the fundamental issue here is one of how the housing target is to be delivered. Paragraph 3.15 of the SESplan guidance recognises that a very significant increase in the rate of house completions across the area will be needed if the requirements set by this Supplementary Guidance are to be met. This is challenging and particularly so in 2009 - 2019 as it is expected that LDPs will be adopted around 2015, around six years into the first period (2009 - 2019).

58. Given the inherent difficulties in meeting an already challenging target I am not persuaded that a further increase in the margin of flexibility would serve any clear planning purpose. The applied margin of flexibility offers consistency with Scottish Planning Policy. Consequently, and in the circumstances of this plan, I find that the 10% margin of flexibility is sufficient.

Infrastructure Delivery

59. The site specific issues reflect local concerns that the city's infrastructure will struggle to cope with the additional traffic associated with this level of growth. There are also significant concerns about the capacity of the city's schools. Whilst expressed in the context of particular sites these representations highlight a number of issues about how and when the required infrastructure is going to be delivered and who is going to pay for

this. At the same time Transport Scotland (Issue 19) state concern about the mitigation of cross boundary and cumulative transport impact to an extent that they question compliance with SESplan policy 8f. Through the hearing process Homes for Scotland stated that they do not share the council's confidence that the significant infrastructure requirements would be addressed on time.

60. The council's submissions to the hearing including the "Finance and Resources Committee report (Local Development Action Programme; Financial Assessment and next steps)" accepts the challenges and uncertainty the council must address in securing delivery of the required infrastructure. The council accepts the need to address issues such as forward and gap funding. Despite the council's assurance that it will bear any associated risk, and this will not hold up housing delivery, I consider that this uncertainty raises matters regarding consistency with SESplan particularly :

- **Policy 8f**- Local Planning Authorities in collaboration with Transport Scotland will take account of the cross-boundary transport implications of all policies and proposals

- **Policy 9b** Provide policy guidance that will require sufficient infrastructure to be available, or its provision to be committed, before development can proceed with particular emphasis on the strategic infrastructure requirements set out in figure 2.

61. In my opinion the council has done considerable work in this regard. However, this is not wholly transparent in the proposed plan subject to this examination. As set out in Issue 21, Circular 6/2013 on development plans distinguishes between the relative roles of the development plan subject to examination and supplementary guidance. This clearly states that supplementary guidance should not include items for which financial or other contributions , including affordable housing, will be sought and the circumstances, locations, or types of development where they will be sought. These matters should rather be addressed in the plan.

62. The Circular states it is suitable to address the exact levels of developer contributions or methodologies for their calculation in supplementary guidance. The role of Supplementary Guidance should be limited to the provision of further information or detail in respect of policies or proposals set out in the SDP or LDP. There must be a sufficient 'hook' in the SDP or LDP policies or proposals to hang the Supplementary Guidance on, in order to comply with policy.

63. A separate section on Action Programmes describes their role in setting out a list of actions to deliver each of the plan's policies and proposals, the name of the person who is to carry out the action and the timescale for carrying out each action. The first action programme is to be submitted to Ministers within three months of adoption of the plan and following this they should be updated and republished at least every two years.

64. From all of this I do not consider it is appropriate to introduce new matters through the action programme or specify additional items of infrastructure or the means through which they are to be delivered without first establishing these through the development plan. Other-wise I consider there is a risk that the plan lacks appropriate clarity on the required infrastructure provision.

65. Supplementary Guidance can provide a vehicle to address some of the detailed

considerations set out in the development plan where there is a sufficient hook in the plan. Such guidance once adopted has the advantage over the action programme in that it forms a part of the development plan and will be subject to due consultation. The action programme can then focus on delivery of those actions already established through the development plan and its associated supplementary guidance.

66. Consequently, I consider that it is important that all the main items of infrastructure to support the development strategy should be referenced in the plan. This matter is addressed through the relevant site specific issues and through Issue 21 which includes General Development Principles regarding the assessment and delivery of the potential key items of infrastructure required to enable delivery of development within those areas where most future development is proposed.

67. Given the likely funding challenges in addressing new schools provision and strategic transport infrastructure I consider further detail is required on how financial viability issues might be addressed and on the council's approach to forward and gap funding. Drawing on the conclusions in Issues 19 and 21 further detail would also be required, subject to the appropriate consultation, on the approach to cumulative contribution zones and to address the concerns of Transport Scotland. I do not see the action programme as the solution to these deficiencies as it does not form part of the development plan.

68. I find that appropriate changes are required to the proposed plan to further detail the requirement for and approach to timeous delivery of the required infrastructure. This is required to demonstrate consistency with SESplan polices 8f and 9b.

Options to address the matters raised above

Include more sites

69. At the hearing parties unanimously pointed the examination towards the inclusion of additional sites as this would enable greater certainty, avoid delay and better allow for the planned provision of infrastructure.

70. The options for this are limited to the sites suggested in representation. We based our assessment of the additional sites suggested in representation on the criteria set out in the council's housing site assessments in its Environmental Report Second Revision June 2014 and May 2015 addendum namely:

- Whether the site is brownfield or in the greenbelt
- Whether it has good accessibility to public transport or scope for this to be enhanced
- Whether there is infrastructure capacity or scope for this to be addressed
- Whether the development would impact on the wider landscape setting of the city
- Whether it would enable clear and defensible green-belt boundaries to be formed
- Impact on access to countryside recreation
- Acceptability of the impact from the SEA/HRA assessment
- Any previous public consultation responses
- Whether the site was likely to prove effective in the early part of the plan period.

71. Circular 6:2013 on Development Plans sets out the remit of the development plan

examination. This makes it clear that our task as reporters is first to examine the sufficiency of the proposed plan and only to consider alternative or additional proposals if the plan is found to be deficient in some respect. The Circular clarifies that modifications can be made so long as the reporter has adequate environmental information together with evidence arising from public consultation. Where a shortfall in the land supply is identified, as through this examination, then an assessment is required as to whether other sites are suitable for inclusion. The reporter's recommendations through the examination are, with certain exceptions, binding and there is no requirement for the plan to be re-issued for public consultation.

72. Given delays in bringing forward this local development plan and the extent of the apparent shortfall in the housing land supply a number of sites in the green belt have recently been approved at appeal. These greenfield sites have all been recommended for inclusion in the plan. There are a number of other suggested sites, as assessed through this examination, which I understand are now at or near planning application stage.

73. In coming to a view on the inclusion of sites the council has already accepted a shift in emphasis to focus on sustainable sites which will not compromise green-belt objectives. This is demonstrated on sites in West and South-East Edinburgh which were previously held to merit retention in the green belt but are now included in the proposed plan. Recent appeal decisions have identified additional land to meet housing need in sustainable locations whilst ensuring the Edinburgh Green Belt continues to meet its purpose. The purpose of the green belt is as established through SESplan Policy 12 and reflected in paragraph 34 of the proposed plan.

74. From our initial assessment of additional sites, as detailed in the relevant schedule 4's, the following sites were identified as having some potential for inclusion.

Table 9 Shortlist of candidate sites for inclusion following initial assessment:

Site	Schedule 4 Reference	Capacity- as indicated through proposed plan	Potential revised capacity or addition
International Business Gateway Policy Emp 6	Issue 20	300-400	2000-2400
Gilmerton Station Road HSG24	Issue 14	350-490	600-650
East of Millburn Tower	Issue 14	0	1300
Ravelrig Road Balerno	Issue	0	120
Edmonstone	Issue 14	0	170-370
The Wisp	Issue 14	0	71
Lang Loan	Issue I4	0	220
Lasswade Road	Issue 14	0	160
East of Burdiehouse	Issue 14	0	100-120

75. Our initial assessment of these sites in comparison with sites in the proposed plan or

approved at appeal showed only marginal differences, subject to appropriate mitigation, in respect of impact on green belt objectives, public transport accessibility and environmental impact. When balanced against the need to secure an enhanced rate of housing delivery these matters alone were not considered to rule out inclusion of these sites.

76. However this initial assessment identified a number of outstanding matters including:

- Establishing a consistent and long term approach to any new green belt boundary
- Consistency with National Planning Framework 3
- Matters relating to the continued operation of Science and Advice for Scottish Agriculture(SASA) if the site East of Millburn Tower were to be developed.
- The assessment of cumulative and cross boundary transport impacts.
- Strategic Environmental Assessment and Public Consultation

77. Consequently, further information was requested from relevant parties to assist in a more detailed assessment of the suitability of these sites for inclusion in the plan at this stage. In the interests of fairness and consistency, recognising the emphasis on the south-east and west Edinburgh Strategic Development Areas, all those with land interests in these areas were invited to make additional submissions. Assessment of the relevant information re-affirmed some elements of our initial comparative assessment particularly that sites, other than those listed above, were appropriately ruled out at this stage due to green belt and other planning considerations. For the remainder our further assessment led to the following conclusions:

Site	Schedule 4 Reference	Summary of Conclusion	Recommendation
International Business Gateway Policy Emp 6	Issue 20	Focus on nationally important business use to complement airport expansion. Concerns about conflict with National Planning Framework 3 outweigh the potential benefits of creating a mixed use sustainable community. Cumulative impacts of increased housing uncertain. Further assessment required of the relative split of uses in the context of the priority to be placed on strategic airport enhancements.	No change from proposed plan. Enhanced contribution to housing land supply not relied on at this stage.
East of Millburn Tower	Issue 14	In terms of Green Belt and accessibility – marginally less preferred to sites included in the proposed plan. However uncertainty around the required	No change to proposed plan. Not considered appropriate for inclusion through this examination

		access mitigation and the assessment of cumulative and cross boundary transport impacts. Remaining uncertainty as to whether the site would threaten the future viability of SASA operations.	
Gilmerton Station Road HSG24	Issue 14	Principle of extended development established through recent appeal decision. Lack of robust green belt boundary to the west.	Include larger site increasing capacity by 160 units and re-define green belt boundary for Gilmerton area.
Ravelrig Road Balerno	Issue 16	Established for inclusion through appeal decision.	Include site in proposed plan and amend green belt boundary.
Edmonstone	Issue 14	Established for inclusion through appeal decision.	Include site in proposed plan and amend green belt boundary.
The Wisp	Issue 14	Established for inclusion through appeal decision.	Include site in proposed plan and make consequential changes to green belt boundary.
Lang Loan	Issue I4	Established for inclusion through appeal decision.	Include site in proposed plan and redefine green belt boundary along Lang Loan.
Lasswade Road	Issue 14	Recognised potential to reconfigure green belt boundary along Gilmerton Station Road and Lasswade Road but remaining uncertainty about cumulative impacts.	Not considered appropriate for inclusion as a housing site through this examination. However recommendation to realign Green Belt boundary to include this site in the urban area.
East of Burdiehouse	Issue 14	Recognised potential to reconfigure green belt boundary along Lang Loan but remaining uncertainty about cumulative impacts.	Not considered appropriate for inclusion as a housing site through this examination. However recommendation to realign Green Belt boundary to include this site in the urban area.

78. Consequently, the examination has recommended the inclusion of a limited number of additional sites. This mirrors those which have already progressed at least to the extent of a notice of intention to allow planning permission at appeal. Inclusion of these sites in the plan should provide a clearer picture of the extent of proposed development. I consider that these sites are capable of becoming effective over the plan period.

79. I have not included these additional sites in my revisions to Table 7 as the

anticipated programming is a matter more appropriately left to the annual audit process. Consequently, my recommendations include a new paragraph to sit alongside table 7 explaining these further additions and that their anticipated output should be assessed through the audit process.

80. I recognise that these sites will be programmed through the plan period and are only likely to contribute a proportion by the 2019 target. Subsequent audits will determine the contribution these sites will make over the relevant time period. For other sites suggested in representation the relative balance of considerations did not support inclusion at this time as explained in the relevant schedule 4s.

81. Undoubtedly those promoting other sites may consider that the identified short fall in the housing land supply should have led this examination to include a greater number of the sites suggested in representation. However, I do not consider that achieving a programmed rate of completions to meet the housing land target can be viewed as the only objective of SESplan. Emphasis on achieving target rates of output need to be balanced with ensuring that sites come forward in a planned manner and with sufficient confidence that their impacts, including cumulative transport and education impacts, can be sufficiently addressed. Suggested additional sites have been subject to varying degrees of assessment but there are gaps and uncertainties about the extent to which cumulative impacts, particularly in relation to transport, have been assessed or can be addressed. A formal Strategic Environmental Assessment has not been undertaken for suggested additional sites and unless sites have otherwise progressed through the planning process there is limited evidence of public consultation.

82. Added to this there are concerns about further additions to the overall land supply beyond what was expected given the extent of remaining brownfield land. By way of example the council indicates the consequences of including all the suggested housing sites in West and South East Edinburgh and expresses concern that this would result in multiples of the level of growth expected in the Strategic Development Plan:

	From Supplementary Guidance Table 3.2	Capacity of land in proposed plan	Addition if all suggested sites were included.
West Edinburgh	2700	2800	6580
South East Edinburgh	2500	3155	7270

83. From my experience one of the main purposes of strategic planning is to provide a firm basis for infrastructure provision. SESplan estimated the amount of land that was likely to be required in the Strategic Development Areas and elsewhere. It assumed that the established supply including brownfield sites would by now be making a much greater contribution to the rate of housing completions. I do not consider that the fact that the market has not realised these assumptions justifies setting aside the spatial strategy of the development plan or the emphasis it places on bringing forward the significant potential of the water-front. The development plan signalled to the public and others an extent of housing in specific areas. The council consulted on this basis and has sought to identify land with the physical capacity to deliver the target and to address delivery of the associated infrastructure

84. Concerns about infrastructure provision are perhaps most accurately summed up by the statement that “in essence the proposal is to allow development to happen on an

iterative basis with developer contributions taken but with no clear masterplan as to how to tackle the transport issues and with the knowledge that the council will not have sufficient funds to address the emerging increased traffic problem." The council's submissions accept a funding gap in delivering the infrastructure required to support the extent of development already included in the proposed plan. The views of the Scottish Government on behalf of Transport Scotland add weight to concern that adding more sites would accentuate this uncertainty (Issue 19). There are also significant matters arising about the delivery of nationally important developments (airport expansion and the IBG) and the maintenance of existing uses which are considered to be in the national interest (SASA).

85. Whilst I have not relied on the draft PAN on Housing Land and Infrastructure Delivery it serves to illustrate the difficulties in reaching a firm conclusion on the issue of programming and the effective land supply. There remains a strong polarisation of views between the council and the development industry. This is reflected in the consultation responses which are currently being considered by the Scottish Government prior to finalising its advice.

86. I have placed significant emphasis on the housing land supply position but I consider that there are limits to the reasonable scope of this examination. Based on the available evidence and the remaining uncertainties as discussed above I find that the relative balance of considerations does not support modification through this examination to include further land release of a strategic scale. Consequently, I accept that the identified housing land supply, with the limited additions referenced above, would not currently achieve consistency with the SESplan target to 2019 and is unlikely to achieve a sufficient five year housing land supply at least in the early years of the plan period.

87. My conclusions through Issue 14 recognise the potential of some sites to come forward if the uncertainties summarised above can be appropriately addressed. Ideally these should be re-considered through the development plan process. However, my conclusions below also support a policy framework which would allow appropriate sites to come forward earlier to meet any shortfall. Through my conclusions on Issues 2 and 14, I have addressed matters relating to the significant changes proposed to the urban form of South-East Edinburgh and the potential this creates not only to establish a more robust long term green belt boundary but also to recognise some potential for future growth. I have also considered a similar approach in West Edinburgh but, for the reasons stated in Issue 14, I do not consider this could be justified at this time. In addition a further small amendment to the green belt is accepted through Issue 15.

A policy Approach

88. In recognising the challenges in delivery of the housing requirement and maintenance of the 5 year land supply the strategic plan makes provision for green field sites to come forward as planning applications subject to the relevant criteria.

89. Paragraph 65 on page 61 of the proposed plan acknowledges that SESplan Policy 7 sets out criteria to bring forward additional greenfield sites should annual monitoring show a shortfall in the maintenance of a five year effective supply. I consider this approach should also be reflected in the local development plan. However, I consider that the policy focus, on delivering the established land supply and the appropriate infrastructure, should not be lost and that there may be a diminishing supply of sites that can assist in delivering housing whilst achieving compliance with SESplan.

90. By the later stages of the plan period it may be that the council's more optimistic programming assumptions can be realised through growing confidence in the housing market and an associated increase in market interest on sites currently considered less attractive or constrained.

91. Many of the difficulties illustrated through this examination arise from delays in the process of bringing forward a land supply that is sufficient to address the SESplan target bearing in mind the realities of programming and delivery. It will remain important to progress an early replacement of the development plan in order to timeously address any revision to the housing target and how it is to be met. In the meantime, I consider it is mportant that the local development plan makes provision for further land release through the planning application process.

92. Consequently, I recommend inclusion of a replacement policy Hou 1 (as detailed through Issue 23). An enhanced wording should establish an appropriate mechanism to top up the land supply if required. Clear linkage through to policies on transport (see Issue 19) and developer contributions (see Issue 21) should ensure consistency with SESPlan. A consistent level of assessment and mitigation should be applied to sites brought forward through Hou 1 as to sites already included in the proposed plan. In stressing the importance of a plan led system I have also included text to highlight the importance of an early review of the development plan so that all these matters can be timeously addressed.

Supplementary Guidance

93. One option which that has been recommended elsewhere (an example was cited from the Scottish Borders local development plan examination) was to address the identification of an additional land supply through Supplementary Guidance.

94. This was not favoured by participants at the hearing who considered it would create delay and uncertainty. I consider this is likely to cause a significant time delay and divert resources from the process of preparing the next development plan. Such site selection is better addressed through the development plan process where consultation and a full assessment of available options can be more comprehensively addressed. In any event by the time such guidance was brought forward the process of replacing SESplan would be well underway and this may herald a change in circumstance. The strategic plan has an intended lifespan of 5 years and so would be due for replacement by 2018. For all these reasons I do not consider that supplementary guidance is the appropriate vehicle to address the identified shortfall in the housing land supply.

95. However, I think that supplementary guidance can assist in providing clarity about the required infrastructure and avoid delay in negotiating developer contributions. This would require clear "hooks" to be established through this local development plan. The detail would then fall to be addressed through expanded Supplementary Guidance on developer contributions and infrastructure delivery. Issue 19 identifies the need for this to address the concerns of Transport Scotland.

96. At the hearing the council explained that it would carry the risk of the required infrastructure provision and this would not delay development. However, without further detail on this I do not consider that the SESplan requirement (to provide policy guidance that will require sufficient infrastructure to be available, or its provision to be committed, before development can proceed with particular emphasis on the strategic infrastructure

requirements set out in figure 2) is fully addressed. In addition, in the absence of the further assessment required by Transport Scotland, the plan would not fully address SESplan Policy 8(f).

97. Consequently a number of text and policy changes are recommended through various site specific issues and through Issues 19 and 21. In combination, these provide a hook within the development plan for the preparation of statutory supplementary guidance to more fully address the details of infrastructure delivery. I find that this is required to address any consequent implications for delay in delivery of the housing land supply as well as consistency with SESplan.

Conclusions on land supply and delivery matters

98. Circular 6/2013 states that "In limited, exceptional circumstances, the reporter may identify a serious policy omission or deficiency in the plan, such as inconsistency with the National Planning Framework or Scottish Planning Policy. If this deficiency is not capable of being resolved through the Examination process due to a lack of sufficient information, or if the information required could not be provided within the normal timescale for an Examination the reporter will highlight the deficiency in the Examination Report."

99. It goes onto state that "In such circumstances the reporter will provide recommendation(s) on actions that could be taken to remedy the deficiency such as recommending that an early review of the plan be carried out, or the preparation of statutory Supplementary Guidance. Ministers have powers in section 20 to prevent a plan being adopted (or in the case of an SDP to reject a plan under section 13) and in circumstances where a plan has a serious deficiency may exercise those powers. Where such a serious deficiency was identified, until such time as the deficiency had been resolved, the level of certainty normally provided by a development plan may be greatly reduced, leading to more planning applications for development contrary to the plan and, perhaps, more planning appeals.

100. Drawing together all of the above, my conclusions are:

- The identified land supply shows a significant shortfall over that anticipated in SESplan in the period to 2019 and potentially beyond. This signals consequent on-going problems for the maintenance of the 5 year housing land supply. This conflicts with SESplan and with the requirements of Scottish Planning Policy.
- Brownfield sites have significant capacity but due to current market conditions an increase in programmed completions is unlikely in the short term
- SESplan accepts the need for additional housing land in the West and South East Edinburgh Strategic Development Areas and this requires a re-defined green belt.
- A greater number of effective sites would be required to enable programming to meet the SESplan target.
- The approach to infrastructure provision and the absence of evidence or associated actions to address cumulative and cross boundary transport issues is not currently in accordance with SESplan.

101. My conclusion is that these matters can be sufficiently addressed through the following actions as reflected in my recommendations below and in the other relevant Issues within this report:

- Retention of the sites identified in the proposed plan as these are all assessed

through this examination as appropriate for inclusion subject to any necessary revision/addition to the proposed site briefs/development principles.

- Inclusion of the additional housing sites referenced in table 9 above.
- Clarification of the approach to developer contributions and the delivery of the required infrastructure (Policy Del 1, Issue 21).
- Associated text changes to addresses the relevant balance of content between the plan, statutory supplementary guidance, and the action programme so that the main infrastructure requirements are referenced in the plan.(Issue 21)
- Inclusion of the main items of infrastructure provision within the plan rather than relying on the action programme.(Issue 21).
- Set out a policy framework for the release of additional sites in the event the five year land supply is not maintained (Policy Hou 1, Issue 23)
- Including a policy and associated text to address cross-boundary and cumulative transport impacts and give further explanation of the council's approach to seeking developer contributions (Issue 19).
- Including text committing the council to bringing forward the next local development plan as soon as possible to enable any remaining shortfall to be timeously addressed and to respond quickly to the requirements of the new SESplan (a new strategic plan is anticipated every 5 years so should be in place by 2018).
- Recommending some rationalisation of the green belt in South-East Edinburgh to provide more robust long term boundaries and to reflect the potential for future growth should acceptability be confirmed through further assessment.

102. In the short term I am conscious that there will be a time-lag in the preparation of the supplementary guidance, for anticipated improving market conditions to fully take effect and for newly identified land to come forward through the planning process. The consequences of this and the impact on maintenance of the 5 year land supply will only be fully apparent subject to future monitoring of the housing land supply. This will set the context for the next development plan and may signal the need for remedial action through that process as soon as possible. In the meantime Policy Hou 1 provides a mechanism to bring forward additional land if the 5 year supply is not maintained.

Other housing matters raised in representation.

103. The housing target as established by SESplan for market and owner occupied housing applies irrespective of tenure with the expectation that the land supply should provide for a range and choice of housing including housing for rent. This is a land use plan and I do not consider that it would be appropriate to distinguish a particular rented housing requirement given that this is likely to vary considerably over time to reflect current market conditions. I am content that the matter is sufficiently addressed by commitment to housing development of all tenures as expressed through Policy Hou 2.

104. I understand that work is progressing on proposals for the redevelopment of the Royal Victoria Hospital Site. The plan makes provision for such sites (referred to as windfall sites) within the urban area to come forward where consistent with the relevant plan policies. As a site within the urban area this development would count towards the housing target given that the council relies on an estimated contribution from such sites coming forward over the plan period.

105. I note concern regarding the lower quality of place and the greater need for

improvement in certain areas of the city and the need to give priority to these areas. However I consider that this matter is addressed by the strategy of the plan and its aim to create strong, sustainable and healthier communities (part 1, paragraph 11) and to support the City's Economic and Housing Strategy (Part 3, paragraphs 55 and 66).

106. My recommended changes reflect the importance placed on ensuring that new development addresses any identified deficiencies in infrastructure subject to consistency with the guidance set out in Circular 3/2012 Planning Obligations and Good Neighbour Developments. Paragraph 119 refers to site briefs and developer guidelines and these have an important role in clarifying such developer requirements.

107. My conclusion above is that the main items of additional infrastructure referenced in the Action Programme should have a clear basis in the plan. In this respect I agree that it would be consistent to apply the same text to housing release elsewhere in the city as is currently included for West and South East Edinburgh. I have also included additional text through Issue 21. Our assessment of specific sites includes conclusions on schools, including secondary schools, and other infrastructure provision and these matters are further addressed through Issue 21. Health care and other community facilities are also important and are addressed through Hou 10. However my conclusions on Issue 21 accept that such provision may rely on other mechanisms rather than specifically on developer contributions as no current assessment has been made of the need for such provision or the scale of any required contributions.

108. Sites with planning permission prior to the publication of the 2015 housing land audit will have been taken into account in the calculation of the housing land supply. Other sites may count towards the assumed windfall requirement. The site referred to as Ravelrig Balerno is referenced in my table 9 above and recommended for inclusion in Table 4 of the proposed plan along with other sites in South-East Edinburgh which have also progressed through the planning process. These should now contribute to the effective housing land supply (see also Issues 14 and 16) subject to detailed programming to be agreed through the audit process.

109. Scottish Planning Policy paragraph 119 explains that local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. The glossary definition in Scottish Planning Policy does not reference 5 years but rather the period under consideration: "The part of the established housing land supply which is free or expected to be free of development constraints in the period under consideration and will therefore be available for the construction of housing." Consequently, I do not recommend any change to the glossary definition bearing in mind that this does not negate the separate although related requirement to maintain a 5 year effective land supply at all times.

110. The Capital Coalition Motion forms part of the examination documents and the relevant sections are included in the council's schedule 4's. The committee expressed a view that there was some merit in certain representations which might point to a change to the plan. However, these issues are in any event subject to examination and all the issues raised in representation have been carefully considered. The plan once adopted should provide a clear locational strategy and site specific proposals to accommodate the growth identified through SESplan. I consider that the suggestion in representations that the plan should include reference to possible alternatives would be ambiguous and lead

to uncertainty contrary to the objectives of development planning.

111. SESplan recognises the role of Strategic Development Areas but also accepts the need for housing land release elsewhere in the city if the housing target is to be met. South-West Edinburgh was identified to meet some of this identified need to provide a range and choice of sites throughout the city as well as through brownfield land and within the Strategic Development Areas. It may be that financial incentives are required to enable delivery of the city's brownfield resource but there is no firm commitment to this and I must rely on the evidence to the examination that the water-front is unlikely to deliver significant housing to meet the target in the short to medium term. Drawing on the site specific assessment of sites elsewhere in this report I find no reason to conclude that sites in South-West Edinburgh should be excluded from the plan.

112. Representations question the lack of a separate target for affordable and market housing by housing market area. I recognise this approach is established through Scottish Planning Policy(SPP). However this local development plan is required to be consistent with SESplan and it predates the current SPP approach. I do not consider it would be appropriate for this local development plan to redefine the targets established through SESplan or to take a different approach. These will be matters for the next development plan to address. One representation suggests that the plan should be put on hold until revised SESplan estimates are published. However this plan is prepared in the context of the current strategic plan and its timeous adoption is required to deliver the approved strategy.

113. A number of representations seek changes to the Housing Land Study. These matters, as far as they relate to the plan, are addressed above. However changes to supporting documents fall outwith the remit of this examination.

Reporter's recommendations:

1. For consistency with West Edinburgh and South East Edinburgh add new sentence at the end of paragraph 119: "All proposals will be required to make appropriate contributions to new and improved infrastructure as detailed in Part 2 section 1 of the proposed plan."

2. Delete paragraph 63-65 and replace with:

63. The rate at which housing sites are developed is constrained by a variety of factors including market conditions. SESplan accepts that the required housing targets will be challenging to deliver. It stresses the importance of ensuring growth is accompanied by the appropriate infrastructure. It also requires greenbelt release to be minimised. Current programming assumptions are subject to consultation with the house-building industry and are monitored and updated through an annual housing land audit.

64. Figure 7 shows the current programming assumptions (drawing on the 2015 housing land audit) for existing sites and new sites as identified through this plan. Alternate figures presented by the house-building industry assume a more significant on-going shortfall extending over the plan period and beyond. There has been a recent increase in completions and the council considers it has identified land with sufficient total capacity overall. However, table 7 signals a shortfall in the effective housing supply to 2019 and potential on-going difficulties in maintaining a 5 year land supply.

Replace Figure 7 as below:
Current Anticipated programming of the Housing Land Supply (November 2015).

	2015-2019	2019-2024	Remainder 2024- 2026*	Total 2015-2026
Remaining SESplan Supply Target from 2015.	15,034	7210	2884	25128
Plus 10% to ensure generosity	**16,537**	**7931**	**3172**	**27640**
Effective supply	6410	4774	1490	12674
Contribution from sites capable of becoming effective	0	2324	826	3150
Windfall	1694	2116	846	4656
Total supply from existing sources (derived from 2015 HLA)	8104	9214	3162	20480
Required New LDP allocation	8433	-1283	10	7160
Brownfield	221	519	75	815
West Edinburgh SDA	175	1400	400	1975
South East Edinburgh SDA	756	1396	280	2432
Outwith SDA	162	1080	288	1530
Total new LDP allocations	1314	4395	1043	6752
Estimated shortfall	7119	-5678	-1033	408

65. Figure 8 shows additional sites, as included in Table 4, which are also identified for inclusion in the plan to assist in meeting the SESplan housing target. They are not currently accounted for in Table 7 as an assumed programming remains to be established through the annual audit process.

Figure 8 Additional capacity from existing and new sites.

Site	Approximate Additional Capacity
Gilmerton Station Road HSG24	160
Ravelrig Road Balerno	120
Edmonstone	170
The Wisp	71
Lang Loan	220
Total additional potential	**742**

66. The council has a clear role in working with developers and other agencies to ensure that there are no land use planning barriers to an increased take up of its identified stock of housing land. This will be facilitated through Supplementary Guidance to set out a realistic approach to enabling infrastructure provision taking into account financial viability and looking at innovative approaches to forward and gap funding. This will be particularly important if the considerable potential of the water-front is to be realised.

67. It may take time for any increase in the uptake of the identified land supply and this may create pressure for the release of additional land through Policy Hou 1. However any shortfall in the housing land supply, whilst carrying considerable weight, does not over-ride other considerations such as directing development to sustainable locations, securing green belt objectives and the appropriate provision of infrastructure.

68. The current housing target is based on a ten year period and the development plan is to be reviewed every five years. The process of preparing a new SESplan is already underway and the plan will be due for replacement in 2018. An early review of this local development plan is proposed in order to ensure a timeous response to any revised strategic housing target and to secure an ongoing and sufficient supply of housing land.

Note: Other relevant recommendations include: a new Policy Hou 1 (Issue 23), revision to the developer contributions policy Del 1 (Issue 21), inclusion of General Principles for transport and schools provisions within specific development areas (Issue 21) and a new policy to address cumulative and cross boundary transport matters Trans X (Issue 19)

Issue 5 - Housing and Community Facilities General
Appendix A - Progress on sites identified in Housing Land Study (HLS) June 2014

Table 1: 'Potential sites' (identified in HLS) now included in Housing Land Audit 2014 (at 31 March 2014)

HLS ref	HLA ref	Address	Developer	UNITS - HLA	UNITS - HLS	Completed	Application ref	Decision Date	Under Construction
31	5274	Broomhouse Crescent	Cruden Homes (East) Ltd.	97	68	0	13/00195/FUL	12-Sep-13	31-Mar-14
47	5379	Station Road	WPH Developments ltd.	32	39	0	13/01606/FUL	21-Mar-14	
60	5374	Westfield Avenue	Hart / Dunedin Canmore HA	60	60	0	12/01415/FUL	17-Jan-14	31-Mar-14
76	5289	Duddingston Park South	Clockwork Properties Ltd.	186	199	0	13/00040/FUL	22-Jan-14	
139	5370	West Bowling Green Street	J Smart & Co (Contractors) Plc.	114	114	0	12/01840/FUL	14-May-13	
149	5270	Bellevue Road	New Age Developers Ltd.	19	22	0	12/04302/FUL	26-Sep-13	31-Mar-14
150	5280	Canonmills Bridge	Glovart Holdings Ltd.	9	9	0	09/00830/FUL	08-May-13	
262	5277	Burdiehouse Road	Edenlaw Midlothian Ltd.	28	5	0	09/03244/FUL	06-Dec-13	
283	5314	Kinnear Road	Kinnear Road Ltd.	15	15	0	12/01113/FUL	17-May-13	31-Mar-14
284	5323	Malta Terrace	S1 Developments.	11	11	0	12/04044/FUL	14-Jun-13	
285	5324	McDonald Road	Foremost Properties (Scotland) LLP.	67	67	19	12/03518/FUL	03-Jun-13	31-Mar-14
286	5300	Fort House	The City Of Edinburgh Council.	94	110	0	12/04268/FUL	30-May-13	
287	5310	Greenbank Drive	BT Plc.	9	12	0	12/04263/FUL	21-Oct-13	
288	5373	West Mill Road	CALA Management Ltd &	15	22	0	11/03175/FUL	25-Oct-13	31-Mar-14
Total				**756**	**753**				

Table 2: 'Potential sites' (identified in HLS) with consent since 31 March 2014 at January 2015

HLS ref	Address	Units - new app	Units - HLS	Application ref	Decision date
26	Niddrie Mains Road	66	30	14/01820/FUL	16-Dec-14
52	Liberton Gardens	297	200	14/00577/AMC	08-Oct-14
105	Ravelston Terrace	32	40	13/02957/FUL	09-Jun-14
176	Craigmount Brae	44	42	13/03817/FUL	14-Mar-14
251	Balmwell Terrace	43	15	13/05171/FUL	08-Jul-14
261	Harvesters Way	183	300	13/02640/FUL	28-Apr-14
284	Malta Terrace	8	11	14/00852/FUL	25-Apr-14
Total		**398**	**352**		

Table 3: 'Potential sites' (identified in HLS) with new applications/decision pending at January 2015

HLS ref	Address	Units - new app	Units - HLS	Application ref
67	McLeod Street	25	33	14/04948/FUL
82	Dalgety Road	52	33	14/03883/FUL
92	Horne Terrace	16	33	14/03752/FUL
111	Brunswick Road	175	165	14/03940/FUL
128	Eyre Terrace	70	22	14/01177/PPP
131	Annandale Street	60	66	14/04044/FUL
Total		**398**	**352**	

Table 4: Sites recorded as constrained in Housing Land Audit (HLA) 2013 recorded as effective in HLA 2014

HLA REF	Address	Developer	Units	Application ref	Decision date	Under construction
3105.5	West Shore Road	Persimmon Homes East Scotland.	32	12/04568/FUL	06-Aug-13	31-Mar-14
3424.6	Western Harbour View	AB Leith Ltd.	258	13/00498/FUL	13-May-13	
3750	RWELP HSP 6: Craigpark Quarry	Craigpark Partnership.	117	05/01229/FUL	11-Aug-06	
3762	RWELP HSG 5: Stewart Terrace	Lp Site	117	14/01509/PPP		
4171	Liberton Road	McCarthy And Stone Retirement Lifestyle	48	12/04342/FUL	27-Aug-13	31-Mar-14
4638	ECLP CA2: Calton Road (Caltongate)	Mountgrange (Caltongate) Ltd.	36	07/00560/FUL	30-Oct-08	31-Mar-14
4819	Tenant Street	Silverfields LLP	49	13/04405/FUL	12-Jan-15	
4942	Ferrymuir	Bellway Homes	130	14/04172/FUL		
Total			**787**			

Table 5: Constrained sites in Housing Land Audit 2014 with new consents (since 31 March 2014) at January 2015

HLA REF	Address	Developer	Units	Application ref	Decision date
5132	LDP HSG 4: West Newbridge	Lp Site	490	07/04646/OUT	08-Sep-14
1000	RWELP HSG 1: Kinleith Mills	Treetops Development Company.	89	12/04126/PPP	09-Apr-14
3761	RWELP HSG 3: Baird Road	Lp Site	2	07/00442/FUL	29-Apr-14
4728	Groathill Road South	Ciji Properties.	11	14/00026/FUL	24-Nov-14
4503	Burdiehouse Road	BJ Hendry	18	14/00336/FUL	25-Jun-14
4635	Broughton Street Lane	Prosper Holdings Ltd.	11	13/01217/FUL	22-Apr-14
Total			**621**		

Table 6: Constrained sites in Housing Land Audit 2014 with new applications/decisions pending at January 2015

HLA REF	Address	Developer	Units - new app	Application ref
4793	St James Centre	Henderson Global Investors.	138	14/02070/AMC
1000	RWELP HSG 1: Kinleith Mills	Treetops Development Company.	89	14/03079/AMC
5027	London Road	Caledonian Trust Plc.	81	14/05174/PPP
4793	St James Centre	Henderson Global Investors.	20	14/05147/FUL
4793	St James Centre	Henderson Global Investors.	0	14/05263/AMC
Total			**328**	

Issue 5 - Housing and Community Facilities General
Appendix B – Alternative Table 7 – Programming

Site Name /Address	LDP mid points	Expected Completions						
		14/15	15/16	16/17	17/18	18/19	*Total 14-19*	*Total 19-24*
West SDA								
LDP Emp 6 IBG	350	0	0	50	50	50	150	200
LDP HSG 19: Maybury	1,850	0	50	100	150	150	450	1,400
LDP HSG 20: Cammo	600	0	0	50	100	100	250	350
TOTAL WEST SDA	**2,800**						**850**	**1,950**
South East SDA								
LDP HSG 21: Broomhills	**510**	0	0	22	40	40	102	408
LDP HSG 22: Burdiehouse phase 2	180	0	0	30	56	45	131	49
LDP HSG 23: Gilmerton Dykes Road	60	0	30	30	0	0	60	0
LDP HSG 24: Gilmerton Station Road	420	0	20	50	50	100	220	200
LDP HSG 25: The Drum	150	0	0	25	50	50	125	25
LDP HSG 26: Newcraighall North	180	0	40	40	69	31	180	0
LDP HSG 27: Newcraighall East	330	0	0	25	25	50	100	230
LDP HSG 29: Brunstane	1,140	0	0	0	50	50	100	1,040
LDP HSG 30: Moredunvale Road	185	0	0	0	25	25	50	135
TOTAL SE SDA	**3,155**						**1,068**	**2,087**
Outwith SDA								
LDP HSG 35: Riccarton Mains Road	30	0	0	15	15	0	30	0
LDP HSG 31: Curriemuirend	165	0	0	0	25	25	50	115
LDP HSG 32: Builyeon Road	840	0	0	0	50	50	100	740
LDP HSG 33: South Scotstoun	440	0	0	0	40	50	90	350
LDP HSG 34: Dalmeny	15	0	0	0	15	0	15	0
LDP HSG 36: Curriehill Road	60	0	0	0	30	30	60	0
LDP HSG 37: Newmills Road, Balerno	210	0	0	0	50	50	100	110
TOTAL ELSEWHERE	**1,760**						**445**	**1,315**
New Brownfield Allocations								
South Gyle Broadway		0	27	36	58	32	153	47
LDP Del 5 Edinburgh Park	575	0	0	0	50	50	100	275
LDP HSG 28 : Ellen's Glen Road	240	0	0	0	30	50	80	160
	815						**333**	**482**
Total New LDP Allocations	**8,530**						**2,696**	**5,834**

Issue 5 – Housing and Community Facilities General																								
Appendix C - Notional Programming of Additional Sites Promoted by Representations																								
Housing Land Representation Analysis																								
Developer	**Representation Code**	**Site Location**	**Site Size (ha)**	**Site Capacity (Units)**	**Delivery Timescale**	**Associated Documents**	**15/16**	**16/17**	**17/18**	**18/19**	**19/20**	**20/21**	**21/22**	**22/23**	**23/24**	**24/25**	**25/26**	**26/27**	**27/28**	**28/29**	**29/30**	**30/31**	**31/32**	**32/33**	**33/34**
Danzan 2003 (Holder Planning)	01133	Kirkliston East	46	500	N/A	N/A			50	50	100	100	100	100											
Foxhall Trust (GVA)	01155	Factory Field, Kirkliston	5	100	N/A	N/A			50	50															
Hallam Land Management	02277	North East of Craigiehall	80	1000	Sort and Medium term, 250 houses in first instance	Craigiehall Village Concept			50	50	50	100	100	100	100	150	150	150							
Defence Infrastructure Organisation	02291	Cragiehall	38.5	200					50	50	50	50													
Lafarge Tarmac	02131	Harvest Road	0.4	12					12																
Lafarge Tarmac	02131	South of Harvest Road	2.8	70					20	25	25														
Lafarge Tarmac	02131	West of Baird Road	23.7	550	N/A				50	50	100	100	100	100	50										
David Wilson Homes and J & J Muir	00698	South of Freelands Road	50	180	Year 2017/2018 - 35 units, 2018/2019 - 35 units 2019/2020 - 25 units, 2020/2021 - 35 units,	David Wilson Homes and J & J Muir, Land East of Ratho			35	35	35	35	40												

					2021/2022 - 40 units																			
Murray Estates	02275	East of Ratho Station	5	100					50	50														
Colin Paton	02583	East of Ratho (land at Ashley House)	5	10					10															
Royal Bank of Scotland (GVA)	02272	Turhouse Golf Course	N/A	45	N/A				20	25														
Wallace Land Investments and Management	02281	Riccarton South and West	123.7	1500	850 to 2024 (phase 1) and 650 post 2024 (phase 2)	Riccarton Village Form 9			50	100	100	150	150	150	150	150	150	150	150	50				
CALA/Miller	00685	Currievale	30	420	Start Construction April 2017: April 2018- 25th completion, April 2019- 85th completion, 2020- completion, 2020- 145th completion, 2021- 235 completion, April 22- 325 completion, April 23- 410th completion	Currievale site submission on behalf of CALA Management Ltd- October 2014			25	60	60	90	90	85	10									
CALA	00685	Riccarton Garden Centre	9	110	April 2017- Site Start, April 2018- 30th completion, April 2019- 60th completion, April 2020, 90th completion, April 2021- 110th completion	Currievale site submission on behalf of CALA Management Ltd- October 2014			30	30	30	20												

Gladman Developments	02276	Ravelrig Road	14	120	25 and 30 units/ year (i.e. 4 – 5 year build out project).	Planning Statement			30	30	30	30												
Lord Dalmeny	02272	Harlaw Gate	4.78	45					20	25														
Mr and Mrs Philip and BDW Homes	02280	Cockburn Crescent	12.5	280	Anticipated housing completions will be achieveable in 2016	Cockburn Crescent Site Brief		30	50	50	50	100												
Taylor Wimpey	02251	Muir Wood Road	9.6	250	N/A				50	50	50	50	50											
CALA	01154	Craigcrook Road	7.75	35	N/A	N/A			35															
Boland Properties (Colliers)	01463	Ravelston Quarry	2	4	Within 5 years				4															
Blackford Hill Ltd.	02244	Midmar Paddock	4.1	10	N/A	N/A			10															
Miller Homes	02416	Winton Gardens	4.3	50					25	25														
CALA	02691	Frogston Road West	2.8	18					9	9														
Ogilvie Homes	02703	Duddingston Golf Course	0.9	30	N/A	N/A			15	15														
Ogilvie Homes		Duddingston Golf Club	0.5	15					15															
Cala	02691	Mortonhall Army Camp		100					50	50														
BW Trading Ltd.	00755	South of Frogston Road East	5.9	165	N/A	N/A			50	50	50	15												
McTaggart and Mickel Homes	02246	West of Liberton Brae	1.5	40	N/A				20	20														
McTaggart and Mickel Homes	02246	West of Liberton Brae	7.1	170	N/A				20	50	50	50												
Land Options East (Derek Scott Planning)	01202	South of Liberton Drive	3.35	70	N/A	N/A			35	35														
McTaggart and Mickel Homes	02246	Station Road	N/A	200	States current site boundary should be extended to accommodate level of development				50	50	50	50												

SEEDCO (Holder Planning)	02421	Drum North and South		2500					50	50	100	100	150	150	150	150	200	200	200	200	200	200	200	200	
Hallam Land Management	02279	East of Burdiehouse	N/A	120					50	50	20														
Springfield Properties	02265	South East Wedge North	2.29	70	Within 5 years				35	35															
Wallace Land Investments and Management	02281	North of Lang Loan	12.7	220	4 year development period	Lang Loan Development Framework			55	55	55	55													
Wallace Land Investments and Management	02281	North of Gilmerton Station	12.5	160	3 year development period	Lasswade Road Development Framework			50	50	60														
Sheratan Ltd	02408	South East Wedge South	36.4	400	N/A	N/A			50	50	100	100	100												
Yeoman McAllister	02085	Part of site below			Part of site below																				
Stewart Milne Homes	02278	Ratho Park Road/South of Ratho Park Road	35.8	350	N/A				50	50	100	100	50												
Murray Estates	02275	District East of Milburn tower		1000	Complete by year 11	Murray Estates appendix 1. LDP MiR Submission			50	50	100	100	100	100	100	100	100	100							
Murray Estates	02275	EGD West		1100	Complete by year 11	Murray Estates appendix 1. LDP MiR Submission			50	50	100	100	100	100	100	100	100	150	150						
Murray Estates	02275	EGD South		1400	Complete by year 11	Murray Estates appendix 1. LDP MiR Submission			50	50	100	100	100	150	150	150	150	200	200						
				13719																					
Output	Up to 2019	3034																							
	2019 to 2024	6235																							
	Beyond 2024	4450																							
	TOTAL	**13719**																							

Programming assumptions																								
1. Assumed programming assumptions supplied in rep.																								
If no timescale in rep:	Under 100 units	Spread programming out over 2 to 3 years																						
	100 to 200 units	1 developer, Programme as 50,50,50,50																						
	200 to 500 units	1 developer, Programme as 50,50,100,100,100,100																						
	500 to 1000 units	2 developers, Programme as 50,50,100,100,100,100,...																						
	1000 to 2000 units	2 developers, programme as 50,50,100,100,100,100,150,150,150,...																						
	200 units +	3 developers, programme as 50,50,100,100,150,150,150,150,200,200,...																						

Issue 6	**Existing Housing Proposals**	
Development plan reference:	**Part 1 Section 3 Table 3 pages 22- 25 Proposals Map**	**Reporter:** Richard Bowden Allison Coard

Body or person(s) submitting a representation raising the issue (including reference number):

0364	Craigleith/Blackhall Community Council	1501	British Airways PLC
0434	Miriam Prais	2086	Persimmon Homes (East Scotland)
0495	David and Violet Donnelly	2249	D Buntin
0552	Tony Jones	2536	Parc Craigmillar Ltd
0553	Pat Jones	2551	Ken Kirkcaldy
0631	Ann Morrison	2563	Royal Zoological Society of Scotland
0716	Denise Havard	2658	J S Dogra
0717	Lindsay Agnew	2694	R J Knops
1098	Barbara Mathieson	2699	Scottish Environment Protection Agency
1121	Bill and Marjorie Douglas		

Provision of the development plan to which the issue relates:	This section of the Plan identifies sites that already have planning permission and/or were identified in previous local plans and have been carried into the LDP. These are listed as Proposals HSG 1 – HSG 18 in Table 3 of the Plan.

Planning authority's summary of the representation(s):

CONTEXT

Chapter 3 of the Main Issues Report sets out the Councils proposed approach. Table 3 in the Plan provides information on housing sites of varying sizes and character located across the city. They relate to sites which already have planning permission for housing development or were identified as housing proposals in previous local plans.

<u>HSG 1 Springfield & HSG 2 Agilent</u>

- Representations to HSG 1 and HSG 2 form part of wider representations made to new housing allocations in the plan. They are concerned with the cumulative impact arising from Housing Proposals HSG 19, HSG 20, HSG 32, HSG 33 and HSG 34. These representations object on the grounds of the following reasons:
  - Transport infrastructure including concerns regarding traffic congestion, pollution, rat-running on surrounding roads, impact on road safety and the requirement for a comprehensive traffic assessment to look at the cumulative effect of adjacent developments
  - Impact on school infrastructure and capacity of existing schools.
  - Loss of greenbelt and use of brownfield sites

(0364 Craigleith/Blackhall Community Council; 0552 Tony Jones; 0553 Pat Jones; 0716 Denise Havard; 0717 Lindsay Agnew; 1098 Barbara Mathieson; 2249 D Buntin; 2551 Ken Kirkcaldy; 0495 David and Violet Donnelly)

- Concerned that the scale of housing will have major implications for existing

communities on the west side of the city, leading to a significant increase in traffic on Queensferry Road and other major routes in the area. Requests the requirement for far more effective remedial measures to address increased traffic flows on Queensferry Road in order to maintain the environmental and accessibility qualities appropriate to the existing Blackhall and Craigleith communities. This needs to be linked more effectively to both the Local Transport Strategy and current 20mph consultation paper. **(0364 Craigleith/Blackhall Community Council)**

HSG 1 Springfield - Other Matters

- States that an inconsistent site reference is used, as 'Springfield' does not appear in the Environmental Report with 'East of Headrigg Road' shown instead. **(0552 Tony Jones; 0553 Pat Jones; 0716 Denise Havard; 0717 Lindsay Agnew)**
- Objects to the reference to link road from Bo'ness to Society Road on the grounds of increase noise, nuisance and disturbance arising from increased traffic. States that Transport Scotland advised previously that creation of Society Road link to Springfield development site was dangerous. **(1098 Barbara Mathieson; 0631 Ann Morrison; 2249 D Buntin)**
- Part 1 Section 5 in the Plan does not include detailed information about the approved proposal at HSG 1 and does not account for major works currently being undertaken in connection with the new Queensferry Crossing. Suggests works should be identified on the proposal map and site boundary adjusted accordingly. States a fresh application is required to consider the up-to-date environmental impacts of the bridge and its approach roads along western edge of the site. **(2551 Ken Kirkcaldy)**

HSG 2 Agilent - Other Matters

- Reduce the number of houses from 450 to150-200 and address parking issues at Dalmeny Station. **(0495 David and Violet Donnelly)**

HSG 4 West Newbridge

- Objects to proposal on the grounds of noise issues associated with Edinburgh Airport and because the site is allocated on land within Edinburgh Public Safety Zone. **(1501 British Airways PLC)**
- As the site is located within functional plain or area of known flood risk reference is required to an adequate flood risk assessment in Table 3 of the Plan. **(2699 Scottish Environment Protection Agency)**

HSG 5 Hillwood Road, Ratho Station

- Concerned about the location of HSG 5. Housing in close proximity to Edinburgh Airport should be avoided due to noise impact giving rise to significant adverse impacts to health and quality of life within the development. **(1501 British Airways PLC)**
- As the site is located within functional plain or area of known flood risk reference is required to an adequate flood risk assessment in Table 3 of the Plan. **(2699 Scottish Environment Protection Agency)**

HSG 6 South Gyle Wynd

- Suggests that previous planning permission across sites should be considered to take account of differences in coverage between numbers expected by Edinburgh Council and numbers actually achieved by developers. **(2086 Persimmon Homes (East Scotland))**

HSG 7 Edinburgh Zoo

- Believes the density of proposal is too high and will result an adverse increase in noise and disturbance associated with singular access on Old Kirk Road and Kaimes Road. **(0434 Miriam Prais)**
- Objects on the grounds of non-compliance with Policy Env 6 as Corstorphine is a designated conservation area in the Plan. Considers that the proposal will not preserve or enhance the character of the area. **(1121 Bill and Marjorie Douglas)**
- Seeks a significant reduction in housing capacity for HSG 7 on the grounds of loss of green belt and wildlife habitat. Seeks a reduction in density to 30 low rise houses in accordance with the Reporter's original 2009 recommendations. **(2694 R J Knops)**
- Supports the continued identification of land on the western edge of the Zoo as a housing allocation (HSG 7) in the Plan. **(2563 Royal Zoological Society of Scotland)**

HSG 14 Niddrie Mains

- PARC has submitted an updated masterplan for Craigmillar alongside a planning application for Planning Permission in Principle. HSG 14 will now accommodate the replacement of Castlebrae High School so reference to this should be included, as shown in a revised Craigmillar Masterplan (2014). **(2536 Parc Craigmillar Ltd)**
- With regards to 23 Niddrie Mains Drive, this land is identified as green space in the proposed plan with no detail of landownership. Seeks amendment of the Plan to show that it is in sole ownership of J S Dogra. **(2658 J S Dogra)**

HSG 17 Greendykes & HSG 18 New Greendykes

- As the site is located within functional plain or area of known flood risk reference is required to an adequate flood risk assessment in Table 3 of the Plan. **(2699 Scottish Environment Protection Agency)**

Modifications sought by those submitting representations:

HSG 1 Springfield & HSG 2 Agilent

- Remove proposal from the Plan. **(0364 Craigleith/Blackhall Community Council ; 0552 Tony Jones; 0553 Pat Jones; 0716 Denise Havard; 0717 Lindsay Agnew; 1098 Barbara Mathieson; 2249 D Buntin; 2551 Ken Kirkcaldy; 0495 David and Violet Donnelly)**
- Seeks far more effective remedial measures to address increased traffic flows on Queensferry Road which needs to be linked more effectively to both the Local Transport Strategy and current 20mph consultation paper. **(0364 Craigleith/Blackhall Community Council)**

HSG 1 Springfield - Other Matters

- Use consistent site reference as 'Springfield' does not appear in Environmental Report with 'East of Headrigg Road' shown instead. **(0552 Tony Jones; 0553 Pat Jones; 0716 Denise Havard; 0717 Lindsay Agnew)**
- Remove reference to proposed link road from Bo'ness Road to Society Road in Table 3. **(1098 Barbara Matheson; 0631 Ann Morrison; 2249 D Buntin)**
- With reference to HSG 1, permission on this site was approved but material changes have since occurred. A fresh application should be submitted to take account of full impact. The works should be identified on the map and the site boundary adjusted accordingly. **(2551 Ken Kirkcaldy)**

HSG 2 Agilent - Other Matters

- Reduce the number of houses from 450 to150-200 and address parking issues at Dalmeny Station for commuters. **(0495 David and Violet Donnelly)**

HSG 4 West Newbridge

- Remove proposal from the plan. Public Safety Zones are identified to control the number of people at risk of death or injury in the event of an aircraft accident on take-off or landing. Considers that this land should remain protected from future developments. **(1501 British Airways PLC)**
- With reference to HSG 4, requests the LDP to amend comments to include the following description 'The finalised site capacity, design and layout should be informed by an adequate flood risk assessment'. **(2699 Scottish Environment Protection Agency)**

HSG 5 Hillwood Road, Ratho Station

- Remove the proposal from the plan. Concerned the site will be subject to noise issues associated with Edinburgh Airport. **(1501 British Airways PLC)**
- With reference to HSG 5, amend Table 3 of the Plan to include the following description 'The finalised site capacity, design and layout should be informed by an adequate flood risk assessment'. **(2699 Scottish Environment Protection Agency)**

HSG 6 South Gyle Wynd

- With reference to HSG 6, this site has approved planning permission for 204 units and should be noted in the Plan. **(2086 Persimmon Homes (East Scotland))**

HSG 7 Edinburgh Zoo

- Concerned that the maximum capacity of building types and the distribution and density proposed is too high. Disturbance and noise arising from the proposals will impact on Old Kirk Road/ Kaimes Road. Requests that the tree line border is retained. **(0434 Miriam Prais)**
- Requests that all 82 acres of the zoo land, in its entirety, be designated as a conservation area. **(1121 Bill and Marjorie Douglas)**
- Seeks a significant reduction in housing capacity to 30 low rise houses. **(2694 R J**

Knops)

HSG 14 Niddrie Mains

- PARC has submitted an updated masterplan for Craigmillar alongside a planning application for Planning Permission in Principle (PPP). Reference to the site for the new school (SCH2) should be clarified as shown in a revised Craigmillar Masterplan (2014) immediately east and north of the Neighbourhood Hub facility. **(2536 Parc Craigmillar Ltd)**
- Amend plan to show that 23 Niddrie Mains Drive EH16 4PQ is sole ownership of J S Dogra and show this land as accessible for all supplies and services such as gas, electricity, drainage, pedestrian and vehicle towards this land. **(2658 J S Dogra)**

HSG 17 Greendykes & HSG 18 New Greendykes

- With reference to HSG 17 and HSG 18, requests the LDP to amend Table 3 to include the following description 'The finalised site capacity, design and layout should be informed by an adequate flood risk assessment'. **(2699 Scottish Environment Protection Agency)**

Summary of responses (including reasons) by planning authority:

HSG 1 Springfield & HSG 2 Agilent

Planning permission for HSG 1 was granted in 1994 (94/01859/REM). It is currently a housing proposal in the adopted Rural West Edinburgh Local Plan. It is identified as a constrained site until the completion of the Forth Crossing when it is expected that the site will be returned to parties to take forward for housing development. It is assumed that HSG 1 will become effective during the period from 2013 to 2024 as shown in Appendix 1of the LDP Housing Land Study.

Full planning permission has been granted for housing on HSG 2 (11/01162/FUL) for 450 units. Construction on this site has started. Consideration of housing numbers and traffic impacts were considered in the determination of the application.

HSG 1 and HSG 2 were not included in the LDP Transport Appraisal (Volumes 1 and 2, 2013, Addendum, 2014) as the 2011 Housing Audit considered ‘committed’ sites only and they were not established and effective at the time the baseline data was gathered. However, in paragraph 2.2.5 of the Transport Appraisal, it states that allowances were made for projected growth in traffic levels over and above up to 2019/20 and 2024/25. Nevertheless, a transport appraisal would be required as part of the planning application for HSG 1.

As part of the LDP process, the Council has prepared a Revised Education Appraisal June 2014 (corrected September 2014) which identifies the improvements to school infrastructure to deal with the net impact of new housing proposals in Queensferry. These Education actions are set out within the Council’s Proposed Action Programme, pages 37-39. For Builyeon Road, South Scotstoun and Dalmeny these actions include contributions towards a new Builyeon Road (ND) Primary School (SCH 10) with 60/60 nursery provision and additional capacity within both the non-denominational and denominational primary and high school estate. All

proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance. The location of the new primary school will be dealt with at the masterplan and planning application stage. The Council is currently seeking funding for a replacement Queensferry High School to be located on the existing site. The design of the new High School will allow for expansion to accommodate new pupils from the LDP sites when developer contributions become available.

HSG 1 and HSG 2 are not located in the green belt as designated in the adopted local plan.

No modification proposed.

(0364 Craigleith/Blackhall Community Council; 0552 Tony Jones; 0553 Pat Jones; 0716 Denise Havard; 0717 Lindsay Agnew; 1098 Barbara Mathieson; 2249 D Buntin; 2551 Ken Kirkcaldy; 0495 David and Violet Donnelly)

- As part of the Local Development Plan process, the Council has carried out a Transport Appraisal (Volumes 1 and 2, 2013, Addendum, 2014). This appraised the cumulative impact of the new developments proposed in the LDP, taking account of other factors. This identifies improvements to transport infrastructure to deal with the net impact of new housing proposals in Queensferry. These transport actions are set out in the Council's Proposed Action Programme on page 41. As part of a planning application, there will be a requirement for a transport appraisal to be submitted, which identifies any further mitigation measures.

The Council initiative to reduce the speed limit to 20mph on residential and shopping streets is separate to planning policy, using Speed Limit Orders and will come into effect from late 2015 onwards. This is a matter for implementation under roads legislation and outwith the scope of the Plan. No modification proposed. **(0364 Craigleith/Blackhall Community Council)**

<u>HSG 1 Springfield - Other Matters</u>

- 'East of Headrig' refers to a separate area defined in the Environmental Report for the purposes of assessing housing site options. The findings are summarised in Appendix 2 of Environmental Report. HSG 1 'Springfield' was not included in the assessment. No modification proposed. **(0552 Tony Jones; 0553 Pat Jones; 0716 Denise Havard; 0717 Lindsay Agnew)**
- Page 40 of the Action Programme under HSG 1 states 'opportunity to create a link road from Bo'ness Road to Society Road should be investigated'. Such an investigation would take into account of likely impacts. There has been no objection from Transport Scotland regarding the possible creation of road links for proposal HSG 1 'Springfield'. No modification proposed. **(1098 Barbara Mathieson; 0631 Ann Morrison; 2249 D Buntin)**
- There is no legal remit to submit a fresh planning application. Accordingly, any future planning proposals will be determined based on their own individual merits. They are required to have regards to the provisions of the development plan and to any other material considerations. No modification proposed. **(2551 Ken Kirkcaldy)**

HSG 2 Agilent - Other Matters

- As part of the Local Development Plan process, the Council has carried out a Transport Appraisal. (Volumes 1 and 2, 2013, Addendum, 2014) This appraised the cumulative impact of the new developments proposed in the LDP, taking account of other factors. This identifies improvements to transport infrastructure to deal with the net impact of new housing proposals in North West Edinburgh. These transport actions are set out in the Council's Proposed Action Programme pages 40-41. The Action Programme identifies on page 41 a specific action to enhance car parking capacity at Dalmeny Station by adding a new level. The detail of these actions is being established through transport assessments required at the planning application stage. All relevant proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance. **(0495 David and Violet Donnelly)**

HSG 4 West Newbridge

- Outline planning permission for HSG 4 'West Newbridge' was granted in 2014 (application ref: 07/04646/OUT). It is a housing proposal in the Rural West Edinburgh Local Plan. Reference to aircraft noise constraint is highlighted in Table 3 in the Proposed LDP. Future proposals are required to address this through a comprehensive masterplan for this whole site and accord with the West Edinburgh Strategic Design Framework. No modification proposed. **(1501 British Airways PLC)**
- The need for a flood risk assessment is referred to in the supporting text for Policy Env21 Flood Protection. It is considered not necessary to repeat this for individual housing proposals. No modification proposed. **(2699 Scottish Environment Protection Agency)**

HSG 5 Hillwood Road, Ratho Station

- The Council is minded to grant planning permission to an application (10/02737/PPP) for HSG 5. The site is a housing proposal in the Rural West Edinburgh Local Plan. Potential impact of aircraft noise will be required to be addressed as part of a planning application and proposals should accord with the West Edinburgh Strategic Design Framework. No modification proposed. **(1501 British Airways PLC)**
- The issue of flood risk for all developments, not just LDP proposals is addressed through Policy Env 21. No modification proposed. **(2699 Scottish Environment Protection Agency)**

HSG 6 South Gyle Wynd

- It is noted that planning permission for HSG 6 was granted in 2014 (application ref: 13/05183/FUL) for 204 units and this exceeds the capacity range as indicated in the Edinburgh City Local Plan. It is considered not necessary to modify the capacity range in Table 3 to reflect the numbers actually achieved through a grant of planning permission. The aim of the Plan is to ensure that opportunities for development on sites listed in Tables 3 and 4 and any other site emerging during the period of the plan are assessed on their own individual merits. Actual completions are monitored through the annual Housing Land Audit. No modification proposed. **(2086 Persimmon Homes (East Scotland))**

HSG 7 Edinburgh Zoo

- HSG 7 is a housing proposal in the Edinburgh City Local Plan. Its allocation was considered through the ECLP inquiry. The site is to retain greenbelt designation to reflect the particular circumstances of the site. It is considered that a capacity of 80 houses is appropriate for its context. No modification proposed. **(0434 Miriam Prais)**
- A review of Corstorphine Conservation area is not considered in the preparation of this plan. The site is within the green belt, and Special Landscape Area. A planning application will be assessed against the relevant policies in the Plan including Policy Env 11. No modification proposed. **(1121 Bill and Marjorie Douglas)**
- The significant environmental effects were assessed as part of the accompanying Environmental Report and there have been no significant changes to justify the reassessment of this site. No modification proposed. **(2694 R J Knops)**

HSG 14 Niddrie Mains

- It is noted that no application for the location of proposal SCH 2 has been submitted to indicate the exact location of new high school. The location of the school will be required to accord with the Craigmillar Urban Design Framework. No modification proposed. **(2536 Parc Craigmillar Ltd)**
- With regards to 23 Niddrie Mains Drive, details of land ownership are not matters for the planning system to address. No modification proposed. **(2658 J S Dogra)**

HSG 17 Greendykes & HSG 18 New Greendykes

- The issue of flood risk for all developments, not just LDP proposals is addressed through Policy Env 21. No modification proposed. **(2699 Scottish Environment Protection Agency)**

Reporter's conclusions:

General

1. The housing land requirement is set out in the strategic plan for the area - SESplan. Its associated supplementary guidance- Housing Land November 2014 breaks down the requirement for each of the council areas including the City of Edinburgh. There is a statutory requirement for this local plan to demonstrate consistency with SESplan. In this context the proposed plan must identify a corresponding supply of housing land, which should be effective or capable of becoming effective over the plan period.

2. These matters are assessed in more detail in the conclusions section of Issue 5. I recognise the importance of the city's significant brownfield resource in providing future housing and enabling regeneration of the waterfront and other areas. However, I also accept that given the extent of the housing land requirement combined by the often long lead in times and high costs of delivery associated with brownfield sites these would not alone achieve consistency with the strategic plan. The assessment undertaken through Issue 5 demonstrates the requirement for green field sites to contribute to the housing land supply particularly in the first five year period if the SESplan target is to be met.

3. The Strategic Development Plan for Edinburgh and South East Scotland (SESplan)

identifies 4 Strategic Development Areas (SDAs) in Edinburgh – to be the biggest areas of change over the 10 year plan period. As such these SDAs, which include West Edinburgh, are intended to provide the focus for new housing development, investment opportunities and job creation in locations that can demonstrate good accessibility to existing or planned public transport services. In line with the overall strategy, in addition to identifying significant development proposals in the SDAs, the new plan also seeks to support change in appropriate locations elsewhere - including through regeneration opportunities, redevelopment of vacant sites and use of empty commercial units, as well as through increasing densities of development.

4. SESplan Policy 9 requires local development plans to provide policy guidance that will require sufficient infrastructure to be available, or its provision to be committed, before development can proceed. The council's site assessment and the action plan, which has been prepared to accompany the proposed plan, seek to address these matters. However, there is understandable local concern about the sufficiency of these provisions and how and when they might be delivered.

5. SESplan through paragraph 130 states that local planning authorities should seek to minimise the loss of land from the Green Belt whilst balancing the need to achieve sustainability objectives. Where development in the green belt is required to achieve the strategy, effort should be made to minimise the impact on Green Belt objectives and secure long term boundaries. Scottish Planning Policy in paragraph 50 states that " In developing the spatial strategy, planning authorities should identify the most sustainable locations for longer-term development and, where necessary, review the boundaries of any green belt." Whilst the objective of retaining long term robust boundaries for the green belt applies the proposed plan must respond to the strategic development requirements as established through SESplan.

6. It is in the above context, and taking into consideration the conclusions and recommendations of Issue 5 of this report that I have assessed the merit of the representations referred to below. My focus is on the sufficiency of the plan rather on the assessment of whether any alternative site would be preferable to ones proposed by the council. My remit would only enable a recommendation to remove sites from the plan if I were to conclude that they were unacceptable when assessed against the relevant planning issues raised in a representation. The conclusions on Issue 5 and the identified shortfall in the land supply point to the need to add to the land supply. This conclusion would not support a scenario whereby one acceptable housing site was replaced by another, even if it were demonstrated to be preferable.

7. The sites being examined under this issue were selected through the council's assessment process. This established a range of criteria against which the suitability of sites for inclusion could be assessed and compared. The criteria used for the housing site assessment are set out in Tables 6 and 7 of the Environmental Report 2nd Revision (Volume 1). The council has assessed each of the sites selected and allocated in the plan - the statutory assessment of their likely environmental effects is set out in the Appendices of that report. In responding to the matters raised in representation on these sites I have drawn on these assessments along with the Habitat Regulation Appraisal and the council's action plan.

8. I note that each of the sites with unresolved representations under this particular issue heading have been identified by the council as existing proposals for housing development to be carried forward into the proposed plan. These sites are amongst the "existing housing

proposals" listed in Table 3 of the proposed plan - as a result of them either already having planning permission for housing development or identified as housing proposals in the previously adopted local plans (the City of Edinburgh Local Plan or the Rural West Edinburgh Local Plan). It is in this context that I now examine each of those sites allocated by the council that have become the subject of unresolved objections. These are considered in the order that they have been listed above.

HSG 1 Springfield and HSG 2 Agilent

9. I note that neither of these 2 sites – located on the western and southern fringes of Queensferry respectively - are within the green belt boundary shown in the adopted plan. A number of representations relating to each of the 2 sites raise similar concerns with regard to transport infrastructure, capacity of local schools and loss of green belt land if these sites were allocated in the plan and implemented for housing development.

10. I note from my site visits that site HSG 1 is an undeveloped, gently sloping area of rough pasture land. It is located between an existing residential area to the east and a new road corridor currently under construction to the west. That road will form part of the route leading to and from the new Queensferry Crossing bridge over the Forth estuary due for completion in 2016. Along the western edge of the HSG 1 site there has recently been major tree planting which will provide a screen and buffer strip between the site concerned and the adjoining new road corridor

11. The HSG 2 site leads south from an existing residential area and also adjoins the rail customer car park alongside Dalmeny railway station. This is a site with planning permission for 450 houses that is already under construction. Indeed its first phase was being actively developed by a major national housebuilder when I made my site visit. In this context it is neither necessary nor appropriate for me to consider the merits of site HSG 2 further in any detail as its implementation is already legally consented and it is proceeding towards implementation. Accordingly my assessment below is concerned essentially with site HSG 1, even though much of the associated documentation covers both sites.

Transport Infrastructure

12. Issue 19 of this report sets out a detailed assessment relating to the strategic transport infrastructure issues concerning this and other parts of the plan area – and I rely on its findings, conclusions and recommendations. The council has explained why the HSG 1 and HSG 2 sites were not included in its earlier Transport Appraisals (Volumes 1 & 2 March 2013 and Addendum June 2014) undertaken as part of the plan process. It also points out, however, that those appraisals did also make some allowance for additional growth over the plan period– which I take to include the traffic generation arising from other housing sites such as HSG 1. Nevertheless, as the council confirms, a Transport Appraisal would still be required as part of any new planning application lodged for the HSG 1 site. In my opinion this is not changed by the fact that a planning permission was previously granted for this site (in 1994), and it was also a proposed allocation in the adopted local plan for Rural West Edinburgh.

13. I note that site HSG 1 has been categorised as a constrained site pending completion of the Queensferry Crossing bridge development – which I understand is on schedule for completion by the end of 2016. Based on all of these considerations I have no reason to question the council's assumption that the HSG 1 site will become effective by 2024 – as

indicated in the LDP Housing Land Study (Appendix 1).

14. The 2nd Proposed Action Programme produced by the council (in May 2014 and then updated in May 2015) for the proposed local development plan – hereafter referred to as the Action Programme - under HSG 1 lists a site-specific commitment (but no date) for the Scottish Government to investigate "the opportunity to create a link road from Bo'ness Road to Society Road." In the context of significant concerns having been raised about the cumulative impacts of the amount of housing proposed in the Queensferry area, an assessment of the strategic road network's existing and projected capacity to accommodate planned growth in this area formed part of the analysis set out elsewhere in this report under Issue 11. I rely on the conclusions and recommendations set out there.

15. The impact of the proposed new sites (in table 4) is assessed through the transport appraisal which, amongst other matters, identifies the need for increasing the capacity of Dalmeny Railway Station car park and bus and rail service improvements. In addition Transport Scotland raises concern about the lack of appraisal and associated mitigation to address impacts on the Trunk Road network. To address Transport Scotland's concerns Issue 19 includes a recommended new policy requiring cumulative impact including cross boundary impacts to be assessed. This is also linked to a revised policy on developer contributions including for transport infrastructure (see Issue 21).

16. The recommendations on Issue 21 introduce area specific guidelines on the scope of the required transport mitigation. For Queensferry these "General Principles" for transport infrastructure reference assessment and mitigation in relation to:
the Queensferry and Scotstoun junctions on the A90,

- bus and rail service improvements (routes and frequency) which can be undertaken in the plan period.
- provision of additional parking facilities for cars and cycles at Dalmeny Station

17. These interventions are based on assessment through the council's transport appraisal, which does not specifically refer to the existing sites and, as explained above, HSG 2 has already progressed through the planning process. Nonetheless I consider that for HSG 1 a detailed transport assessment would still be required to support any planning application. Following on from the conclusions in Issue 19 and 11, I consider that in the context of such further assessment and the relevant policies of the plan there is nothing to suggest that an acceptable transport solution cannot be achieved or that these considerations warrant deletion of the site. Many of the sites in table 3 have progressed through the planning system. However a footnote to this table is recommended through Issue 21 to clarify that the plan's approach to infrastructure delivery is applied, as relevant, to existing as well as new sites.

Education

18. Some representations are concerned that new housing on the HSG 1 site would result in the education services in the area not being able to provide sufficient places at local and secondary schools, as these schools are perceived to be already operating at or close to capacity. The council's updated Action Programme includes a section (5a) headed Queensferry. There, under the sub-heading Education Actions for the "Queensferry Education Contribution Zone", 4 schools capacity enlargement initiatives are identified for Queensferry, with "appropriate" funding contributions being sourced from all housing developers in the area concerned and the public sector. These projects, which follow on from the council's Revised Education Appraisal dated June 2014, comprise 3 school

extensions (for Queensferry High School, St Augustine's RC High School and St Margaret's RC Primary School) as well as a new primary school at New Builyeon Road – location to be agreed. I note the council's statement that funding is also being sought for a replacement Queensferry High School on its existing site – although this is not yet a formal commitment.

19. As outlined earlier in respect of transport infrastructure, Issue 21 addresses developer contributions and also the need for clarity within the plan about the infrastructure, including in respect of schools provision, that is likely to be required within specific areas – including Queensferry - to deliver the developments proposed through the plan. Recommendations on that particular issue include the addition of General Development Principles for infrastructure delivery in each of the main areas of proposed growth. For Queensferry this includes reference to the various schools additions and extensions that may be required and the need for a cumulative approach to address delivery.

20. Based on all of these considerations I am satisfied that whilst concerns have been raised about existing and projected schools' capacities to effectively serve the HSG 1 development, the plan with proposed modification, provides a framework for education provision to be addressed. Given that new sites in Table 4 are addressed in more detail in part 1 section 5 of the plan I consider that a footnote to table 3, whilst accepting that many of these sites have progressed through the planning system, would help to clarify a consistent approach. My recommendations reflect this. Accordingly, I conclude that there is insufficient reason to delete the HSG 1 allocation on the basis of a perceived shortage of school places to meet the projected needs likely to be generated from allocation and development of this site – whilst also catering for the educational needs arising from the other residential allocations set out in the proposed plan, including HSG 2.

Greenbelt and related issues

21. As noted earlier, the HSG 1 site did not extend into the green belt as defined in the existing local plan – and it is outwith the proposed green belt area proposed in the new plan. Accordingly its continued allocation does not represent a release of a site from the green belt – which in principle would only be supported where consistent with the development plan strategy as detailed in the SESplan policy 7 and paragraph 34 of the proposed plan.

22. In the above context, whilst concerns have been raised about the loss of green belt land I find that this is not a consideration with regard to the HSG 1 site. However this does not negate the need to assess its potential landscape impact. The east edge of the proposed green belt boundary at this location is marked by the new bridge approach road immediately to the west of site HSG 1. It is an elevated, open area of ground. As such I acknowledge that any housing development here would be visible primarily from the new Queensferry Bridge approach road currently under construction, at least until the new screen planting that is being put in place matures. This new road and bridge connection will form part of a strategic corridor leading eastwards towards the city core. There is a change of slope of the fields immediately to the north of site HSG 1 and the council has not sought to include in the proposed allocation this adjoining land to the north that has more visibility from the direction of the existing and new Forth estuary crossings. I acknowledge that the HSG 1 site is also visible in local views from the existing houses on the western fringe of Queensferry.

23. I consider that the impact of allocation of the HSG 1 site on the rural setting of this

part of the city, whilst significant, must be balanced against the need to meet identified housing requirements for the plan area and set in the context of the changing character of this part of west Edinburgh, in particular with regard to Queensferry. As noted earlier, the western boundary of site HSG 1 abuts the new approach road corridor that will provide the main access to the Queensferry Bridge crossing. Those neighbouring developments are already well advanced and in my opinion they have the effect of establishing a more urban context for the site in question on this edge of the city.

24. Furthermore, I consider that the new bridge access road adjoining the HSG 1 site will form a strong new western boundary for the built–up area of Queensferry. In this context and given the fact that extensive boundary landscape treatment has already been initiated along the new road corridor, I conclude that in principle it is possible to achieve a housing development on the HSG 1 site that would integrate satisfactorily with the existing built-up area.

25. Taking all of these considerations into account I conclude that promotion of the HSG 1 site for housing development and its exclusion from the green belt – all as shown in the proposed plan - would not have an unacceptable impact on the quality, character and landscape setting of Queensferry and the city more generally. I am also of the view that the new bridge approach road along the western boundary of HSG 1 can and should form the long-term boundary for the green belt at this location such that the landscape quality, character and setting of the city can be safeguarded.

26. In terms of access to open space I see no evidence to suggest this would be significantly compromised by allocation of the HSG 1 site. Whilst this site is currently an area of open ground it does not appear to be used to a significant extent for recreation or leisure purposes by local residents or others – even though on my site visit it was being informally used by some dog walkers. Accordingly, I conclude that allocation of the HSG 1 site for housing development would not have a significant impact on access to open space.

27. Based on all the above considerations I conclude that there are no local or strategic constraints, individually or in combination, that would render the HSG 1 site inappropriate for allocation for development of approximately 150 houses in the plan period – as set out in the proposed plan.

HSG 4 West Newbridge

28. This flat, brownfield site, located close to the centre of Newbridge, was formerly occupied by industrial uses. Those activities ceased some years ago - since when the site concerned has been cleared of built structures and the focus of industrial and commercial development in the Newbridge area has shifted to sites situated to the east and south. The site in question now forms a large area of wasteland, extending to 20 hectares, which is bounded to the south by an operational rail line and to the north and west by the River Almond.

29. I note that the HSG 4 site was proposed for housing in the adopted Rural West Edinburgh Local Plan and now benefits from an outline planning permission granted in 2014. There are 2 unresolved representations regarding the council's proposed continued allocation of this site for housing in the new local development plan. Those representations raise two very specific concerns, firstly, about aircraft noise (the middle part of the site being located within the Edinburgh Airport Public Safety Zone) and, secondly, regarding the need for a flood risk assessment. I deal with each of these in turn

below.

Public Safety Zone associated with Edinburgh airport

30. The HSG 4 allocation listing in Table 3 of the proposed plan makes clear reference to the need for certain site issues and constraints, including relating to the impact of aircraft noise, to be addressed through a comprehensive master plan for the whole site and for any development here to accord with the West Edinburgh Strategic Design Framework. A section through the middle of the site is shown on the proposals map as being within the Airport Public Safety Zone where Policy Tra 11 of the new plan sets out detailed criteria against which any development proposals for sites in the public safety zones of the airport would be evaluated.

31. In this context I conclude that the above will act as safeguards to ensure that all relevant issues regarding the public safety zone and aircraft noise associated with the site's location in relation to Edinburgh airport's air traffic movements will be assessed in detail and fully dealt with, as appropriate. In summary, I conclude that the concerns raised on these matters would be satisfactorily addressed as part of the Development Management process, with direct reference to the terms of the HSG 4 allocation and policy Tra 11, prior to any proposals for the site being granted planning permission. Accordingly, I conclude that there is no need or justification to modify the plan in response to concerns about aircraft public safety zones affecting this site.

Flood protection

32. Policy Env 21 Flood Protection of the proposed plan sets out the relevant policy details related to flood risks. In paragraph 183 it states that "the purpose of this policy is to ensure development does not result in increased flood risk for the site being developed or elsewhere and notes that "identified areas of importance for flood management are identified on the Proposals Map. It is essential to maintain strict control over development in those areas. Proposals will only be favourably considered if accompanied by a flood risk assessment demonstrating how adequate compensating measures are to be carried out, both on and off the site".

33. Under the terms of policy Env 21, prior to detailed approval any proposed development at this location would be subject to the undertaking and findings of a flood risk assessment. This matter is raised specifically on this site and it may have implications for the scale and nature of the development. Consequently, I consider flood risk and the need for assessment merits specific reference in the comments in Table 3. This reflects the references as included in the development principles which are applied to new sites. My recommendation reflects this.

Overall Conclusions

34. In the above context, and given the fact that in 2014 outline planning permission was granted for housing development of this site, I would expect the air safety and related noise issues, as well as the flood risk assessment requirements, would all be addressed satisfactorily through the Development Management process prior to detailed development proposals being approved for the HSG 4 site. I would also expect any approved scheme to be implemented in accordance with an agreed master plan for its overall development. In this context I conclude that aside from adding a reference to flood risk assessment there are insufficient reasons to modify the terms of the proposed plan allocation in response to

the representations lodged.

HSG 5 Hillwood Road, Ratho Station

35. This flat site is located alongside the southern edge of the busy A8 road corridor linking Newbridge with Edinburgh city centre. Not far to the north of this main road is the western end of the main runway of Edinburgh airport. The site itself is currently open rough pasture that is partially screened from the main road by hedgerows. The site abuts existing housing immediately to the west in the vicinity of Ratho rail station.

36. The HSG 5 site was allocated for residential development in the adopted Rural West Edinburgh Local Plan and this allocation is being carried forward by the council into the proposed new plan. There are 2 unresolved representations in that regard - which raise specific concerns about aircraft noise in one case and regarding the need for a flood risk assessment in the other.

Aircraft Noise associated with Edinburgh airport

37. The allocation listed in Table 3 of the proposed plan states that any development on the HSG 5 site should accord with the West Edinburgh Strategic Design Framework. Nevertheless, unlike for site HSG 4, the comments in Table 3 for HSG 5 in the proposed plan make no reference to the proximity of Edinburgh airport or to the need for aircraft noise considerations to be taken into account by development proposals here. Whilst the council argues that potential impact of aircraft noise would need to be addressed as part of any planning application for the site, I consider that this should be made clear in Table 3 of the proposed plan - in similar terms to that stated for plan allocation HSG 4 where useful reference is made to aircraft noise constraints and the need for a master plan. I conclude that such a modification to the plan in respect of the HSG 5 allocation would also demonstrate a consistency of approach with regard to housing proposals being promoted in the new plan in the vicinity of Edinburgh airport.

Flood protection

38. Policy Env 21 Flood Protection of the proposed plan sets out the relevant policy details related to flood risks. In paragraph 183 it states that "the purpose of this policy is to ensure that development does not result in increased flood risk for the site being developed or elsewhere … and notes that "identified areas of importance for flood management are identified on the Proposals Map. It is essential to maintain strict control over development in those areas. Proposals will only be favourably considered if accompanied by a flood risk assessment demonstrating how adequate compensating measures are to be carried out, both on and off the site…"

39. Under the terms of policy Env 21 the approval of any proposed development at this location would be subject to the undertaking and findings of a flood risk assessment. This matter is raised specifically on this site and it may have implications for the scale and nature of the development. Consequently, I consider flood risk and the need for assessment merits specific reference in the comments in Table 3. This reflects the references as included in the development principles which are applied to new sites. My recommendation reflects this.

Overall Conclusions

40. The council has stated that it is minded to grant planning permission for an application (10/02737/PPP) lodged in respect of the HSG 5 site. Subject to the plan being amended to address the concerns outlined above (as set out in my recommendations below) I conclude that the aircraft noise issues as well as the flood risk assessment requirements should all be assessed in detail through the Development Management process – and addressed satisfactorily as part of any detailed development proposals being approved for the site. The implementation of any scheme approved should then be in accordance with an agreed master plan for its overall development, endorsed in writing by the planning authority.

HSG 6 South Gyle Wynd

41. The single unresolved representation with regard to this particular allocation seeks the estimated total capacity of 180 houses for this site indicated in Table 3 of the plan to be raised to 204 units. This would reflect the terms of the planning permission granted in 2014 for the site in question. Whilst the council does not dispute the factual basis of this representation, it contends that the plan should not be modified as the numbers of housing units actually completed would be monitored and reflected in the annual housing land audit. I am persuaded, however, that there is merit in the proposed plan reflecting the updated position by noting the planning permission granted and stating the capacity of the site now agreed through that planning permission - rather than relying unnecessarily on an "estimated" figure which in this particular case is more than 10% lower. I conclude that this would be consistent with the approach taken to other sites listed in Table 3 where appropriate reference is made in the comments column in cases where planning permission has been granted for a site.

HSG 7 Edinburgh Zoo (Reporter: Allison Coard)

42. This 4 hectare site is identified as a housing site for circa 80 houses. It is on the western edge of the grounds associated with Edinburgh Zoo and contains a number of associated buildings that are currently well screened within established woodland grounds. The site is carried forward from the previous local plan.

43. The site is unusual in that although allocated for housing it is retained within the green belt. It is also within a special landscape area. I consider these designations signal the particularly sensitive nature of the site in relation to its landscape setting and its role in maintaining the green wedge of land to the east of Corstorphine. From this perspective, I understand concerns that maintenance of the predominantly green wooded nature of the site is maintained so that its retention within the green belt and special landscape area remains justified. This points to a low density and high quality scheme to maintain the existing character of buildings within a woodland setting.

44. The site is detached from the established boundary of the Corstorphine Conservation Area and I note there are no current plans to review the extent of this designation. Whilst the site contributes to the setting of the urban area I do not consider its development would detract from the character and amenity of the conservation area.

45. I have considered, in light of the landscape sensitivity of the site and the need to protect the established woodland, if a lower density would be appropriate. However, circumstances have not changed since this site was considered at the last local plan inquiry and I find no reason to differ from these conclusions. The capacity is indicative and

the objective of achieving a high quality development and protection of the established landscape can be tested in the context of detailed proposals at the planning application stage, including against Policy Env 11: Special Landscape Areas and Policy Env 2 on the protection of trees. A tree survey at planning application stage should inform a careful design and layout to minimise the impact on trees which are worthy of retention.

46. I understand concerns about the restricted nature of the available access and consequent issues around noise and disturbance on Old Kirk Road and Kaimes Road. There are restricted options for access from Kaimes Road and potentially from Corstorphine Road. These options would require further detailed consideration through the planning application stage. However from the submissions and my site visit I consider there is insufficient evidence to demonstrate that there is no appropriate access solution.

47. In conclusion, I accept that a number of matters remain to be addressed at the detailed planning stage. However there is nothing sufficient to indicate at this stage that the identified constraints on access and protection of the site's sensitive landscape quality cannot be addressed even if this ultimately requires a further reduction in the assumed density of housing that can be achieved on the site. Circumstances have not changed since the current local plan in any way that would indicate that the site should not continue to be included as a housing allocation

HSG 14 Niddrie Mains

48. The two unresolved representations regarding this particular allocation each raise site-specific issues or concerns. The first relates to the terms and potential implications of a planning application lodged, along with associated amendments to the proposed Craigmillar master plan to reflect a proposed new high school on part of the HSG 14 site. The second representation is solely concerned with land ownership details relating to part of the HSG 14 site. With regard to the second representation, I find that, as a matter of principle, details of land ownership are not generally relevant to the allocation of sites in the proposed plan. Accordingly I conclude that there is no need to modify the plan to address that particular matter.

49. In response to the first of the representations, in my opinion until details of the precise location of the proposed new school in question are known, it would be premature to make any modifications to the plan. I note that the location of this school would be required to accord with the Craigmillar Urban Design Framework referred to in the comments text for HSG 14 in Table 3 of the proposed plan. Accordingly, based on all of these considerations, I conclude that there is no justification for the proposed plan to be modified in response to the representations lodged.

HSG 17 Greendykes and HSG 18 New Greendykes

50. The only unresolved representation to these two proposed allocations is concerned solely with ensuring that a flood risk assessment would be required in each case, on the basis that the sites concerned are within areas of known flood risk.

Flood Protection

51. I note that in the proposed plan policy Env 21 Flood Protection sets out the relevant policy details on these matters. Furthermore, it states in paragraph 183 of the proposed plan that "the purpose of this policy is to ensure development does not result in increased

flood risk for the site being developed or elsewhere … and notes that "identified areas of importance for flood management are identified on the Proposals Map. It is essential to maintain strict control over development in those areas. Proposals will only be favourably considered if accompanied by a flood risk assessment demonstrating how adequate compensating measures are to be carried out, both on and off the site…"

52. There is no disagreement that sites HSG 17 and HSG 18, being situated either side of a local watercourse, are identified on the Proposals Map as including "Areas of Importance for Flood Management". Under the terms of Policy Env 21 approval of any development, at either of the HSG 17 or HSG 18 locations, would therefore be subject to the undertaking and findings of a flood risk assessment. These matters are addressed by Policy Env 21 and its supporting text. This matter is raised specifically on these sites and may have implications for the scale and nature of these developments. Consequently, I consider flood risk and the need for assessment merits specific reference in the comments in Table 3. This reflects the references as included in the development principles which are applied to new sites. My recommendation reflects this.

Reporter's recommendations:

Modify the proposed plan as follows:

1. Add footnote to table 3 as recommended through Issue 21- Depending on the current planning status of the site proposals should address the required delivery of infrastructure in accordance with the relevant General Development Principles and with Policies Tra X and Del 1.

2. In the table 3 entries for HS4, 5,17 and 18 add the following to : The finalised site capacity, design and layout should be informed by an adequate flood risk assessment.

3. For site HSG 5 in the Table 3 comments column entry for HSG 5, replace the last sentence with the following:

Environmental concerns such as the proximity of the site to nearby sources of noise, including aircraft noise, must be addressed through a comprehensive master plan for the site and proposals should accord with the West Edinburgh Strategic Design Framework.

4. In the Table 3 entry for HSG 6, replace the estimated total capacity figure (180) with 204 units (and make any consequential changes to other tables or totals resulting from that update).

5. In the Table 3 comments column entry for HSG 6, replace the text shown with the following:

Planning permission granted for housing development on site adjacent to the Forrester's and St Augustine's High Schools.

Issue 7	**New Greenfield Housing Proposals – West Edinburgh Strategic Development Area (SDA)**	
Development plan reference:	**HSG 19 Maybury** **HSG 20 Cammo** **SCH 6 Maybury** **Part 1 Section 3 Table 4 pages 25 – 27** **Site Brief pages 52 – 53**	**Reporter:** Allison Coard

Body or person(s) submitting a representation raising the issue (including reference number):

47 individuals seeking removal of HSG 19 Maybury (see Issue 7 Appendix A)

179 individuals seeking removal of HSG 20 Cammo (see Issue 7 Appendix B)

42 individuals seeking removal of HSG 19 & 20 (see Issue 7 Appendix C)

Organisations, elected representatives and individuals other than those in Appendices A, B and C

0057 John Henderson
0090 Dawn Henderson
0156 G R Watt
0186 Ladywell Medical Centre East & West Wing
0193 A G McCulloch
0194 Corstorphine Community Council
0233 Cramond Primary Parents Council
0225 Cramond & Barnton Community Council
0309 Mr & Mrs Mackenzie
0311 Allan Sutherland
0335 David Anderson
0360 Grahame Whitehead
0364 Craigleith/Blackhall Community Council
0372 Robert Bargun
0439 Terry Heneaghan
0470 Grace Bruce
0482 Vivienne Cochrane
0489 James Robertson
0517 W & I Stewart
0595 L R Smith
0632 Fire Prevention Works
0636 Simple Property Management
0637 Gary Bennett
0641 Cammo Residents Association
0651 M Allen
0703 Peter Laidlaw
0752 Taylor Wimpey
0749 Cramond and Harthill Estate
0825 Network Rail
0931 KL Dickson
0986 Jo Drew
1031 Alex Tait
1177 Justin Kennedy
1329 Sandy Allison
1351 Friends of Cammo
1497 David Porteous
1501 British Airways PLC
1789 Corstorphine Old Parish Church
1955 Royal High School Parent Council
1986 East Craigs Wider Action Group
2002 Douglas Smith
2007 Ian G Stott
2008 Patricia J Stott
2115 Lynne Young
2126 Cockburn Association
2130 Colin Kerr MSP
2138 Colin Stewart
2174 Stuart Young
2210 Patrick Mitchell
2324 Fairmilehead Community Council
2402 West Craigs Ltd
2514 Bernard Mathews
2645 Christopher Vettriano
2699 Scottish Environment Protection Agency

Provision of the development plan to which the issue relates:	These provisions of the Plan deal with the proposals for new housing allocations (HSG 19 Maybury and HSG 20 Cammo) and school proposal SCH 6 Maybury in West Edinburgh.

Planning authority's summary of the representation(s):

CONTEXT

The Main Issues Report consulted on the housing site options in West Edinburgh, see question two, page 13:

- HSG 19 Maybury was consulted on as one of the preferred options;
- HSG 20 Cammo was presented as a reasonable alternative.

Both sites were included in the First Proposed Plan and received representations both objecting to their inclusion and supporting their inclusion as housing proposals. These representations were considered, however no significant changes were made to these housing proposals and they are included in the Second Proposed Plan.

Representations seeking removal of HSG 19 Maybury

Seek removal of HSG 19 on the grounds of one or more of the reasons listed below:

- **Site selection** – Representations object on the grounds of loss of green belt and green field land, loss of agricultural land, landscape setting, use of brownfield sites first and principle of sustainable development.
- **Transport infrastructure** - concerns regarding traffic congestion and impact on Maybury Road and at Barnton and Maybury Junctions, rat-running on surrounding roads, impact on road safety, emergency services and the requirement for a comprehensive traffic assessment to look at the cumulative effect. Traffic signalled junctions along Maybury Road will exacerbate congestion.
- **Impact on School infrastructure** - including school capacity, proposed boundary changes, and that high schools proposed to undergo expansion are already at maximum capacity. There is no guarantee that developer contributions will be available by the time of the occupancy of individual developments. The proposed primary school is over a mile from the Cammo site. There will be no direct bus link and parents are unlikely to walk or cycle.
- **Impact on community facilities** including healthcare facilities, as well as churches, community halls and nurseries. The nearest shopping facilities are at Whitehouse Road.
- **Impact on Biodiversity and wildlife** – including the impact on the 4 species of birds as identified on Page 11 of the Habitat Appraisal.
- **Impact on drainage and flood risk** – specifically that flood risk has not been adequately assessed.
- **Impact on Air Quality and Pollution**, specifically at Barnton and Maybury Junctions.

(2130 Colin Keir MSP and 47 individuals listed in Issue 7 - Appendix A)

Representations opposed to HSG 19 Maybury in current form and seeking its removal and/or change

- Raises concerns regarding site's location in relation to Braehead Quarry. **(0090 Dawn Henderson)**
- Objects to proposal, however if it remains requests that the housing numbers at Maybury are reduced because of traffic impact. **(2115 Lynne Young, 2174 Stuart Young)**
- Objects to the current proposal on the grounds of traffic congestion and believes

proposed traffic measures are inadequate. **(2514 Bernard Mathews)**

- Objects to the proposal however if it remains requests specific design requirements including height restrictions along the ridge and tree barrier. **(0193 A G McCulloch)**
- Objects to proposal, however if it remains requests a reduction in the allocation size of HSG19 Maybury based on landscape capacity. Development should be removed from the visible higher ground along the northern and eastern parts of the site and West Craigs farm. **(2126 Cockburn Association)**
- Objects to proposal, however if it remains the proposed tree and grassland belt is insufficient to provide a strong green belt buffer. The woodland corridor along Maybury Road would help to reduce the visual impact. The height constraint zone being extended would allow for a more extensive section of skyline to be seen. The proposed school location is distant from the Cammo site and would not encourage walking/cycling. **(0225 Cramond & Barnton Community Council)**
- Objects to proposal, however if it remains suggests 30 metre wide green network to encourage walking and cycling and create habitats whilst providing a greenbelt boundary. Suggests restricting access and an alternate route for air freight traffic in order to reduce pollution and congestion around Maybury junction. States that height restrictions will reduce impact on views from Maybury and Cammo and no building should be higher than the existing properties. Concerned that frequencies emitted from radio mast will have an effect on people's health. **(0309 Mr & Mrs Mackenzie)**
- Objects to proposal, however if it remains major works are needed at the Maybury and Craigs Road junctions before development goes ahead. Suggests turning Lennie Cottages into a cul-de-sac and having a junction further east off Turnhouse Road. **(0057 John Henderson)**
- Objects to proposal, however if it remains states that Edinburgh Airport Cargo is the main user of Turnhouse Road, an expanding business and the proposals do not adequately plan for this. **(0335 David Anderson)**
- Objects to the current proposal on the grounds of congestion. Concerned over the safety of children, lack of schools, medical facilities and cafes and youth centres for the youth. If proposal remains suggests an additional entrance to HSG 19 Maybury, to the west of Gogar Roundabout. **(1177 Justin Kennedy)**
- Objects on the grounds of traffic infrastructure and congestion. If proposal remains suggests increasing links across the railway line. Concerned over safety of school children and time lag between development taking place and school expansions happening. **(2210 Patrick Mitchell)**
- Welcome the Maybury & Cammo site brief in general terms and development principles approach to this comprehensive development. Does not consider a masterplan or phasing restriction appropriate for this site as it will delay development, viability and deliverability. Suggests amendments to Maybury and Cammo Site brief deleting a number of development principles. Objects to the allocation of 1700-2000 units on HSG 19 Maybury. Housing number figures should be 1500. Considers the site suitable for low density housing at 24.16 units per hectare. Land likely to be built out over a 6-7.5 year programme. **(2402 West Craigs Ltd)**

<u>Supports allocation of HSG 19</u>

- Supports proposals for housing due to public transport links. **(1789 Corstorphine Old Parish Church)**

- Supports the allocation of HSG 19 Maybury in relation to the Strategic Development Plan strategic growth requirements, the use of a site brief and development principles, delivery of a phased approach with the rest of the Maybury site and industrial allocation, provision of a green network, in particular the link from Cammo to Gogar including pedestrian bridge to Gogar Interchange, acknowledges height sensitivity, notes the Action Programme requirements and accepts requirement to contribute commensurate with scale and impact. There are no constraints to delivery or effectiveness of the site. **(0752 Taylor Wimpey)**

Representations seeking removal of HSG 20 Cammo

Seek removal of HSG 20 on the grounds of one or more of the reasons listed below:

- **Site selection** – Representations object on the grounds of loss of green belt and green field land, loss of agricultural land, landscape setting, use of brownfield sites first and principle of sustainable development.
- **Transport infrastructure** - concerns regarding traffic congestion and impact on Maybury Road and at Barnton and Maybury Junctions, rat-running on surrounding roads, impact on road safety, emergency services and the requirement for a comprehensive traffic assessment to look at the cumulative effect. Traffic signalled junctions along Maybury Road will exacerbate congestion.
- **Impact on School infrastructure** - including school capacity, proposed boundary changes, and that high schools proposed to undergo expansion are already at maximum capacity. There is no guarantee that developer contributions will be available by the time of the occupancy of individual developments. The proposed primary school is over a mile from the Cammo site. There will be no direct bus link and parents are unlikely to walk or cycle.
- **Impact on community facilities** including healthcare facilities, as well as churches, community halls and nurseries. The nearest shopping facilities are at Whitehouse Road.
- **Impact on Biodiversity and wildlife –** including the impact on the 4 species of birds as identified on page 11 of the Habitat Appraisal.
- **Impact on drainage and flood risk – specifically** that flood risk has not been adequately assessed.
- **Impact on Air Quality and Pollution**, specifically at Barnton and Maybury Junctions.

(0641 Cammo Residents Association 0233; Cramond Primary Parents Council; 0632 Fire Prevention Works; 0636 Simple Property Management; 2130 Colin Keir MSP; and 179 individuals listed in Issue 7 - Appendix B)

Representations opposed to HSG 20 Cammo in current form and seeking its removal and/or change

- Objects to proposal, however if it remains requests reduction in the scale of housing on the grounds of traffic congestion **(0372 Robert Bargun)**; traffic congestion and impact on schools **(0986 Jo Drew)**; reduce number of houses **(0439 Terry Heneagha; 1351 Friends of Cammo)**; reduce density of housing, change traffic management proposals and guarantee community facilities. **(1497 David Porteous))**
- Objects to the proposal and supports development on alternative sites: East of Milburn Tower site **(0225 Cramond & Barnton Community Council, 0517 W & I**

Stewart; 0651 M Allen, 1351 Friends of Cammo, 2008 Patricia J Stott); Borders Railway line **(1177 Justin Kennedy)**; the waterfront **(1497 David Porteous)**; MOD site at Craigiehall **(2002 Douglas Smith; 2138 Colin Stewart; 2210 Patrick Mitchell)** Edinburgh Park **(0637 Gary Bennett)** browfield site to the west of Edinburgh **(2115 Lynne Young).**

- Suggests that the overall 10% generosity margin for housing supply is unnecessary and therefore HSG 20 Cammo could be removed. **(0641 Cammo Residents Association; 0360 Grahame Whitehead)**
- Remove proposal from the Plan. Otherwise seeks amendments and additions to Cammo design principles. **(0225 Cramond & Barnton Community Council)**
- Supports allocation of land, however green network connections out with control of site are unreasonable and the realignment of Bughtlin Burn is unnecessary. **(0749 Cramond and Harthill Estate)**
- Objects to proposal, however if it remains reduce the allocation size of HSG20 Cammo based on landscape capacity. A new boundary could be provided by remnant hedgerow halfway between the settlement edge to the north and Bughtlin Burn to the south. Reinforced this with woodland and a stone dyke to provide a defensible boundary. **(2126 Cockburn Association)**
- Objects on the grounds of adversely affecting views to Cammo Estate; Maybury Road providing a strong green belt boundary; impact on habitats and biodiversity; traffic volumes and rat running. Welcome green network corridors, but more should be done. If proposals were to be retained then, the field adjacent to Mauseley Hill and Cammo Water Tower should be designated open space; that it is not possible for Cammo Walk to have a safe layout for shared use and a separate footpath/cycle path is required; a green corridor from Barnton to Cammo Estate; connections from Maybury to the River Almond walkway; developer contribution for the Cammo Estate. No connections for cars from Cammo proposal to Cammo Walk, and no extension of site to the Maybury development. Priority should be given to brownfield sites. **(1351 Friends of Cammo)**
- Cammo is located on a functional flood plain, or an area of known flood risk. Ponding occurs in the north- west corner. As such part of the site may not be suitable for development. A flood risk assessment is required to assess the actual flood risk from the Bughlin Burn and tributary and any culverts into or downstream of the site. **(2699 Scottish Environment Protection Agency)**
- Cammo Road is a right of way and an important exit from Cammo for traffic going to Maybury and south. Avoids problem of exiting right from Cammo Gardens. **(0595 L R Smith)**
- Objects on the grounds of traffic congestion, pollution and loss of recreational space **(2645 Christopher Vettriano)**
- Remove proposal from the Plan. Failing that, the Hub should be relocated towards the centre of the development and finance should be established for a primary school and health centre. **(2007 Ian G Stott)**

<u>Supports Allocation of HSG 20</u>

- Supports allocation of HSG20. **(0749 Cramond and Harthill Estate)**

<u>Representations seeking removal of HSG 19 Maybury & 19 Cammo</u>

Seek removal of HSG 19 and 20 on the grounds of one or more of the reasons listed below:

- **Site selection** – Representations object on the grounds of loss of green belt and green field land, loss of agricultural land, landscape setting, use of brownfield sites first and principle of sustainable development.
- **Transport infrastructure** - concerns regarding traffic congestion and impact on Maybury Road and at Barnton and Maybury Junctions, rat-running on surrounding roads, impact on road safety, emergency services and the requirement for a comprehensive traffic assessment to look at the cumulative effect. Traffic signalled junctions along Maybury Road will exacerbate congestion.
- **Impact on School infrastructure** - including school capacity, proposed boundary changes, and that high schools proposed to undergo expansion are already at maximum capacity. There is no guarantee that developer contributions will be available by the time of the occupancy of individual developments. The proposed primary school is over a mile from the Cammo site. There will be no direct bus link and parents are unlikely to walk or cycle.
- **Impact on community facilities** including healthcare facilities, as well as churches, community halls and nurseries. The nearest shopping facilities are at Whitehouse Road.
- **Impact on Biodiversity and wildlife –** including the impact on the 4 species of birds as identified on Page 11 of the Habitat Appraisal.
- **Impact on drainage and flood risk – specifically** that flood risk has not been adequately assessed.
- **Impact on Air Quality and Pollution**, specifically at Barnton and Maybury Junctions.

(0194 Corstorphine Community Council; 1986 East Craigs Wider Action Group; 2126 Cockburn Association; and 42 Individuals listed in Issue 7 - Appendix C)

Representations opposed to HSG 19 Maybury & HSG 20 Cammo in current form and seeking its removal and/or change

- Areas for development in West Edinburgh may provide in excess of 3,800 units. Existing primary care services in the area are at or near maximum capacity. The only practical solution will be to build and grow a new practice. **(0186 Ladywell Medical Centre East & West Wing)**
- Objects on the grounds of traffic congestion, pollution, loss of greenbelt and impact on views, wildlife and the environment. **(0489 James Robertson; 0703 Peter Laidlaw)**
- Objects to the proposal and suggests Granton as an alternative site. **(0931 KL Dickson)**
- Objects to proposal, however if it remains suggests importance of protecting species such as badgers, bats, buzzards and skylarks. **(0309 Mr & Mrs Mackenzie)**
- Objects to proposal, however if it remains considers that further infrastructure is required at the Gogar Interchange to accommodate the new development. **(0825 Network Rail)**
- Objects to the current proposals on the grounds of traffic congestion and transport infrastructure. **(0156 GR Watt)** Proposals should account for Lennymuir and Cammo Road. **(0311 Allan Sutherland; 1031 Alex Tait; 1329 Sandy Allison)** Seeks more effective transport remedial measures **(0364 Craigleith/Blackhall Community Council)** States there is a difficulty using Maybury Junction **(0470 Grace Bruce)** Suggests additional access points to the two proposals **(0482**

Vivienne Cochrane) Improve transport infrastructure. **(0156 G R Watt)**

- Objects on the grounds that HSG 19 and 20, while not located within the Public Safety Zone they remain in close proximity to the Airport. British Airways wishes to ensure that in the allocation of any residential development sites this should be in locations least affected by Edinburgh Airport. **(1501 British Airways PLC)**

Supports allocation of HSG 19 and HSG 20

- Supports allocation of HSG 19 and 20 Maybury and Cammo. **(2324 Fairmilehead Community Council)**

Representations opposed to SCH 6 Maybury in current form and seeking its removal and/or change

- Concerned that Maybury will have no social facilities. The proposed school is an ideal opportunity to provide community uses. **(1789 Corstorphine Old Parish Church)**
- Concerned over the lack of new high school and nursery education provision in West Edinburgh. New primary school should be tied to new development in West Edinburgh. **(1955 Royal High School Parent Council)**

Modifications sought by those submitting representations:

Representations seeking removal of HSG 19 Maybury

- Remove proposals from the Plan. **(2130 Colin Kerr MSP and 47 individuals listed in Issue 7 - Appendix A)**

Representations opposed to HSG 19 Maybury in current form and seeking its removal and/or change

- Consideration should be given to site's location in relation to Braehead Quarry **(0090 Dawn Henderson)**
- Remove proposals from the Plan or significantly reduce the number of proposed houses **(2115 Lynne Young; 2174 Stuart Young)** substantially reduce the number of houses in the proposal and introduce realistic traffic management measures. Failing that, remove proposal from the Plan. **(2514 Bernard Matthews)**
- Remove proposals from the Plan or suggests that buildings along Craigs Road should be no higher than two storeys and a tree barrier should exist between these houses and Craigs Road to form a natural green belt barrier. **(0193 A G McCulloch)**
- Remove proposals from the Plan or reduce the allocation size based on landscape capacity. No development on high ground at West Craigs. **(2126 Cockburn Association)**
- Seeks amendments to the Maybury and Cammo Site brief: a) proposed woodland / belt along Craigs Road should be widened b) the woodland corridor should be extended along Maybury Road boundary, c) the height constraint zone along Craigs Road hill ridge should be extended and scale of height restrictions clarified, d) the proposed primary school should be in a more central location. **(0225 Cramond & Barnton Community Council)**
- Remove proposals from the Plan or re-route air freight traffic through the

International Business Gateway, place restrictions on access to Craigs Road, building height restrictions, maintain mature trees around West Craigs Cottage, restriction or removal of housing in the vicinity of the radio mast on Craigs Road and provide a 30 metre wide woodland/grassland habitat along the east and north-west of the site. **(0309 Mr & Mrs Mackenzie)**

- Remove proposals from the Plan, suggests turning Lennie Cottages into a cul-de-sac and having a junction further east, off Turnhouse Road. **(0057 John Henderson)**
- Remove proposals from the Plan or if proposal remains, more research into the infrastructure needs for Turnhouse Road is required. Suggests a link road from the west site of Turnhouse Road, over the railway line. **(0335 David Anderson)** To change the exit of HSG 19 Maybury to Gogar Junction. **(1177 Justin Kennedy)** Amend proposed access requirements. Suggests increasing links across the railway line. **(2210 Patrick Mitchell)**
- No masterplan to be provided. No phasing restrictions to be placed on the site. Proposed amendments to Maybury & Cammo Site Brief bullet points 1) remove reference to development not coming forward until after 2025. 2) Delete pedestrian cycle bridge. 3) alter to "new 30m wide" green corridor will be delivered but only on land owned by West Craigs Ltd. 5) delete requirement to widen Craigs Road. 8) Delete reference limiting heights along ridgeline. 9) Delete reference to community focal point. 10) Delete reference to 30m woodland along Craigs Road. 11) Delete reference to two hectare greenspace standard. 12) Is not relevant due to lack of development. Remove reference to 2800 units in West Edinburgh. Amend HSG 19 housing numbers from 1700-2000 to 'at least 1500 units for Maybury'. Delete reference in Table 4 to the Maybury & Cammo Site Brief. Remove reference to 2800 units in West Edinburgh. **(2402 West Craigs Ltd)**

<u>Representations seeking removal of HSG 20 Cammo</u>

- Remove proposal from the Plan. **(0641 Cammo Residents Association 0233; Cramond Primary Parents Council; 0632 Fire Prevention Works; 0636 Simple Property Management; 2130 Colin Kerr MSP; and 179 individuals listed in Issue 7 - Appendix B)**

<u>Representations opposed to HSG 20 Cammo in current form and seeking its removal and/or change</u>

- Reduce the scale of housing or remove from the Plan. **(0372 Robert Bargun; 0986 Jo Drew; 0439 Terry Heneaghan; 1351 Friends of Cammo)** Reduce density of housing, change traffic management proposals and guarantee community facilities. **(1497 David Porteous)**Objects to the proposal and supports development on alternative sites: East of Milburn Tower site. **(225 Cramond & Barnton Community Council, 517 W & I Stewart; 0651 M Allen; 2008 Patricia J Stott)** Borders Railway line **(1177 Justin Kennedy)**; the waterfront **(1497 David Porteous)**; MOD site at Cragie **(2002 Douglas Smith; 2138 Colin Stewart; 2210 Patrick Mitchell)** Edinburgh Park. **(0637 Gary Bennett)** browfield site to the west of Edinburgh **(2115 Lynne Young).**
- Suggests that the overall 10% generosity margin for housing supply is unnecessary and therefore HSG 20 Cammo could be removed. **(0641 Cammo Residents Association; 0360 Grahame Whitehead)**
- Remove proposal from the Plan, otherwise seeks additions to the Cammo design

principles: a) amend to 'create a predominately green, landscaped frontage, through appropriate tree planting and other landscaping. b) amend to "the layout and limitations on the height of housing, especially buildings fronting onto Maybury Road. c) Add 'this structural planting should be established in advance of any development on this site to provide a robust and defensible green belt boundary". d) Should state that "A separate pedestrian route should be provided between Cammo and Craigs Road, in the vicinity of Cammo Walk.' In addition, a shop and other community facilities, traffic signals at Cammo Gardens and Pinegrove gardens, a tree belt along the northern boundary, and developer contributions to the Cammo Estate. **(0225 Cramond & Barnton Community Council)**

- Amendments to HSG 20 Cammo development principles bullets 6) remove "realign and", 7) remove off -site links" and "and via changes to Cammo Walk to the south". Realignment of Bughlin Burn is not appropriate or necessary. **(0749 Cramond and Harthill Estate)**
- Remove from the Plan or reduce the allocation size of HSG20 based on landscape capacity. A new boundary could be provided by remnant hedgerow halfway between the settlement edge to the north and Bughtlin Burn to the south. Reinforced this with woodland and a stone dyke to provide a defensible boundary. **(2126 Cockburn Association)**
- Remove from the Plan, however if it remains the field adjacent to Mauseley Hill and Cammo Water Tower should be designated open space, developer contribution should be provided towards Cammo Estate, a separate Cammo Walk footpath/cycle path is required, a green corridor should be provided from Barnton to Cammo Estate, connections from Maybury to the River Almond walkway. No connections for cars from Cammo proposal to Cammo Walk, and no extension of site to the Maybury development. **(1351 Friends of Cammo)**
- Remove proposal from the Plan. Failing that, increase recreational green space around Cammo Tower and introduce traffic calming measures within Cammo Road and Cammo Gardens. **(2645 Christopher Vettraino)**
- Amend the development principles include reference for the requirement for a flood risk assessment to be carried out to inform the capacity, design and layout of final scheme. **(2699 Scottish Environment Protection Agency)**
- Remove proposal from the Plan, if it remains delete closure of Cammo Road. **(0595 L R Smith)**
- Remove proposal from the Plan, failing that requests changes to design principles for HSG 20. **(0651 M Allen)**
- Remove proposal from the Plan. Failing that, the Hub should be relocated towards the centre of the development and finance should be established for a primary school and health centre. **(2007 Ian G Stott)**

<u>Representations seeking removal of HSG 19 Maybury & HSG 20 Cammo</u>

- Remove proposals from the Plan. **(1986 East Craigs Wider Action Group; Corstorphine Community Council; 2126 Cockburn Association and 42 Individuals listed in Issue 7 - Appendix C)**

<u>Representations opposed to HSG 19 Maybury & HSG 20 Cammo in current form and seeking its removal and/or change</u>

- Policy Hou 10 should be more specific with regards to what will be required in terms of primary care provision. A new healthcare facility will be required to

provide effective primary care facilities to serve the proposed West Edinburgh housing allocations. **(0186 Ladywell Medical Centre East & West Wing).**

- Remove HSG 20 from the plan and modify HSG 19 to reduce the scale of housing **(0489 James Robertson)** Reduction in scale of housing to around 200 units at Cammo and 500 units at Maybury. **(0703 Peter Laidlaw)**
- Remove proposal from the Plan and suggests alternative sites such as Granton. **(0931 KL Dickson)**
- Requests a bus stop, turning facility with shelter to be provided north of the proposed Gogar interchange. **(0825 Network Rail)**
- Remove proposal from the Plan, however if it remains proposals to account for congestion at Lennymuir and Cammo Road. **(0311 Allan Sutherland; 1031 Alex Tait; 1329 Sandy Allison)** Remove proposals Maybury and Cammo (HSG 19 & 20) from the Plan. If proposals are to proceed then seeks more effective transport remedial measures. **(0364 Craigleith/Blackhall Community Council)** Improve access. **(0470 Grace Bruce)** Suggests additional access points to the two proposals. **(0482 Vivienne Cochrane)** Improve transport infrastructure. **(0156 G R Watt)**
- Remove proposals from the Plan. **(1501 British Airways PLC)**

<u>Representations opposed to SCH 6 Maybury in current form and seeking its removal and/or change</u>

- Amend text of SCH 6 to 'New Community Primary School'. **(1789 Corstorphine Old Parish Church)**
- The Plan should address high school and nursery requirements in West Edinburgh. **(1955 Royal High School Parent Council)**

Summary of responses (including reasons) by planning authority:

<u>Site Selection - HSG 19 Maybury and HSG 20 Cammo</u>

- The LDP must conform to the relevant provisions of the approved Strategic Development Plan and its Supplementary Guidance. These include a requirement for a generous allocation of housing land in the Council's area and the designation of a green belt around Edinburgh (Strategic Development Plan Policies 5, 7 and 12).

In preparing the LDP, the Council has sought to meet the overall housing land requirement in ways which prioritise use of brownfield sites in existing urban areas and which minimise the loss of land from the green belt, in accordance with Strategic Development Plan paragraphs 113 and 130. The Council's response to the representations in Issue 5 explains why it is nevertheless necessary for the Plan to make significant new releases of greenfield land from the green belt at this time, and of the scale set out in the Second Proposed Plan.

In selecting greenfield housing sites for release, the Council has sought to minimise the impact on greenbelt objectives and to secure long-term boundaries, in accordance with Strategic Development Plan Policy 12 and paragraph 130. To do so, the Council has assessed relevant greenfield land for its suitability in these terms. The site assessment process has gathered evidence on the relevant land on a systematic and consistent basis and presented its findings in a way which enables comparison and hence selection of

those sites which are most appropriate. This approach has been informed by consideration of the findings and recommendations of the Report of Inquiry for the Edinburgh City Local Plan (pages 1-21 to 1-26).

For the Plan the Council has set out the evidence of its housing site assessment in the project's Environmental Report, which also presents the statutory Strategic Environmental Assessment of the Plan. The method and criteria used in the site selection process are described in Volume 1 of the Environmental Report – Second Revision, pages 26-33. The site assessments are set out in Appendices 5-9 (Volume 2) and, for some sites, the Environmental Report Addendum. At each stage of the Plan the Environmental Report has been revised and updated as appropriate to:

- show what regard has been had to statutory representations received at the previous stage;
- respond to changes in the Strategic Development Plan context to the Local Development Plan, which have required additional housing land to be found.

The first Proposed Plan (March 2013) allocated both Maybury and Cammo because, although the Proposed Strategic Development Plan only required new land for 2,000 houses in West Edinburgh, by that time it appeared possible that the approved SDP was going to change, and that a generous supply of land, in excess of the 2,000, was appropriate.

The criteria used for the housing site assessment are set out in Tables 6 and 7 of the Environmental Report (Volume 1). They are structured using the three objectives for green belts stated in Scottish Planning Policy paragraph 49 and Strategic Development Plan Policy 12. They correspond to Strategic Development Plan policies and the content of Scottish Planning Policy as set out in Table 1, page 3 in the Environmental Report Addendum. The assessment findings set out in the appendices of the Environmental Report include the Council's overall conclusions about whether some or all of a site should be allocated in the Plan. For ease of comparison, the assessment findings are presented in matrix form in Appendix 2 Updated of the Environmental Report Addendum (an updated version of Appendix 2 of the Environmental Report – Second Revision (Volume 1)). This is intended to be a similar format to that used in the Edinburgh City Local Plan Report of Inquiry. The Plan assessment uses a 'traffic light' symbology to indicate whether a site meets a criterion (green), does not meet it (red), or partly meets it / uncertainty (amber).

For sites selected and allocated in the Plan, a separate, statutory assessment of their likely environmental effects is set out in Appendix 3 of Volume 1 of the Environmental Report. In some cases this identifies likely adverse impacts. Section 4 of the Environmental Report sets these out along with proposed mitigation.

This site selection process has resulted in the Second Proposed Plan's spatial strategy, summarised on Figure 1 of the Plan. It meets the housing land requirements in full while designating a green belt which best meets the objectives of Scottish Planning Policy and Strategic Development Plan Policy 12. The Second Proposed Plan's spatial strategy establishes and maintains strong, clear long-term boundaries to control the outward growth of the city.

The allocation of these sites HSG 19 Maybury and HSG 20 Cammo in the Plan is therefore appropriate in terms of compliance with Scottish Planning Policy and SDP Policies 1 A & B, 5, 7, 8, 9 and 12.

No modification proposed.

Representations seeking removal of HSG 19 Maybury

- **Site Selection -** See Council's response on site selection and principle of development on Page 6.
- **Transport infrastructure -** As part of the Local Development Plan process, the Council has carried out a Transport Appraisal. (Volumes 1 and 2, 2013, Addendum, 2014) This appraised the cumulative impact of the new developments proposed in the Plan, taking account of other factors. This identifies improvements to transport infrastructure to deal with the net impact of new housing proposals in West Edinburgh. These transport actions are set out in the Council's Proposed Action Programme pages 17-18, 21. For Maybury, the actions include enhancements to peak period bus capacity; junction improvements at Maybury Road, Barnton Junction and Craigs Road; improvements to walking and cycling and access to the strategic rail and tram network. The detail of these actions is being established through transport assessments required at the planning application stage. All relevant proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.
- **School infrastructure -** As part of the Plan process, the Council has prepared a Revised Education Appraisal June 2014 (corrected September 2014) which identifies the improvements to school infrastructure to deal with the net impact of new housing proposals in West Edinburgh. These Education actions are set out within the Council's Proposed Action Programme, pages 18-20. For Maybury these actions include a new Maybury Primary School (SCH 6 Maybury) and additional capacity within both the non-denominational and denominational primary and high school estate. All proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.
- **Community facilities -** The Plan in paragraph 72 acknowledges that housing proposals will have implications for the provision of primary healthcare and other community health services. Policy Hou 10 Community Facilities seeks to ensure that where practical and reasonable a range of community facilities is provided with new housing development. The Plan identifies where non-residential units should be provided in new housing sites (e.g. at Maybury) which could provide potential premises for new health practices. Paragraph 130 of the Plan states that developer contributions to measures intended to mitigate the net effects of development, other than actions identified in the Action Programme, may also be required. The Council has discussed all growth allocations with the relevant part of the NHS Lothian. This has assessed the need for new and expanded general practitioner practices to accommodate the planned housing growth set out in the Second Proposed Plan. No specific actions have been included in the Action Programme at this time, however when suitable and specific actions are identified these will be included in future iterations of the Action Programme. Where these are needed to address demand arising from new development, financial contributions towards the cost may be sought in line with relevant policies and guidance.
- **Biodiversity -** In preparing a Local Development Plan, the Council must comply with the Scottish Biodiversity Duty. This has been done by carrying out a Strategic Environmental Assessment. One of the objectives of the Strategic Environmental Assessment is to 'Protect and enhance biodiversity, flora and fauna, and habitat networks'. The Strategic Environmental Assessment's findings are available in the Environmental Report. Volume 1 page 34 sets out the method of assessment,

which uses the maps in Volume 2 (page 3). The relevant findings regarding Maybury are set out in Volume 1 page 69.The allocations do not have a significant harmful effect on biodiversity, flora or fauna.

- **Drainage and flood risk -** In preparing a Local Development Plan, the Council must consider the impact of development on flood risk. The Plan proposals have been assessed strategically for flood risk using a fluvial flood risk map showing areas at medium-to-high risk (i.e. a 1-in-200 year event) (Figure 3 of the Environmental Report Volume 1, page 21 and Volume 2 page 5) This fluvial flood risk map was updated using SEPA's new mapping published in January 2014. At Maybury, the Plan does not newly allocate any developable land in shown areas of fluvial flood risk. The issue of flood risk for all developments, not just LDP proposals is addressed through Policy Env2.
- **Air Quality and Pollution -** The Environmental Report identifies this as one of the main environmental issues currently prevalent within the Council area (Volume 1, page 40). It finds that the Plan's generally supportive development policies may lead to further negative cumulative and synergistic effects, particularly within key transport corridors. The current air quality issues are attributed mainly to traffic congestion and Air Quality Management Areas are in place with Council action plans setting out measures to help reduce vehicle emissions within these areas. The Council's Local Transport Strategy (2014-2019) identifies a range of actions and policies to reduce emissions and improve air quality standards across the city. With specific regard to new allocations in strategic development areas, the Environmental Report identifies the potential for a short-to-medium harmful impact. Mitigation measures include:
    - Locating development in accessible locations
    - A number of public transport improvements
    - Other measures identified in site briefs and development principles in the Plan.

No modifications proposed.

(2130 Colin Kerr MSP; 47 Individuals listed in Issue 7 - Appendix A);

<u>Representations opposed to HSG 19 Maybury in current form and seeking its removal and/or change</u>

- Policy RS 2 Safeguarding of Existing Waste Management Facilities states that development in the area immediately surrounding an existing or safeguarded waste management facility (as identified on the Proposals Map) will only be allowed if it is demonstrated that there will be no adverse implications for the approved waste handling operations. This will be determined at the Planning Application stage. **(0090 Dawn Henderson)**
- It is appropriate for planning authorities to identify the capacities of housing sites in their Local Development Plans. To do so, it is necessary for them to make assumptions about density. The density assumption at Maybury comes from multiplying the developable area identified on page 48 of the Environmental Report – Second Revision Volume 2 (62 hectares), by the density range on page 28 of Volume 1 (27.5 to 32.5 dwellings per hectare). This is supported by National Planning Framework 3 and Scottish Planning Policy. National Planning Framework 3 paragraph 2.20 provides support for increased densities in key locations which are well served by public transport. West Edinburgh is one such location, and the good accessibility of part of the Maybury site is one of the reasons for its allocation

in the Plan. Scottish Planning Policy in paragraphs 45 and 46 supports the use of higher densities to help achieve some of the six qualities of successful places. It should be noted that the Plan's capacity range for Maybury and for the other new housing allocations is low in the Edinburgh context. No modification proposed. **(2115 Lynne Young; 2174 Stuart Young; 2514 Bernard Matthews)**

- The requirement to provide a new wooded boundary of 30 m width along Craigs Road is set out as part of Maybury (HSG 19) Development Principles, p.52. The requirement for development to respect the ridgeline of Craigs Road and elevated slopes within the site is set out as part of HSG 19 Maybury Development Principles; p. 52 with an area subject to a height constraint is shown on the site brief on p.53. Upon submission of a site masterplan, these matters would be considered in detail through the Plan's Design and Environmental policies, in particular Des 4 – Development Design – Impact on Setting, Des 8 – Public Realm and Landscape Design and Des 9 – Urban Edge Development**.** No modification proposed. **(0193 A G McCulloch)**
- Implementation of the West Edinburgh Planning Framework in accordance with the Council's Strategic Design Framework and Landscape Framework will lead to a substantial urban expansion to the north of the A8. Development of the International Business Gateway along the A8 corridor will be integrated with the Airport and form a new settlement altering the pattern of the city and rural characteristics considered by the Edinburgh Green Belt Study in 2008. The construction of the Tram depot and Edinburgh Gateway Station will additionally change the character of land around Maybury, in addition creating a natural focus for sustainable development by improving public access to public transport. The Edinburgh Green Belt Study (2008) supports the principle of development on the south-west facing land with Lennie Hill and ridge of West Craigs providing a robust northern greenbelt boundary, where woodland could enhance landscape character. This growth would be in line with the emerging spatial pattern of the City at West Edinburgh and a new containing edge to the City would be provided by Lennie Hill. Concern with regard to the impact of development upon more elevated ground within the site will be addressed through the requirement for development to respect the ridgeline of Craigs Road and elevated slopes within the site is set out as part of HSG 19 Maybury Development Principles, p. 52 with an area subject to a height constraint is shown on the site brief on p.53. No modification proposed. **(2126 Cockburn Association)**
- The Edinburgh Design Guidance sets out spatial requirements for green networks, including urban edge treatments. These range from 30-50 in width to allow adequate space for native trees to achieve mature height and spread, provide a secure setting to multi-user paths and enable suitable integration with new development. The green belt boundary at Cammo is indicated as 40 m wide. This will allow for wetland habitat creation and improvements to the bank of the Bughtlin Burn, open grassland and a new multi-user path, alongside new woodland planting to establish a suitable boundary to the urban edge and Cammo Inventory site. A 30 m boundary is proposed at Craigs Road to form a new green belt boundary along the existing ridgeline. This will provide a wooded backdrop to new development set down from the ridge in northward views, whilst avoiding visual impacts in southward views from the Cammo Inventory Site. Woodland planting is not proposed along Maybury Road to the east, in order to allow a physical and visual relationship to be established with the existing urban area as part of a well planned extension to the city. The treatment of this boundary would be determined through planning application in accordance with Design policies. Requirement for development to respect the ridgeline of Craigs Road and elevated slopes within

the site is set out as part of HSG 19 Maybury Development Principles, page 52 with an area subject to a height constraint is shown on the site brief on page 53. Upon submission of a site masterplan, these matters would be considered in detail through Design and Environmental policies, in particular Des 4 – Development Design – Impact on Setting, Des 8 – Public Realm and Landscape Design and Des 9 – Urban Edge Development d) The location of the proposed primary school is indicative. It is adjacent to the proposed commercial / retail centre to create an community focal point in an accessible location with access to the Gogar interchange and Edinburgh Gateway Station. No modification proposed. **(0225 Cramond & Barnton Community Council)**

- Requirement for development to respect the ridgeline of Craigs Road and elevated slopes within the site is set out as part of HSG 19 Maybury Development Principles; p. 52 with an area subject to a height constraint is shown on the site brief on p.53. The radio mast on Craigs Road will be located within the 30m new woodland shown on p.53. The 30 m wide green network connection through the site is a requirement of the HSG 19 Maybury Development Principles, p.52 and is shown on the Site Brief on p.53. There is no requirement for a 30m woodland boundary to Maybury Road. The treatment of this boundary would be determined through planning application in accordance with Design policies. No modification proposed. **(0309 Mr & Mrs Mackenzie 1)**
- The detail of the road layout for Maybury, including design of Lennie Cottages and Turnhouse Road will be discussed with the applicant at the masterplanning and detailed planning application stage. No modification proposed. **(0057 John Henderson)**
- The Transport Appraisal (Volumes 1 and 2, 2013, Addendum, 2014) sets out the trips that each new housing development will generate, and identifies what key routes they will be distributed onto. It also makes assumptions for 'committed development' (taken from 2011 housing audit), and background traffic growth assumptions. It is up to the developer when carrying out a Transport Assessment for a planning application to prepare detailed transport modelling, which will include the cumulative traffic movements including those associated with air freight. No modification proposed. **(0335 David Anderson; 0309 Mr & Mrs Mackenzie 2)**
- The requirement to upgrade the Gogar roundabout (to gain extra circulation lanes) and a new road bridge over the railway line would make this unreasonable for a developer to provide and therefore would preclude this as an option. No modification proposed. **(0335 David Anderson; 1177 Justin Kennedy; 2210 Patrick Mitchell)**
- The Development Principles for HSG 19 Maybury set out the broad site specific objectives for proposed allocations, any alteration to these should be justified through submission of a comprehensive masterplan at the planning application stage and through development of detailed design solutions. Phasing is required to start from the east to ensure integration with the urban area and adjoining sites. The proposed pedestrian cycle crossing across the rail line is to ensure high as possible public mode share (direct access to tram/rail) at Edinburgh Gateway Station and tram interchange. A green network link is required between the pedestrian cycle bridge crossing to the Edinburgh-Fife railway line at Gogar and Craigs Road to the north of the proposed allocation; this is set out as part of the wider spatial strategy for West Edinburgh SDA. The widening of Craigs Road is required to accommodate increase in traffic from HSG 19 Maybury. The community focal point will provide local services in an accessible location close to the new pedestrian/cycle bridge. This includes a new primary school, civic space

and units suitable for local shopping and healthcare facilities. The Environmental Report – Second Revision, considered the impact of development upon the West Craigs ridge under the assessment area 'East of Turnhouse Road', pp 45-47. It considered the site's upper ridgeline to be unsuitable for development. The additional height of development would be conspicuous in views from Maybury Road, views towards Corstorphine Hill from the International Business Gateway and in southward views towards the Pentland Hills from the Cammo Inventory site. The Maybury Site will be deficient in terms of the Large Greenspace Standard set out on page 15 of the Council's Open Space Strategy (2010). There is also an existing deficiency in terms of meeting this standard to the east of Maybury Road, as shown on page 22 of the Council's Open Space Strategy (2010 Due to the scale of the site, two large public parks will be required to meet this standard at Maybury. In terms of density, it is appropriate for planning authorities to identify the capacities of housing sites in their Local Development Plans. To do so, it is necessary for them to make assumptions about density. The density assumption at Maybury comes from multiplying the developable area identified on page 48 of the Environmental Report – Second Revision Volume 2 (62 hectares), by the density range on page 28 of Volume 1 (27.5 to 32.5 dwellings per hectare). This is supported by National Planning Framework 3 and Scottish Planning Policy. National Planning Framework 3 paragraph 2.20 provides support for increased densities in key locations which are well served by public transport. West Edinburgh is one such location, and the good accessibility of part of the Maybury site is one of the reasons for its allocation in the Plan. Scottish Planning Policy in paragraphs 45 and 46 supports the use of higher densities to help achieve some of the six qualities of successful places. No modification proposed. **(2402 West Craigs Ltd)**

Update from Capital Coalition Motion 14 May 2015:

Subject to the following points regarding the outcome of an appeal at Cammo, the Council sees merit in the representations seeking a reduction in the capacity of proposals HSG 19 Maybury and (in Issue 11) HSG 32 Builyeon Road and HSG 33 South Scotstoun. The Council notes that these sites currently have a total capacity of 3130 units and that a proportionate reduction in their housing capacity resulting in fewer units could be accounted for by the remaining capacity provided by the allocation of East of Millburn Tower (see Issue 14).

Appeal PPA-230-2134 relates to the site of HSG 20 Cammo. It was pending decision as of 28 May 2015. If, before the conclusion of this LDP examination, the Cammo appeal is allowed and planning permission granted, the Council directs attention to the representations raised in relation to HSG 19 Maybury and states that they are of particular merit.

If the Cammo appeal is dismissed and permission refused, the Council states that it sees merit in the representations which object to HSG 20 Cammo, and that the reduction in numbers could be accounted for by the remaining capacity provided by the allocation of East of Millburn Tower (see Issue 14). The Council notes that the removal of sites HSG 31 Curriemuirend, HSG 36 Curriehill Road and HSG 37 Newmills Road could also be accommodated within that capacity, but that there would thus be reduced scope to accommodate a reduction in the sites HSG 19 Maybury, HSG 32 Builyeon Road and HSG 33 South Scotstoun. Should this scenario arise, the Council directs attention to the representations raised in relation to HSG 32 Builyeon Road and HSG 33 South Scotstoun, and states that they are of particular merit.

Representations seeking removal of HSG 20 Cammo

- **Site Selection -** See Council's response on site selection and principle of development on Page 7.
- **Transport infrastructure -** As part of the Local Development Plan process, the Council has carried out a Transport Appraisal. (Volumes 1 and 2, 2013, Addendum, 2014) This appraised the cumulative impact of the new developments proposed in the Plan, taking account of other factors. This identifies improvements to transport infrastructure to deal with the net impact of new housing proposals in West Edinburgh. These transport actions are set out in the Council's Proposed Action Programme page 17-18, 22. For Cammo, the actions include enhancements to peak period bus capacity; junction improvements at Maybury Road, Barnton Junction and Craigs Road; improvements to walking and cycling and access to the strategic rail and tram network via Cammo Walk. The detail of these actions is being established through transport assessments required at the planning application stage. All relevant proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.
- **School infrastructure -** As part of the Plan process, the Council has prepared a Revised Education Appraisal, June 2014 (corrected September 2014) which identifies the improvements to school infrastructure to deal with the net impact of new housing proposals in West Edinburgh. These Education actions are set out within the Council's Proposed Action Programme, pages 18-20. For Cammo these actions include a new Maybury Primary School (SCH 6 Maybury) located within HSG 19 Maybury and additional capacity within both the non-denominational and denominational primary and high school estate. All proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.
- **Community facilities -** The Plan in paragraph 72 acknowledges that housing proposals will have implications for the provision of primary healthcare and other community health services. Policy Hou 10 Community Facilities seeks to ensure that where practical and reasonable a range of community facilities is provided with new housing development. The Plan identifies where non-residential units should be provided in new housing sites (e.g. at Maybury) which could provide potential premises for new health practices. Paragraph 130 of the Plan states that developer contributions to measures intended to mitigate the net effects of development, other than actions identified in the Action Programme, may also be required. The Council has discussed all growth allocations with the relevant part of NHS Lothian. This has assessed the need for new and expanded general practitioner practices to accommodate the planned housing growth set out in the Second Proposed Plan. No specific actions have been included in the Action Programme at this time, however when suitable and specific actions are identified these will be included in future iterations of the Action Programme. Where these are needed to address demand arising from new development, financial contributions towards the cost may be sought in line with relevant policies and guidance.
- **Biodiversity -** In preparing a Local Development Plan, the Council must comply with the Scottish Biodiversity Duty. This has been done by carrying out a Strategic Environmental Assessment. One of the objectives of the Strategic Environmental Assessment is to 'Protect and enhance biodiversity, flora and fauna, and habitat networks'. The Strategic Environmental Assessment's findings are available in the Environmental Report. Volume 1 page 34 sets out the method of assessment,

which uses the maps in Volume 2 (page 3). The relevant findings regarding Cammo are set out in Volume 1 page 70.The allocations do not have a significant harmful effect on biodiversity, flora or fauna.

- **Drainage and flood risk** - In preparing a Local Development Plan, the Council must consider the impact of development on flood risk. The new Local Development Plan proposals have been assessed strategically for flood risk using a fluvial flood risk map showing areas at medium-to-high risk (i.e. a 1-in-200 year event) (Figure 3 of the Environmental Report Volume 1, page 21 and Volume 2 page 5) This fluvial flood risk map was updated using Scottish Environmental Protection Agency's new mapping published in January 2014. Cammo (HSG 20) Site Development Principle 'improve the quality of the water environment through works to re-align and improve the bank side treatment of the Bughltin Burn' is requested to address the advice of Scottish Environmental Protection Agency as a Strategic Environmental Assessment Consultation Authority at the Main Issues Report stage, in line with the objectives of the European Water Framework Directive. This reflects the artificially channelled condition of the burn in this location and the poor ecological status of the River Almond, to which it forms a tributary. This could potentially give rise to beneficial effects on the Water Environment. Refer to the Plan Revised Environmental Report March 2013 Vol 1, p.9. Appropriate licensing of such works would be required. The issue of flood risk for all developments, not just the Plan proposals is addressed through policy Env2.
- **Air Quality and Pollution -** The Environmental Report identifies this as one of the main environmental issues currently prevalent within the Council area (Volume 1, page 40). It finds that the Plan's generally supportive development policies may lead to further negative cumulative and synergistic effects, particularly within key transport corridors. The current air quality issues are attributed mainly to traffic congestion and Air Quality Management Areas are in place with Council action plans setting out measures to help reduce vehicle emissions within these areas. The Council's Local Transport Strategy (2014-2019) identifies a range of actions and policies to reduce emissions and improve air quality standards across the city. With specific regard to new allocations in strategic development areas, the Environmental Report identifies the potential for a short-to-medium harmful impact. Mitigation measures include:
    - Locating development in accessible locations
    - A number of public transport improvements
    - Other measures identified in site briefs and development principles in the Plan.

  No modification proposed.

  <u>Update from Capital Coalition Motion 14 May 2015:</u>

  Appeal PPA-230-2134 relates to the site of HSG 20 Cammo. It was pending decision as of 28 May 2015. If, before the conclusion of this LDP examination, the Cammo appeal is allowed and planning permission granted, the Council directs attention to the representations raised in relation to HSG 19 Maybury and states that they are of particular merit.
  If the Cammo appeal is dismissed and permission refused, the Council states that it sees merit in the representations which object to HSG 20 Cammo, and that the reduction in numbers could be accounted for by the remaining capacity provided by the allocation of East of Millburn Tower (see Issue 14). The Council notes that the removal of sites HSG 31 Curriemuirend, HSG 36 Curriehill Road and HSG 37 Newmills Road could also be accommodated within that capacity, but that there

would thus be reduced scope to accommodate a reduction in the sites HSG 19 Maybury, HSG 32 Builyeon Road and HSG 33 South Scotstoun. Should this scenario arise, the Council directs attention to the representations raised in relation to HSG 32 Builyeon Road and HSG 33 South Scotstoun, and states that they are of particular merit.

(0641 Cammo Residents Association 0233; Cramond Primary Parents Council; 0632 Fire Prevention Works; 0636 Simple Property Management; 2130 Colin Kerr MSP; 180 Individuals listed in Issue 7 - Appendix B)

Representations opposed to HSG 20 Cammo in current form and seeking its removal and/or change

- It is appropriate for planning authorities to identify the capacities of housing sites in their Local Development Plans. To do so, it is necessary for them to make assumptions about density. The density assumption at Maybury comes from multiplying the developable area identified on page 48 of the Environmental Report – Second Revision Volume 2 (20 hectares), by the density range on page 28 of Vol 1 (27.5 to 32.5 dwellings per hectare). This is supported by National Planning Framework 3 and Scottish Planning Policy. National Planning Framework 3 paragraph 2.20 provides support for increased densities in key locations which are well served by public transport. West Edinburgh is one such location, and the good accessibility of the Cammo site is one of the reasons for its allocation in the Plan. Scottish Planning Policy in paragraphs 45 and 46 supports the use of higher densities to help achieve some of the six qualities of successful places. It should be noted that Plan capacity range for Cammo and for the other new housing allocations is low in the Edinburgh context. No modification proposed. **(0372 Robert Bargun, 0439 Terry Heneaghan, 0986 Jo Drew, 1351 Friends of Cammo; 1497 David Porteous, 2115 Lynne Young)**
- Some representations have identified other sites as an alternative to HSG20. Other sites have been identified in the Second Proposed Plan as explained in the Revised Environmental Report June 2014. However because of the increased housing requirement for Edinburgh, these are in addition to HSG20, not alternatives. This includes the waterfront **(1497 David Porteous)** and Edinburgh Park **(0637 Gary Bennett).** Other suggested sites within Edinburgh are not considered appropriate for the reasons set out in the Revised Environmental Report June 2014. This includes East of Milburn Tower site **(225 Cramond & Barnton Community Council; 0517 W & I Stewart; 2008 Patricia J Stott; 0651 M Allen)** Borders Railway line **(1177 Justin Kennedy)** and the MOD site at Craigiehall **(2002 Douglas Smith; 2138 Colin Stewart; 2210 Patrick Mitchell).** No modification proposed.
- Scottish Planning Policy, paragraph 116, requires that housing supply targets should be increased by a margin of 10-20% to establish the housing land requirement, in order to ensure that a generous supply of land for housing is provided. The exact extent of the margin will depend on local circumstances. SDP Supplementary Guidance on Housing Land November 2014, Table 3.1 sets for Edinburgh a housing land requirement for 2009-2024 of 29,510 units. Scottish Planning Policy Diagram 1 does not require LDPs to add on a generosity margin to housing land requirements. Nonetheless, a 10% generosity factor has been added to the Edinburgh requirement for the period 2009-2024 of 29,510 to set an overall LDP housing land supply target of 32,460. This adds 2,950 homes to the figure in the SDP Supplementary Guidance, with further generosity provided through the

use of capacity ranges for site allocations and in a significant margin of error for the windfall assumption. 10% is considered to provide a generous supply and it is not proposed that this should be increased. Setting a larger margin would not take account of the fact that the SDP requires the LDP to maintain a green belt (Policy 12) and minimise loss of land from the green belt (Strategic Development Plan, paragraph 130). No modifications proposed. **(0641 Cammo Residents Association; 0360 Grahame Whitehead)**

- Bullet point (a) refers to principles reflecting Scottish Government policy set out in Designing Streets. The Council considers that a new street frontage would assist in meeting these policy objectives, given the busy nature of this road, alongside new pedestrian crossing points and a reduced speed limit. An allowance for suitable landscape treatment along this boundary has been made in the indicative area for new housing set out in Revised Environmental Report June 2014 - Volume 2, p. 48. (b) The implications of layout and building heights upon the retention of views through the site would be assessed against the site brief as part of any planning application. In particular Policy Des 3 – Development Design – Incorporating and Enhancing Existing and Potential Features and Des 4 Development Design – Impact on Setting. (C) Landscape works in advance of development cannot be required through Planning Conditions, which meet the established tests set out in Circular 4/1998. Advance planting would also practically conflict with the requirement for improvements to the Bughtlin Burn. However, the implementation of the new green belt boundary would be an important consideration in the determination of any application for this site, which should be controlled in relation to the phasing, completion and occupation of residential units. The Plan and Action Programme identify a requirement for a new pedestrian route 'Cammo Walk' to be provided by the developments at Maybury and Cammo. Further work is currently being undertaken in relation to the design of this link. Housing proposals do not preclude the inclusion of non-residential units provided that they meet design policies and do not have an unacceptable impact on the nearby established Local Centre at Davidson Mains. Traffic signals at Cammo Gardens and Pinegrove Gardens are not required as part of the development. There is no justification to require developer contributions for improvements to Cammo Estate. No modification proposed. **(0651 M Allen; 0225 Cramond & Barnton Community Council)**
- Green network connections and off site path links on land outwith the developer's control will be implemented as set out in the Action Programme and form part of the wider spatial strategy set out in the Second Proposed Plan. Cammo (HSG 20) Site Development Principle 'improve the quality of the water environment through works to re-align and improve the bank side treatment of the Bughltin Burn' is requested to address the advice of Scottish Environment Protection Agency as a Strategic Environmental Assessment Consultation Authority at the Main Issue Report stage, in line with the objectives of the European Water Framework Directive. This reflects the artificially channelled condition of the burn in this location and the poor ecological status of the River Almond, to which it forms a tributary. This could potentially give rise to beneficial effects on the Water Environment. Refer to the Plan Revised Environmental Report March 2013 Vol 1, p.9. Appropriate licensing of such works would be required. No modification proposed. **(0749 Cramond and Harthill Estate)**
- The remnant hedgerow referred to by the representation provides very limited physical and visual differentiation between the arable land to its north and south. The Council considers the Bughtlin Burn forms a stronger visual feature and physical barrier to development, subject to existing field boundary trees being

supplemented with new woodland to provide a new green network link between Bughtlin and Cammo and long-term green belt boundary to Cammo and Lennie Hill. The alternative site boundary proposed in the representation would still impact upon local views to the historic environment, which would be seen in the context of new development, particularly given the limited enclosure provided by the remnant hedgerow. Development in this location would fully enclose the northern section of the A902, from which open views to features of the Inventory Site are experienced, as described in the Inventory of Gardens and Designed Landscapes in Scotland. The Council has made provision for views to these features to be retained through the site by means of street and open space design. Up to 5 ha land has been allowed for to provide views across the site and provide a landscape treatment to Maybury Road. Refer to indicative area for new housing set out in Revised Environmental Report June 2014 - Volume 2, p. 48. During the Plan process Historic Scotland requested a planted buffer along the eastern edge of the Cammo Inventory Site and additionally in consideration of planning application 14/01776/PPP in their letter of 9 June 2014, Historic Scotland stated 'the important view into the designed landscape from Maybury Road will be protected by the creation of a number of linear parks within the development site. No modification proposed. **(2126 Cockburn Association)**

- Open Space provision will be addressed at the masterplan stage taking account of policy Hou3. There is currently no deficiency in terms of the Council's Large Greenspace Standard as set out in the Open Space Strategy. The existing Cammo Estate Park is approx 38 ha, exceeding the minimum 2 ha requirement and meets the Council's greenspace quality standards. The features remain within agricultural land subject to green belt designation. Access may be taken in accordance with the Scottish Outdoor Access Code. There is no justification to require developer contributions for improvements to Cammo Estate. No modification proposed. **(1351 Friends of Cammo**; **2645 Christopher Vettraino)**
- The issue of flood risk for all developments, not just LDP proposals is addressed through policy Env2. No modification proposed. **(2699 Scottish Environment Protection Agency)**
- The Plan and Action Programme identify a requirement for a new pedestrian route 'Cammo Walk'. The detail of these actions is being established through transport assessments required at the planning application stage. All relevant proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.
- No modification proposed. **(0595 L R Smith)**
- Housing proposals do not preclude the inclusion of non-residential units provided that they meet design policies and do not have an unacceptable impact on the nearby established Local Centre at Davidson Mains. All relevant proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance. No modification proposed. **(2007 Ian G Stott)**

<u>Representations seeking removal of HSG 19 and HSG 20</u>

- The Council's response and reasoning regarding issues relating to transport infrastructure, school infrastructure, community facilities and air quality and pollution is set out for each site individually above. No modification proposed.

No modification proposed.

(1986 East Craigs Wider Action Group; 0194 Corstorphine Community Council; 2126 Cockburn Association; and 41 Individuals listed in Issue 7 - Appendix C)

Representations opposed to HSG 19 & HSG 20 in current form and seeking removal and/or change

- Paragraph 72 of the Plan acknowledges that housing proposals will have implications for the provision of primary care and other community health services. Policy Hou 10 states that planning permission will only be granted where there are associated proposals to provide any necessary health and other community facilities. Growth allocations set out in the Plan have been discussed with NHS Lothian. No specific actions have been identified for inclusion in the Action Programme at this time. Should specific actions be identified these will be detailed in future iterations of the Action Programme. No modification proposed. **(0186 Ladywell Medical Centre East & West Wing).**
- It is appropriate for planning authorities to identify the capacities of housing sites in their Local Development Plans. To do so, it is necessary for them to make assumptions about density. The density assumptions at Maybury and Cammo come from multiplying the developable area identified on page 48 of the Environmental Report – Second Revision Volume 2 (20 hectares), by the density range on page 28 of Volume 1 (27.5 to 32.5 dwellings per hectare). This is supported by National Planning Framework 3 and Scottish Planning Policy. National Planning Framework 3 paragraph 2.20 provides support for increased densities in key locations which are well served by public transport. West Edinburgh is one such location, and the good accessibility of part of the Maybury site is one of the reasons for its allocation in the Plan. Scottish Planning Policy in paragraphs 45 and 46 supports the use of higher densities to help achieve some of the six qualities of successful places. It should be noted that capacity range for Cammo and for the other new housing allocations is low in the Edinburgh context. No modification proposed. **(0489 James Robertson; 0703 Peter Laidlaw)**
- Representations have identified other sites as an alternative to HSG20. Other sites have been identified in the Second Proposed Plan as explained in the Revised Environmental Report, June 2014. However because of the increased housing requirement for Edinburgh, these are in addition to HSG20, not alternatives. This includes Granton. No modification proposed. **(0931 KL Dickson)**
- Requirement for development to respect the ridgeline of Craigs Road and elevated slopes within the site is set out as part of Maybury (HSG 19) Development Principles; p. 52 with an area subject to a height constraint is shown on the site brief on p.53. Upon submission of a site masterplan, these matters would be considered in detail through Design and Environmental policies, in particular Des 4 – Development Design – Impact on Setting, Des 8 – Public Realm and Landscape Design and Des 9 –Urban Edge Development. Site specific protection of trees would be considered against Policy Env 12 Trees. No modification proposed. **(0309 Mackenzie)**
- Transport infrastructure requirements in relation to the sites in West Edinburgh have been assessed by the accompanying Transport Appraisal (Volumes 1 and 2, 2013, Addendum, 2014) and a range of transport actions addressing a number of modes identified in the Action Programme. Additional potential requirements such as bus stops, turning facilities with shelter at the Gogar interchange will be discussed with the developer at masterplan and planning application stage. If these are considered to be appropriate the Action Programme will be updated. No modification proposed. **(0825 Network Rail)**

- The Transport Appraisal (Volumes 1 and 2, 2013, Addendum, 2014) sets out the trips that each new housing development will generate, and identifies what key routes they will be distributed onto. It also makes assumptions for 'committed development' (taken from the 2011 Housing Land Audit), and background traffic growth assumptions. It is up to the developer when carrying out a Transport Appraisal for a planning application to prepare detailed transport modelling, which will include the cumulative traffic movements including those associated with Lennymuir and Cammo Road. No modification proposed. **(0311 Allan Sutherland; 1031 Alex Tait; 1329 Sandy Allison)**
- Neither the Transport Appraisal (Volumes 1 and 2, 2013, Addendum, 2014), or the Action Programme nor the Plan specify the junction solution for Maybury Junction. The Council is considering options for the design and delivery of this improvement scheme. **(0470 Grace Bruce)** Access to the new Gogar Railway Station; the access road to the International Business Gateway; the requirement to upgrade the Gogar roundabout (to gain extra circulation lanes and a new road bridge over the railway line would make this unreasonable for a developer to provide **(0482 Vivienne Cochrane)** Transport infrastructure requirements in relation to the sites in West Edinburgh has been assessed by the Transport Appraisal (Volumes 1 and 2, 2013, Addendum, 2014) and a range of transport actions addressing a number of modes identified in the Action Programme including proposals to upgrade Barnton, Craigs Road and Maybury junctions (T17, T18 and T19) No modification proposed. **(0364 Craigleith/Blackhall Community Council; 0156 G R Watt)**
- Potential impact of aircraft noise will be required to be addressed as part of a comprehensive masterplan and planning applications for both the Maybury and Cammo sites. No modification proposed. **(1501 British Airways PLC)**

Representations opposed to SCH 6 Maybury in current form and seeking its removal and/or change

- All primary schools and secondary schools (whether they are officially Community High Schools or not) will have ad hoc community use hall bookings etc outside of schools hours but only those categorised as "community high schools" will have other community activities available during the school day. The design of the new Maybury Primary School will be discussed with the community at the statutory consultation stage. No modification proposed. **(1789 Corstorphine Old Parish Church)**
- The proposed Sch 6 Maybury is a three stream school with a 60/60 nursery. No modification proposed. **(1955 Royal High School Parent Council)**

Reporter's conclusions:

General

1. The housing land requirement is set out in SESplan. The associated Supplementary Guidance (Housing Land November 2014) breaks down the requirement for each of the council areas including the City of Edinburgh. There is a statutory requirement for this local plan to demonstrate consistency with SESplan. In this context the proposed plan must identify a corresponding supply of housing land which should be effective or capable of becoming effective over the plan period.

2. These matters are assessed in more detail through my conclusions on Issue 5. I

recognise the importance of the city's significant brownfield resource in providing future housing and enabling regeneration of the waterfront and other areas. However, I also accept that given the extent of the housing land requirement and the often long lead in times/high costs of delivery associated with brownfield sites these would not alone provide for timeous delivery of the housing target. My assessment through Issue 5 demonstrates the requirement for green field sites to contribute to the housing land supply if the SESplan targets are to be met.

3. The National Planning Framework 3 and SESplan recognise the role of West Edinburgh as a focus for growth. Public transport improvements including the Edinburgh tram and the Edinburgh radial bus route will enhance the accessibility of this Strategic Development Area as a focus for housing and employment growth.

4. SESplan through paragraph 130 states that local planning authorities should seek to minimise the loss of land from the Green Belt whilst balancing the need to achieve sustainability objectives (see also Issue 2). Where development in the green belt is required to achieve the strategy, effort should be made to minimise the impact on Green Belt objectives and secure long term boundaries. Scottish Planning Policy in paragraph 50 states that "In developing the spatial strategy, planning authorities should identify the most sustainable locations for longer-term development and, where necessary, review the boundaries of any green belt." Whilst the objective of retaining long term robust boundaries for the green belt applies the proposed plan must respond to the strategic development requirements as established through SESplan. I have addressed the issue of added flexibility in the land supply (currently 10%) through my conclusions on Issue 5.

5. The sites at Maybury (HSG19) and Cammo (HSG 20) are located in West Edinburgh and have an indicative capacity of 1700-2000 and 500-700 respectively. Delivery would make an important contribution to the strategic housing land requirement. However, these allocations require removal of a substantial area of previously established green-belt and the formation of new green belt boundaries. Representations consider the green belt in this area is long established and that its loss is not justified.

6. On the issue of infrastructure provision, development on this scale would require improvements to the road network, public transport, schools provision and possible associated community and health facilities. SESplan Policy 9 requires local development plans to provide policy guidance that will require sufficient infrastructure to be available, or its provision to be committed, before development can proceed. The council's site assessment and the action plan, which has been prepared to accompany the proposed plan, seek to address these matters. However, there is local concern about the sufficiency of these provisions and how and when they might be delivered.

7. The council's officer response is that the identified constraints can be addressed and appropriately mitigated and that inclusion of these sites is justified to meet the strategic housing land requirement. This reflects inclusion of the sites in the proposed plan and represents the settled view of the council.

8. The Capital Coalition Motion forms part of the examination documents and the relevant sections are summarised in this Schedule 4. However, this does not change the position that the plan, as submitted for examination, presents the settled view of the council. The committee expressed a view that there was some merit in the representations on this issue. However, the committee did not direct that the plan be modified prior to submission to this examination. Other representations also point to

more suitable sites including the suggested sites at Craigiehall and at East of Millburn Tower.

9. My conclusions assess the merit of the representations referenced in this schedule 4. My focus is on the sufficiency of the plan rather on the assessment of whether an alternative site, such as that East of Millburn Tower, would be preferable. My remit would only enable a recommendation to remove sites from the plan if I were to conclude that they were unacceptable when assessed against the relevant planning issues raised in representation. My conclusions on Issue 5 and the identified shortfall in the land supply point to the need to add to the housing land supply. This conclusion would not support a scenario whereby one acceptable housing site was replaced by another, even if it were demonstrated to be preferable.

10. The sites at Maybury (HSG19) and Cammo (HSG20) were selected through the council's assessment process. This established a range of criteria against which the suitability of sites for inclusion could be assessed and compared. The criteria used for the housing site assessments are set out in Tables 6 and 7 of the Environmental Report (Volume 1). The council has assessed the site at Maybury through its Environmental Report Second Revision Volume 2, June 2014, under the headings West of Turnhouse Road and East of Turnhouse Road and the Cammo site under the heading West of Maybury Road. For sites selected and allocated in the plan, a separate, statutory assessment of their likely environmental effects is set out in Appendix 3 of Volume 1 of the Environmental Report.

11. In responding to the matters raised in representation on these sites I have drawn on these assessments along with the Habitat Regulation Appraisal and The Proposed Action Programme May 2015. The council's Transport Appraisal March 2013 and addendum 2014 are relevant to my consideration of transport impacts and mitigation. The Revised Education Appraisal June 2014 as corrected in September 2014 is also relevant. I have also considered the supporting documents lodged by West Craigs Ltd in relation to part of HSG19 and on behalf of Taylor Wimpey as well as the additional submissions from Mrs Una Robertson, the Cockburn Association, Colin Keir MSP and the Scottish Environmental Protection Agency. The council's submissions of 7 October 2015 in response to Further Information Request 3 are relevant to my considerations regarding delivery of the required infrastructure. There is considerable cross over between the issues raised on these sites and the more general conclusions reached through Issues 2, 5, 19 and 20 including the matters discussed at the hearings on 18 and 19 November.

12. I note that a planning application for outline planning permission was lodged for the site at Cammo. This was the subject of a report to Scottish Ministers. The consequent decision was to dismiss the appeal on the basis that that the wider transport infrastructure implications of the proposed plan, including the cumulative effects of this and other proposed allocations on transport infrastructure in the West Edinburgh area, had yet to be considered through this examination. Consequently, the principle of development at Cammo remains to be determined through this examination.

13. I am also aware from the council's submissions that a planning application and subsequent appeal was lodged for part of the Maybury site referenced as West Craigs. The appeal was dismissed on similar grounds to the decision on Cammo. A number of the supporting documents relate to the smaller site at West Craigs including a transport assessment and residential density capacity analysis. Whilst I have considered all of these submissions my assessment is focussed on the larger site referenced as Maybury

HSG 19 in the proposed plan.

Loss of Green Belt

14. Both sites break into the green belt as established through the existing local plan. Assessment against the green belt objectives in paragraph 34 of the proposed plan and as reflected in Scottish Planning Policy supports such release only where consistent with the development plan strategy, where the quality, character and landscape setting of the city can be protected and enhanced and where access to open space is protected.

15. My conclusion through Issues 2 and 5 is that regeneration is an important objective and green belt can assist in focussing development within the city and on brownfield sites. However, the strategy also requires the release of sustainable urban edge sites. I consider that the principle of green belt release in West Edinburgh and in particular within the Strategic Development Area is supported through the development plan strategy.

Green Belt – Maybury

16. The site at Maybury (HSG19) is low lying and open agricultural land. Other than on approach by rail it is not generally visible or prominent on approach to the city or significant in views towards recognised landmarks. The industrial estate and residential development at West Craigs already infringe on this area and create an indistinct edge to the established green belt.

17. On my site visit I noted some more elevated sloping ground to the north of Turnhouse Road. This is more widely visible in terms of the city's setting. In this context, the council recognises that the site's upper ridgeline is considered unsuitable for development. The additional height of dwellings would be conspicuous in this elevated location in views from Maybury Road, planned vistas towards Corstorphine Hill, from the International Business Gateway and in southward views to the Pentland Hills from Cammo's southern parkland. In addition, development would be visible in local views from Turnhouse Road and to those travelling on the Edinburgh-Fife railway.

18. I consider the identified landscape impacts on the rural setting of the city must be balanced against the need to meet the identified housing requirement and in the context of the changing character of west Edinburgh. Proposed development along the Glasgow Road will establish a more urban character to this edge of the city and enable enhanced public transport links.

19. I recognise that the potential for landscaping within the site at Maybury may be limited by the constraints of proximity to the airport in terms of the risk of bird strike. However the main line railway would form a distinct boundary to the south and the change in levels combined with proposed new planting should establish a strong new boundary to the north. A new woodland and grassland habitat 30 metres in depth is proposed along the new green belt boundary to the north along Craigs Road. The avoidance of higher ridge line development and height restrictions on development on the higher ground to the south of Craigs Road, as set out in the site brief (pages 52 and 53 of the proposed plan), should achieve a development that can integrate well with the existing built up area.

20. Proposed master-planning, to complement the strategic urban design and landscape frameworks for the International Business Gateway (IBG), would help address and

enhance the integration of development with the railway, airport infrastructure and existing industrial uses. The character of the countryside is already subject to significant change and the area is recognised as a sustainable location within the Strategic Development Area. I find these considerations provide considerable justification to include this site. I note the Edinburgh Green Belt Study (2008) supports the principle of development on the south-west facing land with Lennie Hill and the ridge of West Craigs providing a robust northern greenbelt boundary, where woodland could enhance landscape character.

21. I consider that the current enclosed farmland has limited recreational value although it does provide a locally valued rural setting to surrounding residential areas and to the Cammo estate. The proposed site brief on page 53 of the plan shows a green corridor of 30 metres in depth. This is to provide a pedestrian and cycle link through the site to Cammo Estate. I consider that the loss of this site would not compromise the role of the remaining green belt in providing access to open space and the countryside.

22. Taking all of the above into account my conclusion is that inclusion of the site at Maybury would be in accordance with the SESplan strategy which accepts modification to the green belt around Edinburgh where impact on green belt objectives can be minimised and long term boundaries can be secured (paragraph 129,130 and Policy Env 12).

Green Belt- Cammo

23. For the site at Cammo (HSG20) I accept that the existing green belt is well defined along Maybury Road and through the planting bordering the Bughtlin and Drumbrae housing estates. The proposed site currently provides a clear distinction between town and countryside and affords open views towards the rising land beyond and to Cammo Water Tower and Mauseley Hill. I note these are within the designed landscape of Cammo Estate where the inventory site is proposed for designation as a Special Landscape Area to include the water tower, the wooded roundel on Mauseley Hill and Criagiehall Temple together with its farmland fringes which have intact 18-19 century field enclosures.

24. Scottish Planning Policy refers to the establishment of clearly identifiable visual boundary markers based on landscape features such as rivers, tree belts, railways or main roads. Hedges and field enclosures will rarely provide a sufficiently robust boundary. In this respect I consider the lack of an established new green belt boundary along the sites west and south boundaries is a weakness of the site. A new robust boundary will take time to establish. The proposed new green belt boundary would initially rely on landform with the change of levels towards Cammo Walk and the ridge of West Craigs to the south. I accept the boundary could be re-enforced over time through planting. In this respect I note the site brief on page 53 of the proposed plan shows new woodland of 40 metres in depth along these boundaries.

25. I have considered whether the remnant hedgerow referred to in representation provides a more suitable green belt boundary. This would reduce the size of the site but I consider it effectively subdivides the fields and is unlikely to prove robust in the long term as the remaining site would form a relatively discreet parcel of land subject to further development pressure. The boundary as shown in the proposed plan follows the line of the burn and provides a more established and robust boundary particularly if this planting is further enhanced by new woodland as proposed in the development brief. I consider the larger site area provides more scope to accommodate housing whilst enabling a

layout which should respond to its location with important views into the designed landscape. Consequently I consider the current boundaries of the site are appropriately retained as shown in the proposed plan.

26. I agree with the council that the site can be integrated into the urban area particularly from the north of the site where there is already existing housing development. The housing along this edge already extends to the west of Maybury Road. Landform would limit visual impacts upon wider views of the landscape from western approaches to the city of the A8, A90 and Edinburgh-Fife railway line. I do not consider that the proposal would have a significant adverse impact on the setting of the city or its key views.

27. However, I do accept that the proposal would have a significant local landscape impact. The site contributes to the landscape setting along this urban edge and retains an open foreground in views towards Cammo Tower and Mauseley Hill. I am conscious of the need to create a development which reflects the context of the Designed Landscape to the west and enables views through the site to identified landmarks. I consider this could be addressed to some extent by an internal layout and landscaping scheme to enable views through to these focal points. I note this is referenced in the site development principles.

28. The council considers that an appropriate layout can be achieved whilst retaining a relatively high capacity of 600 houses. Whilst I have no definitive evidence to the contrary I note that the adjacent housing is not of a particularly high density. However, the density is indicative at this stage and will be tested through the master-plan and detailed planning stage. I do not consider that a higher density should be pursued across the whole site if this were shown to be to the detriment of the wider development principles of the site including the need to retain key views. I return to the matter of density below.

29. There is opportunity to link through the site to Cammo Walk and the parkland beyond and to provide pedestrian connections to Bughtlin and Drumbrae to the east. In this context, I consider the proposed development has opportunity to provide access to the countryside.

30. New long term boundaries for the green belt could be established and development at this location would not have an unacceptable impact on the landscape quality, the character and setting of the city as a whole or on recreational access. I consider that there would be a local landscape impact but, with appropriate mitigation, this would not be unacceptable in the context of SESplan. Its strategy accepts modification to the green belt around Edinburgh where impact on green belt objectives can be minimised and long term boundaries can be secured (paragraph 129,130 and Policy Env 12).

<u>Transport Impacts- General</u>

31. In terms of transport issues the text of the proposed plan (paragraph 116) states that the transport interventions necessary to mitigate the impacts of new housing proposals in West Edinburgh have been identified through the Local Development Plan Transport Appraisal.

32. The Transport Appraisal March 2013 has a 2014 addendum which was produced to assess the impact of increased capacity estimates on sites. This included an increase of 426 units over the whole Maybury site and an increase from 500 to 600 for Cammo.

33. The appraisal explains the focus on reducing the need to travel by car and enhancing transport choice rather than focussing on road capacity interventions. The assessment forecasts that the A8 Glasgow Road is likely to experience traffic growth of 14.5% if all development in the proposed plan is complete by 2025. Impacts would focus on the junctions with Maybury Road and on Gogar roundabout. The addendum to the transport appraisal notes that this impact would increase with the significant addition to the Maybury site capacity as well as the new sites at Queensferry. The appraisal recommends specific transport interventions to mitigate the identified impacts.

34. The Proposed Action Programme May 2015 translates this assessment into strategic infrastructure actions- where multiple developments should contribute to delivery of these actions. In these areas contribution zones are established to secure developer requirements. These actions are referenced through Table 9 of the proposed plan as proposals T17 Maybury Junction, T18 Craigs Road Junction and T19 Barnton Junction.

35. For Maybury Junction the action programme references increased junction capacity, including consideration of access from Turnhouse Road, traffic signals, the provision of bus priority and better provision for pedestrians and cyclists. Delivery is attributed to sites at Maybury, Cammo and South Gyle.

36. For Barnton Junction the actions include increased junction capacity based on increasing the efficiency of the traffic signals through installation of MOVA (Microprocessor Optimised Vehicle Actuation). Again these actions are attributed to all three sites.

37. For the Craigs Road Junction the actions include improvements to Craigs Road and increased junction capacity/bus priority at the junction with Maybury Road. New signalised cross roads allowing bus, pedestrian and cycle access to and from Craigs Road are also referenced. I note that these actions are also attributed to all three sites although the Transport Appraisal only references this action in relation to Maybury.

38. Appendix D of the council's Further Information Response October 2015 gives further detailed information on the required transport mitigation. This provides greater clarity on the relationship between the transport proposals in Table 9, the site specific requirements for Maybury and Cammo and the timing of delivery:

> **T17:Maybury Junction**. Progress to date is that a junction design has been carried out and validated but that a full civil design is still required. This will require changes to general vehicular access along Turnhouse Road so the timescale is likely to be dependent on the implementation of street links through to Craigs Road as part of the Maybury proposal. Financial contributions would be sought at regular stages of the build out of both Maybury and Cammo as well as from the site Del 5 Ed. Park/S.Gyle. The council's view is that this should not delay development on the site as the works could be progressed during development of these sites.
>
> **T18 Craigs Road Junction** A junction was designed as part of the planning application for adjoining land: (14/03502/PPP) eastern part of Maybury site for up to 250 units. The application has been refused but the council considers the submitted junction design acceptable. A full civil design is required. Again contributions would be sought from all three sites and the junction upgrade is required to access the HSG 19 Maybury site.

T19 Barnton Junction Action costed as part of Transport Appraisal for the nearest development (HSG 20 Cammo) Developer design requires validation. Full civil design to be completed. Ducting, traffic survey, civil design to be completed. The council's submissions state that this requires to be implemented early on in the delivery of the housing.

39. The remaining transport interventions rely mainly on specification through the action programme although some are included in the development principles for the site.

Transport Mitigation - Maybury

40. The council's transport appraisal recommends particular interventions for Maybury which include:

- Access from Turnhouse Road where a number of accesses would be required and from Craigs Road,
- Contribution to Maybury Road Junction enhancement scheme
- A lower speed limit on Turnhouse Road
- The upgrading of Craigs Road and Craigs Road/Maybury Road junction including pedestrian/cycle crossing facility.
- A contribution to help provide a Barnton Road Junction enhancement scheme
- Provide new bus infrastructure on internal roads and Maybury Road.
- New pedestrian cycle link to Gogar Interchange including footbridge across railway-line.
- High quality pedestrian and cycle routes within the site.

41. The addendum, in assessing the impact of increased capacity at Maybury, states that it would be even more essential to help provide the Maybury and the Barnton Junction Improvement scheme. It also states that consideration needs to be given to providing some local services within the development sites to reduce the need for some travel trips.

42. Having assessed the relevant submissions to the hearing I find that with some slight variation in wording these interventions are in part referenced in the development plan through table 9 and the site development principles. However, much of the required mitigation is only apparent when the plan is read alongside the action programme.

43. Concerns are raised about the amount of traffic using Turnhouse Road to access the airport cargo facility. Alternative access provision through the airport is suggested. I appreciate that there may be some conflict between commercial vehicles and increased use of this road by residents of the new housing along with increased impact on existing residents. However, a detailed assessment of local transport impact would be required in order to fully understand the nature of such localised impacts and how they might be addressed. This would be required as part of the master-planning process when the details of the configuration of the local road network should be determined and appropriate mitigation addressed.

44. I note that representations indicate the need for much more significant improvements including a road crossing of the railway and a major upgrade to the junction if congestion and current access difficulties are to be addressed. I note reference to existing queuing times for local residents as well as significant concerns

about road safety and air quality issues. These impact on the operation of local businesses, long travel to work times for local residents and raise health concerns due to recorded pollution levels. Reference is also made to the extent of traffic connected with the air cargo operations at Turnhouse, the possibility of future expansion and the potential for unacceptable use of the minor road network along Cammo Road and Lennymuir. Concerns are also raised by the residents of Lennie cottages given the proposed future use of Craigs Road as a main local distributor road, by residents of West Craigs who use the existing Turnhouse Road access and from the residential area to the east which takes access onto Maybury Road at the Craigs Road junction.

45. Individual developments, can only be required to address mitigation where there is a direct causal relationship and where any contributions are necessary for the development to go ahead. However, this does not signal, as the council's response appears to suggest, that development can go ahead so long as the required works are affordable and can be provided at some future date. Rather I consider it means that the mitigation required to address any unacceptable individual or cumulative impact of the proposal must be appropriately and timeously addressed whether that be through developer contributions or other funding sources. In this respect I consider that the council's approach requires some refinement and that further detailed assessment of individual and cumulative transport impacts is required to ensure that this proposal avoids any unacceptable traffic impacts on the local road network and beyond. I return to these matters in my conclusions below.

46. Matters of detailed layout and design including the configuration of the local road network will fall to the master-planning and development management process. However, I consider that it will be important that a master-planned approach is taken to the site as a whole to avoid a piecemeal approach to development which could compromise a coherent approach to design and delivery of the necessary infrastructure. The detail of Craig's Road and its configuration with regard to Lennie Cottages would be matters for such further consideration.

47. The proposed plan does not specify the junction solution for Maybury Junction. There is nothing in the plan which specifically references turning restrictions onto Maybury Road and this would again be a matter for the detailed planning stage as would the need for more localised traffic management measures or road closures. I understand the logic of the suggestion that a new road bridge over the railway could alleviate the traffic impacts of the proposal particularly for existing residents at West Craigs. However, I consider this would be a significant if not unviable cost which would divert rather than address traffic impact. I consider contributions are more appropriately focused on enhanced pedestrian and cycle access to public transport provision.

48. The backers of the site question sole responsibility of the site in paying for the footbridge over the railway. It is certainly referenced in the plan as a principle of development of the whole of the HSG 19. I agree that it is important to secure this linkage to the public transport hub at Gogar. My view is that this is justified in order to decrease reliance on car trips. Given the proposed cycle/pedestrian linkage from the proposed footbridge through HSG 19 to Cammo, I can appreciate some basis on which to seek joint contributions. However, the necessity is much clearer in the context of Maybury. The relatively smaller scale of Cammo and its distance from the bridge makes a contribution more difficult to justify particularly as it is already required to contribute to enhancement of off-site cycleway/footpath links. The site brief identifies a requirement for a new pedestrian route at Cammo Walk in relation to the developments at Maybury

and Cammo. Consequently, I am not persuaded that any change is required in this respect.

49. On a related matter I note that Network Rail point to the need to provide a bus stop and turning facility with shelter to be provided north of the proposed Gogar interchange. I consider that this is matter which may be of relevance to achieving enhanced public transport access and modal shift targets. However, given that the justification for this is not clear at this time I agree with the council this would be a matter for further consideration through the master-planning process.

50. Whilst I note the viability of a community focal point is questioned justification for this in terms of reducing the need to travel is contained within the council's transport appraisal. I appreciate there may be difficulties in securing such provision in the early phases. However, I think this is an important objective in creating a sustainable community in this location. Consequently, I consider that the community hub should continue to be referenced in the development principles. I agree with the council that housing proposals should not preclude the inclusion of retail or commercial use subject to appropriate design and local impact considerations and these would fall to be considered through the relevant policies in the plan.

51. In a similar vein representation questions inclusion of the final bullet point in the development principles which references co-ordination with neighbouring employment uses. There may be no clearly stated future intentions from these uses at this stage. Nonetheless, I consider that these areas have potential to contribute to quality of place and an enhanced mix of uses. Consequently, I consider that the potential for re-configuration and/or redevelopment/enhancement of these areas should not be ruled out at this stage and should be further considered through the master-planning process.

Transport Mitigation - Cammo

52. For Cammo the council's transport appraisal refers to:

- Access from Maybury Road – two junctions, with traffic signals
- Improved bus infrastructure and services on Maybury Road
- Contribution to the Maybury Road junction enhancement
- Signal controlled pedestrian crossing on Maybury Road
- Improved bus services
- Reduced speed limit on a section of Maybury Road
- Provision of a Barnton Junction enhancement scheme.

53. The addendum in assessing the impact of increased capacity at Cammo states that the proposed increased scale of development would mean it is even more essential the site is directly served by bus services, with suitable routing, capacity and frequency.

54. The development principles for the site on page 52 of the plan state that the site layout should provide maximum accessibility by public transport including direct pedestrian links to enhanced bus infrastructure and services on Maybury Road and to the north east corner of the site to minimise distance to bus stops for services along Queensferry Road.

55. Reference to planning appeal reference PPA-230-2134 confirms that Transport

Scotland had no objection to the proposal. The appellant's transport assessment concentrated on local roads rather than on the trunk road network, the nearest elements of which are the M8 and A720(T). However, it is satisfied that potential trunk road impacts, in terms of traffic, noise and air quality effects, would be small.

56. Having assessed the relevant submissions I find that with some slight variation in wording these interventions are in part referenced in the development plan through table 9 and the site development principles. However, much of the required mitigation is only apparent when the plan is read alongside the action programme.

57. Through the hearing process the intended contribution from Cammo (HSG20) to the Craigs Road junction was questioned. This is one of the proposed access points into the Maybury site so I can understand that the relationship is likely to be less direct. I also note that this intervention is not based on the conclusions of the council's transport appraisal which only references a lower speed limit on Maybury Road and enhancements to the Maybury and Barnton Junctions.

58. Representations raise concerns about local access issues and the sufficiency of the proposed mitigation. Submissions indicate the need for more significant improvements with reference to existing queuing times for local residents and significant concerns about road safety and air quality issues. These are stated to impact on the operation of local businesses and long travel to work times for local residents who already live to the east and west of Maybury Road. Consequent traffic increases raise access and health concerns. There are also concerns about the potential for rat running along Cammo Road and a consequent lack of parking given increased recreational use of Cammo Park. I note that the plan references changes to Cammo Walk and the site brief references a new footpath/cyclepath in this respect but I consider that the detail of this provision would remain to be determined through the planning process.

59. Some further detailed assessment of the transport impacts of this site has been carried out in the context of the previously submitted planning application. Neither Transport Scotland nor the council as roads authority objected to its terms. Adoption of this local development plan will confirm the allocation of this and other sites in West Edinburgh. However this will not negate the requirement for any future application to address impacts on the operation and safety of the local road network or the cumulative impacts of committed development. The site development principles address some of these matters and I return to these matters below.

<u>Conclusions on transport Impact</u>

60. Drawing all of this together, I understand the significant concerns about traffic impact in what is without doubt a congested area of the city. Inevitably a growing city has to deal with significant traffic growth. One of the main ways to address this is to direct future development to locations which enable other transport choices rather than reliance on the private car. In this respect I consider the sites are very well located in an Edinburgh context to enable good accessibility by public transport including the new tram route and the proposed Edinburgh Gateway train/tram interchange at Gogar. This reflects the emphasis of Scottish Planning Policy and the council's transport appraisal. Nonetheless, I accept that these two sites, along with the other proposed development sites in West Edinburgh, will have a significant impact on the road network.

61. To address these impacts the council has identified a range of interventions as

detailed above. Reference to the conclusions in Issue 19 casts some doubt on the sufficiency of the council's approach to transport appraisal and the consequent adequacy of the proposed mitigation. However, further work has been done to progress the detail of planning applications and I find no substantive evidence that transport impact cannot be appropriately mitigated. The currently proposed interventions to mitigate transport impact are as referenced above.

62. I find that given the accessibility of these locations by alternative modes of transport and the potential for mitigation the traffic and road safety concerns raised in representation do not justify deletion of either of these housing sites. However I consider further assessment and clarity on the approach to this mitigation is required.

63. I can understand the concerns of local residents given the extent of housing proposed and current congestion levels. Drawing on the conclusions in Issue 19, I consider that whilst the relevant actions should be identified in broad terms within the plan there should be a clear requirement for further assessment taking into account all known development and cross boundary impacts so that the full extent of any necessary design improvements can be addressed. I consider that the required mitigation is fundamental to securing the acceptability of these proposals.

64. In this context, I note that the main interventions are listed through reference to Table 9. However, for most of the other mitigation requirements the reader must reference the Action Programme which is not part of the proposed plan subject to this examination.

65. Whilst the action plan is a useful mechanism and can be updated annually the proposed plan, as subject to this examination, should clearly establish the principle development requirements for these sites (see also Issues 5 and 21). My recommendation to include General Development Principles for West Edinburgh brings together the various items of infrastructure that are likely to be required to mitigate the identified cumulative transport impacts and includes details of the need for further assessment. Site specific transport mitigation is included in relation to each of the sites. My conclusion is that the development principles for the site should be expanded to include a more comprehensive guide to the matters to be addressed through the master-planning and development management process. Whilst further assessment is required and detailed Supplementary Guidance is to be prepared I am satisfied that the plan as modified would provide an appropriate framework to ensure that transport issues for these sites are sufficiently addressed.

66. There is also an unresolved question as to whether the site at Cammo should be considered in cumulative contributions for improvements to the Craigs Roads Junction. I have addressed the uncertainty about the Craigs Road junction by adding flexibility to this requirement should further assessment prove such a contribution proves unjustified in the context of Cammo. Whilst not subject to representation the council may also wish to note the similar circumstances which apply in relation to the reference to a contribution from Edinburgh Park/The Gyle.

Education Impacts

67. Other representations question how education provision will cater for a significant increase in housing in this location given that local primary and secondary schools are perceived to be at or close to capacity. The plan refers to infrastructure improvements

and refers to the action programme in detailing these. Table 5 on page 28 of the proposed plan includes school proposal SCH6 Maybury - a new primary school in conjunction with housing growth in west Edinburgh. Paragraph 100 of the plan refers specifically to the action programme setting out requirements for school facilities.

68. Reference to the most up to date version of the action programme highlights the significant investment involved in providing new school provision and extending existing facilities including the proposed new Maybury primary school but also extensions to other primary schools and West Edinburgh High Schools. The significant indicative costs of these proposals illustrate the extent of investment required to address delivery of the required education facilities. Reference is made to feasibility studies to determine how extensions to Forrester High School/Craigmount High and The Royal High might be delivered. The evidence for these actions is drawn from the council's Education Appraisal June 2014.

69. Other than to show the proposed site of a new school at the south east corner of the Maybury site, the development principles and site brief as included in the proposed plan make little reference to these wider requirements. The action programme indicates that a cumulative assessment area would apply to developer contributions from Emp 6 IBG, (HSG 19) Maybury, HSG 20 Cammo and Del 5 Edinburgh Park.

70. Through Further Information Request 3 Appendix F the council list the number of houses that could be delivered on sites in West Edinburgh prior to delivery of the proposed new and extended schools. This indicates that 550 dwellings would be built prior to delivery of the Maybury Primary School and over a 1000 prior to the proposed high school extensions.

71. The council's additional submissions reference an assumed trigger point to determine when the new infrastructure would be required. It is assumed that the new infrastructure would require to be completed for the August in the financial year in which the 30% trigger on pupil generation has been reached. The expected completions on sites, as derived from the 2015 housing land audit (Appendix G of Further Information Request 3), highlights the date by which the new school would be required. For Maybury Primary School this is indicated as 2020/21 which would allow a few years lead in time for the school to be provided. The secondary school extensions are highlighted as being required by 2020/2021. However such an approach is not currently transparent from the proposed plan.

72. The council accepts that proposed housing will add to significant rising rolls and the need for additional school space. It considers that a lead in period of 3 years would allow for the planned provision of the required school infrastructure. The council accepts a potentially significant funding gap between the required works and the anticipated level of developer contributions. However, it states that recognised financial constraints can be addressed through forward and gap funding.

Conclusions on Education Impacts

73. I have no technical or expert evidence to dispute the confidence of the council, as education authority, that identified education impacts can be appropriately addressed. Consequently, I find no basis to conclude that these matters justify deletion of this site. However, this conclusion does not negate the emphasis that I consider should be placed on the appropriate and planned provision of this necessary infrastructure.

74. In this context, I consider the proposed plan lacks detail on how this constraint is to be addressed. I believe that such detail is required in order to give confidence to the local community and others that schools capacity issues will be addressed.

75. The proposed mitigation applies to various sites in West Edinburgh. Through issue 21 it is recommended that the various education actions are brought together in Part 1 Section 5 of the plan under the heading General Development Principles. My recommendation include a cross reference to these General Development Principles within the site brief for this site. It is also important that these actions and the council's approach to timeous delivery are further clarified. This will require Supplementary Guidance to provide greater clarity about the mechanisms, timing and funding of delivery. These matters are addressed through the conclusions and recommendations on Issue 21.

Community and other facilities

76. Paragraph 72 of the proposed plan recognises the implications of the proposed plan for the provision of primary healthcare and other community health services. Policy Hou 10 on Community Facilities is relevant in this respect and states that planning permission will only be granted where there are associated proposals to provide any necessary health and other community facilities. The site brief for Maybury identifies an area for commercial and retail opportunities in proximity to the proposed new school and the development principles refer specifically to healthcare facilities. I agree with the council that this may provide an opportunity to locate a new health practice and/or other community facilities. Such delivery will require collaborative working between the council, its community planning partners and the developer. This will require further consideration through the master-planning/planning application process.

77. Discussions are on-going between the council and NHS Lothian to assess the need for new and expanded general practitioner practices to accommodate the planned housing growth set out in the Second Proposed Plan. However, no specific actions have been included at this time and this matter is not referenced in the development principles.

78. My conclusions on Issues 5 and 21 recognise the importance of the appropriate provision of community facilities such as health. Additional text is recommended for inclusion in Part 2 section 1 of the plan to explain that whilst developer contributions may be sought these should be considered in the context of any particular proposal. There is a lack of current evidence on this matter. There is currently insufficient information/justification to include reference to required developer contributions towards the wider provision of other community facilities including health on this site. Consequently I am content that this matter is left to be further considered through the master-planning and planning application process in the context of the relevant policies of the plan.

Loss of Agricultural Land

79. Extension of urban areas will inevitably encroach on agricultural land. Scottish Planning Policy (paragraph 80) seeks to protect prime quality farm land but recognises that loss of this land may be justified as a component of the settlement strategy. I have no evidence that this land is of particular local importance for agriculture and I do not consider that deletion of these sites would be justified on this basis.

Nature conservation impacts

80. I appreciate the local value placed on these fields and its nature conservation interest. However, Policy Env 6 would apply the necessary protection to any species protected under European or UK law. Whilst the proposal would result in the loss of green space there is nothing to suggest that these agricultural fields present a particularly unusual or diverse habitat. I have no information to suggest they are of particular biodiversity value or that this would be lost if replaced by houses and gardens.

81. One of the objectives of the Strategic Environmental Assessment is to 'Protect and enhance biodiversity, flora and fauna, and habitat networks'. The Strategic Environmental Assessment's findings are available in the Environmental Report. Volume 1 page 34 sets out the method of assessment, which uses the maps in Volume 2 (page 3). The relevant findings are set out in Volume 1 where the conclusion is that these allocations do not have a significant harmful effect on biodiversity, flora or fauna. The HRA references supporting habitat for the Firth of Forth Special Protection Area include curlew, oyster catcher, redshank and lapwing. However, it states that due to distance from the coast there is no likely significant effect arising from housing allocations.

82. Drawing on the above my conclusion is that the allocation of these sites would not result in any significant adverse effect on nature conservation interests. Detailed proposals fall to be considered in the context of the all the relevant policies of the local development plan including Polices Des 3 and Des 9 which both reference the need to further the conservation of biodiversity.

Drainage and Flooding

83. For Maybury (HSG19) the Scottish Environment Protection Agency (SEPA) advise that flooding from any future diversion of the Gogar Burn would need to be considered and should not create flooding issues elsewhere. The 1:200 year flood map shows there may be a small risk of flooding on the eastern boundary of the site and this should be investigated further. However, for this site there is no stated requirement for a flood risk assessment to be included in the development principles for the site.

84. For HSG20 Cammo the Scottish Environment Protection Agency recommends that the development principles should be updated to include a requirement for flood risk assessment to inform the site design and layout. A flood risk assessment is required to assess the actual flood risk from the Bughtlin Burn and tributary. This would need to include any culverts into or downstream of the site. Review of the surface water flood map shows that there are large areas of surface water flooding which should be assessed.

85. I note that the site development principles for Cammo reference the need to 'improve the quality of the water environment through works to re-align and improve the bank side treatment of the Bughtlin Burn'. This principle is included to address the advice of Scottish Environmental Protection Agency as a Strategic Environmental Assessment Consultation Authority at the Main Issues Report stage, in line with the objectives of the European Water Framework Directive. I understand this reflects the artificially channelled condition of the burn in this location and the poor ecological status of the River Almond, to which it forms a tributary. Consequently, I find no reason why this principle should be removed.

86. I also note that the council rely on Policy Env 21 on flood protection which states that planning permission will not be granted on sites that would increase the risk of flooding or be at risk from flooding or where sites are in areas of importance for flood management or where prejudicial to existing or planned flood defences.

87. Whilst policy Env21 provides for flood protection, Scottish Planning Policy through paragraphs 260-263 highlights the role of development plans in addressing flood risk including water-course flooding and surface water. There is no suggestion from the available evidence that either site is at significant risk from flooding to an extent that would justify deletion. However, I consider that given the risk from the Bughtlin Burn and surface water flooding for Cammo it would be sensible to follow SEPA'S advice and include a requirement for assessment in the site development principles. For Maybury the requirement for assessment is more discretionary and may not be necessary. My recommended modifications reflect this. Water supply and drainage will be matters for the detailed planning stage in consultation with the appropriate authorities including Scottish Water and SEPA. There is no indication at this stage of any abnormal constraints in this respect.

88. With these modifications I am content that these issues can be appropriately addressed.

Density, landscaping and open space

89. As referenced above the density is indicative and will be subject to detailed layout and design considerations. Achievement of a range and choice of housing on the sites should enable the site to cater for a range of housing needs including lower density family housing. I agree with the council that the sites accessibility points to the potential to achieve higher densities. This accords with the relevant references in Scottish Planning Policy and through National Planning Framework 3. Consequently I find no basis at this stage to reduce the density to 1200 units.

90. The requirements for green networks, including urban edge treatments ranging in width from 30-50 are drawn from the Edinburgh Design Guidance. I consider this is justified on the basis of allowing space for trees to achieve maturity and to provide a green corridor for multi-user paths within new development. The green belt boundary allows for wetland habitat creation and improvements to the bank of the Bughtlin Burn, open grassland and a new multi-user path, alongside new woodland planting. A similar 30 metre boundary is proposed at Craigs Road to form a new green belt boundary along the existing ridgeline in order to provide a wooded backdrop to new development at Maybury. Given the clear reasoning for these requirements I do not consider they should be reduced or altered.

91. I understand the desire to include open space and tailor development heights and density to respond to the nature of the site. For Maybury this includes avoidance of the ridgeline and more elevated slopes as indicated in the development guidelines. For Cammo this includes the protection of key views. However, I agree with the council that any landscaping on frontages such as Maybury Road would serve a different function. It should help to integrate the development with the urban area rather than act as a barrier or screen. These matters all fall to be addressed at the detailed planning stage when the desired density would have to be balanced against other planning objectives and may be subject to change. On this basis I find no basis for change at this stage.

92. I understand the density assumption at Maybury was derived from multiplying the developable area of 62 hectares by the density range on page 28 of Volume 1 of the Environment Report (27.5 to 32.5 dwellings per hectare). I have addressed the matter of extending the site area in order to accommodate the indicative housing output of the site through Issue 14. National Planning Framework 3 paragraph 2.20 provides support for increased densities in key locations which are well served by public transport. West Edinburgh is one such location, and the good accessibility of part of the Maybury site is one of the reasons for its allocation in the Plan. Scottish Planning Policy in paragraphs 45 and 46 supports the use of higher densities to help achieve some of the six qualities of successful places.

93. There is no clear mechanism through which the planning authority can secure advance planting as this could only be secured under the terms of a planning application. The implications of layout and building heights upon the retention of views through the site would be assessed against the site brief as part of any planning application. In particular Policy Des 3 – Development Design – Incorporating and Enhancing Existing and Potential Features and Des 4 Development Design – Impact on Setting. (C) Landscape works in advance of development cannot be required through Planning Conditions, which meet the established tests set out in Circular 4/1998.

94. Open Space provision on both sites would fall to be considered in terms of the relevant plan policies (specifically Hou 3) and the standards set out in the council's open space strategy. In this respect I note the Maybury development principles reference 2 hectares to be provided as two areas of greenspace. For Cammo reference is restricted to the provision of the 40 metre green belt boundary and the provision of green network connections through the site. I consider this is justified given that there is currently no deficiency in terms of the Council's Large Greenspace Standard as set out in the Open Space Strategy for Cammo given its location relative to the Cammo Estate Park. Given there is no deficiency in this provision I agree with the council that it would not be appropriate to require developer contributions to enhance Cammo Park.

95. For the larger Maybury Site open space is however required due to its size and location relative to existing provision. The council's Open Space Strategy (2010) on page 22 identifies an existing deficiency in provision east of Maybury Road

96. Upon submission of a site masterplan, all these matters would be considered in detail through Design and Environmental policies, in particular Des 4 – Development Design – Impact on Setting, Des 8 – Public Realm and Landscape Design and Des 9 – Urban Edge Development. Site specific protection of trees would be considered against Policy Env 12 Trees. Consequently, my conclusion is that no change is required to address these matters.

Airport safety

97. I note that neither site is within the public safety zone associated with Edinburgh Airport which is protected through Policy Tra 11. I recognise the proximity of the airport to the Maybury site particularly the southern portion. Whilst this may require associated mitigation to deal with any potential noise and disturbance issues this would be subject to the normal requirements imposed by the council's Environmental Health Department. Housing in proximity to airports is not unusual. I appreciate the concerns raised but I do not consider that deletion of the site, to account for possible future objections and perceived limitations on the airport's expansion plans, could be justified. Potential impact

of aircraft noise would be addressed as part of the detailed planning process.

Air Quality and Pollution

98. I understand that Edinburgh has three Air Quality Management Areas (AQMAs): the City Centre designated in 2001, St Johns Road designated in 2003 and Great Junction Street designated in 2007. Monitoring has highlighted other areas that are exceeding the objectives and limit values, and this may result in further AQMA designations within the LDP area. I am not aware that these sites off Maybury Road fall within such an area although I note references to air quality concerns along Queensferry Road.

99. I note that the Environmental Report identifies air quality as one of the main environmental issues currently prevalent within the Council area (Volume 1, page 40). Housing on these sites and the associated transport movements will undoubtedly have impacts on air quality and pollution in an area already associated with traffic congestion. However, as stated above, I find no reason to conclude that the assessed traffic impacts would be unacceptable. Public transport accessibility will be key to minimising the pollution impacts of increased traffic and West Edinburgh, with programmed improvements, has a level of accessibility to public transport only likely to be rivalled by the city centre.

100. I understand that within Air Quality Management Areas the council has action plans setting out measures to help reduce vehicle emissions. The council's Local Transport Strategy (2014-2019) identifies a range of actions and policies to reduce emissions and improve air quality standards across the city. For these reasons, whilst I agree that these impacts are potentially significant, I consider there is scope for appropriate mitigation. Subject to such mitigation I am not persuaded that these concerns alone justify deletion of these sites.

Other matters

101. I have no detail of any radioactive waste disposal associated with Braehead Quarry I note that it is safeguarded as an existing waste management site. Consequently, Policy RS 2 on Safeguarding of Existing Waste Management Facilities states that development in the area immediately surrounding an existing or safeguarded waste management facility (as identified on the Proposals Map) will only be allowed if it is demonstrated that there will be no adverse implications for the approved waste handling operations. Paragraph 279 of the proposed plan references the need to avoid conflict between this use and the proposed housing by providing sufficient separation distance to avoid noise and air quality impacts. These would be matters to be determined at the planning application stage in consultation with the council's environmental health advisors.

102. Whilst I have no evidence of any health impacts which might arise for the radio mast on Craigs Road I note that it would be located within the 30 metre new woodland as shown on page 53 of the proposed plan. Consequently, I find no need for any change in this respect.

103. In my conclusions above I have made a number of references to further detailed consideration through the master-planning and planning application process. The text of the plan on page 52 references the need for master-planning and phasing of development. Representation on Maybury raises questions about the need for a master-plan given the potential for consequent delay. However this is a significant extension to

Edinburgh which would effectively form a new community. It has to address delivery of a primary school, a high quality environment and appropriate transport infrastructure including off site works. I would be concerned that a more piecemeal approach to development could undermine the planning principles for the site. The master-plan would form part of any planning application and should inform and assist with that process. I find no reason why it should lead to unnecessary delay. Consequently I find the reference to master-planning on page 52 of the proposed plan should be retained.

Representations opposed to SCH 6 Maybury in current form and seeking its removal and/or change

104. The site for the proposed new Maybury primary school is indicated in the site brief on page 52. This is shown in the south-east portion of the site adjacent to the proposed commercial/retail centre in order to create a community focal point and to secure accessibility to the Gogar interchange and Edinburgh Gateway Station. The school can have a wider community role and the design and detail of the school would be matters for further consideration. The location is indicative at this stage and can be confirmed through the master-planning process where issues such as safe and convenient access, including from Cammo, can be considered in further detail. Consequently, I recommend no change to SCH6 or to the way it is shown on the site brief on page 53 of the plan.

105. I note that representations for West Craigs request a text addition on page 28, paragraph 71 of the plan explaining that any requirement for a new or expanded school in relation to Maybury will be in the context of a full catchment review at the time of the housing coming forward. They request that text is added to table 5, SCH6, advising that the provision of a new primary school will be on the basis that full and up to date capacity information provided. Any school provision will only be necessary whereby there is a need resulting from the proposed development. However I consider this matter is appropriately addressed through Del 1 subject to the further detail to be provided through supplementary guidance. Consequently I am not persuaded that any change is required.

Overall Conclusion

106. My recommendations here and elsewhere in this report reflect the need to insure that the plan provides more clarity on the required infrastructure provision and other mitigation. This is addressed for West Edinburgh, including for Maybury and Cammo, through the proposed inclusion of General Development Principles along with an expanded policy on developer contributions to be supported through Supplementary Guidance. Other mitigation is addressed through the site specific development principles below and as already included in the plan. The action programme will then provide the means to monitor and manage progress towards timeous delivery of the required mitigation.

107. I understand that these proposals have caused significant local concern. However, there is a requirement for housing land that cannot be fully addressed on brownfield sites. My conclusion drawing on all of the above is that subject to the required mitigation these sites are appropriately retained for housing.

Reporter's recommendations

Modify the proposed plan as follows:

1. Add the following paragraphs to the section Maybury (HSG 19) Development Principles on page 52:

- Address the General Development Principles on transport and education for West Edinburgh (as set out in paragraphs 117-119)
- Address appropriate and safe access from Turnhouse Road and Craigs Road,
- Proposals should address a new footway/cycleway along the south-west side of Turnhouse Road and upgrading of the bus infrastructure on Turnhouse Road
- Address any identified impacts on the safe operation of the local road network
- Provision of new bus infrastructure on internal roads and Maybury Road.
- High quality pedestrian and cycle routes within the site.
- Further investigation/consultation is required to determine the nature of any flood risk on the site and whether further assessment and mitigation measures are required.

2. Add the following paragraphs to the section Cammo (HSG 20) Development Principles on page 52:

- Address the General Development Principles on transport and education for West Edinburgh (as set out in paragraphs 117-119)
- Appropriate access from Maybury Road including the potential for two junctions, with traffic signals,
- Safe pedestrian crossing of Maybury Road including the potential for a signal controlled pedestrian crossing
- Address any identified impacts on the safe operation of the local road network
- The finalised site capacity, design and layout should be informed by an adequate flood risk assessment.

3. In table 9 amend text in relation to T18 Craigs Road Junction to read "and possibly to Cammo (HSG 20)."

Issue 7 Appendix A HSG 19 Maybury	
0057 John Henderson 0058 Mary Henderson 0065 Linda Fullerton 0080 Aleksander Wito 0082 Beryl Sutherland 0123 James Sutherland 0191 Brian Maison 0295 William Burnett 0396 U Robertson 0402 Irene Brydon 0409 Sheila Simpson 0561 Alex Maltman 0597 Niketa Platt 0598 David Platt 0645 Anne Gumley 0705 Charlotte Macbeath 1040 Stephen Warwick 1109 Roy Ferguson 1190 Andrea Liu 1191 Eric Liu 1194 Douglas Anderson 1196 Sandra Cheung 1198 Kelly Liu 1201 E Symons	1207 A Krwawcz 1340 Robert Glen 1658 Jillian Glen 1732 Ruth Gladwell 1975 Ailsa Davidson 1992 Keith Doig 2002 Douglas Smith 2028 Lorraine Fraser 2043 Brooke Petterson 2044 Esther Petterson 2174 Stuart Young 2198 Hugh Davidson 2216 Anita Morrison 2300 Helen MacLeod 2330 Peter Widowson 2470 Charlie Youngs 2471 Evie Youngs 2472 Isla Youngs 2473 Katy Youngs 2474 Anna Youngs 2514 Bernard Matthews 2594 Andrew Bevan 2642 Liam Liu

Issue 7 Appendix B HSG 20 Cammo

0002	Anne Marquis
0008	Scott D MacMillan
0024	Brian Minshull
0065	Linda Fullerton
0066	Moira Willis
0080	Aleksander Wito
0082	Beryl Sutherland
0123	James Sutherland
0129	Mark Beautyman
0182	Alistair Hutcheon
0183	Grant McCulloch
0230	Graham Holden
0231	Alastair Thomson
0236	Kathy Thomson
0265	Mr & Mrs Ewing
0267	Allan Macleod
0270	Ray Heyworth
0277	Ian Massie
0281	Neil Petrie
0287	J Davidson
0288	Alan Campbell
0323	Bruce Patullo
0324	Ross Lennen
0326	Loiusa Lennen
0328	Ian Lennen
0330	Jeff Deherdt
0331	Lynne Deherdt
0334	Helen Robb
0373	Louise Taylor
0380	Jean Morley
0382	Malcolm Wright
0384	Alan Pithie
0385	Alisdair Pithie
0386	Maggie Pithie
0396	U Robertson
0404	Anne Benge
0427	Cynthia Jamieson
0437	M Gilmour
0443	Lesley Hoyle
0468	Steven Livingstone
0485	George Braithwaite
0487	Lindsay McEwan
0490	Michael Barrow
0501	Kenneth D Pye
0522	KJ Tait
0528	P & L Palumbo
0548	Alan Harrison
0549	Margaret Harrison
0561	Alex Maltman
1191	Eric Liu
1192	Gordon Cheung
1194	Douglas Anderson
1196	Sandra Cheung
1198	Kelly Liu
1201	E Symons
1204	Hilda Symons
1207	A Krwawcz
1340	Robert Glen
1349	Evelyn Buchanan
1352	Martyn Strachan
1658	Jillian Glen
1662	John Simpson
1681	Carol Abbey
1732	Ruth Gladwell
1745	Alasdair MacIntyre
1777	Cara McCulloch
1908	Jacquie Simpson
1956	Peter Malone
1960	S Watson
1971	Scott McCulloch
1975	Ailsa Davidson
1992	Keith Doig
2004	Armando and Giovanna DiTano
2014	Fiona Crutchfield
2022	John Allan
2028	Lorraine Fraser
2029	Frederick Neil Todd
2043	Brooke Petterson
2044	Esther Petterson
2057	Morris Lorimer
2058	John Lumsden
2068	Fiona Lumsden
2083	Carol Mackay
2094	Beatrice Buchanan
2114	Simon Jackson
2127	Claire Mellor-Clarke
2136	Sally Chalmers
2112	Lynne Young
2140	Angus Chalmers
2141	Rosina F Liston
2155	Jamie A Mackay
2157	Jet Cameron
2165	Alan Joyce
2180	Christopher Peace
2186	Christine Shaw
2198	Hugh Davidson
2207	Jim Baird
2216	Dr Anita Morrison

0567	James Helliwell
0570	Mairi Blackie
0571	Lesley and Barbara Bennie
0597	Niketa Platt
0598	David Platt
0645	Anne Gumley
0658	G R Barrow
0673	George Dennis Holmes
0700	William Eckford
0705	Charlotte Macbeath
0707	Lawrence Ellliot
0714	Gordon and Kathleen Clarke
0819	Hamish Duguid
0847	David Scott
0848	Sarah Scott
0928	W.B Campbell
0973	SR and AD Mackie
0975	Marilyn Barrett
1009	Pamela and Alisdair Mackay
1014	Carol Ann Smith
1026	Neil Bird
1040	Stephen Warwick
1050	Diamian Singh
1163	Lindsay David
1164	James McKean
1165	Catherine Wilson
1166	Linda Clarke
1167	Maria Wharton
1168	Winifred Joan Whyte
1171	George Whyte
1172	Lewis Thomson
1174	Dylan Egelstaff
1176	Fiona Cameron
1180	Fiona Kennedy
1184	Ronald Wharton
1186	Sue Warwick
1187	James and Rebecca Hardie
1188	George Preston
1190	Andrea Liu
2282	Leigh Hughes
2300	Helen Macleod
2305	Emily Liu
2309	Ewan Posey
2310	Suzanne Posely
2311	James Posely
2312	Leah Posely
2330	Peter Widdowson
2343	Marcel Guibout
2339	Anne Oliver
2347	Julie Kirby
2357	Claire Lumsden
2362	Madeline Johnston
2365	Owen Oliver
2366	Adam Oliver
2371	Derren Oliver
2372	Andrew Lumsden
2404	Colin Mackay
2415	Claire McDowell
2424	June Briglmen
2427	Byran Little
2430	Felix and Valerie Reid
2437	F Breckenridge
2470	Charlie Youngs
2471	Evie Youngs
2472	Isla Youngs
2473	Katy Youngs
2474	Anna Youngs
2508	Marion Finc
2541	J Breckenridge
2546	James MacPherson
2555	Iain Moffatt
2558	Juliet Wilson
2598	Lisa Egan
2606	Angus Egan
2620	Phoebe Egan
2605	Naomi Egan
2627	WR & MH Armstrong
2642	Liam Liu
2644	John Lumsden
2671	Ian Morrison
2720	James Tait

Issue 7 Appendix C - HSG 19 and HSG 20

0006	Gary Mill
0023	Warren Hope
0052	Peter Stamper
0067	Iain Cameron
0099	Esther Davidson
0111	Robert Hope
0142	R Brown
0192	Richard Adlington
0232	Fiona Constable
0253	Alan Horne
0266	Rhoda Macneil
0280	Pauline Hetherington
0297	Gadsbey
0309	Mr & Mrs Mackenzie
0315	Robin McLeish
0354	Charles Fraser
0464	E Young
0593	P Donnelly
0625	David Ewing
0659	David L Martindale
0691	Jayne Thorpe
0692	David Kidd
0701	Kirsty Eckford
0963	Robert Thomson
0992	Rosemary Steers
1029	Phyllis Melvin
1036	Vinod Vohra
1118	Mary Kidd
1120	Katherine Ross
1655	Fraser Smith
1731	Bill Smith
1957	Alan Shanks
1958	Louise Eckford
2036	Kim McCabe
2163	Jane Gould
2197	Sandra Fountain
2198	Hugh Davidson
2242	K Duckett
2260	Séamus McCabe
2292	Moira Kinnear
2450	Helen Kennedy
2464	Nick Gould

Issue 8	**New Greenfield Housing Proposals – SE Edinburgh SDA (1)**	
Development plan reference:	**HSG 21 Broomhills** **HSG 22 Burdiehouse** **SCH 8 Broomhills** **GS 9 Broomhills** **Part 1 Section 3 Table 4 pages 25 – 27** **Site Brief pages 60 – 61**	**Reporter:** Lance Guilford

Body or person(s) submitting a representation raising the issue (including reference number):

55 individuals seeking removal of HSG 21 Broomhills (see Issue 8 Appendix A)

38 individuals seeking removal of HSG 22 Burdiehouse (see Issue 8 Appendix B)

Organisations, elected representatives and individuals other than those in Appendices A and B

0054 Colin Kemp
0056 Joyce Kemp
0104 Karen Howe
0244 Tony Gray
0358 Gilmerton Inch Community Council
0535 Lynda Ardern
0741 Cllr Norma Austin Hart
0755 BDW Trading Ltd
1057 George Wood
1059 Kevin Wood
1060 Sheila Wood
1272 Mary Hughes
2006 Liberton & District Community Council
2088 Scottish Government
2126 Cockburn Association
2194 Stephen Bain
2279 Hallam Land Management Ltd
2409 Alistair McLeod
2549 Trustees of the Catchelraw Trust
2635 Marion Stevenson
2660 Kezia Dugdale MSP
2662 Ian Murray MP
2699 Scottish Environment Protection Agency

Provision of the development plan to which the issue relates:	These provisions of the Plan deal with the proposals for new housing allocations (HSG 21 Broomhills and HSG 22 Burdiehouse), school proposal SCH 8 Broomhills and greenspace proposal GS 9 Broomhills, in South East Edinburgh.

Planning authority's summary of the representation(s):

CONTEXT

The Main Issues Report consulted on the housing site options in South East Edinburgh, see question three, page 16:

- HSG 21 Broomhills was consulted on as a reasonable alternative;
- HSG 22 Burdiehouse was presented as one of the preferred options.

Both sites were included in the First Proposed Plan and received representations both objecting to their inclusion and supporting their inclusion as housing proposals. These representations were considered, however no significant changes were made to these housing proposals and they are included in the Second Proposed Plan.

Representations seeking removal of HSG 21 Broomhills

Seek removal of HSG 21 on the grounds of:

- **Site selection** – representations object on the grounds of loss of green belt and green field land, loss of agricultural land, landscape setting, use of brownfield sites first and principle of sustainable development.
- **Transport infrastructure** – concerns regarding traffic congestion and impact on Frogston Road East, A701 Burdiehouse Road and Kaimes Road/Burdiehouse Junction, rat-running on surrounding roads, impact on road safety and emergency services.
- **Impact on school infrastructure** – including the impact of the development on primary school capacity and that high schools would also need to undergo expansion.
- **Impact on community facilities** – including healthcare facilities, as well as police services.
- **Loss of residential amenity** – including visual amenity and air quality
- **Drainage and flood risk, sewage** – including possible risk to homes.
- **Impact on Biodiversity and wildlife**

(0358 Gilmerton Inch Community Council; 2006 Liberton & District Community Council; 2662 Ian Murray MP and 55 individuals listed in Issue 8 - Appendix A)

Representations opposed to HSG 21 Broomhills in current form and seeking its removal and/or change

- Considers that the indicative site capacity has been superseded through detailed design. This reflects a revised net developable area of 17 hectares. Reference to 5 hectare park should be amended to approximately 3 hectares as the design proposals demonstrate. The tree belt should be of varying widths. **(0755 BDW Trading Ltd)**
- The technical assessment process for HSG 19 Broomhills has identified sufficient capacity for up to 650 houses. Considers that it would be appropriate to amend the text. As part of the landscape assessment and masterplan for HSG 21 Broomhills, element of the development principles have been superseded. **(2549 Trustees of the Catchelraw Trust)**
- Agree with concept of greenspace proposal, but lower parts of the site also cannot accommodate development in the south east. **(2126 Cockburn Association)**
- Objects to proposal HSG 21 Broomhills, however if it remains, an additional tree line of 50 metres should be added to the north side of the site. **(1272 Mary Hughes)**
- The combined estimated total capacity at Broomhills and Burdiehouse ranges from 675 - 945 units. Given the potential scale of development and its proximity to the A720, particularly the Straiton Junction, it is considered that the associated trips generated will impact upon the trunk road network at this location. The cumulative impact has not been considered within the Transport Appraisal. As a consequence, the potential impact of development on the A720 has not been fully assessed. **(2088 Scottish Government)**
- Objects to proposal HSG 21 Broomhills, however if it remains then there should be a different access point. Suggests Broomhills Road as access point and gives better viewing and level ground as reasoning. Against a through road within the development for concerns it will become a 'rat-run'. **(0535 Lynda Ardern)**

- The proposal will significantly increase the traffic on Frogston Road and a safe crossing will need to be provided. **(0104 Karen Howe)**
- The proposed site is located within a functional flood plain or an area of known flood risk. Notes that a green corridor is proposed along the edge of the watercourse along the edge of the site, however a flood risk assessment would still be required to assess the actual flood risk from the Burdiehouse Burn. **(2699 Scottish Environment Protection Agency)**

Supports allocation of HSG 21 Broomhills

- Supports allocation of HSG 21 Broomhills. **(2549 Trustees of the Catchelraw Trust)**

Representations seeking removal of HSG 22 Burdiehouse

Seek removal of HSG 22 on the grounds of:

- **Site selection** – Representations object on the grounds of loss of green belt and green field land, loss of agricultural land, landscape setting, use of brownfield sites first and principle of sustainable development.
- **Transport infrastructure** – concerns regarding traffic congestion and impact on Frogston Road East, A701 Burdiehouse Road and Kaimes Road/Burdiehouse Junction, rat-running on surrounding roads, impact on road safety, and emergency services.
- **Impact on School infrastructure** – including the impact of the development on primary school capacity and that high schools would also need to undergo expansion.
- **Impact on community facilities** – including healthcare facilities, as well as police services.
- **Loss of residential amenity** – including visual amenity and air quality.
- **Drainage and flood risk, sewage** – including possible risk to homes.
- **Impact on Biodiversity and wildlife**

(0741 Norma Austin Hart; 0358 Gilmerton Inch Community Council; 2660 Kezia Dugdale MSP; 2662 Ian Murray MP and 38 individuals listed in Issue 8 - Appendix B)

Representations opposed to HSG 22 Burdiehouse in current form and seeking its removal and/or change

- Fully supports allocation of land. Table 4 and development principles should be modified to reflect the permissions which have been granted for parts of the site. **(2279 Hallam Land Management Ltd)**
- Objects to Proposal HSG 22 Burdiehouse. Objects to the bus route on the grounds of safety. Concerned over lack of information about the route, bus gate and traffic calming measures. **(0054 Colin Kemp; 0056 Joyce Kemp; 2194 Stephen Bain; 2409 Alistair McLeod)**
- The combined estimated total capacity at Broomhills and Burdiehouse ranges from 675 - 945 units. Given the potential scale of development and its proximity to the A720, particularly the Straiton Junction, it is considered that the associated trips generated will impact upon the trunk road network at this location. The cumulative impact has not been considered within the Transport Appraisal. As a

consequence, the potential impact of development on the A720 has not been fully assessed. **(2088 Scottish Government)**

- Objects to proposal HSG 22 Burdiehouse, however if remains, agrees with the bus gate system and welcomes new woodland at the eastern edge, but would like additional tree planting in order to distinguish between the proposed estate and the existing 'Murrays'. **(1057 George Wood; 1059 Kevin Wood; 1060 Sheila Wood)**
- The proposed site is located within a functional flood plain or an area of known flood risk. Notes that a green corridor is proposed along the edge of the watercourse along the edge of the site, however a flood risk assessment would still be required to assess the actual flood risk from the Burdiehouse Burn. **(2699 Scottish Environment Protection Agency)**

SCH 8 Broomhills

- As the Revised Education Appraisal June 2014 (corrected September 2014) notes that there are two options being considered for primary education requirements, 'if required' should be added to SCH8. Consideration should be given to a timescale in which the Council can agree land transfer, and if not the site should revert to housing. **(0755 BDW Trading Ltd)**
- Suggests former Burdiehouse primary site for a school due to it being a brownfield site and being ideally located. **(0244 Tony Gray; 2635 Marion Stevenson; 2006 Liberton & District Community Council)**
- The proposed site is located within a functional flood plain or an area of known flood risk. Notes that a green corridor is proposed along the edge of the watercourse along the edge of the site, however a flood risk assessment would still be required to assess the actual flood risk from the Burdiehouse Burn. **(2699 Scottish Environment Protection Agency)**

GS 9 Broomhills

- This name should be changed to reflect design and emerging historic roots. **(0755 BDW Trading Ltd)**

Modifications sought by those submitting representations:

Representations seeking removal of HSG 21 Broomhills,

- Remove proposal HSG 21 Broomhills from the Plan. **(2006 Liberton & District Community Council; 2662 Ian Murray; 0358 Gilmerton Inch Community Council; 0741 Cllr Norma Austin Hart and 5 individuals listed in Issue 8 - Appendix A)**

Representations opposed to HSG 21 Broomhills in current form and seeking its removal and/or change

- Amend capacity from 425-595 to 'up to 650'. Seeks amendments to HSG 21 development principles bullets: 3) reference to 5 hectares should be amended to 'approximately 3 hectares'. 4) delete 50m. **(0755 BDW Trading Ltd)**
- Amend Table 4 to ‘up to 650 houses’. Amend site brief for HSG 21Broomhills to 1) reflect a reduced approximately 3ha public park. 2) a tree belt of varying widths, dictated by the masterplan. **(2549 Trustees of the Catchelraw Trust)**

- Remove proposal from the Plan, otherwise extend greenspace proposal within HSG 21 Broomhills and review number of houses. **(2126 Cockburn Association)**
- Remove proposal from the Plan, otherwise an additional tree line of 50 metres should be added to the north side of the site. **(1272 Mary Hughes)**
- Transport Scotland requests that the following bullet point be added to Broomhills Development Principles on page 60 – 'Contribution towards junction improvements at A720, Straiton Junction'. The Action Programme should be updated accordingly. **(2088 Scottish Government)**
- Remove proposal from the Plan or seeks protection of trees along south side of Frogston Road East, as per those to the north, which are subject to a Tree Preservation Order, a new access point to Frogston Road East and no through road within the proposed development. **(0535 Lynda Ardern)**
- A safe pedestrian crossing is needed at Mortonhall Park Avenue. **(0104 Karen Howe)**
- The Plan should refer to the requirement for a flood risk assessment. **(2699 Scottish Environment Protection Agency)**

Representations seeking removal of HSG 22 Burdiehouse

- Remove proposal HSG 22 Burdiehouse from the Plan. **(0358 Gilmerton Inch Community Council; 2660 Kezia Dugdale; 2662 Ian Murray; and 38 individuals listed in Issue 8 - Appendix B)**

Representations opposed to HSG 22 Burdiehouse in current form and seeking its removal and/or change

- Seeks a series of amendments to HSG 22 development principles. 1) 'Main' access to the site not to be taken Lang Loan. This is to allow access from proposed extension to the site. 2) Amends principle requiring site to 'provide' street verges and trees on Burdiehouse Road and 'create' residential frontage. 3) Changes 'must enable' to 'should seek' and adds additional text 'the Council must facilitate and enable the delivery of the bus link where the land is outwith the Burdiehouse landowners' control (i.e to the east of Burdiehouse and west of The Murrays. 4) Changes 'must be' to 'should be'. 5) Changes 30m wide 'tree belt' to 20m 'structural planting' to allow for an appropriate development area. 6) Changes 50m wide tree belt to 20-30m wide structural planting and restricts this to the south east of the site. 7) Removes reference to off-site provision for multi-user paths. Refers to HSG22 contributing to the multi-user path within its own boundary. 8a) highlights that public access to be limited by land ownership 8b) adds text referring to where feasible. Highlights that it is not appropriate to extend the woodland along the southern bank as suggested. Highlights that this area should be allowed to receive future SUDS proposals. Other changes: woodland to south east and south west to be reduced to 30-50m and 20m treebelt, woodland along burn to be reduced, site boundary to be extended and tree planting along new edge (see issue 14), realignment of proposed path to Straiton Pond. Also proposes development Supports allocation of HSG22 Burdiehouse. Requests amendment to Table 4: Planning permission in principle was granted for housing on the western part of the site in 2012 nominally for around 100 units*. Site HSG 22 includes this and incorporates additional land to the west, north and east. Development must accord with the Broomhills and Burdiehouse Site Brief (pages 58-59). Estimated Total Capacity: 250-350. [*Application for Approval of Matters Specified in

Conditions (AMC) subsequently approved in June 2013 for residential development of 122 houses and flats (including 30 affordable units – 25%) on 4 hectares. 12/04385/AMC] (**2279 Hallam Land Management Ltd)**

- Removal of bus gate and bus route from HSG22. **(0054 Colin Kemp; 0056 Joyce Kemp; 2194 Stephen Bain; 2409 Alistair McLeod)**
- Additional tree planting on eastern edge of site and allow for sufficient road width to accommodate the bus stop. **(1057 George Wood; 1059 Kevin Wood; 1060 Sheila Wood)**
- Requests that the following bullet point be added to Burdiehouse Development Principles on page 60 – 'Contribution towards junction improvements at A720, Straiton Junction'. The Action Programme should be updated accordingly. **(2088 Scottish Government)**
- The Plan should refer to the requirement for a flood risk assessment. **(2699 Scottish Environment Protection Agency)**

SCH 8 Broomhills

- Inclusion of former Burdiehouse primary site within the HSG21 site. **(0244 Tony Gray; 2635 Marion Stevenson; 2006 Liberton & District Community Council)**
- Add 'if required' to proposal SCH8. **(0755 BDW Trading Ltd)**
- Remove proposal from plan **(2635 Marion Stevenson; 2639 David Morgan)**
- The Plan should refer to the requirement for a flood risk assessment. **(2699 Scottish Environment Protection Agency)**

GS 9 Broomhills

- GS 9 should be re-named 'New Bordeaux Park'. **(0755 BDW Trading Ltd)**

Summary of responses (including reasons) by planning authority:

Site selection – HSG 21 Broomhills and HSG 22 Burdiehouse

- The LDP must conform to the relevant provisions of the approved SDP and its Supplementary Guidance. These include a requirement for a generous allocation of housing land in the Council's area and the designation of a green belt around Edinburgh (SDP Policies 5, 7 and 12).

In preparing the LDP, the Council has sought to meet the overall housing land requirement in ways which prioritise use of brownfield sites in existing urban areas and which minimise the loss of land from the Green Belt, in accordance with SDP paragraphs 113 and 130. The Council's response to the representations in Issue 5 explains why it is nevertheless necessary for this LDP to make significant new releases of greenfield land from the green belt at this time, and of the scale set out in the Second Proposed Plan. In selecting greenfield housing sites for release, the Council has sought to minimise the impact on greenbelt objectives and to secure long-term boundaries, in accordance with SDP Policy 12 and paragraph 130. To do so, the Council has assessed relevant greenfield land for its suitability in these terms. The site assessment process has gathered evidence on the relevant land on a systematic and consistent basis and presented its findings in a way which enables comparison and hence selection of those sites which are most appropriate. This approach has been informed by consideration of the findings and recommendations of the Report of Inquiry for the Edinburgh City Local

Plan (pages 1-21 to 1-26).

For the LDP the Council has set out the evidence of its housing site assessment in the project's Environmental Report, which also presents the statutory Strategic Environmental Assessment of the Plan. The method and criteria used in the site selection process are described in Volume 1 of the Environmental Report – Second Revision, pages 26-33. The site assessments are set out in Appendices 5-9 (Volume 2) and, for some sites, the Environmental Report Addendum. At each stage of the LDP project the Environmental Report has been revised and updated as appropriate to:

- show what regard has been had to statutory representations received at the previous stage;
- respond to changes in the SDP context to the LDP, which have required additional housing land to be found.

The criteria used for the housing site assessment are set out in Tables 6 and 7 of the Environmental Report (Volume 1). They are structured using the three objectives for green belts stated in SPP paragraph 49 and SDP Policy 12. They correspond to SDP policies and the content of Scottish Planning Policy as set out in Table 1, page 3 in the Environmental Report Addendum. The assessment findings set out in the appendices of the Environmental Report include the Council's overall conclusions about whether some or all of a site should be allocated in the LDP.

For ease of comparison, the assessment findings are presented in matrix form in Appendix 2 Updated of the Environmental Report Addendum (an updated version of Appendix 2 of the Environmental Report – Second Revision (Volume 1)). This is intended to be a similar format to that used in the Edinburgh City Local Plan Report of Inquiry. The LDP assessment uses a 'traffic light' symbology to indicate whether a site meets a criterion (green), does not meet it (red), or partly meets it / uncertainty (amber).

For sites selected and allocated in the LDP, a separate, statutory assessment of their likely environmental effects is set out in Appendix 3 of Volume 1 of the Environmental Report. In some cases this identifies likely adverse impacts. Section 4 of the Environmental Report sets these out along with proposed mitigation. This site selection process has resulted in the Second Proposed Plan's spatial strategy, summarised on Figure 1 of the Plan. It meets the housing land requirements in full while designating a green belt which best meets the objectives of SPP and SDP Policy 12. The Second Proposed Plan's spatial strategy establishes and maintains strong, clear long-term boundaries to control the outward growth of the city.

The allocation of these sites HSG 21 Broomhills and HSG 22 Burdiehouse in the Plan is therefore appropriate in terms of compliance with Scottish Planning Policy and SDP Policies 1 A & B, 5, 7, 8, 9 and 12.

No modification proposed.

<u>Representations seeking removal of HSG 21 Broomhills</u>

- **Site Selection.** See Council's response on site selection and principle of development on Page 6 above.

- **Transport infrastructure.** As part of the Plan process, the Council has carried out a Transport Appraisal (Volumes 1 and 2, 2013, Addendum, 2014). This appraised the cumulative impact of the new developments proposed in the Plan, taking account of other factors. This identifies improvements to transport infrastructure to deal with the net impact of new housing proposals in South East Edinburgh. These transport actions are set out in the Council's Proposed Action Programme on pages 28-29. For HSG21 Broomhills, the actions include an upgrade to the Burdiehouse Junction (T21), new pedestrian and cycleway access, street improvements to Burdiehouse Road and upgrading bus stops on Burdiehouse Road. The detail of these actions is being established through transport assessments required at the planning application stage. All relevant proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.
- **School infrastructure.** As part of the Plan process, the Council has prepared a Revised Education Appraisal June 2014 (corrected September 2014) which identifies the improvements to school infrastructure to deal with the net impact of new housing proposals in West Edinburgh. These Education actions are set out within the Council's Proposed Action Programme. For HSG21 Broomhills these actions are set out on pages 24-27 of the accompanying proposed Action Programme. They include a contribution requirement towards additional capacity within both the non-denominational and denominational primary and high school estate. This includes two new primary schools at Broomhills (non-denomination) primary school (SCH 8) and New Gilmerton South (non-denomination) primary school (SCH 7) and an extension to either Liberton or Gracemount High School. All proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.
- **Community facilities.** The Plan in paragraph 72 acknowledges that housing proposals will have implications for the provision of primary healthcare and other community health services. Policy Hou 10 Community Facilities seeks to ensure that where practical and reasonable a range of community facilities is provided with new housing development. The Plan identifies where non-residential units should be provided in new housing sites which could provide potential premises for new health practices. Paragraph 130 of the Plan states that developer contributions to measures intended to mitigate the net effects of development, other than actions identified in the Action Programme, may also be required. The Council has discussed all growth allocations with the relevant part of NHS Lothian. This has assessed the need for new and expanded general practitioner practices to accommodate the planned housing growth set out in the Second Proposed Plan. No specific actions have been included in the Action Programme at this time, however when suitable and specific actions are identified these will be included in future iterations of the Action Programme. Where these are needed to address demand arising from new development, financial contributions towards the cost may be sought in line with relevant policies and guidance.
- **Biodiversity**. In preparing a Local Development Plan, the Council must comply with the Scottish Biodiversity Duty. This has been done by carrying out a Strategic Environmental Assessment. One of the objectives of the Strategic Environmental Assessment is to 'Protect and enhance biodiversity, flora and fauna, and habitat networks'. The Strategic Environmental Assessment's findings are available in the Environmental Report. Volume 1 page 34 sets out the method of assessment, which uses the maps in Volume 2 (page 3). The relevant findings regarding Broomhills are set out in Volume 1 page 70.The allocations do not have a significant harmful effect on biodiversity, flora or fauna.

- **Drainage, flood risk, residential amenity**. In preparing the Plan, the Council must consider the impact of development on flood risk. The Plan proposals have been assessed strategically for flood risk using a fluvial flood risk map showing areas at medium-to-high risk (i.e. a 1-in-200 year event) (Figure 3 of the Environmental Report Volume 1, page 21 and Volume 2 page 52). Appropriate licensing of such works would be required. The issue of flood risk for all developments, not just LDP proposals is addressed through Policy Env 21. Sewage, pollution and other environmental issues including the impact on residential amenity is addressed through Policy Env22.

No modification proposed.

(2006 Liberton & District Community Council; 2662 Ian Murray MP; 0358 Gilmerton Inch Community Council; 0741 Cllr Norma Austin Hart and 56 individuals listed in Issue 8 - Appendix A)

Representations opposed to HSG 21 Broomhills in current form and seeking its removal and/or change

- It is appropriate for planning authorities to identify the capacities of housing sites in their Local Development Plans. To do so, it is necessary for them to make assumptions about density. The density assumption at Broomhills comes from multiplying the developable area identified on page 48 of the Environmental Report – Second Revision Volume 2 (17 ha), by the density range on page 28 of Volume 1 (27.5 to 32.5 dwellings per hectare). Any alteration to these should be justified through submission of a comprehensive masterplan at the planning application stage and through development of detailed design solutions. With regard to the size of the park, refer to the response to the Cockburn Association (rep 2126) and Appendix 3: Schedules of Representations June 2014, Issue 8: New Greenfield housing proposals in South East Edinburgh - Broomhills and Burdiehouse, page 201 'No change has been made to the extent of Proposal GS9. Whilst the shape and form of the park may evolve following the preparation of a detailed Master Plan and further analytical studies, the broad area of the park is required to reflect the landscape constraint in the centre of the site.' The Development Principles for Broomhills (HSG 21) set out the broad site specific objectives for proposed allocations, any alteration to these should be justified through submission of a comprehensive masterplan at the planning application stage and through development of detailed design solutions. No modification proposed. **(0755 BDW Trading Ltd)**
- It is appropriate for planning authorities to identify the capacities of housing sites in their Local Development Plans. To do so, it is necessary for them to make assumptions about density. The density assumption at Broomhills comes from multiplying the developable area identified on page 48 of the Environmental Report – Second Revision Volume 2 (17 ha), by the density range on page 28 of Volume 1 (27.5 to 32.5 dwellings per hectare). Any alteration to these should be justified through submission of a comprehensive masterplan at the planning application stage and through development of detailed design solutions. No modification proposed. **(2549 Trustees of the Catchelraw Trust)**
- Previously addressed by clarification provided in Appendix 3: Schedules of Representations June 2014, Issue 8: New Greenfield housing proposals in South East Edinburgh - Broomhills and Burdiehouse, p.201 'No change has been made to the extent of Proposal GS9. Whilst the shape and form of the park may evolve following the preparation of a detailed Master Plan and further analytical studies,

the broad area of the park is required to reflect the landscape constraint in the centre of the site.' No modification proposed.**(2126 Cockburn Association)**

- Whilst woodland planting is required to the south and west of the site to establish a robust green belt boundary, there is no requirement to enclose the northern boundary of site, which would not promote integration with existing townscape to the north. The northern edge of the proposed allocation already includes field boundary trees, which are subject to a Tree Preservation Order and with the exception of limited tree removal to facilitate site access, would be retained in situ. A new street frontage would be formed, extending the existing pattern of development westwards along Frogston Road East. No modification proposed. **(1272 Mary Hughes)**
- It is noted that Plan's should take account of the cross boundary transport implications of all policies and proposals. The study that Transport Scotland is currently progressing with the Strategic Development Plan authorities is intended to address cross boundary impacts of the development proposals. The scope is agreed and Transport Scotland is contributing to the study. The outputs of the study will inform future annual iterations of the Developer Contributions and Affordable Housing Guidance and the Action Programme as appropriate. No modification proposed. **(2088 Scottish Government)**
- Trees on the south side of Frogston Road East are already subject to a Tree Preservation Order, TPO No. 7, which applies to Morton Mains. A development of 425-595 units will require two road access points, from Frogston Road East and Burdiehouse Road. The Development Principles for Broomhills on page 60 state that there should be no direct route between the two points. Accessing the site from Broomhills Road would negatively impact on the greenbelt boundary. No modification proposed. **(0535 Lynda Ardern)**
- For HSG21 Broomhills, the actions include an upgrade to the Burdiehouse Junction (T21), new pedestrian and cycleway access, street improvements to Burdiehouse Road and upgrading bus stops on Burdiehouse Road. The detail of these actions is being established through transport assessments required at the planning application stage. It would not be appropriate to request an additional crossing point at Mortonhall Park Avenue in line with Circular 3/2012. No modification proposed. **(0104 Karen Howe)**
- The issue of flood risk is for all developments, not just LDP proposals and is addressed through Policy Env 2. No modification proposed. **(2699 Scottish Environment Protection Agency)**

<u>Representations seeking removal of HSG 22 Burdiehouse</u>

- **Site Selection.** See the Council's response on site selection and principle of development on page 6 above.
- **Transport infrastructure.** As part of the Plan process, the Council has carried out a Transport Appraisal (Volumes 1 and 2, 2013, Addendum, 2014). This appraised the cumulative impact of the new developments proposed in the Plan, taking account of other factors. This identifies improvements to transport infrastructure to deal with the net impact of new housing proposals in South East Edinburgh. These transport actions are set out in the Council's Proposed Action Programme, on pages 28-29. For HSG 22 Burdiehouse the actions include an upgrade to the Burdiehouse Junction (T21), enhancements to peak period bus capacity; improvements to walking and cycling and access and a bus gate through the site. The detail of these actions is being established through transport assessments required at the planning application stage. All relevant proposals will be required

to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.

- **School infrastructure.** As part of the Plan process, the Council has prepared a Revised Education Appraisal June 2014 (corrected September 2014) which identifies the improvements to school infrastructure to deal with the net impact of new housing proposals in West Edinburgh. These Education actions are set out within the Council's Proposed Action Programme. For HSG 22 Burdiehouse these actions are set out on pages 24-27 of the accompanying proposed Action Programme. They include a contribution requirement towards additional capacity within both the non-denominational and denominational primary and high school estate. This includes two new primary schools at Broomhills (non-denomination) primary school (SCH 8) and New Gilmerton South (non-denomination) primary school (SCH 7) and an extension to either Liberton or Gracemount High School. All proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.
- **Community facilities.** The Plan in paragraph 72 acknowledges that housing proposals will have implications for the provision of primary healthcare and other community health services. Policy Hou 10 Community Facilities seeks to ensure that where practical and reasonable a range of community facilities is provided with new housing development. The Plan identifies where non-residential units should be provided in new housing sites which could provide potential premises for new health practices. Paragraph 130 of the Plan states that developer contributions to measures intended to mitigate the net effects of development, other than actions identified in the Action Programme, may also be required. The Council has discussed all growth allocations with the relevant part of NHS Lothian. This has assessed the need for new and expanded general practitioner practices to accommodate the planned housing growth set out in the Second Proposed Plan. No specific actions have been included in the Action Programme at this time, however when suitable and specific actions are identified these will be included in future iterations of the Action Programme. Where these are needed to address demand arising from new development, financial contributions towards the cost may be sought in line with relevant policies and guidance.
- **Biodiversity**. In preparing a Local Development Plan, the Council must comply with the Scottish Biodiversity Duty. This has been done by carrying out a Strategic Environmental Assessment. One of the objectives of the Strategic Environmental Assessment is to 'Protect and enhance biodiversity, flora and fauna, and habitat networks'. The Strategic Environmental Assessment's findings are available in the Environmental Report. Volume 1 page 34 sets out the method of assessment, which uses the maps in Volume 2 (page 3). The relevant findings regarding Burdiehouse are set out in Volume 1 page 71.The allocations do not have a significant harmful effect on biodiversity, flora or fauna.
- **Drainage, flood risk, residential amenity**. In preparing a Local Development Plan, the Council must consider the impact of development on flood risk. The new Local Development Plan proposals have been assessed strategically for flood risk using a fluvial flood risk map showing areas at medium-to-high risk (i.e. a 1-in-200 year event) (Figure 3 of the Environmental Report Volume 1, page 21 and Volume 2 page 52) Appropriate licensing of such works would be required. The issue of flood risk for all developments, not just LDP proposals is addressed through Policy Env 21. Sewage, subsidence and other environmental issues including the impact on residential amenity is addressed through Policy Env 22.

No modification proposed.

(0741 Cllr Norma Austin Hart; 0358 Gilmerton Inch Community Council; 2660 Kezia Dugdale MSP; 2662 Ian Murray MP; and 38 individuals listed in Issue 8 - Appendix B)

Representations opposed to HSG 22 Burdiehouse in current form and seeking its removal and/or change

- The Development Principles for Burdiehouse (HSG 22) set out the broad site specific objectives for proposed allocations, any alteration to these should be justified through submission of a comprehensive masterplan at the planning application stage and through development of detailed design solutions. The site layout at Burdiehouse (HSG 22) shall provide a bus capable route through the site, with implementation of this measure on land beyond the applicant's control to be progressed via the LDP Action Programme. With regard to supplementary tree planting along the Burdiehouse Burn, this is mainly intended to the northeast of the site, where it would enhance existing habitat along the steeper slopes descending to the Burn and assist in reducing diffuse pollution. Any impact of tree planting of land within the 1:200 flood extent to the northwest of the site should be determined via submission of a planning application to allow these matters to be considered in detail alongside open space layout, retention of views and provision of SUDs. No modification proposed. **(2279 Hallam Land Management Ltd)**
- The Transport Appraisal (Volumes 1 and 2, 2013, Addendum, 2014) and the Action Programme identifies improvements to public transport including a bus service to run through the site linking with The Murrays with a bus gate. This action will help reduce congestion and car use and promote the use of public transport between Lasswade Road and Burdiehouse Road. The existing road within the Murray's is of a sufficient width to accommodate buses (43,143). No modification proposed. **(0054 Colin Kemp; 0056 Joyce Kemp; 2194 Stephen Bain; 2409 Alistair McLeod)**
- Detailed landscape design surrounding bus gate to be determined as part of planning application and subject to land acquisition to form an adopted road. Existing woodland to be retained where possible in accordance with Policy Env 12. No modification proposed. **(1057 George Wood; 1059 Kevin Wood; 1060 Sheila Wood)**
- It is noted that Plans should take account of the cross boundary transport implications of all policies and proposals. The study that Transport Scotland is currently progressing with the SESplan authorities is intended to address cross boundary impacts of the development proposals. The scope is agreed and Transport Scotland is contributing to the study. The outputs of the study will inform future annual iterations of the Developer Contribution and Affordable Housing Guidance and the LDP Action Programme as appropriate. No modification proposed. **(2088 Scottish Government)**
- The issue of flood risk for all developments, not just LDP proposals is addressed through policy Env2. No modification proposed. **(2699 Scottish Environment Protection Agency)**

Representations opposed to SCH 8 Broomhills in current form and seeking its removal and/or change

- The most appropriate location for a new primary school to serve the Broomhills and Burdiehouse sites would be land in the northern part of the Broomhills housing site. This is the largest new site in the area and would offer good access. **(0244**

Tony Gray; 2635 Marion Stevenson; 2006 Liberton & District Community Council)

- As part of the Plan process, the Council has prepared a Revised Education Appraisal June 2014 (corrected September 2014) which identifies the improvements to school infrastructure to deal with the net impact of new housing proposals in South East Edinburgh. These Education actions are set out within the Council's Proposed Action Programme. For HSG21 Broomhills these actions are set out on pages 24-27 of the accompanying proposed Action Programme. They include a contribution requirement towards additional capacity within both the non-denominational and denominational primary and high school estate. This includes two new primary schools at Broomhills (SCH 8) and Gilmerton (SCH7). If it is determined that the options for South East Edinburgh have changes, or that a new school for the Broomhills site is no longer required, this will be done through an update to the Action Programme and an update to accompanying guidance on Developer Contributions and Affordable Housing. No modification proposed. **(0755 BDW Trading Ltd)**
- The issue of flood risk is for all developments, not just LDP proposals and is addressed through policy Env2. No modification proposed. **(2699 Scottish Environment Protection Agency)**

Representations opposed to GS 9 Broomhills in current form and seeking its removal and/or change

- LDP Action Programme refers to the site as 'Broomhills Park'. Whilst not a planning matter, for clarity, it is not proposed to change the name and reference given to this green space proposal in the Plan. The final name of the park may be subject to further discussion, should the proposed park be adopted by the Council. If space remains privately managed but publicly accessible there would be no objection to a suitable alternative name, providing there is no conflict with existing street names. No modification proposed. **(0755 BDW Trading Ltd)**

Reporter's conclusions:

Context

1. Paragraph 119 of Scottish Planning Policy states that local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Allocated housing sites should be effective in meeting the housing supply target. Policy 5 of SESplan sets out the housing land requirement for the SESplan area, and Supplementary Guidance provides the required share of this housing within the City of Edinburgh. I refer to the findings in Issue 5 relating to the sufficiency of the housing land supply in this context.

2. The spatial strategy of both SESplan and the local development plan prioritises the development of housing within 4 strategic development areas, and these proposed sites lie within the South East Edinburgh strategic development area. Whilst it has not been possible to avoid some release of green belt land in meeting the housing land requirement, the council has sought to minimise the impact on green belt objectives. The assessment of the allocated sites is set out in the environmental report, which is the

context for my examination of the representations relating to these sites.

3. In the circumstances, the inclusion of existing green belt land within the housing allocations is necessary in order to meet the housing land requirement over the plan period in full. However, this would not prevent the deletion or modification of particular sites where it is found through this examination that such sites would not be appropriate with respect to their environmental impact or the available infrastructure. Alternative means would then need to be found in order to make up any resulting shortfall.

HSG 21 Broomhills

General

4. This proposed housing site constitutes a significant release of green belt land. The site area is some 30 hectares and the potential capacity for housing development extends to 595 houses. It is therefore to be expected that the development of the site would have significant environmental effects and infrastructure requirements, and this is reflected in the number of representations submitted with respect to the allocation of this site. The majority of the representations seek the removal of the site from the plan, although in the event that the site is allocated for housing development, some seek changes to the size of the site and scale of development, and/or modifications to the development principles on various matters. Many of the representations also apply to Proposal SCH 8 and the proposed park under Proposal GS 9, which would both require deletion if the housing site is deleted from the plan. I examine the proposed housing site under the key subject matters raised within the representations, taking into account both the principle and scale of development, and matters set out in the development principles and site brief.

The spatial strategy and loss of green belt

5. The spatial strategy of SESplan prioritises development within 4 strategic development areas in the regional core (City of Edinburgh), one of these being South East Edinburgh. Figure 3 shows the location of the South East Edinburgh strategic development area. The site at Broomhills lies within this area, and therefore the allocation of the site accords with the spatial strategy of SESplan. However, the acceptability or otherwise of the allocation still depends on my examination of the further issues below. Landscape impact is considered first, followed by other environmental considerations including an assessment of the effect on the existing residential amenity of the area, which essentially relates to the housing areas to the north and east, including the village of Burdiehouse along the site's eastern boundary. I then consider the transport and infrastructure implications arising from this proposed housing allocation.

6. Policy 7 of SESplan states that sites for greenfield housing development proposals, either within or outwith the identified strategic development areas, may be allocated in local development plans in order to maintain a 5 years effective housing land supply, subject to satisfying specific criteria to the effect that development will be in keeping with the character of the settlement and local area, will not undermine green belt objectives, and additional infrastructure required is either committed or to be funded by the developer. I am examining all of these criteria in my consideration of this proposed housing site.

7. Policy 12 of SESplan requires the local development plan to define and maintain a green belt around Edinburgh, in order to maintain the character of the city and prevent

coalescence (unless otherwise justified by the local development plan settlement strategy), direct planned growth to the most appropriate locations and support regeneration, maintain the landscape setting of the city and provide opportunities for access to open space and the countryside.

8. Several representations refer to the use of brownfield sites before greenfield sites, and specific housing sites in the area (constituting the former) for which planning permission has been granted or current applications are being considered by the council. However, the council monitors the housing land supply and the assessment through Issue 5 sets out the up to date position taking into account sites with planning permission and sites which are identified through the local development plan.

9. I find no evidence to suggest that there are significant brownfield sites with housing potential which have not been considered by the council, and indeed significant brownfield/regeneration opportunities are being pursued by the council as a priority within the Edinburgh Waterfront and West Edinburgh. I find that the council's approach reflects the SESplan spatial strategy by directing planned growth to the most appropriate locations. It supports regeneration and minimising the impact on green belt objectives by focusing housing development within the strategic development areas, but not exclusively so. The impact on the landscape, potential coalescence and the character and residential amenity of the area are considered further below.

10. The site constitutes prime agricultural land. Paragraph 80 of Scottish Planning Policy seeks to protect such land but recognises that loss of this land may be justified as a component of the settlement strategy. Most of the agricultural land surrounding Edinburgh is classified as prime agricultural land, and since greenfield land requires to be allocated in order to meet the housing land requirement, I find that there is no basis to delete the site from the local development plan simply because it is prime agricultural land. I note the reference within the representations to the Scottish Government's land use strategy for Scotland (2011) which refers to the value of land for a primary use (including agriculture) being recognised in the decision making process. I find that such is recognised, but in the circumstances this is outweighed by the need to allocate further greenfield land for housing development as referred to above.

11. Furthermore, because the site is in agricultural use, it creates limited opportunities in providing access to open space at the present time. I note that the site is considered within the representations to be of value as informal open space by walkers, joggers, horse riders and cyclists. However such use is generally likely to be along the periphery of the site, and I note the value of Broomhills Road along the western boundary of the site as an access route to the wider countryside. In any event, housing development would not prevent access through the site and to the wider countryside, and even though there would be a significant change to the character of the area (which is considered further below), I therefore find that the proposed housing site would not undermine green belt objectives with respect to access to open space and the wider countryside.

Landscape

12. The housing site assessment in Volume 2 of the environmental report concludes that housing development on this site would not affect the wider landscape setting of the city. This is however subject to the central knoll on the site being kept free from development, because such would have an adverse landscape impact. The central knoll is identified in the diagram within the site brief as new greenspace, which is described in the text as a 5

hectare public park to be provided on the highest part of the site in line with open space Proposal GS 9 to reflect the landscape constraint of elevated terrain and outward views to the Pentland Hills and the city skyline.

13. In the Edinburgh Green Belt Study (Volume 2) of 2008, the site is identified within Area A of the Broomhills Landscape Character Area. It is noted that the Midlothian settlements are relatively close to the southern edge of Edinburgh, that open greenspace characterises views beyond the city bypass, and that the slopes of the Pentland Hills provide an open outlook. It is considered important to retain the openness of south facing slopes as a setting to the city, separation between settlements and a containing edge to the city. It is however recognised that there is some limited capacity for housing on the shallow south-east facing slopes above Burdiehouse village and west of the A70. It is stated that woodland should be planted to accentuate the containment provided by the central knoll.

14. From my site inspection, I find that this is a particularly sensitive site for development in landscape terms. It is undulating farmland which rises gradually to a broad ridge (the central knoll) from the east, but has steeper slopes down to the west of the ridge. It is quite difficult to judge the overall extent of the visibility of the site from the surrounding countryside, including the Pentland Hills. However, the site appears to be generally quite prominent in the landscape, and not entirely related to the central knoll.

15. The site is generally screened from the city by pass to the south, and the urban area to the north and east, which would mitigate the impact of development. I consider the impact on the surrounding built up area further below. Nevertheless, it is clear that the development of the site for housing would constitute a significant and fairly prominent extension to the urban area of South East Edinburgh from much of the surrounding countryside, even with the central part of the site being developed as a public park. I note that the countryside to the west is also assessed as a potential housing site in Volume 2 of the environmental report, with the conclusion that this would have an adverse impact upon the city's wider landscape setting and identity (referring to the important visual relationship with Pentland Hills, where the fields form part of a green wedge extending into the city).

16. The site at Broomhills is closer and relates better to the existing urban area than the countryside to the west, but it is nevertheless part of the same green wedge extending into the city, which does not stop at Broomhills Road. In this context, a smaller site to the west of Broomhills Road is considered for allocation through Issue 14, but where it is concluded that development would be contrary to green belt objectives in that it would not maintain the identity and character of the city, nor would it establish an appropriate green belt boundary. This site is therefore not recommended for inclusion in the plan.

17. I also refer to the findings within Issue 2, which refer to the special landscape area to the west of Broomhills Road, and draw a distinction between the qualities of the special landscape area and the area within which HSG 21 is located. I therefore find that the allocation of HSG 21 would not set a precedent for further housing development to the west Broomhills Road because of this distinction, and also because Broomhills Road constitutes an appropriate and defensible green belt boundary.

18. Notwithstanding the above, I find that the assessment in the environmental report does not give sufficient weight to the landscape impact of development on the site. I find that there would be an adverse impact on the landscape setting of the city from the

development of this site for housing, given the general openness and prominence of the site within the wider countryside. However, I recognise that tree planting and retention of open space, as proposed in the development principles, would mitigate this to some extent, and this is considered further below. In addition, and despite the adverse landscape impact, I find that the development of the site for housing would not significantly undermine green belt objectives, because the landscape framework for the southern edge of the city would be sufficiently maintained through the retention of the special landscape area to the west.

Coalescence

19. Concern is expressed with respect to potential coalescence between the south side of Edinburgh and Straiton, to the south of the A720. It is considered that most of the proposed new housing within Midlothian extends from the south to the city bypass along the A701 corridor, and that therefore the only remaining area between the bypass and the existing built up area of the city would be lost to development.

20. However following my site inspection, from the site of HSG 21, and even from the elevated broad ridge in the centre of the site, there is no significant view to the areas within Midlothian to the south of the A720. There are significant views to the Pentland Hills, but this matter has already been addressed in the context of landscape impact. I therefore find that there would be no significant perception of coalescence from the site. I acknowledge that there may be an impression of development on both sides of the bypass when travelling along it, but I do not consider this to be a substantial matter which in the circumstances would undermine green belt objectives.

Biodiversity

21. The site is likely to provide a natural habitat for local wildlife species, particularly along its boundaries. Several representations refer to the variety of wildlife found on or in the vicinity of the site, including European protected species. Volume 1 of the environmental report sets out the assessment of the biodiversity value of the site. There is reference to a local biodiversity site running along the southern edge of the site, but I am satisfied that development on the site could avoid any adverse impact on this area. The site itself is not designated as being of particular value for local nature conservation. With respect to any European protected species subsequently found to have an interest the site, I am satisfied that such interest would be satisfactorily protected by the Conservation (Natural Habitats, &c.) Regulations 1994. In any event, the site is not likely to be more sensitive than other farmland within the green belt which is being considered for release to meet the housing land requirement. I therefore find that there is no biodiversity interest in the site of such significance that would warrant the removal of the housing allocation from the local development plan.

Character of the area and residential amenity

22. Housing within the village of Burdiehouse to the east is generally well separated from the eastern boundary of the site. There is a small row of cottages along the west side of Old Burdiehouse Road, but there is a boundary wall that provides reasonable screening from the site. Subject to an appropriate layout and provision for open space within the development, I find that there would not be any significant adverse impact on the residential amenity of the village.

23. There is existing housing along the eastern boundary of the site with Burdiehouse Road to the north west, and along the northern boundary of the site with Frogston Road East. This is the point at which the main urban edge of the city adjoins the site. Whilst there is some vegetation already along these boundaries (including some mature trees), many of these houses directly overlook the site. Some form of landscaped buffer may be required in order to avoid overlooking and maintain an appropriate level of residential amenity. However, I consider that this could be satisfactorily addressed through the development management process. There would be views of new housing on the site, but not to an extent that these would constitute an adverse impact on residential amenity.

24. In more general terms, there is concern within the representations about the effect of new housing development on the character of the area. However, subject to an appropriate housing layout, design and open space (including the proposed park), I find that there would be no significant adverse impact on the character of the existing urban area beyond the effect on the landscape setting as referred to above. I am satisfied that green belt objectives would not be undermined in this context.

25. Despite a representation on this matter, there is no basis to restrict housing on the site to a particular height, because this would depend on the overall layout and landscaping of the site, which is a matter for the development management process. With respect to comments that housing development would not accord with Policy DES 9, this policy would not apply if the site is removed from the green belt and allocated for housing. In any event, I am satisfied that the principles of the policy are taken onto account with respect to the environmental assessment of proposed housing sites in Volume 2 of the environmental report.

Transport

26. There is significant concern expressed within the representations about the effect of the proposed housing development on the local road network. The cumulative impact of housing development on this site, together with housing development on site HSG 22 Burdiehouse (considered further below), has been considered in the transport appraisal, where in Volume 1 an increase in traffic flow of some 13% above base line and committed development is predicted for the A701 corridor. This is a key arterial route into the city centre from the city bypass, and the increase in traffic flow resulting from new housing development would therefore be significant. It is stated within representations that there is already congestion on this route, together with the B701 running from east to west parallel to the city bypass. It is claimed that this road becomes busy as an alternative route to the city bypass, and this is to some extent supported within the transport appraisal, where it is stated within section 8.5 that orbital traffic is assigned to both an outer orbital (the A720) and an inner orbital, which would include the B701.

27. Following on from the above, improvements to the Burdiehouse junction (also referred to elsewhere as the Kaimes junction) have been identified in Proposal T21, in order to address the net impact of the proposed housing development. Proposal T21 is based on the improved efficiency of traffic signals to ease congestion and maintain or improve bus priority for north to south traffic. This is also set out in the action programme together with other transport interventions relating to this particular site, and is intended to be implemented when the housing development is implemented. The improvements would be the subject of developer contributions as appropriate. However, there is no clear indication about the actual effect of this improvement in mitigating congestion.

28. There is expected to be a >5% increase in traffic levels on the A720 city by pass. This is likely to have implications for junctions on the A720. It is noted in the transport appraisal that the >5% increase on the A720 would occur along its whole length, with individual sites having an impact on different parts of the road. It is nevertheless in overall terms a significant increase given existing congestion that already occurs at peak periods along the route. I therefore have some concern about the effect on existing junctions in the vicinity of the site. There may be some impact on the Sheriffhall junction on the A720. There is already a proposal to improve this junction (Proposal T14 involving grade separation) which may largely be based on other considerations, but it is referred to in Volume 1 of the transport appraisal as having an impact on sites in East Edinburgh. The impact of the traffic generation from proposed housing site HSG 21 on the Sheriffhall junction may be relatively minor, but it is unknown at this stage.

29. I have more concern however about the impact of development on the Straiton junction of Burdiehouse Road with the A720. The transport appraisal in Volume 2 refers to a possible improvement scheme for this junction, but states that since there is no approved scheme, this is not considered necessary. However, Transport Scotland considers that there would be a cumulative impact from this site and HSG 22 on the junction, requiring improvements to be made, which should be the subject of developer contributions from relevant housing sites. Transport Scotland considers that the cumulative impact of development sites on the A720 has not been sufficiently assessed, and this is further examined within Issue 19.

30. In addition, there are potential cross boundary issues in the context of a strategic transport study currently being led by Transport Scotland. This is also examined in Issue 19, and I refer to the findings on this matter there. Several representations refer in particular to extensive proposed housing development in Midlothian, within the A701 corridor. The transport appraisal does not take into account the effect of this, but such is likely to particularly affect the traffic levels on the A701, A720 and at the Straiton junction. I find that improvements to the Straiton junction would need to be specifically referred to within the development principles in the context of the outcome of the strategic transport study currently in progress, and this is examined further under the development principles and site brief below.

31. In overall terms, I find that there are significant uncertainties with respect to the transport interventions that may be required to the trunk and local road network, in order to mitigate the effect of increased traffic generated from housing development on the site. On balance, however, in the context of the findings in Issue 19, I find that these uncertainties would not justify the exclusion of this site from the local development plan, when considered in the context of the revised policy framework recommended through Issues 19 and 21. A new transport policy would require proposals to address cumulative and cross boundary impacts and Policy Del 1 and its supporting Supplementary Guidance would address the delivery of any required infrastructure. These matters and the required mitigation are further examined in the context of the development principles below.

32. Concern is also expressed in the representations about there being inadequate public transport to support the proposed housing development. Public transport provision is a priority in terms of seeking to reduce travel by private car, and mitigate the effects of proposed housing development on the trunk and local road network. The assessment in Volume 2 of the environmental report indicates fairly good access to public transport near Frogston Road East and Burdiehouse Road, but less so from the south west part of the

site which is more distant from the bus services along Frogston Road East and Burdiehouse Road.

33. The transport appraisal refers to a number of improvements relating to bus stops, active travel links from the site to bus stops, and capacity (or frequency) of bus services. These are set out in the development principles. In general terms, I find that public transport services and their proposed improvement maximise the potential for sustainable means of transport as an alternative to the private car. However, the effect of this on reducing congestion on the trunk and local road network remains uncertain.

34. It is also necessary to consider the effect of traffic on road and pedestrian safety, and this is further considered with respect to the development principles below. In particular, there is a need for appropriate speed limits and traffic management which promotes road safety. However, there is no evidence to suggest that (subject to appropriate traffic measures including vehicular access to the site and reducing congestion) the increase in traffic levels would have a significant adverse effect on road or pedestrian safety. The proposed school is located within the proposed housing site, and the development management process would ensure appropriate traffic management in order to promote pedestrian safety including a safe route to the school for children.

35. There is also concern expressed within the representations about the effect of greenhouse gases from exhaust emissions (from all vehicles) on climate change and about noise and pollution from increased traffic levels. However, I find that there would not be a significant difference wherever the housing land is allocated, given the need to meet the housing land requirement. Nevertheless, this is another factor which justifies the need to ensure that congestion is reduced to a minimum, which in turn reduces the direct effect of slow moving traffic on noise and pollution at junctions.

Education infrastructure

36. The revised education appraisal identifies improvements to the school infrastructure which are required to meet the education needs arising from the proposed allocation of HSG 21 together with HSG 22 east of Burdiehouse Road. There are 2 options being considered for non-denominational primary school provision, the first of these being to provide a new primary school within the site of HSG 21, and the second being to extend the existing primary school provision at Gracemount and Gilmerton Primary Schools. Additional secondary school capacity would be needed either at Liberton High School or Gracemount High School or a combination of both. The requirement for denominational school provision is also assessed in the revised education appraisal.

37. The council accepts that proposed housing will add to significant rising rolls and the need for additional school space. It considers that a lead in period of 3 years would allow for the planned provision of the required school infrastructure. The council accepts a potentially significant funding gap between the required works and the anticipated level of developer contributions. However, it states that recognised financial constraints can be addressed through forward and gap funding.

38. There is no technical or expert evidence to dispute the confidence of the council, as education authority, that identified education impacts can be appropriately addressed. Consequently, I find no basis to conclude that these matters justify deletion of the site. However, this does not negate the emphasis that should be placed on the appropriate and planned provision of this necessary infrastructure. In this context, the proposed plan

lacks detail on how this constraint is to be addressed. Given that the proposed mitigation applies to various sites in South East Edinburgh, the reporters consider that the education actions for South East Edinburgh should be brought together in Part 1 Section 5 of the plan. However, it is also important that these actions and the council's approach to timeous delivery are further clarified. This would require Supplementary Guidance to provide greater surety about the mechanisms, timing and funding of delivery. These matters are further addressed through Issue 21.

39. The action programme identifies a new primary school for Broomhills (SCH 8), and improvements to local secondary schools, for which contributions would be required. However, there is an issue relating to the options for primary school provision, which is further considered under the development principles below, where I also examine further the need for reference to the delivery of education infrastructure in terms of the above paragraphs. The potential use of the site of the former Burdiehouse Primary School which has been demolished is outwith the remit of this examination.

Other infrastructure

40. Concern is expressed within the representations that housing development on the site would have an unacceptable impact on community facilities, including health and police services. There is a particular concern that the Gracemount Medical Practice is already at capacity. I have noted the council's response to the effect that actions in addition to those set out in the action programme may be required, and appropriate contributions sought. However, I have no evidence that the net effect on local community facilities would be to such an extent that this would justify the removal of the proposed housing site from the local development plan. In any event, appropriate provision for such facilities could be made through the development management process. This would be in the context of Policy Hou 10 of the local development plan, where any developer contributions would be considered in the context of Circular 3/2012.

41. Concern is also expressed within the representations with respect to increasing the risk of flooding to properties in Frogston Road East and Burdiehouse Road, and potential resulting subsidence. I note that the Scottish Environment Protection Agency has referred to the avoidance of flooding within the southern part of the site adjacent to the burn, and has stated that a flood risk assessment is required. These matters are further considered under the development principles below. However, subject to adequate coverage of these requirements in the development principles, I am satisfied that flood risk can be appropriately managed in order to allow the development of the site for housing.

42. I therefore find in overall terms that appropriate infrastructure is either already available, or can be provided, to an extent which renders the allocation of the site appropriate in terms of infrastructure provision. However, I also consider further below the extent to which any additional provision for infrastructure should be set out in the development principles and site brief.

Development principles and site brief

43. Firstly, I note that the council proposes to grant full planning permission for housing development on site HSG 21 subject to a legal agreement. Whilst I accept that this is a material consideration, I still have to consider the matters that would be appropriate for inclusion within the development principles, based upon the remaining evidence before

me. I therefore consider that the development principles and the site brief should be updated to reflect my conclusions relating to the evidence before me, whilst reconciling them where appropriate with the terms of the proposed grant of planning permission.

44. Following on from Transport Scotland's concerns about the cumulative impact of large scale housing allocations on the trunk road network, which is also examined within Issue 19, I find that provision requires to made for further transport assessments, which should include modelling of the cumulative effect of increased traffic flows on the trunk and local road network (taking into account all known proposed development and any potential cross-boundary impacts). This should draw on the conclusions of the council's transport appraisal and further work being carried out to assess the wider cumulative and cross boundary impacts on the trunk road network.

45. The transport assessments should particularly relate to possible improvements to the Straiton junction on the A720, and should identify any appropriate commensurate mitigation as a result of these transport assessments. In addition, provision should be made for the improvement of the Burdiehouse (or Kaimes) junction which is included through Proposal T21. I note that the improvement of the Burdiehouse junction is already included within the proposed section 75 agreement with respect to the grant of full planning permission. The required provision is recommended within general development principles under Issue 21, where it is also related to the new Supplementary Guidance proposed through Policy Del 1. A reference to developer contributions towards both junction improvements is included. A requirement to address these general development principles is also recommended within the site specific development principles for the site.

46. The bullet point relating to vehicular access should be retained as existing. I note that the principle of no vehicular route through the site has been maintained within the proposed grant of planning permission, and that vehicular access is proposed from both Frogston Road East and Burdiehouse Road. Although I acknowledge that indicative access points are provided on the diagram for other proposed housing sites, I do not consider that this is essential; particularly with the proposed grant of planning permission. With respect to the access from Frogston Road East being moved further west, and being associated with Broomhills Road, I find that there is no basis to require this.

47. It appears to me from my site inspection that access from Frogston Road East to the west of the existing housing on the south side of the road could be provided without causing any significant adverse impact on residential amenity. Broomhills Road is a fairly narrow access road and local path and vehicular access from there should be avoided. In any event the junction between Broomhills Road and Frogston Road East would not in my view be suitable for vehicular access to the site.

48. There is a request within the representations that, in the event that the site is retained in the local development plan for housing, provision should be made for a safe crossing for pedestrians at Mortonhall Park Avenue, for both residents and caravan park tourists. This is not a specific matter identified through the transport appraisal, but it is nevertheless a matter that should be considered with respect to the increased traffic flows through the development management process. However, I find that it is not sufficiently significant to justify its inclusion in the development principles. I have however noted that the upgrading of bus stops is included within the action programme, and I find that this should be incorporated into the development principles for the site.

49. Two of the key points of contention within the site brief are the extent of the tree belts along the boundary of the site, and the extent of the public park, which is also the subject of Proposal GS 9. Commencing with the tree belts, I note the representation on behalf of the prospective developer that the reference to 50 metre tree belts should be deleted. I also note that the council proposes to grant planning permission for a layout which does not provide 50 metre tree belts. I find that tree belts are particularly important along the boundaries of this sensitive site, and I understand that these need to be fairly substantial in order to provide a defensible boundary to the green belt, and to mitigate the adverse impact on the landscape referred to above.

50. However, I note that for other sites where tree belts are proposed in order to create a defensible boundary, flexibility is afforded with respect to the width of the tree belt. Clearly, the council has considered this matter in some detail with respect to this site through the development management process. I therefore find that the reference to 50 metres should be deleted, with the width of the tree belts being related to the layout of housing and open space on the site, although the indicative representation of the tree belts on the diagram should remain as currently illustrated.

51. Concern is expressed in the representations with respect to the trees along the northern boundary of the site with Frogston Road East, and the need for the tree belt to be extended along this boundary. I agree that there should be some form of landscaped buffer between the existing and new housing in this context, but in my view this can be addressed through the development management process. The purpose of such a buffer would be to protect residential amenity, and not to create a defensible green belt boundary. Indeed, it is important that new development is properly integrated into the existing built up area, and so there is no requirement for an indicative tree belt to be included on the diagram along the northern boundary of the site.

52. I have more concern with respect to the proposed public park, which is also the subject of Proposal GS 9. Within Proposal GS 9, there is no reference to the scale of the proposed park, and essentially this is left to the development principles for the site. There is a representation from the prospective developer that this should be reduced in size from 5 hectares to 3 hectares, which is still considered to fulfil the need for open space and mitigation of the landscape impact. The council has clearly also given further thought to this, and the size of the public park appears to have been reduced in the proposed grant of planning permission. On the other hand, there are representations to the effect that consideration should be given to extending the green space and reducing the number of houses on the site.

53. The overall capacity for housing on the site is further considered below, but I am generally in favour of an extensive greenspace within the higher part of the site (comprising the broad ridge in the centre). I recognise that it is important to maximise the efficiency of housing sites in meeting the housing land requirement, but I have already found in this case that there would be an adverse impact on the landscape setting of the city. This takes into account the results of the green belt study undertaken for the strategic development plan, where it is identified that there is limited capacity in landscape terms for development on this site. The size of the public park is therefore relevant in determining the acceptability (or otherwise) of this adverse landscape impact and this is further reflected in my overall conclusion below.

54. However, taking into account the fact that the council has now given due consideration to a detailed development scheme for the site, and proposes to grant full

planning permission including for what appears to be a smaller park than that required by the development principles set out in the proposed plan, I find that the most appropriate course of action would be to remove the reference to the scale of the park from the development principles. I remain of the view that the park should be substantial and therefore consider that this terminology should be used. I also find that the indicative representation of the park on the diagram should remain as it is. The requested change to the name of the park is not in the circumstances a matter that is of sufficient importance in the context of Circular 6/2013.

55. I note that whilst the school (Proposal SCH 8) is shown on the diagram, there is no reference to this within the text of the development principles. However, I note from the revised education appraisal and action programme that the proposed new school remains an option for consideration. I therefore find that within the text of Proposal SCH 8 in Table 5, an additional sentence should be added explaining that this is a preferred option.

56. Further consideration is given through Issue 21 to the requirement for Supplementary Guidance relating to the delivery of education infrastructure. In this context, further detail is considered to be necessary within the development principles, in order to give confidence to the local community and others that the schools capacity issue will be addressed and that the proposed plan is not promoting development in South East Edinburgh that will place an unacceptable strain on existing schools. General development principles are therefore recommended on this matter through Issue 21, and my recommendations include a cross reference to these in the site specific development principles relating to these sites.

57. The Scottish Environment Protection Agency has indicated that a flood risk assessment is required in order to inform the scale, layout and form of development on the site. There is also a reference to required mitigation in the form of avoiding development in the area at risk of flooding in the south of the site, adjacent to the burn. I therefore find that both the requirement for a flood risk assessment and the reference to mitigation as above should be included as an additional bullet point within the development principles. However, it is not necessary to include any reference to this in Table 4 because the stated capacity range is indicative only. With respect to the proposed school, reference to this in the development principles will suffice. I note that a flood risk assessment appears to have been undertaken already in relation to the application for full planning permission which the council now proposes to grant.

58. With respect to the timing of new road improvements, public transport, education and other infrastructure, I find that there should be a statement within the development principles to the effect that development should only progress subject to sufficient infrastructure already being available or where it is demonstrated that it can be delivered at the appropriate time. Such a statement is recommended in the proposed general development principles and Policy Del 1 under Issue 21.

Size of the site and scale of the proposed development

59. There are representations seeking a reduction of the scale of development on the site, but there is also a representation from the prospective developer to the effect that the capacity for development on the site could be extended to 650 houses. In this context, I note that planning permission is proposed for 633 houses. In any event, Table 4 includes an indicative capacity with a range based upon the council's standard approach to density on housing sites, and the number of houses with planning permission

would be well within any tolerance that could be expected to apply to the indicative capacity. I am satisfied that the indicative capacity of the site stated in Table 4 is appropriate based upon the council's general approach to the density of the housing sites allocated in the proposed local development plan. This takes into account the park in Proposal GS 9. I therefore find that the stated capacity in Table 4 should remain.

Overall conclusion

60. I conclude in overall terms that the development of this site for housing would make a significant contribution to the housing land requirement. Whilst there would be an adverse impact on the landscape setting of the city from development on the site, I do not consider that this would in the circumstances significantly undermine the objectives of the green belt, and development would otherwise be acceptable in environmental terms. I am satisfied that sufficient infrastructure is capable of being provided within the policy context as set out elsewhere in this report through Issues 19 and 21. Whilst the council now proposes to grant full planning permission, this has not significantly affected my overall conclusion relating to the site.

61. The above conclusions are however subject to the modification of the development principles and site brief in the terms set out in the recommendations below, including the general development principles recommended through Issue 21. I conclude in overall terms that (subject to such modifications) HSG 21 (Broomhills) should remain designated in the plan for hosing development as shown on the proposals map.

HSG 22 Burdiehouse

General

62. Planning permission has been granted for 122 houses and flats within the western part of this site. Development has commenced in this area, and a number of houses have already been completed. The remainder of the site between the housing site under construction and housing at the Murrays to the east appears to be unused and vacant, overgrown land. However, the number of houses proposed for this area is slightly larger, constituting another 128 - 228 houses within the overall housing site allocation. It is in the circumstances unnecessary to examine the principle of that part of the site which has planning permission, and upon which development has now commenced. It would only be appropriate to amend the provisions relating to the site brief if this would be consistent with the planning permission that has been granted.

Programming the housing land requirement

63. Concern is expressed within the representations that all of the housing to meet the need identified over the next 10 years is allocated in the proposed plan. It is submitted that this should not all be allocated now, but rather on a phased basis, with some of the housing being left to the next review of the local development plan, in order to more properly balance the need to provide housing land with the protection and maintenance of the green belt. I recognise that this would be likely to provide more focus on brownfield sites and regeneration in areas like the Edinburgh Waterfront. However, this may also result in insufficient housing being built over the plan period, owing to the difficulties of timeously developing difficult brownfield sites, and the need to plan well ahead in order to provide a balanced housing land supply; essentially an appropriate mix of housing to meet the needs of the community. Furthermore, a masterplan approach to brownfield

sites and regeneration is being pursued in order to provide appropriate infrastructure for new housing development on such sites.

64. In any event, paragraph 119 of Scottish Planning Policy states that local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. It would therefore not be consistent with Scottish Planning Policy to phase the housing land requirement over the next 10 years in 2 consecutive local development plans. It is necessary for this proposed plan to allocate housing land for the full 10 year period.

The spatial strategy and loss of green belt

65. I find that the matters relating to SESplan, minimising the loss of green belt, prime agricultural land and access to the countryside generally apply as they apply to the Broomhills site examined above. The issue in this case is whether it would be appropriate to approximately double the extent of the site which has planning permission for housing development, infilling the area of the site between this area and the Murrays to the east. The site is existing green belt, but this now constitutes an infill site between the housing development under construction and the Murrays to the east.

66. Whilst the same issues relating to prime agricultural land apply as they apply to the Broomhills site examined above, the site does not appear to be in productive agricultural use. However, as with the Broomhills site, Policy 12 of SESplan still applies, and I need to take into account the site assessment undertaken in Volume 2 of the environmental report. In this context, I again commence with landscape impact followed by other environmental considerations, and then consider the transport and other infrastructure implications arising from the proposed housing allocation.

Landscape

67. The site already has a good landscape framework. Development would be visible from Lang Loan to the south of the site, but from there development would be seen to integrate with (and extend) the existing residential development at the Murrays to the east. The site is fairly close to the A720, but the Straiton junction is not visible from the actual site itself. I find that there would be no significant adverse impact on the landscape setting of the city from housing development on the site, taking into account that part of the site which already has planning permission.

68. Concern is expressed in the representations that the allocation of this site for housing development would set a precedent for the development of land to the south, between the site and Lang Loan. Land between HSG 22 and Lang Loan is considered through Issue 14, but is not recommended for inclusion as a housing site at this time. However, for the reasons set out in Issue 14, changes are recommended to the green belt boundary to the effect that land between HSG 22 and Lang Loan would be included in the settlement boundary. This reflects, amongst other things, the intention to grant planning permission on the adjacent site which in effect already extends the green belt south of the Murrays out to Lang Loan. Any future proposals for housing south of HSG 22 would be considered on their merits through Policy Hou 1 and other relevant plan policies or through a future review of the local development plan.

69. Concern is also expressed about the effect of new housing development on the residential amenity of existing housing at the Murrays, particularly with respect to the loss of existing vegetation (woodland) and considering the respective site levels. From my site inspection, I find that there is existing vegetation on the site that may be worthy of retention, and that this could be supplemented by further tree planting and open space provision. I also consider that there would be no general adverse effect on residential amenity, subject to adequate consideration being given to design, layout and landscaping through the development management process. This is further considered with respect to the development principles examined below. My findings above (relating to Broomhills) with respect to the comments that housing development would not accord with Policy DES 9 also apply to the development of this site.

Biodiversity

70. The site is likely to provide a natural habitat for local wildlife species. This is particularly the case since there has been a significant amount of natural regeneration (and planted woodland) on and in the vicinity of the site. Concern is expressed in the representations particularly in relation to the woodland to the west of the existing housing at the Murrays. This has potential biodiversity value, but I find that there is no reason why this could not be retained with the development of the site, and this is also further considered with respect to the development principles below.

71. Volume 1 of the environmental report sets out an assessment of the biodiversity value of the site. This states that the local nature reserve and biodiversity site to the north could be affected, but that development away from the burn and the reserve should protect biodiversity. In any event, the site is not designated as being of particular value for local nature conservation, and is not likely to be any more sensitive than other farmland within the green belt which is being considered for release to meet the housing land requirement. In the event that any European protected species are subsequently found to have an interest in the site, I am satisfied that the interests of such wildlife would be satisfactorily protected by the Conservation (Natural Habitats, &c.) Regulations 1994. I therefore find that there is no biodiversity interest in the site of such significance that would warrant the removal of the housing allocation from the local development plan.

Transport

72. There are specific transport interventions relating to the site as set out in the development principles and the action programme. Of particular interest is the proposed bus route through the site, and bus gate at the Murrays. This is required in order to increase the access to sustainable transport within the site, which would otherwise be somewhat remote. However, significant concern is raised within the representations about the effect of this proposed bus route on road safety (particularly for children) within the Murrays and the residential amenity of the existing housing within that area. From my site inspection, I recognise that the Murrays is currently a fairly quiet residential estate. The character of the area would change considerably with a bus route extending from Lasswade Road to Burdiehouse Road. There would undoubtedly be some adverse impact on residential amenity from noise and general disturbance.

73. However, I find that the resulting impact on residential amenity would not be significantly different from any other residential area through which there exists a bus route. The adverse effect on residential amenity would not therefore be overbearing, and I find that such adverse impact as does occur would be outweighed by the improvement

in access to sustainable forms of transport and the promotion of active travel. I am satisfied that the width of the access roads is sufficient in order to accommodate buses, and that appropriate management of the bus route would secure pedestrian safety. There is no reason in my view why existing traffic calming measures would have to be removed from the bus route. The prevention of abuse of the bus route by other vehicles would be matter of enforcing the regulations under which the bus route is provided. I therefore find that there is no justification for the removal of the site from the local development plan, or the removal of the bus route from the proposed housing site.

74. Otherwise, I find that the significant uncertainties with respect to the transport interventions that may be required to the trunk and local road network, applying to the Broomhills site as described above, also apply to this site. The concern of Transport Scotland on cumulative impact, and specifically in relation to the Straiton junction, also applies to this site. Both this matter and the proposed bus route through the site are further examined under the development principles and site brief below. My findings above for Broomhills relating to climate change and pollution apply to this site as well.

Other Infrastructure

75. Similar provisions relating to education and community facilities apply to this site as they apply to Broomhills. The general development principles for education also apply to this site, and the risk of flooding on the site is further addressed under the development principles and site brief below.

Development principles and site brief

76. The most significant matter raised in the representations is the proposed bus route through the site. The third bullet point states that the site layout must enable a bus route to be formed providing a link from the Murrays to Burdiehouse Road, regulated by a bus gate. I refer to my findings above on this matter, and following on from this I also find that it is essential that this provision is retained within the development principles.

77. There are representations seeking additional tree planting along the eastern boundary of the site adjacent to the existing housing. Whilst some form of landscaped buffer would be appropriate along this boundary, I find that this does not require to be referred to within the development principles, but is rather a matter for the development management process, where appropriate landscaping could be considered in order to ensure the protection of the amenity of existing housing. The retention of existing woodland adjacent to the Murrays is also referred to, but this appears to be outwith the site so is also not a matter which requires to be referred to in the development principles.

78. There is a request on behalf of the prospective developer that the existing planning permission should be referred to in the local development plan. I find that this would be consistent with similar references relating to other sites, but that an appropriate addition should be made to Table 4 to refer to this, rather than an addition to the development principles. The prospective developer has also suggested a number of changes to the development principles, and I consider these proposed changes below.

79. With respect to vehicular access I find that there is no reason to require no access from Lang Loan. In this context I refer to the findings in Issue 14, and even though the land between the site and Lang Loan is not being recommended for inclusion as a housing site in the proposed plan, there is no reason to specifically rule out possible

future vehicular access from Lang Loan. This is a matter for future consideration. The proposed change to the bullet point relating to the character of Burdiehouse Road is of no significance. I am generally satisfied with the provisions relating to the bus route and active frontage onto Burdiehouse Road, but I agree that the use of the term "should" is more appropriate than "must", and is more consistent with the terminology that is generally used. There is however no requirement to specify the council's role in facilitating delivery of the route. I have noted that the upgrading of bus stops is included within the action programme, and I find that this should be incorporated into the second bullet point.

80. New woodland or planting should still be required along the southern boundary of the site, but following the conclusions and recommendations in Issue 14, I find that the reference to forming a green belt boundary should be removed from the sixth bullet point. Furthermore, I consider that there is no requirement for any measurement of planting along either the south west or the south east boundary, and that this should be subsequently determined through the development management process. However, the reference to the connectivity of woodland habitat and a multi-user path in the sixth bullet point should be retained, as should the seventh bullet point relating to off-site provision of a multi-user path connection to link with the paths network in Midlothian. This would assist in providing for active travel, and I consider that such provision is appropriate. Otherwise, I find that the suggested additional text within the representation constitutes a level of detail that is unnecessary within the development principles. Additional text for the local open space proposals is also unnecessary, as extending woodland would by definition only apply if it was feasible and appropriate. The notation showing the woodland on the diagram should be retained. I set out the necessary amendments to the development principles in the recommendations below.

81. Following on from Transport Scotland's concerns about the cumulative impact of large scale housing allocations on the trunk road network, the bullet point referred to in my examination of the Broomhills site above, which is recommended through Issue 21, is also required for this site. The bullet point is set out in the general development principles for South East Edinburgh (including Broomhills and Burdiehouse).

82. In addition, the Scottish Environment Protection Agency has indicated that a flood risk assessment is required in order to inform the scale, layout and form of development on the site. I therefore find that the requirement for a flood risk assessment should be included as an additional bullet point within the development principles. I also find that there should be a statement relating to the delivery of infrastructure in the same form as that which is required in relation to the Broomhills site examined above.

Overall conclusion

83. I conclude in overall terms that the development of this site for housing would make a significant contribution to the housing land requirement. Planning permission has now been granted for 122 houses and flats within the western part of this site. The remainder of the site appears to be unused and vacant, overgrown land which constitutes an infill site, and there are no adverse environmental effects resulting from the loss of this site from the green belt. I am satisfied that sufficient infrastructure is capable of being provided within the policy context as set out elsewhere in this report through Issues 19 and 21. Subject to the modification of the development principles and site brief in the terms set out in the recommendations below, including the general development principles recommended through Issue 21, I conclude that HSG 22 (Burdiehouse) should

remain designated in the plan for housing development as shown on the proposals map.

Reporter's recommendations:

Modify the proposed plan by:

1. Adding a sentence in the text relating to Proposal SCH 8 Broomhills in Table 5:

   This is a preferred option in the revised education appraisal and may not be required.

2. Revising the bullet points within the development principles for HSG 21 (Broomhills) as follows:

   - address the relevant General Development Principles on transport and education for South East Edinburgh set out in paragraphs 118 to 120 above.

   - vehicular access should be taken from Frogston Road East and Burdiehouse Road with no direct route between the two access points. No vehicular access (including emergency) should be taken from Broomhills Road.

   - opportunity to change the character of Burdiehouse Road through street design, to enable and improve path connections across Burdiehouse Rd, provide street verges and trees, upgrade bus stops and create a residential frontage with a reduced speed limit.

   - a substantial public park should be provided on highest part of the site in line with open space Proposal GS 9 to reflect the landscape constraint of elevated terrain and outward views to the Pentland Hills and the city skyline.

   - tree belts should be provided to create a strong green belt boundary to the south and west of the site, as shown on the diagram. The width of these tree belts will depend upon the layout and design of housing and open space on the site. The tree belts should incorporate existing tree cover, provide habitat enhancements integrated with sustainable urban drainage provision and include a multi-user path to connect Burdiehouse Burn Valley Park to path networks at Morton Mains and Mortonhall.

   - a green corridor should be provided incorporating pedestrian and cycleway connections through site from Old Burdiehouse Road.

   - proposals for housing (including the finalised site capacity, design and layout), the school (if necessary), and any other uses provided on the site, should be informed by an adequate flood risk assessment. In addition, proposals should in particular avoid development in the area at risk of flooding in the south of the site, adjacent to the burn. Sustainable urban drainage will be required as appropriate, and as referred to in the bullet point relating to tree belts above.

3. Amending the first sentence of the text relating to Proposal HSG 22 (Burdiehouse) in Table 4 as follows:

   Planning permission has now been granted for development in the western part of the

site and development has commenced.

4. Deleting the second sentence from the first bullet point of the development principles for Proposal HSG 22 (Burdiehouse).

5. Adding a bullet point in the development principles for HSG 22 as follows:

   - address the relevant General Development Principles on transport and education for South East Edinburgh set out in paragraphs 118 to 120 above.

6. Amending the second bullet point of the development principles for HSG 22 as follows:

   - opportunity to change the character of Burdiehouse Road through street design, to enable and improve path connections across Burdiehouse Rd, provide street verges and trees, upgrade bus stops and create a residential frontage with a reduced speed limit.

7. Amending the word “must” to “should” in the third and fourth bullet points of the development principles for HSG 22.

8. Amending the fifth bullet point of the development principles for HSG 22 as follows:

   - tree planting to the south west of the site to form a new green belt boundary to the west of Burdiehouse Limekilns

9. Amending the sixth bullet point of the development principles for HSG 22 as follows:

   - woodland planting along the south east boundary, which should enhance the connectivity of woodland habitat and incorporate a multi-user path link to Burdiehouse Burn Valley Park.

10. Adding a bullet point to the development principles for HSG 22 as follows:

    - the finalised site capacity, design and layout should be informed by an adequate flood risk assessment.

Issue 8 Appendix A – HSG 21 Broomhills

0234	Charles Cornelius
0244	Tony Gray
0421	Finlay Valentine
0491	Fiona Gomes
0555	J James
0507	Evelyn Faulkner
0586	Jane McCann
0587	Albert Bennett
0697	Linda Wylie
0912	John Matear
0932	L Matheson
0983	Kay Dickson
1010	Elaine Dobbie
1011	Eric Dobbie
1035	Alex Thomson
1140	Diana Cairns
1151	George Baxter
1248	Robert Fitzpatrick
1256	Joan Bernard
1258	Peter Connolly
1259	Tom Jamieson
1260	Marjorie A White
1261	Robert and Irene Brydon
1264	Keith Salton
1265	Karen Mackenzie
1266	Linda Lothian
1267	Alex Jackson
1268	Iain Stavert
1269	Steffi Ludwig
1270	Lilian Fotheringham
1271	Michael Hughes
1273	L.V.H. Martin
1274	Ian Bernard
1275	Susan Hampson
1276	Veronica Wright
1277	Priscilla Ball
1738	Joyce Haldane
2031	John Stewart
2080	Susan Gill
2154	Keith Gill
2230	Kevin Gallagher
2319	Pamela Gallagher
2322	James Anderson
2323	Claire Anderson
2337	James Martin
2581	Stephen Hawkins
2635	Marion Stevenson
2639	David Morgan
2323	Clare Anderson
2337	James Martin
2435	Karen Grieve
2495	Yvonne Webster
2568	Stephen Hawkins
2635	Marion Stevenson
2639	David Morgan

Issue 8 Appendix B – HSG 22 Burdiehouse	
0507 Evelyn Faulkner	1256 Joan Bernard
0555 J James	1257 June Clark
0585 Bryan McCann	1258 Peter Connolly
0589 Sylvia Bennett	1259 Tom Jamieson
0910 Maureen Matear	1260 Marjorie A White
0984 James Dickson	1261 Robert Brydon
0988 Alan Deland	1262 Stanley Quate
1010 Elaine Dobbie	1263 Keith Ball
1011 Eric Dobbie	1274 Ian Bernard
1035 Alex Thomson	2031 John Stewart
1140 Diana Cairns	2052 Margaret S Gibson
1238 Mark Harris	2053 James Gibson
1248 Robert Fitzpatrick	2054 John J Gibson-Eaglesham
1249 John Lothian	2055 Lesley J Gibson-Eaglesham
1250 Helen Salton	2073 David Eaglesham
1251 Christine Stavert	2080 Susan Gill
1253 Mike Ludwig	2154 Keith Gill
1254 Douglas Fotheringham	2568 Stephen Hawkins
1255 E.A. Martin	2639 David Morgan

Issue 9	**New Greenfield Housing Proposals – SE Edinburgh SDA (2)**	
Development plan reference:	**HSG 23 Gilmerton Dykes Road** **HSG 24 Gilmerton Station Road** **HSG 25 The Drum)** **Part 1 Section 3 Table 4 pages 25 – 27** **Site Brief pages 62 – 63**	**Reporter:** Allison Coard

Body or person(s) submitting a representation raising the issue (including reference number):

15 individuals seeking removal of HSG 23 Gilmerton Dykes Road (see Issue 9 Appendix A) 57 individuals seeking removal of HSG 24 Gilmerton Station Road (see Issue 9 Appendix B) 24 individuals seeking removal of HSG 25 The Drum (see Issue 9 Appendix C)	Organisations, elected representatives and individuals other than those in Issue 10 Appendices A, B & C: 0004 Ann Nicoll 0118 Tracy Laidlaw 0244 Tony Gray 0247 Nicholas Trollope 0358 Gilmerton Inch Community Council 0492 Candlemaker's Residents Association 0741 Councillor Norma Austin Hart 1202 Land Options East 2088 Scottish Government 2126 Cockburn Association 2217 William Scott 2660 Kezia Dugdale MSP 2662 Ian Murray MP

Provision of the development plan to which the issue relates:	These provisions of the Plan deal with the proposals for new housing allocations (HSG 23 Gilmerton Dykes Road, HSG 24 Gilmerton Station Road and HSG 25 The Drum) in South East Edinburgh.

Planning authority's summary of the representation(s):

CONTEXT

The Main Issues Report consulted on the housing site options in South East Edinburgh, see question three, page 16:

- HSG 23 Gilmerton Dykes Road was consulted on as a preferred option;
- HSG 24 Gilmerton Station Road was consulted on as a preferred option;
- HSG 25 The Drum was consulted on as a preferred option.

The sites were included in the First Proposed Plan and received representations both objecting to their inclusion and supporting their inclusion as housing proposals. These representations were considered, however no significant changes were made to these housing proposals and they are included in the Second Proposed Plan.

Representations seeking removal of HSG 23 Gilmerton Dykes Road

Seek removal of HSG 23 on the grounds of one or more of the reasons listed below

- **Site selection** – Representations object on the grounds of loss of green belt, loss of agricultural land, landscape setting, use of brownfield sites first and the principle of sustainable development.
- **Transport Infrastructure** – concerns regarding traffic congestion, pollution, impact on road safety and emergency services. Gilmerton Road and its extension into Drum Street is a main arterial route into the city centre.
- **School Infrastructure** – concerned that the new primary school would not be able to accommodate the influx of new families into the area.
- **Community Facilities** – existing health care services are already operating at full capacity. Security and criminal activity is an ongoing issue in the area. The new housing would increase crime and put additional pressures on the local police service.
- **Biodiversity** – Further housing in the area will have a negative impact on biodiversity and natural habitat in the area.
- **Drainage and flood risk** – Concerned that these problems would become more frequent, with possible structural damage to basements and foundations. Existing problems with local sewage system.
- **Air Quality and Pollution** – Concerned about the impact of the proposed development on greenhouse gas emissions.
- **Ground conditions** – the area has subsidence from former mining.
- **Cultural Heritage** – South Farm is within the conservation area. Building on land at Gilmerton Dykes Road and Drum Street would seriously affect the conservation village and conservation area.
- **Residential Amenity** – concerns relating to loss of visual amenity, as well as daylight, sunlight and privacy.

(0358 Gilmerton Inch Community Council; 0741 Councillor Norma Austin Hart; 2660 Kezia Dugdale MSP; 2662 Ian Murray MP; 15 individuals listed in Issue 9 Appendix A)

Supports allocation of HSG 23

- Supports allocation of HSG 23 Gilmerton Dykes Road due to location, landscape containment, contribution to purposes of greenbelt designation, transport, housing choice, need and demand, delivery of affordable housing, site being effective. No objections to developer contributions on the basis that they meet the test set out in Circular 3/2012. **(1202 Land Options East)**

Representations opposed to HSG 23 Gilmerton Dykes Road in current form and seeking its removal and/or change

- Requests a review of the number of houses after further visual assessment. The Edinburgh Green Belt Review makes no specific comment on the landscape capacity for development on this elevated and exposed site. However, a main concern is ‘In this wider landscape context it is therefore important to retain the openness of south-facing slopes as a setting to the city, separation between settlements and a containing edge to the city.’ States that accurate photomontages of the proposed tree belts along the south and southeast boundaries of the site

may indicate the feasibility for the amount of housing. **(2126 Cockburn Association)**
- Requests further consideration for traffic using Newtoft Street and Ravenscroft Street/ Place for access to Gilmerton Dykes Road. **(0118 Tracy Laidlaw)**
- Considers the site to have inadequate access, particularly from Gilmerton Dykes Road. States that this issue needs to be addressed. Concerned also regarding the type of housing. States that affordable housing is needed. **(0004 Ann Nicoll)**

Representations seeking removal of HSG 24 Gilmerton Station Road

Seek removal of HSG 24 on the grounds of one or more of the reasons listed below:
- **Site selection** – Representations object on the grounds of loss of green belt, loss of agricultural land, landscape setting, use of brownfield sites first and the principle of sustainable development.
- **Transport Infrastructure** – Concerns regarding traffic congestion, pollution, impact on road safety and emergency services. Gilmerton Road and its extension Drum Street is a main arterial route into the city centre.
- **School Infrastructure** – Concerned that the new primary school would not be able to accommodate the influx of new families into the area.
- **Community Facilities** – Existing health care services are already operating at full capacity. Security and criminal activity is an ongoing issue in the area. The new housing would increase crime and put additional pressures on the local police service.
- **Biodiversity** – Further housing in the area will have a negative impact on biodiversity and natural habitat in the area.
- **Drainage and flood risk** – Concerned that these problems would become more frequent, with possibility to structural damage to basements and foundations. Existing problems with local sewage system.
- **Air Quality and Pollution** – Concerned about the impact of the proposed development on greenhouse gas emissions.
- **Ground conditions** – The area has subsidence from former mining.
- **Cultural Heritage** – South Farm is within the conservation area. Building on land at Gilmerton Dykes Road and Drum Street would seriously affect the conservation village and conservation area.
- **Residential Amenity** – Concerns relating to loss of visual amenity, as well as daylight, sunlight and privacy.

(0358 Gilmerton Inch Community Council; 0741 Councillor Norma Austin Hart; 2662 Ian Murray MP; 2660 Kezia Dugdale MSP; 57 individuals listed in Issue 9 Appendix B)

Representations opposed to HSG 24 Gilmerton Station Road in current form and seeking its removal and/or change

- Requests removal of HSG 24 on the grounds that it will be impossible to improve Gilmerton Crossroads (T20) and Burdiehouse (T21) junctions sufficiently to cope with the additional traffic from these developments and other adjacent developments in Midlothian. States that the Transport Appraisal does not specifically address cross boundary traffic flows into Edinburgh from adjacent SDP areas. **(0244 Tony Gray)**
- Requests that the proposed vehicular access points for HSG 24 be detailed in the

site brief and shown on the associated maps. Considers that without this information, it is impossible to fully comment on the feasibility of each site. **(0244 Tony Gray)**

- Requests a review of the number of houses after further visual assessment. The Edinburgh Green Belt Review makes no specific comment on the landscape capacity for development on this elevated and exposed site. However, a main concern is 'In this wider landscape context it is therefore important to retain the openness of south-facing slopes as a setting to the city, separation between settlements and a containing edge to the city.' States that accurate photomontages of the proposed tree belts along the south and southeast boundaries of the site may indicate the feasibility for the amount of housing. **(2126 Cockburn Association)**
- Objects to HSG 25 on the grounds of transport issues, daylight and privacy issues. Requests that a wooded edge would help contain the development and have 5 benefits for existing and new residents – it would screen new development during construction and when completed, keep the rural feel and character of the area, would rather look into trees than buildings, help promote bird and animal habitation, help act as a noise screen and privacy. Requests that semi mature trees are planted before any development. **(0247 Nicholas Trollope)**

<u>Representations seeking removal of HSG 25 The Drum</u>

Seek removal of HSG 25 on the grounds of one or more of the reasons listed below:

- **Site selection** – Representations object on the grounds of loss of green belt, loss of agricultural land, landscape setting, use of brownfield sites first and the principle of sustainable development. Consider also that the density of the site too high.
- **Transport Infrastructure** – Concerns regarding traffic congestion, pollution, impact on road safety and emergency services. Gilmerton Road and its extension Drum Street is a main arterial route into the city centre. Seeking the removal of the connecting path to Candlemaker's Estate.
- **School Infrastructure** – Concerned that the new primary school would not be able to accommodate the influx of new families into the area.
- **Community Facilities** – Existing health care services are already operating at full capacity. Security and criminal activity is an ongoing issue in the area. The new housing would increase crime and put additional pressures on the local police service.
- **Biodiversity** – Further housing in the area will have a negative impact on biodiversity and natural habitat in the area. The band of existing woodland north and west of site should be retained.
- **Drainage and flood risk** – Concerned that these problems would become more frequent, with possible structural damage to basements and foundations. Existing problems with local sewage system.
- **Air Quality and Pollution** – Concerned about the impact of the proposed development on greenhouse gas emissions.
- **Ground conditions** – The area has subsidence from former mining.
- **Cultural Heritage** – South Farm is within the conservation area. Building on land at Gilmerton Dykes Road and Drum Street would seriously affect the conservation village and conservation area.
- **Residential Amenity** – Concerns relating to loss of visual amenity, as well as daylight, sunlight and privacy.

(0358 Gilmerton Inch Community Council; 0741 Councillor Norma Austin Hart; 2660 Kezia Dugdale MSP; 2662 Ian Murray MP; 24 individuals listed in Issue 9 Appendix C)

Representations opposed to HSG 25 The Drum in current form and seeking its removal and/or change

- Requests that the proposed vehicular access points for HSG 25 be detailed in the site brief and shown on the associated maps. Considers that without this information, it is impossible to fully comment on the feasibility of each site. **(0244 Tony Gray)**
- Requests removal of HSG 25 from the Plan on the grounds of landscape impact. States that Edinburgh Green Belt Stage 1 (Landscape Character Area 49) gives this a significant landscape character score of 72, with no landscape capacity for development. States that most of the site also forms part of the Drum Estate Inventory of Gardens and Designed Landscapes where the policy and woodlands and parkland are important components of its setting. It also adjoins and forms the setting for a Special Landscape Area. Considers that the Plan Environmental Report 2nd Revision underrates the importance of the Edinburgh Green Belt Review 2 assessment and consequently has the potential of contravening Policy Env 7. **(2126 Cockburn Association)**
- Requests removal of proposal HSG 25 from the Plan. However, states that if the proposal is not withdrawn it should be amended to substantially reduce the density of the proposed housing, remove the connecting path to Candlemaker's Estate and retain band of existing woodland to north and west of site. **(0492 Candlemaker's Residents Association)**
- Objects generally to the development of green belt land. Concerned about the opening up of the northern most end of Candlemaker's Park for additional pedestrian, vehicular and cyclist access. Also expresses concern about the surrounding road network, particularly Drum Street to cope with the additional traffic and the impact this has on safety. **(2217 William Scott)**

Representations opposed to HSG 23,24 & 25 in current form and seeking its removal and/or change

- Given the potential scale of development and its proximity to the A720, particularly the Gilmerton Junction, it is considered that the associated trips generated will impact upon the trunk road network at this location. Considers that the cumulative impact of development from adjoining planning authority areas has not been considered within the Transport Appraisal undertaken by City of Edinburgh Council or the updated Transport Appraisal Addendum. As a consequence the potential impact of development on the A720 has not been fully assessed. **(2088 Scottish Government)**

Modifications sought by those submitting representations:

Representations seeking removal of HSG 23 Gilmerton Dykes Road

- Remove proposal HSG 23 Gilmerton Dykes Road from the Plan. **(0358 Gilmerton Inch Community Council; 0741 Councillor Norma Austin Hart; 2660 Kezia Dugdale; 2662 Ian Murray; 15 individuals listed in Issue 9 Appendix A)**

Representations opposed to HSG 23 Gilmerton Dykes Road in current form and seeking its removal and/or change

- Requests a review of the number of houses after further visual assessment. **(2126 Cockburn Association)**
- Suggests increasing road width on Newtoft Street and restrict parking to one side of Ravenscroft Street. **(0118 Tracy Laidlaw)**
- Requests that site access needs to be addressed. Requests for more affordable housing in this area. **(0004 Ann Nicoll)**

Representations seeking removal of HSG 24 Gilmerton Station Road

- Remove proposal HSG 24 Gilmerton Station Road from the Plan. **(0358 Gilmerton Inch Community Council; 0741 Councillor Norma Austin Hart; 2662 Ian Murray MP; 2660 Kezia Dugdale MSP; 57 individuals listed in Issue 9 Appendix B)**

Representations opposed to HSG 24 Gilmerton Station Road in current form and seeking its removal and/or change

- Remove proposal HSG 24 Gilmerton Station Road from the Plan and rewrite the Transport Appraisal to be more accurately assess traffic flows to and from Midlothian. **(0244 Tony Gray)**
- Requests that the proposed vehicular access points for HSG 24 be detailed in the site brief and shown on the associated maps. **(0244 Tony Gray)**
- Requests a review of the number of houses after further visual assessment. **(2126 Cockburn Association)**
- Requests that a wooded edge is planted to contain the site and that semi-mature trees are planted before any development. **(0247 Nicholas Trollope)**

Representations seeking removal of HSG 25 The Drum

- Remove proposal HSG 25 The Drum from the Plan. **(0358 Gilmerton Inch Community Council; 0741 Councillor Norma Austin Hart; 2660 Kezia Dugdale MSP; 2662 Ian Murray MP; 24 individuals listed in Issue 9 Appendix C)**

Representations opposed to HSG 25 The Drum in current form and seeking its removal and/or change

- Requests that the proposed vehicular access points for HSG 25 be detailed in the site brief and shown on the associated maps. **(0244 Tony Gray)**
- Requests removal of HSG 25 from the Plan on the grounds of landscape impact. **(2126 Cockburn Association)**
- Requests removal of proposal HSG 25 from the Plan. However, states that if the proposal is not withdrawn it should be amended to substantially reduce the density of the proposed housing, remove the connecting path to Candlemaker's Estate and retain band of existing woodland to north and west of site. **(0492 Candlemaker's Residents Association)**
- Objects generally to the development of green belt land. Concerned about the opening up of the northern most end of Candlemaker's Park for additional pedestrian, vehicular and cyclist access. Also expresses concern about the

surrounding road network, particularly Drum Street to cope with the additional traffic and the impact this has on safety. **(2217 William Scott)**

Representations opposed to HSG 23,24 & 25 in current form and seeking its removal and/or change

- Transport Scotland requests that the following bullet point be added to HSG 23, HSG 24 and HSG 25 development principles -'Contribution towards junction improvements at A720, Gilmerton Junction'. The Action Programme should be updated accordingly. **(2088 Scottish Government)**

Summary of responses (including reasons) by planning authority:

Site selection - HSG 23 Gilmerton Dykes Road, HSG 24 Gilmerton Station Road and HSG 25 The Drum

- The Plan must conform to the relevant provisions of the approved SDP and its Supplementary Guidance. These include a requirement for a generous allocation of housing land in the Council's area and the designation of a green belt around Edinburgh (SDP Policies 5, 7 and 12).

In preparing the Plan, the Council has sought to meet the overall housing land requirement in ways which prioritise use of brownfield sites in existing urban areas and which minimise the loss of land from the green belt, in accordance with SDP paragraphs 113 and 130. The Council's response to the representations in Issue 5 explains why it is nevertheless necessary for this Plan to make significant new releases of greenfield land from the green belt at this time, and of the scale set out in the Second Proposed Plan.

In selecting greenfield housing sites for release, the Council has sought to minimise the impact on greenbelt objectives and to secure long-term boundaries, in accordance with SDP Policy 12 and paragraph 130. To do so, the Council has assessed relevant greenfield land for its suitability in these terms. The site assessment process has gathered evidence on the relevant land on a systematic and consistent basis and presented its findings in a way which enables comparison and hence selection of those sites which are most appropriate. This approach has been informed by consideration of the findings and recommendations of the Report of Inquiry for the Edinburgh City Local Plan (pages 1-21 to 1-26).

For the Plan the Council has set out the evidence of its housing site assessment in the project's Environmental Report, which also presents the statutory Strategic Environmental Assessment of the Plan. The method and criteria used in the site selection process are described in Volume 1 of the Environmental Report – Second Revision, pages 26-33. The site assessments are set out in Appendices 5-9 (Volume 2) and, for some sites, the Environmental Report Addendum. At each stage of the Plan project the Environmental Report has been revised and updated as appropriate to:

- show what regard has been had to statutory representations received at the previous stage;
- respond to changes in the SDP context to the Plan, which have required additional housing land to be found.

The criteria used for the housing site assessment are set out in Tables 6 and 7 of

the Environmental Report (Volume 1). They are structured using the three objectives for green belts stated in Scottish Planning Policy paragraph 49 and SDP Policy 12. They correspond to SDP policies and the content of Scottish Planning Policy as set out in Table 1, page 3 of the Environmental Report Addendum. The assessment findings set out in the appendices of the Environmental Report include the Council's overall conclusions about whether some or all of a site should be allocated in the Plan.

For ease of comparison, the assessment findings are presented in matrix form in Appendix 2 Updated of the Environmental Report Addendum (an updated version of Appendix 2 of the Environmental Report – Second Revision (Volume 1)). This is intended to be a similar format to that used in the Edinburgh City Local Plan Report of Inquiry. The Plan assessment uses a 'traffic light' symbology to indicate whether a site meets a criterion (green), does not meet it (red), or partly meets it / uncertainty (amber).

For sites selected and allocated in the Plan, a separate, statutory assessment of their likely environmental effects is set out in Appendix 3 of Volume 1 of the Environmental Report. In some cases this identifies likely adverse impacts. Section 4 of the Environmental Report sets these out along with proposed mitigation. This site selection process has resulted in the Second Proposed Plan's spatial strategy, summarised on Figure 1 of the Plan. It meets the housing land requirements in full while designating a green belt which best meets the objectives of Scottish Planning Policy and SDP Policy 12. The Second Proposed Plan's spatial strategy establishes and maintains strong, clear long-term boundaries to control the outward growth of the city.

The allocation of these sites HSG 23, HSG 24 and HSG 25 in the Plan is therefore appropriate in terms of compliance with Scottish Planning Policy and SDP Policies 1 A & B, 5, 7, 8, 9 and 12.

No modification proposed.

<u>Representations seeking removal of HSG 23 Gilmerton Dykes Road</u>

- **Site Selection -** See Council's response on site selection and principle of development on Page 6.
- **Transport Infrastructure -** As part of the Plan process, the Council has carried out a Transport Appraisal. (Volumes 1 and 2, 2013, Addendum, 2014) This appraised the cumulative impact of the new developments proposed in the Plan, taking account of other factors. This identifies improvements to transport infrastructure to deal with the net impact of new housing proposals in South East Edinburgh. These transport actions are set out in the Council's Proposed Action Programme pages 29-31. For Gilmerton Dykes Road, the actions include reconfiguration of junction with access and parking strategy for Drum Street; enhancements to peak period bus capacity and provision of new cycle and footpath links. All relevant proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.
- **School Infrastructure -** As part of the Plan process, the Council has prepared a Revised Education Appraisal June 2014 (corrected September 2014) which identifies the improvements to school infrastructure to deal with the net impact of

new housing proposals in South East Edinburgh. These Education actions are set out within the Council's Proposed Action Programme, pages 24-27. For Gilmerton Dykes Road these actions details two options. Option one includes a new Gilmerton South Primary School (SCH 7), new Broomhill Primary School (SCH 8) and extensions to South East Edinburgh High Schools. All proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.

- **Community Facilities** – The Plan in paragraph 72 acknowledges that housing proposals will have implications for the provision of primary healthcare and other community health services. Policy Hou 10 Community Facilities seeks to ensure that where practical and reasonable a range of community facilities is provided with new housing development. The Plan identifies where non-residential units should be provided in new housing sites which could provide potential premises for new health practices. Paragraph 130 of the Plan states that developer contributions to measures intended to mitigate the net effects of development, other than actions identified in the Action Programme, may also be required. The Council has discussed all growth allocations with the relevant part of NHS Lothian. This has assessed the need for new and expanded general practitioner practices to accommodate the planned housing growth set out in the Second Proposed Plan. No specific actions have been included in the Action Programme at this time, however when suitable and specific actions are identified these will be included in future iterations of the Action Programme. Where these are needed to address demand arising from new development, financial contributions towards the cost may be sought in line with relevant policies and guidance.

Concerns relating to impacts on police resourcing capacity are not matters for the planning system to address. This concern should be raised with the relevant police administration.

- **Biodiversity -** In preparing a Local Development Plan, the Council must comply with the Scottish Biodiversity Duty. This has been done by carrying out a Strategic Environmental Assessment. One of the objectives of the Strategic Environmental Assessment is to 'Protect and enhance biodiversity, flora and fauna, and habitat networks'. The Strategic Environmental Assessment's findings are available in the Environmental Report. Volume 1 page 34 sets out the method of assessment, which uses the maps in Volume 2 (page 3). The relevant findings regarding Gilmerton Dykes Road are set out in Volume 1 page 71.The allocations do not have a significant harmful effect on biodiversity, flora or fauna.
- **Drainage and Flood risk -** In preparing a Local Development Plan, the Council must consider the impact of development on flood risk. The new Local Development Plan proposals have been assessed strategically for flood risk using a fluvial flood risk map showing areas at medium-to-high risk (i.e. a 1-in-200 year event) (Figure 3 of the Environmental Report Volume 1, page 21 and Volume 2 page 52) This fluvial flood risk map was updated using Scottish Environmental Protection Agency's new mapping published in January 2014. At Gilmerton Dykes Road, the Plan does not newly allocate any developable land in shown areas of fluvial flood risk. The issue of flood risk for all developments, not just the Plan proposals is addressed through Policy Env 2.
- **Air Quality and Pollution -** The Environmental Report identifies this as one of the main environmental issues currently prevalent within the Council area (Volume 1, page 40). It finds that the Plan's general supportive development policies may lead to further negative cumulative and synergistic effects, particularly within key transport corridors. The current air quality issues are attributed mainly to traffic

congestion and Air Quality Management Areas are in place with Council action plans setting out measures to help reduce vehicle emissions within these areas. The Council's Local Transport Strategy (2014-2019) identifies a range of actions and policies to reduce emissions and improve air quality standards across the city. With specific regard to new allocations in strategic development areas, the Environmental Report identifies the potential for a short-to-medium harmful impact. Mitigation measures include:

  - Locating development in accessible locations
  - A number of public transport improvements
  - Other measures identified in site briefs and development principles in the Plan.

- **Ground Conditions -** The issue of ground stability for all developments, not just Plan proposals is addressed through Policy Env 22. A site investigation as part of a planning application requires potential ground hazards to be identified with mitigation measures included. Site capacities included in the Plan are based on a density range of 25 to 35 dwellings per hectare. The range has been provided to allow flexibility in the masterplan, e.g. if ground conditions affect site layout.
- **Cultural Heritage -** Potential impact on conservation area character and setting will be addressed as part of a planning application with due consideration of Policy Env 6 Conservation Area-Development and is consistent with the relevant conservation character appraisal (e.g Gilmerton). The site is not within or adjacent to a World Heritage Site.
- **Residential Amenity -** Development impact on residential amenity is addressed through Policy Des 5 as part of a planning application.

No modification proposed.

(0358 Gilmerton Inch Community Council; 0741 Councillor Norma Austin Hart; 2660 Kezia Dugdale MSP; 2662 Ian Murray MP; 15 individuals listed in Issue 9 Appendix A)

Representations opposed to HSG 23 Gilmerton Dykes Road in current form and seeking its removal and/or change

- The Plan specifies an estimate of site capacity towards meeting strategic housing requirements. This is based on a density range of 25-35 units per hectare and takes into account landscape and other known site constraints, as shown on page 113 of the Environmental Report - Second Revision, Volume 2 June 2014. Any masterplan would be assessed as part of the planning application against the Council's design and environmental policies, which would consider these matters in detail, in particular through Policy Des 4 – Impact on Setting and Policy Des 9 – Urban Edge Development. **(2126 Cockburn Association)**
- As part of the Local Development Plan process, the Council has carried out a Transport Appraisal (Volumes 1 and 2, 2013, Addendum, 2014). This appraised the cumulative impact of the new developments proposed in the Plan, taking account of other factors. This identifies improvements to transport infrastructure to deal with the net impact of new housing proposals in South East Edinburgh. These transport actions are set out in the Council's Proposed Action Programme pages 29-31. For Gilmerton Dykes Road, the actions include reconfiguration of junction with access and parking strategy for Drum Street; enhancements to peak period

bus capacity and provision of new cycle and footpath links. All relevant proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance. Increasing road width on Newtoft Street and restricting parking to one side of Ravenscroft Street were not identified as specific actions. **(0118 Tracy Laidlaw; 0004 Ann Nicoll)**

Representations seeking removal of HSG 24 Gilmerton Station Road

- **Site Selection -** See Council's response on site selection and principle of development on Page 6.
- **Transport infrastructure -** As part of the Local Development Plan process, the Council has carried out a Transport Appraisal. (Volumes 1 and 2, 2013, Addendum, 2014) This appraised the cumulative impact of the new developments proposed in the Plan, taking account of other factors. This identifies improvements to transport infrastructure to deal with the net impact of new housing proposals in South East Edinburgh. These transport actions are set out in the Council's Proposed Action Programme page 29-31. For Gilmerton Station Road, the actions include junction improvements at Gilmerton Road/ Drum Street; enhanced access and parking strategy for Drum Street; enhancements to peak period bus capacity and improvements to walking and cycling networks. The detail of these actions is being established through transport assessments required at the planning application stage. All relevant proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.
- **School Infrastructure -** As part of the Plan process, the Council has prepared a Revised Education Appraisal June 2014 (corrected September 2014) which identifies the improvements to school infrastructure to deal with the net impact of new housing proposals in South East Edinburgh. These Education actions are set out within the Council's Proposed Action Programme, pages 24-27. For Gilmerton Station Road these actions details two options. Option one includes a new Gilmerton South Primary School (SCH 7), new Broomhill Primary School (SCH 8) and extensions to South East Edinburgh High Schools. Option 2 is to expand existing primary schools in the area. This would require extending Gracemount and Gilmerton Primary Schools to four stream (29 class) and potentially involve catchment reviews and smaller extensions at Liberton and Craigour Park Primary Schools. There are currently no four stream primary schools with the City of Edinburgh's estate. A detailed feasibility study is required before this option can be confirmed.
- All proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.
- **Community Facilities** – The Plan in paragraph 72 acknowledges that housing proposals will have implications for the provision of primary healthcare and other community health services. Policy Hou 10 Community Facilities seeks to ensure that where practical and reasonable a range of community facilities is provided with new housing development. The Plan identifies where non-residential units should be provided in new housing sites which could provide potential premises for new health practices. Paragraph 130 of the Plan states that developer contributions to measures intended to mitigate the net effects of development, other than actions identified in the Action Programme, may also be required. The Council has discussed all growth allocations with the relevant part of NHS Lothian. This has assessed the need for new and expanded general practitioner practices to accommodate the planned housing growth set out in the Second Proposed

Plan. No specific actions have been included in the Action Programme at this time, however when suitable and specific actions are identified these will be included in future iterations of the Action Programme. Where these are needed to address demand arising from new development, financial contributions towards the cost may be sought in line with relevant policies and guidance.

Concerns relating to impacts on police resourcing capacity are not matters for the planning system to address. This concern should be raised with the relevant police administration.

- **Biodiversity -** In preparing a Local Development Plan, the Council must comply with the Scottish Biodiversity Duty. This has been done by carrying out a Strategic Environmental Assessment. One of the objectives of the Strategic Environmental Assessment is to 'Protect and enhance biodiversity, flora and fauna, and habitat networks'. The Strategic Environmental Assessment's findings are available in the Environmental Report. Volume 1 page 34 sets out the method of assessment, which uses the maps in Volume 2 (page 3). The relevant findings regarding Gilmerton Station Road are set out in Volume 1 page 71.The allocations do not have a significant harmful effect on biodiversity, flora or fauna.
- **Drainage and Flood risk -** In preparing a Local Development Plan, the Council must consider the impact of development on flood risk. The new Local Development Plan proposals have been assessed strategically for flood risk using a fluvial flood risk map showing areas at medium-to-high risk (i.e. a 1-in-200 year event) (Figure 3 of the Environmental Report Volume 1, page 21 and Volume 2 page 52). This fluvial flood risk map was updated using Scottish Environmental Protection Agency's new mapping published in January 2014. At Gilmerton Station Road, the Plan does not newly allocate any developable land in shown areas of fluvial flood risk. The issue of flood risk for all developments, not just the Plan proposals, is addressed through Policy Env 2.
- **Air Quality and Pollution -** The Environmental Report identifies this as one of the main environmental issues currently prevalent within the Council area (Volume 1, page 40). It finds that the Plan's general supportive development policies may lead to further negative cumulative and synergistic effects, particularly within key transport corridors. The current air quality issues are attributed mainly to traffic congestion and Air Quality Management Areas are in place with Council action plans setting out measures to help reduce vehicle emissions within these areas. The Council's Local Transport Strategy (2014-2019) identifies a range of actions and policies to reduce emissions and improve air quality standards across the city. With specific regard to new allocations in strategic development areas, the Environmental Report identifies the potential for a short-to-medium harmful impact. Mitigation measures include:
    - Locating development in accessible locations
    - A number of public transport improvements
    - Other measures identified in site briefs and development principles in the Plan
- **Ground Conditions -** The issue of ground stability for all developments, not just the Plan proposals, is addressed through Policy Env 22. A site investigation as part of a planning application requires potential ground hazards to be identified with mitigation measures included. Site capacities included in the Plan are based on a density range of 25 to 35 dwellings per hectare. The range has been provided to allow flexibility, e.g. if ground conditions affect site layout.
- **Cultural Heritage -** Potential impact on conservation area character and setting will be addressed as part of a planning application with due consideration of Policy

Env 6 Conservation Area-Development and the relevant conservation character appraisal (e.g. Gilmerton). The site is not within or adjacent to a World Heritage Site.

- **Residential Amenity -** Development impact on residential amenity is addressed through Policy Des 5 as part of a planning application.

No modification proposed.

(0358 Gilmerton Inch Community Council; 0741 Councillor Norma Austin Hart; 2662 Ian Murray MP; 2660 Kezia Dugdale MSP; 57 individuals listed in Issue 9 Appendix B)

Representations opposed to HSG 24 Gilmerton Station Road in current form and seeking its removal and/or changes

- It is noted that Plans should take account of the cross boundary transport implications of all policies and proposals. The study that Transport Scotland is currently progressing with the SESplan authorities is intended to address cross-boundary impacts of the development proposals. The scope is agreed and Transport Scotland is contributing to the study. The outputs of the study will inform future annual iterations of the Developer Contribution and Affordable Housing Guidance and the Plan Action Programme as appropriate. No modification proposed. **(0244 Tony Gray)**
- Details of vehicular access for HSG 24 will be addressed through the planning application process in the masterplan taking account of policies Des 7 and Tra 1 in Part 2 of the Plan. No modification proposed. **(0244 Tony Gray)**
- The Plan specifies an estimate of site capacity towards meeting strategic housing requirements. This is based on a density range of 25-35 units per hectare and takes into account landscape and other known site constraints, as shown on page 113 of the Environmental Report - Second Revision, Volume 2, June 2014. Any masterplan would be assessed as part of the planning application against the Council's design and environmental policies, which would consider these matters in detail, in particular through policies Des 4 – Impact on Setting and Des 9 – Urban Edge Development. No modification proposed. **(2126 Cockburn Association)**
- The site brief on page 62 in Part 1 of the Plan specifies the provision of a new 50m wide tree belt to west of the site only to form new green belt boundary, enhance connectivity of woodland habitat and incorporating a multi-user path link from Gilmerton Dykes Road to Gilmerton Station Road. **(0247 Nicholas Trollope)**

Representations seeking removal of HSG 25 The Drum

- **Site Selection -** See Council's response on site selection and principle of development on Page 6.

It is appropriate for planning authorities to identify the capacities of housing sites in their Local Development Plans. To do so, it is necessary for them to make assumptions about density. The density assumption at The Drum comes from multiplying the developable area identified on page 113 of the Environmental Report – Second Revision Volume 2 (5 hectares), by the density range on page 28 of Volume 1 (27.5 to 32.5 dwellings per hectare). This is supported by National Planning Framework 3 and Scottish Planning Policy. National Planning Framework 3 paragraph 2.20 provides support for increased

densities in key locations which are well served by public transport. South East Edinburgh is one such location, and the good accessibility of part of The Drum site is one of the reasons for its allocation in the Plan. Scottish Planning Policy in paragraphs 45 and 46 supports the use of higher densities to help achieve some of the six qualities of successful places.

- **Transport Infrastructure -** As part of the Local Development Plan process, the Council has carried out a Transport Appraisal. (Volumes 1 and 2, 2013, Addendum, 2014) This appraised the cumulative impact of the new developments proposed in the Plan, taking account of other factors. This identifies improvements to transport infrastructure to deal with the net impact of new housing proposals in South East Edinburgh. These transport actions are set out in the Council's Proposed Action Programme page 29-31. For The Drum, the actions include junction improvements at Gilmerton Road/ Drum Street; enhanced access and parking strategy for Drum Street; enhancements to peak period bus capacity and improvements to walking and cycling networks. The detail of these actions is being established through transport assessments required at the planning application stage. All relevant proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.
- **School Infrastructure -** As part of the Plan process, the Council has prepared a Revised Education Appraisal June 2014 (corrected September 2014) which identifies the improvements to school infrastructure to deal with the net impact of new housing proposals in South East Edinburgh. These Education actions are set out within the Council's Proposed Action Programme, pages 24-27. For The Drum these actions details two options. Option one includes a new Gilmerton South Primary School (SCH 7), new Broomhill Primary School (SCH 8) and extensions to South East Edinburgh High Schools. All proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.
- **Community Facilities** – The Plan in paragraph 72 acknowledges that housing proposals will have implications for the provision of primary healthcare and other community health services. Policy Hou 10 Community Facilities seeks to ensure that where practical and reasonable a range of community facilities is provided with new housing development. The Plan identifies where non-residential units should be provided in new housing sites which could provide potential premises for new health practices. Paragraph 130 of the Plan states that developer contributions to measures intended to mitigate the net effects of development, other than actions identified in the Action Programme, may also be required. The Council has discussed all growth allocations with the relevant part of NHS Lothian. This has assessed the need for new and expanded general practitioner practices to accommodate the planned housing growth set out in the Second Proposed Plan. No specific actions have been included in the Action Programme at this time, however when suitable and specific actions are identified these will be included in future iterations of the Action Programme. Where these are needed to address demand arising from new development, financial contributions towards the cost may be sought in line with relevant policies and guidance.

Concerns relating to impacts on police resourcing capacity are not matters for the planning system to address. This concern should be raised with the relevant police administration.

- **Biodiversity -** In preparing a Local Development Plan, the Council must comply with the Scottish Biodiversity Duty. This has been done by carrying out a Strategic

Environmental Assessment. One of the objectives of the Strategic Environmental Assessment is to 'Protect and enhance biodiversity, flora and fauna, and habitat networks'. The Strategic Environmental Assessment's findings are available in the Environmental Report. Volume 1 page 34 sets out the method of assessment, which uses the maps in Volume 2 (page 3). The relevant findings regarding The Drum are set out in Volume 1 page 71-72.The allocations do not have a significant harmful effect on biodiversity, flora or fauna.

The Development Principles for The Drum on pages 62-63 of the Plan set out the broad site specific objectives for proposed allocations, any alteration to these should be justified through submission of a comprehensive masterplan at the planning application stage and through development of detailed design solutions.

- **Drainage and Flood risk**. In preparing a Local Development Plan, the Council must consider the impact of development on flood risk. The new Plan proposals have been assessed strategically for flood risk using a fluvial flood risk map showing areas at medium-to-high risk (i.e. a 1-in-200 year event) (Figure 3 of the Environmental Report Volume 1, page 21 and Volume 2 page 52). This fluvial flood risk map was updated using Scottish Environmental Protection Agency's new mapping published in January 2014. At The Drum, the Plan does not newly allocate any developable land in shown areas of fluvial flood risk. The issue of flood risk for all developments, not just Plan proposals is addressed through Policy Env 2.
- **Air Quality and Pollution.** The Environmental Report identifies this as one of the main environmental issues currently prevalent within the Council area (Volume 1, page 40). It finds that the Plan's general supportive development policies may lead to further negative cumulative and synergistic effects, particularly within key transport corridors. The current air quality issues are attributed mainly to traffic congestion and Air Quality Management Areas are in place with Council action plans setting out measures to help reduce vehicle emissions within these areas. The Council's Local Transport Strategy (2014-2019) identifies a range of actions and policies to reduce emissions and improve air quality standards across the city. With specific regard to new allocations in strategic development areas, the Environmental Report identifies the potential for a short-to-medium harmful impact. Mitigation measures include:

    - Locating development in accessible locations
    - A number of public transport improvements
    - Other measures identified in site briefs and development principles in the Plan

- **Ground Conditions** - The issue of ground stability for all developments, not just Plan's proposals, is addressed through Policy Env 22. A site investigation as part of a planning application requires potential ground hazards to be identified with mitigation measures included. Site capacities included in the Plan are based on a density range of 25 to 35 dwellings per hectare. The range has been provided to allow flexibility, e.g. if ground conditions affect site layout.
- **Cultural Heritage** - Potential impact on conservation area character and setting will be addressed as part of a planning application with due consideration of Policy Env 6 Conservation Area-Development and the relevant conservation character appraisal (e.g Gilmerton). The site is not within or adjacent to a World Heritage Site.

- **Residential Amenity -** Development impact on residential amenity is addressed through Policy Des 5 as part of a planning application.

No modification proposed.

(0358 Gilmerton Inch Community Council; 0741 Councillor Norma Austin Hart; 2660 Kezia Dugdale MSP; 2662 Ian Murray MP; 24 individuals listed in Issue 9 Appendix C)

Representations opposed to HSG 25 The Drum in current form and seeking its removal and/or change

- Details of vehicular access for HSG 25 will be addressed through the planning application process in the masterplan taking account of policies Des 7 and Tra 1 in Part 2 of the Plan. No modification proposed. **(0244 Tony Gray)**
- This land was assessed as part of the assessment area 'Drum North', as set out on pages 85-88 of the Environmental Report - Second Revision, Volume 2, June 2014. The assessment found that 'due to previous mineral and landfill operations, which have altered the site's landform and historic landscape character, it is considered that housing development could be accommodated without significant adverse effects on The Drum Inventory Site'. A new long-term boundary to the green belt and Inventory site would be required along the banking to the north and east of the site. Historic Scotland has confirmed they support the inclusion of this site within the Second Proposed Plan, refer to letter dated 28.06.2012. No modification proposed. **(2126 Cockburn Association)**
- The opportunity to rationalise the proposed woodland to the north and west of the site is stated in the Site Development Principles on pages 62-63 of the Plan in order to allow for the integration of development with the existing amenity greenspace and residential areas. At the planning application stage, this would be considered against Policy Env 12 Trees, with replacement planting required as necessary. No modification proposed. **(0492 Candlemaker's Residents Association)**
- The opportunity to integrate new development with existing residential areas is stated in the Site Development Principles (HSG 25) in order to allow for the integration of development with existing networks to encourage ease of access for various modes. At the planning application stage, this would be considered against Policy Des 7 Layout Design. For HSG 25 The Drum, the transport actions include junction improvements at Gilmerton Road/ Drum Street; enhanced access and parking strategy for Drum Street; enhancements to peak period bus capacity and improvements to walking and cycling networks. The detail of these actions is being established through transport assessments required at the planning application stage. No modification proposed. **(2217 William Scott)**

Representations opposed to HSG 23,24 & 25 in current form and seeking its removal and/or change

- It is noted that Plans should take account of the cross boundary transport implications of all policies and proposals. The study that Transport Scotland is currently progressing with the SESplan authorities is intended to address cross boundary impacts of the development proposals. The scope is agreed and Transport Scotland is contributing to the study. The outputs of the study will inform future annual iterations of the Developer Contribution and Affordable Housing

Guidance and the Plan Action Programme as appropriate. No modification proposed. **(2088 Scottish Government)**

Reporter's conclusions:

General

1. The housing land requirement is set out in the strategic plan for the area, SESplan. It's associated supplementary guidance- Housing Land November 2014 breaks down the requirement for each of the council areas including the City of Edinburgh. There is a statutory requirement for this local plan to demonstrate consistency with SESplan. In this context the proposed plan must identify a corresponding supply of housing land which should be effective or capable of becoming effective in the relevant timeframe.

2. These matters are assessed in more detail through my conclusions on Issue 5. I recognise the importance of the city's significant brownfield resource in providing future housing and enabling regeneration of the waterfront and other areas. Representations call for brownfield land to be developed first instead of sites in the current greenbelt. However the strategic plan sets a challenging housing target and accepts that greenfield release will be required. Market and economic conditions indicate that brownfield sites are unlikely to contribute a significant amount to housing completions in the short term. My assessment through Issue 5 demonstrates the particular requirement for sites to contribute to the housing land supply in the early years of the plan period.

3. HSG23 (Gilmerton Dykes Road) and HSG24(Gilmerton Station Road) and the Drum(HSG25) are grouped together in the proposed plan through the Gilmerton Site Brief on pages 62 and 63 of the proposed plan. They form part of a significant release of sites currently within the green belt on the west and south-east edges of the city.

4. Representations question why this is the only area where green belt release is proposed. However the plan also includes proposals on sites that are currently in the green belt in other locations. These include West Edinburgh, Queensferry, Balerno and Brunstane. I am aware that other sites, close to Gilmerton, at Edmonstone and the Wisp now have planning permission. These sites are recommended for inclusion in the plan through Issue 14. However, my conclusions on Issue 5 support additional housing land over and above that identified in the plan. Consequently, I do not consider deletion of any of these three sites would be justified solely on the basis that sufficient land is already available. That said my conclusions in Issue 5 accept that, irrespective of issues with programming, it is reasonable for communities and others to expect transparency between SESplan and this local development plan in terms of the general spatial distribution and overall capacity of housing sites.

5. SESplan recognises South East Edinburgh as a Strategic Development Area which also extends into the Midlothian Council area. This area is served by the City Bypass and Sheriffhall Roundabout. The strategic plan recognises that these are operating close to capacity and are severely congested at peak times. Growth in South East Edinburgh through green belt release where necessary has been promoted since the 1990's. This was based on public transport accessibility and lower landscape quality. Table 3 of SESplan identified South East Edinburgh as the second highest source of anticipated housing completions second only to the Edinburgh Waterfront.

6. Whilst the objective of retaining long term robust boundaries for the green belt applies

the proposed plan must respond to the strategic development requirements as established through SESplan. I consider that the principle of green belt release in the South East Edinburgh Strategic Development Area is supported through the development plan strategy.

7. These sites were selected through the council's assessment process. This established a range of criteria against which the suitability of sites for inclusion could be assessed and compared. The criteria used for the housing site assessment are set out in Tables 6 and 7 of the Environmental Report (Volume 1). The council has assessed these sites in south-east Edinburgh through its Environmental Report Second Revision Volume 2 June 2014 under the headings North of Gilmerton Station Road and Drum North. For sites selected and allocated in the plan, a separate, statutory assessment of their likely environmental effects is set out in Appendix 3 of Volume 1 of the Environmental Report.

8. In responding to the matters raised in representation on these sites I have drawn on these assessments along with the Habitat Regulation Appraisal the Second Proposed Action Programme May 2015 and the council's education and transport appraisals. I have also considered the supporting documents lodged with representations. The council's submissions of 7 October 2015 in response to Further Information Request 3 are relevant to my considerations regarding delivery of the required infrastructure. There is considerable cross over between the issues raised on these sites and the more general conclusions reached through Issues 2, 5, 19 and 20.

Transport Impacts- General

9. Many representations reference particular concerns about existing traffic and road safety issues which they consider will be exacerbated by the proposed development. These include-

- Congestion and gridlock on the main arterial routes into the city
- Restricted width of Drum Street on the southern approach to the junction, which is further narrowed by parked vehicles, making it difficult for buses and other wide vehicles to pass one another.
- Impact on the residential area around Gilmerton Dykes Road
- Difficulties in securing sufficient improvement of Gilmerton cross-roads.
- Restricted access along Newtoft Street and Ravenscroft Street.
- Impact on the Trunk Road network particularly Gilmerton junction.
- Inadequacy of the proposed mitigation
- Failure to take account of development in Midlothian and consequent cumulative impact

10. I note the photographs submitted by Mr Trollope which serve to illustrate the extent of traffic queuing along Gilmerton Station Road on the approach to the junction. Table 4.4 of the council's Transport Appraisal illustrates the increase in trips generated in South-East Edinburgh over the plan period and the particularly high anticipated impact on the A701 Liberton and A772 Gilmerton Road.

11. My site visit confirmed existing congestion at peak times and likely difficulties associated with addressing the capacity of junctions and the local road network particularly along Drum Street and due to constraints imposed by the configuration of the local road network. It is also significant that Transport Scotland in its submissions and

through the hearing held on 19 November raised concern about cumulative and cross boundary traffic impacts in south east Edinburgh. In its closing submissions to the hearing it states "the Transport Assessment does not adequately assess the cumulative effects of development sites on the strategic network within the LDP area or on specific parts of the network outwith the council area including Sheriffhall on the A720(T) and on the Gilmerton junction.

12. Consequently, Transport Scotland is in a position where it cannot take a fully informed view of the potential cumulative or cross boundary impacts of the Local Development Plan spatial strategy on the trunk road network. It considers that the Transport Appraisal Volumes 1 and 2 (produced in 2013) (undertaken to inform the first Proposed Plan) and the Addendum (June 2014) do not meet the requirements of SESplan in terms of both cumulative and cross boundary assessment. Transport Scotland considers it essential that any strategic infrastructure referenced in the Action Plan should be fully explained and included within the local development plan.

13. Paragraph 117 of the proposed plan states that transport interventions necessary to mitigate the impacts of the new housing proposals in south-east Edinburgh have been identified through the LDP transport appraisal. It also states that Transport Assessment will be required at the planning application stage to establish the details of the proposed measures and how mode share targets will be met.

14. Table 9 references action to address the efficiency of Gilmerton Crossroads (T20) in association with the development of HSG24 Gilmerton Station Road. The Second Proposed Action Programme translates this assessment into strategic infrastructure actions- where multiple developments should contribute to delivery of these actions. In these areas contribution zones are established to secure developer requirements. The Action Programme attributes the Gilmerton Crossroads works to all three sites in this area. It references reconfiguration of the junction with access and a parking strategy for Drum Street to alleviate congestion caused by park cars close to the junction. Site specific transport interventions are identified drawing on the conclusions of the council's transport appraisal.

15. Action is also identified in relation to upgrading of the Sherifhall Roundabout. However the funding for this is not specifically addressed. The council's response to Further Information Request 3 confirms its view that this action is not related to the local development plan housing allocations. Its transport appraisal does not identify impact on the Trunk Road network.

<u>Conclusions on transport Impact</u>

16. Drawing all of this together, I understand the significant concerns about traffic impact in an already congested area of the city. Inevitably a growing city has to deal with significant traffic growth. One of the main ways to address this is to direct future development to locations which enable other transport choices rather than reliance on the private car. In this respect I consider the south east Edinburgh Strategic Development Area is well located to enable good accessibility by public transport. This reflects the emphasis of Scottish Planning Policy and the council's transport appraisal. Nonetheless, I accept that alone and in combination these sites will have a significant local impact on the road network.

17. To address these impacts the council has identified a range of interventions.

Representations question the sufficiency of the proposed improvements and the extent of the works required. Reference to the conclusions in Issue 19 casts some doubt on the sufficiency of the council's approach to transport appraisal and the consequent adequacy of the proposed mitigation. Based on our conclusions in Issue 19 and on the evidence of Transport Scotland it is clear that the council has not fully assessed the cumulative and cross boundary implications of the plan in the context of SESplan policy 8.

18. The closing statement of Transport Scotland indicates that this deficiency could be at least partly addressed through a new policy. This would require developers to take into account the emerging conclusions of the cross boundary study and include a policy 'hook' to the developer contribution methodology being progressed by SESplan so that funding can be gathered towards identified infrastructure.

19. Many of the representations consider that the detail in the action programme indicates only relatively minor and insufficient improvements to the identified junctions. I can understand the concerns of local residents in this respect given the extent of housing proposed and current congestion levels. Drawing on the conclusions in Issue 19 I consider that, whilst the relevant actions should be identified in broad terms within the plan, there should be a clear requirement for further assessment taking into account all known development and cross boundary impacts so that the full extent of any necessary design improvements can be addressed.

20. Further detail is to be provided through supplementary guidance and detailed transport assessments would be required as individual sites come forward. However I consider that the required mitigation is fundamental to securing the acceptability of these proposals. In this respect, I consider that it is important that the proposed plan provides a clear indication of the transportation improvements that are required to enable the appropriate delivery of these sites.

21. In this context, I note that the main interventions are listed through reference to Table 9. However, for most of the other mitigation requirements the reader must reference the Action Programme which is not part of the proposed plan subject to this examination.

22. Whilst the action programme is a useful mechanism and can be updated annually the proposed plan, as subject to this examination, should clearly establish the principle development requirements for these sites (see also Issues 5 and 21). My recommendation to include General Development Principles for South East Edinburgh through Issue 21 brings together the various items of infrastructure that are likely to be required to mitigate the identified cumulative transport impacts. These principles also detail the need for further assessment. This ties in with the policy framework set out in revised Policy Del 1 (Issue 21) and new Policy Tra X (Issue 19). Site specific mitigation is also included in relation to each of the sites.

<u>Education Impacts General</u>

23. The action plan sets out two options for delivery of the required schools provision. The first of these is for the three sites to contribute to development of a new primary school within the boundary of the Gilmerton Station Road Site. A site for this is indicated on the site brief on page 63 of the proposed plan. McTaggart and Mickel in their submissions on Issue 14 raise concerns that there is no agreed plan for this and that feasibility studies are awaited. They consider that questions over the financial viability of

funding the proposed schooling justify an extension to the proposed site at Gilmerton Station Road (HSG24). I return to this matter in my site specific considerations below.

24. At secondary level an extension of either Gracemount or Liberton High School is required at a cost of 6.5 million pounds to be funded from the wider contribution zone. A second option is that the Gilmerton and Gracemount Primary Schools are extended and this may also require extension of Liberton and Craigour Park Primary Schools. There would also be additional requirements for non-denominational schooling.

25. Through the hearing process the council stated that "Even with education infrastructure, the costliest and most time-critical intervention, the council is assuming much of the risk and responsibility for forward and gap funding. This approach reduces the need for developments to provide major contributions upfront."

26. The council accepts that proposed housing will add to significant rising rolls and give rise to the need for additional school space. However it considers that a lead in period of at least 3 years will allow for the planned provision of the required school infrastructure. The council accepts a potentially significant funding gap between the required works and the anticipated level of developer contributions.

Conclusions on Education Impacts

27. I have no technical or expert evidence to dispute the confidence of the council, as education authority, that identified education impacts can be appropriately addressed. Consequently, I find no basis to conclude that these matters justify deletion of this site. However, this conclusion does not negate the emphasis that I consider should be placed on the appropriate and planned provision of this necessary infrastructure.

28. In this context, I consider the proposed plan lacks detail on how this constraint is to be addressed. I believe that such detail is required in order to give confidence to the local community and others that schools capacity issues will be addressed.

29. The proposed mitigation applies to various sites in South-East Edinburgh. Through issue 21 it is recommended that the various education actions for South-East Edinburgh are brought together in Part 1 Section 5 of the plan under the heading General Development Principles. My recommendations below include a cross reference to these General Development principles within the site brief for each site. It is also important that these actions and the council's approach to timeous delivery are further clarified. This will require Supplementary Guidance to provide greater surety about the mechanisms, timing and funding of delivery. These matters are addressed through the conclusions and recommendations on Issue 21 in the context of revised Policy Del 1.

Community and other facilities

30. Paragraph 72 of the proposed plan recognises the implications of the proposed plan for the provision of primary healthcare and other community health services. Policy Hou 10 on Community Facilities is relevant in this respect and states that planning permission will only be granted where there are associated proposals to provide any necessary health and other community facilities. The sites are accessible to the urban area and existing facilities. The proposed new school may have a role in this respect.

31. I note that Paragraph 130 of the Plan states that developer contributions may apply

to actions in addition to those identified in the Action Programme. Discussions are on-going between the council and NHS Lothian to assess the need for new and expanded general practitioner practices to accommodate the planned housing growth set out in the Second Proposed Plan. However, no specific actions have been included at this time and this matter is not referenced in the development principles.

32. Our conclusions on Issues 5 and 21 recognise the importance of the appropriate provision of community facilities such as health. Additional text is recommended for inclusion in Part 2 section 1 of the plan to explain the lack of current evidence on this matter and to clarify that the current policy on developer contributions is focussed on transport, education and green space requirements. A clear approach will be required if the objective of Policy HOU 10 is to be realised but this may fall outwith the direct remit of the planning system. There is currently insufficient information/justification to include reference to required developer contributions towards the wider provision of other community facilities including health on these sites.

Loss of Agricultural Land

33. Extension of urban areas will inevitably encroach on agricultural land. Scottish Planning Policy (paragraph 80) seeks to protect prime quality farm land but recognises that loss of this land may be justified as a component of the settlement strategy. I do not consider that deletion of these sites would be justified as I consider that this land is required as an essential component of the settlement strategy.

Nature conservation impacts

34. Two of these sites are in agricultural use and do not present a particularly unusual or diverse habitat and I have no information to suggest they are of particular biodiversity value. The scrub woodland of the Drum(HSG25) is likely to support more biodiversity but I am satisfied this site is not identified as one of local importance. Policy Env 16 applies the relevant protection to species protected under European and UK law.

35. One of the objectives of the Strategic Environmental Assessment is to 'Protect and enhance biodiversity, flora and fauna, and habitat networks'. The Strategic Environmental Assessment's findings are available in the Environmental Report. Volume 1 page 34 sets out the method of assessment, which uses the maps in Volume 2 (page 3). The relevant findings are set out in Volume 1 where the conclusion is that these allocations do not have a significant harmful effect on biodiversity, flora or fauna. I find no evidence to the contrary.

36. Drawing on the above my conclusion is that the allocation of these sites would not result in any significant adverse effect on nature conservation interests.

Drainage and Flooding

37. Policy Env21 on flood protection states that planning permission will not be granted on sites that would increase the risk of flooding or be at risk from flooding or where sites are in areas of importance for flood management or where prejudicial to existing or planned flood defences.

38. Whilst policy Env21 provides for flood protection, Scottish Planning Policy through paragraphs 260-263 highlights the role of development plans in addressing flood risk

including water-course flooding and surface water. There is no suggestion from the available evidence that these sites are at any identified risk from flooding, surface water of other drainage issues which cannot be addressed at the detailed planning stage. These sites are not identified in representations from the Scottish Environment Protection Agency as at risk of fluvial or surface water flooding.

Density

39. As referenced above the density is indicative and will be subject to detailed layout and design considerations. This should ensure a layout and design which responds to the particular characteristics of the site. Policies in part 2 section 2 of the plan require development to relate sensitively to the existing quality and character of the local and wider environment.

Air Quality,Pollution and Climate Change

40. Housing on these sites and the associated transport movements will undoubtedly have impacts on air quality and pollution in an area already associated with traffic congestion. However, as stated above, I find no reason to conclude that the assessed traffic impacts would be unacceptable. Public transport accessibility will be key to minimising the pollution impacts of increased traffic. I understand that Air Quality Management Areas are in place with Council action plans setting out measures to help reduce vehicle emissions within these areas. The Council's Local Transport Strategy (2014-2019) identifies a range of actions and policies to reduce emissions and improve air quality standards across the city. For these reasons, whilst I agree that these impacts are potentially significant, I consider there is scope for appropriate mitigation. Subject to the stated transport mitigation, to be detailed in the general and site specific development principles, I am not persuaded that these concerns justify deletion of these sites.

Undermining and Ground Stability

41. A number of representations reference past mining activity and issues with ground stability. I note this is not an uncommon issue in this area and it is also raised in relation to the site at Edmonstone and Brunstane as considered elsewhere in this report. Site investigations would form part of any planning application where any ground hazards would be identified and mitigation measures addressed. There is nothing to suggest that the matters raised are insurmountable to an extent that cannot be addressed by appropriate mitigation.

Policy Assessment

42. I note that a number of representations assess the sites against relevant policies in the plan. Any subsequent planning applications on these sites fall to be assessed against all the relevant policies. In this context two of these sites have already progressed through the planning application process. Drawing on my conclusions above and my assessment of the remaining matters on each site I find nothing sufficient at this stage in the policy framework on design, the environment, transport or infrastructure to indicate that the impacts of these housing sites could not be addressed through appropriate mitigation.

Site Specific Issues HSG23: Gilmerton Dykes Road

43. I understand that this site is subject to a current planning appeal (PPA-230-2151) where a notice of intention to grant planning permission has been issued. I have considered the matters raised in representations to the site as included in the proposed plan below although I accept that circumstances may have overtaken my consideration of the principle of development on this site. I have taken account of all of the submissions including the supporting design and access statement lodged by Land Options East/Miller Homes and my observations on site.

44. I consider the site has a sense of enclosure due to existing boundary features. These include remnant policy woodland along Gilmerton Dykes Road and planting along the rear of housing on Gilmerton Place. There is less substantial planting along the south and south-eastern boundaries. It is a relatively small site and its setting would enable integration with the housing on Gilmerton Place and along Gilmerton Dykes Road. The proposal would enable the boundaries to the south and south east to be strengthened to re-enforce and reflect the existing policy woodland. I note that this is referenced in the site brief with a corresponding requirement for a 20 metre tree belt to the south and a 30 metre tree belt to the south east. This is mainly justified in order to achieve a robust long term green belt boundary.

45. My conclusions below consider the extension of HSG 24. In addition, further development potential, on a site referenced as Lasswade Road, is considered through Issue 14. Considering all of this in the round I find that an integrated landscape framework would be required to secure integration with the urban area and to avoid creating unnecessary barriers to future connection between sites. This would then be contained within the new green belt boundary as recommended through Issue 14. Consequently my recommendation removes reference to the establishment of green belt boundaries or the width of associated tree belts in relation to this site.

46. As explained above I consider that the principle of green belt release in South East Edinburgh is established through SESplan. An approach that relied on brownfield sites would not be sufficient. However, I appreciate local concerns about this loss of green belt and that this open setting is locally valued. However, when considered on its own it is relatively small site with a sense of containment where integration with the urban area could be achieved. I do not consider development of this site would have a significant impact on the landscape setting and identity of the city. It is a fenced off field so has little recreational value although it does have amenity value particularly to adjacent housing.

47. As part of the wider development and release of green belt around Gilmerton there would be a more significant impact. These south facing slopes do have a role in providing a setting on this urban edge and creating clear distinction between urban and rural. However with careful layout, design and landscaping I do not consider that development here would significantly compromise green belt objectives or result in an unacceptable extension to the urban area. The area is relatively close to Midlothian but the green belt would in my view still enable adequate separation between settlements. Consequently, I do not consider that loss of this site would significantly compromise green belt objectives.

48. On the issue of transport I draw on my findings above. Access is proposed from Gilmerton Dykes Road to the north west of the site. I note the representations requesting that the proposed access for this and other sites should be included on the site brief

diagram. However I consider it is important to retain some flexibility given that most of the details of layout, access and design will not be addressed until the detailed planning stage. I consider it would be inappropriate to show a location until the configuration and location of the access is confirmed through detailed assessment.

49. In addition to a shared contribution to reconfiguration of the Gilmerton Road/Drum Street junction an associated access and parking strategy for Drum Street is proposed to alleviate congestion caused by parked cars close to the junction. Site specific actions include:

• Cycle link – Gilmerton Road to Laswade Road
• Upgrade bus stops on Laswade Rd/Gilmerton Rd
• Enhance peak period bus capacity on Gilmerton Road
• New footway along Gilmerton Dykes Road.

50. I appreciate that the configuration of the local roads will draw increased traffic through a residential area and onto Newtoft Street. On my site visit I noted that on street car parking and relatively narrow streets may exacerbate current problems. However this is a relatively small addition of 50-70 houses in an accessible location. I have no reason to conclude that the identified localised transport impacts cannot be sufficiently addressed through the planning application process. However to reflect these matters I have added a development principle to the site brief to address any identified impacts on the safe operation of the local road network. I note that there is no reference to Transport Scotland's concerns as part of the assessment of the appeal. This was not a matter brought to the attention of the reporter at that time. Nevertheless the site is placed within the policy context of the plan including the revisions recommended through Issues 19 and 21 and the General Development Principles for South- East Edinburgh. This is consistent with the other sites in the Gilmerton area.

51. While I recognise the legitimate concerns of the local community, these need to be balanced against the serious shortage of land capable of delivering housing in the shorter term to meet the required housing target. Careful layout and design should avoid any issues relating to unacceptable privacy or loss of amenity to neighbouring residents. Detailed matters of access will also require careful consideration. These matters should be addressed through any detailed planning application assessed in the context of the council's policies including on design, transport and infrastructure delivery. Subject to the required mitigation to be assessed within the policy context of the plan I find no reason to conclude this site should be deleted.

Site Specific Issues HSG24 Gilmerton Station Road

52. There has been a recent outline planning permission granted on this site which effectively establishes the principle of this development. Detailed community and other concerns were addressed through that process as set out in the report on the appeal referenced PPA-230-2137 including impact on the green belt and on infrastructure provision.

53. Whilst circumstances have overtaken my detailed consideration of the principle of development on this site my site visit confirmed that its landscape impacts would be of a mainly localised nature. The site is not widely visible as part of the setting of the city or in views to its key landmarks. However the area provides a clear distinction between the urban edge and the countryside in an area where the green belt is relatively narrow. The

site is obviously locally valued and provides a rural context for Gilmerton where development currently follows a distinct ridge. The extension to the site area shown in the proposed plan shifts the boundary to the west. This increases the capacity and site area as referenced in Issue 14 to 36.7 hectares with a consequent increase of circa 160 houses.

54. The council's western green belt boundary as shown in the proposed plan did not follow any robust feature on the ground. I find no reason to prefer this over that indicated for the larger site area as now approved at appeal. In any event my conclusions in Issue 14 accept the case for some further revision to the green belt in this area. In this context the western boundary is more relevant in terms of securing an appropriate landscape framework and enabling integration for the area as a whole. The council's submissions to my May further information request accept this. For all these reasons, taking into account the requirement to find additional housing land within this Strategic Development Area, I consider incursion into the green belt to accommodate the larger site as referenced through Issue 14 is justified and that consideration of the wider area and a long term boundary requires a consequent change to the development principles which require a 50 metre wide tree belt on the western boundary of the site as extended.

55. My findings are that the conservation area will be further from the countryside and there would be some alteration to its established setting. However, due to intervening landform and more recent development at Limefield and Ravenscroft Gardens and to the south of Gilmerton Dykes Road, I do not consider the proposed development would impact on the character and appearance of the conservation area.

56. The submissions reference road access from two points on Gilmerton Station Road and one on Drum Street. I note the representations requesting that the proposed access for this and other sites should be included on the site brief diagram. However I consider it is important to retain some flexibility given that most of the details of layout, access and design will not be addressed until the detailed planning stage.

57. I have considered the various concerns raised about transport issues above. In this context I note that the appeal intention notice references financial contributions to transport improvements including: reconfiguration of Gilmerton Crossroads with an access and parking strategy for Drum Street to alleviate congestion caused by parked cars close to the junction; Gilmerton Road/ Drum Street junction capacity upgrade; Drum Street cycle pedestrian crossing and a connecting cycle pedestrian path through the site to link to the multi-user path to Straiton; a traffic order for a lower speed limit on Gilmerton Station Road; upgrading bus stops and peak capacity on Gilmerton Road; safeguarding land along the Gilmerton Road frontage for a potential bus priority scheme; a new footway along Gilmerton Station Road; pedestrian crossing facilities on Gilmerton Road; redetermination of footways, verges and carriageways as required to form the access to the development; and an order to control disabled parking places if necessary.

58. Given my conclusions above I find no reason to conclude that these provisions, as supported by the council's transport officials, would be insufficient. My recommendations add a bullet point to the development principles to place emphasis on the need to address any identified impacts on the safe operation of the local road network

59. I note that there is no reference to Transport Scotland's concerns as part of the assessment of the appeal. This was not a matter brought to the attention of the reporter at that time so is not referenced in the extant outline planning permission. Nevertheless

based on the issues raised in representation through this examination, I find that reference to this matter should be included in the development principles. This also ensures consistency with the other sites in the Gilmerton area.

60. My conclusions above reference the need for all schools within the cumulative contribution zone to contribute to address education provision. As explained the council has indicated alternative options and no firm conclusion has been reached on this. I see that the planning obligation for this site has addressed this uncertainty by including flexibility for the council to decide whether to construct a new non-denominational primary school on serviced land to be provided within the site, or to apply the developers' financial contribution towards the provision of primary school places elsewhere.

61. I consider that whilst this obligation fulfils the requirements to address the education impact of this site it serves to illustrate some of the uncertainty around when the new school would be delivered and/or how the required extensions to other schools to meet the cumulative impacts of development in the area would be addressed. I find this provides further justification to ensure that a consistent approach is applied within the plan and to provide the required hook for supplementary guidance to address the more detailed matters of delivery and any consequent issues relating to gap and forward funding. This reflects my conclusions on Issue 5 and 21.

62. While I recognise the legitimate concerns of the local community, these need to be balanced against the serious shortage of land capable of delivering housing in the shorter term to meet the required housing target. Careful layout and design should avoid any issues relating to unacceptable privacy or loss of amenity to neighbouring residents. These matters should be addressed through any detailed planning application assessed in the context of the plan's policies on design, environment, transport and infrastructure provision.

63. In response to my further information request 11 the council has agreed that the site as approved should be added to Table 4 with a consequent change to the proposals map, Figure 14 over-view map and the Gilmerton site brief (Gilmerton Station Road (HSG 24)). I consider that in the interests of clarity and consistency the plan should reflect the up to date position. This reflects my conclusion on other sites relevant to representations which have been granted planning permission or are subject to current notices of intention to grant planning permission. On this site the council has provided the relevant changes which reflect the extant planning permission. Wider transport and education impacts relating to this and other sites are addressed through the General Development Principles. (see Issue 21).

Site Specific Issues HSG28 The Drum

64. The Drum is of national importance as a site on the Inventory of Gardens and Designed Landscapes in Scotland and as the setting to a category A Listed Building. My conclusions on this site draw on the advice of Historic Scotland as set out in its letter of 12 June 2012.

65. This site is enclosed in the far south-western corner of the estate policies adjacent to the residential area accessed from the A772 at Candlemaker's Park. Approximately two thirds of the site is included within the boundary of the of the designed landscape. It encompasses an area of scrub woodland on the ridgeline to the north and an open area of grassland enclosed by woodland planting to the south. I agree that the wooded

boundary between the site and the rest of the designed landscape could be enhanced to achieve a more robust woodland setting on this edge.

66. Given the raised nature of the site due to previous landfilling I agree with Historic Scotland and the council that housing development could be accommodated without a significant adverse impact on the character of the designed landscape. The raised nature of the site contributes to a general loss of its original character relative to other parts of the designed landscape. I consider the proposal could achieve an enhanced woodland setting. This mitigation is addressed by the requirement to provide a new tree belt of 30 metres depth to the north and east of the site to form a new boundary to the green belt and The Drum. There is housing and a hotel prior to the access to Candlemakers Park on the approach from the east and the site is set in behind this existing development. The site is well contained by its setting and is not widely visible in the context of the setting of the city and its key landmarks. The site is fenced off and has no obvious existing recreational role. I consider the site can be developed without compromise to green belt objectives.

67. I consider that any concerns about contamination due to past landfilling could be addressed through an appropriate ground condition survey and associated remediation at the detailed planning stage. Remediation would also be required if survey work indicated instability due to past mining activity. There is nothing at this stage to demonstrate these issues would be insurmountable.

68. Access is likely to be taken from Candlemakers Park to the south west of the site. I note local concerns particularly given the extent of housing to be served by this single access. The proposed capacity of the site is up to 175 houses in combination with access to the existing residential area. I appreciate that an alternative access would offer better compliance with best practice. However, I consider that the main issue would be the configuration of the access on the short stretch of Candlemakers Park onto Drum Street. The current road layout and the space available indicates to me that there is scope to address the detail of a safe and appropriate access to the site at the detailed planning stage. I note the representations requesting that the proposed access for this and other sites should be included on the site brief diagram. However I consider it is important to retain some flexibility given that most of the details of layout, access and design will not be addressed until the detailed planning stage. I consider it would be inappropriate to show a location until the configuration and location of the access is confirmed through detailed assessment.

69. In addition to a shared contribution to reconfiguration of the Gilmerton Road/Drum Street junction and an associated access and parking strategy for Drum Street as referenced above site specific actions include:

- Cycle link – Gilmerton Road to Laswade Road
- Cycle link - Drum Street to SE Wedge Parkland
- Upgrade bus stops and enhance peak capacity on Gilmerton Road

70. There are a number of concerns about linking the site via a cycleway through the residential area to the north to the South East Wedge Parkland. Whilst there may be legal issues about securing this link these fall outwith the remit of the planning system. It is a desirable planning objective to promote connections, particularly cycle and pedestrian links between new development and the established urban area. I am not persuaded that these benefits would be outweighed by concerns about consequent disturbance and

other nuisance.

71. I appreciate that the proposal will draw increased traffic and that there are concerns about appropriate access arrangements. However subject to further detailed consideration through the development management process I find no reason to conclude that the identified localised transport impacts cannot be sufficiently addressed. I have recommended an additional development principle to secure an improved and appropriate access/junction from the site onto Drum Street and to address any identified impacts on the safe operation of the local road network. I have addressed matters relating to the cumulative transport and education issues arising from this site in combination with others in the area in my conclusions above.

72. I recognise the concerns of the local community but these need to be balanced against the serious shortage of land capable of delivering housing in the shorter term to meet the required housing target. Subject to clarity about the required mitigation I find no reason to conclude this site should be deleted. Careful layout and design should avoid any issues relating to unacceptable privacy or loss of amenity to neighbouring residents. These matters should be addressed through any detailed planning application assessed in the context of the council's policies on design, the environment, transport and infrastructure provision.

Overall Conclusion

73. My recommendations here and elsewhere in this report reflect the need to insure that the plan provides more clarity on the required infrastructure provision and other mitigation. This is addressed for South East Edinburgh including Gilmerton through the proposed inclusion of General Development Principles on transport and education along with an expanded policy on developer contributions (DEL 1 Issue 21) supported through Supplementary Guidance and a new Policy Trans X (Issue 19). Other mitigation is addressed through the site specific development principles below and as already included in the plan. The action programme will then provide the means to monitor and manage progress towards timeous delivery of the required mitigation.

74. I understand that these proposals have caused significant local concern. However, there is a requirement for housing land that cannot be fully addressed on brownfield sites. My conclusion drawing on all of the above is that, subject to the required mitigation, these sites should be retained for housing.

Reporter's recommendations:

Modify the proposed plan as follows:

Gilmerton Dykes Road HSG 23

1. Delete the second bullet point of the development principles on tree belts and replace with

- Appropriate boundary treatment and landscaping retaining scope for integration with the wider area and for potential pedestrian / cycle connections to potential future adjacent housing areas.

2. Amend development principles to include:

- Address the General Development Principles on transport and education for South-East Edinburgh (as set out in paragraphs 118-120).
- Address any identified impacts on the safe operation of the local road network
- Make appropriate provision for a cycle link from Gilmerton Road to Laswade Road
- Upgrade bus stops on Laswade Road/Gilmerton Road
- Enable enhanced peak period bus capacity on Gilmerton Road
- Make provision for a new footway along Gilmerton Dykes Road.

<u>North of Gilmerton Station Road HSG24</u>

3. Amend Table 4 New Housing Proposals to read as follows:

Proposal	Comments
Reference: HSG 24 Name: Gilmerton Station Road Site area: **36.5** hectares Estimated number of houses: **600 – 650**	Proposals for housing-led development on land to the north of Gilmerton Station Road as detailed in the Gilmerton Site Brief

4. Amend the Proposals Map to identify the site approved through planning appeal decision PPA-230-2137 which extends the site to 36.5 hectares on the Proposals Map.

5. Amend Figure 14 South East Edinburgh Overview Map to enlarge the Gilmerton Station Road site accordingly

6. Amend the Gilmerton Site Brief diagram on page 63 as shown in Appendix B of the council's response to Further Information Request 11.

7. Amend the text for Gilmerton Station Road (HSG 24) – Development Principles to read as follows:

- address the General Development Principles on transport and education for South-East Edinburgh (as set out in paragraphs 118-120).
- address any identified impacts on the safe operation of the local road network
- opportunity to change character of Gilmerton Station Rd, through street design incorporating trees and verges and addressed by new residential development.
- provide green network connections linking the site with existing local paths to the north and east.
- provision of a new multi-user path link from Gilmerton Dykes Rd to Gilmerton Station Rd (to connect to the transport safeguard along disused Edinburgh,

Loanhead and Roslin branch line).

- create path connection to proposal site HSG23
- provision of new 2ha public park in accordance with open space strategy standards
- connect existing woodland habitat to north and south of site using street trees and design of new park
- Appropriate boundary treatment to south-west, retaining scope for potential pedestrian/cycle connections and to allow integration with potential development in the future.
- existing industrial/employment land to south east of site could provide additional housing in longer term, subject to enhancement of existing wooded boundary.

8. Amend the text for The Drum HSG 25 – Development Principles to read as follows:

- Address the General Development Principles on transport and education for South-East Edinburgh (as set out in paragraphs 118-120).
- Address appropriate and safe access from the site onto Drum Street
- Address any identified impacts on the safe operation of the local road network
- Provide Cycle link – Gilmerton Road to Laswade Road and from Drum Street to the SE Wedge Parkland
- Upgrade bus stops and enhance peak capacity on Gilmerton Road

Issue 9 Appendix A – HSG 23 Gilmerton Dykes Road	
0654 Karen Moore 0747 Gavin Gilchrist 1140 Diana Cairns 1449 Callum Grigor 1451 Gemma Robertson 1455 Fiona Duncan 2031 John Stewart 2035 Janet McNab 2080 Susan Gill 2154 Keith Gill 2382 Lillian Gibson 2383 Darren Gibson 2547 James Flood 2568 Stephen Hawkins 2593 Diana Flood	

Issue 9 Appendix B – HSG 24 Gilmerton Station Road

0097	Maureen Watson
0240	William Hunter
0413	Susan Macdonald
0433	Brian Chrystal
0463	Ana Duarte
0508	Morag Fowlie
0543	Robert Taylor
0554	Eddie Philp
0556	Suzanne Lowe
0573	Hilary Stokes
0576	Eric Sykes
0577	D Leitch
0609	Ross Birnie
0640	Duncan Crookston
0642	Christine Crookston
0686	George Kenny
0687	Sheila Kenny
0690	Joao Lima
0715	Patricia Meaney
0729	Anthony Randell
0737	Young Graham
0789	S Rogers
0936	Mr & Mrs David Young
0964	L Hunter
0994	Mary Gibson
0998	Catherine Paxton
1004	Ruth Addinall
1052	Laura Pennett
1140	Diana Cairns
1175	Annie Watson
1222	Melody Jo Robertson
1223	Lorraine C Fagan
1290	R G Charles
1306	Gwen Tarbet
1444	Jill and Ken Raby
1445	E J Hannay
1446	David and Jill Rafferty
1453	Michael Baillie
2031	John Stewart
2035	Janet McNab
2052	Margaret S Gibson
2053	James Gibson
2054	John J Gibson-Eaglesham
2055	Lesley J Gibson-Eaglesham
2056	David Eaglesham
2080	Susan Gill
2154	Keith Gill
2236	David Pratt
2303	Stefan Kruk
2304	Gabriela Kruk
2344	Caroline Mulvenna
2367	Janet Dawson Mowels
2548	Euphemia Paxton
2556	Timothy Hunter
2557	Andrew Wilkie
2568	Stephen Hawkins
2721	David Young

Issue 9 Appendix C – HSG 25 The Drum	
0239 Carole Hunter 0240 William Hunter 0550 David Bain 0608 Mathieson Birnie 0729 Anthony Randell 0731 WJM Hunter 1140 Diana Cairns 1442 Hogg 2031 John Stewart 2035 Janet McNab 2052 Margaret S Gibson 2053 James Gibson 2054 John J Gibson-Eaglesham 2055 Lesley J Gibson-Eaglesham 2073 David Eaglesham 2080 Susan Gill 2154 Keith Gill 2396 Tom Neville 2568 Stephen Hawkins 2616 K Gunda 2622 Toni Lizier 2624 H Evans 2625 Luciano Lizier 2712 Keith Scotland	

Issue 10	**New Greenfield Housing Proposals – SE Edinburgh SDA (3)**	
Development plan reference:	**HSG 26 Newcraighall North** **HSG 27 Newcraighall East** **HSG 29 Brunstane** **SCH 9 Brunstane** **Part 1 Section 3 Table 4 pages 25 – 27** **Site Brief pages 64 – 65**	**Reporter:** Lance Guilford

Body or person(s) submitting a representation raising the issue (including reference number):

412 individuals seeking removal of HSG 29 Brunstane (see Issue 10 Appendix A)

Organisations, elected representatives and individuals other than those in Issue 10 Appendix A:

0086 D & A Woodburn
0147 Martin Stobbart
0195 T Proudfoot
0223 Dalrymple Trust
0322 Adrian & Roxane Laird Craig
0378 Barry Turner
0388 Pauline Cowan
0711 Brunstane Group
0828 Network Rail
0941 Gilberstoun Residents Association
1022 Musselburgh Conservation Society
1139 Bridget Wilson (supported by petition signed by 133 people)
1144 Geoffrey Brocklehurst
1161 EDI Group
1394 Joppa Residents Association
1407 Craigmillar First
1412 Craigmillar Labour
1414 Niddrie Independent Parents Support (NIPS)
1504 Portobello Amenity Society
2086 Persimmon Homes (East Scotland)
2088 Scottish Government
2096 Historic Scotland
2111 Architectural Heritage Society of Scotland
2117 Brunstane Residents Group
2126 Cockburn Association
2164 Chris Hewitt
2181 Raymond Faccenda
2182 Frances Faccenda
2315 Joyce Smith
2353 Garden History Society in Scotland
2406 David Walker
2414 Newcraighall & Brunstane Planning Group
2457 Jacqueline Ritchie
2535 IB Hansen
2553 The National Trust for Scotland
2609 Charles Wood
2628 Newcraighall Heritage & Residents Association
2660 Kezia Dugdale MSP
2673 Sheila Gilmore MP
2697 Scottish Natural Heritage
2699 Scottish Environment Protection Agency
2701 Portobello Heritage Trust
2704 Portobello Community Council
2711 Regius School

Provision of the development plan to which the issue relates:	These provisions of the Plan deal with the proposals for new housing allocations (HSG 26 Newcraighall North, HSG 27 Newcraighall East and HSG 29 Brunstane) and school proposal SCH 9 Brunstane in South East Edinburgh.

Planning authority's summary of the representation(s):

CONTEXT

The Main Issues Report consulted on the housing site options in South East Edinburgh,

see question three, page 16:

- HSG 26 Newcraighall North was presented as one of the preferred options;
- HSG 27 Newcraighall East was presented as one of the preferred options.

Both sites were included in the first Proposed Plan and received representations both objecting to their inclusion and supporting their inclusion as housing proposals. These housing proposals are retained in the Second Proposed Plan.

'Brunstane Farmland' was presented in the Main Issues Report as an 'Other Option'. Brunstane was not included as a housing proposal in the first Proposed Plan.

Representations opposed to HSG 26 Newcraighall North in current form and seeking its removal and/or change

- Suggests removal of the site on the grounds of green belt, transport infrastructure, school infrastructure, community facilities and coallescence. **(0147 Martin Stobbart; 2457 Jacqueline Ritchie)**
- Suggests that the number of houses proposed for HSG 26 should be reduced from 210 to the 160 for which permission has already been granted. Objects on the grounds of the size of the development, which combined with Newcraighall East will destroy the character of Newcraighall and impact on traffic. **(1504 Portobello Amenity Society)**
- The proposed site is located within a functional flood plain or an area of known flood risk. Request that the comments in Table 4 and the Development Principles for Newcraighall North on page 64 in the Site Brief relating to Housing Proposal HSG 26 are amended to include the following: 'The finalised site capacity, design and layout should be informed by an adequate flood risk assessment'. **(2699 Scottish Environment Protection Agency)**

Representations seeking removal of HSG 27 Newcraighall East

Seek removal of HSG 27 on the grounds of one or more of the reasons listed below:

- **Site Selection** – The land is agricultural land and green belt. Housing development on this area will have a negative impact on the wider landscape setting of both Edinburgh and Musselburgh and will result in coalescence between the two settlements.
- **Transport Infrastructure** – There is poor public transport links. The development of further houses will completely gridlock the roads, creating dangerous levels of pollution for residents, as well as children attending the local primary school.
- **Biodiversity and Natural Habitat** – Further housing in the area will have a negative impact on biodiversity and natural habitat in the area.

(0086 D & A Woodburn; 0147 Martin Stobbart; 0378 Barry Turner; 2181 Raymond Faccenda; 2182 Frances Faccenda; 0195 T Proudfoot; 2164 Chris Hewitt; 2457 Jacqueline Ritchie; 2628 Newcraighall Heritage & Residents Association; 2535 IB Hansen; 2711 Regius School)

Representations supporting HSG 27 Newcraighall East

- Supports the allocation of HSG 27 for residential development. Confirms that the site is wholly effective and would be happy to work with adjoining landowner to

ensure site is delivered in a co-ordinated, efficient and timeous manner. **(0223 Dalrymple Trust)**

Representations opposed to HSG 27 Newcraighall East in current form and seeking its removal and/or change

- Requests that only the western part of the site be developed. Objects on the grounds of coalescence and loss of green belt. **(0378 Barry Turner)**
- Amend the housing allocation from 385 to 176 dwellings. Objects on the grounds of the size of the development, which combined with the Newcraighall North site, will destroy the character of Newcraighall and impact upon traffic. **(1504 Portobello Amenity Society)**
- Suggests improvements to crossings and junction. **(2164 Chris Hewitt; 2628 Newcraighall Heritage & Residents Association)**
- The proposed site is located within a functional flood plain or an area of known flood risk. Amend Table 4 and the Newcraighall East Site Brief to include the following text 'The finalised site capacity, design and layout should be informed by an adequate flood risk assessment'. **(2699 Scottish Environment Protection Agency)**
- Add a new principle to the site brief for HSG 27 to maintain green belt policy and to prevent coalescence between settlements – 'create new woodland along the southern and eastern boundaries to maintain the perception of separation between Edinburgh and Musselburgh'. **(2126 Cockburn Association)**

Representations seeking removal of HSG 29 Brunstane

Seek removal of HSG 29 on the grounds of one or more of the reasons listed below:

- **Site Selection** – HSG 29 Brunstane is not identified in the SDP as a locational priority for development or one of the four Strategic Development Areas. The land is agricultural and is the only remaining green belt between Edinburgh and East Lothian. Housing development on this area will have a negative impact on the wider landscape setting of both Edinburgh and Musselburgh and will result in coalescence between the two settlements.
- **Transport Infrastructure** – There are no existing public transport links to the land at Brunstane and creating such links will be hugely expensive. The site is described as being landlocked. Creating such transport links would involve building roads across the John Muir Way. Consider that the estimated increases in traffic flow fails to take into consideration the cross-boundary transport implications on Newcraighall Village as a result of development taking place in East Lothian and Midlothian.
- **Biodiversity and Natural Habitat** – The land at Brunstane Farm was identified in 2002 as a proposed biodiversity area, a reservoir for some of the 97 priority Scottish wildflowers and 12 key habitats currently threatened with extinction.
- **Air Quality and Pollution** – The development of a further 1300 houses will completely gridlock the roads, creating dangerous levels of pollution for residents, as well as children attending the local primary school.
- **Ground Conditions** – The site is a high risk area for coal mining
- **Cultural Heritage** – Building on Brunstane site would significantly impact on the setting of the Category A listed Brunstane House and potentially impact on the setting of Newhailes House and its Inventory Designed Landscape. Development of this site would also impact on an area of significant archaeological importance, and the character and heritage of Newcraighall village.

- **Land Ownership** – Brunstane Farmland is owned by EDI Ltd (a wholly-owned subsidiary of Edinburgh Council). Considers that this creates a serious conflict of interest, which renders the Council unable lawfully to adopt this part of the Plan.

(0711 Brunstane Group; 0941 Gilberstoun Residents Association; 1022 Musselburgh Conservation Society; 1139 Bridget Wilson (supported by petition signed by 133 people); 1394 Joppa Residents Association; 1407 Craigmillar First; 1412 Craigmillar Labour; 1414 Niddrie Independent Parents Support (NIPS); 1504 Portobello Amenity Society; 2086 Persimmon Homes (East Scotland); 2096 Historic Scotland; 2111 Architectural Heritage Society of Scotland; 2117 Brunstane Residents Group; 2126 Cockburn Association; 2406 David Walker; 2414 Newcraighall & Brunstane Planning Group; 2553 The National Trust for Scotland; 2628 Newcraighall Heritage & Residents Association; 2660 Kezia Dugdale MSP; 2673 Sheila Gilmore MP; 2701 Portobello Heritage Trust; 2704 Portobello Community Council; 2711 Regius School; 412 individuals listed in Issue 10 Appendix A)

<u>Representations opposed to HSG 29 Brunstane in current form and seeking its removal and/or change</u>

- Considers that the housing allocation is too large, putting pressure on utilities, including roads, sewage and drainage. Suggests removing the part of the site which is located to the east of the railway line. Considers that the exclusion of the development east of the railway would maintain the environmental integrity of the Newhailes land. **(0322 Adrian & Roxane Laird Craig)**
- Suggests amending Brunstane Development Brief to make clear that the vehicular crossing over the railway line will not be at grade. The safety, reliability and efficiency of the rail infrastructure are of paramount importance to Network Rail. The site brief needs to be made clearer that a new level crossing will not be permitted. **(0828 Network Rail)**
- Suggests increasing the amount of open space allocated within the development, with specific reference to the area adjacent to the National Trust for Scotland property (Newhailes), in particular the Stable block and administration areas. **(1144 Geoffrey Brocklehurst)**
- Given the potential scale of development at Brunstane, and its proximity to the A720, particularly the Old Craighall Junction, it is considered that the associated trips generated will impact upon the trunk road network at this location. The cross cumulative impact of development from adjoining planning authority areas has not been considered within the Transport Appraisal. Suggests including a bullet point under the Brunstane Development Principles on page 64 which states 'Site may require to contribute to potential mitigation measures at the A1/A720 Old Craighall roundabout if identified through an appropriate cumulative appraisal taking into consideration cross boundary effects'. **(2088 Scottish Government)**
- Objects on the grounds of coalescence with Musselburgh in landscape terms. If development were to be allowed more needs to be prescribed to minimise the impression of coalescence. Seeks a change to the Brunstane Development Principles to include the creation of new woodland along the eastern and southern boundaries to strengthen Newhailes policy woodlands and create perception of separation between Edinburgh and Musselburgh. **(2126 Cockburn Association)**
- The proposals need to be improved, with greater consideration for traffic, congestion and pollution. Objects on the grounds that existing road infrastructure is unsuitable, increase in traffic congestion, impact on quality of life and impact on the

environment. **(2315 Joyce Smith)**

- Objects to HSG 29 on the grounds of impact to Newhailes designed landscape. Development will clearly have a detrimental impact on its character and value. Suggests that any development at this location should be restricted to the western area of the site and a substantial buffer zone of tree planting is established between Newhailes and the new development. **(2353 Garden History Society in Scotland)**
- Remove the proposal from the Plan or significantly reduce size of development. Objects on the grounds of loss of greenbelt land, inappropriate scale of development and increased congestion. **(2609 Charles Wood)**
- No specific modifications suggested. Consider this to be a challenging site due to the inter-related cultural and landscape sensitivities. Recommends that the site requirements clearly establish the following: the need for high quality boundary treatment adjacent to John Muir Way corridor, Brunstane House and Newhailes Garden and Designed Landscape; green corridors to provide multiple functions including cycling and walking; and green spaces, corridors and paths should respond to their context. The relationship to allocations within East Lothian should be a key determining factor. **(2697 Scottish Natural Heritage)**
- The proposed site is located within a functional flood plain or an area of known flood risk Table 4 and the Brunstane Site Brief should be amended to include the following 'The finalised site capacity, design and layout should be informed by an adequate flood risk assessment'. Table 4 and the Brunstane Site Brief should be amended to include the following 'Enhanced SUDS will be required to address current/future water quality pressures and to ensure no detrimental impacts to the recently designated bathing waters at Fishers Row'. **(2699 Scottish Environment Protection Agency)**
- Supports the allocation of HSG 29, but seeks amendment to the site brief to add two 'blue arrows' to indicate clearly that there are three vehicular access points. **(1161 EDI Group)**

<u>Representations opposed to SCH 9 Brunstane in current form and seeking its removal and/or change</u>

- Table 5 and the Brunstane Site Brief should be amended to include 'Enhanced SUDS will be required to address current/future water quality pressures and to ensure no detrimental impacts to the recently designated bathing waters at Fishers Row'. **(2699 Scottish Environment Protection Agency)**
- Objects to the proposed primary school (SCH 9 Brunstane) alongside an objection to HSG 29 on the grounds of loss of green belt. Considers that the proposed primary school (SCH 9 Brunstane) is better located at Newcraighall North or East. Remove proposal from the Plan. **(0388 Pauline Cowan)**

Modifications sought by those submitting representations:

<u>Representations opposed to HSG 26 Newcraighall North in current form and seeking its removal and/or change</u>

- Remove proposal from the Plan. **(2457 Jacqueline Ritchie; 0147 Martin Stobbart)**
- Suggests that the number of houses proposed for HSG 26 should be reduced from 210 to the 160 for which permission has already been granted. **(1504 Portobello Amenity Society)**
- Request that the comments in Table 4 and the Development Principles for

Newcraighall North on page 64 in the Site Brief relating to Housing Proposal HSG 26 are amended to include the following: 'The finalised site capacity, design and layout should be informed by an adequate flood risk assessment'. **(2699 Scottish Environment Protection Agency)**

Representations seeking removal of HSG 27 Newcraighall East

Remove proposal from the Plan. **(0086 D & A Woodburn; 0147 Martin Stobbart; 0378 Barry Turner; 0195 T Proudfoot 2457 Jacqueline Ritchie; 2181 Raymond Faccenda; 2182 Frances Faccenda; 2164 Chris Hewitt; 2628 Newcraighall Heritage & Residents Association; 2535 IB Hansen; 2711 Regius School)**

Representations opposed to HSG 27 Newcraighall East in current form and seeking its removal and/or change

- Requests that only the western part of the site be developed. **(0378 Barry Turner)**
- Amend the housing allocation from 385 to 176 dwellings. **(1504 Portobello Amenity Society)**
- Suggests improvements to crossings and junction. **(2164 Chris Hewitt; 2628 Newcraighall Heritage & Residents Association)**
- Amend Table 4 and the Newcraighall East Site Brief to include the following text 'The finalised site capacity, design and layout should be informed by an adequate flood risk assessment'. **(2699 Scottish Environment Protection Agency)**
- Add a new principle to the site brief for HSG 27 to maintain green belt policy and to prevent coalescence between settlements – 'create new woodland along the southern and eastern boundaries to maintain the perception of separation between Edinburgh and Musselburgh'. **(2126 Cockburn Association)**

Representations seeking removal of HSG 29 Brunstane

Remove proposal from the Plan. **(0711 Brunstane Group; 0941 Gilberstoun Residents Association; 1022 Musselburgh Conservation Society; 1139 Bridget Wilson (supported by petition signed by 133 people); 1394 Joppa Residents Association; 1407 Craigmillar First; 1412 Craigmillar Labour; 1414 Niddrie Independent Parents Support (NIPS); 1504 Portobello Amenity Society; 2086 Persimmon Homes (East Scotland); 2096 Historic Scotland; 2111 Architectural Heritage Society of Scotland; 2117 Brunstane Residents Group; 2126 Cockburn Association; 2406 David Walker; 2414 Newcraighall & Brunstane Planning Group; 2553 The National Trust for Scotland; 2628 Newcraighall Heritage & Residents Association; 2660 Kezia Dugdale MSP; 2673 Sheila Gilmore MP; 2701 Portobello Heritage Trust; 2704 Portobello Community Council; 2711 Regius School; 412 individuals listed in Issue 10 Appendix A)**

Representations opposed to HSG 29 Brunstane in current form and seeking its removal and/or change

- Suggests removing the part of the site which is located to the east of the railway line. **(0322 Adrian & Roxane Laird Craig)**
- Suggests amending Brunstane Development Brief to make clear that the vehicular crossing over the railway line will not be at grade. **(0828 Network Rail)**
- Suggests increasing the amount of open space allocated within the development, with specific reference to the area adjacent to the National Trust for Scotland

property, in particular the Stable block and administration areas. **(1144 Geoffrey Brocklehurst)**

- Suggests including a bullet point under the Brunstane Development Principles on page 64 which states 'Site may require to contribute to potential mitigation measures at the A1/A720 Old Craighall roundabout if identified through an appropriate cumulative appraisal taking into consideration cross boundary effects'. **(2088 Scottish Government)**
- If development were to be allowed more needs to be prescribed to minimise the impression of coalescence. Seeks a change to the Brunstane Development Principles to include the creation of new woodland along the eastern and southern boundaries to strengthen Newhailes policy woodlands and create perception of separation between Edinburgh and Musselburgh**. (2126 Cockburn Association)**
- The proposals need to be improved, with greater consideration for traffic, congestion and pollution. **(2315 Joyce Smith)**
- Suggests that any development at this location should be restricted to the western area of the site and a substantial buffer zone of tree planting is established between Newhailes and the new development. **(2353 Garden History Society in Scotland)**
- Remove the proposal from the Plan or significantly reduce size of development. **(2609 Charles Wood)**
- Recommends that the site requirements clearly establish the following: the need for high quality boundary treatment adjacent to John Muir Way corridor, Brunstane House and Newhailes Garden and Designed Landscape; green corridors to provide multiple functions including cycling and walking; and green spaces, corridors and paths should respond to their context. The relationship to allocations within East Lothian should be a key determining factor. **(2697 Scottish Natural Heritage)**
- Table 4 and the Brunstane Site Brief should be amended to include the following 'The finalised site capacity, design and layout should be informed by an adequate flood risk assessment'. Table 4 and the Brunstane Site Brief should be amended to include the following 'Enhanced SUDS will be required to address current/future water quality pressures and to ensure no detrimental impacts to the recently designated bathing waters at Fishers Row'. **(2699 Scottish Environment Protection Agency)**
- Supports the allocation of HSG 29, but seeks amendment to the site brief to add two 'blue arrows' to indicate clearly that there are three vehicular access points. **(1161 EDI Group)**

<u>Representations opposed to SCH 9 Brunstane in current form and seeking its removal and/or change</u>

- Table 5 and the Brunstane Site Brief should be amended to include 'enhanced SUDS will be required to address current/future water quality pressures and to ensure no detrimental impacts to the recently designated bathing waters at Fishers Row'. **(2699 Scottish Environment Protection Agency)**
- The proposed primary school (SCH 9 Brunstane) is better located at Newcraighall North or East. **(0388 Pauline Cowan)**

Summary of responses (including reasons) by planning authority:

<u>Site selection - HSG 26 Newcraighall North, HSG 27 Newcraighall East & HSG 29 Brunstane</u>

- The LDP must conform to the relevant provisions of the approved SDP and its

Supplementary Guidance. These include a requirement for a generous allocation of housing land in the Council's area and the designation of a green belt around Edinburgh (SDP Policies 5, 7 and 12).

In preparing the LDP, the Council has sought to meet the overall housing land requirement in ways which prioritise use of brownfield sites in existing urban areas and which minimise the loss of land from the Green Belt, in accordance with SDP paragraphs 113 and 130. The Council's response to the representations in Issue 5 explains why it is nevertheless necessary for this LDP to make significant new releases of greenfield land from the green belt at this time, and of the scale set out in the Second Proposed Plan.

In selecting greenfield housing sites for release, the Council has sought to minimise the impact on greenbelt objectives and to secure long-term boundaries, in accordance with SDP Policy 12 and paragraph 130. To do so, the Council has assessed relevant greenfield land for its suitability in these terms. The site assessment process has gathered evidence on the relevant land on a systematic and consistent basis and presented its findings in a way which enables comparison and hence selection of those sites which are most appropriate. This approach has been informed by consideration of the findings and recommendations of the Report of Inquiry for the Edinburgh City Local Plan (pages 1-21 to 1-26).

For the LDP the Council has set out the evidence of its housing site assessment in the project's Environmental Report, which also presents the statutory Strategic Environmental Assessment of the Plan. The method and criteria used in the site selection process are described in Volume 1 of the Environmental Report – Second Revision, pages 26-33. The site assessments are set out in Appendices 5-9 (Volume 2) and, for some sites, the Environmental Report Addendum. At each stage of the LDP project the Environmental Report has been revised and updated as appropriate to:

- show what regard has been had to statutory representations received at the previous stage;
- respond to changes in the SDP context to the LDP, which have required additional housing land to be found.

The criteria used for the housing site assessment are set out in Tables 6 and 7 of the Environmental Report (Volume 1). They are structured using the three objectives for green belts stated in Scottish Planning Policy paragraph 49 and SDP Policy 12. They correspond to SDP policies and the content of Scottish Planning Policy as set out in Table 1, page 3 of the Environmental Report Addendum. The assessment findings set out in the appendices of the Environmental Report include the Council's overall conclusions about whether some or all of a site should be allocated in the LDP.

For ease of comparison, the assessment findings are presented in matrix form in Appendix 2 Updated of the Environmental Report Addendum (an updated version of Appendix 2 of the Environmental Report – Second Revision (Volume 1)). This is intended to be a similar format to that used in the Edinburgh City Local Plan Report of Inquiry. The LDP assessment uses a 'traffic light' symbology to indicate whether a site meets a criterion (green), does not meet it (red), or partly meets it / uncertainty (amber).

For sites selected and allocated in the LDP, a separate, statutory assessment of their likely environmental effects is set out in Appendix 3 of Volume 1 of the Environmental Report. In some cases this identifies likely adverse impacts. Section 4 of the Environmental Report sets these out along with proposed mitigation.

This site selection process has resulted in the Second Proposed Plan's spatial strategy, summarised on Figure 1 of the Plan. It meets the housing land requirements in full while designating a green belt which best meets the objectives of Scottish Planning Policy and SDP Policy 12. The spatial strategy includes plan-led coalescence in three places:

- with Newbridge in the west, justified by requirements of national policy and by new and planned public transport infrastructure
- with Straiton in the south, justified by public transport accessibility and by near-coalescence on the ground
- Musselburgh in the east, justified by coalescence on the ground and limited impact on the wider landscape setting of the city

The Second Proposed Plan's spatial strategy establishes and maintains strong, clear long-term boundaries to control the outward growth of the city.

No modification proposed.

<u>Representations opposed to HSG 26 Newcraighall North in current form and seeking its removal and/or change</u>

- Planning permission has been granted for a detailed scheme on HSG 26 Newcraighall North (Application reference 13/03181/FUL). The approved scheme is for 220 units and is under construction. The approved scheme took account of flood risk in its design, layout and capacity. **(0147 Martin Stobbart; 1504 Portobello Amenity Society; 2699 Scottish Environment Protection Agency)**

<u>Representations seeking removal of HSG 27 Newcraighall East</u>

Seek removal of HSG 27 Newcraighall East on the grounds of one or more of the reasons listed below:

- **Site Selection** – See the Council's general response on site selection and principle of development on page 9.

  Planning permission in principle has been granted for the portion of the site to the west of the powerlines. The eastern part of the site has been included within the LDP's allocation because it can help meet the new housing land requirement in a location which meets the criteria of the housing sites assessment set out in the Environmental Report (Volume 2 pages 106-107). This additional portion of the site will be served by the bus link included in the consented site, and has good existing access in its northern section. Development of the additional land would not impact significantly on the landscape setting of the city.
- **Transport Infrastructure** – As part of the Local Development Plan process, the Council has carried out a Transport Appraisal. (Volumes 1 and 2, 2013, Addendum, 2014) This appraised the cumulative impact of the new developments proposed in the Plan, taking account of other factors. This identifies improvements to transport infrastructure to deal with the net impact of new housing proposals in South East Edinburgh. These transport actions are set out in the Council's Proposed Action

Programme pages 33-34. The detail of these actions is being established through transport assessments required at the planning application stage. All relevant proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.

- **Biodiversity and Natural Habitat** – In preparing a Local Development Plan, the Council must comply with the Scottish Biodiversity Duty. This has been done by carrying out a Strategic Environmental Assessment. One of the objectives of the Strategic Environmental Assessment is to 'Protect and enhance biodiversity, flora and fauna, and habitat networks'. The Strategic Environmental Assessment's findings are available in the Environmental Report. Volume 1 page 34 sets out the method of assessment, which uses the maps in Volume 2 (page 3). The relevant findings regarding Brunstane are set out in Volume 1 page 72.The allocations do not have a significant harmful effect on biodiversity, flora or fauna.

  No modification proposed. **(0086 D & A Woodburn; 0147 Martin Stobbart; 0378 Barry Turner; 2457 Jacqueline Ritchie; 2181 Raymond Faccenda; 2182 Frances Faccenda; 0195 T Proudfoot; 2164 Chris Hewitt; 2628 Newcraighall Heritage & Residents Association; 2535 IB Hansen; 2711 Regius School)**

Representations opposed to HSG 27 Newcraighall East in current form and seeking its removal and/or change

- Planning permission in principle has been granted for the portion of the site to the west of the powerlines. The eastern part of the site has been included within the Plan's allocation because it can help meet the new housing land requirement in a location which meets the criteria of the housing sites assessment set out in the Environmental Report (Volume 2 pages 106-107). Development of the additional land would not impact significantly on the landscape setting of the city. The spatial strategy for the Plan includes plan-led coalescence in Musselburgh in the east, justified by coalescence on the ground and limited impact on the wider landscape setting of the city. The Second Proposed Plan's spatial strategy establishes and maintains strong, clear long-term boundaries to control the outward growth of the city. No modification proposed. **(0378 Barry Turner; 2126 Cockburn Association)**
- Planning permission in principle has been granted for the portion of the site to the west of the powerlines. It is appropriate for planning authorities to identify the capacities of housing sites in their Local Development Plans. To do so, it is necessary for them to make assumptions about density. The density assumption at Newcraighall East comes from multiplying the developable area identified on page 114 of the Environmental Report – Second Revision Vol. 2 (17 hectares), by the density range on page 28 of Volume 1 (27.5 to 32.5 dwellings per hectare). This is supported by National Planning Framework 3 and Scottish Planning Policy. National Planning Framework 3 paragraph 2.20 provides support for increased densities in key locations which are well served by public transport. South East Edinburgh is one such location, and the good accessibility of part of the Newcraighall East site is one of the reasons for its allocation in the Plan. Scottish Planning Policy in paragraphs 45 and 46 supports the use of higher densities to help achieve some of the six qualities of successful places. It should be noted that capacity range for Newcraighall East and for the other new housing allocations is low in the Edinburgh context. No modification proposed. **(1504 Portobello Amenity Society)**
- As part of the Local Development Plan process, the Council has carried out a Transport Appraisal. (Volumes 1 and 2, 2013, Addendum, 2014) This appraised the

cumulative impact of the new developments proposed in the Plan, taking account of other factors. This identifies improvements to transport infrastructure to deal with the net impact of new housing proposals in South East Edinburgh. These transport actions are set out in the Council's Proposed Action Programme pages 33-34. The actions for HSG 29 Brunstane include a review of the operation of A1/Newcraighall Road junction and improving pedestrian/cycle crossing facilities on Newcraighall Road. The detail of these actions is being established through transport assessments required at the planning application stage. All relevant proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance. **(2164 Chris Hewitt; 2628 Newcraighall Heritage & Residents Association)**

- Planning permission in principle has been granted for the portion of the site to the west of the powerlines. The fluvial flood risk is in this portion. The approved scheme took account of flood risk in its design, layout and capacity. **(2699 Scottish Environment Protection Agency)**

Representations seeking removal of HSG 29 Brunstane

- **Site Selection** – See the Council's general response on site selection and principle of development on page 9.
- **Transport Infrastructure** – As part of the Local Development Plan process, the Council has carried out a Transport Appraisal. (Volumes 1 and 2, 2013, Addendum, 2014) This appraised the cumulative impact of the new developments proposed in the Plan, taking account of other factors. This identifies improvements to transport infrastructure to deal with the net impact of new housing proposals in South East Edinburgh. These transport actions are set out in the Council's Proposed Action Programme pages 32-34. For Brunstane, the actions include improving pedestrian/cycle crossing facilities on Milton Road East and Newcraighall Road, safeguarding for link under the railway line, upgrading existing bus stops on Milton Road East and increasing frequency of direct city centre service. The detail of these actions is being established through transport assessments required at the planning application stage. All relevant proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.
- **Biodiversity and Natural Habitat** – In preparing a Local Development Plan, the Council must comply with the Scottish Biodiversity Duty. This has been done by carrying out a Strategic Environmental Assessment. One of the objectives of the Strategic Environmental Assessment is to 'Protect and enhance biodiversity, flora and fauna, and habitat networks'. The Strategic Environmental Assessment's findings are available in the Environmental Report. Volume 1 page 34 sets out the method of assessment, which uses the maps in Volume 2 (page 3). The relevant findings regarding Brunstane are set out in Volume 1 page 73.The allocations do not have a significant harmful effect on biodiversity, flora or fauna.
- **Air Quality and Pollution –** The Environmental Report identifies this as one of the main environmental issues currently prevalent within the Council area (Volume 1, page 40). It finds that the Plan's generally supportive development policies may lead to further negative cumulative and synergistic effects, particularly within key transport corridors. The current air quality issues are attributed mainly to traffic congestion and Air Quality Management Areas are in place with Council action plans setting out measures to help reduce vehicle emissions within these areas. The Council's Local Transport Strategy (2014-2019) identifies a range of actions and policies to reduce emissions and improve air quality standards across the city. With

specific regard to new allocations in strategic development areas, the Environmental Report identifies the potential for a short-to-medium harmful impact. Mitigation measures include:

- Locating development in accessible locations
- A number of public transport improvements

Other measures identified in site briefs and development principles in the Plan.

- **Ground Conditions** – The Plan sets out a density range for the new housing site allocations. This allows for masterplans to take account of any issues relating to ground conditions and instability arising from historical coal mining in the area.
- **Cultural Heritage** – The Environmental Report – Second Revision – Volume 1 page 73 acknowledges that development of the site would have a negative environmental effect on Category A Listed Buildings of Brunstane and NewhailesHouse, together with the Newhailes Inventory site and the setting of two Scheduled Ancient Monuments. The Brunstane (HSG 29) Development Principles and Site Brief set out on pages 64-65 of the Plan contain a number of measures in order to mitigate these effects, in particular bullet points 6, 9 and 10.

  As evident in the letter dated 12 February 2015 from the Council to Historic Scotland, Historic Scotland has advised that open space proposals, subject to suitable management regimes, could adequately mitigate the impact of development upon the existing Scheduled Ancient Monuments.

  To begin to understand the significance of the existing landscape to the setting of Brunstane House and the importance of views from and to Brunstane House, a Historic Landscape Assessment has been undertaken on behalf of the EDI Group Limited. This concludes that:

  - There is some evidence of a designed landscape that formerly surrounded Brunstane House and the sole surviving element is the woodland belt situated to the south east of the house;
  - There is evidence that the policies closest to the house were laid out as formal gardens; these altered over time but there are no surviving elements;
  - There is little evidence to suggest that the land furthest from the house was ever laid out in a designed manner;
  - There was a clear design intention to provide views from the Duke of Lauderale's great chamber toward the Firth of Forth and Fife and the garden to the east.

  The Council acknowledges that Brunstane currently has a partial setting of agricultural character but equally considers that the historic landscape around the house has been much changed and eroded over the centuries.

  As a mitigation measure, to provide a setting to Brunstane House, the Plan proposes as a minimum a 2 hectare public open space to assist in retaining an open setting of semi-natural character to the north and east of Brunstane House. This measure would additionally deliver the Council's Large Greenspace Standard, addressing an existing deficiency in access to green space and providing for the proposed new residential community.

  The location for the proposed 'new greenspace' shown on the brief on page 65 of the Second Proposed Plan is indicative only but relates to the late 1800s pattern of enclosure. No modification is proposed, however, the Council seeks merit in part of the representation and considers that the final proportions, design and layout of the

open space should be informed by on-going historic surveys to establish the detailed scheme of mitigation, including retention of views to the house. The wording of the site brief could be amended to state this.

The Council acknowledges that views from Brunstane House, which contribute to its setting would be replaced by shorter-range views across the proposed open space use. The continued growth of young planting along the Brunstane Burn and at Brunstane Mill Park beyond the site boundary will also influence the availability of views to the wider landscape.

The proposed greenspace would safeguard short range views toward Brunstane House, which contribute to its setting. In particular, views to its northeast and southeast facades from the north and east would remain set against the backdrop of woodland at Gilberstoun and skyline of Arthur's Seat.

Long range views from within the site to Brunstane House could be mitigated via retained vistas through street alignments and avenue tree planting. The Council would support this objective generally in accordance with Policy Des 3, but if considered necessary there could be merit in such a requirement being specifically included within Development Principle bullet 9.

The housing site assessment on page 110 of the Environmental Report – Second Revision, Volume 2, June 2014, found that development would not impact on the principal vista from Newhailes House towards the Forth Estuary. The existing boundary tree belt at Newhailes to the east of the site is sufficiently dense and includes evergreen understorey planting, which effectively filters views to the site, even in winter months. Bullet point 10 within the Brunstane Development Principles on page 64 of the Plan requires the siting and detailed design of the proposed housing to specifically consider the views from the grounds of Newhailes House, including the planned skyline view to Arthur's Seat, and for a new and site specific landscape framework to be provided along the east boundary of the proposed allocation in order to avoid visual intrusion upon the Inventory Site. This would supplement the existing enclosure of the wooded pleasure grounds which line the Newhailes Burn within the tree belt.

The Council acknowledges that the detailed design of such mitigation may result in the intensification of development elsewhere upon the site, which is considered appropriate in the context of a density range of 25 to 35 dwellings per hectare and requirement for this strategic allocation to provide a new local centre.

- **Land Ownership** – The potential for perceived conflicts of interest for local authorities that are both planning authority and landowner is recognised in the planning system. There is government advice on the matter in Planning Advice Note 82 Local Authority Interest Developments. Local Authorities own significant areas of land within their boundaries, and it is not unreasonable that some of that land will be proposed for development. But as planning authorities, it is essential that any choices made in selecting sites for future development through the development plan process must be based on the best interests of the planning of the area. Decisions should not be influenced by any possible conflict of interests or gain to the authority through the sale of its land to developers. The process of site selection is set out in the accompanying Environmental Report. In 2011 and 2013, the Environmental Reports accompanying the Main Issues Report and first Proposed Plan explained why Brunstane was not then considered appropriate for housing

allocation. The Revised Envrionmental Report – Second Revision Volume 2 sets out the assessment explaining why the Council has proposed it for allocation to help meet the new, higher housing target for the Plan. The Planning Advice Note 82 also summarises in paragraph 14 the statutory requirement for local development plans to include a schedule of council land ownership. Appendix D of the Plan sets this out.

No modification proposed.

(0711 Brunstane Group; 0941 Gilberstoun Residents Association; 1022 Musselburgh Conservation Society; 1139 Bridget Wilson (supported by petition signed by 133 people); 1394 Joppa Residents Association; 1407 Craigmillar First; 1412 Craigmillar Labour; 1414 Niddrie Independent Parents Support (NIPS); 1504 Portobello Amenity Society; 2086 Persimmon Homes (East Scotland); 2096 Historic Scotland; 2111 Architectural Heritage Society of Scotland; 2117 Brunstane Residents Group; 2126 Cockburn Association; 2406 David Walker; 2414 Newcraighall & Brunstane Planning Group; 2553 The National Trust for Scotland; 2628 Newcraighall Heritage & Residents Association; 2660 Kezia Dugdale MSP; 2673 Sheila Gilmore MP; 2701 Portobello Heritage Trust; 2704 Portobello Community Council; 2711 Regius School; 412 individuals listed in Issue 10 Appendix A)

<u>Representations opposed to HSG 29 Brunstane in current form and seeking its removal and/or change</u>

- The land was assessed as part of the assessment area 'Brunstane Farmland' (pages 110-111 of the Environmental Report – Second Revision Volume 2). This found that 'The East Coast Railway Line provides physical division within the site but that the site is open and lacks features which could form an edge to development'. The site, therefore, requires to be considered in its entirety in terms of green belt release. No modification proposed. **(0322 Adrian & Roxane Laird Craig)**
- No modification proposed. However, the Council sees merit in amending the Brunstane Development Brief to make clear that vehicular crossing over the railway line will not be at grade. **(0828 Network Rail)**
- The development principles contained within the Site Brief for Brunstane (pages 64-65 of the Plan) require any masterplan for the site to make provision for a new landscape framework to the western boundary of the grounds of Newhailes House. In addition, development in this part of the site will be required to observe a 30m set-back to either side of the existing high voltage overhead powerlines. This will afford additional open space between the development and Category C Listed stable court. No modification proposed. **(1144 Geoffrey Brocklehurst)**
- It is noted that Plans should take account of the cross boundary transport implications of all policies and proposals. The study that Transport Scotland is currently progressing with the SESplan authorities is intended to address cross-boundary impacts of the development proposals. The scope is agreed and Transport Scotland is contributing to the study. The outputs of the study will inform future annual iterations of the Developer Contribution and Affordable Housing Guidance and the LDP Action Programme as appropriate. No modification proposed. **(2088 Scottish Government)**
- The Brunstane Development Principle on page 64 of the Plan requires any masterplan to provide a new landscape framework to the boundary of the Newhailes Inventory site. The detailed siting and design of dwellings must also respect views to Arthur's Seat from Newhailes House.

The Council considers that a blanket area of woodland to the east of the site would not facilitate the sensitive integration of development with its setting and that scope should be retained for a combination of site-specific green infrastructure approaches at the masterplan stage. The perimeter woodland belts to the west of Newhailes House are already in the order of 30 – 50 m wide and provide strong containment between the site and grounds of Newhailes House. The southern boundary of the site adjacent Newcraighall North (HSG 26), includes an existing overhead powerline wayleave, where tree planting would be prohibited and where allotment provision is outlined. Consequently, no further woodland planting would be required to this boundary.

Prevention of coalescence is no longer a specific objective of green belt policy, as set out in Scottish Planning Policy. The Council's housing site assessment on pages 110-111 of the Environmental Report - Second Revision, Volume 2, found that the site's low-lying and visually contained location had limited value in maintaining the character, landscape setting and identity of the City, being perceived from local path networks only. The SDP Policy 12 makes provision for plan-led coalescence where justified by the Local Development Plan settlement strategy.
In addition to existing woodland at Newhailes and along the Brunstane Burn corridor, green spaces within the site brief will continue to provide structure within the landscape, whilst improving cross-boundary path and public transport connections.

No modification proposed. **(2126 Cockburn Association)**

- As part of the Local Development Plan process, the Council has carried out a Transport Appraisal. (Volumes 1 and 2, 2013, Addendum, 2014) This appraised the cumulative impact of the new developments proposed in the Plan, taking account of other factors. This identifies improvements to transport infrastructure to deal with the net impact of new housing proposals in South East Edinburgh. These transport actions are set out in the Council's Proposed Action Programme pages 32-34. For Brunstane, the actions include improving pedestrian/cycle crossing facilities on Milton Road East and Newcraighall Road, safeguarding for link under the Newcraighall railway line, upgrading existing bus stops on Milton Road East and increasing frequency of direct city centre service. The detail of these actions is being established through transport assessments required at the planning application stage. All relevant proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance. No modification proposed. **(2315 Joyce Smith)**
- The Council considers that the existing perimeter woodland at Newhailes which range from 30-50m width already provides a good degree of containment to the site, even in winter months and as experienced in views from the raised terrace of Lady's Walk. This would be subject to enhancement and additional controls set out in Site Development Principles for Brunstane (HSG 29), under bullet point 10, 'Landscape framework to be provided to boundary of Inventory Site and detailed siting and design of dwellings to respect views to Arthur's Seat from grounds of Newhailes House'.

  Development will also be required to observe a 30 m set-back to either side of the high voltage overhead power lines. This will afford additional open space between the development and Listed Buildings along this boundary. The partial enclosure of landform, coupled by woodland and understorey planting, restricts views to the

development site from the Water Garden, which will be supplemented by the required landscape framework.

There is currently no open outward view across the site from the Shell Grotto, which is partly enclosed by evergreen shrubbery. Potential to recreate this view would be restricted by the development. However, this visual axis is also now substantially altered by the white buildings of Edinburgh College's Milton Road East campus, which are five storeys in height and detract from views to this aspect. Any proposals for the site's landscape framework would be required to mitigate the impact of development on this feature.

No modification proposed. **(2353 Garden History Society in Scotland)**

- It is appropriate for planning authorities to identify the capacities of housing sites in their Local Development Plans. To do so, it is necessary for them to make assumptions about density. The density assumption at Brunstane comes from multiplying the developable area identified on page 114 of the Environmental Report – Second Revision Volume 2 (48 hectare), by the density range on page 28 of Volume 1 (27.5 to 32.5 dwellings per hectare). This is supported by National Planning Framework 3 and Scottish Planning Policy. National Planning Framework 3 paragraph 2.20 provides support for increased densities in key locations which are well served by public transport. South East Edinburgh is one such location, and the good accessibility of part of the Brunstane site is one of the reasons for its allocation in the Plan. Scottish Planning Policy in paragraphs 45 and 46 supports the use of higher densities to help achieve some of the six qualities of successful places. It should be noted that capacity range for Brunstane and for the other new housing allocations is low in the Edinburgh context. No modification proposed. **(2609 Charles Wood)**
- Many of these recommendations are set out in the Brunstane Development Principles on page 64 of the Plan and will be important considerations in the determination of any subsequent planning application. The impact of development on the Innocent Railway Core Path, which follows the Brunstane Burn valley and forms part of the John Muir Way, will be considered against Design Policies 4, 7, 8 and 10 covering impact on setting, layout, landscape design and waterside development. The relationship of the development to this existing green corridor and provision of new multi-functional greenspace, will be further informed by the quality expectations for green networks set out in Section 3 of the Edinburgh Design Guidance. No modification proposed. **(2697 Scottish Natural Heritage)**
- The issue of flood risk for all developments, not just LDP proposals is addressed through Policy Env 21. No modification proposed. **(2699 Scottish Environment Protection Agency)**
- It is not considered necessary to amend the site brief to add further blue arrows to indicate vehicular access from Newcraighall Road through the Newcraighall North site into the Brunstane site. The site brief on page 65 of the Plan shows three vehicular access routes and development principles on page 64 which state 'vehicular access to be taken from Milton Road East and Newcraighall Road, forming a new vehicular crossing over the East Coast railway line.' No modification proposed. **(1161 EDI Group)**

Update from Capital Coalition Motion 14 May 2015:
The Council notes that a Reporter's decision in relation to Edmonstone (PPA-230-2131) will add another 368 houses to the housing supply which is not included in the Council's windfall assumption. This additional supply could be used to reduce the

housing total for Brunstane HSG 29 (Issue 10) by the same amount.

Representations opposed to SCH 9 Brunstane in current form and seeking its removal and/or change

- Policy Des 6 ii in Part 2 of the Plan supports the use of SUDs in new development to ensure that there will be no increase in rate of surface water run-off in peak conditions or detrimental impact on the water environment. No modification proposed. **(2699 Scottish Environment Protection Agency)**
- The Education Appraisal provides a cumulative assessment of the additional education infrastructure required to support the new housing development identified within the Plan. It identifies new schools in appropriate location for catchment purposes. It would not be appropriate to put the new primary school in the Newcraighall sites. No modification proposed. **(0388 Pauline Cowan)**

Reporter's conclusions:

Context

1. Paragraph 119 of Scottish Planning Policy states that local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Allocated housing sites should be effective in meeting the housing supply target. Policy 5 of SESplan sets out the housing land requirement for the SESplan area, and Supplementary Guidance provides the required share of this housing within the City of Edinburgh. I refer to the findings in Issue 5 relating to the sufficiency of the housing land supply in this context.

2. The spatial strategy of both SESplan and the local development plan prioritises the development of housing within 4 strategic development areas, and these proposed sites lie within (or adjacent to) the South East Edinburgh strategic development area. Whilst it has not been possible to avoid some release of green belt land in meeting the housing land requirement, the council has sought to minimise the impact on green belt objectives. The assessment of the allocated sites is set out in the environmental report, which is the context for my examination of the representations relating to these sites.

3. In the circumstances, the inclusion of existing green belt land within the housing allocations is necessary in order to meet the housing land requirement over the plan period in full. However, this would not prevent the deletion or modification of particular sites where it is found through this examination that such sites would not be appropriate with respect to their environmental impact or the available infrastructure. Alternative means would then need to be found in order to make up any resulting shortfall.

HSG 26 Newcraighall North

4. This site has full planning permission for 220 houses and is under construction. A significant number of houses have already been built, and the rest of the site is being prepared for the construction of the remaining houses. The site should therefore be allocated in the plan for housing development, and there is no requirement in this case to further examine the environmental effects or infrastructure constraints.

5. The capacity of the site is stated to be 150 to 210 houses, but since planning permission has now been granted for 220 houses, I find that the capacity should be amended to simply state 220 houses, as this represents the most accurate and up to date position. Since full planning permission has been granted, and the site is under construction, there is no basis to include a requirement within the development principles for a flood risk assessment. There is no evidence before me to suggest that the development principles or the associated diagram within the site brief require amendment.

HSG 27 Newcraighall East

6. The western part of this site has planning permission in principle for housing development. The precise number of houses will depend on the submission of reserved matters, although I note that this should not exceed 176. I noted on my site inspection that some earth moving operations are underway on site, which may be in order to investigate ground conditions. The area with planning permission in principle extends as far as the electricity transmission lines crossing the site from north to south. Within that area I need to take into account the fact that planning permission in principle has been granted, although in the circumstances it remains open for me to examine appropriate matters including the development principles and the diagram within the site brief.

7. The eastern (smaller) part of the site, beyond the electricity transmission lines, would constitute an extension to the site already with planning permission in principle for housing development. From the diagram in the site brief, I note that there is a proposed green corridor under the electricity transmission lines which forms a break between the 2 areas of housing development. This greenspace would be fronted by new development in order to improve community safety and aid placemaking, which also means that the site with planning permission in principle could readily be allocated in the local development plan independently of the proposed extension.

8. Nevertheless, from my site inspection, the whole of the site forms a single field in agricultural use, with substantial vegetation along the southern boundary. Therefore, whilst the matters referred to below with respect to the spatial strategy and green belt as they apply to HSG 29 (Brunstane) are relevant to some extent, they are not in my view significant matters to examine for this site. Despite the vegetation along the southern boundary, the Queen Margaret University Campus is prominent to the south. The site is low lying, and further housing to the east of that which already has planning permission in principle would have no significant adverse impact on the landscape setting of the city. There is no evidence of any significant additional adverse effect on biodiversity or the natural habitat of the area. Sufficient integration with the existing urban area would occur.

9. An increase in actual coalescence with the urban area of Musselburgh would occur with the development of the whole of this site, and particularly if housing development within East Lothian also occurs to the south east of the site. However, I find that there would be no significant increase in coalescence specifically as a result of extending the housing to the east of that which already has planning permission in principle.

10. There are also representations stating that the site constitutes prime agricultural land. However, most of the agricultural land surrounding Edinburgh is classified as prime agricultural land, and since green belt land requires to be allocated in order to meet the housing land requirement, and part of the site of HSG 27 already has planning permission in principle, I find that there is no basis for the exclusion of this housing site simply because it is prime agricultural land. Being in agricultural use, the site has limited use for recreation,

although pedestrian access is easily obtained into the site from Newcraighall village. Access to the recreational area to the west by pedestrians and cycles is in any event provided for within the development principles and the site brief, as further referred to below.

11. The representations raise the cumulative increase in traffic levels, which would result in increased congestion from the proposed 1,925 houses on all 3 allocated sites within the Newcraighall area. This is particularly an issue with respect to HSG 29 (Brunstane) below, but it is not such a significant issue with respect to HSG 27, the larger part of which has planning permission in principle. With respect to concern expressed in representations about the effect of the vehicular access to the site causing disruption to existing properties, from my site inspection, I am satisfied that the amenity of such properties would be maintained through careful design, layout and landscaping of the proposed access to the site at the development management stage. The cumulative education and health issues raised in the representations are likewise focused on HSG 29 (Brunstane) where a new primary school is proposed. I note however that an extension to the existing primary school adjacent to HSG 27 is included within the development principles.

12. The capacity of the site is stated to be in the order of 275 to 385 houses, which represents a fairly wide margin of flexibility. Since a maximum of 176 houses has been already approved, this leaves some 99 to 209 houses (with a midpoint of 154 houses) for the remainder of the site. The lower figure would be more than one third of the total number of houses on this basis, and given the relative areas of the site with planning permission in principle and the proposed extension, I find that the eventual capacity appears more likely to be towards the lower end of the range.

13. However, I do not consider that there is sufficient justification for any modification of the capacity identified within Table 4. In the context of the development of housing within the South East Edinburgh urban area, and Newcraighall Village in particular, I find that this range of density is appropriate, and would not have any significant adverse effect on the character of the village. The amenity of the existing housing and school along the northern boundary of the site could be sufficiently maintained by careful attention to the layout and landscaping of the housing through the development management process.

Development principles and site brief

14. With respect to the development principles and the site brief, I find that the proposed bus route which extends into the site from the proposed housing site at Brunstane to the north, and beyond the site southwards to connect with the Queen Margaret University Campus, would make a significant contribution to the provision of sustainable means of transport. However, the transport implications from new housing development in the Newcraighall area are further examined in the context of HSG 29 (Brunstane) below, and this includes the delivery of the proposed bus route. There is an existing recreational ground to the west, and footpath/cycle links into this area would assist the integration of the proposed new housing site within the existing urban framework. The transport appraisal justifies the provisions made within the development principles in relation to this.

15. The proposed green corridor provides a significant environmental enhancement within the overall development proposals, and is a benefit resulting from the development of the whole site. I note that there is additional woodland proposed along part of the southern boundary of the site. This is where there is already the most vegetation along the boundaries of the site, and I find that this additional woodland should be continued along

the whole of the southern boundary in order to enhance the landscape setting of the site and maintain a defensible green belt boundary to the south. I find that this should be referred to in the development principles and shown on the diagram, for the avoidance of doubt. There should also be appropriate screen planting on the eastern boundary, but I find that it is appropriate to leave this matter to the development management process. There is little room for a strip of woodland in the area to the east of the electricity transmission lines, given the green corridor that is being provided through the site.

16. I note that the fluvial flood risk to the site is considered by the council to lie within that part of the site which already has planning permission in principle. I note the council's statement that the approved scheme took account of flood risk in its design, and I further note that a condition has been imposed on the planning permission in principle requiring the submission and approval of a flood risk assessment. In any event, the number of houses and the layout of the site are likely to depend upon matters reserved in the conditions of the permission in principle. I therefore find that this matter should still be referred to in the development principles. However, it is not necessary to include any reference to this in Table 4 because the stated capacity range is indicative only.

Overall conclusion

17. I conclude in overall terms that the development of the whole site (including the proposed extension) for housing would not undermine the objectives of the green belt, and would make an appropriate contribution to the housing land requirement. I find that the development principles are appropriate, subject to the extension of woodland along the whole of the southern boundary of the site, and the need for a flood risk assessment, being included within the site specific development principles within the site brief.

18. I therefore conclude that HSG 27 at Newcraighall East should remain designated in the plan as shown on the proposals map, including the extension of the site beyond the power lines to the east, with an amendment to the development principles as set out in the recommendations below. It should however be noted that the general development principles for South East Edinburgh relating to cumulative impact, recommended through Issue 21, may apply to this proposed housing site (and particularly the proposed extension) also taking into account the extent of housing proposed at Brunstane (examined below). A reference to this is therefore recommended within the development principles for the site.

HSG 29 Brunstane

General

19. This proposed housing site constitutes a significant release of green belt land. The site area is some 48 hectares and the potential capacity for housing development extends to 1,330 houses. It is therefore to be expected that the development of the site would have significant environmental effects and infrastructure requirements, and this is reflected in the extensive number of representations submitted with respect to the allocation of this site. The majority of the representations seek the removal of the site from the proposed plan, although in the event that the site is allocated for housing development, some seek a reduction of the size of the site and scale of development, whilst others seek further provisions being made within the development principles on various matters. I examine the proposed housing site under the key subject matters raised within the representations, taking into account both the principle and scale of development, and matters set out in the site brief.

Programming the housing land requirement

20. Representations express concern that all of the housing to meet the need identified over the next 10 years is allocated in the proposed plan. It is submitted that this should not all be allocated now, but rather on a phased basis, with some of the housing being left to the next review of the local development plan, in order to more properly balance the need to provide housing land with the protection and maintenance of the green belt. I recognise that this would be likely to provide more focus on brownfield sites and regeneration in areas like the Edinburgh Waterfront. However, this may also result in insufficient housing being built over the plan period, because the current land supply position as assessed through Issue 5 demonstrates that brownfield sites alone will not meet the SESplan housing target. A masterplan approach to brownfield sites and regeneration is being used to provide appropriate infrastructure for the new housing development, and this will assist in the implementation of brownfield sites.

21. In any event, paragraph 119 of Scottish Planning Policy states that local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. It would therefore not be consistent with Scottish Planning Policy to phase the housing land requirement over the next 10 years in 2 consecutive local development plans. It is necessary for this proposed plan to allocate housing land for the full 10 year period.

The spatial strategy

22. The spatial strategy of SESplan prioritises development within 4 strategic development areas in the regional core (City of Edinburgh), one of these being South East Edinburgh. From Figure 3, the site appears to fall outwith the South East Edinburgh strategic development area, as the shading is shown to the south west of the A1. However the spatial strategy map is illustrative rather than precise, and just as Policy Env 12 clarifies it is for the council to define the boundaries of the green belt to meet development requirements, I consider there is similar flexibility around the geographical extent of the strategic development areas. Consequently I do not consider that the location of the site relative to the illustrative map in SESplan excludes it from consideration.

23. Furthermore, Policy 7 of SESplan states that sites for greenfield housing development proposals, either within or outwith the identified strategic development areas, may be allocated in local development plans in order to maintain a 5 years effective housing land supply, subject to satisfying specific criteria to the effect that development will be in keeping with the character of the settlement and local area, will not undermine green belt objectives, and additional infrastructure required is either committed or to be funded by the developer. I am examining all of these criteria in my consideration of this proposed housing site, because the provisions of Policy 7 are particularly important with respect to the principle of concentrating housing and employment provision in sustainable locations.

24. There is reference in the representations to West Edinburgh being a more sustainable location for housing development. I accept that West Edinburgh is a sustainable location, but significant housing allocations there are already included in the local development plan. Furthermore, significant regeneration is being promoted, including housing development, at the Edinburgh Waterfront and in the city centre, and even with this there is still clearly a requirement for further green belt land release. South East Edinburgh is the other major

strategic development area in which such releases need to be focused in the context of SESplan. In overall terms, I find that the council has a generally well-balanced approach towards housing development, and that the spatial strategy is therefore sound.

25. All of the above is however dependent on my examination of the further issues below relating to loss of green belt, landscape impact and coalescence, also taking into account other environmental considerations including an assessment of the effect on the character of the area, which in this case relates to the character of the surrounding urban areas including Gilberstoun and Newcraighall, and the heritage of the area including Brunstane House and Newhailes House garden and designed landscape. I then consider the transport and other infrastructure implications arising from this proposed housing allocation.

26. Some of the representations refer to alternative uses for the site, but such is not within the scope of this examination. Circular 6/2013 simply requires that the plan is sufficient and appropriate with the housing sites that have been allocated. If the plan is not sufficient without additional sites or if sites allocated are not appropriate, this can be considered through the examination, but it would not be appropriate to make a judgement about what is considered to be the best use for any particular site.

Loss of green belt

27. Policy 12 of SESplan requires the local development plan to define and maintain a green belt around Edinburgh, in order to maintain the character of the city and prevent coalescence (unless otherwise justified by the local development plan settlement strategy), direct planned growth to the most appropriate locations and support regeneration, maintain the landscape setting of the city and provide opportunities for access to open space and the countryside.

28. I find that the council's approach reflects the SESplan spatial strategy by directing planned growth to the most appropriate locations. It supports regeneration and minimising the impact on green belt objectives by focusing housing development within the strategic development areas, but not exclusively so. The impact on the landscape, coalescence and the character of the area are considered under separate headings below.

29. The site constitutes prime agricultural land. Paragraph 80 of Scottish Planning Policy seeks to protect such land but recognises that loss of this land may be justified as a component of the settlement strategy. Most of the agricultural land surrounding Edinburgh is classified as prime agricultural land, and since greenfield land requires to be allocated in order to meet the housing land requirement, I find that there is no basis to delete the site from the local development plan simply because it is prime agricultural land. Furthermore, because the site is in agricultural use, it creates limited opportunities in providing access to open space at the present time. Housing development would not prevent access through the site or to the Newhailes garden and designed landscape, and the site has limited access to the wider countryside, so I find that the loss of green belt would not undermine green belt objectives with respect to access to open space and the wider countryside.

Landscape

30. The housing site assessment in Volume 2 of the environmental report recognises that development would impact on the rural character of the remaining farmland between Edinburgh and Musselburgh. However, it is concluded that housing development on this

flat and low lying site would not affect the landscape setting of the city. In the Edinburgh Green Belt Study (Volume 2) of 2008, the site is identified within Area A of the Brunstane Farmland Landscape Character Area. It is noted that the area is not highly visible due to its relative enclosure by settlement and woodland, although views are possible from the urban edge. However, it is concluded that the site provides a setting for the policy woodlands, and visual and physical separation between Edinburgh and Musselburgh, and for this reason the area has no landscape capacity for development.

31. The visual and physical separation between Edinburgh and Musselburgh is considered further under the heading of coalescence below. With respect to landscape and visual impact generally, I have noted from my site inspection that the land is flat and low lying, and that the site is also well contained by woodland and mature trees along its boundaries generally to the north and east. This would clearly reduce the visual impact of the development of this large site on the wider landscape setting of the city. The site also adjoins the existing built up area at Gilberstoun (including Brunstane House) to the west, and Newhailes House garden and designed landscape along its eastern boundary, and issues relating to the impact on the character of these areas and the heritage assets contained within are considered further below.

32. However, there is a core path running along its south west boundary, which adjoins the northern boundary of HSG 26 (which is now under construction) referred to above. From this footpath the site is very open in places, and there are extensive views over the whole of the site. Notwithstanding that it is farmland, there appears to be access for informal recreational purposes throughout the site. Together with the site already under construction to the south, there would be a significant change to the landscape character of the area and the setting of this eastern edge of the built up area of the city. I find that to state (in the overall assessment of the Brunstane Farmland on page 111 of Volume 2 of the environmental report) that development would not affect the landscape of the city therefore understates the landscape impact from the development of over 1,000 houses in this location. With the shortfall in the programmed housing land identified through Issue 5, there may now be a different balance to be drawn between housing need and landscape impact, and therefore the justification for allocating the site, but this does not change the actual landscape impact from development on the site.

33. Following on from the above, I find that there would be some adverse impact on the landscape setting of the city. However, owing to the low lying nature of the land, and the extensive vegetation screening the northern and eastern boundaries of the site, I find that this adverse impact would be restricted to fairly local views. I find on balance that the development of the site for housing would not significantly undermine green belt objectives with respect to the impact on the landscape setting of the city.

Coalescence

34. The site lies at the edge of the urban area of Edinburgh, with the eastern boundary being defined by the council's administrative area. Newhailes House garden and designed landscape lies within East Lothian, and beyond this is the urban area of Musselburgh. Recent development including the Queen Margaret University Campus has already increased coalescence on the ground between Edinburgh and Musselburgh, and this would be further extended by housing development on this site. However, it is probably correct to state that the Brunstane site, together with Newcraighall East and land between that site and the Queen Margaret University Campus, and the Newhailes House garden and designed landscape, is the only significant remaining green belt land between the

eastern edge of Edinburgh and Musselburgh. It therefore provides limited separation between them.

35. The council has referred to the fact that Scottish Planning Policy no longer includes the prevention of coalescence as an objective of green belt policy. However, paragraph 49 still refers to protecting the identity of settlements and the prevention of coalescence may be relevant in that context. In any event, preventing coalescence remains an element of Policy 12 of SESplan. Coalescence in this case also appears to be a key factor in the conclusion in the Edinburgh Green Belt Study that the site has no landscape capacity for development. Paragraph 16 of the local development plan specifically states that the development of this site would result in further coalescence between Edinburgh and Musselburgh. The paragraph also states however that, whilst development resulting in the coalescence of settlements is not normally supported, it is justified in this instance because the site compares favourably to other possible options in the housing site assessment.

36. Furthermore, from my own site inspection of the area, I find that there would be little visual perception of coalescence with Musselburgh from the site, or from the core path to the south west of the site, following its development for housing. This essentially results from the intervening Newhailes Estate, which maintains a strong visual separation of the existing urban areas through its designated landscape including mature woodland.

37. Following on from the above, I find that there is already limited physical separation between the settlements of Edinburgh and Musselburgh, but that in any event there would be little visual perception of coalescence with Musselburgh (from the site or from the existing urban edge) following the development of this site for housing. Any additional coalescence resulting from the allocation of this site for housing would not undermine green belt objectives. The high density of the housing development is raised within the representations, but the location of the site does not in my view require that consideration be given to low density housing simply because it is at the edge of the city.

Biodiversity

38. The site, and particularly mature woodland and other vegetation along its boundaries, and along the railway line traversing the site, is likely to provide a natural habitat for local wildlife species. Various wildlife species, including protected species, are referred to within the representations. However, in the event that any such species are subsequently found on the site, I am satisfied that the interests of such wildlife would be satisfactorily protected by the Conservation (Natural Habitats, &c.) Regulations 1994. There is also a reference to the land being identified in 2002 as a biodiversity area, and the Brunstane Burn is considered to be of particular significance as a wildlife habitat.

39. However, Volume 1 of the environmental report does not raise any adverse issues relating to the biodiversity of the site. Furthermore, the site is not designated as being of particular value for local nature conservation, and is not likely to be any more sensitive than other farmland within the green belt which is being considered for release to meet the housing land requirement. I therefore find that there is no biodiversity interest in the site of such significance that would warrant the removal of the housing allocation from the local development plan.

Character of the area

40. Concern is expressed within the representations about the effect of significant new

housing development on the character of Newcraighall Village, which is understood to be the last mining village in Edinburgh. This is considered to be a cumulative impact with the development of the Newcraighall North and Newcraighall East sites; both of which now have planning permission and housing on the former site is under construction.

41. I find that the character of this village has already changed significantly with the development of HSG 26, Newcraighall North, and that housing development at Newcraighall East would further alter this character; although not to an extent that development would have a significant adverse effect on the character of the village. Housing on both of these sites would integrate quite well with the existing built form of the area. Brunstane extends further from Newcraighall Village and would actually have less visual impact on its built form. The effect on the transport network through the village would however be significant, and this is further examined below.

42. There is also visual separation between the site and the urban area to the north, which is separated from the site by the Brunstane Burn core path (John Muir Way), and extensive mature woodland along this route. There is however a transport related issue, with respect to the proposed new bus route leading to Milton Road East, particularly with respect to existing housing along this road. This is also further examined below.

43. There is extensive vegetation along the boundary of the site with Gilberstoun, although there is significant overlooking of the site from new housing at the north west corner of the site, which would require careful attention with respect to the layout and landscaping of the site. There is also an outlook over the site from Brunstane House, and this is further considered under the heading of heritage below. The site is well screened from the Newhailes House garden and designed landscape to the east.

44. Taking into account my findings on landscape above, I have no doubt that a significant housing development of 1,300 houses would change the character of this area quite considerably, because it would constitute the development of a large open area of existing farmland. This would be particularly evident from the core path along the south west boundary of the site, and generally elsewhere from the boundaries of the site. However, it would not be perceived to a significant extent from elsewhere within the surrounding urban area, including Milton Road East, Gilberstoun and Newcraighall Village.

45. With careful mitigation in terms of layout, landscaping and open space, I find that the proposed housing site would be in keeping with the general character of the surrounding urban area. In overall terms I find the statement in the housing site assessment on page 110 of Volume 2 of the environmental report to be accurate to the extent that it confirms that the site can be integrated into the settlement and local area, and that green belt objectives would not be undermined in this context.

Heritage

46. There are important heritage matters to consider, relating to the impact from development on the adjacent category A listed Brunstane House, Newhailes House with its associated garden and designed landscape, and scheduled monuments extending into the site. Representations from groups and individuals, including the Architectural Heritage Society of Scotland, maintain that this area of green belt should be retained as the appropriate setting for the heritage interests in the area. The most significant effect is on Brunstane House, and in addition to the concerns of the local community, Historic Scotland, which is now Historic Environment Scotland (HES), considers that the adverse

effect on the setting of this listed building is sufficiently significant as to justify the removal of the housing site from the proposed plan.

47. This is a listed building of national importance, and HES in its representation sets out a description of the importance of the building, dating from the 16th century or earlier, and being extensively remodelled in 1639, and then in 1673 resulting in the current U-plan mansion with corner turrets on the long garden elevation facing south east. The building was further extended with a range of offices in 1733 by the architect William Adam. There are many significant internal features described in the representation.

48. The listed building however would not be directly affected by the proposed housing site. It lies within a substantial garden and there is extensive mature vegetation within the curtilage of the building, extending to the western boundary of the proposed housing site. Nevertheless, the listed building is quite close to the boundary, and the north east and south east elevations of the building are visible from the site. The setting of the listed building is therefore an important consideration.

49. I agree with HES that the setting of Brunstane House consists of the wider landscape visible from the house, and views of the house from the wider landscape. That wider landscape consists of the proposed housing site, which is adjoined by existing housing to the north, west and also (with the development of Newcraighall North) to the south. The Newhailes House garden and designed landscape lies a considerable distance to the east, across the East Coast railway line.

50. Housing development on HSG 29 would change the setting of Brunstane House, transforming it from an area of countryside to a housing site. In this context, Brunstane House would then be surrounded by urban development. I accept that retaining open space adjacent to the boundary of the site with Brunstane House would mitigate the effect, but to a limited extent. The outlook from principal elevations would still be a housing site rather than countryside as at present, and there are clear views from the housing site to these principal elevations, even though there is a stone wall and mature vegetation beyond the western boundary of the site I therefore find that housing development on the site would have some adverse effect on the setting of Brunstane House, and would not preserve the setting entirely. Whilst this is not necessarily an overriding consideration, it weighs against the allocation of the site for housing to some extent.

51. As part of a comprehensive representation relating to the adverse effect of the proposed housing allocation on the green belt and heritage assets, biodiversity and sustainable transport (which are all examined either above or below) the National Trust for Scotland in particular refers to its interest in the house and policies of Newhailes, which were donated to the Trust in 1997. Notwithstanding recent development, it is considered that views out to the wider landscape remain unaffected, with Newhailes continuing to play a significant role in the green belt. This role is considered to be critical to maintaining the heritage and public enjoyment of this important national asset. It is submitted that housing development on the Brunstane site would erode the surroundings of Newhailes.

52. Newhailes House is a category A listed building set in a garden and designed landscape (included in the inventory). HES also expresses some concern about the effect on the setting, but considers that housing would be acceptable, subject to the layout being designed to avoid development immediately adjacent to the walled enclosure adjacent to the eastern boundary, which would have an adverse effect on its setting. From my site inspection I agree with this position and I am satisfied that the provision in the development

principles requiring a landscape framework to be provided to the boundary of the inventory site and the detailed siting and design of dwellings to respect views to Arthur's Seat from the grounds of Newhailes House are sufficient in this regard.

53. There are 2 scheduled monuments extending into the site, these being the Battle of Pinkie Scottish Camp, and a medieval moated site which was identified through a survey undertaken in 2001. There is no reference to these by HES, but the effect on these archaeological sites is raised by the Newcraighall and Brunstane Planning Group, as well as in other representations. There is no significant physical manifestation of these archaeological sites, but historical interpretation and their cultural relevance is nevertheless an important consideration. However, the intention through the site brief to retain open space extending to 3 hectares, covering the scheduled monuments, should allow this and minimise any adverse impact on the setting of these scheduled monuments.

54. There is little reference to these heritage interests in Volume 1 of the environmental report, and there is no reference at all in the extract relating to HSG 29 in Volume 2 (although there is some reference in a landscape context). However, Volume 1 does refer to mitigation in the form of retaining the open setting to the north and east of Brunstane House and scheduled monuments, and a setback and landscape framework being provided to the inventory site. These are reflected in the development principles for the site in the local development plan, which are further examined below. In terms of the inventory site and the scheduled monuments, I find that this mitigation is likely to be sufficient, but it would not in my view be entirely sufficient in preserving the setting of Brunstane House, which would be adversely affected to some extent.

Transport

Public transport and active travel

55. There are significant representations relating to the provisions made for transport with respect to this site. The first issue of concern is whether or not there is sufficient existing public transport provision in relation to this site, and if not whether such can be enhanced to an extent where this would accord with the terms of Policy 8 of SESplan. Policy 8a of SESplan indicates that development likely to generate significant travel demand should be directed to locations that support travel by public transport, foot and cycle. Public transport would be provided in the form of a new bus route through the site, from Milton Road East, extending through the site, across Newcraighall Road and into HSG 27, Newcraighall East, eventually extending to the Queen Margaret University Campus.

56. The housing site assessment summary for Brunstane in Appendix 2 of Volume 1 of the environmental report indicates that the site does not have good accessibility to public transport. The site assessment in Volume 2 states that diversion of bus services through the site would be required to provide sufficient enhancements to public transport. I therefore find that the feasibility of providing the proposed bus link, as required by the development principles, and the timing of its delivery, are important considerations relating to the sustainability of the site in transport terms.

57. The proposed bus route through the site extends significantly beyond the site boundary to the north, through woodland and an existing cemetery. Disruption to either may be of some concern, although the loss of woodland for the bus route would be fairly minimal. I note that this is considered feasible by the prospective developer of the site, and diagram 19 of the detailed submission to the council (2013) shows a proposed layout

for the junction with Milton Road East. From my site inspection this proposed junction would appear to be quite constrained for use by buses, and there is an existing pelican crossing opposite this proposed entrance. Careful consideration would need to be given to the proposed junction arrangement in a subsequent transport assessment.

58. The transport appraisal addendum seeks an increase of 8% in public transport modal share, taking the percentage to 49.1%. This is however dependent on the improvement of bus services in terms of access, capacity and increased frequency. All of these criteria are identified as having the highest negative scores in the assessment of interventions, where crucially operator agreement is needed, there is a cost implication and pump-priming may be required. I therefore find that there is considerable uncertainty in the feasibility of providing the required improvement in bus services, even if the access to Milton Road East proves feasible and can be delivered. There is a significant likelihood of the improvement in bus services falling well behind the occupation of new houses if there is no clear link between the two, resulting in a significant lack of sustainable transport provision. I acknowledge that the 2 railway stations of Brunstane and Newcraighall are accessible, but parts of the site east of the East Coast railway line (which passes through the centre of the site) are over 1 kilometre from these stations.

59. Providing active travel links within the site, and connecting to existing footpaths and cycleways, is however clearly feasible, and this is set out in the development principles, where access to the core path along the southern boundary of the site, and the John Muir Way to the north of the site would be particularly beneficial. The latter could be integrated into the new bus route which would cross the John Muir Way to the north of the site. These new active travel links could connect to (and encourage active travel to) the stations and existing (and proposed) bus links. Providing additional cycle parking at these stations would further assist with this. Increasing the mode share for public transport, promoting active travel and thus reducing congestion to a minimum would all contribute to minimising air pollution, which is also a concern raised within the representations.

60. In overall terms, whist there are significant uncertainties relating to public transport, I find that this would not justify the exclusion of the site from the local development plan. However, required mitigation with respect to such provision is further examined in the context of the development principles below.

Impact on the trunk and local road network

61. Cumulatively with the 2 Newcraighall sites, there would be a significant increase in traffic generation, and traffic flow, on the nearest road corridors. This is obviously less if public transport improvements are implemented, but it is significant in any event. Of particular concern are the A1, A720, A199 and A6095. The A6095 is predicted to have an increase in traffic flow of over 50% even if public transport interventions are successful. The size of the increase reflects the fact that the current level of traffic flow is low. There is also significant concern expressed in the representations about traffic on the A199 and its junction with the A1 (and other junctions), and about the effect of the proposed bus route through the site from Milton Road East.

62. There is expected to be a >5% increase on both the A1 and A720 city by pass. This is likely to have implications for the A1/Newcraighall Road junction. Milton Road East (A199) does not appear to have been assessed in terms of traffic increase, but this likely as a result of the proposed bus route from Milton Road East. There may also be some impact on the Old Craighall and Sheriffhall junctions on the A720. This may be relatively

minor but it is unknown, and it is noted in the transport appraisal that the >5% increase on the A720 would occur along its whole length, with individual sites having an impact on different parts of the road. It is nevertheless in overall terms a significant increase given existing congestion that already occurs at peak periods along the route.

63. Beyond the cumulative effects of other housing sites allocated in the proposed plan with Newcraighall and Brunstane, it is necessary to take into account cross boundary traffic generation. There are particular difficulties in this respect, since a study is still in progress to assess these effects, particularly on the trunk road network, and I refer to the findings in Issue 19 on this matter. There is particular concern in South East Edinburgh, with significant allocations in both East Lothian and Midlothian local (development) plans.

64. The transport appraisal refers to the need for a new junction with Milton Road East, which is likely to require traffic lights. Otherwise no specific road improvement interventions are identified. However, Transport Scotland has stated that the limited information about the cumulative effect of the new housing development proposals means that transport interventions which may be required for the trunk road network cannot be identified at this time. They may be needed for example with respect to the above referred to junctions on the A720, partly as a result of the effect of increased traffic flow from this particular site. Other improvements to the local road network, and associated junctions, may also be required beyond the need for a new junction with Milton Road East.

65. However, subject to identifying appropriate road improvements, particularly at junctions, I find that there is no evidence to suggest that there would be an adverse effect from the proposed housing (or retail and education development) on road and pedestrian safety. The design of the proposed new school and access for vehicles, cycles and pedestrians would require to maintain this position, but I am satisfied that this can be satisfactorily addressed through the development management process. Reducing congestion is however important in road safety terms, particularly to avoid tailbacks at junctions on to main carriageways, which could increase the risk of accidents.

66. Two main vehicular access points to the site (possibly also including secondary vehicular access points) would in my view be acceptable in terms of road safety. There may however be an issue relating to traffic through the site from Milton Road East to Newcraighall Road, and whether or not there should be a bus gate preventing through traffic apart from buses. Diagram 18 of the prospective developer's detailed submission to the council (2013) shows a primary route and main bus route through the site. Actual traffic management would need to be determined through a subsequent transport assessment.

67. In overall terms, I find that there are significant uncertainties with respect to the transport interventions that may be required to the trunk and local road network, in order to mitigate the effect of increased traffic generated from housing development on the site. On balance, however, in the context of the findings in Issue 19, I find that these uncertainties would not justify the exclusion of this site from the local development plan, when considered in the context of the revised policy framework recommended through Issues 19 and 21. A new transport policy would require proposals to address cumulative and cross boundary impacts, and Policy Del 1 and its supporting Supplementary Guidance would address the delivery of any required infrastructure. These matters and the required mitigation are further examined in the context of the development principles below.

Education Infrastructure

68. The revised education appraisal identifies improvements to the school infrastructure which are required to meet the education needs arising from the proposed allocation of HSG 29 together with HSG 27 Newcraighall East. There are 2 options for the non-denominational primary education requirements, the preferred option being a new 14 class primary school within the Brunstane site (to cater for both housing allocations), but a second option for a 2 class extension at Newcraighall Primary School, in the event that this site comes on stream before the Brunstane site, followed by a new primary school for Brunstane at a later time. Given the fact that planning permission in principle has already been granted for the larger part of HSG 27, and that the uncertainties relating to transport infrastructure on HSG 29 may require lengthy investigation and consultation, I find that the second option is more likely.

69. With respect to non-denominational secondary education, additional capacity would be required at Castlebrae High School to accommodate an estimated additional 255 pupils from the new sites in the local development plan. With respect to denominational education, management would give priority to baptised Roman Catholic pupils.

70. The council accepts that proposed housing will add to significant rising rolls and the need for additional school space. It considers that a lead in period of 3 years would allow for the planned provision of the required school infrastructure. The council accepts a potentially significant funding gap between the required works and the anticipated level of developer contributions. However, it states that recognised financial constraints can be addressed through forward and gap funding.

71. There is no technical or expert evidence to dispute the confidence of the council, as education authority, that identified education impacts can be appropriately addressed. Consequently, I find no basis to conclude that these matters justify deletion of the site. However, this does not negate the emphasis that should be placed on the appropriate and planned provision of this necessary infrastructure. In this context, the proposed plan lacks detail on how this constraint is to be addressed.

72. Given that the proposed mitigation applies to various sites in South East Edinburgh, the reporters consider that the education actions for South East Edinburgh should be brought together in Part 1 Section 5 of the plan. However, it is also important that these actions and the council's approach to timeous delivery are further clarified. This would require Supplementary Guidance to provide greater surety about the mechanisms, timing and funding of delivery. These matters are further addressed through Issue 21. I examine the need for reference to the delivery of education infrastructure in the development principles below.

Ground conditions relating to previous mining operations

73. The site is referred to in the representations as a high risk area resulting from previous coal mining activity. A further submission has been made on behalf of the Save Brunstane Greenbelt Campaign containing additional information with respect to the extent of this risk. In particular it is submitted that the site, together with the sites at Newcraighall North and East referred to above, has been designated a development high risk area by the Coal Authority as a result of the presence of near surface coal reserves and substantial historic shallow mine workings. It is submitted that this requires further examination in order determine whether development is appropriate on the site or should be subject to further

information to ensure that land stability measures are properly addressed. A number of potential environmental and safety hazards associated with developing former shallow coal mining areas have been identified in the submission. There is also a map showing the area designated as a development high risk area by the Coal Authority, which includes the majority of the Brunstane site.

74. The representation from the EDI Group Ltd includes a detailed submission relating to the development of this site for housing. This includes a technical assessment of feasibility with respect to historical mining operations in paragraphs 4.1 to 4.5, and diagram 10 gives an approximate illustration of the area which may require treatment before being built upon, and shows the location of a single disused mine shaft. It is further stated that it is intended to conduct a detailed desk study of geological and mining records, and in due course a thorough ground investigation using rotary drilling methods, which is the same process used at the consented Newcraighall North site. The sterilisation of coal reserves and whether or not coal should be extracted before housing development begins is a further matter to consider in the context of the coal reserves remaining on the site.

75. The environmental report does not assess the above issues relating to near surface coal reserves and historic shallow mine workings, with respect to this site, and I therefore consider that it is necessary to accept and examine the additional submission, so I have issued a further information request to the council, the prospective developer of the site and the coal authority. However, the environmental report is a matter for the council, which must satisfy itself that the strategic environmental assessment accords with the legislative requirements before adopting the plan. Whilst the environmental report informs the recommendations relating to the local development plan, this examination has no remit to make recommendations with respect to what is contained in the environmental report.

76. Following the further information request, the Coal Authority has responded to the effect that the definition of the “development high risk” area is intended to indicate where statutory consultation on planning applications is required. The allocation of housing sites in such areas is not unusual, nor is it unusual for site allocations on surface coal resources. The Brunstane site contains 13 recorded mine entries; recorded shallow coal workings; unrecorded shallow coal workings; thick coal outcrops and 3 reported surface hazards. The recorded mine entries are mostly located in two groups in the south west and north west of the site. The Coal Authority does not support the principle of new development over mine entries or within their respective zones of influence, even once they have been treated. This is a constraint which can impact on site layouts, site capacities and deliverability. However this is a large site and cumulatively the mine entries and respective zones of influence do not impact significantly on the developable area of the overall site.

77. The Coal Authority states that the recorded shallow coal workings are located in the south east and north east of the site. The unrecorded shallow coal workings are located across most of the site in the thick coal outcrops. The recorded shallow coal workings are at a depth where remediation measures are likely to be necessary. The unrecorded shallow coal workings are by nature more of an unknown factor, and site investigations by boreholes may be necessary to conclude whether or not remediation is necessary. The reported coal mining hazards have involved small holes appearing in the agricultural fields, and these are sited within the unrecorded shallow coal working areas. This would support the likelihood that the unrecorded shallow coal workings are likely to require remediation. This remediation could include stabilisation works, for example grouting, or it could include the removal of the remnant surface coal to create a new developable platform.

78. However, unstable land is one of many planning issues, and the Coal Authority considers that it should not outweigh other relevant material planning considerations. It is also suggested that the positive benefits of mining legacy risks being removed, remediated or mitigated through appropriate development proposals should be considered. The Coal Authority considers that new development can and frequently does reduce the impact of mining legacy on public safety, and detailed site investigations would be necessary before developing this site. However, it would not be normal practice for detailed intrusive site investigations to be undertaken prior to the site allocation process.

79. In overall terms, the Coal Authority does not consider the scale and nature of mining legacy risk on this site untypical of many proposed site allocations across the coalfield. Recorded and unrecorded shallow coal workings can be satisfactorily remediated and are not a constraint on the principle of development. The Coal Authority does not therefore support the removal of this site allocation on the basis of the mining legacy risks present.

80. I have noted the response on behalf of the EDI Group Ltd, which essentially at this stage relies on the findings of the technical assessment of feasibility with respect to historical mining operations, and on the response of the Coal Authority (which had been viewed prior to the response on behalf of the EDI Group Ltd). It is maintained that the mining legacy risks can be satisfactorily addressed and that the site should remain allocated for housing in the local development plan. However, I note that there is no objection to reference being made to the need to address ground conditions related to historical mining in the development principles. I have also noted a further response relating to the strategic environmental assessment, but as indicated above, I have no remit to make any recommendations relating to the content of the environmental report.

81. The council's response likewise maintains the view that the site should remain allocated for housing development, and uses the example of Newcraighall North to demonstrate that the specific type and quantum of mining legacy risks in this particular area do not rule out development. In addition, the council considers that the density range is sufficient to take into account any issues relating to ground instability resulting from historical coal mining operations. However, the council also states that an additional bullet point could be added to the list of development principles, to state that the master planning process should address issues of ground conditions arising from historical mining. In addition, the council notes the provisions of Scottish Planning Policy and SESplan, which relate to the safeguarding of mineral resources and in particular coal. However, proposals for extraction of coal during the plan period are not anticipated, and so the council considers that it would be inappropriate to establish this as a definite requirement for any particular site allocated in the plan.

82. A further response on behalf of the Save Brunstane Greenbelt Campaign highlights the fact that detailed investigations would be necessary before developing the site, and that unrecorded shallow mine workings are likely to require remediation; these both being matters raised on behalf of the Coal Authority. There is therefore uncertainty about the extent of coal mining legacy which requires mitigation in developing the site. Planning permission would still be required, and in the event that more detailed investigation showed the mining legacy to be too great, planning permission would be refused, notwithstanding the site being allocated in the plan. The concerns expressed in the submissions on behalf of the Save Brunstane Greenbelt Campaign are therefore safeguarded to this extent.

83. The key issue as far as allocation in the local development plan is the degree of uncertainty and whether or not this would be likely to prevent housing development on the

site. In this context, the mining legacy issue is therefore essentially more about the effectiveness of the site than the environmental implications. From the evidence available, I find that mitigation of the mining legacy is likely to be resolved within the indicative capacity range set out in Table 4 as it has been with respect to Newcraighall North. Evidence relating to other areas cannot be relied upon because these areas, and the relevant circumstances, may be significantly different.

84. Following on from all of the above, I find that further detailed investigation of the coal mining legacy constraints referred to above is required. However, I also find that the nature of these constraints is such that they do not on balance suggest that housing development would be inappropriate for this site. It is for the masterplan process to determine an appropriate layout of housing and open space which recognises these mining legacy constraints, and for this to be fully addressed at the development management stage. I am satisfied that housing development appears to be feasible within the overall indicative capacity range set out in Table 4.

85. In addition to the above, I note that paragraph 237 of Scottish Planning Policy states that local development plans should safeguard all workable mineral resources which are of economic or conservation value and ensure that these are not sterilised by other development. Since the site is located on a surface coal resource, the issue of sterilisation of mineral resources needs to be considered. Paragraph 239 states that (where possible) plans should secure extraction prior to permanent development above workable coal reserves. I find that whether or not the coal resource is economically viable for extraction would have to be determined through the masterplan process. The prior extraction of coal would also depend on the environmental implications for the surrounding area. These matters would need to be considered through the development management process, but do not justify the deletion of the housing site from the proposed plan.

86. The Coal Authority does not consider that any changes to the development principles or site brief are necessary, although it may be helpful to indicate in the proposed plan that the prior extraction of mineral resources needs to be considered and/or that site remediation in relation to mining legacy will be necessary. However, on the basis that the development principles are intended to indicate all the key elements that require to be addressed in the development of the site for housing, thus giving local development plan status to these key elements, I consider that it is actually necessary include both site remediation in relation to mining legacy and the consideration of prior extraction of minerals in this context within the development principles. This would be consistent with the other matters that are already included, or recommended through this examination.

Other infrastructure

87. Concern is expressed within the representations about the lack of health and other community facilities to cater for further housing development in the area, given that there is no commensurate improvement of existing facilities. There is however no evidence before me to quantify any deficiency within the existing health and community facilities, and there is a local shopping centre proposed within the Brunstane site through the development principles. It is open to the masterplan approach to consider the provision of new community as well as commercial facilities. In addition, appropriate provision for such facilities could be made through the development management process. This would be in the context of Policy Hou 10 of the local development plan, where any developer contributions would be considered in the context of Circular 3/2012.

88. Some concern is expressed within the representations about increasing flood risk on the site, and the the Scottish Environment Protection Agency has requested that reference to the requirement for a flood risk assessment, and appropriate mitigation, should be included in the development principles. This matter is further considered below. There is also concern about ensuring developer contributions relating to junction improvements, for example at Milton Road East and any improvement required to the junction of Newcraighall Road with the A1. This matter is also further considered below in connection with the development principles and is addressed within Issue 21 relating to Policy Del 1.

Conflict of interest and consultation

89. The conflict of interest referred to in the representations (relating to the ownership of the site) is a matter for the council and is not relevant to this examination. In any event, there is no evidence to suggest that the allocation of this site for housing in the proposed plan has followed a different approach to that adopted in the assessment of all of the proposed housing sites. The issues raised in the further submissions (examined above) about the compliance of the environmental report with the statutory provisions relating to the strategic environmental assessment of the local development plan are matters for the council to address, and are outwith the scope of this examination. It is for the council to ensure that the strategic environmental assessment has been properly carried out before adopting the local development plan.

90. There is concern expressed in the representations about the lack of consultation with respect to the second proposed plan, which introduced the allocation of Brunstane for housing development. However, I refer to the examination of conformity with the participation statement to the effect that such conformity has been demonstrated. The process relating to the second proposed plan included notification of people living close to the proposed additional housing sites, in accordance with paragraph 86 (4) of Circular 6/2013. I therefore find that consultation on the plan has in the circumstances been sufficient, and that no change to the local development plan is required in this context.

Development principles and site brief

91. Following on from Transport Scotland's concerns about the cumulative effect of large scale housing allocations on the trunk road network, which is also examined in Issue 19, I find that provision requires to be made for further transport assessments, which should include modelling of the cumulative effect of increased traffic flows on the trunk and local road network (taking into account all known proposed development and any potential cross boundary impacts). This should draw on the conclusions of the council's transport appraisal and further work being carried out to assess the wider cumulative and cross boundary impacts on the trunk road network.

92. The transport assessments should particularly relate to the Old Craighall and Sheriffhall junctions on the A720, and should identify any appropriate commensurate mitigation as a result of these transport assessments. Transport Scotland has requested consideration of mitigation for the Old Craighall junction and I find that provision is also required for the Sheriffhall junction which is similarly mentioned in the transport appraisal. Such provision is recommended in the general development principles under Issue 21, where it is related to the new Supplementary Guidance proposed through Policy Del 1. A reference to developer contributions towards both junction improvements is included. The Gilberstoun Link (under Proposal T8) is an active travel safeguard in the action programme, and so this is also included within the general development principles. A

requirement to address these general development principles is also recommended within the site specific development principles.

93. In addition to the above, transport assessments should identify any appropriate commensurate mitigation to the A1/Newcraighall Road junction which is referred to within the action programme, and to the junctions on the A199 with respect to the concerns expressed within the representations. Particular attention should be given to the new junction on Milton Road East and the management of additional traffic generation onto Milton Road East and Newcraighall Road. An associated improvement to pedestrian/cycle crossing facilities on Milton Road East and Newcraighall Road is also referred to in the action programme, and this should also be specifically referred to. An appropriate bullet point for this is included within the recommendations below.

94. Furthermore, a new bullet point requires to be included relating to the improvement (including access, routes, frequency, and the proposed new bus route) of bus services which may be required as a result of this proposed housing development. The bullet point should refer to appropriate consultation with service providers in order to identify what level of service improvement can be delivered in the plan period. This bullet point should cover the provisions in the action programme relating to the upgrading of bus stops on Milton Road East, and an increase in cycle parking facilities at Brunstane and Newcraighall stations. The third bullet point requiring a bus route to be formed linking Milton Road East with Newcraighall Road should be incorporated into this bullet point, and I provide appropriate text for the bullet point in the recommendations below.

95. The first and second bullet points relating to vehicular access are generally appropriate, but I find that the first bullet point should also incorporate an investigation as to whether or not a second crossing of the East Coast railway line should be provided in the interests of safety, as identified within the transport appraisal. In addition, and following the representation from Network Rail, there should be a statement to the effect that any crossings of the East Coast railway line should be on bridges over the railway line, and not at grade. With respect to the submission from the prospective developer that a third arrow should be provided showing access from HSG 26, I find that this would be appropriate, but that no reference to this in the text is necessary.

96. In general terms, I find that the fourth and fifth bullet points relating to new cycle and pedestrian links are appropriate, but in view of the concerns expressed in the representations about a possible adverse effect on the existing core paths along the boundaries of the site, these bullet points should be combined into a single bullet point setting out an overall approach to maintaining and enhancing the existing pedestrian and cycle links and the provision of new links. I provide an appropriate text for this in my recommendations below.

97. The bullet points covering the protection of the heritage interests adjacent to and within the site should take into account the concerns expressed on behalf of Historic Environment Scotland, Scottish Natural Heritage, Architectural Heritage Society of Scotland, National Trust for Scotland and the local community. In particular, there should be no quantification of the extent of open space for safeguarding the setting of Brunstane House and the scheduled monuments (although I am satisfied that an indicative representation of this on the diagram can be retained as existing), and an indicative open space buffer should be added along the boundary of the site with the Newhailes House garden and designed landscape. This would also have the effect of emphasising the perception of distinction between Edinburgh and Musselburgh in terms of the

representations on this matter. I consider that half the width of the area shown under the power lines would be appropriate. I provide an appropriate text for the protection of heritage interests in my recommendations below.

98. In accordance with the representation on behalf of the Scottish Environment Protection Agency, and in order to be consistent with respect to all other proposed housing allocations where a risk of flooding has been identified, I find that a requirement for a flood risk assessment and mitigation measures in relation to sustainable urban drainage should be incorporated into the development principles and that therefore a new bullet point should be added in relation to this. However, it is not necessary to include any reference to this in Table 4 because the stated capacity range is indicative only. With respect to the proposed school, reference to this in the development principles will suffice.

99. I find that further detailed investigation of the coal mining legacy constraints is required and that it is necessary include site remediation in relation to these mining legacy constraints, and the consideration of prior extraction of minerals in the context of Scottish Planning Policy, within the development principles. I therefore provide an appropriate form of wording for this within the recommendations below.

100. Further consideration is given through Issue 21 to the requirement for Supplementary Guidance relating to the delivery of education infrastructure. In this context, further detail is considered to be necessary within the development principles, in order to give confidence to the local community and others that the schools capacity issue will be addressed and that the proposed plan is not promoting development in South East Edinburgh that will place an unacceptable strain on existing schools. General development principles are therefore recommended on this matter through Issue 21, and my recommendations include a cross reference to these in the site specific development principles relating to this site.

101. With respect to the timing of new road improvements, public transport, education and other infrastructure, I find that there should be a statement within the development principles to the effect that development should only progress subject to sufficient infrastructure already being available or where it is demonstrated that it can be delivered at the appropriate time. Such a statement is recommended in the proposed general development principles and Policy Del 1 under Issue 21.

Size of the site and scale of the proposed development

102. There are representations to the effect that if the site is retained within the plan, the development area should be reduced in size and the indicative capacity for housing on the site should be reduced. In addition, environmental and infrastructure constraints together with necessary changes to the development principles referred to above may reduce the overall capacity of the site for development. The council has used its standard density range as identified in Volume 1 of the environmental report and multiplied this by the developable area of the site (from the assessment in Volume 2). I find that there is no reason in general terms for any exceptions to the standard density range on the subject site, but that the developable areas need to be further examined.

103. Subject to providing for active travel, open space (particularly in order to protect the heritage interests adjoining and within the site) and infrastructure in the development principles referred to above, I find that it is appropriate to make full use of the site and maximise the contribution that it can make to the programmed housing land supply. This is particularly so given the shortfall in the programmed housing land supply identified through

Issue 5. None of these matters point to any requirement for a significant reduction in either the area or the capacity of the site.

104. There is particular mention within the representations of the area to the east of the East Coast railway line, to the effect that there would be particular merit in retaining this area as agricultural land and as part of the green belt. Brunstane Burn is considered to be essential to wildlife, and this would maintain the integrity of the Newhailes House garden and designed landscape. It is considered that this would also reduce the burden on utilities and roads in particular. I agree that there is some merit in these arguments, and furthermore that the railway line would provide a defensible green belt boundary (subject to further landscaping), and would also prevent the segregation of the site into 2 parts.

105. However, and particularly with a second crossing of the railway line (and possibly additional pedestrian/cycle crossings), I find that the integration of the whole of the proposed new housing within the urban area is feasible, and that a buffer as described above would be sufficient in order to maintain the integrity of the Newhailes House garden and designed landscape. There would in my view be little value in retaining the area to the east of the East Coast railway line as green belt on its own, and its value as agricultural land or open space would be fairly limited. It would be better to maximise the use of the land for housing but at the same time ensure sufficient open space throughout the site, together with appropriate access into adjacent areas, to provide an acceptable scheme in environmental terms. I therefore find that the overall size of the site, and its indicative capacity, is acceptable, and that it would in the circumstances be inappropriate to reduce either of these, which would reduce the site's contribution to the housing land requirement, without providing a significantly better scheme in environmental terms.

Overall conclusion

106. I conclude in overall terms that the development of this site for housing would make a significant contribution to the housing land requirement. Although there would be some adverse landscape impact, this would not be to an extent which would significantly undermine the objectives of the green belt. Any further coalescence between Edinburgh and Musselburgh would also not undermine green belt objectives. Neither of these matters would in the circumstances justify the exclusion of the site from the proposed plan.

107. There would be some adverse impact on the setting of Brunstane House, but this is not sufficient to outweigh the significant contribution to the housing land requirement, and appropriate mitigation would reduce the impact and protect the other heritage interests. Housing would otherwise be acceptable in environmental terms. I am satisfied that sufficient infrastructure is capable of being provided within the policy context as set out elsewhere in this report through Issues 19 and 21.

108. All of the above is however subject to the modification of the development principles and site brief in the terms set out in the recommendations below, including the general development principles recommended through Issue 21. I conclude that (subject to such modifications) HSG 29 (Brunstane) should remain designated in the plan for housing development as shown on the proposals map.

Reporter's recommendations:

Modify the proposed plan by:

1. Revising the estimated capacity in Table 4 for Newcraighall North (HSG 26) to 220 houses.

2. Adding new bullet points to the development principles for Newcraighall East (HSG 27) as follows:

   - address the relevant General Development Principles on transport and education for South East Edinburgh set out in paragraph 118 to 120 above.

   - new woodland should be provided along the southern boundary of the site as shown on the diagram.

   - the finalised site capacity, design and layout should be informed by an adequate flood risk assessment.

3. Extending the woodland on the diagram for Newcraighall East (HSG 27) along the whole of the southern boundary of the site.

4. Revising the bullet points within the development principles for Brunstane (HSG 29) as follows:

   - address the relevant General Development Principles on transport and education for South East Edinburgh set out in paragraphs 118 to 120 above.

   - transport assessments should identify any appropriate commensurate mitigation which may be required with respect to the A1/Newcraighall Road junction and to the junctions on the A199, taking into account any cumulative impact with traffic from other development sites. Particular attention should be given to the proposed new junction on Milton Road East, and the management of additional traffic generation onto Milton Road East and Newcraighall Road including associated improvements to pedestrian and cycle crossing facilities.

   - the site layout should allow for the proposed new bus route to be formed linking Milton Road East with Newcraighall Road. Appropriate consultation with service providers should take place in order to identify the bus service improvements which can be undertaken in the plan period, taking into account access, routes and frequency of service, and including the proposed new bus route. Proposals should provide for an appropriate upgrading of existing bus stops and an increase in cycle parking facilities at Brunstane and Newcraighall stations.

   - vehicular access should be taken from Milton Road East and Newcraighall Road, forming a new vehicular crossing over the East Coast railway line. The potential for a new pedestrian/cycle bridge within the eastern part of the site should be investigated, together with an investigation as to whether or not a second vehicular crossing of the East Coast railway line should be provided in the interests of safety, as identified within the transport appraisal. Any crossings of the East Coast railway line should be on bridges over the railway line, and not at grade.

- no vehicular access should be taken from the Gilberstoun Area.

- opportunity to enhance existing core and other paths along the boundaries of the site, and in particular the Brunstane Burn Core Path (John Muir Way) on the northern boundary of the site including pedestrian crossing where vehicular access meets the path. New multi-user path links should be formed to the Innocent Railway Core Path, Brunstane Burn Core Path and the disused railway line to the north of Newcraighall, with path connections also to housing at Gilberstoun, Newcraighall and Brunstane railway station.

- the impact on the setting of Brunstane House should be minimised through the appropriate design and layout of housing on the site, including the provision of sufficient open space and landscaping to the north and east as shown on the diagram. The extent of the open space is indicative only and the exact area will depend on the design and layout of housing on the site. Sufficient open space should also be similarly provided in order to retain an open setting for the two scheduled monuments of Brunstane Moated Site and Brunstane Enclosure, also meeting a large greenspace deficiency to the south west of the site.

- a landscape framework should be provided to the boundary of the Newhailes House garden and designed landscape inventory site, with a buffer as shown on the diagram (again indicative and depending on the design and layout of housing on the site) and the detailed siting and design of dwellings should respect views to Arthur's Seat from the grounds of Newhailes House.

- management proposals should have regard to the above stated historic environment assets. Historic Environment Scotland should be consulted on these matters when development proposals are being prepared.

- establish statutory safeguards to overhead power lines to the north and south of the site. Design principles should seek to integrate overhead power lines with site layout. To the south, allotment provision should complement consented allotments at Newcraighall North. To the north, power line way leave should be designed to provide for semi natural greenspace and habitat connectivity with informal recreation.

- expand grassland habitat (under pylons) and provide woodland connectivity across the site.

- streets and open spaces should be designed to benefit from views to the coast to the north, Arthur's Seat to the west and Pentland Hills to the south west.

- opportunity to create a community focal point including a new primary school and local centre.

- proposals for housing (including the finalised site capacity, design and layout), the school, and any other uses provided on the site, should be informed by an adequate flood risk assessment. Enhanced sustainable urban drainage will be required as appropriate to address current/future water quality pressures and to ensure no detrimental impacts to the recently designated bathing waters at Fishers Row.

- proposals should fully address any necessary site remediation in relation to mining legacy constraints, and should take account of any need for prior extraction of minerals in the context of Scottish Planning Policy.

5. Including a third arrow on the diagram for Brunstane (HSG 29) showing vehicular access from HSG 26, in accordance with the submission by the prospective developer.

6. Including a landscape buffer on the diagram for Brunstane (HSG 29) (approximately equivalent to half the width of the buffer under the electricity transmission lines) along the boundary of the site with the Newhailes House garden and designed Landscape.

Issue 10 Appendix A – HSG 29 Brunstane			
0086	D & A Woodburn	0960	Gilmour Brown
0147	Martin Stobbart	0961	Chloe Walker
0154	John O'Brien	0962	Mariane Gibson Brown
0171	K Beertram	0965	Gordon Eldrett
0261	Janet Brown	0966	Betsy Thomson
0286	Susan Martin	0967	Harry Kiernan
0369	Anthony Kent	0968	Irene Spanswick
0378	Barry Turner	0969	D Bruton
0388	Pauline Cowan	0970	Thomas Baxter
0390	Angela Wrapson	0971	Sheila Baxter
0397	Elspeth Fleming	0972	Paul Thomson-Bernard
0406	Carol Richardson	0981	Mark Baillie
0407	Alaine Walters	0982	Eddington Drew
0411	Adrian Tulloch	0995	Peter Bell
0412	Jane Tulloch	0999	Sandra Swinton
0414	Peter McGauchran	1000	J H Laidlaw
0415	Janet Brodie	1001	J A Kowalski
0416	Fiona Henderson	1003	R R Kowalski
0423	John Crombie	1028	Douglas Latto
0424	Jessie Crombie	1049	G Harkin
0425	Mr & Mrs Vaughan	1054	John Dalgleish
0430	Vivian Murphy	1058	Campbell Foggo
0435	Neil Kynaston	1063	Elizabeth McKinnon
0436	Nicholas Ross	1065	Lauren O' Brien
0440	Margaret Ford	1068	Janet Young
0442	Jane Stafford	1071	Frank Young
0444	Laurence Roscoe	1072	T Webb
0445	David Woodburn	1075	D J Young
0446	Alastair Hare	1077	Niall O' Brien
0449	Maria Gray	1078	Allan Turner
0451	Pamela Mackay	1079	Dorothy Anderson
0452	Catherine Robertson	1080	Nicky Turner
0453	Keith Robson	1081	Charles Thomson
0454	Marion Pauline Gray	1082	Duncan Foggo
0455	G Boyd	1083	David Honeyman Brown
0456	Krista Black	1084	Greta Tiffney
0457	Laurence Winram	1086	Marie O' Brien
0458	Steven Black	1088	Alan Murphy
0459	Doreen Hare	1090	Connor Walker
0462	Joy Stockley	1092	Ian Leslie
0472	Jessica Gioia	1093	Jamie Leslie
0473	David Bain	1095	Caroline Leslie
0476	W Devine	1096	George Leslie
0477	Gary Williamson	1099	Steve Hay
0479	Alastair Hamley	1104	Linda McKay
0483	William Mould	1106	S & A Yeaman
0484	Patricia Mould	1108	Pamela Morrison
0488	Allan Cameron	1110	Eilish Garland
0493	William Jansen	1112	Sandra Wallace
0498	Ian Millar	1114	Elizabeth Brown

0499	C Todd
0500	R Todd
0509	J Meldrum
0512	James Crombie
0513	Euan Thomson
0514	Fiona Thomson
0515	Nicola Thomson
0537	Anne Thomson
0540	Frank Sibbald
0541	Joyce Sibbald
0544	Denise Marr
0551	John Speedman
0557	James Turnbull
0564	John Mccarron
0582	Donald Ball
0590	Damian Rowell
0591	William McKay
0592	S Rahimi-rizi
0596	Jennifer Whitehouse
0600	Sheena Cramb
0602	G A M Johnstone
0603	Jacqueline Griffin
0604	Jamie Griffin
0610	G A Dickerson
0611	Gail Simpson
0613	Pauline Hamilton
0614	B P Wilson
0615	William Hamilton
0616	Robert Graeme Arnott
0617	Julie Wilson
0619	Paul Arnott
0620	R G Arnott
0621	Janice Arnott
0629	Gavin Fairbairn
0630	Helen Knox
0634	Michael R Richards
0635	David Gordon
0639	Ian Marr
0644	Donald Thomson
0647	Andrew Shiels
0650	M G T Falconer
0656	Sandra O'Binnie
0665	Barbara McLuckie
0678	Doherty
0681	Lisa McCallum
0682	Rossalind McCallum
0683	Scott McCallum
0684	S McCallum
0702	Sammy Hyett
0704	Kyle McLennan
0708	Neil Cochran
0709	Jennifer Cochran
1128	George Maxwell
1130	Audrey Johnstone
1131	Malcolm Morrison
1132	Megan McIntosh
1134	Elaine Wilson
1135	Sade Bankole
1137	Lynn Aitchison
1138	Jennifer Jones
1140	Diana Cairns
1142	Alexander McKay
1143	F N Ford
1147	D Creelie
1328	Margaret Steel
1355	Evelyn Jamieson
1356	Vincent Holliean
1357	John Bishop
1358	Bruce Murray
1359	Norman Brown
1360	Joyce Brennan
1361	David Adam
1362	D Skirving
1363	Gwenan Sedgeworth
1364	Judith Smith
1365	James Brennan
1366	George Maxwell
1367	Catherine Jansen
1368	Natalie Welsh
1369	Margaret Ramsay
1370	M H B Ramsay
1371	Alexander Foster
1372	Julie Foster
1373	David Morham
1374	Karen Morham
1375	Elizabeth Morham
1376	Janet Brown
1377	Nichola Spence Fraser
1378	Brian Bradley
1379	Mike Cheesbrough
1380	Janet Beveridge
1381	Lindsay Sedgeworth
1382	Richard Alastair Scott
1383	Sandra Craig
1384	Marjory Lamb
1385	Katherine Robertson
1386	Kenneth J McKenzie
1387	N McQueen
1388	Helen Kiernan
1389	Paul McGhee
1390	John Colledge
1391	Mary Sprott
1392	Angela Mackay
1393	Neil McDonald

0710	Ian Caldwell
0712	Yvonne Caldwell
0713	K Inness
0718	Margaret Mckinley
0719	Thomas Ford
0724	Grace Buckingham
0730	Lee Dickson
0735	Hayley Johnson
0739	Ernest M. Whiteoak
0745	Celia Butterworth
0750	Paul Dunning
0751	Laura Doyle
0753	Steven Carlin
0754	Amanda Carlin
0756	Melanie Sangster
0757	Marcus Sangster
0758	Sheila Thomson
0759	Janie Buchanan
0760	Imran Akran
0761	Sharon Mackenzie
0762	Louise Newall
0763	Nigel Finlam
0765	Andrew Anderson
0767	Irvine Allan
0772	Kenny McGregor
0776	G Ali
0777	Allan Williams
0778	Richard Skeldon
0779	Rhiannon Naismith
0780	Jasmine Ghazantar
0781	Isabel Armstrong
0782	Ralph Hannay
0783	Elizabeth Telford
0785	N Hannay
0787	Charles Roper
0790	Doreen Douglas
0791	Yvonne Thabet
0792	David Gail
0793	Mark Noble
0796	Sahra Noble
0797	David McKinnon
0798	Norma Fisher
0800	Wiiliam McGregor
0801	John Nesbit
0802	William Tait
0803	Shazia Akram
0804	Ronald McDonald
0805	Jane McDonald
0806	FE McDonald
0807	Tracey McGregor
0808	Michael Wingate
0809	Antonio Mozzarello
1395	Ian Small
1396	Denise Colledge
1397	David Grant
1398	Anne Blunden
1399	Brian Montgomery
1400	J Black
1401	I F Smith
1402	D Dorian-Smith
1403	Laura Nolan
1404	Kevin Nolan
1405	Shannon Nolan
1406	Kathleen Nolan
1408	Joseph McVey
1409	Neil Martin
1410	Catherine Nolan
1411	Moira Nolan
1413	Stephen Lorimer
1416	Charles Smith
1417	Sheila C Smith
1419	Robert Bruce Powell
1420	Ronald Duncan Douglas
1421	Sylvia Nesbit
1422	Theresa Ogg
1423	Iain Abbot
1424	Fiona Johnston
1425	Douglas Mair
1426	Ishbel Mair
1427	Madeleine Latto
1429	Joseph Arnott
1431	Susan Graham
1432	Grahame Robertson
1434	William Noble
1435	Ian Greep
1437	Evelyn Saunders
1480	James Thomson
1481	Eva Thomson
1482	Wendy Bain
1485	Brenda Molony
1495	Sheila Bullen
1496	Kenneth Bullen
1535	Karen Irving
1683	Lynsey Orbegozo
1687	Patricia Anne Rodger
1979	Sean Hignett
1980	Gillian Anderson
1981	Stephen Griffin
1983	Caroline De Jonge
1988	Helen Lumsden
1989	Peter Wraith
2001	Shelagh Rodger
2003	Frances Wraith
2009	Ursula Wright

0810	Victoria Gibson	2012	Gareth Thomson
0811	Marlene Tait	2015	Carol Mathieson
0812	Ann Noble	2030	Richard Wright
0813	Ross	2039	Elisabeth McCulloch
0814	Callum Nesbit	2065	Kris Griffiths
0815	Charlie Philp	2069	Alex Lumsden
0816	Christine Philp	2084	Lynn Stewart
0817	Alister Hadden	2125	Martijn De Jonge
0825	Gordon Santana	2159	Claire Duncanson
0831	Stephen Quinn	2160	Mirelle Allan-Wheeler
0878	Helen MacNeath	2164	Chris Hewitt
0891	June Doyle	2181	Raymond Faccenda
0899	David Smith	2182	Frances Faccenda
0901	Kim Waugh	2187	L Davies
0904	Kevin Doyle	2190	Elizabeth Stuart
0905	April Fyfe	2205	Janette Allan
0906	Alan Waugh	2209	Katie Weaver
0907	Mohammed Akram	2215	Tommy Taylor
0908	Kalsoom Akram	2221	John Scott
0909	Margo Stewart	2225	Jonathon Ash
0911	Kenneth Stewart	2226	Ewan Sinclair
0913	Billy Mckinley	2234	Rachel Everitt
0914	Billy Mckinley Jnr	2247	Ben McLeish
0915	McNab	2264	Catherine Carnegie
0916	Michael Taylor	2294	Ian Gardner
0917	L P McPhillips	2295	Elaine Dobbie
0918	Alan J Yeaman	2336	Michael James McGrath
0920	Shiela Shillitto	2401	Helena Forses-Scott
0921	Nicole Noble	2403	Victoria Allan
0923	Dawn Noble	2423	Stephen Foster
0924	P Dunlop	2436	Linda Armstrong
0926	Catherine Thomson	2438	Susan Davidson
0927	Lesley Boubert	2447	David Stillie
0938	Carla Bichan	2457	Jacqueline Ritchie
0939	Lynn Panton	2478	Patsy King
0940	Linda Dobson	2481	Fiona King
0942	Alan Henderson	2485	Hazel Hewitt
0943	Joan Henderson	2498	Alexander Gilroy
0945	Sheila Fisher	2501	Mark McLean
0946	Melvyn Lee	2515	Jonathon Wraight
0947	Maureen Harkness	2521	Martin Kelly
0948	Agnes Foster	2522	James Hurford
0949	Yvonne Speedman	2535	I B Hansen
0951	Maureen Scott	2568	Stephen Hawkins
0952	Frances Whiteoak	2581	Eric McCabe
0953	Thomas Tiffney	2613	Douglas Greatorex
0954	Elizabeth Turner	2646	David King
0955	Fay Foggo	2647	Gillian Dunn
0956	Pam Denholm	2659	Elaine Gilroy
0957	Gail Brown	2665	Robert Tait
0958	Norma Brown	2666	Catriona Salvona
0959	A McCauley	2701	Portobello Heritage Trust

Issue 11	**New Greenfield Proposals – North West**	
Development plan reference:	**HSG 32 Builyeon Road** **HSG 33 South Scotstoun** **HSG 34 Dalmeny** **Part 1 Section 3 Table 4 pages 25-27** **Site Brief pages 70-71**	**Reporter:** Lance Guilford

Body or person(s) submitting a representation raising the issue (including reference number):

51 individuals seeking removal of HSG 32 Builyeon Road (see Issue 11 Appendix A)

55 individuals seeking removal of HSG 33 South Scotstoun (see Issue 11 Appendix B)

27 individuals seeking removal of HSG 34 Dalmeny (see Issue 11 Appendix C)

21 individuals seeking removal of HSG 32 & 33 (see Issue 11 Appendix D)

39 individuals seeking removal of HSG 32, 33 & 34 (see Issue 11 Appendix E)

Organisations, elected representatives and individuals other than those in Appendices A – E

0061 Edward Crockford
0081 David Griffiths
0114 R.D.R MacSorley
0248 Martin Ewart
0254 Hopetoun Estate Trust
0271 Merril Wallen
0355 Eric Douglas King
0363 John Halliday
0478 Helen Nickson
0646 Doug Tait
0828 Network Rail
0696 The Bowlby Trust
0933 Nicholas Gracie Carmichael
1012 John Roy McIvor
1033 Robert Robertson
1020 Varney Residents Association
1498 Edmund Saunders
1499 Rebecca Saunders
1589 Edward Kelly
1594 Richard Carvel
1627 Linn Mill Resident Association 1689 Susan MacNeil
1800 Lorraine Milson
1961 Kirkliston Community Council
2019 Garry Croy
2020 Marion Croy
2027 Robert Jeffrey
2048 Duncan Smith
2070 Diane Job
2088 Scottish Government
2099 Kate Corliss
2126 Cockburn Association
2130 Colin Keir MSP
2153 Callum Egan
2214 Stuart MacNeil
2248 Taylor Wimpey
2308 Dolina Gorman
2393 Juliette Summers
2411 Steven Lane
2432 William Tunnell
2433 John Rough
2451 Linda Lane
2480 Rosebery Estates Partnership
2491 James MacGregor
2527 Alison Hobbs
2592 John Mucklow
2612 Craig Mackenzie
2650 Victor Stevenson
2652 Vera Stevenson
2697 Scottish Natural Heritage
2705 Queensferry Ambition
2707 Queensferry District Community Council

Provision of the development plan to which the issue relates:	These provisions of the Plan deal with the proposals for new housing allocations (HSG 32 Builyeon Road, HSG 33 South Scotstoun, and HSG 34 Dalmeny) in Queensferry.

Planning authority's summary of the representation(s):

CONTEXT

The context of the approved SDP and its Supplementary Guidance meant that the Second Proposed Plan has had to find additional sites, but has been able to do so partly on large sites outwith the West and South East Strategic Development Areas. The sites in North West Edinburgh include;

- HSG 32 Builyeon Road, Queensferry
- HSG 33 South Scotstoun, Queensferry
- HSG 34 Dalmeny

Representations seeking removal of HSG 32 Builyeon Road

Seek removal of HSG 32 on the grounds of one or more of the reasons listed below:

- **Site Selection** - Queensferry should not be a preferred area as it is not located within the city boundary. Housing growth should link sustainably to business growths and jobs. Proposal does not comply with section 3 criterion in the Plan. Impact on Queensferry. Agricultural land. Loss of clear boundaries between South Queensferry and Dalmeny.
- **Transport Infrastructure** - The Environmental Report Second Revision Volume 2 identifies the poor public transport access to Queensferry. Concern that the proposal will result in a 'commuter town'. Considers that the infrastructure is currently inadequate with regards to walking routes, crossing points, the condition of A904 which will worsen with the opening up of the new bridge, congestion on Builyeon Road, Scotstoun Avenue, and Society Road and parking at Dalmeny Station. The Transport Appraisal overestimates bus use and underestimates train use. The opening of Gogar Station will increase capacity pressure on Dalmeny Railway Station and additional capacity on the Fife Circular is required and car parking capacity at Dalmeny Station as well as bus route coverage and provision of night buses. A strategic review is necessary to access impacts of 2500 new homes, world heritage status and Queensferry crossing.
- **School Infrastructure** - Concerned about the location of the new primary school due to air pollution. Unclear implications if extension to Queensferry High School will encompass new developments and whether it will be built on existing playing fields. Suggests a new high school in a central location should be considered. No mention of nursery provision.
- **Community facilities** - There is need to preserve the area and improve existing facilities: nursing home, sheltered housing and community hall, Health care facilities and leisure centres.
- **Impact on the character of Queensferry** - The conservation area and setting of listed buildings.
- **A Strategy for Queensferry** - The development will impact on tourism industry. There is no economic plan or strategy provided for Queensferry and the Plan acknowledges limited opportunities for commercial uses. Provision of local employment for future residents should be a priority. The proposal will result in a 'commuter town'.
- **Developer Contributions** - The funding mechanism for new recreational facilities is not clear. No confidence that CEC will deliver or be in receipt of any developer contributions to the infrastructure.

- **Insufficient consultation** - The Plan process is undemocratic, no consultation has taken place and the process has been deliberately made cumbersome in that it discourages individuals and local interest groups from submitting representations, contrary to the guidance set out in Planning Advice Note 81, the Plan is not Disability Discrimination Act compliant, in terms of its format.
- **Consultation with West Lothian** - Concerned that there hasn't been any consultation with West Lothian.
- **Sewage and Drainage** - Capacity issue at Queensferry Waste Water Treatment Plant.

(2130 Colin Keir MSP; 2707 Queensferry District Community Council and 46 individuals listed in Issue 11 Appendix A)

- Supports allocation of HSG 32 Builyeon Road. **(0254 Hopetoun Estate Trust; 0696 The Bowlby Trust; 2126 Cockburn Association)**

Representations opposed to HSG 32 Builyeon Road in current form and seeking its removal and/or change

- Remove the proposal from the Plan or reduce the size. **(0121 Richard & Catherine Oakley; 0333 Andrea Robertson; 0474 Kim Venton; 0574 Joan Proven; 0668 Karen Balanowski; 1594 Richard Carvel; 2433 John Rough)**
- Reduce the capacity of housing and include additional facilities and amenity space. **(0495 David and Violet Donnelly)**
- The introduction of flammable fuels in a residential area will present a fire hazard. **(1033 Robert Robertson)**
- The 'opportunity' to provide pedestrian/cycle bridge to Ferrymuir and further east must be changed to state 'hard requirement' as this bridge is necessary to support new housing. **(2048 Duncan Smith)**
- Believes the scale of HSG 32 and HSG 33 and potential cumulative transport impact has not been appropriately addressed. Intervention on the A90 may be required to mitigate effects of generated traffic. Full account of impact and mitigation should be included in the Plan and Action Programme to inform developers of likely requirements. **(2088 Scottish Government)**
- Provision of new greenspace with trees within the site to meet Council's Greenspace Standards and to maintain view to the Pentland Hills and if feasible, to the new road bridge. **(2126 Cockburn Association)**
- Existing woodland at Stoneyflats should be identified and protected as it makes a positive contribution to the character, a loss of woodland would not be welcome. Plan should identify alternative pedestrian/cycle routes than Echline Terrace and Long crook in order to ensure amenity and safety to residents is not harmed, adequate traffic calming and road safety measures should be implemented in advance of development. Suggests restricting the access of contractors to the site to protect resident amenity. **(2027 Robert Jeffrey)**
- While our earlier comments on HSG 32 Builyeon Road have informed site requirements in the Second Proposed Plan, we wish to add to those with a recommendation that access provision within the boundary woodland at this site should be extended westwards to facilitate a link between this site and HSG 1 to the west of Springfield. This would provide an alternative peripheral route to Dalmeny Station for both existing and new developments in this part of South Queensferry. This continuation, along with a more clearly articulated connection through

Ferrymuir would establish a strong edge to the new settlement boundary. As we are recommending that the southern edge of these sites is considered together, we also recommend that the woodland boundary at HSG 32 should have similar minimum width requirements to those set out for HSG 33 South Scotstoun. **(2697 Scottish Natural Heritage)**

Representations seeking removal of HSG 33 South Scotstoun

Seek removal of HSG 33 on the grounds of one or more of the reasons listed below:

- **Site Selection -** Queensferry should not be a preferred area as it is not located within the city boundary. Housing growth should link sustainably to business growths and jobs. Proposal does not comply with section 3 criterion in Plan. Impact on Queensferry. Agricultural land. Loss of clear boundaries between South Queensferry and Dalmeny.
- **Transport Infrastructure** – The Environmental Report Second Revision Volume 2 identifies the poor public transport access to Queensferry. Concerned that the proposal will result in a 'commuter town'. Considers that infrastructure is currently inadequate with regards to walking routes, crossing points, condition of A904 which will worsen with opening of new bridge, congestion on Builyeon Road, Scotstoun Avenue, and Society Road and parking at Dalmeny Station. The Transport Appraisal overestimates bus use and underestimates train use. The opening of Gogar Station will increase capacity pressure on Dalmeny Railway Station and additional capacity on the Fife Circular is required and car parking capacity at Dalmeny Station as well as bus route coverage and provision of night buses. A strategic review is necessary to access impacts of 2500 new homes, world heritage status and Queensferry crossing.
- **School Infrastructure** - Concerned about the location of the new primary school due to air pollution. Unclear implications if extension to Queensferry High School extend will encompass new developments and whether it will be built on existing playing fields. Suggests a new high school in a central location should be considered. No mention of nursery provision.
- **Community facilities** – there is need to preserve the area and improve existing facilities: nursing home, sheltered housing and community hall, Health care facilities and leisure centres.
- **Impact on the character of Queensferry** - The conservation area and setting of listed buildings.
- **A Strategy for Queensferry** - The development will impact on tourism industry. There is no economic plan or strategy provided for Queensferry and the Plan acknowledges limited opportunities for commercial uses. Provision of local employment for future residents should be a priority. The proposal will result in a 'commuter town'.
- **Developer Contributions** - The funding mechanism for new recreational facilities is not clear. No confidence that the Council will deliver or be in receipt of any developer contributions to the infrastructure.
- **Insufficient consultation** - The Plan process is undemocratic, no consultation has taken place and the process has been deliberately made cumbersome in that it discourages individuals and local interest groups from submitting representations, contrary to the guidance set out in Planning Advice Note 81, the Plan is not Disability Discrimination Act compliant, in terms of its format.
- **Consultation with West Lothian** - Concerned that there hasn't been any

consultation with West Lothian.

- **Sewage and Drainage** - Capacity issue at Queensferry Waste Water Treatment Plant

(2130 Colin Keir MSP; 2707 Queensferry District Community Council; and 55 individuals listed in Issue 11 Appendix B)

Supports allocation of HSG 33

- Supports allocation of HSG 33 South Scotstoun. **(2126 Cockburn Association; 2248 Taylor Wimpey; 2480 Rosebery Estates Partnership)**

Representations opposed to HSG 33 South Scotstoun in current form and seeking its removal and/or change

- Objects to proposal on grounds of above, however if proposal is to remain include green spaces to the south of existing houses on Provost Milne Grove to comply with Environmental Report. States that proposal by Taylor Wimpey was more preferable due to reduced house numbers and retention of green space. **(0333 Andrea Robertson; 0474 Kim Venton; 0574 Joan Proven; 1594 Richard Carvel; 2214 Stuart MacNeill; 2433 John Rough; 2153 Callum Egan; 2308 Dolina Gorman)**
- Objects to proposal on grounds of above, however if proposal is to remain proposes a new tree line to cover full length of Provost Milne Grove as there is concern regarding increase in vehicular and pedestrian footfall which harms residents privacy. **(0478 Helen Nickson)**
- Objects on the grounds that Scotstoun Avenue is severely congested and there are no pavements joining main road. **(0933 Nicholas Gracie Carmichael)**
- Remove vehicular access, reduce number of houses provided, include green space and retain existing trees. **(1498 Edmund Saunders; 1499 Rebecca Saunders; 2019 Garry Croy; 2020 Marion Croy)**
- Believes the scale of HSG 32 and HSG 33 and potential cumulative transport impact has not been appropriately addressed. Intervention on the A90 may be required to mitigate effects of generated traffic. Full account of impact and mitigation should be included in the Plan and Action Programme to inform developers of likely requirements. **(2088 Scottish Government)**
- The proposal does not make clear what is going to happen to the Dark Entry as a path/woodland area. **(2099 Kate Corliss)**
- Objects on grounds of inadequate consultation, essential that Dark Entry is maintained, further clarity is required in terms of cycle and pedestrian access. **(2153 Callum Egan; 2308 Dolina Gorman)**

Representations seeking removal of HSG 34 Dalmeny

Seek removal of HSG 34 on the grounds of one or more of the reasons listed below:

- **Site Selection** - Queensferry should not be a preferred area as it is not located within the city boundary. Housing growth should link sustainably to business growths and jobs. Proposal does not comply with section 3 criterion in Plan. Impact on Queensferry. Agricultural land. Loss of clear boundaries between South Queensferry and Dalmeny.
- **Transport Infrastructure** - The Environmental Report Second Revision Volume 2 identifies the poor public transport access to Queensferry. Proposal will result in a

'commuter town'. Infrastructure currently inadequate in regards to walking routes, crossing points, condition of A904 which will worsen with opening of new bridge, congestion on Builyeon Road, Scotstoun Avenue, and Society Road and parking at Dalmeny Station. The Transport Appraisal overestimates bus use and underestimates train use. The opening of Gogar Station will increase capacity pressure on Dalmeny Railway Station and additional capacity on the Fife Circular is required and car parking capacity at Dalmeny Station as well as bus route coverage and provision of night buses. A strategic review is necessary to access impacts of 2500 new homes, world heritage status and Queensferry crossing.

- **School Infrastructure** - Concerned about the location of the new primary school due to air pollution. Unclear implications if extension to Queensferry High School extend will encompass new developments and whether it will be built on existing playing fields. Suggests a new high school in a central location should be considered. No mention of nursery provision.
- **Community facilities** - There is need to preserve the area and improve existing facilities: nursing home, sheltered housing and community hall, health care facilities and leisure centres.
- **Impact on the character of Queensferry** - The conservation area and setting of listed buildings.
- **A Strategy for Queensferry** - The development will impact on tourism industry. There is no economic plan or strategy provided for Queensferry and the Plan acknowledges limited opportunities for commercial uses. Provision of local employment for future residents should be a priority. The proposal will result in a 'commuter town'.
- **Developer Contributions** - The funding mechanism for new recreational facilities is not clear. No confidence that the Council will deliver or be in receipt of any developer contributions to the infrastructure.
- **Insufficient consultation** - The Plan process is undemocratic, no consultation has taken place and the process has been deliberately made cumbersome in that it discourages individuals and local interest groups from submitting representations, contrary to the guidance set out in Planning Advice Notice 81, the Plan is not Disability Discrimination Act compliant, in terms of its format.
- **Consultation with West Lothian** - Concerned that there hasn't been any consultation with West Lothian.
- **Sewage and Drainage** - Capacity issue at Queensferry Waste Water Treatment Plant
- **Retail in Dalmeny** - No shops proposed in Dalmeny.

(2126 Cockburn Association; 2707 Queensferry District Community Council and 27 individuals listed in Issue 11 Appendix C)

<u>Supports allocation of HSG 34</u>

- Supports allocation of HSG 34 Dalmeny. **(2480 Rosebery Estates Partnership)**

<u>Representations opposed to HSG 34 Dalmeny in current form and seeking its removal and/or change</u>

- Requests that any development should not include access through existing Wester Dalmeny Steading site due to increased traffic congestion, loss of car parking spaces, issue with road infrastructure and increased risk of accidents. **(0061**

Edward Crockford; 248 Martin Ewart)

- Objects on the grounds of road safety and parking facilities on Wester Dalmey Station and Bankhead Road. **(0271 Merril Wallen)**
- Concerned about location of proposed vehicular access, parking facilities, and traffic congestion. **(1800 Lorraine Milson)**
- Objects on the grounds of unsuitability of proposed access. **(0114 R.D.R MacSorley)**
- Objects on the grounds of above, suggests access taken from Bankhead Road is preferred option. **(0363 John Halliday)**
- Edinburgh Greenbelt Study 2 Stage 1 (LCA 13) indicates this area has no capacity for development; it has high landscape character and open space ratings; it is open space lying partly within and between conservation areas. Development would appear to contravene the following environmental policies: Env 6 Conservation Areas - Development; Env 18 Open Space. The LDP Environmental Report 2nd Revision does not appear to include an assessment for this site and hence, no justification is given for the loss for this locally important asset. **(2126 Cockburn Association)**
- Objects on grounds of limited community facilities to accommodate three housing developments combined. **(1594 Richard Carvel)**
- Objects on the grounds of parking provision. **(2214 Stuart MacNeil)**
- Suggests that new development should be in-keeping with existing buildings and existing views should not be restricted and consultation with local people should be carried out throughout the process. **(2153 Calum Egan)**
- space, impact on natural habitat, lack of amenity facilities to support new residents, access to schools and health services, existing local transport services, transport impact arising from commuters parking and tourism related with World Heritage status application. **(2433 John Rough)**
- Development must be built with the look and feel of the conservation area, including building materials. **(1689 Susan MacNeil)**

<u>Representations seeking removal of HSG 32 Builyeon Road & HSG 33 South Scotstoun</u>

Seek removal of HSG HSG 32 & 33 on the grounds of one or more of the reasons listed below:

- **Site Selection** - Queensferry should not be a preferred area as it is not located within the city boundary. Housing growth should link sustainably to business growths and jobs. Proposal does not comply with section 3 criterion in the Plan. Impact on Queensferry. Agricultural land. Loss of clear boundaries between South Queensferry and Dalmeny.
- **Transport Infrastructure** – The Environmental Report Second Revision Volume 2 identifies the poor public transport access to Queensferry. Proposal will result in a 'commuter town'. Infrastructure currently inadequate in regards to walking routes, crossing points, condition of A904 which will worsen with opening of new bridge, congestion on Builyeon Road, Scotstoun Avenue, and Society Road and parking at Dalmeny Station. The Transport Appraisal overestimates bus use and underestimates train use. The opening of Gogar Station will increase capacity pressure on Dalmeny Railway Station and additional capacity on the Fife Circular is required and car parking capacity at Dalmeny Station as well as bus route coverage and provision of night buses. A strategic review is necessary to access impacts of 2500 new homes, world heritage status and Queensferry crossing.

- **School Infrastructure** - Concerned about the location of the new primary school due to air pollution. Unclear implications if extension to Queensferry High School extend will encompass new developments and whether it will be built on existing playing fields. Suggests a new high school in a central location should be considered. No mention of nursery provision.
- **Community facilities** – there is need to preserve the area and improve existing facilities: nursing home, sheltered housing and community hall, Health care facilities and leisure centres.
- **Impact on the character of Queensferry** - the conservation area and setting of listed buildings.
- **A Strategy for Queensferry** - The development will impact on tourism industry. There is no economic plan or strategy provided for Queensferry and the Plan acknowledges limited opportunities for commercial uses. Provision of local employment for future residents should be a priority. The proposal will result in a 'commuter town'.
- **Developer Contributions** – The funding mechanism for new recreational facilities is not clear. No confidence that the Council will deliver or be in receipt of any developer contributions to the infrastructure.
- **Insufficient consultation** - the Plan process is undemocratic, no consultation has taken place and the process has been deliberately made cumbersome in that it discourages individuals and local interest groups from submitting representations, contrary to the guidance set out in Planning Advice Note 81, the Plan is not Disability Discrimination Act compliant, in terms of its format.
- **Consultation with West Lothian** - Concerned that there hasn't been any consultation with West Lothian.
- **Sewage and Drainage** - Capacity issue at Queensferry Waste Water Treatment Plant

(2705 Queensferry Ambition; 2707 Queensferry District Community Council and 21 individuals listed in Issue 11 Appendix D)

Supports allocation of HSG 32 and HSG 33

- Supports allocation of HSG 32 Builyeon Road and HSG 33 South Scotstoun. **(0828 Network Rail)**

Representations opposed to HSG 32 Builyeon Road & HSG 33 South Scotstoun in current form and seeking its removal and/or change

- Reduce number of housing proposed. **(1012 John Roy McIvor)**
- Suggests site East of Milburn Tower is preferable as it has adequate transport infrastructure and employment opportunities t o support new development. **(1589 Edward Kelly; 2707 Queensferry District Community Council)**

Representations seeking removal of HSG 32 Builyeon Road, HSG 33 South Scotstoun & HSG 34 Dalmeny

Seek removal of HSG 32, 33 & 34 on the grounds of one or more of the reasons listed below:

- **Site Selection** - Queensferry should not be a preferred area as it is not located

within the city boundary. Housing growth should link sustainably to business growths and jobs. Proposal does not comply with section 3 criterion in the Plan. Impact on Queensferry. Agricultural land. Loss of clear boundaries between South Queensferry and Dalmeny.

- **Transport Infrastructure** – The Environmental Report identifies the poor public transport access to Queensferry. Proposal will result in a 'commuter town'. Infrastructure currently inadequate in regards to walking routes, crossing points, condition of A904 which will worsen with opening of new bridge, congestion on Builyeon Road, Scotstoun Avenue, and Society Road and parking at Dalmeny Station. The Transport Appraisal overestimates bus use and underestimates train use. The opening of Gogar Station will increase capacity pressure on Dalmeny Railway Station and additional capacity on the Fife Circular is required and car parking capacity at Dalmeny Station as well as bus route coverage and provision of night buses. A strategic review is necessary to access impacts of 2500 new homes, world heritage status and Queensferry crossing.
- **School Infrastructure** - Concerned about the location of the new primary school due to air pollution. Unclear implications if extension to Queensferry High School extend will encompass new developments and whether it will be built on existing playing fields. Suggests a new high school in a central location should be considered. No mention of nursery provision.
- **Community facilities** – there is need to preserve the area and improve existing facilities: nursing home, sheltered housing and community hall, Health care facilities and leisure centres.
- **Impact on the character of Queensferry** - the conservation area and setting of listed buildings.
- **A Strategy for Queensferry** - The development will impact on tourism industry. There is no economic plan or strategy provided for Queensferry and the Plan acknowledges limited opportunities for commercial uses. Provision of local employment for future residents should be a priority. The proposal will result in a 'commuter town'.
- **Developer Contributions** – The funding mechanism for new recreational facilities is not clear. No confidence that CEC will deliver or be in receipt of any developer contributions to the infrastructure.
- **Insufficient consultation** - the Plan process is undemocratic, no consultation has taken place and the process has been deliberately made cumbersome in that it discourages individuals and local interest groups from submitting representations, contrary to the guidance set out in Planning Advice Note 81, the Plan is not Disability Discrimination Act compliant, in terms of its format.
- **Consultation with West Lothian** - Concerned that there hasn't been any consultation with West Lothian.
- **Sewage and Drainage -** Capacity issue at Queensferry Waste Water Treatment Plant
- **Retail in Dalmeny** - no shops proposed in Dalmeny.

(1020 Varney Residents Association; 1627 Linn Mill Resident Association; 1961 Kirkliston Community Council; 2705 Queensferry Ambition and 39 individuals listed in Issue 11 Appendix E)

<u>Supports allocation of HSG 32, 33 & 34</u>

- Supports allocation of HSG 32, 33 & 34. **(0355 Eric Douglas King)**

Representations opposed to HSG 32 Builyeon Road, HSG 33 South Scotstoun & HSG 34 Dalmeny in current form and seeking its removal and/or change

- Concerned that the loss of local employment has created a dormitory town and there is insufficient infrastructure to accommodate additional development, additional leisure, shopping, recreation, transport and employment infrastructure is needed. Suggests staging development along with the provision of infrastructure and further consultation with local people should be undertaken. **(0081 David Griffiths)**
- Objects on the grounds of traffic congestion, impact on transport infrastructure, lack of leisure and community facilities, impact on character of the town and lack of existing parking provision. **(2527 Alison Hobbs)**
- Objects on the grounds of impact on transport infrastructure, impact on traffic congestion, impact on local community facilities, impact of increased pollution, impact of a trapped environment, lack of business opportunities, impact on World Heritage Site application. Concerned about what housing types will be provided. Believes it is a poorly considered scheme. **(2612 Craig Mackenzie)**
- Concerned about whether communities will be facilitated with new development, need for improved leisure facilities, impact of pollution and a need for improved transport infrastructure. **(2592 John Mucklow)**
- Objects on the grounds of the above, but wishes to confirm If there are any plans to develop land in Echline. **(0646 Doug Tait)**
- Objects on the grounds of the above and suggests the Council should allocate housing near new tram line. **(2411 Steven Lane; 2451 Linda Lane; 2650 Victor Stevenson; 2652 Vera Stevenson)**
- Suggests the Garden District would be a more appropriate location for housing. **(2393 Juliette Summers)**
- Objects on the grounds of above. States that the Plan fails to allocate brownfield land at Port Edgar and that there are no finalised designs from developers. **(2432 William Tunnell)**
- Concerned about increase in demand for public transport, lack of existing parking provision impact on healthcare facilities. **(2491 James MacGregor)**
- Objects on the grounds that there is no provision for a new cemetery. **(2070 Diane Job)**

Modifications sought by those submitting representations:

Representations seeking removal of HSG 32 Builyeon Road

- Remove proposal from the Plan. **(2130 Colin Keir MSP; 2707 Queensferry District Community Council and 46 individuals listed in Issue 11 Appendix A)**

Representations opposed to HSG 32 Builyeon Road in current form and seeking its removal and/or change

- Remove the proposal from the Plan or reduce the size. **(0121 Richard Oakley; 0333 Andrea Robertson; 0474 Kim Venton; 0574 Joan Proven; 0668 Karen Balanowski; 1594 Richard Carvel; 2433 John Rough)**
- Reduce capacity of housing to 350-400, include shopping facility, health centre and provide recreational open space. **(0495 David and Violet Donnelly)**
- Remove proposed commercial development and relocate further west from the area

indicated. **(1033 Robert Robertson)**
- More committing language in the Plan. **(2048 Duncan Smith)**
- Include a bullet point under the Builyeon Road Development Principles on page 70 – 'potential cumulative impact on the A90 (including the forthcoming Queensferry and Scotstoun Junctions which are included within the Queensferry Crossing Works) in connection with the South Scotstoun site (HSG 33) requires to be appraised and the nature and scale of any necessary mitigation measures identified, and how they will be delivered. Engagement with Transport Scotland is recommended.' **(2088 Scottish Government)**
- Add the following new principles: new greenspace with trees within the site to meet the Council's Greenspace Standard. Maintain view to the Pentland Hills and, if feasible, to the new road bridge. **(2126 Cockburn Association)**
- Bullet points in regard to the opportunity for commercial use in North West part of site including potential relocation of petrol filling station should have requirement to retain existing woodlands. Pedestrian routes, road crossing points should be expanded to identify a planning requirement to undertake Builyeon Road site infrastructure works ahead of any development. Site access for potential housing to be via redundant north bound carriageway to east of site. **(2027 Robert Jeffrey)**
- Access provision within boundary woodland should be extended westwards to facilitate a link between site HSG 32 and HSG 1 to west of Springfield. Woodland boundary should have similar minimum requirements to those set out for HSG 33. **(2697 Scottish Natural Heritage)**

<u>Representations seeking removal of HSG 33 South Scotstoun</u>

- Remove proposal from the Plan. **(2130 Colin Keir MSP; 2707 Queensferry District Community Council and 55 individuals listed in Issue 11 Appendix B)**

<u>Representations opposed to HSG 33 South Scotstoun in current form and seeking its removal and/or change</u>

- Reduction number of housing proposed. **(0333 Andrea Robertson; 0474 Kim Venton; 0574 Joan Proven; 1594 Richard Carvel; 2214 Stuart MacNeill; 2433 John Rough; 2153 Callum Egan)**
- Community facilities should be in place before housing is sold. **(0478 Helen Nickson)**
- Remove Scotstoun Avenue as primary access for new development. **(0933 Nicholas Gracie Carmichael)**
- Remove vehicular access from Provost Milne Grove, reduce number of houses proposed, include green space and retain existing trees. **(1498 Edmund Saunders; 1499 Rebecca Saunders; 2019 Garry Croy; 2020 Marion Croy)**
- Include as a bullet point under the South Scotstoun Development Principles – 'Potential cumulative impact on A90 (including the forthcoming Queensferry and Scotstoun Junctions which are included within the Queensferry Crossing Works) in connection with the Builyeon Road site (HSG 32) requires to be appraised and the nature and scale of any necessary mitigation measures identified and how they will be delivered. Engagement with Transport Scotland is recommended.' **(2088 Scottish Government)**
- Retain Dark Entry path. **(2099 Kate Corliss)**
- Restrict properties to 1-1.5 storeys, increase green space and eco-considerations, and engage with community before construction. **(2153 Callum Egan)**

Representations seeking removal of HSG 34 Dalmeny

- Remove proposal from the Plan. **(2707 Queensferry District Community Council and 27 individuals listed in Issue 11 Appendix C)**

Representations opposed to HSG 34 Dalmeny in current form and seeking its removal and/or change

- Does not object to principle of development but objects to access through existing Wester Dalmeny Steading site. **(0061 Edward Crockford; 0248 Martin Ewart)**
- Change vehicular accesses from Wester Dalmeny Station and Bankhead Road. **(0271 Merrill Whalen)**
- Change proposed vehicular access. **(1800 Lorraine Millson)**
- Utilise existing access for proposed development. **(0114 R.D.R MacSorley)**
- Suggests access taken from Bankhead Road. **(0363 John Halliday)**
- Remove proposal from Plan on landscape capacity. **(2126 Cockburn Association)**
- Reduce number of housing in total (across three developments) in half. **(1594 Richard Carvel)**
- Objects on the grounds of parking provision. **(2214 Stuart MacNeil)**
- Reduce housing numbers, restrict height of new development, retain unrestricted views, restrict design of new houses, and ensure consultation with local people. **(2153 Callum Egan)**
- Remove proposal from Plan or reduce number of housing proposed. **(2433 John Rough)**
- Development must be built with the look and feel of the conservation area, including building materials. (**01689 Susan MacNeil)**

Representations seeking removal of HSG 32 & 33

- Remove proposal from the Plan. **(2705 Queensferry Ambition; 2707 Queensferry District Community Council and 21 individuals listed in Issue 11 Appendix D)**

Representations opposed to HSG 32 & 33 in current form and seeking its removal and/or change

- Reduce number of housing proposed. **(1012 John Roy McIvor, 2308 Dolina Gorman)**
- Suggests a site East of Milburn Tower is preferable as it has adequate transport infrastructure and employment opportunities t o support new development. **(1589 Edward Kelly; 2707 Queensferry District Community Council)**

Representations seeking removal of HSG 32, 33 & 34

- Remove proposal from the Plan. **(1020 Varney Residents Association; 1627 Linn Mill Resident Association; 1961 Kirkliston Community Council; 2705 Queensferry Ambition and 39 individuals listed in Issue 11 Appendix E)**

Representations opposed to HSG 32, 33 & 34 in current form and seeking its removal and/or change

- Restrict number of developments or stage development. **(0081 David Griffiths)**

- Reduce housing numbers, increase recreational and health facilities to be built by contractors. **(2527 Allison Hobbs)**
- Reduce housing numbers for construction and maintain green space. **(2612 Craig MacKenzie)**
- Increased provision of leisure facilities and transport infrastructure. **(2592 John Mucklow)**
- Objects on the grounds of the above, and for proposal to be removed from Plan. Wishes to confirm if there are any plans to develop land in Echline to the west of the Queensferry Crossing approach road. **(0646 Doug Tait)**
- Objects on the grounds of the above and suggests the Council should allocate housing near new tram line. **(2411 Steven Lane; 2451 Linda Lane; 2650 Victor Stevenson; 2652 Vera Stevenson)**
- Suggests the Garden District would be a more appropriate location for housing. **(2393 Juliette Summers)**
- The Plan fails to allocate browfield land at Port Edgar and states that there are no finalised designs from developers. **(2432 William Tunnell)**
- Additional car parking is required at Dalmeny station and further healthcare facilities should be provided. **(2491 James MacGregor)**
- Objects on the grounds that there is no provision for a new cemetery. **(2070 Diane Job)**

Summary of responses (including reasons) by planning authority:

Site Selection - HSG 32 Builyeon Road, HSG 33 South Scotstoun and HSG 34 Dalmeny

- The LDP must conform to the relevant provisions of the approved SDP and its Supplementary Guidance. These include a requirement for a generous allocation of housing land in the Council's area and the designation of a green belt around Edinburgh (SDP Policies 5, 7 and 12).

  In preparing the LDP, the Council has sought to meet the overall housing land requirement in ways which prioritise use of brownfield sites in existing urban areas and which minimise the loss of land from the Green Belt, in accordance with SDP paragraphs 113 and 130. The Council's response to the representations in Issue 5 explains why it is nevertheless necessary for this LDP to make significant new releases of greenfield land from the green belt at this time, and of the scale set out in the Second Proposed Plan.

  In selecting greenfield housing sites for release, the Council has sought to minimise the impact on greenbelt objectives and to secure long-term boundaries, in accordance with SDP Policy 12 and paragraph 130. To do so, the Council has assessed relevant greenfield land for its suitability in these terms. The site assessment process has gathered evidence on the relevant land on a systematic and consistent basis and presented its findings in a way which enables comparison and hence selection of those sites which are most appropriate. This approach has been informed by consideration of the findings and recommendations of the Report of Inquiry for the Edinburgh City Local Plan (pages 1-21 to 1-26).

  For the LDP the Council has set out the evidence of its housing site assessment in the project's Environmental Report, which also presents the statutory Strategic Environmental Assessment of the Plan. The method and criteria used in the site

selection process are described in Volume 1 of the Environmental Report – Second Revision, pages 26-33. The site assessments are set out in Appendices 5-9 (Volume 2) and, for some sites, the Environmental Report Addendum.
At each stage of the LDP project the Environmental Report has been revised and updated as appropriate to:

- show what regard has been had to statutory representations received at the previous stage;
- respond to changes in the SDP context to the LDP, which have required additional housing land to be found.

At the LDP's Main Issues Report and first Proposed Plan stages, the provisions of the emerging SDP were such that the emerging LDP could meet its requirement for new housing land within the West and South East Edinburgh Strategic Development Areas. The LDP was also restricted by the Proposed SDP's version of Policy 7 from making large (defined as over 50 units) new greenfield housing releases outwith the Strategic Development Areas. The context of the approved SDP and its Supplementary Guidance now means that the Second Proposed Plan has had to find additional sites, but has been able to do so partly on large sites outwith the Strategic Development Areas. Environmental and infrastructure constraints within these two Strategic Development Areas as identified in the site selection process have meant that some land there is not suitable for allocation and should be retained in the green belt. This outcome was anticipated in the SDP Supplementary Guidance (paragraph 3.9), and is consistent with SDP Policy 1A, which allows LDPs to identify areas of restraint where justified.

The criteria used for the housing site assessment are set out in Tables 6 and 7 of the Environmental Report (Volume 1). They are structured using the three objectives for green belts stated in SPP paragraph 49 and SDP Policy 12. They correspond to SDP policies and the content of Scottish Planning Policy as set out in Table 1, page 3 in the Environmental Report Addendum. The assessment findings set out in the appendices of the Environmental Report include the Council's overall conclusions about whether some or all of a site should be allocated in the LDP.

For ease of comparison, the assessment findings are presented in matrix form in Appendix 2 Updated of the Environmental Report Addendum (an updated version of Appendix 2 of the Environmental Report – Second Revision (Volume 1)). This is intended to be a similar format to that used in the Edinburgh City Local Plan Report of Inquiry. The LDP assessment uses a 'traffic light' symbology to indicate whether a site meets a criterion (green), does not meet it (red), or partly meets it / uncertainty (amber).

For sites selected and allocated in the LDP, a separate, statutory assessment of their likely environmental effects is set out in Appendix 3 of Volume 1 of the Environmental Report. In some cases this identifies likely adverse impacts. Section 4 of the Environmental Report sets these out along with proposed mitigation.

This site selection process has resulted in the Second Proposed Plan's spatial strategy, summarised on Figure 1 of the Plan. It meets the housing land requirements in full while designating a green belt which best meets the objectives of SPP and SDP Policy 12. The Second Proposed Plan's spatial strategy establishes and maintains strong, clear long-term boundaries to control the outward growth of the city.

The allocation of these sites HSG 32 Builyeon Road, HSG 33 South Scotstoun and HSG 34 Dalmeny in the Plan is therefore appropriate in terms of compliance with Scottish Planning Policy and SDP Policies 1 A & B, 5, 7, 8, 9 and 12.

No modification proposed.

Representations seeking removal of proposal HSG 32 Builyeon Road

- **Site Selection** - See Council's response on site selection and principle of development on Page 14.
- **Transport Infrastructure** - As part of the Local Development Plan process, the Council has carried out a Transport Appraisal. (Volumes 1 and 2, 2013, Addendum, 2014) This appraised the cumulative impact of the new developments proposed in the Plan, taking account of other factors. This identifies improvements to transport infrastructure to deal with the net impact of new housing proposals in Queensferry. These transport actions are set out in the Council's Proposed Action Programme on page 41. For Builyeon Road, the actions include new footways, cycle paths and pedestrian/cycle crossing facilities including a high quality pedestrian/cycle route to Dalmeny Station including a new route crossing the A90; upgrading of existing bus infrastructure facilities on Builyeon Road; additional bus capacity and increased frequency of direct city centre service and also to key local facilities; Improved cycle and car parking capacity at Dalmeny Station by adding a new level; and implementation of a Traffic Regulation Order and physical measures for reduced speed limit on Builyeon Road for road safety purposes. The details of these actions are being established through transport assessments required at the planning application stage. All relevant proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance. The impact of the proposed development on the rail network including capacity within the Fife Circular and the impact of the new Edinburgh Gateway Station is a matter for the Scottish Government and train operators.
- **School Infrastructure** - As part of the Plan process, the Council has prepared a Revised Education Appraisal June 2014 (corrected September 2014) which identifies the improvements to school infrastructure to deal with the net impact of new housing proposals in Queensferry. These Education actions are set out within the Council's Proposed Action Programme, pages 37-39. For Builyeon Road these actions include contributions towards a new Builyeon Road (non-denomination) Primary School with 60/60 nursery provision and additional capacity within both the non-denominational and denominational primary and high school estate. All proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance. The location of the new primary school will be dealt with at the masterplan and planning application stage. The Council is currently seeking funding for a replacement Queensferry High School to be located on the existing site. The design of the new High School will allow for expansion to accommodate new pupils from the LDP sites when developer contributions become available.
- **Community facilities** - The Plan in paragraph 72 acknowledges that housing proposals will have implications for the provision of primary healthcare and other community health services. Policy Hou 10 Community Facilities seeks to ensure that where practical and reasonable a range of community facilities is provided with new housing development. The Plan identifies where non-residential units should be provided in new housing sites which could provide potential premises for new health practices. Paragraph 130 of the Plan states that developer contributions to

measures intended to mitigate the net effects of development, other than actions identified in the Action Programme, may also be required. The Council has discussed all growth allocations with the relevant part of NHS Lothian. This has assessed the need for new and expanded general practitioner practices to accommodate the planned housing growth set out in the Second Proposed Plan. No specific actions have been included in the Action Programme at this time, however when suitable and specific actions are identified these will be included in future iterations of the Action Programme. Where these are needed to address demand arising from new development, financial contributions towards the cost may be sought in line with relevant policies and guidance.

- **Impact on the character of Queensferry** - The setting of Queensferry including any impact on the setting of listed buildings has been assessed in Volume 1 of the Environmental Report, page 134-137. The assessment concludes that the development will result in the loss of open farmland providing a rural context to the South of Queensferry and the northern edge of the Dundas Castle Inventory site. However this character will have already been altered considerably by the routing of the southern approach to the Queensferry Crossing.
- **A Strategy for Queensferry** - If the Reporter considers it appropriate, the Council sees merit in Supplementary Guidance for Queensferry being prepared so that the integration of the new development into Queensferry; including employment and community uses, can be considered.
- **Developer Contributions** - The Action Programme sets out actions to help mitigate the impact of strategic and planned growth and to deliver the proposals identified within the Plan. The approach takes into account the cumulative impact of a number of proposed developments. Approved guidance on Developer Contributions and Affordable Housing (February 2014) sets out how costs are to be shared proportionately in terms of scale and kind.
- **Insufficient consultation** - At the Main Issues Report stage, the emerging SDP context did not support new large-scale housing allocations outwith the Strategic Development Areas. Accordingly, the Council did not seek views on the principle of large housing allocations in Queensferry. Question 4 of the Main Issues Report did ask for views on the matter of small scale sites elsewhere, which provided some indication that change could occur outwith the Strategic Development Areas. In October 2013 the Council announced in its Development Plan Scheme that it would have to modify the Plan to accord with the approved SDP and its Supplementary Guidance. Between then and June 2014, the Council sought to raise awareness with community groups that there was a need for more housing sites, and that large sites could now be allocated outwith the two Strategic Development Areas. The Council also made available a map showing all such sites under consideration. Between June 2014 and the start of the representation period, the approved Second Proposed Plan was in the public domain, and advance notice was being given of engagement events and opportunity to submit representations. The Report of Conformity covers the engagement which took place from August to October 2014. The Council's Interpretation and Translation Service provides interpretation and translation in many community languages, Braille, tape, large print and British Sign Language and this identified in the back cover of the Plan.
- **Consultation with West Lothian** - The neighbouring authorities including West Lothian are statutory consultees to the Plan. West Lothian Council have not provided any comments in response to proposals in Queensferry.
- **Sewage and drainage** - The Environmental Report Second Revision Volume 2 on page 134 identifies that Queensferry Waste Water Treatment Works has limited capacity. At such a point where capacity is no longer available, under Ministerial

Direction, when a developer satisfies Scottish Water's growth criteria then a growth project will be initiated. It should be noted that Scottish Water's criteria is that the site is included in the Local Development Plan. Scottish Water has advised the Council that limited capacity should not be seen as a barrier to development and Scottish Water will fund the upgrade at the Waste Water Treatment Works.

No modifications proposed.

(2130 Colin Keir MSP; 2707 Queensferry District Community Council and 48 individuals listed in Issue 11 Appendix A)

Representations opposed to HSG 32 Builyeon Road in current form and seeking its removal and/or change

- It is appropriate for planning authorities to identify the capacities of housing sites in their Plan's. To do so, it is necessary for them to make assumptions about density. The density assumption at Builyeon Road comes from multiplying the developable area identified on page 153 of the Environmental Report – Second Revision Volume 2 (28 ha), by the density range on page 28 of Volume 1 (27.5 to 32.5 dwellings per hectare). It should be noted that capacity range for Builyeon Road and for the other new housing allocations is low in the Edinburgh context. No modification proposed. **(0121 Richard Oakley; 0333 Andrea Robertson; 0474 Kim Venton; 0574 Joan Proven; 0668 Karen Balanowski; 1594 Richard Carvel**; **2433 John Rough; 0495 David and Violet Donnelly)**
- The Builyeon Road Development Principles (Page 70) identify an opportunity for commercial facilities in the North West part of the site, including the potential of the relocation of the petrol station. This is to serve traffic from the new Queensferry Crossing, linking with potential changes to the commercial facilities currently serving the A90. Any impact of this proposal on residential amenity will be dealt with at the Masterplanning and planning application stage. No modification proposed. **(1033 Robert Robertson)**
- The opportunity to provide a bridge linking to Ferrymuir over the A90, as identified in the site brief, is dependent on the future use and development of this section of the A90 once the new Queensferry Crossing has opened. Further discussions regarding this opportunity will be had at the masterplan stage with Transport Scotland who maintains the trunk road network. If a bridge is identified as being required at this stage it will be added to the Action Programme and a contribution zone established. No modification proposed. **(2048 Duncan Smith)**
- The Transport Appraisal identifies a potential 10.6% increase in peak car trips on the A90 as a result of the new housing sites at Queensferry. In addition, the Transport Assessment states that 'prospective developers should be aware Transport Scotland may require an assessment of impact on the new Forth Replacement Crossing junction'. The Council will discuss whether there are additional transport requirements for the sites in Queensferry in relation to the A90 with Transport Scotland at the masterplan and planning application stage. Any additional actions will be identified within an update to the accompanying Action Programme. No modification proposed. **(2088 Scottish Government)**
- Add the following new principles a) and b) The proposed density range of 25-35 units per hectare will provide sufficient flexibility to meet the Council's Local Greenspace and Play Standard on site, potentially in proximity to the new Primary School to be located towards the centre of the site. The existing Large Greenspace at Echline Grove/Stoneyflatts Crescent to the north of Builyeon Road currently

meets open space quality standards. Through the introduction of the proposed footway/cycle connections across Builyeon Road and green corridor through the site, it would be within 800 m walking distance of the majority of new dwellings. The Open Space Strategy would also provide the mechanism for any off-site improvement actions to open space quality or access routes. In addition a new landscape framework will be required to supplement existing woodland planting to the south of the site. c) The Council seeks merit in part of this application and would support the incorporation of views towards these features as part of any masterplan to provide reference to features of the wider landscape. However, as no specific viewpoint has been identified it is considered that this could be achieved in accordance with Policy Des 3 – Incorporating and Enhancing Existing and Potential Features. No modification proposed. **(2126 Cockburn Association)**

- The development principles for Builyeon Road do not cover the layout if the commercial use in North West part of site is to relocate. This would be discussed if an application were to come forward for development. It is not appropriate to ask a developer to undertake Builyeon Road site infrastructure works ahead of any development. Site access can only be taken via land owned by the developer. **(2027 Robert Jeffrey)**
- The Council notes this recommendation and considers that a path route within HSG1 would form a logical connection to the northwest for any green network established within the site and eastward link to Dalmeny Station for new development to the west of Queensferry. Site Briefs have not been prepared for the existing housing proposals set out in Table 3, nonetheless appropriate path connections would be required in accordance with Policy Des 7 – Layout Design, Policy Des 9 – Urban Edge Development and Policy Env 20 – Open Space in New Development. Any route would also be required to take into account safe crossing distances to the east of the new Queensferry junction. The proposed landscape framework within the site takes into account the vertical road alignment of the southern approach to the Queensferry Crossing and existing constraint of the oil pipeline to the southeast of the site. It is purposefully wider to the east, where the approach road sits on an embankment above the site and where the existing pipeline would limit further tree planting. It is narrower to the west, where the approach road will sit below the site within a cutting and planted embankment. The minimum width of planting required at South Scotstoun relates to the site-specific continuation of the existing tree lined track. No modification proposed. **(2697 Scottish Natural Heritage)**

<u>Update from Capital Coalition Motion 14 May 2015:</u>
Subject to the following points regarding the outcome of an appeal at Cammo, the Council sees merit in the representations seeking a reduction in the capacity of proposals HSG 19 Maybury (see Issue 7) and HSG 32 Builyeon Road and HSG 33 South Scotstoun. The Council notes that these sites currently have a total capacity of 3130 units and that a proportionate reduction in their housing capacity resulting in fewer units could be accounted for by the remaining capacity provided by the allocation of East of Millburn Tower (see Issue 14).

Appeal PPA-230-2134 relates to the site of HSG 20 Cammo. It was pending decision as of 28 May 2015. If, before the conclusion of this LDP examination, the Cammo appeal is allowed and planning permission granted, the Council directs attention to the representations raised in relation to HSG 19 Maybury and states that they are of particular merit.

If the Cammo appeal is dismissed and permission refused, the Council states that it sees merit in the representations which object to HSG 20 Cammo, and that the reduction in numbers could be accounted for by the remaining capacity provided by the allocation of East of Millburn Tower (see Issue 14). The Council notes that the removal of sites HSG 31 Curriemuirend, HSG 36 Curriehill Road and HSG 37 Newmills Road could also be accommodated within that capacity, but that there would thus be reduced scope to accommodate a reduction in the sites HSG 19 Maybury, HSG 32 Builyeon Road and HSG 33 South Scotstoun. Should this scenario arise, the Council directs attention to the representations raised in relation to HSG 32 Builyeon Road and HSG 33 South Scotstoun, and states that they are of particular merit.

Representations seeking removal of proposal HSG 33 South Scotstoun

- **Site Selection** - See Council's response on site selection and principle of development on Page 14.
- **Transport Infrastructure** - As part of the Local Development Plan process, the Council has carried out a Transport Appraisal. (Volumes 1 and 2, 2013, Addendum, 2014) This appraised the cumulative impact of the new developments proposed in the Plan, taking account of other factors. This identifies improvements to transport infrastructure to deal with the net impact of new housing proposals in Queensferry. These transport actions are set out in the Council's Proposed Action Programme on page 41. For South Scotstoun, the actions include a high quality east/west cycle route through site to allow realignment of existing National Cycle Route running nearby; additional cycle parking and car parking capacity at Dalmeny Station by adding new level; upgrade existing bus stop facilities on Kirkliston Road, Scotstoun Avenue and in Dalmeny; additional capacity and increased frequency of direct city centre bus service and also to key local facilities. The detail of these actions is being established through transport assessments required at the planning application stage. All relevant proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance. The impact of the proposed development on the rail network including capacity within the Fife Circular and the impact of the new Edinburgh Gateway Station is a matter for the Scottish Government and train operators.
- **School Infrastructure** - As part of the Plan process, the Council has prepared a Revised Education Appraisal June 2014 (corrected September 2014) which identifies the improvements to school infrastructure to deal with the net impact of new housing proposals in Queensferry. These Education actions are set out within the Council's Proposed Action Programme, pages 37-39. For South Scotstoun these actions include contributions towards a new Builyeon Road (non-denomination) Primary School with 60/60 nursery provision and additional capacity within both the non-denominational and denominational primary and high school estate. All proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance. The location of the new primary school will be dealt with at the masterplan and planning application stage. The Council is currently seeking funding for a replacement Queensferry High School to be located on the existing site. The design of the new High School will allow for expansion to accommodate new pupils from the LDP sites when developer contributions become available.
- **Community facilities** - The Plan in paragraph 72 acknowledges that housing proposals will have implications for the provision of primary healthcare and other community health services. Policy Hou 10 Community Facilities seeks to ensure that

where practical and reasonable a range of community facilities is provided with new housing development. The Plan identifies where non-residential units should be provided in new housing sites which could provide potential premises for new health practices. Paragraph 130 of the Plan states that developer contributions to measures intended to mitigate the net effects of development, other than actions identified in the Action Programme, may also be required. The Council has discussed all growth allocations with the relevant part of NHS Lothian. This has assessed the need for new and expanded general practitioner practices to accommodate the planned housing growth set out in the Second Proposed Plan. No specific actions have been included in the Action Programme at this time, however when suitable and specific actions are identified these will be included in future iterations of the Action Programme. Where these are needed to address demand arising from new development, financial contributions towards the cost may be sought in line with relevant policies and guidance.

- **Impact on the character of Queensferry** - The setting of Queensferry including any impact on the setting of listed buildings has been assessed in Vol 1 of the Environmental Report, page 138-140. The assessment concludes that development would not impact adversely on the character of the settlement and local landscape. Development reflects the pattern of 20th century settlement growth. Changes to the character of the local landscape would be contained by the physical severance of the A90.
- **A Strategy for Queensferry** - if the Reporter considers it appropriate, the Council sees merit in Supplementary Guidance for Queensferry being prepared so that the integration of the new development into Queensferry; including employment and community uses, can be considered.
- **Developer Contributions** - The Action Programme sets out actions to help mitigate the impact of strategic and planned growth and to deliver the proposals identified within the Plan. The approach takes into account the cumulative impact of a number of proposed developments. Approved guidance on Developer Contributions and Affordable Housing (February 2014) sets out how costs are to be shared proportionately in terms of scale and kind.
- **Insufficient consultation** - At the Main Issues Report stage, the emerging SDP context did not support new large-scale housing allocations outwith the Strategic Development Areas. Accordingly, the Council did not seek views on the principle of large housing allocations in Queensferry. Question 4 of the Main Issues Report did ask for views on the matter of small scale sites elsewhere, which provided some indication that change could occur outwith the Strategic Development Areas. In October 2013 the Council announced in its Development Plan Scheme that it would have to modify the Plan to accord with the approved SDP and its Supplementary Guidance. Between then and June 2014, the Council sought to raise awareness with community groups that there was a need for more housing sites, and that large sites could now be allocated outwith the two Strategic Development Areas. The Council also made available a map showing all such sites under consideration. Between June 2014 and the start of the representation period, the approved Second Proposed Plan was in the public domain, and advance notice was being given of engagement events and opportunity to submit representations. The Report of Conformity covers the engagement which took place from August to October 2014. The Council's Interpretation and Translation Service provides interpretation and translation in many community languages, Braille, tape, large print and British Sign Language and this identified in the back cover of the Plan.
- **Consultation with West Lothian** - The neighbouring authorities including West Lothian are statutory consultees to the Plan. West Lothian Council have not

provided any comments in response to proposals in Queensferry.

- **Sewage and drainage** - The Environmental Report Second Revision Volume 2 on page 138 identifies that Queensferry Waste Water Treatment Works has limited capacity. At such a point where capacity is no longer available, under Ministerial Direction, when a developer satisfies Scottish Water's growth criteria then a growth project will be initiated. It should be noted that Scottish Water's criteria is that the site is included in the Local Development Plan. Scottish Water has advised the Council that limited capacity should not be seen as a barrier to development and Scottish Water will fund the upgrade at the Waste Water Treatment Works.

(2130 Colin Keir MSP; 2707 Queensferry District Community Council and 54 individuals listed in Issue 11 Appendix B)

Representations opposed to HSG 33 South Scotstoun in current form and seeking its removal and/or change

- It is appropriate for planning authorities to identify the capacities of housing sites in their Local Development Plans. To do so, it is necessary for them to make assumptions about density. The density assumption at South Scotstoun comes from multiplying the developable area identified on page 154 of the Environmental Report Second Revision Volume 2 (14.5 ha), by the density range on page 28 of Volume 1 (27.5 to 32.5 dwellings per hectare). It should be noted that capacity range for Builyeon Road and for the other new housing allocations is low in the Edinburgh context. No modification proposed. **(0333 Andrea Robertson; 0474 Kim Venton; 0574 Joan Proven; 1594 Richard Carvel; 2214 Stuart MacNeill; 2433 John Rough; 2153 Callum Egan; 2308 Dolina Gorman)**
- No policy requirement to provide tree planting to the boundary of private residential gardens. However, it is highlighted in the Site Development Principles for South Scotstoun (HSG 33) that existing field trees in this location are to be retained. The layout must also provide a local greenspace in accordance with the Council's Open Space Strategy standards. These matters would be considered in detail as part of the urban design and landscape framework of any masterplan submitted for the site and assessed against design and environmental policies, informed as necessary by the Edinburgh Design Guidance. No modification proposed. **(0478 Helen Nickson)**
- The Transport Appraisal (Volumes 1 and 2, 2013, Addendum, 2014) identifies the primary access for South Scotstoun to be from Kirkliston Road to west of site, with secondary access from South Scotstoun and potentially from Dalmeny**.** No modification proposed. **(0933 Nicholas Gracie Carmichael; 1498 Edmund Saunders; 1499 Rebecca Saunders; 2019 Garry Croy; 2020 Marion Croy)**
- No policy requirement to provide tree planting to the boundary of private residential gardens. However, it is highlighted in the Site Development Principles for South Scotstoun (HSG 33) that existing field trees in this location are to be retained. The layout must also provide a local greenspace in accordance with the Council's Open Space Strategy standards. These matters would be considered in detail as part of the urban design and landscape framework of any masterplan submitted for the site and assessed against design and environmental policies, informed as necessary by the Edinburgh Design Guidance. No modification proposed. **(0933 Nicholas Gracie Carmichael; 1498 Edmund Saunders; 1499 Rebecca Saunders; 2019 Garry Croy; 2020 Marion Croy)**
- The Transport Appraisal identifies a potential 10.6% increase in peak car trips on the A90 as a result of the new housing sites at Queensferry. In addition, the TA states that 'prospective developers should be aware Transport Scotland may require an assessment of impact on the new Forth Replacement Crossing junction'. The

Council will discuss whether there are additional transport requirements for the sites in Queensferry in relation to the A90 with Transport Scotland at the masterplan and planning application stage. Any additional actions will be identified within an update to the accompanying Action Programme. No modification proposed. **(2088 Scottish Government)**

- The Action Programme identifies a requirement for a 'high quality east/west cycle route through site to allow realignment of existing National Cycle Route running nearby'. Connections to the existing family friendly cycle network in Queensferry will be discussed at the masterplanning and planning application stage. No modification proposed. **(2099 Kate Corliss; 2153 Callum Egan; 2308 Dolina Gorman)**

Update from Capital Coalition Motion 14 May 2015:
Subject to the following points regarding the outcome of an appeal at Cammo, the Council sees merit in the representations seeking a reduction in the capacity of proposals HSG 19 Maybury (see Issue 7) and HSG 32 Builyeon Road and HSG 33 South Scotstoun. The Council notes that these sites currently have a total capacity of 3130 units and that a proportionate reduction in their housing capacity resulting in fewer units could be accounted for by the remaining capacity provided by the allocation of East of Millburn Tower (see Issue 14).
Appeal PPA-230-2134 relates to the site of HSG 20 Cammo. It was pending decision as of 28 May 2015. If, before the conclusion of this LDP examination, the Cammo appeal is allowed and planning permission granted, the Council directs attention to the representations raised in relation to HSG 19 Maybury and states that they are of particular merit.
If the Cammo appeal is dismissed and permission refused, the Council states that it sees merit in the representations which object to HSG 20 Cammo, and that the reduction in numbers could be accounted for by the remaining capacity provided by the allocation of East of Millburn Tower (see Issue 14). The Council notes that the removal of sites HSG 31 Curriemuirend, HSG 36 Curriehill Road and HSG 37 Newmills Road could also be accommodated within that capacity, but that there would thus be reduced scope to accommodate a reduction in the sites HSG 19 Maybury, HSG 32 Builyeon Road and HSG 33 South Scotstoun. Should this scenario arise, the Council directs attention to the representations raised in relation to HSG 32 Builyeon Road and HSG 33 South Scotstoun, and states that they are of particular merit.

Representations seeking removal of proposal HSG 34 Dalmeny

- **Site Selection** - See Council's response on site selection and principle of development on Page 14.
- **Transport Infrastructure** - As part of the Local Development Plan process, the Council has carried out a Transport Appraisal. (Volumes 1 and 2, 2013, Addendum, 2014) This appraised the cumulative impact of the new developments proposed in the Plan, taking account of other factors. This identifies improvements to transport infrastructure to deal with the net impact of new housing proposals in Queensferry. These transport actions are set out in the Council's Proposed Action Programme on page 41. For Dalmeny, the action is to upgrade existing bus stops in Bankhead Road/Main Street. The detail of this action is being established through transport assessments required at the planning application stage. All relevant proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance. The impact of the proposed development on the rail network including capacity within the Fife Circular and the impact of the

new Edinburgh Gateway Station is a matter for the Scottish Government and train operators.

- **School Infrastructure** - As part of the Plan process, the Council has prepared a Revised Education Appraisal June 2014 (corrected September 2014) which identifies the improvements to school infrastructure to deal with the net impact of new housing proposals in Queensferry. These Education actions are set out within the Council's Proposed Action Programme, pages 37-39. For Dalmeny these actions include contributions towards a new Builyeon Road (non-denomination) Primary School with 60/60 nursery provision and additional capacity within both the non-denominational and denominational primary and high school estate. All proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance. The location of the new primary school will be dealt with at the masterplan and planning application stage. The Council is currently seeking funding for a replacement Queensferry High School to be located on the existing site. The design of the new High School will allow for expansion to accommodate new pupils from the LDP sites when developer contributions become available.
- **Community facilities** - The Plan in paragraph 72 acknowledges that housing proposals will have implications for the provision of primary healthcare and other community health services. Policy Hou 10 Community Facilities seeks to ensure that where practical and reasonable a range of community facilities is provided with new housing development. The Plan identifies where non-residential units should be provided in new housing sites which could provide potential premises for new health practices. Paragraph 130 of the Plan states that developer contributions to measures intended to mitigate the net effects of development, other than actions identified in the Action Programme, may also be required. The Council has discussed all growth allocations with the relevant part of NHS Lothian. This has assessed the need for new and expanded general practitioner practices to accommodate the planned housing growth set out in the Second Proposed Plan. No specific actions have been included in the Action Programme at this time, however when suitable and specific actions are identified these will be included in future iterations of the Action Programme. Where these are needed to address demand arising from new development, financial contributions towards the cost may be sought in line with relevant policies and guidance.
- **Impact on the character of Queensferry** - The setting of Queensferry including any impact on the setting of listed buildings has been assessed in Volume 1 of the Environmental Report, page 141 -143. The assessment concludes that the development of the site can be integrated with the character of the settlement subject to the design of built form appropriate to the small scale and rural character of the conservation area.
- **A Strategy for Queensferry** - If the Reporter considers it appropriate, the Council sees merit in Supplementary Guidance for Queensferry being prepared so that the integration of the new development into Queensferry; including employment and community uses, can be considered.
- **Developer Contributions** - The Action Programme sets out actions to help mitigate the impact of strategic and planned growth and to deliver the proposals identified within the Plan. The approach takes into account the cumulative impact of a number of proposed developments. Approved guidance on Developer Contributions and Affordable Housing (February 2014) sets out how costs are to be shared proportionately in terms of scale and kind.
- **Insufficient consultation** - At the Main Issues Report stage, the emerging SDP context did not support new large-scale housing allocations outwith the Strategic

Development Areas. Accordingly, the Council did not seek views on the principle of large housing allocations in Queensferry. Question 4 of the Main Issues Report did ask for views on the matter of small scale sites elsewhere, which provided some indication that change could occur outwith the Strategic Development Areas. In October 2013 the Council announced in its Development Plan Scheme that it would have to modify the LDP to accord with the approved SDP and its Supplementary Guidance. Between then and June 2014, the Council sought to raise awareness with community groups that there was a need for more housing sites, and that large sites could now be allocated outwith the two Strategic Development Areas. The Council also made available a map showing all such sites under consideration. Between June 2014 and the start of the representation period, the approved Second Proposed Plan was in the public domain, and advance notice was being given of engagement events and opportunity to submit representations. The Report of Conformity covers the engagement which took place from August to October 2014. The Council's Interpretation and Translation Service provides interpretation and translation in many community languages, Braille, tape, large print and British Sign Language and this identified in the back cover of the Plan.

- **Consultation with West Lothian** - The neighbouring authorities including West Lothian are statutory consultees to the Plan. West Lothian Council have not provided any comments in response to proposals in Queensferry.
- **Sewage and drainage** - The Environmental Report Second Revision Volume 2 on page 141 identifies that Queensferry Waste Water Treatment Works sufficient capacity to accommodate HSG 34 Dalmeny. At such a point where capacity is no longer available, under Ministerial Direction, when a developer satisfies Scottish Water's growth criteria then a growth project will be initiated. It should be noted that Scottish Water's criteria is that the site is included in the Local Development Plan. Scottish Water has advised the Council that limited capacity should not be seen as a barrier to development and Scottish Water will fund the upgrade at the Waste Water Treatment Works.
- **Retail in Dalmeny** - Housing proposals do not preclude the inclusion of non-residential units. Retail proposals will be assessed against relevant policies within the Plan.

No modifications proposed.

(2707 Queensferry District Community Council and 27 individuals listed in Issue 11 Appendix C)

<u>Supports allocation of HSG 34 Dalmeny</u>

- **2480 Roseberry Estates Partnership**

<u>Representations opposed to HSG 34 Dalmeny in current form and seeking its removal and/or change</u>

- No modification proposed to the Plan in terms of access to HSG 34 Dalmeny; however it is acknowledged that if the reporter sees merit that amending the Dalmeny Development Principles to read 'vehicular access to be taken solely from Bankhead Road' would help address representations. No modification proposed**. (0061 Edward Crockford; 0248 Martin Ewart; 0271 Merrill Whalen; 1800 Lorraine Millson; 0114 R.D.R MacSorley; 0363 John Halliday)**
- This land, subject to a representation from Roseberry Estates, was assessed in the

Environmental Report - Second Revision, Volume 2, June 2014, as 'Bankhead Road' pages 141-143. This considered the impact of small scale development on the Conservation Area and the role of the greenbelt to protect and enhance the character, landscape setting and identity of the settlement. The land is not identified in the Council's Open Space Audit and its development would not impact on green belt objectives to protect and provide access to open space. No modification proposed. **(2126 Cockburn Association)**

- It is appropriate for planning authorities to identify the capacities of housing sites in their Local Development Plans. To do so, it is necessary for them to make assumptions about density. The density assumption at South Scotstoun comes from multiplying the developable area identified on page 154 of the Environmental Report Second Revision Volume 2 (14.5 ha), by the density range on page 28 of Volume 1 (27.5 to 32.5 dwellings per hectare). It should be noted that capacity range for Builyeon Road and for the other new housing allocations is low in the Edinburgh context. No modification proposed. **(1594 Richard Carvel; 2153 Callum Egan; 2214 Stuart MacNeill; 2308 Dolina Gorman; 2433 John Rough)**
- Design policies within the Plan will be used to consider the impact of the development on the conservation area at Planning Application stage **(01689 Susan MacNeil)**

Representations seeking removal of proposals HSG 32 & 33

- The Council's response and reasoning regarding issues relating transport infrastructure, school infrastructure, community facilities, impact on the character of Queensferry, a Strategy for Queensferry, developer contributions, insufficient consultation, consultation with West Lothian, sewage and drainage; and, retail in Dalmeny is set out for each site individually above. No modification proposed.

(2705 Queensferry Ambition; 2707 Queensferry District Community Council and 21 individuals listed in Issue 11 Appendix D)

Representations opposed to HSG 32 & 33 in current form and seeking its removal and/or change

- It is appropriate for planning authorities to identify the capacities of housing sites in their Local Development Plans. To do so, it is necessary for them to make assumptions about density. The density assumption at South Scotstoun comes from multiplying the developable area identified on page 154 of the Environmental Report – Second Revision Volume 2 (14.5 ha), by the density range on page 28 of Volume 1 (27.5 to 32.5 dwellings per hectare). It should be noted that capacity range for Builyeon Road and for the other new housing allocations is low in the Edinburgh context. No modification proposed. **(1012 John Roy McIvor)**
- Some representations have identified other sites as an alternative to HSG 32 and 33. Other sites have been identified in the Second Proposed Plan as explained in the Revised Environmental Report June 2014. Other suggested sites within Edinburgh are not considered appropriate for the reasons set out in the Revised Environmental Report June 2014. This includes East of Milburn Tower site. **(1589 Edward Kelly; 2707 Queensferry District Community Council)**

Representations seeking removal of HSG 32, 33 & 34

- The Council's response and reasoning regarding issues relating transport

infrastructure, school infrastructure, community facilities, impact on the character of Queensferry, a Strategy for Queensferry, developer contributions, insufficient consultation, consultation with West Lothian, sewage and drainage; and, retail in Dalmeny is set out for each site individually above. No modification proposed.

No modification proposed.

(1020 Varney Residents Association; 1627 Linn Mill Resident Association; 1961 Kirkliston Community Council; 2705 Queensferry Ambition and 39 individuals listed in Issue 11 Appendix E)

Representations opposed to HSG 32, 33 & 34 in current form and seeking its removal and/or change

- It is appropriate for planning authorities to identify the capacities of housing sites in their Local Development Plans. To do so, it is necessary for them to make assumptions about density. The density assumption at South Scotstoun comes from multiplying the developable area identified on page 154 of the Environmental Report – Second Revision Volume 2 (14.5 ha), by the density range on page 28 of Volume 1 (27.5 to 32.5 dwellings per hectare). It should be noted that capacity range for Builyeon Road and for the other new housing allocations is low in the Edinburgh context. Community and leisure facilities are dealt with above. No modification proposed. **(0081 David Griffiths; 2527 Allison Hobbs; 2612 Craig MacKenzie; 2592 John Mucklow)**
- Land to the West of the new Queensferry Crossing is identified as Countrywide Policy area and not allocated for Housing. Land to the east is allocated as HSG1 Springfield. No modification proposed. **(0646 Doug Tait)**
- Some representations have identified other sites as an alternative to HSG32, 33, & 34. Other sites have been identified in the Second Proposed Plan as explained in the Revised Environmental Report June 2014. However because of the increased housing requirement for Edinburgh, these are in addition to HSG32, 33, & 34, not alternatives. This includes land along the tram line at Edinburgh Park. No modification proposed. **(2411 Steven Lane; 2451 Linda Lane; 2650 Victor Stevenson; 2652 Vera Stevenson)**
- Other suggested sites within Edinburgh are not considered appropriate for the reasons set out in the Revised Environmental Report June 2014. This includes East of Milburn Tower site. No modification proposed**. (2393 Juliette Summers)**
- Previous housing allocations in Port Edgar in the Rural West Edinburgh Local Plan were removed from the Plan due to the lack of proposals coming forward. Housing development at Port Edgar would however be supported if a proposal was to come forward. No modification proposed. **(2432 WilliamTunnell)**
- Additional car parking at Dalmeny Station is required by the LDP Action Programme and the requirement for healthcare facilities is addressed above. No modification proposed. **(2491 James MacGregor)**
- SPP paragraph 222 states that Development Plans should be informed by Open Space Strategies sand reflect their priorities. The Council's Open Space Strategy (September 2010) sets out requirements for cemeteries on Page 26. The new Craigmillar Castle Park Cemetery is expected to provide for the city's need for the next 50 years. The Strategy identifies a need for future burial grounds for Queensferry and Kirkliston where present capacity is expected to run out by 2020. No modification proposed. **(2070 Diane Job)**

Reporter's conclusions:

Context

1. Paragraph 119 of Scottish Planning Policy states that local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Allocated housing sites should be effective in meeting the housing supply target. Policy 5 of SESplan sets out the housing land requirement for the SESplan area, and Supplementary Guidance provides the required share of this housing within the City of Edinburgh. I refer to the findings in Issue 5 relating to the sufficiency of the housing land supply in this context, which also cover matters raised in the representations relating to the type of housing provided.

2. The spatial strategy of both SESplan and the local development plan prioritises the development of housing within 4 strategic development areas, and these sites do not lie within a strategic development area. However, Policy 7 of SESplan refers to the allocation of greenfield sites for housing development either within or outwith the identified strategic development areas. These sites were all added to the housing land supply through the second proposed local development plan which is the subject of this examination, in order to contribute to meeting the shortfall which is identified within the findings under Issue 5.

3. Whilst it has not been possible to avoid some release of green belt land in meeting the housing land requirement, the council has sought to minimise the impact on green belt objectives. The assessment of the allocated sites is set out in the environmental report, which is the context for my examination of the representations relating to these sites.

4. In the circumstances, the inclusion of existing green belt land within the housing allocations is necessary in order to meet the housing land requirement over the plan period in full. However, this would not prevent the deletion or modification of particular sites where it is found through this examination that such sites would not be appropriate with respect to their environmental impact or the available infrastructure. Alternative means would then need to be found in order to make up any resulting shortfall.

HSG 32 Builyeon Road and HSG 33 South Scotstoun

<u>General approach</u>

5. The representations with respect to these 2 sites are closely related, and indeed many of the conclusions (in principle) to be drawn relate to both sites. I find that the cumulative impact of both sites is particularly important, and I therefore set out my initial findings for both sites together. However, and following on from this, I set out findings separately for each site. This particularly applies to the site brief and site specific development principles, which although related are distinct for each site. In addition, there is some cumulative impact with HSG 34, although the number of houses proposed there is significantly smaller, so whilst many of the cumulative issues also apply, the cumulative effect is less significant, and the main issues for HSG 34 relate to the physical characteristics of the site, which are considered separately below.

6. Sites HSG 32 and HSG 33 constitute significant releases of green belt land. The site at Builyeon Road is some 41.5 hectares and the potential capacity for housing development

extends to 980 houses. The site at South Scotstoun is smaller, but is still 20 hectares in extent and has a potential capacity up to 510 houses. The total combined capacity for both sites extends to 1,490 houses. The development of these sites would have significant environmental effects and infrastructure requirements, and this is reflected in the number of representations submitted with respect to their allocation.

7. The majority of the representations seek the removal of the sites from the plan, although in the event that the sites are allocated for housing development, some seek a reduction of the size of the sites and scale of development, improvement of the transport infrastructure and the inclusion of additional open space, woodland or community (including health) and leisure facilities, whilst others seek further provisions being made within the development principles on various matters. I examine both of these proposed housing sites under the key subject matters raised within the representations, taking into account both the principle and scale of development, and matters set out in the development principles and the site brief.

The spatial strategy

8. The spatial strategy within SESplan focuses on 13 strategic development areas, of which 4 are in Edinburgh. The housing land requirement for Edinburgh as set out in the approved Supplementary Guidance should therefore be provided within these areas as far as possible. However, it is recognised in Policy 7 of SESplan that sites for greenfield housing development either within or outwith strategic development areas may be allocated in local development plans in order to maintain a 5 year effective housing land supply, subject to this being in keeping with the character of the settlement and local area, not undermining green belt objectives and additional infrastructure being either committed or to be funded by the developer.

9. One of the themes throughout the representations is that these South Queensferry housing sites are inappropriate because they constitute large scale (strategic) housing development outwith the 4 strategic development areas within the City of Edinburgh. The fact that the first proposed plan did not include these large allocations indicates that the council's intention was indeed to focus large scale housing development within the strategic development areas. It also remains the case that the majority of the proposed new housing within the plan period is within the strategic development areas.

10. However, as explained by the council in its response above, the SESplan strategy in the approved plan moved away from the restriction to small sites outwith the strategic development areas. In addition, the Supplementary Guidance sets out the requirement for additional housing, and includes an allowance of 2,500 houses within the City of Edinburgh outwith the strategic development areas. I therefore find that there is nothing in the spatial strategy of SESplan that presumes against the allocation of housing on suitable sites on the edge of South Queensferry. Any proposed housing development on the edge of the existing settlement should be examined in a consistent manner to that relating to the proposed housing within the strategic development areas. It should be noted that there are also representations examined in this report which express concern about housing within the strategic development areas as well.

11. Whilst it is also a common theme throughout the representations that brownfield sites should be used before consideration is given to the use of greenfield sites for housing development, I find that there is no evidence to suggest that strategic brownfield opportunities for housing development are being neglected in favour of the use of

greenfield sites. Significant regeneration is being promoted, including housing development, at the Edinburgh Waterfront and in the city centre, and even with this there is still clearly a requirement for further green belt land release. Housing sites are also allocated within the green belt lying within the strategic development areas in South East and West Edinburgh. In the context of the spatial strategy within SESplan, I therefore find that it would be unreasonable to exclude the proposed housing sites just because they are within the green belt outwith the strategic development areas.

12. South Queensferry is separated by green belt from the main City of Edinburgh built up area, but is nevertheless a significant settlement in its own right. Although it is not within a strategic development area, there is no reason in my view why additional housing of an appropriate scale should not be allocated within the settlement in order to contribute to the shortfall in the programmed housing land supply. The town is well connected to the western part of the City of Edinburgh by the A90, and also by the M9 spur and A8 to the south and then to the east. There are bus services from Edinburgh to South Queensferry and Dalmeny Railway Station lies to the east of the built up area of the town, so there are sustainable transport options, although the sufficiency of these and the impact of additional traffic flows on the trunk and local road network are further examined below.

13. South Queensferry is referred to in the representations as a commuter town for those who work within the City of Edinburgh. However, the plan makes provision for employment development throughout the council's administrative area, although I recognise that there are no specific new allocations within South Queensferry. I consider new housing could provide a significant resource to assist with the development of employment opportunities, and this is further examined below particularly with respect to HSG 32. There is no evidence to suggest that there would be any adverse impact on the tourism industry, and I find no direct correlation between the allocation of additional housing sites and the designation of the Forth Railway Bridge as a world heritage site.

14. I therefore find that some extension of the built up area on to green belt land for housing is a proportionate response to the shortfall in the programmed housing land supply, and a detailed examination of the sites in the context of Policy 7 of SESplan is undertaken below in this context.

Consultation on the proposed local development plan

15. Concern is expressed within the representations that there has been insufficient consultation with the local community. I recognise that the main issues report stage provides the primary vehicle for community involvement in the preparation of the local development plan. However, it was incumbent upon the council as planning authority to take into account the SESplan Supplementary Guidance in its preparation of the local development plan, and this identified a need for additional housing sites.

16. Following on from the above, a second proposed plan was published in June 2014 in accordance with paragraph 86 of Circular 6/2013, which included several additional housing sites (including those in South Queensferry) to meet the need identified in the Supplementary Guidance. The council raised awareness with community groups beforehand in order to explain the need for more housing sites, including consideration of sites outwith the strategic development areas. Some people appear to have been unaware of this process, which demonstrates the importance of the main issues report stage as the principal opportunity for consulting stakeholders on the content of the plan and involving the wider public, as stated in paragraph 71 of Circular 6/2013. However, this does not

mean that the proposed plan cannot vary from the preferred options where circumstances (for example the SESplan Supplementary Guidance) may require this.

17. In this context, I refer to the examination of conformity with the participation statement to the effect that such conformity has been demonstrated. The process relating to the second proposed plan included notification of people living close to the proposed additional housing sites, in accordance with paragraph 86 (4) of Circular 6/2013. I therefore find that consultation on the plan has in the circumstances been sufficient, and that no change to the local development plan is required in this context.

Loss of green belt

18. Policy 12 of SESplan requires the local development plan to define and maintain a green belt around Edinburgh, in order to maintain the character of the city and prevent coalescence (unless otherwise justified by the local development plan settlement strategy), direct planned growth to the most appropriate locations and support regeneration, maintain the landscape setting of the city and provide opportunities for access to open space and the countryside.

19. I find that the council's approach reflects the SESplan spatial strategy by directing planned growth to the most appropriate locations. It supports regeneration and minimising the impact on green belt objectives by focusing housing development within the strategic development areas, but not exclusively so.

20. The sites are both in agricultural use, and there are representations stating that HSG 33 constitutes prime agricultural land. Paragraph 80 of Scottish Planning Policy seeks to protect such land but recognises that loss of this land may be justified as a component of the settlement strategy. Most of the agricultural land surrounding Edinburgh is classified as prime agricultural land, and since greenfield land requires to be allocated in order to meet the housing land requirement, I find that there is no basis to remove either of these housing allocations from the proposed plan as a result of productive farmland being lost through development.

21. Being agricultural land, the sites are also therefore not readily accessible for community use, although they may be used informally for recreation, and HSG 33 has a footpath/cycle route running through the eastern part of the site. Owing to the A90 and proposed Forth Road Crossing approach road which is now under construction, both sites are currently isolated from the surrounding countryside, and there may be an opportunity to provide access into the countryside to the south, thus enhancing the opportunities available for access to the wider countryside. There is also an opportunity to develop greenspace along the southern boundaries of both sites, which may provide a valuable resource for active travel by the community. I therefore find that the loss of green belt would not undermine green belt objectives with respect to access to open space and the wider countryside, and that there would in fact be opportunities to enhance such access.

22. Following on from the above, the key issues from the allocation of these housing sites on the objectives of the green belt are maintaining the character of South Queensferry (and preventing coalescence) and maintaining the landscape setting of the southern edge of the built up area of South Queensferry. With respect to the former, there is substantial concern within the representations about the overall increase in the size of the community (added to existing housing development Proposals HSG 1 and HSG 2) resulting from the development of up to an additional 1,500 houses, when this is related to the existing

population of the town. Various estimates are provided within the representations for this, and it has not been precisely quantified by the council, but I recognise that the increase in population would be significant. The important issue though is the extent to which this would be able to integrate with the existing community.

23. The concern within the representations is that the housing development would constitute a substantial addition to the built up area without being properly integrated into the community and that it would thus significantly undermine green belt objectives. For example, there is concern that the links to other parts of the town and the town centre in particular have not been properly considered as part of an overall strategy for the integration of the proposed new housing with the existing community. Part of this is the physical integration of the development with the existing urban area, and the other part is considering the effect of the additional population on the existing transport network, education, health and community facilities, and this is also a separate issue in its own right which is further examined below.

24. I note the council's response that a strategy could be prepared in Supplementary Guidance for South Queensferry, so that the integration of the new development including employment and community uses can be considered. However, this is something that really needs to be assessed before such a significant expansion of the settlement is included within the local development plan, and in this context I also examine the infrastructure requirements further below. I consider that the development principles and site brief should be able to provide all that is necessary for the local development plan to ensure the appropriate integration of the housing development sites into the community.

25. The action programme and masterplans are a further important input to this process, in terms of the detail of development and its timing, but the local development plan should clearly set out the key development and infrastructure principles, so that there is a sufficiently detailed framework for the development management process. The preparation of Supplementary Guidance specific to Queensferry would be at odds with the approach followed in other areas, although the recommendations through Issue 21 support preparation of Supplementary Guidance to detail the approach to infrastructure delivery throughout the plan area. I consider the development principles and site brief in more detail later on, but I now go on to consider the overall physical integration of the sites within the urban area in terms of the effect on the character and landscape setting of the settlement, including coalescence.

Effect on the character of the settlement of South Queensferry

26. At my site inspection I carefully assessed the potential for the physical integration of both sites within the existing urban area. They are relatively large greenfield sites, although they are now bounded to the north by the existing built up area, and to the south by the approach road to the new Forth Road Crossing (with respect to HSG 32), which is currently under construction, and by the A90 with respect to HSG 33. To some extent, both sites form logical infill development, taking the built up area to the new approach road and the A90, which provide substantial and defensible green belt boundaries.

27. Some concern has been expressed within the representations about the impact of new housing development on the character of South Queensferry, including the conservation area and the setting of listed buildings. However there is no conservation area close to either site, and there are no listed buildings in close proximity that would be adversely affected. The northern boundary for HSG 32 is Builyeon Road, which is a busy distributor

road, and this separates the site from the existing housing development which lies to the north. Most of the traffic to the Forth Road Crossing would be expected to use the new approach road from the A90, but there would be additional traffic from the proposed accesses to the site on Builyeon Road.

28. However, new housing development would not have any adverse impact on the residential amenity of the area to the north of Builyeon Road. Furthermore, some integration into the existing community could be provided by linking new footpaths and open space within the site to those which already exist on the north side of Builyeon Road, and by securing environmental improvements to the existing character of Builyeon Road (currently a fairly stark boundary to the existing built up area which is not a friendly environment for people using the bus stops along the road, there being no pavement on the south side of the road) together with a reduction in speed and traffic calming.

29. HSG 33 would form a direct extension of the urban area to the south of the existing housing accessed from Scotstoun Avenue and various associated culs-de sac. From my site inspection, there is a clear opportunity to integrate the development of this site with the existing housing development. The main point of access is likely to be from Provost Milne Grove (in turn from Scotstoun Avenue), with a further access from the B800 south of the Ferrymuir Roundabout. Another access point may be provided where an existing footpath joins Scotstoun Avenue, and since this connects with the existing cycleway, this would be a particularly valuable access point for promoting active travel. The footpath extends to woodland along the southern boundary of the site which is intended to be used for a footpath and cycle access from HSG 32, over the A90, through (or along the boundary of) the site of HSG 33 and extending to Dalmeny Station. This matter is further examined under the heading of public transport and in the development principles below.

30. New housing would have a more direct impact on existing housing than is the case for HSG 32, because existing housing in this case runs directly along the northern boundary of the site. However, I am satisfied in general terms that careful planning of the layout and open space provision at the development management stage, guided by appropriate development principles in the local development plan, would be able to protect the amenity of the existing housing in terms of overlooking and privacy. Further detailed matters relating to the development principles for both sites are raised within the representations, and these are examined further below in this context.

31. In overall terms, I find that the proposed new housing development on both sites would sufficiently integrate with the existing built up area and community of South Queensferry, subject to appropriate mitigation through the development principles (which is further considered below), and that therefore the allocation of these housing sites would not undermine green belt objectives in this context.

Impact on the landscape setting of South Queensferry

32. The impact on the landscape setting does not feature strongly within the representations, but there is one detailed representation expressing concern on this matter. The majority of the site of HSG 32 lies within the inventory site for the Dundas Castle designed landscape to the south. However, the fact that this agricultural land is now separated by the new approach road means that there would be no significant adverse impact on the designed landscape inventory site. This is recognised in the assessment in Volume 2 of the environmental report, which also concludes that whilst housing development on the site would significantly alter the character of the area,

development can nevertheless be integrated into the existing settlement, which is consistent with my findings above. The site of HSG 33 is already substantially severed from the remaining countryside by the A90.

33. Nevertheless, these are both large greenfield sites which currently provide a buffer between the existing urban area and the major trunk road system to the south of the sites, accessing the Forth Road Bridge and the new Queensferry Crossing. I find that they are large open spaces which contribute to the existing landscape setting to the south of South Queensferry. The site of HSG 32 is relatively flat and low lying, but generally rising slightly from the new approach road to Builyeon Road. There are some mature trees along the boundary of the new approach road, but also significant gaps which would potentially make new housing on the site very prominent from the new approach road.

34. HSG 33 is flat and low lying agricultural land, and new housing would be prominent given that the existing housing south of Scotstoun Avenue has very little intervening screen planting. Careful attention to the design and layout, including open space and landscaping of the new housing, would be very important in mitigating any adverse impact on residential amenity. However, as long as appropriate measures are included in the development principles, I am satisfied that this matter could be satisfactorily addressed through the development management process. The details of the development principles are considered further below in this respect.

35. There is substantial woodland along the southern boundary in an area which is known locally as the “dark entry”, containing a footpath/cycleway leading from the southern boundary of the site (centrally located) to the eastern boundary, where it extends as National Cycle Route 1 to Dalmeny. This also extends from the southern boundary up to Scotstoun Avenue, and beyond to various destinations including North Queensferry. There is however very little vegetation screening the site from the A90 to the west of this footpath, and also in the south east corner of the site where it adjoins the A90 which is at this point on an elevated embankment.

36. There is concern expressed in the representations that development of the site of HSG 33 would cause coalescence with Dalmeny, which lies beyond the eastern edge of the site and is accessed by the national cycle route extending east from the site into Dalmeny. However, the development of HSG 2 already extends to the railway line and any housing at the eastern edge of site HSG 33 would simply consolidate the relationship between the eastern edge of South Queensferry and Dalmeny. Essentially, I consider that Dalmeny is already integrated into the overall built up area of South Queensferry, and in particular the railway station is a facility which provides sustainable transport for the whole of South Queensferry.

37. Dalmeny is however separated from South Queensferry by the railway line, and there is no vehicular access directly between the site and Dalmeny. In addition, an open space buffer could be provided at the eastern end of the site. I am therefore satisfied that the character of Dalmeny village can be satisfactorily preserved, and that there would be no significant adverse impact on the landscape setting of the village as result of coalescence with the main built up area of South Queensferry. This matter is however also further examined under the development principles below.

38. In overall terms, with respect to both sites, whilst there would be some adverse impact from housing development on the landscape setting of the southern edge of the built up area of South Queensferry, particularly when viewed from the A90 and the approach to the

new Forth Road Crossing, this could be significantly mitigated by the inclusion of a substantial landscaped buffer, with further tree planting, along the southern boundary of both sites, apart from where the "dark entry" already provides such a buffer to the south of HSG 33. Any more distant views (for example from the Forth road bridges and surrounding countryside) would see the extension of the urban area within the framework of the major trunk roads as a logical extension to the existing built up area. I am therefore satisfied that the development of both sites would not undermine green belt objectives in this context.

Biodiversity

39. I acknowledge that the sites would provide a habitat for local wildlife species, although I note that from the surveys undertaken there is no evidence of activity by badgers or by European protected species. In the event that any such species are subsequently found on the sites, I am satisfied that the interests of such wildlife would be satisfactorily protected by the Conservation (Natural Habitats, &c.) Regulations 1994. There is also no national or local nature conservation designation applying to either site. There is an opportunity to enhance or provide habitats for local species within greenspace retained or provided within the sites. I therefore find that there is no basis to remove these sites owing to any nature conservation value which the sites may have.

Transport infrastructure

Public transport and active travel

40. Significant concerns within the representations relate to infrastructure provision. I commence with an examination of the transport infrastructure, and in this context I examine the provision for public transport and active travel first. The assessment in Volume 2 of the environmental report sets out the accessibility to public transport, which varies across both sites but improves in a northerly direction towards Builyeon Road for HSG 32 and Scotstoun Avenue for HSG 33. There are bus services along both of these roads, and I would not take issue with the findings of the assessment that the sites have good access to public transport, although concern is expressed in the representations about the quality of the public transport services, and this is further examined below.

41. The transport appraisal addendum assesses the traffic flow, public transport mode share and required interventions in order to achieve this. Issues are similar for both sites. The assumed increase in public transport mode share is 7% for HSG 32 and 8% for HSG 33, taking the mode share to 48.1% for HSG 32 and 49.1% for HSG 33. The transport interventions required for HSG 32 are new and upgraded bus stops and bus priority measures (through road widening) on Builyeon Road, and increased capacity and frequency of services to city centre and key local services.

42. In addition a contribution to increasing the capacity of Dalmeny Railway Station car park (including for cycles) is identified, together with the provision of a shuttle bus to the station, although there is no indication of any requirement to extend the capacity of trains running between Dalmeny and Edinburgh City Centre, which is a major area of concern expressed within the representations. A number of provisions for active travel are identified, including high quality pedestrian and cycle routes linking in to existing routes into South Queensferry, and in particular a new footway/cycle path along Builyeon Road together with crossing facilities, and a contribution to a route with a potential bridge over the A90, linking in to the existing footpath/cycle route to Dalmeny town centre and station.

43. For HSG 33 the transport interventions required are new and upgraded bus stops on Scotstoun Avenue and in Dalmeny, and increased capacity and frequency of services to city centre and key local services. A contribution to increasing the capacity of Dalmeny Railway Station car park is also identified for this site, as are similar provisions for active travel linking in to the existing route to Dalmeny Station and towards Edinburgh. There is also a specific requirement for a high quality east/west cycle route through the site to allow the realignment of the existing national cycle route, and connection to HSG 32.

44. I examine how the development principles and site brief relate to these provisions below, and any modifications that are required as a result. Representations suggest that the transport appraisal overestimates the use of bus and underestimates the use of rail transport. However, I have no evidence to show that this is the case. There is also a particular issue relating to Dalmeny Station which is reasonably accessible to HSG 33 at the present time, and is as accessible to HSG 32 as it is to the western part of the existing built up area to the north. However, there appears to be considerable room for improvement in terms of access to the railway station, the parking facilities and the quality of the services, so that rail travel is maximised in terms of being a favourable option for commuter travel. I consider this matter further under the development principles below.

45. However, in overall terms, I find that subject to the incorporation of measures to promote public transport and active travel within the development principles in terms of the above, the proposed development of these 2 sites for housing includes sufficient provision for sustainable modes of transport, and appropriately mitigates the concerns raised within the representations on this matter.

Impact on the trunk and local road network

46. There are significant concerns raised within the representations about the existing level of congestion on the trunk and local road network at peak periods, and the effect of increased traffic flows from these 2 large housing sites, to the extent that this constitutes a basis for the many representations seeking the removal of these sites from the local development plan. There is a secondary position to many of the representations which seeks (in the event that the sites remain allocated for housing in the plan) further appraisal and modelling of the traffic flows to determine what interventions may be required in order to mitigate the increased traffic flows and ease congestion, before the development is committed or takes place. The general implications arising from this are examined within Issue 19, but the assessment of these specific sites in the transport appraisal is considered below.

47. With respect to traffic flow, I note that the transport appraisal addendum identifies a potential 10.6% increase in peak car trips on the A90 (cumulatively) from the new housing sites. There is limited information about the effect of this on the trunk and local road network, and the transport appraisal does not include detailed modelling, which is expected to be carried out as part of the development management process in due course. Transport Scotland has stated that the limited information about the cumulative effect of the new housing development proposals means that transport interventions which may be required for the trunk road network cannot be identified at this time. However, a judgement is still required as to whether appropriate interventions can be delivered within the plan period, to mitigate traffic congestion, if the proposed housing sites are included.

48. The transport appraisal refers to no specific road improvement interventions relating to these 2 sites being required at this time, but indicates that Transport Scotland may require

an impact assessment (from the proposed development) on the new Forth Road Crossing junction. This is symptomatic of the difficulties relating to the effect of the proposed new housing sites on the trunk and local road network examined within Issue 19, and I refer to the findings and recommendations there, including the recommended new policy relating to transport interventions which may be required with respect to the trunk and local road network.

49. Increasing the mode share for public transport, promoting active travel and reducing congestion to a minimum would all contribute to minimising air pollution, which is also a concern raised within the representations. More detailed matters relating to any required improvements to the local road network, and the delivery mechanism for these, is further considered below in examining the development principles and site brief for these sites.

50. In overall terms, I find that there are significant uncertainties with respect to the transport interventions that may be required to the trunk and local road network, in order to mitigate the increased congestion which would be likely to occur. On balance, however, in the context of the findings in Issue 19, I find that these uncertainties would not justify the exclusion of the sites from the local development plan, when considered in the context of the revised policy framework recommended through Issues 19 and 21. A new transport policy would require proposals to address cumulative and cross boundary impacts and Policy Del 1 and its supporting Supplementary Guidance would address the delivery of any required infrastructure. These matters and the required mitigation are further examined in the context of the development principles below.

Education Infrastructure

51. The revised education appraisal identifies improvements to the school infrastructure which are required to meet the education needs arising from the proposed housing allocations in South Queensferry. A total of 332 non-denominational and 51 denominational primary school places are required (also including HSG 34 at Dalmeny). A new primary school (with nursery provision) is proposed within the site at Builyeon Road, and is shown on the proposals map by a symbol as Proposal SCH 10. Additional capacity is also required within the existing primary school network.

52. The exact location of the proposed new school has not yet been identified, and would be dependent on the master planning process. I have no evidence that air pollution would be a matter of concern, notwithstanding the major roads in the vicinity and the new Forth Road Crossing, and in any event it would make little difference where the new school is located with respect to these sites. I accept that a site within HSG 32 would be conveniently located for access from the proposed new housing, particularly if an active travel link is provided between HSG 32 and HSG 33, crossing the A90.

53. There is also significant concern within the representations about the current secondary school provision and whether or not a new high school is to be provided. There is concern about the quality of the existing provision. The revised education appraisal identifies a total of 232 non-denominational and 17 denominational secondary school places being required, and the revised education appraisal states that it will be necessary to undertake a feasibility study to determine the cost and the most appropriate way of delivering the required additional capacity at Queensferry High School. From its response above, I note that the council is seeking funding for a replacement Queensferry High School to be located on the existing site, which will be designed to accommodate new pupils from the proposed new housing sites in the local development plan.

54. The council accepts that proposed housing will add to significant rising rolls and the need for additional school space. It considers that a lead in period of 3 years would allow for the planned provision of the required school infrastructure. The council accepts a potentially significant funding gap between the required works and the anticipated level of developer contributions. However, it states that recognised financial constraints can be addressed through forward and gap funding.

55. There is no technical or expert evidence to dispute the confidence of the council, as education authority, that identified education impacts can be appropriately addressed. Consequently, I find no basis to conclude that these matters justify deletion of the sites. However, this does not negate the emphasis that should be placed on the appropriate and planned provision of this necessary infrastructure.

56. In this context, the proposed plan lacks detail on how this constraint is to be addressed. The reporters consider that the education actions for South Queensferry should be included in Part 1 Section 5 of the plan. However, it is also important that these actions and the council's approach to timeous delivery are further clarified. This would require Supplementary Guidance to provide greater surety about the mechanisms, timing and funding of delivery. These matters are further addressed through Issue 21.
I examine the need for reference to the delivery of education infrastructure in the development principles below.

Other infrastructure

57. Concern has been expressed within the representations about the effect of new housing development on health, leisure and community services. It is considered that improvement of all of these services is required including the provision of a new cemetery. The council has referred to paragraph 72 of the local development plan, which acknowledges the implications for such services from new housing development. Whilst there is no current evidence relating to any required further provision of such services relating to these proposed housing sites, and therefore no justification for the inclusion of such facilities through the development principles relating to these sites, appropriate provision for such facilities could be made through the development management process. This would be in the context of Policy Hou 10 of the local development plan, where any developer contributions would be considered in the context of Circular 3/2012.

58. I have noted that the Queensferry Waste Water Treatment Works has limited capacity, but that Scottish Water does not consider that this should be seen as a barrier to development, and would fund any necessary upgrade. The action programme refers to an upgrade, and developer contributions could also be sought for this, although I do not consider that it is necessary to refer to this in the plan. There is concern expressed about the risk of flooding to site HSG 33, but the Scottish Environment Protection Agency has not requested any additions to the development principles for these sites, with respect to a flood risk assessment being necessary or any required mitigation in this context.

59. I have been notified by the council that the eastern end of site HSG 33 lies within the Health and Safety Executive's consultation zones for an oil storage installation south of Dalmeny. This potential constraint has not been taken into account so far in the allocation of the site for housing development in the local development plan. I understand that the potential effect of this is now being pursued by the prospective developer of the site in consultation with the Health and Safety Executive.

60. The council has stated that the developable area should be reduced to 12.6 hectares, which using the council's standard density range would equate to a range of 312 to 437 units. The developable area could however be as low as 9.84 hectares if no development is possible within the full consultation zone, which although it appears unlikely, is the worst case scenario. I consider this matter further under my examination of the development principles and the scale and capacity of HSG 33 below.

Development principles and site brief

Matters relating to both HSG 32 and HSG 33

61. Following on from Transport Scotland's concerns about the cumulative impact of large scale housing allocations on the trunk road network, which is also examined within Issue 19, I find that provision requires to made for further transport assessments (for both sites HSG 32 and HSG 33), which should include modelling of the cumulative effect of increased traffic flows on the trunk and local road networks (taking into account all known proposed development and any potential cross boundary impacts). This should draw on the conclusions of the council's transport appraisal and further work being carried out to assess the wider cumulative and cross boundary impacts on the trunk road network.

62. The transport assessments should particularly relate to possible improvements to the Queensferry and Scotstoun junctions on the A90, and should identify any appropriate commensurate mitigation as a result of these transport assessments. The required provision is recommended in the General Development Principles under Issue 21, where it is also related to the new Supplementary Guidance proposed through Policy Del 1. A reference to developer contributions towards both junction improvements is included. A requirement to address these general development principles is also recommended within the site specific development principles for both sites.

63. In addition, a provision requires to be made for the improvement (routes and frequency) of bus and rail services which may be required as a result of these proposed housing developments. The provision of additional parking facilities for cars and cycles at Dalmeny Station is also required. These matters are also recommended within the general development principles for these sites through Issue 21. Appropriate consultation should take place with the service providers in order to identify what level of service improvement can be delivered in the plan period. I am satisfied that there is sufficient provision for private vehicle access into South Queensferry without allowing such vehicles to also use the proposed public transport link to the existing Forth Road Bridge. In addition to the above, however, I find that there should be a reference to the upgrading or provision of new bus stops as appropriate within the site specific development principles, in order to provide a basis for the delivery of such through the action programme.

64. Further consideration is given through Issue 21 to the requirement for Supplementary Guidance relating to the delivery of education infrastructure. In this context, further detail is considered to be necessary within the development principles, in order to give confidence to the local community and others that the schools capacity issue will be addressed and that the proposed plan is not promoting development in South Queensferry that will place an unacceptable strain on existing schools. General development principles are therefore recommended on this matter through Issue 21, and my recommendations include a cross reference to these in the site specific development principles relating to these sites.

65. With respect to the timing of new road improvements, public transport, education and

other infrastructure, I find that there should be a statement within the development principles to the effect that development should only progress subject to sufficient infrastructure already being available or where it is demonstrated that it can be delivered at the appropriate time. Such a statement is recommended in the proposed general development principles and Policy Del 1 under Issue 21.

HSG 32 Builyeon Road

66. I note that the stated intention of the prospective developer is to provide 2 vehicular accesses, these being a roundabout access from Builyeon Road to the West, and a traffic light controlled access from Builyeon Road to the east. Notwithstanding the concern expressed in the representations, I have no evidence to find these access points insufficient for the proposed development. However, I find that the first bullet point (simply requiring vehicular access from Builyeon Road) is sufficient in this regard.

67. Given the contribution of the site to the landscape setting of the southern edge of South Queensferry, I find that a substantial landscaped buffer, with additional tree planting, should be provided along the southern boundary of the site with the new approach road. This would also assist in providing appropriate mitigation with respect to noise from the carriageway. I do not recommend a specific measurement of the width in the development principles, which should be informed by the masterplan process, but use of the term substantial is appropriate. I am also satisfied with the existing illustration of this buffer in the diagram, but I would emphasise that the diagram is indicative only and allows flexibility in terms of the eventual width of the corridor.

68. This buffer should be integrated with a similar landscaped buffer (or green network) to be provided within the western part of HSG 33, and should refer to the inclusion within the buffer of a footpath/cycleway bridge over the existing A90 carriageway (which is being retained as a public transport link only to the existing Forth Road Bridge) to the retail and housing area to the east of the site. Whilst I do not consider that further text in the development principles is required for this, I consider that access into HSG 33 should take the most effective user friendly route, if possible linking directly across the B800 into HSG 33 along its southern boundary. The existing second, fourth and fifth bullet points appear in the development principles as unrelated matters, which I consider should be rationalised and enhanced to provide an integrated approach to the provision of this combined landscaped buffer and significant active travel opportunity. The latter is an important element in promoting sustainable transport for the site.

69. The third bullet point should be enhanced, promoting active travel throughout the site, across an improved Builyeon Road, and connecting into the existing footways linking to the residential development to the north of the site and the town centre. More detail should be provided, whilst allowing flexibility and avoiding too much prescription of the measures to be taken. To some extent this addresses the council's suggestion relating to an overall strategy for the integration of this development site into the existing community.
A bullet point should also be included to address the concern expressed in the representations about the potential detrimental impact of footpaths and cycleways in existing residential areas.

70. I find that all of the above could be more simply achieved through the development principles than a requirement for statutory Supplementary Guidance. I provide appropriate revised bullet points in my recommendations below relating to the landscaped buffer and active transport corridor through HSG 32 and HSG 33 and into Dalmeny, and the

promotion of active travel throughout the site, and integrating with the urban area to the north including the town centre. These revised bullet points would guide the continuing masterplan process.

71. The bullet point relating to a new primary school towards the centre of the site should be retained as currently written, but the seventh and ninth bullet points should be combined into a rationalised bullet point relating to the opportunity for commercial and community uses within the site as a whole (including the north west and north east part of the site). I take into account the submission on behalf of the prospective developer of the site which indicates that such uses could also be provided in the north east part of the site, opposite those already existing on the north side of Builyeon Road. The locations shown on the diagram should be removed in favour of the revised text, in order to retain flexibility, as it may be the case that the sites shown are of an insufficient size for what may be proposed, and in any event they do not appear to correlate with the submission on behalf of the prospective developer of the site. I am satisfied however that such uses could be incorporated into the overall development, subject to appropriate landscaping in order to protect residential amenity, which would also be sufficiently addressed through the development management process.

72. The opportunity for the redevelopment of the area occupied by existing commercial uses to the north of Builyeon Road should be retained, together with the possible relocation of those uses into the site. I note the concern expressed in representations, with respect to the need to retain the existing woodland between the service area and adjacent residential development. However, this matter could be sufficiently addressed at the development management stage with respect to any proposed redevelopment. I do not consider that the indicative representation of a new footpath/cycle path in this area would undermine the amenity of this area of woodland. The opportunity for the redevelopment of the redundant north bound carriageway of the A90 to the east of the site should also be retained. I understand that this results from the link to the existing Forth Road Bridge being retained solely for public transport.

73. This may assist the pedestrian/cycle crossing of the A90 to the east of the site, which might be acceptable as an “at grade” crossing given the reduced traffic flow along the carriageway. I have not recommended the inclusion of this possibility this into the development principles owing to uncertainly about what is proposed with this public transport link, and the fact that further investigation of the location and nature of the crossing is clearly required. However, the text within the development principles for both HSG 32 and HSG 33 (as amended) would allow for further consideration of this through the masterplan process.

74. There are also representations concerning the standards of provision of open space and tree planting within the site. Following my consideration of the development principles for HSG 33, I find that a similar bullet point to that in HSG 33 should be provided in order to provide new local greenspace in accordance with open space strategy standards. I agree that views to the Pentland Hills ought to be retained where possible, but I find that this is essentially a matter for the development management process, and does not need to be included within the development principles.

75. Greenspace and active travel links to HSG 1 and to the wider countryside across the new Forth Road Crossing approach road could possibly be provided, but I find that there is insufficient evidence to indicate the extent to which this might be possible, and it also in my view extends beyond what would be reasonable for the development principles relating to

HSG 32 to include. I find that any further consideration relating to these matters should be pursued through the existing policy framework in the local development plan, or separately through the development management process. However, this is also a matter which could be considered in the next review of the local development plan. The same principles apply to HSG 33 with respect to access across the existing A90.

HSG 33 South Scotstoun

76. I am satisfied with the proposal on behalf of the prospective developer for 2 primary vehicular access points, one from the B800 to the west of the site, and the other from Scotstoun Avenue using Provost Milne Grove. Access could be provided from the B800 at a sufficient distance from the Ferrymuir Roundabout and from the new access for public transport to the existing Forth Road Bridge. I consider that there should however be a provision for no through traffic (apart from possibly buses using an appropriate bus gate) to avoid the creation of a rat run from the B800 to Scotstoun Avenue. From my site inspection, I find that there is sufficient space for the access from Provost Milne Grove into the site, whilst maintaining a satisfactory level of residential amenity.

77. I note that there is an indication of a further possible vehicular access at the eastern end of the site from Scotstoun Avenue shown on the diagram, and I find that this should be retained to allow for flexibility, although it appears to me that this is likely to be primarily for cycle and pedestrian access to the site, using National Cycle Route 1. It would however be appropriate to state that there should be no vehicular access from the eastern end of the site into Dalmeny.

78. Concern is expressed in the representations with respect to road and pedestrian safety on Scotstoun Avenue as a result of the proposed new housing development. There would be additional traffic flow along this residential street, which already serves significant housing development to the north and south, although through the masterplan process consideration could be given to maximising the use of the proposed vehicular access from the B800, in order to reduce as far as possible the traffic on Scotstoun Avenue. I note that it is a bus route and already serves the development of HSG 2 to the east. Whilst I would encourage this course of action, Scotstoun Avenue appears to me to be of a standard which would allow some increase in traffic flow, and I therefore do not consider that any quantification of the proportion of the site served by each access would be appropriate within the development principles at this stage.

79. I consider that the junction between Kirkliston Road and Scotstoun Avenue (at the Ferrymuir Roundabout) is likely to be sufficient to accommodate increased traffic flows, in addition to any further development (for commercial or housing development) to the east of HSG 32, but that in any event this is subject to further traffic assessment and modelling required through the general development principles. Scotstoun Avenue may also be considered for further improvement and traffic calming following this process.

80. I find that the third bullet point is generally appropriate in its existing form, but I also find that an additional bullet point is required for the creation of a new footpath/cycleway extending from HSG 32, across the A90 and B800, through HSG 33 and linking to the existing footpath/cycleway (National Cycle Route 1) extending into Dalmeny to the east, and North Queensferry to the north. This complements a similar bullet point recommended for HSG 32. From my site inspection, I note that the existing footpath/ cycleway links into key facilities in the urban area east and north of the Scotstoun area, including Dalmeny Station, Queensferry High School and a sports and community hub.

81. Whilst I find that the second bullet point is also generally appropriate, I consider that there should be a further bullet point to refer to pedestrian and cycle links to the existing residential areas to the north and the town centre, thus extending the development principles for HSG 33 in a similar manner to those with respect to HSG 32, and tying in to the connectivity already provided by National Cycle Route 1. There should also be a reference to the upgrading of bus stops referred to in the action programme. The fourth, fifth and sixth bullet points should remain.

82. HSG 33 is a much smaller site than HSG 32, and whilst an area for community facilities could be considered as part of the masterplan process, I find that there is no justification at this stage for requiring this through the development principles. However, I consider that it is necessary for some form of landscaped buffer (but with limited tree planting as this is not a green belt boundary) to be provided along the northern boundary of the site adjacent to the existing housing. An additional bullet point should be added for this, indicating that careful consideration requires to be given to the layout and design of the proposed new housing and associated open space, in order to protect the residential amenity of the houses directly overlooking the site and the proposed access at Provost Milne Grove. I do not however consider that any illustration of this is required on the diagram, and the amenity of houses overlooking the proposed access on Provost Milne Grove would be taken into account under this bullet point. I find no justification for a blanket restriction of new housing to 1½ storey, despite a representation on this matter.

83. I also note the constraint referred to above, relating to the safeguarding zone for the BP oil storage installation. I consider that this requires to be identified on the diagram (in terms of the information provided by the council) and referred to in a bullet point, indicating that within this area it may not be possible to build houses, or there may at least be a restriction on the number and location of houses. Any areas not developable for housing should be retained as open space. The effect of this on the capacity of the site for housing is further considered below.

Size of the sites and scale of the proposed development

84. There are representations to the effect that if the sites are retained within the plan, the development areas should be reduced in size (in favour of more open space or woodland, or the provision of recreational facilities, for example) and the indicative capacity for housing on the sites should be reduced. In addition, environmental and infrastructure constraints together with changes to the development principles referred to above may reduce the overall capacity of the sites for development. The council has used its standard density range as identified in Volume 1 of the environmental report and multiplied this by the developable area of the sites (from the assessment in Volume 2). I find that there is no reason in general terms for any exceptions to the standard density range on the subject sites, but that the developable areas need to be further examined.

85. Subject to providing for active travel, amenity, open space and woodland, and infrastructure in the development principles referred to above, I find that it is appropriate to make full use of both sites and maximise the contribution that they can make to the programmed housing land supply. This is particularly so given the shortfall in the programmed housing land supply identified through Issue 5. In this context, I note the council's submission with respect to the capital coalition motion from May 2014, to the effect that the council sees merit in removing or reducing the capacity of the 2 South Queensferry sites (amongst others), in the event that the site east of Millburn Tower (Issue 14) is allocated for housing development in the plan. I refer to the findings on this matter in

Issue 14, and the conclusion that this site should not be allocated for housing in the local development plan. I therefore find that the allocation the sites in South Queensferry depends upon my examination of these sites within this issue, and that the capital coalition motion does not alter my conclusions in this context.

86. Looking at the developable areas and the overall capacity of the sites in relation to this, I find that the submissions on behalf of the prospective developers of the sites need to be taken into consideration. For HSG 32, I note that a transport statement has been submitted, concluding that the site would be accessible by sustainable modes of travel, would integrate with the existing and future transport network and can be safely accessed without compromising the safety or efficiency of existing road users. For HSG 33 there is a section on access within the supporting information submitted with respect to the site. This analyses the sustainable transport options, including Dalmeny Railway Station, and concludes that the site is well located for access to public transport services (including Dalmeny Station), and to the A90 which provides access to the wider road network of Central and Southern Scotland.

87. In general terms this is consistent with my findings above, and in particular it does not fully address the cumulative impact on the trunk and local road network from the proposed new housing sites in the context of the new Forth Road Crossing. However, I find that it is not possible to assess the impact of this on the overall capacity of the sites, which should therefore be based upon the standard density range, but adjusted as appropriate to take into account the requirements of the development principles. From these development principles, I find that the indicative capacity of HSG 32 should remain as proposed by the council within Table 4. I find that this is the best estimate which can be provided at this time. Essentially, the purpose of this is to demonstrate how the site is likely to contribute to the programmed housing land supply. The eventual capacity of the site will be dependent upon meeting the development principles referred to above, and the consideration of proposals through the development management process.

88. For HSG 33, however, I find that the assessment of the capacity of the site is somewhat more complex. I note the submission on behalf of the prospective developer to the effect that the current developable area is 16.5 hectares rather than 20 hectares (which is the figure in Table 4), and I note the concern expressed that the eventual capacity is likely to be nearer the minimum figure of 365 houses. However, this appears to have been overtaken by events in that a draft scheme of 474 houses appears to have been prepared through pre-application consultation (in preparation for the submission of a planning application). This is now being discussed with the Health and Safety Executive (as a result of the constraint referred to above), and the council is suggesting a figure of 365 houses as a mid point in the range of 312 to 437 houses. In overall terms, I find that this is as near to a best estimate as is likely to be achieved, taking into account the safeguarding constraint which was not initially considered when the local development plan was prepared.

Overall Conclusion

89. I conclude in overall terms that the development of these sites for housing would make a significant contribution to the housing land requirement. The fact that they are outwith a strategic development area does not exclude them from consideration. I do not consider that the objectives of the green belt would be significantly undermined. In particular, I find that the proposed new housing development on both sites would sufficiently integrate with the existing built up area and community of South Queensferry, and that the impact on the landscape setting could be significantly mitigated by the inclusion of appropriate

landscaping along the southern boundary of both sites.

90. Development would generally be seen as a logical extension to the existing built up area, and housing would otherwise be acceptable in environmental terms. I am satisfied that sufficient infrastructure is capable of being provided within the policy context as set out elsewhere in this report through Issues 19 and 21, and that site constraints are capable of being mitigated. The capacity of HSG 33 however requires to be reduced in this context.

91. All of the above is however subject to the modification of the development principles and site brief in the terms set out in the recommendations below, including the general development principles recommended through Issue 21. I conclude that (subject to such modifications) HSG 32 (Builyeon Road) and HSG 33 (South Scotstoun) should remain designated in the plan for housing development as shown on the proposals map.

HSG 34 Dalmeny

92. HSG 34 is a relatively small site of only 1 hectare, with an indicative capacity of between 12 and 18 houses. It appears to currently be a paddock or small area of pastureland. It is bounded by existing housing in the village of Dalmeny to the south and west and by Bankhead Road to the east. The northern boundary adjoins agricultural land to the north, and there is already fairly extensive vegetation along this boundary.

93. The site is not of any strategic significance, and in the circumstances the site's contribution to the housing land supply is marginal. Although the site would be covered by the general development principles which relate to South Queensferry, and my recommended addition to the development principles includes reference to this, I find that there would only be a slight impact upon transport and education infrastructure in the context of the general development principles. However, a commensurate contribution may be required for such infrastructure in the context of Policy Del 1. In any event, whether or not the site should be retained in the plan (and if so, the extent of any modifications to the development principles) essentially depends upon my assessment of the environmental impact of development and the infrastructure that is necessary to support housing development on the site.

94. Dalmeny is a small conservation village, and the site lies within the conservation area. The site is also part of the existing green belt. I accept that the site enhances the existing conservation area, forming a natural greenspace within the village. However, and particularly as a result of the site being clearly separated by mature vegetation from the agricultural land to the north, it does not in my view contribute significantly to the setting of Dalmeny, or the objectives of the green belt.

95. The character of the local architecture surrounding the site needs to be preserved, but I am satisfied that an appropriate layout and design of development can be achieved which would preserve the character and the appearance of the conservation area. The amenity of adjacent dwellings could also be sufficiently protected at the development management stage through careful layout and design. The fourth bullet point in the development principles refers to the retention of view corridors from Main Street to the Forth Road Bridges.

96. I do not consider that a development of up to 18 houses would have any significant adverse effect on the local road network. In addition, Dalmeny Station is relatively close and there are bus services through the village. I note that the action programme includes

reference to upgrading bus stops in Bankhead Road/Main Street, and I therefore consider that this should be included in the development principles, in particular to maintain consistency with the approach to the sites in South Queensferry.

97. One of the major issues raised in the representations is concern about the prospect of access from Wester Dalmeny Steading to the west. However, although this is shown within the submissions supporting representations for the allocation of the site from the prospective developer, the first bullet point of the development principles indicates that development would be taken from Bankhead Road. I find that this would be appropriate, and therefore concerns about access being taken from Wester Dalmeny Steading are not in the circumstances relevant. The second bullet point refers to pedestrian access from Main Street, which I consider to be appropriate. There is no evidence of any other significant infrastructure constraints to the development of the site for housing.

98. In overall terms, I conclude that the allocation of this site for housing in the local development plan would not undermine green belt objectives, and would preserve the character and the appearance of the conservation area. The development principles are generally appropriate in providing appropriate guidance for the consideration of proposals through the development management process. Apart from the inclusion of upgrading bus stops in Bankhead Road/Main Street as referred to above, and reference to addressing the general development principles on transport and education, I conclude that no modification to Table 4 or the development principles is required with respect to this site.

Reporter's recommendations:

Modify the proposed plan by:

1. Revising the bullet points within the development principles for Builyeon Road (HSG 32) as follows:

   - address the General Development Principles on transport and education for South Queensferry set out in paragraphs 123 to 125 above.

   - vehicular access to be taken from Builyeon Road (A904).

   - a substantial landscaped buffer, with additional tree planting, should be provided along the southern boundary of the site with the new approach road, as shown on the diagram. The landscaped buffer should be of sufficient width to soften the visual impact of development on the site from the new approach road, provide a robust green belt boundary and mitigate noise impact. Additional tree planting should constitute native woodland species, and have regard to any ecological mitigation measures specified as part of the replacement crossing and oil pipeline.

   - the landscaped buffer should integrate with that provided within the western part of HSG 33, with an opportunity to incorporate a footpath/cycleway, including a bridge over the existing A90 carriageway (which is being retained as a public transport link only to the existing Forth Road Bridge) to the retail and housing area to the east of the site.

   - opportunity to change the character of Builyeon Road (A904), through street design including new development frontage with the road where this is possible, upgrading

or providing of new bus stops or shelters, roadside footpaths and traffic calming (including reducing the speed limit through traffic regulation orders).

- new pedestrian/cycle routes (taking into account the Forth Replacement Crossing as appropriate) should be provided, particularly forming north-south path connections by linking new pedestrian/cycle routes to the existing network north of the A904, thus allowing the new housing to integrate fully with the existing urban area including the town centre to the north of the site. The use of avenue tree planting and retention/re-use of the existing stone wall is encouraged.

- the residential amenity of existing housing should be taken into account in the design of all new pedestrian/cycle routes and links.

- landscape effects of any noise attenuation measures to be considered in terms of site design and appearance.

- include a new primary school towards centre of site.

- opportunity for commercial and community uses within the site, possibly in the north west and north east parts of the site where they could also form part of the frontage to the main road. There is also a possible redevelopment opportunity with respect to existing commercial uses to the north of the site (which could be incorporated into the development on the site) and with respect to the redundant northbound carriageway to the east of the site.

- provision of new local greenspace in accordance with open space strategy standards.

2. Deleting the opportunity for commercial development shown on the diagram for HSG 32.

3. Revising the estimated capacity in Table 4 for South Scotstoun (HSG 33) to a new specified range of 312 to 437 houses.

4. Revising the bullet points within the development principles for South Scotstoun (HSG 33) as follows:

- address the General Development Principles on transport and education for South Queensferry set out in paragraphs 123 to 125 above.

- vehicular access to be taken from B800 Queensferry to Kirkliston Road and Provost Milne Grove. However there should be no provision for traffic through the site between the B800 and Scotstoun Avenue, apart from buses in the event that this is considered appropriate using a bus gate. There should be no vehicular access from the eastern end of the site into Dalmeny. Appropriate traffic calming measures may be considered for Scotstoun Avenue.

- retain field trees and supplement the existing tree lined track along the southern boundary with new native woodland of minimum 20 metres depth to extend the existing green network along the whole southern boundary of the site as shown on the diagram, thus establishing a new robust green belt boundary along the A90, and

connecting woodland habitat. Opportunity to replace coniferous plantation with mixed native woodland, and provide street planting where appropriate.

- opportunity to provide a new footpath/cycleway extending from HSG 32, across the A90 and B800, along the western part of the southern boundary within the extended green network, linking to the existing footpath/cycleway (National Cycle Route 1) extending to Dalmeny to the east, and North Queensferry to the north.

- opportunity to change the character of the B800 through street design, also enabling path connections across the B800, thus facilitating the new footpath/cycleway referred to above.

- new pedestrian/cycle routes should be provided, forming north-south path connections, thus allowing the new housing to integrate fully with the existing urban area including the town centre to the north of the site.

- the need to respect the residential amenity of existing housing should be taken into account in the design of all new pedestrian/cycle routes and links.

- bus stops should be upgraded as appropriate on Kirkliston Road, Scotstoun Avenue and in Dalmeny.

- careful consideration should be given to the layout and design of the proposed new housing and associated open space, in order to protect the residential amenity of the houses directly overlooking the site along the northern boundary and along the proposed access at Provost Milne Grove.

- landscape effects of any noise attenuation measures to be considered in terms of site design and appearance from A90.

- new development to front onto the green network and provide natural surveillance.

- provision of new local greenspace in accordance with open space strategy standards.

- proposals should take into account the restrictions resulting from the safeguarding zone for the oil storage installation shown on the diagram, where it may not be possible to build houses, or there may be a restriction on the number and location of houses. Any areas not developed for housing should be retained as informal open space.

5. Including the safeguarding zone for the oil storage installation on the diagram for South Scotstoun (HSG 33) in terms of the information provided by the council.

6. Adding bullet points to the development principles for Dalmeny (HSG 34) as follows:

- address the General Development Principles on transport and education for South Queensferry set out in paragraphs 123 to 125 above.

- upgrading of bus stops in Bankhead Road/Main Street.

Issue 11 Appendix A - HSG 32 Builyeon Road

0005	Georgina Hay
0079	Robin Morris
0087	Peter FitzGerald
0121	Richard & Catherine Oakley
0333	Andrea Robertson
0374	Sharon Howat
0474	Kim Venton
0495	David Donnelly
0552	Tony Jones
0553	Pat Jones
0618	Graham Sutherland
0667	Leslie Chapman
0622	Evelyn Sutherland
0668	Karen Balanowski
0693	Louise Beattie
0716	Denise Havard
0717	Lindsay Agnew
0978	Karen Grant
1033	Robert Robertson
1098	Barbara Mathieson
1053	Pamela Fowler
1583	Leigh Dingsdale
1589	Edward Kelly
1786	Catherine Bolan
2016	Samantha MacNeil
2040	Diane Job
2041	S J Gaw
2087	Ivor Murray
2107	Patrice Reid
2110	Ivor Murray
2162	Frances Kirkwood
2188	Martin Seagroatt
2193	Carol Kelly
2206	Claire Smith
2208	Kenneth Morrison
2214	Stuart MacNeill
2231	Sheila Page
2235	Deborah Connell
2238	Derek Ritchie
2327	Lorna Law
2348	Karen Solley
2380	Moira Fraser
2381	Debbie Murray
2420	John Shaw
2434	Fiona Duncan
2477	Iain MacRobert
2479	Yvonne Kennedy
2603	Tricia Fraser
2614	Moira Lyne
2618	Caroline Bell
2674	Vicky West

Issue 11 Appendix B - HSG 33 South Scotstoun

0005	Georgina Hay
0160	Mr & Mrs Ritchie
0231	Alastair Thomson
0242	Iain Russell
0300	Iain Scott
0340	Fiona Carvel
0363	John Halliday
0374	Sharon Howat
0481	J Dodgson
0552	Tony Jones
0553	Pat Jones
0576	Joan Proven
0584	Lisa Topping
0618	Graham Sutherland
0622	Evelyn Sutherland
0688	David Willis
0693	Louise Beattie
0716	Denise Havard
0717	Lindsay Agnew
0919	Jill Woodley
0933	Nicholas Gracie Carmichael
0991	Sandra Jackson-Bass
1006	John Boyd
1045	Johan Harrower
1053	Pamela Fowler
1098	Barbara Mathieson
1100	Nicholas Jackson-Bass
1200	Julie Devlin
1484	Lorna Duffin
1589	Edward Kelly
1689	Susan MacNeil
1729	Katharine Ness
1786	Catherine Bolan
1794	Christine Wood
2016	Samantha MacNeil
2087	Ivor Murray
2206	Claire Smith
2128	Diane Hogg
2162	Frances Kirkwood
2208	Kenneth Morrison
2220	Chris Ward
2325	Donald Jackson
2348	Karen Solley
2380	Moira Fraser
2381	Debbie Murray
2420	John Shaw
2434	Fiona Duncan
2477	Iain MacRobert
2512	Linda Macleod
2531	Patrice Reid
2562	Joanne Underhill
2603	Tricia Fraser
2614	Moira Lyne
2618	Caroline Bell
2674	Vicky West

Issue 11 Appendix C - HSG 34 Dalmeny	
0005 Georgina Hay 0231 Alastair Thomson 0333 Andrea Robertson 0340 Fiona Carvel 0363 John Halliday 0531 Helen Kingan 1042 Fiona Christie 1053 Pamela Fowler 1786 Catherine Bolan 2016 Samantha MacNeil 2082 Susan and Alan Williamson 2087 Ivor Murray 2162 Frances Kirkwood 2208 Kenneth Morrison 2231 Sheila Page 2307 David Murdoch 2348 Karen Solley 2352 Collin 2358 Keith and Hazel Hogg 2380 Moira Fraser 2381 Debbie Murray 2420 John Shaw 2492 John T Carson 2531 Patrice Reid 2603 Tricia Fraser 2618 Caroline Bell 2674 Vicky West	

Issue 11 Appendix D - HSG 32 & HSG 33	
0005 Georgina Hay 0079 Robin Morris 0092 Ralph Barker 0308 David A Garner 0374 Sharon Howat 0526 Janis Cummings 0618 Graham Sutherland 0622 Evelyn Sutherland 0631 Ann Morrison 0694 John and Mrs McCran 0841 Claire Lumsdaine 1044 Jeanette McIvor 1488 Alan Richardson 2040 Diane Job 2041 S J Gaw 2193 Carol Kelly 2301 John Adams 2456 Mr & Mrs J Chapman 2453 Robert Campbell 2492 John T Carson 2614 Moira Lyne	

Issue 11 Appendix E - HSG32/HSG33/HSG34	
0120 Susan Simpson 0228 Shiona Campbell 0308 David Garner 0340 Fiona Carvel 0366 Steve Martin 0428 Paul Stuart 0438 Morag Goulden 0653 David Greig 0655 Margaret Wootherspoon 0689 Margaret Brown 0695 Marina Shaw 0974 Laurence Wotherspoon 1656 Jeanette Harper 1786 Catherine Bolan 1974 Colin Campbell 1985 Maggie Quayle 2000 Pam Smart 2016 Samantha MacNeil 2045 Stephen McKee 2048 Duncan Smith 2132 Jayne Smith 2137 David Neill 2173 K J Wilson 2206 Claire Smith 2249 D Buntin 2306 Keith Giblett 2335 Stephen Stevendale 2350 Katja Wuendrich 2393 Juliette Summers 2398 Neil Grant 2405 Matthew Smith 2407 Niall Urquhart 2420 John Shaw 2422 Cara Gray 2475 James Cowper 2492 John Carson 2506 Karen Stirling 2551 Ken Kirkcaldy 2603 Tricia Fraser	

Issue 12	**New Greenfield housing proposals in South West Edinburgh**	
Development plan reference:	**HSG 35 Riccarton Mains Road, Currie** **HSG 36 Curriehill Road, Currie** **HSG 37 Newmills Road, Balerno** **Part 1 Section 3 Table 4 pages 25 – 27** **Site Brief pages 72 – 73**	**Reporter:** Allison Coard

Body or person(s) submitting a representation raising the issue (including reference number):

147 individuals seeking removal of HSG 35 Riccarton Mains Road (see Issue 12 Appendix A)

158 individuals seeking removal of HSG 36 Curriehill Road (see Issue 12 Appendix B)

193 individuals seeking removal of HSG 37 Curriehill Road (see Issue 12 Appendix C)

47 individuals seeking removal of HSG 35, 36 & 37 Newmills Road (see Issue 12 Appendix D)

Organisations, elected representatives and individuals other than those in Issue 12 Appendix A, B, C & D:

0108 E McNally
0170 Balerno Community Council
0305 Colinton Amenity Association
0321 Ratho & District Community Council
0480 Currie East Neighbourhood Watch
0685 CALA Management Ltd
1252 Michael Crowe
1342 Iain Proudfoot
1565 Gordon Macdonald MSP
2126 Cockburn Association
2274 CALA Management
2280 Mr and Mrs Philip and Barratt David Wilson Homes
2189 Currie Community Council
2699 Scottish Environment Protection Agency
2706 Juniper Green Community Council

Provision of the development plan to which the issue relates:	These provisions of the Plan deal with the proposals for new housing allocations (HSG 35 Riccarton Mains Road, HSG 36 Curriehill Road and HSG 37 Newmills Road) in South West Edinburgh.

Planning authority's summary of the representation(s):

CONTEXT

HSG 35 Riccarton Mains Road was also identified as a housing proposal (HSG 28) in the first Proposed Plan (March 2013). This was in accordance with the Proposed SDP's version of Policy 7 which allowed greenfield housing releases outwith the Strategic Development Areas that were 50 units or less in size.

The context of the approved SDP and its Supplementary Guidance mean that the Second Proposed Plan has had to allocate additional sites, but has been able to do so partly on large sites outwith the West and South East Strategic Development Areas. The sites in South West Edinburgh include;

- HSG 35 Riccarton Mains Road
- HSG 36 Curriehill Road
- HSG 37 Newmills Road

Representations seeking removal of HSG 35 Riccarton Mains Road

Seek removal of HSG 35 on the grounds of one or more of the reasons listed below:

- **Site Selection** – The proposed site is in the green belt and therefore, contrary to normal planning procedures. Brownfield should be developed before greenfield sites. The site is on high quality agricultural land which is required for future food production. Will reduce the amenity of the area.
- **Transport Infrastructure –** The proposed housing allocation would lead to increased traffic flows on Lanark Road West and Riccarton Mains Road.
- **School Infrastructure** – Concerned about the increased pressure on local schools
- **Community Facilities** – Local medical and dental facilities are already near to their capacity.
- **Air Quality and Pollution –** Concerned about increased noise and air pollution. There are already high pollution figures for Gillespie Crossroads. The site has previously been monitored for landfill gases and contamination, which would be a potential safety problem to nearby residents.

(1565 Gordon Macdonald MSP; 2706 Juniper Green Community Council; 147 individuals listed in Issue 12 Appendix A)

Supports allocation of HSG 35

- The Edinburgh Green Belt Study 2 Landscape Character Assessment 27 indicates that there is a limited capacity for development in this area and thus, agrees with this assessment. **(2126 Cockburn Association)**

Representations opposed to HSG 35 Riccarton Mains Road in current form and seeking its removal and/or change

- Supports HSG 35 as a housing allocation, but seeks amendment of the site capacity from 25-35 to 20. CALA have now taken legal control of the subjects and have further assessed the site, its restrictions and development capability to fully inform the proposals. As noted within figure 3 on p5 of the supporting report, the stand-off required from the overhead power lines, and open space requirements define the net developable area of the site. Considers that a reduced capacity will provide a higher quality residential environment. **(2274 CALA Management)**

Representations seeking removal of HSG 36 Curriehill Road

Seek removal of HSG 36 on the grounds of one or more of the reasons listed below:

- **Site Selection** – The proposed site is in the green belt and therefore, contrary to normal planning procedures. Brownfield should be developed before greenfield sites. The site is on high quality agricultural land which is required for future food production.
- **Transport Infrastructure –** The proposed housing allocation would lead to increased traffic flows on an already congested Lanark Road West and the narrow

Curriehill Road.

- **School Infrastructure** – Concerned about the increased pressure on local schools. States that the primary school is already at capacity.
- **Community Facilities** – Local medical and retail facilities are already near to their capacity.
- **Biodiversity and Natural Habitat –** Concerned about loss of habitat for wildlife. Hedges provide nesting sites for birds.
- **Air Quality and Pollution –** Concerned about increased noise and air pollution from the increase traffic.
- **Recreational Amenity –** The site is popular with dog walkers and children. It provides safe pedestrian access to the Station for local residents of Currie.

(1565 Gordon Macdonald MSP; 2706 Juniper Green Community Council; 158 individuals listed in Issue 12 Appendix B)

Supports allocation of HSG 36

- The Edinburgh Green Belt Study 2 Landscape Character Assessment 27 indicates that there is a limited capacity for development in this area and thus, agrees with this assessment. **(2126 Cockburn Association)**

Representations opposed to HSG 36 Curriehill Road in current form and seeking its removal and/or change

- Review of the surface water 1 in 200 year flood map shows that small areas may be at risk of flooding. Amend Table 4 and development principles for HSG 36 Curriehill Road to include 'the finalised site capacity design and layout should be informed by an adequate flood risk assessment'. **(2699 Scottish Environment Protection Agency)**
- Support the allocation of HSG 36. However, requests removal of references to retail units in bullet 4 of the HSG 36 Curriehill Road site brief. Considers this location to be inappropriate for the location of such uses as this would adversely impact upon and detract from the role of the central area of Currie as the retail/commercial core area for the settlement. This is reinforced by the recent failure to obtain retail interest on the site of the former Currie Primary School, reinforcing the strategic retail role of the Gyle and Hermiston Gait as primary retail destinations for the wider area and the local role of Currie in terms of retail provision. **(0685 CALA Management Ltd)**
- Curriehill Road to be widened or straightened at the railway bridge to cope with increased vehicle traffic. States that an already restricted and tight junction will become further compromised leading to damage of the railway bridge and cause a possible railway incident. **(1252 Michael Crowe)**

Representations seeking removal of HSG 37 Newmills Road

Seek removal of HSG 37 on the grounds of one or more of the reasons listed below:

- **Site Selection** – The proposed site is in the green belt and therefore, contrary to normal planning procedures. Brownfield should be developed before greenfield sites. The site is on high quality agricultural land which is required for future food production. Development on the site would lead to coalescence between Balerno and Currie.

- **Transport Infrastructure –** The proposed housing allocation would lead to increased traffic flows onto an already very congested A70 (Lanark Road West). Concerned about the impact of more people using the rail link into Edinburgh.
- **School Infrastructure** – Concerned about the increased pressure on local schools
- **Community Facilities** – Local medical and dental facilities are already near to their capacity.
- **Biodiversity and Natural Habitat –** Concern over loss of natural habitat.
- **Air Quality and Pollution –** Concerned about increased noise and air pollution from the increase in traffic in the area.
- **Recreational Amenity –** The green belt is an amenity enjoyed by the local community. Loss of this land would impact on the quality of life.

(0170 Balerno Community Council; 1565 Gordon Macdonald MSP; 2280 Mr and Mrs Philip and Barratt David Wilson Homes; 2706 Juniper Green Community Council; 193 individuals listed in Issue 12 Appendix C)

Representations opposed to HSG 37 Newmills Road in current form and seeking its removal and/or change

- Reduce numbers of houses being proposed. **(0108 E McNally)**
- Supports land allocated at HSG 37. However, objects to the proposed housing capacity of 170-245. Suggests reducing the housing capacity to 160 units. Given the sites location on the edge of the settlement, topography and land requirements for roads and landscaping, and at a density of 25 dwellings per hectare, a capacity of 160 units is achievable. If more than 160 units can be achieved through detailed site design then this would be supported. **(0685 CALA Management Ltd)**
- Delete the 3rd bullet in the Newmills Road development principles and insert 'access to the site from Lanark Road West via Newmills Road'. Add a new principle – 'new greenspace with trees within the site to meet the Council's greenspace standard.' Reduce the number of units allocated on HSG 37 Newmills Road and increase greenspace/woodland to alleviate coalescence**. (2126 Cockburn Association)**

Representations seeking removal of HSG 35, HSG 36 & HSG 37

Seek removal of HSG 35, HSG 36 & HSG 37 on the grounds of one or more of the reasons listed below:

- **Site Selection** – The proposed site is in the green belt and therefore, contrary to normal planning procedures. Brownfield should be developed before greenfield sites. The site is on high quality agricultural land which is required for future food production. Development on the site would lead to coalescence between Balerno and Currie. Concerned that the villages along the Water of Leith valley would lose their identity.
- **Transport Infrastructure –** The existing road network on the west of the city is already under intense pressure and developments on the scale indicated would lead to further congestion.
- **School Infrastructure** – Concerned about the increased pressure on local schools. New schools will be required to be built.
- **Community Facilities** – Local medical and dental facilities are already near to their capacity.

- **Air Quality and Pollution –** Concerned about increased noise and air pollution.

(0170 Balerno Community Council; 0321 Ratho & District Community; 2189 Currie Community Council; 47 individuals listed in Issue 12 Appendix D)

Representations opposed to HSG 35, HSG 36 & HSG 37 in current form and seeking its removal and/or change

- Concerned that the housing allocations would increase peak hour traffic at the Gillespie Road crossroads, where current conditions are already a significant concern. Development principles for both Curriehill Road and Newmills Road should include the need for full transport assessments taking into account existing conditions at Gillespie Crossroads. **(0305 Colinton Amenity Association)**
- Concerned that Lanark Road West will not be able to cope with this level of traffic. Table 9 should include a reference to transport improvements in the Juniper Green/Currie/Balerno area to ensure the existing road network and safety related issues are significantly improved before any additional housing is permitted. Asks that the Currie/Balerno bypass is re-instated in the Plan. Increased polution will have adverse impact on health. No new housing development to be allowed until the bypass is built. **(0480 Currie East Neighbourhood Watch; 1342 Iain Proudfoot)**

Modifications sought by those submitting representations:

Representations seeking removal of HSG 35 Riccarton Mains Road

- Remove proposal from the Plan. **(1565 Gordon Macdonald MSP; 2706 Juniper Green Community Council; 147 individuals listed in Issue 12 Appendix A)**

Representations opposed to HSG 35 Riccarton Mains Road in current form and seeking its removal and/or change

- Supports HSG 35 as a housing allocation, but seeks amendment of the site capacity from 25-35 to 20. **(2274 CALA Management)**

Representations seeking removal of HSG 36 Curriehill Road

- Remove proposal from the Plan. **(1565 Gordon Macdonald MSP; 2706 Juniper Green Community Council; 158 individuals listed in Issue 12 Appendix B)**

Representations opposed to HSG 36 Curriehill Road in current form and seeking its removal and/or change

- Support the allocation of HSG 36. However, requests removal of references to retail units in bullet 4 of the HSG 36 Curriehill Road site brief. **(0685 CALA Management Ltd)**
- Curriehill Road to be widened or altered at the railway bridge. **(1252 Michael Crowe)**
- Amend table 4 and development principles for HSG 36 Curriehill Road to include ‘the finalised site capacity design and layout should be informed by an adequate flood risk assessment’. **(2699 Scottish Environment Protection Agency)**

Representations seeking removal of HSG 37 Newmills Road

- Remove proposal from the plan. **(0170 Balerno Community Council; 1565 Gordon Macdonald MSP; 2126 Cockburn Association; 2280 Mr and Mrs Philip and Barratt David Wilson Homes; 2706 Juniper Green Community Council; 192 individuals listed in Issue 12 Appendix C)**

Representations opposed to HSG 37 Newmills Road in current form and seeking its removal and/or change

- Reduce numbers of houses being proposed. **(0108 E McNally)**
- Supports land allocated at HSG 37. However, objects to the proposed housing capacity of 170-245. Suggests reducing the housing capacity to 160 units. **(0685 CALA Management Ltd)**
- Delete the 3rd bullet in the Newmills Road development principles and insert 'access to the site from Lanark Road West via Newmills Road'. Add a new principle – 'new greenspace with trees within the site to meet the Council's greenspace standard.' Reduce the number of units allocated on HSG 37 Newmills Road and increase greenspace/woodland to alleviate coalescence'. **(2126 Cockburn Association)**

Representations seeking removal of HSG 35, HSG 36 & HSG 37

- Remove proposals from the Plan. **(0170 Balerno Community Council; 0321 Ratho & District Community; 0480 Currie East Neighbourhood Watch; 2189 Currie Community Council; 47 individuals listed in Issue 12 Appendix D)**

Representations supporting HSG 35, HSG 36 & HSG 37

- **00685 Cala Management Ltd**

Representations opposed to HSG 35, HSG 36 & HSG 37 in current form and seeking its removal and/or change

- Development principles for both Curriehill Road and Newmills Road should include the need for full transport assessments taking into account existing conditions at Gillespie Crossroads. **(0305 Colinton Amenity Association)**
- Table 9 should include a reference to transport improvements in the Juniper Green/Currie/Balerno area to ensure the existing road network and safety related issues are significantly improved before any additional housing is permitted. **(0480 Currie East Neighbourhood Watch; 1342 Iain Proudfoot)**

Summary of responses (including reasons) by planning authority:

Site selection - HSG 35 Riccarton Mains Road, HSG 36 Curriehill Road and HSG 37 Newmills Road

- The LDP must conform to the relevant provisions of the approved SDP and its Supplementary Guidance. These include a requirement for a generous allocation of housing land in the Council's area and the designation of a green belt around Edinburgh (SDP Policies 5, 7 and 12).

In preparing the LDP, the Council has sought to meet the overall housing land requirement in ways which prioritise use of brownfield sites in existing urban areas and which minimise the loss of land from the Green Belt, in accordance with SDP paragraphs 113 and 130. The Council's response to the representations in Issue 5 explains why it is nevertheless necessary for this LDP to make significant new releases of greenfield land from the green belt at this time, and of the scale set out in the Second Proposed Plan.

In selecting greenfield housing sites for release, the Council has sought to minimise the impact on greenbelt objectives and to secure long-term boundaries, in accordance with SDP Policy 12 and paragraph 130. To do so, the Council has assessed relevant greenfield land for its suitability in these terms. The site assessment process has gathered evidence on the relevant land on a systematic and consistent basis and presented its findings in a way which enables comparison and hence selection of those sites which are most appropriate. This approach has been informed by consideration of the findings and recommendations of the Report of Inquiry for the Edinburgh City Local Plan (pages 1-21 to 1-26).

For the LDP the Council has set out the evidence of its housing site assessment in the project's Environmental Report, which also presents the statutory Strategic Environmental Assessment of the Plan. The method and criteria used in the site selection process are described in Volume 1 of the Environmental Report – Second Revision, pages 26-33. The site assessments are set out in Appendices 5-9 (Volume 2) and, for some sites, the Environmental Report Addendum. At each stage of the LDP project the Environmental Report has been revised and updated as appropriate to:

- show what regard has been had to statutory representations received at the previous stage;
- respond to changes in the SDP context to the LDP, which have required additional housing land to be found.

At the LDP's Main Issues Report and first Proposed Plan stages, the provisions of the emerging SDP were such that the emerging LDP could meet its requirement for new housing land within the West and South East Edinburgh Strategic Development Areas. The LDP was also restricted by the Proposed SDP's version of Policy 7 from making large (defined as over 50 units) new greenfield housing releases outwith the Strategic Development Areas. The context of the approved SDP and its Supplementary Guidance now means that the Second Proposed Plan has had to find additional sites, but has been able to do so partly on large sites outwith the Strategic Development Areas. Environmental and infrastructure constraints within these two Strategic Development Areas as identified in the site selection process have meant that some land there is not suitable for allocation and should be retained in the green belt. This outcome was anticipated in the SDP Supplementary Guidance (paragraph 3.9), and is consistent with SDP Policy 1A, which allows LDPs to identify areas of restraint where justified.

The criteria used for the housing site assessment are set out in Tables 6 and 7 of the Environmental Report (Volume 1). They are structured using the three objectives for green belts stated in Scottish Planning Policy paragraph 49 and SDP Policy 12. They correspond to SDP policies and the content of Scottish Planning Policy as set out in Table 1, page 3 of the Environmental Report Addendum. The

assessment findings set out in the appendices of the Environmental Report include the Council's overall conclusions about whether some or all of a site should be allocated in the LDP.
For ease of comparison, the assessment findings are presented in matrix form in Appendix 2 Updated of the Environmental Report Addendum (an updated version of Appendix 2 of the Environmental Report – Second Revision (Volume 1)). This is intended to be a similar format to that used in the Edinburgh City Local Plan Report of Inquiry. The LDP assessment uses a 'traffic light' symbology to indicate whether a site meets a criterion (green), does not meet it (red), or partly meets it / uncertainty (amber).

For sites selected and allocated in the LDP, a separate, statutory assessment of their likely environmental effects is set out in Appendix 3 of Volume 1 of the Environmental Report. In some cases this identifies likely adverse impacts. Section 4 of the Environmental Report sets these out along with proposed mitigation.

This site selection process has resulted in the Second Proposed Plan's spatial strategy, summarised on Figure 1 of the Plan. It meets the housing land requirements in full while designating a green belt which best meets the objectives of Scottish Planning Policy and SDP Policy 12.

The Second Proposed Plan's spatial strategy establishes and maintains strong, clear long-term boundaries to control the outward growth of the city.

No modification proposed.

<u>Representations seeking removal of HSG 35 Riccarton Mains Road</u>

- **Site Selection –** See the Council's general response on site selection and principle of development on page 7.
- **Transport Infrastructure** – As part of the Plan process, the Council has carried out a Transport Appraisal. (Volumes 1 and 2, 2013, Addendum, 2014) This appraised the cumulative impact of the new developments proposed in the Plan, taking account of other factors. This identifies improvements to transport infrastructure to deal with the net impact of new housing proposals in South West Edinburgh. These transport actions are set out in the Council's Proposed Action Programme pages 44-45. For Riccarton Mains Road, the action is Transport Regulation Order and movement of 40mph speed limit zone on Riccarton Mains Road. The detail of this action is being established through transport assessments required at the planning application stage. All relevant proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.
- **School Infrastructure** – As part of the Plan process, the Council has prepared a Revised Education Appraisal June 2014 (corrected September 2014) which identifies the improvements to school infrastructure to deal with the net impact of new housing proposals in South West Edinburgh. The Education actions for South West Edinburgh are set out within the Council's Proposed Action Programme, pages 43-44. The action is a five class extension to Currie (non-denomination) Primary School. All proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.
- **Community Facilities** – The Plan in paragraph 72 acknowledges that housing proposals will have implications for the provision of primary healthcare and other

community health services. Policy Hou 10 Community Facilities seeks to ensure that where practical and reasonable a range of community facilities is provided with new housing development. The Plan identifies where non-residential units should be provided in new housing sites which could provide potential premises for new health practices. Paragraph 130 of the Plan states that developer contributions to measures intended to mitigate the net effects of development, other than actions identified in the Action Programme, may also be required. The Council has discussed all growth allocations with the relevant part of NHS Lothian. This has assessed the need for new and expanded general practitioner practices to accommodate the planned housing growth set out in the Second Proposed Plan. No specific actions have been included in the Action Programme at this time, however when suitable and specific actions are identified these will be included in future iterations of the Action Programme. Where these are needed to address demand arising from new development, financial contributions towards the cost may be sought in line with relevant policies and guidance.

- **Air Quality and Pollution –** The Environmental Report identifies this as one of the main environmental issues currently prevalent within the Council area (Volume 1, page 40). It finds that the Plan's general supportive development policies may lead to further negative cumulative and synergistic effects, particularly within key transport corridors. The current air quality issues are attributed mainly to traffic congestion and Air Quality Management Areas are in place with Council action plans setting out measures to help reduce vehicle emissions within these areas. The Council's Local Transport Strategy (2014-2019) identifies a range of actions and policies to reduce emissions and improve air quality standards across the city. With specific regard to new allocations in strategic development areas, the Environmental Report identifies the potential for a short-to-medium harmful impact. Mitigation measures include:
    - Locating development in accessible locations
    - A number of public transport improvements
    - Other measures identified in site briefs and development principles in the Plan

  The Council is aware that site HSG 35 is adjacent to land which has been the subject of former landfill operation. Records indicate that the site was operated by Munro Landscapes Ltd of 48 Bavelaw Road, Balerno and was open from 1983 to 1991. The general indication was that the fill was 'inert' material and therefore less likely to be capable of producing landfill gases. As the landfill was privately run, there is no Local Authority monitoring data of gas emissions/contamination available. However, a planning application for the site would be assessed against Policy Env 22 in Part 2 Section 3 of the Plan, which addresses ground conditions and pollution. It is likely that a condition would be attached to any consent which ensures that a site survey is carried out prior to the commencement of construction and where necessary, a detailed schedule of any remedial and/or protective measures submitted.

  No modification proposed.

(1565 Gordon Macdonald MSP; 2706 Juniper Green Community Council; 147 individuals listed in Issue 12 Appendix A)

Representations opposed to HSG 35 Riccarton Mains Road in current form and seeking its removal and/or change

- Site capacity has already been revised to take account of constraints of the existing overhead power lines identified by representation to March 2013 proposed plan. The proposed capacity is consistent with the density range applied across New Housing Proposals in Table 4 of the Plan and provides a suitable context in which to consider detailed layout proposals. No modification proposed. **(2274 CALA Management)**

Representations seeking removal of HSG 36 Curriehill Road

- **Site Selection -** See the Council's response on site selection and principle of development on page 7.
- **Transport Infrastructure** – As part of the Local Development Plan process, the Council has carried out a Transport Appraisal. (Volumes 1 and 2, 2013, Addendum, 2014) This appraised the cumulative impact of the new developments proposed in the Plan, taking account of other factors. This identifies improvements to transport infrastructure to deal with the net impact of new housing proposals in South West Edinburgh. These transport actions are set out in the Council's Proposed Action Programme pages 44-45. For Curriehill Road, the actions include providing a new footway along east boundary frontage (Curriehill Road) to link with existing footway network, improving the high quality pedestrian/cycle link to Curriehill Station, helping to provide additional cycle parking at Curriehill Station and upgrading existing bus stop facilities at Riccarton Avenue. The detail of this action is being established through transport assessments required at the planning application stage. All relevant proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.
- **School Infrastructure** – As part of the Plan process, the Council has prepared a Revised Education Appraisal June 2014 (corrected September 2014) which identifies the improvements to school infrastructure to deal with the net impact of new housing proposals in South West Edinburgh. The Education actions for South West Edinburgh are set out within the Council's Proposed Action Programme, pages 43-44. The action is a five class extension to Currie (non-denomination) Primary School. All proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.
- **Community Facilities** – The Plan in paragraph 72 acknowledges that housing proposals will have implications for the provision of primary healthcare and other community health services. Policy Hou 10 Community Facilities seeks to ensure that where practical and reasonable a range of community facilities is provided with new housing development. The Plan identifies where non-residential units should be provided in new housing sites which could provide potential premises for new health practices. Paragraph 130 of the Plan states that developer contributions to measures intended to mitigate the net effects of development, other than actions identified in the Action Programme, may also be required. The Council has discussed all growth allocations with the relevant part of NHS Lothian. This has assessed the need for new and expanded general practitioner practices to accommodate the planned housing growth set out in the Second Proposed Plan. No specific actions have been included in the Action Programme at this time, however when suitable and specific actions are identified these will be included in future iterations of the Action Programme. Where these are needed to address demand arising from new development, financial contributions towards the cost may be sought in line with relevant policies and guidance.
- **Biodiversity and Natural Habitat** – In preparing a Local Development Plan, the

Council must comply with the Scottish Biodiversity Duty. This has been done by carrying out a Strategic Environmental Assessment. One of the objectives of the Strategic Environmental Assessment is to 'Protect and enhance biodiversity, flora and fauna, and habitat networks'. The Strategic Environmental Assessment's findings are available in the Environmental Report. Volume 1 page 34 sets out the method of assessment, which uses the maps in Volume 2 (page 3). The relevant findings regarding Curriehill Road are set out in Volume 1 page 76.The allocations do not have a significant harmful effect on biodiversity, flora or fauna.

- **Air Quality and Pollution** – The Environmental Report identifies this as one of the main environmental issues currently prevalent within the Council area (Volume 1, page 40). It finds that the Plan's general supportive development policies may lead to further negative cumulative and synergistic effects, particularly within key transport corridors. The current air quality issues are attributed mainly to traffic congestion and Air Quality Management Areas are in place with Council action plans setting out measures to help reduce vehicle emissions within these areas. The Council's Local Transport Strategy (2014-2019) identifies a range of actions and policies to reduce emissions and improve air quality standards across the city. With specific regard to new allocations in strategic development areas, the Environmental Report identifies the potential for a short-to-medium harmful impact. Mitigation measures include:
    - Locating development in accessible locations
    - A number of public transport improvements
    - Other measures identified in site briefs and development principles in the Plan.
- **Recreational Amenity** – The Curriehill Road Development Principles on page 72 of the Plan set out specific requirements relating to public access. It states that 'direct pedestrian links to be formed between Curriehill Road and Curriehill Station through the site. Connections also to be made to the Kirknewton Core Path to the west boundary of the site.

  No modification proposed.

  <u>Update from Capital Coalition Motion 14 May 2015:</u>
  The Council sees merit in the representations objecting to housing Proposals HSG 31 Curriemuirend (see Issue 13) and HSG 36 Curriehill Road and HSG 37 Newmills Road, and notes that their removal from the Plan would account for 435 units of the capacity provided for by the allocation of East of Millburn Tower (see Issue 14).

  (1565 Gordon Macdonald MSP; 2706 Juniper Green Community Council; 158 individuals listed in Issue 12 Appendix B)

<u>Representations opposed to HSG 36 Curriehill Road in current form and seeking its removal and/or change</u>

- The issue of flood risk for all developments, not just LDP proposals is addressed through Policy Env 21. No modification proposed **(2699 Scottish Environment Protection Agency).**
- The site brief for Curriehill Road identifies opportunities for flatted development and commercial/retail units to the north of the site by the railway line. This is the most accessible part of the site and provides potential premises for new health practices. No modifications proposed **(0685 CALA Management Ltd).**

- As part of the Local Development Plan process, the Council has carried out a Transport Appraisal (Volumes 1 and 2, 2013, Addendum, 2014) This appraised the cumulative impact of the new developments proposed in the Plan, taking account of other factors. This identifies improvements to transport infrastructure to deal with the net impact of new housing proposals in South West Edinburgh. These transport actions are set out in the Council's Proposed Action Programme pages 44-45. For Curriehill Road, the actions include providing a new footway along east boundary frontage (Curriehill Road) to link with existing footway network, improving the high quality pedestrian/cycle link to Curriehill Station, helping to provide additional cycle parking at Curriehill Station and upgrading existing bus stop facilities at Riccarton Avenue. The detail of this action is being established through transport assessments required at the planning application stage. All relevant proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance. Widening or altering Curriehill Road at the railway bridge was not identified as specific actions. Furthermore, it would not be reasonable to attribute the cost of remedying any pre-existing issues with the standard of a road or bridge to a development site, particularly a small one for which the likely high cost of a new bridge would be out of proportion. No modification proposed. **(1252 Michael Crowe).**

Representations seeking removal of HSG 37 Newmills Road

- **Site Selection -** See the Council's response on site selection and principle of development on page 7.
- **Transport Infrastructure** – As part of the Local Development Plan process, the Council has carried out a Transport Appraisal. (Volumes 1 and 2, 2013, Addendum, 2014) This appraised the cumulative impact of the new developments proposed in the Plan, taking account of other factors. This identifies improvements to transport infrastructure to deal with the net impact of new housing proposals in South West Edinburgh. These transport actions are set out in the Council's Proposed Action Programme pages 44-45. For Newmills Road, the actions include a new footway along east frontage boundary, improved pedestrian/cycle crossing facilities on A70, in vicinity of Newmills Road junction, upgrading cycle routes between Newmills Road and Curriehill Station, and extending the car park at Curriehill Station. The detail of this action is being established through transport assessments required at the planning application stage. All relevant proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.
- **School Infrastructure** – As part of the Plan process, the Council has prepared a Revised Education Appraisal June 2014 (corrected September 2014) which identifies the improvements to school infrastructure to deal with the net impact of new housing proposals in South West Edinburgh. The Education actions for South West Edinburgh are set out within the Council's Proposed Action Programme, pages 43-44. The action is a 5 class extension to Currie (non-denomination) Primary School. All proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.
- **Community Facilities** – The Plan in paragraph 72 acknowledges that housing proposals will have implications for the provision of primary healthcare and other community health services. Policy Hou 10 Community Facilities seeks to ensure that where practical and reasonable a range of community facilities is provided with new housing development. The Plan identifies where non-residential units should be provided in new housing sites which could provide potential premises for

new health practices. Paragraph 130 of the Plan states that developer contributions to measures intended to mitigate the net effects of development, other than actions identified in the Action Programme, may also be required. The Council has discussed all growth allocations with the relevant part of NHS Lothian. This has assessed the need for new and expanded general practitioner practices to accommodate the planned housing growth set out in the Second Proposed Plan. No specific actions have been included in the Action Programme at this time, however when suitable and specific actions are identified these will be included in future iterations of the Action Programme. Where these are needed to address demand arising from new development, financial contributions towards the cost may be sought in line with relevant policies and guidance.

- **Biodiversity and Natural Habitat** – In preparing a Local Development Plan, the Council must comply with the Scottish Biodiversity Duty. This has been done by carrying out a Strategic Environmental Assessment. One of the objectives of the Strategic Environmental Assessment is to 'Protect and enhance biodiversity, flora and fauna, and habitat networks'. The Strategic Environmental Assessment's findings are available in the Environmental Report. Volume 1 page 34 sets out the method of assessment, which uses the maps in Volume 2 (page 3). The relevant findings regarding Newmills are set out in Volume 1 page 77. The allocations do not have a significant harmful effect on biodiversity, flora or fauna.
- **Air Quality and Pollution** – The Environmental Report identifies this as one of the main environmental issues currently prevalent within the Council area (Volume 1, page 40). It finds that the Plan's generally supportive development policies may lead to further negative cumulative and synergistic effects, particularly within key transport corridors. The current air quality issues are attributed mainly to traffic congestion and Air Quality Management Areas are in place with Council action plans setting out measures to help reduce vehicle emissions within these areas. The Council's Local Transport Strategy (2014-2019) identifies a range of actions and policies to reduce emissions and improve air quality standards across the city. With specific regard to new allocations in strategic development areas, the Environmental Report identifies the potential for a short-to-medium harmful impact. Mitigation measures include:
    - Locating development in accessible locations
    - A number of public transport improvements
    - Other measures identified in site briefs and development principles in the Plan.
- **Recreational Amenity** – The site brief for Newmills Road proposes a new linear park (GS 11) of approximately 50m width to be formed to the western edge of the site as part of an off road, multi user path between the Water of Leith Walkway and Kirknewton. A new park will address the large greenspace deficiency to the north of Balerno, enhance connectivity of native broadleaf woodland habitat and integrate SUDs measures. It could also provide new allotments. The park would be multifunctional in nature, contributing to the delivery of the Central Scotland Green Network as set out in Figure 5 Green Network in Part 1 of the Plan.

No modification proposed.

<u>Update from Capital Coalition Motion 14 May 2015:</u>
The Council sees merit in the representations objecting to housing Proposals HSG 31 Curriemuirend (see Issue 13) and HSG 36 Curriehill Road and HSG 37 Newmills Road, and notes that their removal from the Plan would account for 435 units of the capacity provided for by the allocation of East of Millburn Tower (see

Issue 14).

(0170 Balerno Community Council; 0685 CALA Management Ltd; 1565 Gordon Macdonald MSP; 2280 Mr and Mrs Philip and Barratt David Wilson Homes; 2706 Juniper Green Community Council; 193 individuals listed in Issue 12 Appendix C)

Representations opposed to HSG 37 Newmills Road in current form and seeking its removal and/or change

- The proposed site capacity is based on a density range of 25-35 units per hectare. The diagrams showing indicative areas available for new housing on page 237 of the Environmental Report – Second Revision, Volume 2 June 2014 take into account site topography, with housing identified on the flatter parts of the site and landtake for roads and proposed open space deducted from the total site area. Through use of a mix of house types as sought by Policy Hou 2, a higher density of development can be achieved alongside detached and semi-detached dwellings, without impact on character and amenity, thereby making most efficient use of greenfield land and providing for a socially diverse and inclusive community. No modifications proposed. **(0108 E McNally; 0685 CALA Management Ltd)**
- Prevention of coalescence is no longer a specific objective of green belt policy in Scottish Planning Policy. Whilst green belts can perform this role, coalescence can be promoted in order to create a more sustainable settlement pattern and the spatial form of the green belt can adopt different forms.

  The land in question provides a wedge of open landscape between two parts of Balerno, with the two settlements already having merged to the east of the site. It is considered that this structural role could continue to be provided by a new public park, greenspace proposal GS11, to address deficiencies in terms of access to a large greenspace as per the Council's Open Space Strategy and secure part of an off-road multi-user path connection between the Water of Leith walkway and Kirknewton. The Open Space Strategy requires a minimum of 2 ha open space to be provided with 800m of dwellings. An area of 3 ha has been proposed, linked to the existing residential areas to the east and west of the site and which should be multifunctional in nature. The park would be multifunctional in nature, contributing to the delivery of the Central Scotland Green Network as set out in Figure 5 Green Network in Part 1 of the Plan.

  Whilst connecting within existing woodland habitats will be important, the Council do not wish to prescribe a woodland treatment to the east edge of the park. Instead the site brief indicates a street frontage addressing the proposed new greenspace to provide natural surveillance. Consequently, it is considered that the proposed site capacity does not require to be revised.

  These matters have been considered in detail in the Environmental Report – Second Revision, Volume 2, June 2014, under the assessments titles 'Currievale' pages 180-186 and 'Newmills Road' pages 187-189.

  The A70 is already subject to street lighting and various road signs and it is not considered that development of the site would substantially alter roadside views. No modification proposed. **(2126 Cockburn Association)**

Representations seeking removal of HSG 35, HSG 36 & HSG 37

- The Council's response and reasoning regarding issues relating to transport infrastructure, school infrastructure, community facilities and air quality and pollution is set out for each site individually above. No modification proposed.

  Update from Capital Coalition Motion 14 May 2015:
  The Council sees merit in the representations objecting to housing Proposals HSG 31 Curriemuirend (see Issue 13) and HSG 36 Curriehill Road and HSG 37 Newmills Road, and notes that their removal from the Plan would account for 435 units of the capacity provided for by the allocation of East of Millburn Tower (see Issue 14).

(0170 Balerno Community Council; 0321 Ratho & District Community; 2189 Currie Community Council; 47 individuals listed in Issue 12 Appendix D)

Representations supporting HSG 35, HSG 36 & HSG 37

- See representations to individual sites, above. No modification proposed. **(2274 CALA Management)**

Representations opposed to HSG 35, HSG 36 & HSG 37 in current form and seeking its removal and/or change

- As part of the Local Development Plan process, the Council has carried out a Transport Appraisal (Volumes 1 and 2, 2013, Addendum, 2014) This appraised the cumulative impact of the new developments proposed in the Plan, taking account of other factors. This identifies improvements to transport infrastructure to deal with the net impact of new housing proposals in South West Edinburgh. These transport actions are set out in the Council's Proposed Action Programme pages 44-45. The detail of these actions is being established through transport assessments/statements required at the planning application stage. All relevant proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance. No modification. Proposed.
- **Pollution -** The Environmental Report identifies this as one of the main environmental issues currently prevalent within the Council area (Volume 1, page 40). It finds that the Plan's generally supportive development policies may lead to further negative cumulative and synergistic effects, particularly within key transport corridors. The current air quality issues are attributed mainly to traffic congestion and Air Quality Management Areas are in place with Council action plans setting out measures to help reduce vehicle emissions within these areas. The Council's Local Transport Strategy (2014-2019) identifies a range of actions and policies to reduce emissions and improve air quality standards across the city. With specific regard to new allocations in strategic development areas, the Environmental Report identifies the potential for a short-to-medium harmful impact. Mitigation measures include:
  - Locating development in accessible locations
  - A number of public transport improvements
  - Other measures identified in site briefs and development principles in the Plan.

No modifications proposed.
(0305 Colinton Amenity Association; 0480 Currie East Neighbourhood Watch; 1342 Iain Proudfoot)

Reporter's conclusions:

General

1. The housing land requirement is set out in SESplan the strategic plan for the area. It's associated supplementary guidance- Housing Land November 2014 breaks down the requirement for each of the council areas including the City of Edinburgh. There is a statutory requirement for this local plan to demonstrate consistency with SESplan. In this context the proposed plan must identify a corresponding supply of housing land which should be effective or capable of becoming effective to meet the SESplan target.

2. These matters are assessed in more detail through my conclusions on Issue 5. I recognise the importance of the city's significant brownfield resource in providing future housing and enabling regeneration of the waterfront and other areas. Representations call for brownfield land to be developed first instead of sites in the current greenbelt. However the strategic plan sets a challenging housing target and accepts that greenfield release will be required. Market and economic conditions indicate that brownfield sites are unlikely to contribute a significant amount to housing completions in the short term. My assessment through Issue 5 demonstrates the particular requirement for sites to contribute to the housing land supply in the early years of the plan period. Scottish Planning Policy references the need to provide for a range and choice of sites.

3. HSG 35,36 and 37 are sites identified outwith the Strategic Development Areas in order to meet the requirements for housing land as identified through SESplan. These sites included in the section "Elsewhere across the City" were identified through the second proposed plan as the council considered that the Strategic Development Areas could not alone meet the strategic requirements for the city as established through supplementary guidance- Housing Land November 2014.

4. The council's capital coalition motion supports representations which suggest that there are better alternative sites available including within the West Edinburgh Strategic Development Area - East of Milburn Tower. As explained in my conclusion on Issue 5 and 14 the extent of the programming shortfall in the early years of the plan period requires the inclusion of additional sites rather than the substitution of one site for another. However, any site included in the plan must address other relevant policy and environmental requirements and prove to be capable of development over the plan period.

5. These sites were selected through the council's assessment process. This established a range of criteria against which the suitability of sites for inclusion could be assessed and compared. The criteria used for the housing site assessment are set out in Tables 6 and 7 of the Environmental Report (Volume 1). The council has assessed these sites through its Environmental Report Second Revision Volume 2 June 2014. These sites were assessed by the council as part of a larger site, referenced in the developers submissions as Currievale (see also Issue 16). For sites selected and allocated in the plan, a separate, statutory assessment of their likely environmental effects is set out in Appendix 3 of Volume 1 of the Environmental Report.

6. In responding to the matters raised in representation on these sites I have drawn on these assessments along with the Habitat Regulation Appraisal the Second Proposed Action Programme May 2015 and the council's education and transport appraisals. I have also considered the supporting documents lodged with representations. Pages 72 and 73 of the proposed plan includes site briefs and development principles for HSG 36 Curriehill Road and HSG 37 Newmills.

Riccarton Mains Road (HSG 35)

7. This is a small site between Riccarton Mains Garden Centre and the rear of the gardens along Weaver Knowe Crescent. I note the extent of local concerns about this site. However, from my site visit it is evident that circumstances have overtaken my assessment of this site through this examination as construction has now commenced. I note that a smaller development of just 17 houses may have addressed some of the concerns regarding traffic impact and impacts on residential amenity. In any event the site is retained on the proposals map and as referenced in table four. The stated capacity of the site is indicative and only the approved capacity will be counted towards the land supply as programmed in the up to date audit. For these reasons I find no reason to delete or otherwise modify the reference to this site.

Green belt, landscape, amenity and open space

8. Whilst the objective of retaining long term robust boundaries for the green belt applies the proposed plan must respond to the strategic development requirements as established through SESplan. I consider that the principle of green belt release is supported through the development plan strategy.

9. HSG 36 Curriehill Road is a field of unmanaged grassland to the south of Curriehill Station and north of the established settlement boundary. I consider there is potential to integrate with the urban area and enhance connectivity between the Station and Curriehill Road. The site is already well contained in the landscape by the planting along its boundary and there is potential for this to be strengthened and enhanced. This containment distinguishes the site from the more open belt of land to the west which has a much stronger function in providing a setting for the settlement and a robust edge to the green belt. I consider the site can be developed without compromising the setting of the established urban area. A robust new green belt can be formed along the railway and by re-enforced landscaping along the core path to the west. For these reasons, I do not consider that green belt objectives would be compromised.

10. The removal of a section of hedging along Curriehill Road to enable access to the site would open up views across the site. However I agree with the council that this would afford the opportunity to include a street frontage providing continuity with street views to the north.

11. I see no reason why careful layout and design should not avoid any issues relating to unacceptable privacy or loss of amenity to neighbouring residents. These matters should be addressed through any detailed planning application assessed in the context of the council's policies on design (section 2 Policies Design Principles for New Development).

12. HSG 37 Newmills Road extends into the urban area on a flat plateau of agricultural land. Its north-west boundary culminates in an open ridge which marks the existing edge

of the village to the north-east. The location of the village on the ridge against the backcloth of the Pentlands is visible on approach from the north of the railway. However the site is not prominent in these views. As a green wedge within the village I consider it has a limited function as part of the green belt and that its development could be accommodated without compromise to the wider setting of the city or Currie and Balerno. The land does maintain some separation between settlements but this is only evident between Newmills Road and Dalmahoy Crescent. The existing narrow wedge of land evident from Lanark Road would not be altered. The break in slope along the north-western boundary would provide an opportunity to establish new woodland as a long term defensible boundary to the green belt. With the new boundary as shown on the development brief I find the site could be developed without compromise to green belt objectives.

13. I recognise that development of the site would have a locally significant landscape impact. It contributes to the character and amenity of this residential area providing an attractive rural setting. This rural setting is also enjoyed by those using the Kirknewton core path which runs along the eastern boundary of the site. However the site has established planting along its boundaries and there are few directly facing properties. Views across the site are glimpsed and broken by existing planting. I consider that with a strong landscape framework and sensitive layout and design development can be achieved without an unacceptable impact on the character and amenity of the area or on recreational access. Careful layout, design and landscaping on this contained site should also avoid any sense of urban sprawl.

14. I note the provision made for a new linear park on the western edge of the site and the opportunity this creates for landscape enhancement and recreational access. Representation questions the adequacy of this area in meeting the identified deficiency in recreational space. I accept that its narrowness defines it as a green corridor wedge rather than a park but I consider that it can have a useful role in providing access and amenity space.

Transport Impacts

15. The representations on all of these sites reference particular concerns about existing traffic and road safety issues which they consider will be exacerbated by the proposed development. There is no current commitment to a bypass for the area and in the absence of any realistic prospect of delivery I have not relied on this in my assessment of traffic impact below nor recommended that reference to this be included in the plan. I appreciate concerns about the narrowness of the local road network given current levels of traffic. Site specific access arrangements and the configuration of junctions in the interests of road safety are detailed matters to be addressed at the planning application stage. There is nothing at this stage to indicate these matters cannot be sufficiently addressed. However I have added a development principle to require the proposals to address any identified impacts on the safe operation of the local road network.

16. The council's Transport Appraisal June 2014 sets out a number of actions to address the transport impacts of these proposals. The council identifies a south-west contribution zone through it action programme. All sites in this area are expected to contribute to an increase in the junction capacity of Gillespie Crossroads based on increasing the efficiency of the traffic signals through installation of MOVA (Microprocessor Optimised Vehicle Actuation). Contributions are also required to an extension to the park and ride facility at Hermiston. There are also site specific

requirements:

Curriehill Road HSG36

- Provide new footway along east boundary frontage (Curriehill Road) to link with existing footway network.
- Improve high quality pedestrian/cycle link to Curriehill Station (may involve upgrading existing link).
- Help provide additional cycle parking at Curriehill Station.
- Upgrade existing bus stop facilities in Riccarton Avenue.

Newmills HSG 37

- New footway along east frontage boundary
- Improved pedestrian/cycle crossing facilities on A70, in vicinity of Newmills Road junction – may be requirement for signal control.
- Upgrade cycle routes between Newmills Road and Curriehill Station.
- Provide additional cycle parking at Curriehill Station
- Provide new bus stop facilities on A70, in vicinity of Newmills Road.
- Train - extended car park at Curriehill Station.

17. I understand the significant concerns about traffic impact given the extent of congestion on the Balerno-Currie-Juniper Green corridor into the city and from Riccarton Mains Road to Sighthill. In terms of access to higher order services and employment locations the relative distance from the city and a more constrained choice of bus routes I consider the south-west compares relatively unfavourably to more accessible locations elsewhere in the city particularly in the identified Strategic Development Areas. However all these sites have access to a main bus route and to the Currie rail halt. This should enable other transport choices rather than reliance on the private car. This reflects the emphasis of Scottish Planning Policy and the council's transport appraisal.

18. To address assessed transport impacts the council has identified a range of interventions as detailed above. Representations question the sufficiency of the proposed improvements and the extent of the works required. I can understand the concerns of local residents in this respect given the extent of housing proposed and current congestion levels. Drawing on the conclusions in Issue 19, I consider that whilst the relevant actions should be identified in broad terms within the plan there should be a clear requirement for further assessment taking into account all known development and cross boundary impacts so that the full extent of any necessary design improvements can be addressed. I consider that the required mitigation is fundamental to securing the acceptability of these proposals.

19. Whilst the action plan is a useful mechanism and can be updated annually the proposed plan, as subject to this examination, should clearly establish the principle development requirements for these sites (see also Issues 5 and 21). My recommendation to include General Development Principles for South West Edinburgh brings together the various items of infrastructure that are likely to be required to mitigate the identified cumulative transport impacts and includes details of the need for further assessment. Site specific mitigation is included in relation to each of the sites. Whilst further assessment and detailed Supplementary Guidance is to be prepared I am satisfied that the plan as modified would provide an appropriate framework to ensure that

transport issues for these sites are sufficiently addressed.

Education Impacts

20. The action programme identifies a South West Edinburgh Education Contribution Zone within which sites should contribute to a 5 class extension to Currie Primary School (SCH10). The new housing sites within South West Edinburgh are served by a single nondenominational secondary school; Currie High School. The council's Education Appraisal states that Currie High School is projected to have spare capacity to accommodate the pupils from these proposed new housing sites.
Appendix 1).

21. The council accepts that proposed housing will add to significant rising rolls and give rise to the need for additional school space It states that "Even with education infrastructure, costliest and most time-critical intervention, the Council is assuming much of the risk and responsibility for forward and gap funding. This approach reduces the need for developments to provide major contributions upfront." Through submissions to the hearing the council estimates a lead in period of at least 3 years will allow for the planned provision of the required school infrastructure. It states that recognised financial constraints can be addressed through the council's proposed approach to forward and gap funding

22. I have no technical or expert evidence to dispute the confidence of the council, as education authority, that identified education impacts can be appropriately addressed. Consequently, I find no basis to conclude that education issues cannot be addressed or that these matters justify deletion of either of these sites. However, this conclusion does not negate the emphasis that I consider should be placed on the appropriate and planned provision of this necessary infrastructure.

23. In this context, I consider the proposed plan lacks detail on how this constraint is to be addressed. I believe that that such detail is required in order to give confidence to the local community and others that schools capacity issues will be addressed and that the proposed plan is not promoting development in South West Edinburgh that will place an unacceptable strain on existing schools.

24. Given that the proposed mitigation applies in a South-West Edinburgh context and is also relevant to the other housing sites in this area I consider the various education actions should be brought together for this area in Part 1 Section 5 of the plan. However it is also important that these actions and the council's approach to timeous delivery are further clarified. This will require Supplementary Guidance to provide greater clarity about the mechanisms, timing and funding of delivery. I consider these matters are sufficiently addressed through my recommendations on Issue 21.

Community and other facilities

25. Paragraph 72 of the proposed plan recognises the implications of the proposed plan for the provision of primary healthcare and other community health services. Policy Hou 10 on Community Facilities is relevant in this respect and states that planning permission will only be granted where there are associated proposals to provide any necessary health and other community facilities. The sites are accessible to the urban area and existing facilities. The proposed new school may have a role in this respect.

26. I note that Paragraph 130 of the Plan states that developer contributions may apply to actions in addition to those identified in the Action Programme. Discussions are on-going between the council and NHS Lothian to assess the need for new and expanded general practitioner practices to accommodate the planned housing growth set out in the Second Proposed Plan. However, no specific actions have been included at this time and this matter is not referenced in the development principles.

27. Our conclusions on Issues 5 and 21 recognise the importance of the appropriate provision of community facilities such as health. Additional text is recommended for inclusion in Part 2 section 1 of the plan to explain the lack of current evidence on this matter and to clarify that the current policy on developer contributions is focussed on transport, education and green space requirements. A clear approach will be required if the objective of Policy Hou 10 is to be realised but this may fall outwith the direct remit of the planning system. There is currently insufficient information/justification to include reference to required developer contributions towards the wider provision of other community facilities including health on these sites.

Loss of Agricultural Land

28. Extension of urban areas will inevitably encroach on agricultural land. Scottish Planning Policy (paragraph 80) seeks to protect prime quality farm land but recognises that loss of this land may be justified as a component of the settlement strategy. These are relatively small parcels of land included through the development plan to meet housing needs as a component of the settlement strategy. As such I do not consider that this matter alone would justify removal of these sites.

Nature conservation impacts

29. Policy Env6 would apply the necessary protection to any species protected under European or UK law. I am not aware that these sites present a particularly unusual or diverse habitat and I have no information to suggest they are of particular biodiversity value. One of the objectives of the Strategic Environmental Assessment is to 'Protect and enhance biodiversity, flora and fauna, and habitat networks'. The Strategic Environmental Assessment's findings are available in the Environmental Report. Volume 1 page 34 sets out the method of assessment, which uses the maps in Volume 2 (page 3). The relevant findings are set out in Volume 1 where the conclusion is that these allocations would not have a significant harmful effect on biodiversity, flora or fauna. I find no evidence to the contrary.

Drainage and Flooding

30. I note the Scottish Environmental Protection Agencies response that the review of the surface water 1 in 200 year flood map shows that small areas of HSG 36 Curriehill Road may be at risk of flooding. I think this could be addressed, in accordance with the precautionary principle advised in Scottish Planning Policy, by including a new development principle to state that 'the finalised site capacity design and layout should be informed by an adequate flood risk assessment'.

31. Policy Env21 on flood protection states that planning permission will not be granted on sites that would increase the risk of flooding or be at risk from flooding or where sites are in areas of importance for flood management or where prejudicial to existing or planned flood defences.

32. Whilst policy Env21 provides for flood protection, Scottish Planning Policy through paragraphs 260-263 highlights the role of development plans in addressing flood risk including water-course flooding and surface water. There is no suggestion from the available evidence that these sites are at any identified risk from flooding, surface water of other drainage issues which cannot be addressed at the detailed planning stage.

Density

33. I note concerns about the density of the proposed developments. However, as stated elsewhere in this report the site capacities referenced in the plan are indicative at this stage subject to detailed consideration at the planning application stage. Achieving a high density should not be achieved at the cost of achieving an appropriate design and layout in keeping with the character and amenity of the local area.

Air Quality and Pollution

34. Housing on these sites and the associated transport movements will undoubtedly have impacts on air quality and pollution in an area already associated with traffic congestion. However, as stated above, I find no reason to conclude that the assessed traffic impacts would be unacceptable. Public transport accessibility will be key to minimising the pollution impacts of increased traffic. I understand that Air Quality Management Areas are in place with Council action plans setting out measures to help reduce vehicle emissions within these areas. The Council's Local Transport Strategy (2014-2019) identifies a range of actions and policies to reduce emissions and improve air quality standards across the city. For these reasons, whilst I agree that these impacts are potentially significant, I consider there is scope for appropriate mitigation. Subject to the stated mitigation, to be further defined in the development principles, I am not persuaded that these concerns justify deletion of these sites.

Overall Conclusion

35. My recommendations here and elsewhere in this report reflect the need to insure that the plan provides more clarity on the required infrastructure provision and other mitigation. This is addressed for the proposed sites in South-West Edinburgh through the recommended inclusion of General Development Principles along with an expanded policy on developer contributions to be supported through Supplementary Guidance. Other mitigation is addressed through the site specific development principles below and as already included in the plan. The action programme will then provide the means to monitor and manage progress towards timeous delivery of the required mitigation.

36. I understand that these proposals have caused significant local concern. However, there is a requirement for housing land that cannot be fully addressed on brownfield sites. My conclusion drawing on all of the above is that subject to the required mitigation these sites should be retained for housing.

Reporter's recommendations:

Modify the proposed plan as follows:

1. Add the following development principles to Curriehill Road (HSG36)

- Address the General Development Principles for South-West Edinburgh (as set out

in paragraphs 123-125)

- Address any identified impacts on the safe operation of the local road network
- Provide a new footway along the east boundary frontage (Curriehill Road) to link with existing footway network.
- Improve high quality pedestrian/cycle link to Curriehill Station (may involve upgrading existing link).
- Help provide additional cycle parking at Curriehill Station.
- Upgrade existing bus stop facilities in Riccarton Avenue.
- The finalised site capacity design and layout should be informed by an adequate flood risk assessment.

2. Add the following development principles to Newmills (HSG 37)

- Address the General Development Principles for South-West Edinburgh (as set out in paragraphs 123-125).
- Provide a new footway along the east frontage boundary
- Address any identified impacts on the safe operation of the local road network
- Improve pedestrian/cycle crossing facilities on A70, in vicinity of Newmills Road junction – may be requirement for signal control.
- Upgrade cycle routes between Newmills Road and Curriehill Station.
- Provide additional cycle parking at Curriehill Station
- Provide a new bus stop facilities on A70, in vicinity of Newmills Road.
- Possible contribution to extended car park at Curriehill Station.

Issue 12 Appendix A – HSG 35 Riccarton Mains Road

0007	Archie Smith
0091	Margaret Gourlay
0098	James Simpson
0100	Robin Davey
0101	Evelyn Davey
0102	D Stewart
0103	C Stewart
0105	J Gatenby
0106	William Burns
0137	Desmond Brady
0148	Sheila Reid
0166	Beryl Moncrieff
0167	Douglas Allan
0169	Anne Murray
0174	Lorna Thompson
0178	Phillip Thompson
0198	Elaine Wilkinson
0203	Scott Watson
0204	Gordon Laing
0205	W Watson
0206	Christine Laing
0207	Peter Mack
0208	Fiona Mack
0209	A. Cameron Grant
0210	Kerstin Grant
0214	Gillian Mackenzie
0215	Stephen Mackenzie
0216	Kenneth Ashurst
0217	Evelyn Ashurst
0218	Colin Ashurst
0219	Margaret Forsyth
0220	Robert Charles Forsyth
0221	Jill Thomson
0222	Andrew Thomson
0249	D.C Foggo
0250	M.A Foggo
0255	Jennifer Mallon
0257	Alex Mallon
0258	Jean Barton
0262	Douglas Reid
0264	Eleanor Wilkinson
0279	Maurice Green
0282	E Manson
0289	Stewart Mackinnon
0296	Joyce Sneddon
0307	Catherine Dowds
0316	Gladys Morton
0320	Alexander Valentine
0327	Douglas Marr
0563	Kenneth Dickson
0566	Helen Lumsden
0572	Nicola Watson
0575	Robert Renton
0733	Mark Galloway
0980	Robert Turnbull
0985	Isabella Howes
1021	E.J Harkness
1024	Barbara McMaster
1025	R.A Harkness
1030	Ann Stephen
1034	Kenneth Stephen
1039	James Cunningham
1041	B Clark
1061	George Chalmers
1062	Susan Chalmers
1076	George Marple
1085	Emma Marple
1087	Carole Marple
1091	Richard Cameron
1094	Mette Friis
1101	Alison Lyon
1102	George Gill
1107	Patricia Gill
1113	George S Ballantyne
1116	Sandra Cunningham
1126	Colin Arthur
1150	Bill Henderson
1152	Lorna Henderson
1153	Janet Johnston
1156	Alan Johnston
1157	John Henderson
1158	Alison Henderson
1348	Harry Simpson
1492	Richard Mitchell Henderson
1661	James Westwood
1929	K Burnside
2005	Keith Bain
2067	William Hamilton
2109	Margaret Deans
2129	Stewart Dredge
2139	Russell Salton
2183	Ewing Grainger
2191	George A Fraser
2202	Alan Johnston
2219	Arlene Ward
2220	Chris Ward
2224	Janet Mary Cowlishaw
2240	Teresa Martin

0336	Tim Lear
0351	Connie Trail
0352	Derek Trail
0356	Margaret Tracey-Bower
0365	Angela Loftus
0370	Malcolm Stewart
0383	Robert Hodge
0391	Holman
0392	George Taylor
0393	Alisdair Taylor
0395	Sue Hamilton
0399	Mary McLeod Hodge
0461	Jennie Hulse
0466	James Douglas
0469	Peter Wilson
0497	Douglas Hamilton
0516	Jon Wilson
0524	Kathleen Dishington
0527	Caroline Milne
0530	J Macdonald
0545	Kenneth Rankin
0546	Paul Hulse
0547	Pauline Rankin
0560	John Lumsden
0562	Shauna Dickson
2253	Michael Martin
2261	Peter Dawson
2296	Eddie Gownas
2298	Linda Gowans
2374	Rosalind Salton
2412	Peter Cowlishaw
2466	Kristina Vysotskaja
2469	Andrew Naylor
2483	Douglas N Lowe
2490	Alex Heron
2503	Beth Rankin
2530	Enid L Lowe
2571	Scott Lobban
2575	Greig Buckner
2577	Nicola Boyle
2578	Keri Lobban
2579	William Lobban
2587	Elizabeth Lobban
2588	Jacqueline Lobban
2591	Stephanie Russell
2601	Janet Russell
2626	Jack Millar
2667	Fraser Mackay
2668	Louise Mackay

Issue 12 Appendix B – HSG 36 Curriehill Road

0085	Ann Visser
0091	Margaret Gourlay
0098	James Simpson
0100	Robin Davey
0101	Evelyn Davey
0102	D Stewart
0103	C Stewart
0105	J Gatenby
0106	William Burns
0107	Robert Phillips
0112	Pearl Clark
0135	Andrew Clark
0137	Desmond Brady
0148	Sheila Reid
0166	Beryl Moncrieff
0167	Douglas Allan
0169	Anne Murray
0174	Lorna Thompson
0178	Phillip Thompson
0180	Graham Curran
0198	Elaine Wilkinson
0203	Scott Watson
0204	Gordon Laing
0205	W Watson
0206	Christine Laing
0207	Peter Mack
0208	Fiona Mack
0209	A. Cameron Grant
0210	Kerstin Grant
0214	Gillian Mackenzie
0215	Stephen Mackenzie
0216	Kenneth Ashurst
0217	Evelyn Ashurst
0218	Colin Ashurst
0219	Margaret Forsyth
0220	Robert Charles Forsyth
0221	Jill Thomson
0222	Andrew Thomson
0249	D.C Foggo
0250	M.A Foggo
0255	Jennifer Mallon
0257	Alex Mallon
0258	Jean Barton
0262	Douglas Reid
0264	Eleanor Wilkinson
0279	Maurice Green
0282	E Manson
0289	Stewart Mackinnon
0296	Joyce Sneddon
0562	Shauna Dickson
0563	Kenneth Dickson
0566	Helen Lumsden
0575	Robert Renton
0733	Mark Galloway
0764	Ian McGlade
0937	Harry Simpson
0980	Robert Turnbull
0985	Isabella Howes
1021	E.J Harkness
1024	Barbara McMaster
1025	R.A Harkness
1030	Ann Stephen
1034	Kenneth Stephen
1039	James Cunningham
1041	B Clark
1061	George Chalmers
1062	Susan Chalmers
1076	George Marple
1085	Emma Marple
1087	Carole Marple
1091	Richard Cameron
1094	Mette Friis
1101	Alison Lyon
1102	George Gill
1107	Patricia Gill
1113	George S Ballantyne
1116	Sandra Cunningham
1122	Christine Thompson
1123	Stephen J Thompson
1126	Colin Arthur
1136	Steven Aldridge
1150	Bill Henderson
1152	Lorna Henderson
1153	Janet Johnston
1156	Alan Johnston
1157	John Henderson
1158	Alison Henderson
1333	Alasdair Sligo
1492	Richard Mitchell Henderson
1661	James Westwood
1929	K Burnside
2005	Keith Bain
2067	William Hamilton
2109	Margaret Deans
2129	Stewart Dredge
2139	Russell Salton
2183	Ewing Grainger
2191	George A Fraser

0303	James Loftus
0316	Gladys Morton
0320	Alexander Valentine
0327	Douglas Marr
0336	Tim Lear
0351	Connie Trail
0352	Derek Trail
0356	Margaret Tracey-Bower
0365	Angela Loftus
0370	Malcolm Stewart
0371	Douglas Kinghorn
0383	Robert Hodge
0391	Holman
0392	George Taylor
0393	Alisdair Taylor
0395	Sue Hamilton
0399	Mary McLeod Hodge
0431	Jeni Sligo
0461	Jennie Hulse
0466	James Douglas
0469	Peter Wilson
0497	Douglas Hamilton
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0518	Alan Wilkie
0523	William Dent
0524	Kathleen Dishington
0527	Caroline Milne
0530	J Macdonald
0532	Alan Coupe
0546	Paul Hulse
0560	John Lumsden
2202	Alan Johnston
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2220	Chris Ward
2224	Janet Mary Cowlishaw
2240	Teresa Martin
2253	Michael Martin
2261	Peter Dawson
2296	Eddie Gownas
2298	Linda Gowans
2318	Arthur Howes
2373	C Jones
2374	Rosalind Salton
2412	Peter Cowlishaw
2466	Kristina Vysotskaja
2469	Andrew Naylor
2483	Douglas N Lowe
2530	Enid L Lowe
2571	Scott Lobban
2574	Jacqueline Lobban
2575	Greig Buckner
2577	Nicola Boyle
2578	Keri Lobban
2579	William Lobban
2587	Elizabeth Lobban
2591	Stephanie Russell
2601	Janet Russell
2626	Jack Millar
2667	Fraser Mackay
2668	Louise Mackay

Issue 12 Appendix C – HSG 37 Newmills Road

0091	Margaret Gourlay
0098	James Simpson
0100	Robin Davey
0101	Evelyn Davey
0102	D Stewart
0103	C Stewart
0106	William Burns
0107	Robert Phillips
0112	Pearl Clark
0122	Ian Alexander
0125	David Hay
0135	Andrew Clark
0137	Desmond Brady
0140	George McDonald
0141	Barbara McDonald
0143	Peter Ewen
0148	Sheila Reid
0166	Beryl Moncrieff
0167	Douglas Allan
0169	Anne Murray
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0180	Graham Curran
0196	Fiona Smith
0198	Elaine Wilkinson
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0205	W Watson
0206	Christine Laing
0207	Peter Mack
0208	Fiona Mack
0209	A. Cameron Grant
0210	Kerstin Grant
0214	Gillian Mackenzie
0215	Stephen Mackenzie
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0217	Evelyn Ashurst
0218	Colin Ashurst
0219	Margaret Forsyth
0220	Robert Charles Forsyth
0221	Jill Thomson
0222	Andrew Thomson
0229	David W Coull
0249	D.C Foggo
0250	M.A Foggo
0255	Jennifer Mallon
0257	Alex Mallon
0258	Jean Barton
0262	Douglas Reid
0263	David Wilkinson
0563	Kenneth Dickson
0566	Helen Lumsden
0575	Robert Renton
0594	Heather Gordon
0607	Hugh Parker
0670	Carol Hughes
0674	Alexandra F Henderson
0676	Leslie Hughes
0679	Brian C Henderson
0733	Mark Galloway
0764	Ian McGlade
0774	Susan Smith
0786	Pamela Thomas
0852	David Steel
0985	Isabella Howes
1021	E.J Harkness
1024	Barbara McMaster
1025	R.A Harkness
1030	Ann Stephen
1034	Kenneth Stephen
1039	James Cunningham
1041	B Clark
1061	George Chalmers
1062	Susan Chalmers
1076	George Marple
1085	Emma Marple
1087	Carole Marple
1091	Richard Cameron
1094	Mette Friis
1101	Alison Lyon
1102	George Gill
1107	Patricia Gill
1113	George S Ballantyne
1116	Sandra Cunningham
1122	Christine Thompson
1123	Stephen J Thompson
1126	Colin Arthur
1136	Steven Aldridge
1150	Bill Henderson
1152	Lorna Henderson
1153	Janet Johnston
1156	Alan Johnston
1157	John Henderson
1158	Alison Henderson
1333	Alasdair Sligo
1348	Harry Simpson
1492	Richard Mitchell Henderson
1661	James Westwood
1774	Ruth Smith

0264	Eleanor Wilkinson
0278	Richard Owen
0279	Maurice Green
0282	E Manson
0284	Paul Begg
0285	Josephine Bisacre
0289	Stewart Mackinnon
0298	Sunita Crawford
0303	James Loftus
0306	David Young
0307	Catherine Dowds
0310	Jim West
0316	Gladys Morton
0320	Alexander Valentine
0327	Douglas Marr
0336	Tim Lear
0343	David Kennedy
0346	Adam Fila
0351	Connie Trail
0352	Derek Trail
0356	Margaret Tracey-Bower
0365	Angela Loftus
0370	Malcolm Stewart
0376	Neal Fleming
0383	Robert Hodge
0391	Holman
0392	George Taylor
0393	Alisdair Taylor
0395	Sue Hamilton
0399	Mary McLeod Hodge
0403	Rory Henderson
0426	Graeme Davidson
0431	Jeni Sligo
0460	Christopher Linn
0461	Jennie Hulse
0466	James Douglas
0469	Peter Wilson
0497	Douglas Hamilton
0516	Jon Wilson
0518	Alan Wilkie
0524	Kathleen Dishington
0525	Gillian Coupe
0527	Caroline Milne
0530	J Macdonald
0532	Alan Coupe
0546	Paul Hulse
0560	John Lumsden
0562	Shauna Dickson
1929	K Burnside
2066	C A Burnside
2067	William Hamilton
2072	Sarah Dawson
2109	Margaret Deans
2120	Helen Sturrock
2129	Stewart Dredge
2139	Russell Salton
2156	David McGregor
2177	Pauline McKenzie
2183	Ewing Grainger
2202	Alan Johnston
2219	Arlene Ward
2220	Chris Ward
2224	Janet Mary Cowlishaw
2228	Sonya Dunbar
2239	Roy Sturrock
2240	Teresa Martin
2253	Michael Martin
2261	Peter Dawson
2293	Elaine Hutchison
2296	Eddie Gownas
2298	Linda Gowans
2318	Arthur Howes
2373	C Jones
2374	Rosalind Salton
2397	Genevieve MacKinlay
2412	Peter Cowlishaw
2466	Kristina Vysotskaja
2469	Andrew Naylor
2483	Douglas N Lowe
2530	Enid L Lowe
2571	Scott Lobban
2578	Keri Lobban
2579	William Lobban
2587	Elizabeth Lobban
2588	Jacqueline Lobban
2589	Andrew Hamlett
2591	Stephanie Russell
2599	Andrew Hoggarth
2601	Janet Russell
2608	Joanne Hoggarth
2615	Marian Burnett
2626	Jack Millar
2630	Robert Thomson
2667	Fraser Mackay
2668	Louise Mackay

Issue 12 Appendix D – HSG 35, HSG 36, HSG 37

0084	Colin Morton
0110	Iain MacLeod
0117	Hugh Ross
0119	Anne Ross
0127	John Wilkinson
0130	Cara Wilkinson
0134	William Kelly
0151	James McQue
0162	Elizabeth Cull
0163	Roger Cull
0164	James Brown
0181	Lynda Angela Cowie
0187	Julie Bianco
0188	Dario Bianco
0269	Ian Macphail
0312	Linda Philp
0314	Peter Philp
0338	Michael Caird
0405	Joan Proudfoot
0408	Marion Fleming
0420	Louise Wilson
0429	Margaret Fenelon
0496	Gordon Kinghorn
0680	Brian Keyse
0728	Linda MacLeod
0989	Mairi Fenelon
0993	Kevin Fenelon
1043	Michael Fenelon
1170	A J C Clark
1346	Iain McKay
1350	Alan Campbell
1490	Matthew Philp
1797	Graeme Kerr
1999	Linda Campbell
2025	Katharine Philp
2034	Sheila Steven
2142	James Montgomery
2143	Lesley Montgomery
2171	Laura Cargill
2329	Helen Ogg
2359	Alan Williamson
2360	Douglas Forsyth
2442	P Cooper
2455	W Cooper
2575	Greig Buckner
2577	Nicola Boyle
2643	Caroline Ritchie

Issue 13	**New Urban Area Housing Proposals**	
Development plan reference:	**HSG 28 Ellen's Glen Road** **HSG 30 Moredunvale** **HSG 31 Curriemuirend** **GS10 Curriemuirend**	**Reporter:** Richard Bowden

Body or person(s) submitting a representation raising the issue (including reference number):

31 individuals seeking removal of HSG 28 Ellen's Glen Road (see Issue 13 Appendix A)

109 individuals seeking removal of HSG 30 Moredunvale (see Issue 13 Appendix B)

719 individuals seeking removal of HSG 31 Curriemuirend (see Issue 13 Appendix C)

58 individuals seeking removal of HSG 31 and GS10 (see Issue 13 Appendix D)

Organisations, elected representatives and individuals other than those in Appendices A, B and C

0020 Allan Millar
0046 Dorothy Curr
0124 sportscotland
0145 Douglas Webb
0155 Catherine Webb
0161 Mary Sandilands
0170 Balerno Community Council
0184 Curriemuirend Park Allotment Association
0305 Colinton Amenity Association
0321 Ratho & District Community Council
0370 Malcolm Stewart
0391 Mr & Mrs Holman
0418 John Smith
0448 Roy McCluskey
0475 Tim Kingwell
0480 Currie East Neighbourhood Watch
0494 Eleanor Burns
0833 Roseann Ferguson
1064 Malbet and Yewlands Residents Association
1127 G Watson
1213 Friends of Currimuirend Park
1221 Moredun 4 Multis Residents Association
1213 Friends of Currimuirend Park 1226 Goodtrees Neighbourhood Centre
1554 Wester Hailes Community Council
1638 Juniper Green/Baberton Mains Community Council
1755 Cairn Housing Association
1849 Roy Brown
2006 Liberton & District Community Council
2126 Cockburn Association
2133 R MacKay
2189 Currie Community Council
2195 W Blair
2199 S Blair
2233 E Beevers
2237 Cliff Beevers
2256 Edinburgh and Lothian's Health Foundation
2494 Lisa Browning
2502 Neil Thomson
2662 Ian Murray MP
2697 Scottish Natural Heritage
2699 Scottish Environment Protection Agency
2706 Juniper Green Community Council
2716 NHS National Services Scotland

Provision of the development plan to which the issue relates:	These provisions of the Plan deal with the proposals for new urban housing allocations (HSG 28 Ellen's Glen Road, HSG 30 Moredunvale, HSG 31 Curriemuiend Park) and greenspace proposal GS10 Curriemuirend.

Planning authority's summary of the representation(s):

CONTEXT

The Main Issues Report in Question 7 sought views on four proposals for housing on areas of Council-owned green space to be accompanied by reduced but better quality green space. The first Proposed Plan included proposals on two of these sites – at Moredunvale Road and Curriemuirend, with indicative capacities.

The Second Proposed Plan retains these two proposals, with updated capacity estimates. It also allocates a new site, at Ellen's Glen Road, which involves loss of open space.

Representations seeking removal of HSG 28 Ellens Glen Road

Seek removal of HSG 28 on the grounds of one or more of the reasons listed below:

- **Principle –** representations object on the grounds of loss of green space, agricultural land and biodiversity at Stenhouse Market Gardens. Object on the grounds of pressure on existing open space which residents of Malbet Park maintain. Object on the grounds of impact on the 'Mount Alvernia' (85 Lasswade Road and 1-8 (Inclusive Nos.) former Convent of the Poor Clares Collettines boundary wall and trees.
- **Transport infrastructure** – representations object on the grounds of traffic congestion, access arrangements, including the proposed access off Malbet Wynd. Object on the grounds that access through Liberton hospital is speculative; access should be provided off Lasswade Road and access off Malbet Park is already a bottleneck.
- **School infrastructure** – representations object on the grounds of the impact on schools capacity, and identify the need for a new school.
- **Community Facilities** - representations object on the grounds of the impact on GP surgeries and policing.
- **Flooding, sewage, subsidence and residential amenity –** representations object on the grounds of that the development will make these problems more frequent. Object on the grounds of amenity daylight and privacy, overlooking and loss of view, environmental health issues, pollution and street lighting.
- **Cottage Flats** – object on the grounds that this is not defined in the glossary.

(1064 Malbet and Yewlands Residents Association; 2006 Liberton & District Community Council; 2126 Cockburn Association; 2662 Ian Murray MP; and individuals listed in Appendix A)

Representations opposed to HSG 28 Ellen's Glen Road in current form and seeking its removal and/or change:

- Proposes re-examination is necessary in relation to the potential density of the site and parking and traffic movements generated from the development **(0494 Eleanor Burns)**
- Objects on the grounds that the scale of development is not in-keeping with the existing housing density **(1127 G Watson)**
- The mix of housing to be provided should be dictated by the market at the time of the planning application. Table 4 should show an indicative maximum capacity for HSG 28 Ellen's Glen Road to allow the market to dictate density **(2716 NHS**

National Services Scotland)

- Objects on the grounds of pollution, impact on wildlife, impact on biodiversity and traffic congestion. Concerned over potential damage to trees and 'Mount Alvernia' (85 Lasswade Road and 1-8 (Inclusive Nos.) -former Convent of the Poor Clares Collettines boundary wall. **(2494 Lisa Browning; 2502 Neil Thomson)**

Support the allocation of HSG 28 Ellen's Glen Road

- Welcomes the allocation of proposal HSG 28 Ellen's Glen Road and has no objection to the development principles. The open space portion of the site at Stenhouse Market Gardens is effective **(2256 Edinburgh and Lothian's Health Foundation)**
- Supports the allocation of HSG 28 Ellen's Glen Road (**0448 Roy McCluskey)**

Representations seeking removal of HSG 30 Moredunvale

Seek removal of HSG 30 on the grounds of one or more of the reasons listed below:

- **Site selection –**loss of open space / green space and the resulting pressure on the existing open space and impact on health.
- **Transport infrastructure** – additional housing will mean that the surrounding roads will not be able to cope.
- **School infrastructure** –impact on schools capacity and request a new school.
- **Community Facilities** - GP surgeries and dentists.
- **Flooding, sewerage, subsidence and impact on residential amenity** including the impact on neighbours, daylight, overshadowing, and loss of privacy including a loss of view.

(1221 Moredun 4 Multis Residents Association; 1226 Goodtrees Neighbourhood Centre and individuals appendix B)

Representations opposed to HSG 30 in current form and seeking its removal and/or change

- Objects on the grounds of the previous loss of a car park at Goodtree Terrace **(0020 Allan Millar)**
- From the aerial imagery it appears that the site includes a grass football pitch with goals, while it is not clear what size this pitch is it may be appropriate to include reference to the need to reprovide a sports pitch. **(0124 sportscotland)**
- Objects on the grounds of above, suggests housing could be built at the Edinburgh BioQuarter instead. **(0475 Tim Kingwell)**
- Objects on the grounds of lack of information on whether the proposal impacts on open space provision. **(2126 Cockburn Association)**
- Welcome the provision for HSG 30 Moredunvale include "opportunity to create links to the wider green network", but more links should be created to the south **(2697 Scottish Natural Heritage)**
- This proposed site is located within functional flood plain or an area of known flood risk. As such, a flood risk assessment will be required to assess the risk from the Niddrie Burn. The northern perimeter of the site lies within the Areas of Importance for Flood Control and Fluvial Flood Risk Area **(2699 Scottish Environment Protection Agency)**

Representations seeking removal of HSG 31 Curriemuirend

Seek removal of HSG 31 on the grounds of one or more of the reasons listed below:

- **Principle -** representations object on the grouds of greenfield development, loss of agricultural land, that the proposal is contrary to SDP's Spatial Strategy, and coalescence between communities.
- **Open space and biodiversity** - representations object to the loss of open space, millennium woodland and amenity space. Representations are concerned about why is there a need to upgrade the football pitch; open space improvements at Clovenstone can not be considered credible and do not justify the loss of millennium woodland. Representations support the provision of an off road cycle track.
- **Feasibility study -** representations query the viability of the development based on a feasibility study carried out by the Council in regards to the site.
- **Transport Infrastructure –** representations object to the impact of the development on traffic congestion at Gillespie Crossroads and Lanark Road as well as response times of emergency services. References appeal decision for site in Balerno which referred to Gillespie Crossroads (reference PPA – 230 – 2112). Representations object to the Development Principles with regards to the opportunity in the to reduce Wester Hailes Road to one carriageway. Concerned over road safety along Wester Hailes Road if the development creates an active frontage; the speed limit should be reduced from 40 to 20mph to compensate.
- **School infrastructure –** representations object on the basis that local schools do not have sufficient capacity for extra children.
- **Community facilities –** representations object in regards to the impact on GP surgeries

(0170 Balerno Community Council; 0184 Curriemuirend Park Allotment Association; 0305 Colinton Amenity Association; 0321 Ratho & District Community Council; 1150 Bill Henderson; 1213 Friends of Currimuirend Park; 1554 Wester Hailes Community Council; 1638 Juniper Green / Baberton Mains Community Council; 1755 Cairn Housing Association; 2126 Cockburn Association; 2189 Currie Community Council; and individuals in Appendix C)

Representations opposed to HSG 31 Curriemuirend in current form and seeking its removal and/or change

- Transport Infrastructure, open space and biodiversity as above, and objects to proposal and suggests developing other sites such as East of Millburn Tower **(0046 Dorothy Curr; 2133 R MacKay; 2195 W Blair; 2199 S Blair)** Edinburgh Park **(0145 Douglas Webb; 0155 Catherine Webb; 0161 Mary Sandilands) or** The Gyle **(0391 Holman)**
- The cumulative impact of 800 houses with the Juniper Green / Currie / Balerno area, inclusing HSG 31 Curriemuirend Park would need additional traffic infrastructure on Calder Road. The Currie/Balerno bypass safeguard (T7) in the Rural West Edinburgh Local Plan should be re-instated. **(0480 Currie East Neighbourhood Watch)**
- Objects on the grounds of site layout and use of a cul-de-sac, access from one entry point, environmental impact, loss of open space and impact on biodiversity. Concerned over football pitch provisions **(1849 Roy Brown)**

- Notes incorrect referencing of GS10 and HSG29, incorrect assessment of Curriemuirend as a play park, not a wildlife park and considers it should be graded as high quality on that basis **(1213 Friends of Currimuirend Park).**
- Provides comments on HSG 31 site brief in relation to pedestrian and cycle links. Reference to representation on terms used in paragraphs 46 and 280 of Scottish Planning Policy. **(2697 Scottish Natural Heritage)**

Representations opposed to GS10 Curriemuirend in current form and seeking its removal and/or change

- Objects on the grounds of loss of woodland and impact on biodiversity. Concerned that local residents will not benefit from new play area and details of upgrading of football pitch have not been detailed **(0370 Malcolm Stewart)**
- Objects on the grounds of loss of natural play space and enhancement of facilities is not guaranteed **(418 John Smith)**
- Objects on the grounds of environmental impact, in particular the loss of trees **(0833 Roseann Ferguson)**
- Objects on the grounds of whether the existing facilities will be enhanced and there are no clear details of proposed changes **(2233 E Beevers)**
- Objects on the grounds of there are no guarantees that the facilities will be enhanced and adequate detailed information is not available **(2237 Cliff Beevers)**

Representations seeking removal of HSG 31 Curriemurend Park and GS10 Curriemuirend

Seek removal of HSG 31 and GS 10 on the grounds of one or more of the reasons listed below:

- **Education –** representations are concerned about the capacity at local schools.
- **Open space and biodiversity** Representations object to the loss of open space, millennium woodland and amenity space. Representations are concerned about why is there a need to upgrade the football pitch; open space improvements at Clovenstone can not be considered credible and do not justify the loss of millennium woodland. Representations support the provision of an off road cycle track.
- **Transport Infrastructure –** representations object to the impact of the development on traffic congestion at Gillespie Crossroads and Lanark Road as well as response times of emergency services. References appeal decision for site in Balerno which referred to Gillespie Crossroads (reference PPA – 230 – 2112). Representations object to the Development Principles with regards to the opportunity in the to reduce Wester Hailes Road to one carriageway. Concerned over road safety along Wester Hailes Road if the development creates an active frontage; the speed limit should be reduced from 40 to 20mph to compensate.

(1638 Juniper Green/Baberton Mains Community Council, 2706 Juniper Green Community Council and individuals in Appendix D)

Modifications sought by those submitting representations:

Representations seeking removal of HSG29 Ellen's Glen Road

- Remove proposal from the Plan, **(1064 Malbet and Yewlands Residents**

Association; 2006 Liberton & District Community Council; 2126 Cockburn Association; **2662 Ian Murray and individuals in appendix A)**

Representations opposed to HSG29 Ellen's Glen Road in current form and seeking its removal and/or change

- Re-examine proposal in relation to the potential density of the site and parking and traffic movements generated from the development. Infrastructure actions need to be identified and be in place to accommodate the development **(494 Eleanor Burns)**
- Number of houses should be reduced to be in-keeping with existing development (**1127 G Watson)**
- Development Principles should be re-worded to state 'a mix of family style housing in the context of the locale'. Table 4 should read 'indicative maximum capacity of 260 units' **(2716 NHS National Services Scotland)**
- Seeks clarity that there is no impediment to develop land at Stenhouse Market Gardens which falls under the Ellen's Glen Road site brief in advance of the larger site **(2256 Edinburgh and Lothians Health Foundation)**
- Remove land behind the former 'Mount Alvernia' (85 Lasswade Road and 1-8 (Inclusive Nos.) former Convent of the Poor Clares Collettines from the Plan **(2494 Lisa Browning; 2502 Neil Thomson)**

Representations seeking removal of HSG 30 Moredunvale

- Remove proposal from plan **(1221 Moredun 4 Multis Residents Association; 1226 Goodtrees Neighbourhood Centre; 2126 Cockburn Association and individuals in Appendix B)**

Representations opposed to HSG 30 Moredunvale in current form and seeking its removal and/or change

- Remove housing proposal and build a new car park **(0020 Allan Millar)**
- Insert new bullet point to HSG 31 Moredunvale "reprovision of sports pitch" **(0124 sportscotland)**
- Suggests housing could be built at the Edinburgh BioQuarter instead. **(0475 Tim Kingwell)**
- Applicants should explore opportunities to link south beyond the proposed allotments. Without this link the proposed development appears likely to decrease accessibility to greenspace for adjacent communities to the south **(2697 Scottish Natural Heritage)**
- Amend Table 4 and the Development Principles on page 67 to refer to the requirement for a flood risk assessment to be carried out to inform the design and layout of the finalised scheme. The assessment would need to consider any bridges adjacent and downstream of the site and any work downstream at Greendykes **(2699 Scottish Environment Protection Agency)**

Representations seeking removal of HSG 31 Curriemuirend

- Remove proposal from the Plan.

(0170 Balerno Community Council; 0184 Curriemuirend Park Allotment

Association; 0305 Colinton Amenity Association; 0321 Ratho & District Community Council; 1150 Bill Henderson; 1213 Friends of Currimuirend Park; 1554 Wester Hailes Community Council; 1638 Juniper Green / Baberton Mains Community Council; 1755 Cairn Housing Association; 2126 Cockburn Association; 2189 Currie Community Council; and individuals in Appendix C)

Representations opposed to HSG 31 Curriemuirend in current form and seeking its removal and/or change

- Suggests developing other sites such as East of Milburn Tower **(0046 Dorothy Curr; 2133 R MacKay; 2195 W Blair; 2199 S Blair)** Edinburgh Park **(0145 Douglas Webb; 0155 Catherine Webb; 0161 Mary Sandilands)** and The Gyle **(0391 Holman)**
- Table 9 should include a reference to transport improvements in the Juniper Green/Currie/Balerno area to ensure the existing road network and safety related issues are significantly improved before any additional housing is permitted. Asks that the Currie/Balerno bypass safeguard (Safeguard T7) in the Rural West Edinburgh Local Plan be re-instated in the Plan. No new housing development ahould be allowed until the bypass is built. **(480 Currie East Neighbourhood Watch)**
- Notes incorrect referencing of GS10 and HSG29 in the Plan. Curriemuirend Park should be assessed as a wildlife park rather than a play park in the Open Space Audit. It should be graded as a high quality wildlife park. **(1213 Friends of Currimuirend Park)**
- Remove proposal from plan, the ite layout and use of a cul-de-sac, access from one entry point is contrary to policy **(1849 Roy Brown)**
- Recommends that the site brief shows an indicative path route through the allotments linking to Clovenstone Drive. Bullet point 4 should clarify what 'better pedestrian cycle access' is. Sggest that this is phrased in the terms used in paragraphs 46 and 280 of Scottish Planning Policy. **(2697 Scottish Natural Heritage)**

Representations seeking removal of GS 10 Curriemuirend

- Remove proposal from the Plan.

  (0370 Malcolm Stewart; 0418 John Smith; 0833 Roseann Ferguson; 2233 E Beevers; 2237 Cliff Beevers)
-

Representations seeking removal of Hsg 31 and GS 10 Curriemuirend

- Remove proposal from the Plan.

  (1638 Juniper Green/Baberton Mains Community Council, 2706 Juniper Green Community Council and individuals in Appendix D)

Summary of responses (including reasons) by planning authority:

Representations seeking removal of HSG 28 Ellen's Glen Road

- **Principle.** The site has been allocated in the Plan to establish the principle of a co-

ordinated housing development across two adjoining sites, one of which involves the loss of open space. These two sections of the site were identified by a representation to the first Proposed Plan regarding development on the open space, and through the LDP Housing Land Study (June 2014), which identified brownfield land potentially available for development (see page 13). The open space is identified as such in the Open Space Audit (2009,reference 'NAT 35'). The loss of currently inaccessible semi-natural green space would not be detrimental to the wider network open space and the value of established trees to biodiversity, local character and amenity would be assessed against Policies Des 3 and Env 12. The Development Principles on Page 66 of the Plan require the alternative provision of open space to be provided as part of the development in the form of a new local greenspace to meet the Council's Local Greenspace Standard (Open Space Strategy pages 12-13)

- **Transport infrastructure**. As part of the Local Development Plan process, the Council has carried out a Transport Appraisal. (Volumes 1 and 2, 2013, Addendum, 2014) Page 44 of the Addendum summarises the findings for this site. The TA identifies improvements to transport infrastructure to deal with the net impact of new housing proposals in South East Edinburgh. The transport actions for HSG 28 are set out in the Council's Proposed Action Programme on Page 32 and include upgrading bus stops on Lasswade Road and Gilmerton Road and new pedestrian and cycleway access. The detail of these actions is being established through transport assessments required at the planning application stage. In terms of access points, the development principles indicate two access points for HSG 28 to allow for HSG 28 to come forward for development in advance of Liberton Hospital. HSG 28 is to make provision for an access to be taken off Lasswade Road if the Liberton Hospital was to come forward for development. A proposed new cycle / footpath is proposed to increase the modal share of walking and cycling. All relevant proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.
- **School infrastructure.** As part of the Plan process, the Council has prepared a Revised Education Appraisal June 2014 (corrected September 2014) which identifies the improvements to school infrastructure to deal with the net impact of new housing proposals in South East Edinburgh. Ellen's Glen Road has been assessed within the Liberton and Gilmerton Contribution Zone, pages 16-20. For HSG29 Ellen's Glen Road a ratio of 60:40 flats to house has been assumed to reflect the surrounding area and nature of the site. The type of development and pupil generation will be monitored as planning applications are received and, if necessary, any required changes will be reflected in the Action Programme.
- **Community facilities.** The Plan in paragraph 72 acknowledges that housing proposals will have implications for the provision of primary healthcare and other community health services. Policy Hou 10 Community Facilities seeks to ensure that where practical and reasonable a range of community facilities is provided with new housing development.

  The Plan identifies where non-residential units should be provided in new housing sites which could provide potential premises for new health practices. Paragraph 130 of the Plan states that developer contributions to measures intended to mitigate the net effects of development, other than actions identified in the Action Programme, may also be required.

  The Council has discussed all growth allocations with the relevant part of the NHS Lothian. This has assessed the need for new and expanded general practitioner practices to accommodate the planned housing growth set out in the Second

Proposed Plan No specific actions have been included in the Action Programme at this time, however when suitable and specific actions are identified these will be included in future iterations of the Action Programme. Where these are needed to address demand arising from new development, financial contributions towards the cost may be sought in line with relevant policies and guidance.
The level of housing proposed will not have strategic implications for the policing of the area.

- **Drainage and flood risk**. In preparing a Local Development Plan, the Council must consider the impact of development on flood risk. The new Local Development Plan proposals have been assessed strategically for flood risk using a fluvial flood risk map showing areas at medium-to-high risk (i.e. a 1-in-200 year event) (Figure 3 of the Environmental Report Volume 1, page 21 and Volume 2 page 52). New development on this site is not considered to be at particular risk of fluvial flooding. Surface water flooding risk is addressed in all new development through the incorporation of sustainable urban drainage systems, as required by Plan Policy Des 6. Policy Env 21 provides further measures against the risk of flooding to new development.
- **Impact on listed buildings and trees.** At masterplan and planning application stage development in would be assessed against its impact upon the existing listed buildings and their curtilage at 'Mount Alvernia' (85 Lasswade Road and 1-8 (Inclusive Nos.) -former Convent of the Poor Clares Collettines, including gatepiers and boundary walls). Notwithstanding historic environment considerations, Policy Des 4 on Development Design – Impact on Setting would apply. The development principles also provide for tree retention on site to be determined in accordance with Policy Env 12 – Trees.
- **Cottage Flats** – it is acknowledged that the term 'cottage flats' is not commonly used or widely know. If the Reporter was minded, the Council would see merit it its omission from the Ellen's Glen Road Road Development Principles on Page 66.

No modification proposed.

(1064 Malbet and Yewlands Residents Association; 2006 Liberton & District Community Council; 2126 Cockburn Association; **2662 Ian Murray and individuals in appendix A)**

<u>Representations opposed to HSG 28 Ellen's Glen Road in current form and seeking its removal and/or change</u>

- The density assumption at HSG 28 Ellen's Glen Road has been based on the Council's Housing Land Study (June 2014). The study on Page 12 identifies a range of densities for sites over 1ha based on the surrounding area. For Ellen's Glen Road this has been set at 65 dwellings per hectare based on a mix of houses and flats similar to the recent 'Evolution' development at Gracemount which has similar accessibility characteristics. The capacity range in Table 4 therefore identifies a range of 220 – 260 on a 4 hectare site. The actual number and type of units will be determined at the planning application stage. No modification proposed. **(494 Eleanor Burns, 1127 G Watson, 2716 NHS National Services Scotland)**
- In order to establish a principle of a co-ordinated housing development which involves the loss of some open space, the whole site has been allocated as a housing proposal in the Plan. It is proposed to allocate the area of open space at Stenhouse Market Gardens (Malbet Wynd) for housing as part of a wider housing

allocation on the adjacent land which is currently occupied by the blood transfusion centre at Liberton Hospital. The blood transfusion centre is to relocate to Riccarton Campus. This removes the open space policy impediment on the land at Stenhouse Market Gardens. No modification proposed. **(2256 Edinburgh and Lothians Health Foundation; 2494 Lisa Browning; 2502 Neil Thomson)**

Representations seeking removal of HSG 30 Moredunvale

- **Principle.** The Council's regeneration priorities are to ensure that people live in well designed, resilient, supportive and safe communities with access to services and amenities. To help deliver these, the Council in preparing this Plan has sought potential investment opportunities for new housing and environmental improvements on Council-owned land. These included four potential sites for new housing development on existing open space. These were presented in the Main Issues Report (page 21 and Question 7) as opportunities for new housing and smaller but better quality areas of open space. Views were sought on the principle of allocation in the Plan, or continued allocation of the sites as open space with potential for any proposals to be considered as planning applications.
  This approach is consistent with advice on local authority interest development. Where a local authority intends to pursue or support particular development projects such as housing on Council owned land, particularly green space, they ought to be proposed, consulted on and agreed through the Local Development Plan. This ensures that the authority's intentions are clearly known from the outset, allowing for any necessary public debate and scrutiny of local authority proposals as part of the wider considerations of the future planning of the area. Planning Advice Note 82 paragraphs 12-14 and Scottish Planning Policy paragraphs 230-231 are relevant.
  The responses are set out in the Summary of Responses to the Main Issues Report, April 2012 (pages 80-84). They included qualified support for the Council's proposals.
  The Development Principles on Page 67 of the Plan identify the loss of half of the site for housing development, and to improve the quality of the remaining open space. The Open Space Audit (2009, reference 'AM 72') identifies the site as a publicly accessible residential amenity space of 'fair' quality. The Plan proposes that the development provides better quality play space, allotments and growing spaces as greenspace improvements to the area. In addition, there are other areas of open space in the vicinity of the site which are to be upgraded or provided through the Open Space Strategy including Gilmerton Park located to the South and the South East Wedge parklands to the east. In this way, the proposal would result in provision of smaller but better greenspace which would provide a higher quality of provision to local residents.
  Impact on residential amenity of adjacent housing arising from effects on daylight, privacy and sunlight is a matter of detailed design and would be addressed at the masterplan and planning application stage.
- **Feasibility study and site layout.** As Moredunvale Road is Council-owned and to ensure that site can be made effective during the relevant time period, in this case up to 2024, the Council commissioned feasibility work. This feasibility study took one option for the design, layout, height type of properties for feasibility assessment only. The detailed design and layout will be addressed at the masterplanning and and planning application stage.
- **Transport infrastructure.** As part of the Local Development Plan process, the Council has carried out a Transport Appraisal. (Volumes 1 and 2, 2013,

Addendum, 2014) This appraised the cumulative impact of the new developments proposed in the Plan, taking account of other factors. This identifies improvements to transport infrastructure to deal with the net impact of new housing proposals in South East Edinburgh, including this site. These transport actions are set out in the Council's Proposed Action Programme on Page 36. For HSG 30 Moredunvale, the actions include improving pedestrian and cycle facilities within the area. The detail of this action will be established through transport assessments required at the planning application stage. All relevant proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.

- **School infrastructure.** As part of the Plan process, the Council has prepared a Revised Education Appraisal June 2014 (corrected September 2014) which identifies the improvements to school infrastructure to deal with the net impact of new housing proposals in West Edinburgh. These Education actions are set out within the Council's Proposed Action Programme. For HSG 30 Moredunvale these actions are set out on pages 24-27 of the accompanying proposed Action Programme. They include a contribution requirement towards additional capacity within both the non-denominational and denominational primary and high school estate. This includes two new primary schools at Broomhills (ND) primary school (SCH 8) and New Gilmerton South (ND) primary school (SCH 7) and an extension to either Liberton or Gracemount High School. All proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance.
- **Community facilities.** The Plan in paragraph 72 acknowledges that housing proposals will have implications for the provision of primary healthcare and other community health services. Policy Hou 10 Community Facilities seeks to ensure that where practical and reasonable a range of community facilities is provided with new housing development.
  The Plan identifies where non-residential units should be provided in new housing sites which could provide potential premises for new health practices. Paragraph 130 of the Plan states that developer contributions to measures intended to mitigate the net effects of development, other than actions identified in the Action Programme, may also be required.
  The Council has discussed all growth allocations with the relevant part of the NHS Lothian. This has assessed the need for new and expanded general practitioner practices to accommodate the planned housing growth set out in the Second Proposed Plan No specific actions have been included in the Action Programme at this time, however when suitable and specific actions are identified these will be included in future iterations of the Action Programme. Where these are needed to address demand arising from new development, financial contributions towards the cost may be sought in line with relevant policies and guidance.
- **Flooding, sewerage, subsidence and impact on residential amenity** In preparing a Local Development Plan, the Council must consider the impact of development on flood risk. The new Local Development Plan proposals have been assessed strategically for flood risk using a fluvial flood risk map showing areas at medium-to-high risk (i.e. a 1-in-200 year event) (Figure 3 of the Environmental Report Volume 1, page 21 and Volume 2 page 52) The portion of the site which is at risk from fluival flooding is the northern corner, which is not identified for development in the Development Principles on page 67. The issue of flood risk for all developments, not just Plan proposals is addressed through Policy Env 22. Sewage, subsidence and other environmental issues including the impact on residential amenity is addressed through Policy Env22 and the Moredunvale

Development Principles on Page 67. The Moredunvale Development Principles identify that remediation work may be required to develop the site due to the history of coal and limestone mining.

No modification proposed.

(1221 Moredun 4 Multis Residents Association; 1226 Goodtrees Neighbourhood Centre; 2126 Cockburn Association and individuals in Appendix B)

Representations opposed to HSG 30 Moredunvale in current form and seeking its removal and/or change

- It is not considered that previous changing to parking provision are an issue for this Development Plan. **(0020 Allan Millar)**
- Formal sports pitch provision is identified in the Open Space Audit (2009). It identifies those pitches which are maintained as such for communities schools and sportsclub use. This is not such a location, and no formal sports pitch is recorded. Goodtrees Playing Field lies to the west of the site and Goodtrees Neighbourhood Centre. Requirements for new playing fields are set out in the Council's Physical Activity and Sport Strategy (2014) No modification proposed. **(0124 sportscotland)**
- Approved Supplementary Guidance for the Edinburgh BioQuarter and South East Wedge Parkland allows for residential development provided that it helps to develop a "mixed use, urban quarter", an aim of the SG. Any residential development should contribute to the overall aims for density, mixed uses and urban form and should not take place on isolated sites. No modification proposed. **(0475 Tim Kingwell)**
- There are substantial changes in level across the land to the south of the site. Any masterplan submitted, would be assessed against the requirements of Policy Des 7 – Layout Design, in terms of the comprehensive approach to the layout of built form, streets, paths and open spaces. This is further illustrated on pp 27-30 of the Edinburgh Design Guidance. This should not result in a detrimental effect on access to greenspace for communities to the south of Moredun Park Road. No modification proposed. **(2697 Scottish Natural Heritage)**
- In preparing a Local Development Plan, the Council must consider the impact of development on flood risk. The new Local Development Plan proposals have been assessed strategically for flood risk using a fluvial flood risk map showing areas at medium-to-high risk (i.e. a 1-in-200 year event) (Figure 3 of the Environmental Report Volume 1, page 21 and Volume 2 page 52) The portion of the site which is at risk from fluival flooding is the northern corner, which is not identified for development in the Development Principles on page 67. The issue of flood risk for all developments, not just Plan proposals is addressed through Policy Env 2. Sewage, subsidence and other environmental issues including the impact on residential amenity is addressed through Policy Env 22. The Moredunvale Development Principles on Page 67 identify that remediation work may be required to develop the site due to the history of coal and limestone mining. **(2699 Scottish Environment Protection Agency)**

Principle - HSG 31 Curriemuirend and GS10 Curriemuirend

- The Council's regeneration priorities are to ensure that people live in well designed, resilient, supportive and safe communities with access to services and

amenities. To help deliver these, the Council in preparing this Plan has sought potential investment opportunities for new housing and environmental improvements on Council-owned land. These included four potential sites for new housing development on existing open space. These were presented in the Main Issues Report (page 21 and Question 7) as opportunities for new housing and smaller but better quality areas of open space. Views were sought on the principle of allocation in the Plan, or continued allocation of the sites as open space with potential for any proposals to be considered as planning applications.
This approach is consistent with advice on local authority interest development. Where a local authority intends to pursue or support particular development projects such as housing on Council owned land, particularly green space, they ought to be proposed, consulted on and agreed through the Local Development Plan. This ensures that the authority's intentions are clearly known from the outset, allowing for any necessary public debate and scrutiny of local authority proposals as part of the wider considerations of the future planning of the area. Planning Advice Note 82 paragraphs 12-14 and Scottish Planning Policy paragraphs 230-231 are relevant.

The responses are set out in the Summary of Responses to the Main Issues Report, April 2012 (pages 80-84). They included qualified support for the Council's proposals.
The Development Principles on Page 69 of the Plan require a comprehensive approach to both HSG 31 Curriemuirend and GS10 Curriemuirend to deliver proposed allotments and greenspace improvements in connection with new housing development.
The Open Space Audit (2009, references 'PG 64' and 'PG 63) identifies Curriemuirend Park as a publicly accessible community park of 'fair' quality, and GS 10 as an unclassified park with no quality score. The Open Space Audit (2010) includes as an action the improvement of Curriemuirend Park to 'good' standard to meet Local and Large Greenspace Standards. As one of the Council's parks, it has been a priority for maintenance. However, the potential of Curriemuirend Park to be a safe and pleasant place is fundamentally constrained by its lack of natural surveillance, the barriers presented by major roads to its west and north-east and the reliance on unwelcoming underpasses for active travel through-routes. These constraints are a legacy of the original design or greenspace and road engineering and cannot be readily overcome by further investment in Curriemuirend Park. The greenspace at Clovenstone Drive is more overlooked, has existing well-used and more welcoming through-routes, and therefore has greater potential to benefit from investment as a park.

The LDP proposals are for the inherent design problems of Curriemuirend Park to be addressed by its partial development for housing incorporating smaller, better greenspace, and for a major improvement in the greenspace at Clovenstone Drive (Proposal GS 10) to mitigate the overall reducation in quantity of greenspace.

The land is not green belt and does not have a role in preventing coalescence between different settlements. Loss of woodland would be required to be offset in accordance with Scottish Government's Control of Woodland Removal Policy, including through street tree planting within the site, parkland trees at Clovenstone Drive and supplementary planting within the wider network of public open space. Enhancements to the existing open space at Clovenstone Drive will be required to demonstrate their value to conservation of natural features, wild fauna and flora, in

line with the Council's Park Quality Assessment methodology (page 4). In addition to the proposed allotments, new development should incorporate features to enhance biodiversity, in line with Des 3 Development Design – Incorporation and Enhancing Existing and Potential Features e.g. provision of nest boxes.

Representations seeking removal of HSG 31 Curriemuirend

- **Feasibility study** As Curriemuirend Park is Council owned and to ensure that site can be made effective during the relevant time period, in this case up to 2024, the Council commissioned feasibility work. The study concluded that the site was technical feasible to develop for housing, but that the scheme in the study would not be financially viable at this point in time due to site constraints, risks, and planning principles associated with the development of this site. However, the financial appraisal does not and cannot provide a view on the future viability of the site throughout the Local Development Plan period. Future viability will be dependent on economic circumstances, market conditions, the actual scheme a developer wishes to take forward and other factors which cannot be predicted at this time. Therefore the study does not rule out the viability and hence effectiveness of the site over the next ten years, but it has confirmed the technical feasibility and potential capacity of the site. As a consequence, the Council has more information about the technical and economic feasibility of specific options for these two sites than about any other sites in the Plan. This is more than is needed for the approval of a Plan allocating those two sites.
- **Transport infrastructure -** As part of the Local Development Plan process, the Council has carried out a Transport Appraisal. (Volumes 1 and 2, 2013, Addendum, 2014) This appraised the cumulative impact of the new developments proposed in the Plan, taking account of other factors. This identifies improvements to transport infrastructure to deal with the net impact of new housing proposals in South West Edinburgh. These transport actions are set out in the Council's Proposed Action Programme on Page 42. For HSG 31 Curriemuirend, the actions include improvements to Gillespie Crossroads and Hermiston Park and Ride. Details will be established through transport assessments required at the planning application stage. All relevant proposals will be required to make appropriate contributions to new and improved infrastructure in line with relevant policies and guidance. These are actions in the Action Programme and will be updated as they progress. It is not necessary to add these to the Transport proposals in Table 9.
  A number of representations refer to Planning Appeal PPA – 230 – 2112 which considered the impact of developments in South West Edinburgh on Gillespie Crossroads. The appeal reporter's findings relate to the appeal site and the decision before him. It was not within his remit or powers to carry out or request a cumulative transport assessment for the appeal site looking at the impact and potential mitigation at the Gillespie Crossroads. He saw the Council's evidence that such a study had not been done for the appeal proposal. For his purposes, there was no ready solution. In response to this appeal the Council's appeal statement highlighted on page 2 that the cumulative traffic impact of potential development in the Lanark Road corridor needs to be assessed as part of the Plan process.
  The Development Principles make reference to the opportunity to reduce Wester Hailes Road to one carriageway; this was identified in the brief to allow for more attractive, safe environment for pedestrians and to create an active frontage. The opportunity to reduce the Wester Hailes Road will be considered at the mastreplanning and planning application stage and will need to be addressed by a

Transport Appraisal to be submitted by the applicant.

- **School infrastructure.** As part of the Plan process, the Council has prepared a Revised Education Appraisal June 2014 (corrected September 2014) which identifies the required improvements to school infrastructure to deal with the net impact of new housing proposals across Edinburgh. Where required these Education actions are set out within the Council's Proposed Action Programme. HSG 31 Curriemuirend lies in the Currie High School catchment and due to there being no capacity within its catchment school, Juniper Green Primary, it is proposed to make a catchment change to transfer the site to the adjacent Clovenstone Primary School and Wester Hailes Education Centre catchments. There is spare capacity at both of these schools to accommodate the proposed development.
- **Community facilities.** The Plan in paragraph 72 acknowledges that housing proposals will have implications for the provision of primary healthcare and other community health services. Policy Hou 10 Community Facilities seeks to ensure that where practical and reasonable a range of community facilities is provided with new housing development.
  The Plan identifies where non-residential units should be provided in new housing sites which could provide potential premises for new health practices. Paragraph 130 of the Plan states that developer contributions to measures intended to mitigate the net effects of development, other than actions identified in the Action Programme, may also be required.
  The Council has discussed all growth allocations with the relevant part of the NHS Lothian. This has assessed the need for new and expanded general practitioner practices to accommodate the planned housing growth set out in the Second Proposed Plan No specific actions have been included in the Action Programme at this time, however when suitable and specific actions are identified these will be included in future iterations of the Action Programme. Where these are needed to address demand arising from new development, financial contributions towards the cost may be sought in line with relevant policies and guidance.
- **Drainage and flood risk**. In preparing a Local Development Plan, the Council must consider the impact of development on flood risk. The new Local Development Plan proposals have been assessed strategically for flood risk using a fluvial flood risk map showing areas at medium-to-high risk (i.e. a 1-in-200 year event) (Figure 3 of the Environmental Report Volume 1, page 21 and Volume 2 page 157) Appropriate licensing of such works would be required. The issue of flood risk for all developments, not just Plan proposals is addressed through Policy Env 2.

No modification proposed.

<u>Update from Capital Coalition Motion 14 May 2015:</u>

The Council sees merit in the representations objecting to housing Proposals HSG 31 Curriemuirend, and HSG 36 Curriehill Road and HSG 37 Newmills Road (see Issue 12) and notes that their removal from the Plan would account for 435 units of the capacity provided for by the allocation of East of Millburn Tower (see Issue 14).

(0170 Balerno Community Council; 0184 Curriemuirend Park Allotment Association; 0305 Colinton Amenity Association; 0321 Ratho & District Community Council; 1150 Bill Henderson; 1213 Friends of Currimuirend Park; 1554 Wester Hailes Community Council; 1638 Juniper Green /

Baberton Mains Community Council; 1755 Cairn Housing Association; 2126 Cockburn Association; 2189 Currie Community Council; and individuals in Appendix C)

Representations opposed to HSG 31 Curriemuirend in current form and seeking its removal and/or change

- Transport Infrastructure, open space and biodiversity as addressed above. Representations have identified other sites as an alternative to HSG 31. However because of the increased housing requirement for Edinburgh, these are in addition to HSG 31, not alternatives. This includes Edinburgh Park **(0145 Douglas Webb; 0155 Catherine Webb; 0161 Mary Sandilands)** and The Gyle **(0391 Holman).** Other suggested sites within Edinburgh are not considered appropriate for the reasons set out in the Revised Environmental Report June 2014. This includes East of Milburn Tower site **(0046 Dorothy Curr; 2133 R MacKay; 2195 W Blair; 2199 S Blair)** No modification proposed.
- The Currie Bypass was a safeguard in the Rural West Edinburgh Local Plan (Transport Safeguard T7). However, it is no longer appropriate or necessary in terms of the principles and priorities in the Local Transport Strategy nor is it justified by the LDP Transport Appraisal Addendum. No modification proposed. **(480 Currie East Neighbourhood Watch)**
- It is acknowledged that changing the name of proposal GS10 Curriemuirend would be appropriate. Should the Reporter be so minded, the Council would see merit in an amendment to Table1 to refer to GS10 Clovenstone Drive. Curriemuirend Park is identified within the Open Space Audit on Page 28 as a Community Park and of fair quality. It makes no further reference. No modification proposed. **(1213 Friends of Currimuirend Park)**
- Whilst Policy Des 5 of the plan states that cul-de-sac and single access residential layouts and gated communities should be avoided to help the integration of new development into the wider neighbourhood, it is accepted that developments of up to 200 units normally utilise one access point. The design and layout of the proposed development will need to comply with the Edinburgh Design Guidance and this will be assessed at the masterplan and planning application stage. No modification proposed. **(01849 Roy Brown)**
- The site brief on page 69 of the Second Proposed Plan June 2014, identifies the principal access points in terms of pedestrian/cycle access and the Development Principles require these to connect with the allotments and Clovenstone Park. Any masterplan submitted, would be assessed against these requirements and Policy Des 7 – Layout Design, in terms of the comprehensive approach to the layout of built form, streets, paths and open spaces. This is further illustrated on pp 27-30 of the Edinburgh Design Guidance. No modification proposed **(2697 Scottish Natural Heritage)**

Representations seeking removal of GS 10 Curriemuirend

- The Development Principles on Page 69 of the Plan require a comprehensive approach to both HSG 31 Curriemuirend and GS10 Curriemuirend to ensure that the proposed allotments and Greenspace improvements are delivered. No modification proposed. **(0370 Malcolm Stewart; 0418 John Smith; 0833 Roseann Ferguson; 2233 E Beevers; 2237 Cliff Beevers 0418)**
- Loss of woodland would be required to be offset in accordance with Scottish

Government's Control of Woodland Removal Policy, including through street tree planting within the site, parkland trees at Clovenstone Drive and supplementary planting within the wider network of public open space. Enhancements to the existing open space at Clovenstone Drive will be required to demonstrate their value to conservation of natural features, wild fauna and flora, in line with the Council's Park Quality Assessment methodology (page 4). In addition to the proposed allotments, new development should incorporate features to enhance biodiversity, in line with Policy Des 3 Development Design – Incorporation and Enhancing Existing and Potential Features e.g. provision of nest boxes. No modification proposed. **(0370 Malcolm Stewart; 0833 Roseann Ferguson)**

Representations seeking removal of HSG 31 Curriemuirend and GS 10 Curriemuirend

- The Council's response and reasoning regarding issues relating to site selection,education and transport infrastructure is set out for each site individually above.

No modification proposed.

(1638 Juniper Green/Baberton Mains Community Council, 2706 Juniper Green Community Council and individuals in Appendix D)

Reporter's conclusions:

General

1. The housing land requirement is set out in the strategic plan for the area - SESplan. Its associated supplementary guidance- Housing Land November 2014 breaks down the requirement for each of the council areas including the City of Edinburgh. There is a statutory requirement for this local plan to demonstrate consistency with SESplan. In this context the proposed plan must identify a corresponding supply of housing land, which should be effective or capable of becoming effective over the plan period.

2. These matters are assessed in more detail in the conclusions section of Issue 5. I recognise the importance of the city's significant brownfield resource in providing future housing and enabling regeneration of the waterfront and other areas. However, I also accept that given the extent of the housing land requirement combined by the often long lead in times and high costs of delivery associated with brownfield sites these would not alone achieve consistency with the strategic plan. The assessment undertaken through Issue 5 demonstrates the requirement for green field sites to contribute to the housing land supply particularly in the first five year period if the SESplan target is to be met.

3. The Strategic Development Plan for Edinburgh and South East Scotland (SESplan) identifies 4 Strategic Development Areas (SDAs) in Edinburgh – to be the biggest areas of change over the 10 year plan period. As such these SDAs are intended to provide the focus for new housing development, investment opportunities and job creation in locations that can demonstrate good accessibility to existing or planned public transport services. In line with the overall strategy, in addition to identifying significant development proposals in the SDAs, the new plan also seeks to support change in appropriate locations elsewhere - including through regeneration opportunities, redevelopment of vacant sites and use of empty commercial units, as well as through increasing densities of development.

4. SESplan Policy 9 requires local development plans to provide policy guidance that will require sufficient infrastructure to be available, or its provision to be committed, before development can proceed. The council's site assessment and the action plan, which has been prepared to accompany the proposed plan, seek to address these matters. However, there is understandable local concern about the sufficiency of these provisions and how and when they might be delivered.

5. SESplan through paragraph 130 states that local planning authorities should seek to minimise the loss of land from the Green Belt whilst balancing the need to achieve sustainability objectives. Where development in the green belt is required to achieve the strategy, effort should be made to minimise the impact on Green Belt objectives and secure long term boundaries. Scottish Planning Policy in paragraph 50 states that " In developing the spatial strategy, planning authorities should identify the most sustainable locations for longer-term development and, where necessary, review the boundaries of any green belt." Whilst the objective of retaining long term robust boundaries for the green belt applies the proposed plan must respond to the strategic development requirements as established through SESplan.

6. It is in the above context, and taking into consideration the conclusions and recommendations of Issue 5 of this report that I have assessed the merit of the representations referred to below. My focus is on the sufficiency of the plan rather on the assessment of whether any alternative site, such as East of Millburn Tower, would be preferable to ones proposed by the council. My remit would only enable a recommendation to remove sites from the plan if I were to conclude that they were unacceptable when assessed against the relevant planning issues raised in a representation. The conclusions on Issue 5 and the identified shortfall in the land supply point to the need to add to the land supply. This conclusion would not support a scenario whereby one acceptable housing site was replaced by another, even if it were demonstrated to be preferable.

7. The sites being examined under this issue were selected through the council's assessment process. This established a range of criteria against which the suitability of sites for inclusion could be assessed and compared. The criteria used for the housing site assessment are set out in Tables 6 and 7 of the Environmental Report 2nd Revision (Volume 1). The council has assessed each of the sites selected and allocated in the plan - the statutory assessment of their likely environmental effects is set out in the Appendices of that report. In responding to the matters raised in representation on these sites I have drawn on these assessments along with the Habitat Regulation Appraisal and the council's Second Action Programme May 2015.

8. I note that each of the sites with unresolved representations under this particular issue heading have been identified by the council as new proposals for housing development – additional to those being carried forward from the adopted plan into the proposed plan. These new sites are all listed in Table 4 of the plan. It is in this context that I now examine each of those sites that have become the subject of unresolved objections. These are considered in the order that they have been listed above.

Site HSG 28 Ellen's Glen Road

9. This site, located immediately to the north east of Liberton Hospital comprises the existing Scottish Blood Transfusion Service and other commercial premises – all of which appeared to be operational at the time of my site visit – together with a broadly

rectangular area of fenced off, unmanaged open ground with some boundary tree planting. That open area, known as the Stenhouse Market Gardens, forms the north-western part of the site. The council points out that the planned relocation of the Blood Transfusion Service's operations from this site would remove an existing impediment on development of the open space area at Stenhouse Market Gardens. The site is bounded to the north, east and south by residential areas.

10. All of the above land parcels making up the 4 hectares site are owned by the Edinburgh and Lothians Health Foundation who are supporters of the proposal to allocate the whole site for housing development. That is also the view of one of the individuals who made representations, in part based on his concerns about existing noise disturbance arising directly and indirectly from the current site operations. All of the other representations oppose the HSG 28 site allocation, either seeking its deletion outright or in some cases arguing for its deferral unless and until the adjoining Liberton Hospital site becomes available. They point out that this would enable the HSG 28 site to be served via a new direct access onto Lasswade Road, rather than relying on existing local road accesses.

11. The objectors raise concerns covering a wide range of topics which I have considered under the following broad headings – site selection (including with reference to the loss of valued land and associated ecological issues); transport infrastructure; education; other community infrastructure issues; flood risk, water services and associated land management issues; scale and form of the development. I have set out below my assessment and conclusions relating to these and related matters.

Site Selection

12. One of the main concerns raised is that the proposed allocation would result in a loss of open space (Stenhouse Market Gardens) at the northern end of the site. As I noted at my site visit, this parcel of unmanaged land is bounded partly by a high perimiter wall and elsewhere by a fence. Accordingly, this open space is not accessible for use by those living in the residential properties that border it – or by the wider general public. Nevertheless, this semi-natural parcel of ground with mature trees along its border is considered locally to have ecological value and is a visual amenity enjoyed by the community, in particular by those whose properties overlook it. I consider that this inaccessible green space, whilst having some value, as summarised above, is not of particular quality. In my opinion this, combined with its inaccessibility, mean that its loss would not necessarily be significantly detrimental to the overall local open space network. In coming to this view I note that in the event of allocation HSG 28 proceeding, under the terms of the site brief's development principles set out on P66 of the proposed plan – as well as with reference to policy Env 12 of the plan - existing trees would be retained where appropriate. Furthermore, I note the commitment made for the loss of open space here to be compensated by the provision of new local greenspace under the council's Open Space Strategy.

13. Some representations express concerns that if the proposed allocation was approved and implemented this would result in increased pressure on the existing areas of local open space maintained by residents of the houses of Malbet Park and Malbet Wynd to the north of site HSG 28. I noted at my site visit that the only vehicular access serving these established residential areas is from Lasswade Road via Malbet Park which leads through only to Malbet Wynd. The carefully planned layout and street design of this attractive housing area is such that this local "network" of winding roads serving it is in

reality a cul-de-sac and it has been traffic-calmed to enhance its residential environment.

14. Nevertheless, there are existing pedestrian and cycle corridor links off Malbet Wynd that enable non-motorised access directly to and from nearby Liberton High School immediately to the east of here. There is also a similar, street-lit surfaced cycleway and footpath link (Via Regis) southwards to Ellen's Glen Road – at a point east of the HSG 28 site. Accordingly, the access to the local areas of open space at Malbet Park and Malbet Wynd is not exclusive to existing residents. These areas are also available for the enjoyment of others passing through these residential areas. In this local context, whilst I appreciate that these existing open spaces are valued and well maintained by residents of Malbet Park and Malbet Wynd, I am not persuaded that the proposed opening up of a vehicular route through the HSG 28 site to link onto Malbet Wynd would of itself necessarily result in those spaces being compromised significantly. I consider the road traffic management issues and related road safety concerns of that proposed routeing separately below. Meanwhile, for the reasons outlined above, I conclude that concerns about adverse impacts on the quantity and quality of existing green spaces in and around the site in question do not provide sufficient justification to delete the proposed allocation of site HSG 28.

Transport Infrastructure

15. The proposed plan includes on page 66 the Site Brief for HSG 28. This sets out a series of development principles for this development that would involve the relocation of the Blood Transfusion Service and adjoining commercial premises to then enable housing development on this brownfield site, as well as on the semi-natural Stenhouse Market Gardens land adjacent to Malbet Wynd. The first of the development principles states that vehicular access for this new housing, comprising 220-260 housing units, is to be taken from Ellen's Glen Road (to the south-east of the site) and Malbet Wynd (to the north) – and this is reflected in the accompanying diagram. The Site Brief also states that if the adjoining site (to the south-west) currently occupied by Liberton Hospital becomes available in the future this "could provide additional housing". Most importantly the HSG 28 Site Brief, under the Development Principles heading, states that if this hospital site becomes available in the future, proposals "would be expected to provide for direct vehicular access from Lasswade Road across the [hospital] site" to serve the site HSG 28. It then states that "any proposals for the Ellen's Glen Road site should make provision for such an access." This is reaffirmed in the Site Brief Development Principles diagram also on page 66 of the proposed plan.

16. Issue 19 references the need for further assessment to address matters raised in relation to the potential transport infrastructure to support the development strategy overall. For sites in south-east Edinburgh recommendations through Issue 21 identify specific interventions which may require cumulative contributions from a number of sites. These general development principles as recommended for inclusion in Part 1 Section 5 of the plan for South-East Edinburgh apply to all the sites included in this section of the plan but also reference the need for further assessment. Consequently, I am satisfied that these matters can be addressed through the master-plan and planning application stage when further detailed assessment to address commensurate mitigation of any individual and cumulative transport impacts would be required. Policy Tra x (Issue 19) and Del 1 (Issue 21) including its associated guidance apply the relevant policy framework in this respect.

17. I note that currently the only vehicular access to the HSG 28 site is from the south-

east via Ellen's Glen Road, which has a junction onto Lasswade Road. There is a narrow footway along the southern boundary of Ellen's Glen Road leading to that main road junction. Ellen's Glen Road actually continues north-eastwards beyond the Blood Transfusion complex turn off but is bollarded at that point so preventing through movement for vehicles. It does, nevertheless, still afford access to the more easterly section of Ellen's Glen Road for cyclists and pedestrians heading between Lasswade Road and the residential areas to the east of HSG 28.

18. The council's current proposal for allocation of HSG 28 – that excludes use of the adjoining Liberton Hospital site unless and until the hospital closes and then affords scope to provide an additional access - has prompted numerous traffic-related concerns being expressed in representations. These objections are mostly from and on behalf of neighbouring residents. They highlight issues relating firstly to the existing Ellen's Glen Road access to Lasswade Road (south of Liberton Hospital) being used to serve the proposed new housing development. They also raise concerns regarding the proposed opening up of a new vehicular access at the northern end of the site via Malbet Wynd - and from there feeding into the existing residential road network, via Malbet Park to reach Lasswade Road, to the north of Liberton Hosptial. I now consider each of those concerns in turn.

19. From my site visit I note that the western section of Ellen's Glen Road – linking the HSG 28 site to Lasswade Road - is narrow with a winding configuration. This, together with its pronounced slope rising up to the Lasswade Road junction, means that it is a local road with poor geometry that in my opinion is not well suited to serve a new housing development of the scale proposed on site HSG 28 - which would be likely to generate significantly greater traffic volumes than the exising uses on the site. The Ellen's Glen Road junction onto Lasswade Road, as well as being on a pronounced slope is itself narrow, so whilst visibility along the main road may be deemed satisfactory the local road geometry of Ellen's Glen Road makes it a difficult junction for vehicles to negotiate, even today. Indeed on my site visit I observed that this particular junction was only just capable of use by smaller vehicles heading in both directions along Ellen's Glen Road – and this was in daylight and in good weather.

20. The Second Proposed Action Programme for the proposed plan sets out a series of site-specific "Transport Actions" relating to the HSG 28 allocation. Those actions relate to upgrading bus stop provision along Lasswade Road and Gilmerton Road, a new bus stop on Gilmerton Road as well as footpath widening along Ellen's Glen Road. The council states that this reflects the outcome of a Transport Appraisal undertaken as part of the local development plan process. Most significantly I note that these transport actions do not include any planned improvements to the Ellen's Glen Road carriageway geometry or to its junction with Lasswade Road to address its present limitations, as summarised above, which have been highlighted in representations and confirmed on my site visit.

21. In the above context, in my opinion the proposed allocation appears to place unjustified reliance on the ability of Elllen's Glen Road, as currently configured, together with its existing junction onto Lasswade Road to cater for most of the traffic generated by the proposed development of 220 or more houses on the HSG 28 site. In reaching this view I have also taken into consideration the limitations of the local road network to the north of the site discussed later. Furthermore, I am concerned that the proposed footway improvements along Ellen's Glen Road might potentially compromise even the existing road carriageway width as the land boundaries either side of this section of Ellen's Glen Road are tightly constrained by boundary walls of adjoining property interests including

the hotel on the corner of Lasswade Road at its Ellen's Glen Road junction.

22. In my view the council has not adequately summarised or addressed in the Schedule 4 the nature and extent of the detailed issues that have been raised in representations regarding the limitations of Ellen's Glen Road and its access onto Lasswade Road – as highlighted above. Instead the council has simply made a brief referral to its Transport Appraisal findings that solely point to bus stop and footway improvements to serve the proposed new development.

23. Even if the council was persuaded that in principle it would be necessary or at least highly beneficial to upgrade Ellen's Glen Road to serve the new housing development, it is far from clear whether this could be readily achieved in the short term given the physical constraints of its carriageway boundaries. Any potential improvements to its junction with Lasswade Road would also raise other practical difficulties, given the existing neighbouring property boundaries and the proximity of other local roads to this junction, notably Gracemount House Drive and Carnbee Avenue.

24. I now turn to consider the representations lodged expressing concerns about the proposed new northern access to the site via Malbet Wynd. As I outlined earlier, this local residential road is a cul-de-sac and all traffic heading to or from Malbet Wynd has to use the Malbet Park junction onto Lasswade Road. That particular junction is single carriageway width in each direction and has a speed table incorporated to limit traffic speed and indicate that you are in a residential area. On my site visit I noted that there are also other traffic calming measures along both Malbet Park and Malbet Wynd, including speed table ramps and changes of surface, to reduce traffic speeds and so enhance road safety and residential amenity. It is in this context that traffic and road safety concerns have been raised in representations about the principle of the HSG 28 site being solely accessed via a combination of Malbet Wynd and Ellen's Glen Road, even if that was for a limited period until a direct route from Lasswade Road to the site (via the Liberton Hospital site) could be introduced.

25. Many of the representations raise similar road traffic issues relating to the Malbet Park estate residential area (which comprises the houses along Malbet Park and Malbet Wynd) and associated safety and amenity concerns. One of these draws attention to the council's Transport Development Handbook statement that a general access road which has only a single access (such as in the case of Malbet Park) may serve only 200 dwellings. In this context the representation points out that the Malbet Park estate already comprises 139 houses and 48 flats and the Malbet Park road junction onto Lasswade Road also serves the Mount Alvernia residential complex's car park. I also note that the pedestrian link from the estate to Liberton High School means that during term times cars from outside the area also regularly access the cul-de-sac to drop off and pick up children attending the school.

26. In this context, I can understand the concerns raised in representations about the adverse road traffic and road safety impacts likely to arise from the proposed opening of a new road access onto Malbet Wynd to serve the proposed new development of 220 or more houses on the HSG 28 site. I consider that the council in the Schedule 4 fails to adequately and fairly summarise and address these real concerns - along with those issues relating to the limitations of Ellen's Glen Road and its access onto Lasswade Road, as highlighted above. Most importantly, I find that once again the council, rather than responding to those traffic related concerns about the prospect of substantial increased loadings on the Malbet Park estate roads and the junction onto Lasswade

Road north of Liberton Hospital, relies solely on a brief referral to its Transport Appraisal findings that would lead only to bus stop and footway improvements, as outlined above.

27. In summary, given the pressures already on the tightly configured existing road network, I conclude that the council – through its responses and the site brief for HSG 28 simply showing accesses to this proposed new housing site's 220 or more houses via Ellen's Glen Road and Malbet Wynd - appears to be unreasonably disregarding local concerns regarding the significant additional traffic generation impacting on the local road and junction capacity, as well as with regard to related road safety and residential amenity considerations.

28. As noted earlier, the site brief for site HSG 28 makes reference to the possibility of the adjoining site currently occupied by Liberton Hospital becoming available at some point in the future –stating that this would provide an opportunity for a new direct vehicular access road across that site to serve the HSG 28 site. This is the only acknowledgement made by council that such a new dedicated access opportunity would be sought, if and when available.

29. In my view such a direct new access onto Lasswade Road is not simply to be encouraged if and when the opportunity arises. Instead, for the reasons summarised above, I conclude that such a new access onto Lasswade Road should be a pre-requisite for the HSG 28 site to be developed for 220 or more houses. Accordingly, I conclude that the proposals shown on the site brief for access initially at least to be solely via the existing roads – Ellen's Glen Road and Malbet Wynd - is unacceptable in traffic management, road safety and amenity terms. I also conclude, however, that if and when an additional access to the site could be achieved directly from Lasswade Road via the Liberton Hospital site then my concerns relating to sole dependance on Ellen's Glen Road and Malbet Wynd to serve the HSG 28 site would be satisfactorily addressed.

30. Against this background, a Further Information Request was sent to the council and Lothian Health seeking clarification on the prospects of the Liberton Hospital site becoming available to enable a direct link to the HSG 28 site to be provided and if so, over what time period. A "joint" response to the FIR was received from the council dated 2 December 2015. That response included in an appendix a copy of a report co-authored by Lothian Health and the council to the Edinburgh Integration joint board – dated 25 September 2015 - which confirms in para 3.3 that:

> *Service change to reduce reliance on Liberton Hospital is underway, with the transfer of stroke rehabilitation to create an integrated stroke unit at the Royal Infirmary of Edinburgh now complete. Redesign of day services and a focus on 'discharge to assess' in conjunction with actions to improve flow by Midlothian and East Lothian Partnerships is expected to allow the closure of a further ward in Liberton in October. The timeline for full closure of Liberton is early 2017.*

31. Firstly, I am satisfied that the response sent does represent the joint, up-to-date position from the council along with Lothian Health on these matters. Secondly, as the council points out the hospital site is in the ownership of NHS Lothian and "its release from operational use and disposal for redevelopment is a separate but related matter to the properties within the HSG 28 site immediately adjacent." Nevertheless the council states that "NHS Lothian has confirmed to the council that it still intends to dispose of the Liberton Hospital site within the period of the LDP (ie before 2026)". It then notes that there is a statutory consultation process to go through prior to disposal and whilst the

timetable for that is yet to be confirmed the potential date for this has been identified as 2017 – as set out in the report cited above.

32. Based on the available information, I conclude that a new access road across the Liberton Hospital site can be implemented to provide a direct road traffic access between Lasswade Road and the HSG 28 site within the period of the local plan. Accordingly, I conclude that there is insufficient reason to delete the proposed allocation provided that the plan is amended – in terms of the wording of the HSG 28 site brief and development principles. Those amendments would make clear, firstly, that individual and cumulative transport impacts would be assessed and addressed through appropriate mitigation and secondly, that mplementation of this allocation is strictly conditional upon a new direct access across the Liberton Hospital site being in place and available to serve the HSG 28 development prior to any houses on this allocated site being occupied.

Schools and other community faclities

33. A number of representations draw attention to the limitations on the schools capacity in the area to serve existing and projected demands – in some cases highlighting the need for a new school to address these problems. In response the council makes reference to its Revised Education Appraisal (June 2014) undertaken as part of the local development plan process. I note that in calculating the net impact of new housing proposals in South East Edinburgh, it has made an assessment for the Liberton and Gilmerton Contribution Zone which includes the HSG 28 site. That assessment assumed a particular ratio of flats:houses and pupil ratios for development of this site taking into consideration the nature of the site and its local context – including taking account of the most recent new development approved in the vicinity. In any event I note that the overall amount of housing development on this or indeed any site allocated in the proposed plan is indicative – and would only be finalised when a planning application is lodged and approved by the planning authority through the Development Management process.

34. The council accepts that proposed housing will add to significant rising rolls and the need for additional school space. It considers that a lead in period of 3 years would allow for the planned provision of the required school infrastructure. The council accepts a potentially significant funding gap between the required works and the anticipated level of developer contributions. However, it states that recognised financial constraints can be addressed through forward and gap funding.

35. I have no technical or expert evidence to dispute the confidence of the council, as education authority, that identified education impacts can be appropriately addressed. Consequently, I find no basis to conclude that these matters justify deletion of this site. However, this conclusion does not negate the emphasis that I consider should be placed on the appropriate and planned provision of this necessary infrastructure.

36. In this context, I consider the proposed plan lacks detail on how this constraint is to be addressed. I believe that such detail is required in order to give confidence to the local community and others that schools capacity issues would be addressed.

37. I have no reason or basis to challenge those assumptions made which led to the council's Action Programme for the local development plan presenting two 'Education Action' options for the Liberton and Gilmerton Contribution Zone. Both of those options set out specific initiatives for new or extended primary shools serving the catchment area, as well as appropriate extensions to increase the capacity of existing high school

provision in the area concerned to meet projected needs. It is also stated that further assessment will determine whether that enlargement is best undertaken at Gracemount or at Liberton High School.

38. The proposed mitigation applies to various sites in South-East Edinburgh. Through Issue 21 it is recommended that the various education actions for South-East Edinburgh are brought together in Part 1 Section 5 of the plan under the heading General Development Principles. My recommendations include a cross reference to these General Development principles within the site brief for this site. It is also important that these actions and the council's approach to timeous delivery are further clarified. This will require Supplementary Guidance to provide greater surety about the mechanisms, timing and funding of delivery. These matters are addressed through the conclusions and recommendations on Issue 21.

39. There are some representations expressing concerns about the possible adverse effects the proposed HSG 28 allocation might have on other community facilities and services, including health services and policing. I have no evidence to indicate that the proposal would have strategic implications in respect of policing of this or the wider area. I note, however, that the proposed plan acknowledges that new housing development has implications for primary healthcare as well as community health service provision. As the council points out, policy Hou 10 of the proposed plan aims to ensure that an appropriate range of healthcare and other community facilities are provided in association with new housing developments where this is practical. Whilst no specific actions on health provision or other community facilities and services have been identified in the Action Programme specifically related to the HSG 28 allocation I am satisfied that the council has given an undertaking to address these matters as and when projected needs are identified as not being adequately met by existing provision.

40. In summary, I conclude that the proposed plan pays due attention to the need for the provision of appropriate healthcare, as well as other community facilities and services to be met satisfactorily if the HSG 28 allocation was implemented. Accordingly, I conclude that the matters raised in representations with regard to these particular issues are not of themselves, individually or in combination, sufficient to delete the allocation HSG 28.

Flooding and drainage

41. I am satisfied that prior to being put forward for allocation for housing development in the proposed plan, the site HSG 28 was assessed in detail with regard to flood risk. The scope of this strategic assessment undertaken was set out in the council's response to the representations. The fluvial flood risk areas are summarised in the Environmental Report (2nd Revision) June 2014 Volume1 (page 21) and shown in more detail for the area concerned on page 52 of Volume 2. I note that the assessment in this case concluded that the site in question is not considered to be at particular risk of fluvial flooding and as elsewhere surface water risk is addressed through the incorporation of a sustainable urban drainage system – in accordance with the terms of policiy Des 6 of the proposed plan. I have seen no substantive evidence to the contrary on these matters or in respect of other any matters of potential concern relating to drainage, including sewerage treatment with regard to the site proposals. Accordingly, I conclude that there are no significant flood risk or drainage concerns affecting the site that would merit deletion of the HSG 28 allocation.

Built and natural heritage, building form and amenity

42. The Mount Alvernia building on the corner of Malbet Park and Lasswade Road is a listed property whose notable features include its garden boundary walls adjoining site HSG 28. I have seen no persuasive evidence to indicate that the prospect of residential development on the HSG 28 site would necessarily have significant adverse implications for this listed building and its setting. In any event I am satisified that the principle of safeguarding historic buildings and their settings is already included in the proposed new plan – firstly, through policy Env 3: Listed Building - Setting. Furthermore, elsewhere in the plan policy Des 4: Development Design – Impact on Setting makes specific reference to ensuring that such matters are taken fully into consideration when any development proposals are lodged as a planning application.

43. I also note that whilst most of the open area known as Stenhouse Market Gardens is earmarked for housing development as part of the HSG 28 allocation, the site brief Development Principles set out on page 66 of the proposed plan makes specific reference to the requirement for appropriate tree protection and retention where possible – to be informed by a tree survey. I am satisfied that this provides sufficient safeguards and conclude that whilst this area would no longer be an unmanaged habitat for local wildlife it has no overriding ecological value that would of itself justify deleting the allocation.

44. Some neighbouring residents have expressed concerns about losing their open views and having their residential amenity including privacy, daylight and sunlight unduly compromised if this site was developed. In response, I am not persuaded by these arguments as the basis for deleting the allocation - as there is no right to a view and I consider that there is insufficient evidence to indicate that those other amenity concerns cannot be satisfactorily addressed at the masterplanning and detailed design stages when the layout and building forms of any development proposals are finalised as part of a planning application and prior to any planning permission being granted.

45. I agree with the council's current view that the term "cottage flats" used in the Development Principles set out on page 66 of the proposed plan is not readily recognised or defined. Accordingly, I conclude that the word 'cottage' should be deleted from the second bullet point of the Site Brief when the plan is adopted.

Overall Conclusions

46. I conclude that there are insufficient reasons to delete the HSG 28 allocation. Neverthelss, solely for the traffic and related access and road safety reasons noted earlier, I also conclude that it would be premature for the HSG 28 site to be occupied as a housing development unless and until a new direct access onto Lasswade Road can be put in place. The available evidence indicates that this can be achieved once the Libertorn Hospital site ceases to be operational and its site is made available for redeveopment. I note that whilst there is no firm date commitment at present for closure of the hospital, the latest indication is that this is expected in 2017. Based on the available evidence I am satisfied that it is highly likely that the required new access arrangement to serve the HSG 28 site via a new direct link across the hospital site can be achieved within the plan period. Accordingly, I conclude that the site should remain allocated but that the plan should be amended as set out above – in terms of the wording of the site brief and development principles. This would make clear amongst other things that implementation of this allocation is strictly conditional upon such a new road being in place and available

to serve the HSG 28 development prior to any houses on this allocated site being occupied.

HSG 30 Moredunvale

47. The site concerned extends to 5 hectares and comprises a gently sloping large wedge of mostly grassed open space situated belween blocks of flats and houses to the east and west of it. The Development Principles for the site set out on page 67 of the new plan illustrate the proposal for approximately half of this site to be used for new housing development with the remainder – on the east side nearest to the high rise blocks of flats – to be retained as open space that would be improved in quality. It is against this background that I now consider the representations lodged, all of which seek either removal of the allocation or a change to its proposed form.

48. The concerns raised in support of the objections can be considered under a number of broad headings: site selection; transport infrastructure; schools provision and other community facilities; flooding and other drainage matters; other matters including amenity and subsidence. I consider each of these in turn below.

Site selection

49. The representations highlight widespread concerns about the resulting loss of open space if the proposed allocation is confirmed and implemented. More specifically many local residents are objecting because they perceive a number of adverse impacts arising from this proposal - notably in terms of loss of amenity and deterioration of public health of the local community, particularly for those living in the high rise flats fronting onto the site. They also express concerns about the proposed new housing development resulting in potential losses of daylight, sunlight and privacy for those living nearest to those new buildings. I am satisfied that this latter group of issues concern matters that can and should be addressed satisfactorily at the masterplanning and detailed design stages as part of the process of lodging and assessment of a planning application - and prior to any scheme being granted planning permission with appropriate planning conditions. This is part of the Development Management process aimed at ensuring that appropriate consideration is given to these amongst other material considerations.

50. I note that the Open Space Audit undertaken by the council in 2009 identified the HSG 30 site as a publicly accessible residential amenity space of only “fair” quality. My own site visits indicated that whilst these open areas are maintained to a reasonable standard they do not appear to be particularly well used. In any event I acknowledge that the open space is also valued by many of those making representations as a ‘passive’ visual amenity, by virtue of it offering an open ‘green’ outlook within the otherwise generally urban locality.

51. I note that at the Main Issues Report stage of the local development plan process the council made public its intention to explore the concept of identifying opportunities for new housing on council-owned open spaces alongside smaller but better quality areas of open space – and this received “qualified support” in community consultation feedback. It is in this context that the allocation proposed for site HSG 30 has emerged along with the set of Development Principles set out in the plan (on page 67). As stated earlier, this proposes approximately half of the site being being retained as public open space - and this is the part located nearest to the high rise flats to the east of it.

52. Nothwithstanding the concerns expressed in representations, I am persuaded that the form and concept of the HSG 30 allocation accords with the broad principles set out in government policy on these matters summarised in the Scottish Planning Policy 2014 (SPP). Under the heading "Maximising the benefits of green infrastructure" the SPP draws attention firstly to the aim of the National Planning Framework 3 to significantly enhance green infrastructure networks, particularly in and around cities and towns and to improve access to open space to build stronger, healthier communities - and it makes reference to improving the quality of places and spaces. The SPP reaffirms the principles of protecting and enhancing open spaces and their management as an integral component of successful places. In this context the SPP states that local development plans should protect open space identified in the open space audit and strategy as valuable and functional and capable of being brought into use to meet local needs.

53. It is evident that a sizeable proportion of the existing open space on this particular site would be lost if a housing allocation was made, as proposed by the council. Nevertheless I am satisfied that on balance this quantitative loss would be outweighed by the commitments being made by the council to ensure that the quality and usefulness of the still substantial open space areas being retained here would be significantly enhanced, to the overall benefit of the local community.

54. In particular, I note that two of the Development Principles for the HSG 30 site set out in the plan are "the opportunity to provide play space, allotments and growing spaces as green space improvements" as well as "the opportunity to create links to the wider green network. These echo principles set out in the SPP in paragraphs 227 and 228. The council in its response highlights other areas of open space in the vicinity of the site which are also to be upgraded or provided through the Open Space Strategy. I am satisfied that those measures, in combination with the HSG 30 site upgrading, would provide an improved range and quality of provision of open space and an enhanced usefulness of the available spaces for local residents to enjoy.

55. In summary, whilst I recognise the concerns about the amount of open space being proposed for redevelopment for housing, I conclude that in overall terms the principles being put forward through HSG 30 are soundly based in planning terms. Most importantly they provide a means of delivering a net benefit to the local and wider communities by offering an increased stock of housing alongside an improved, more attractive and useable network of open space provision to better serve the local community. I note that some representations endorse the principle of providing additional housing locally, even if they do not regard this as being appropriate on the site in question.

Transport Infrastructure

56. A number of people have expressed concerns that the proposed new housing would result in traffic problems on the local road network as well as associated road safety and parking issues.

57. For Moredunvale site specific actions indentified by the council include improvement to the local pedestrian and cycle network along with a new direct link to Mordunvale Road (T8) shown in the Second Proposed Action Programme updated in May 2015. Issue 19 references the need for further assessment to address matters raised in relation to the required transport infrastructure to support the development strategy overall. For sites in south-east Edinburgh recommendations through Issue 21 identify specific interventions

which may require cumulative contributions from a number of sites. These general development principles, as recommended for inclusion in Part 1 Section 5 of the plan for South-East Edinburgh, apply to all the sites included in this section of the plan but also reference the need for further assessment. Consequently, I am satisfied that these matters can be addressed through the master-plan and planning application stage when further detailed assessment to address commensurate mitigation of any individual and cumulative transport impacts would be required. Policy Tra x (Issue 19) and Del 1 (Issue 21) including its associated guidance apply the relevant policy framework in this respect.

58. I note that the developers of all relevant proposals would be required to make "appropriate" contributions in accordance with policies and guidance on these matters summarised in the plan. These matters are considered in more detail elsewhere in our report under Issues 19 and 21 and I rely on the conclusions and recommendations set out there. Based on the available evidence and within the framework set out in the plan including recommended modifications I have no reason to doubt that traffic generation associated with the new housing envisaged on the HSG 30 site, alongside the other housing proposed in the wider areas, can be satisfactorily accommodated. I am also satisfied that road safety and parking issues can be addressed through the Development Management process when the site master plan, detailed design and layout and related matters are investigated prior to any planning application being approved. Accordingly, I conclude that, based on the available eividence, there are no insurmountable road traffic related reasons to delete the proposed allocation.

Schools Infrastructure and other community faciities and services

59. Representations express concerns about the ability of local schools to cope with additional demands arising from new housing on the site, when they are already operating at or close to full capacity. The council, as part of the local development plan process undertook a Revised Education Appraisal in 2014 – the results of which were published in corrected form in September 2014. This identified the need for various improvements to existing schools provision to be addressed through the Proposed Action Programme. The council sets out in its response a list of school improvement/extension proposals and planned new schools provision at the primary and secondary levels in the area around Moredunvale – including reference to Broomhills, New Gilmerton South, Liberton and Gracemount. The full listing is set out on pages 24-27 of the Education Appraisal June 2014.

60. The council accepts that proposed housing will add to significant rising rolls and the need for additional school space. It considers that a lead in period of 3 years would allow for the planned provision of the required school infrastructure. The council accepts a potentially significant funding gap between the required works and the anticipated level of developer contributions. However, it states that recognised financial constraints can be addressed through forward and gap funding.

61. I have no technical or expert evidence to dispute the confidence of the council, as education authority, that identified education impacts can be appropriately addressed. Consequently, I find no basis to conclude that these matters justify deletion of this site. However, this conclusion does not negate the emphasis that I consider should be placed on the appropriate and planned provision of this necessary infrastructure.

62. In this context, I consider the proposed plan lacks detail on how this constraint is to be addressed. I believe that such detail is required in order to give confidence to the local

community and others that schools capacity issues will be addressed.

63. The proposed mitigation applies to various sites in South-East Edinburgh. Through issue 21 it is recommended that the various education actions for South-East Edinburgh are brought together in Part 1 Section 5 of the plan under the heading General Development Principles. My recommendation include a cross reference to these General Development principles within the site brief for this site. It is also important that these actions and the council's approach to timeous delivery are further clarified. This will require Supplementary Guidance to provide greater surety about the mechanisms, timing and funding of delivery. These matters are addressed through the conclusions and recommendations on Issue 21.

64. Some representations express concerns about possible adverse effects the proposed allocation might have on other community facilities and services, notably health services and dentistry. I note that the proposed plan acknowledges that new housing development has implications for primary healthcare as well as for community health service provision. As the council points out, policy Hou 10 of the proposed plan aims to ensure that an appropriate range of healthcare and other community facilities are provided in association with new housing developments where this is practical. Whilst no specific actions on health provision or other community facilities and services have been identified in the Action Programme specifically related to the HSG 30 allocation I am satisfied that the council has given an undertaking to address these matters as and when projected needs are identified that are not likely to be adequately met by existing provision.

Flooding and drainage

65. I am satisfied that prior to being put forward for allocation for housing development in the proposed plan, site HSG 30 was assessed in detail with regard to flood risk. The scope of the strategic assessment undertaken in this regard is summarised in the council's response. The fluvial flood risk areas are summarised in the Environmental Report (2nd Revision) June 2014 Volume1 (page 21) and shown in more detail for the area concerned on page 52 of Volume 2. I note that the assessment in this case concluded that the only part of the site in question that is considered to be at risk of fluvial flooding is the northern corner which is not identified for development (as illustrated on page 67 of the plan). However, to take a consistent approach where these matters have been raised by the Scottish Environment Protection Agency I consider flood risk and the need for assessment merits specific reference in the development principles for this site and this is reflected in my recommendations. As elsewhere, surface water risk is addressed through the incorporation of a sustainable urban drainage system – in accordance with the terms of policy Des 6. No substantive evidence to the contrary has been drawn to my attention on these matters or with regard to any matters of potential concern relating to sewerage treatment or drainage in respect of the site proposals.

Other issues

66. Whilst Sports Scotland raises the matter of sports pitch provision, I find that the council has explained satisfactorily why this is not directly relevant in the context of HSG 30. I note that this is consistent with the findings of the Open Space Audit 2009 and so conclude that there is no need for me to consider this particular matter further.

67. There have been suggesions made in representations that it would be more

appropriate to retain the existing level of open space at the HSG 30 site and promote new housing instead at the Edinburgh Bioquarter. I note that the council's approved Supplementary Guidance for the Edinburgh Bioquarter and SE Wedge Parkland does allow for a residential component as part of a mixed use development. Nevertheless in my opinion this is not a justifiable reason for ruling out any housing on the HSG 30 site. Whilst the topography of the part of the HSG 30 site identified for housing development has a pronounced slope I would not envisage this causing insurmountable problems in terms of its development potential. These and related matters would be addressed through a master plan in the context of policy Des 7 of the proposed plan which concerns layout, design and access for new developments.

68. Concerns have been also expressed with regard to ground conditions and possible contamination. I note that these and related matters are addressed in policy Env 22 of the new plan for all new developments. Furthermore the Development Principles set out for site HSG 30 in the new plan include a specific reference to the fact that in this case remediation work may be required to develop the site due to the history of coal and limestone mining in the area. Based on all of these considerations I conclude that these concerns individually and in combination do not justify deletion of the allocation HSG 30.

Overall Conclusions

69. For the reasons outlined above I conclude that there are insufficient reasons raised in the representations, individually or in combination, to merit deletion subject the proposed mitigation as referenced above.

HSG 31 Curriemuirend and GS10 Curriemuirend

70. The HSG 31 site is a public park (Curriemuirend Park) with a mix of open space and mature trees. Overall it extends to 6 hectares within a varied terrain that includes some steep, tree-lined slopes and other more level, open areas. The GS10 site at Clovenstone Drive is a large area of gently sloping public green space located immediately to the east of HSG 31 - and separated from it only by Wester Hailes Road.

71. Both of these sites are bounded to the north and south by existing residential areas and the western edge of HSG 31 abuts the A720 Edinburgh city by-pass. As detailed on page 69 of the proposed plan the council proposes to allocate housing and allotments on the Curriemuirend Park land and to improve the quality of the green space at GS10. The Development Principles for the sites are also set out on page 69, stating at the outset that this will require a comprehensive approach to include both sites – which is intended to ensure that the allotments and green space improvements are delivered. The principles also include the creation of an active street frontage along Wester Hailes Road where it forms the edge of site HSG 31 – as well as to make this section of road a more attractive and safe environment for pedestrians.

72. It is against this background that I now consider the representations lodged, all of which seek either removal of the HSG 31 allocation or changes to the proposed form of the combined proposals. The concerns raised in support of the objections lodged in representations can be grouped under a number of broad headings: site selection; transport infrastructure; schools provision and other community facilities; flooding and other drainage matters; and other matters and subsidence. I consider each of these in turn below.

Site selection

73. The representations highlight strong local concerns about the resulting loss of most of Curriemuirend Park if the HSG 31 allocation is confirmed and implemented. Based on my own site visit I appreciate that this is an established and reasonably well maintained parkland area with a variety of open spaces and mature tree belts interspersed with footways that link through to neighbouring residential areas. The park was not busy whilst I was there but I have no reason to doubt that it is valued by those in the area who do use it on a regular or occasional basis, as it offers an attractive landscape secluded from the busy roads and urban areas nearby. Accordingly, I recognise that a substantial reduction in its size would have adverse impacts on local amenity for the park users – although the overall 'package' put forward by the council seeks to ensure that this would be counter-balanced by the proposal to improve open space provision on the adjoining GS10 site.

74. Firstly, I am not persuaded by the contentions made by some objectors that these proposals would risk coalescence between the neighbouring community areas either side of the site. I am satisfied that this is not a major problem - and in any event I find that the land concerned is not designated as green belt. I note that the Open Space Audit undertaken by the council in 2009 identified the HSG 31 site as a publicly accessible community park of only "fair" quality and GS10 as an unclassified park with no particular 'quality' rating. In the 2010 Open Space Audit the Curriemuirend Park was identified for action to improve it to a "good" standard - to accord with local and large greenspace standards.

75. The council confirms that this park has been a priority for maintenance but points out that its potential to be a safe and pleasant place for recreation is constrained by its lack of natural surveillance. My own site visits confirmed this to be the case and I also noted that key accesses to the park from the neighbouring residential areas rely on the use of pedestrian underpasses. In principle such thoroughfares are perceived by sections of the community as neither welcoming nor safe and so many people avoid them – which is understandable. As the council points out, these constraints limiting the local take-up of the recreational opportunities of Curriemuirend Park arise from the original roads layout of this area and cannot be readily overcome. By contrast the GS10 park area is more overlooked, is generally more open and not surprisingly has well-used cross routes. In this context I recognise the logic of the council's argument that the GS10 area has more potential to benefit from investment as a park for the enjoyment and greater use by the surrounding communities. Nevertheless I note that the intention is for part of the Curriemuirend Park to be retained as a smaller greenspace, with new allotments all to be sited alongside the proposed new housing development earmarkd for the majority of the existing park land of HSG 31.

76. I note that at the Main Issues Report stage of the local development plan process the council made public its intention to explore the concept of identifying opportunities for new housing on council owned open spaces alongside smaller but better quality areas of open space - and this concept received "qualified support" in the feedback received. I understand tha it was in this context that the combined proposals for sites HSG 31 and GS10 emerged. Nothwithstanding the strength of the concerns expressed in representations, for the reasons outlined above I am persuaded that the form and concept of the HSG 31 and GS10 allocations set out in the plan - and articulated through the design principles on page 69 referred to earlier - accord with the broad principles set out in government policy on these matters summarised in the Scottish Planning Policy

2014 (SPP).

77. Under the heading "Maximising the benefits of green infrastructure" the SPP draws attention firstly to the aim of the National Planning Framework 3 to significantly enhance green infrastructure networks, particularly in and around cities and towns and to improve access to open space to build stronger, healthier communities - and it makes referenece to improving the quality of places and spaces. The SPP reaffirms the principles of protecting and enhancing open spaces and their management as an integral component of successful places. In this context the SPP states that local development plans should protect open space identified in the open space audit and strategy as valuable and functional and capable of being brought into use to meet local needs. In this particular case I am persuaded that whilst the majority of Curriemuirend Park would be lost this would be counterbalanced by the commitments being made by the council to ensure that the quality and usefulness of the remainder of that park alongside new open space initiatives to enhance site GS10 - resulting in an overall benefit of the local community.

78. In particular, I note that two of the key Development Principles for the HSG 31 site are "the opportunity to provide play space, allotments and growing spaces as green space improvements" as well as "the opportunity to create links to the wider green network. These echo principles set out in the SPP in paragraphs 227 and 228. The council, in its response ot the representations, highlights other areas of open space in the vicinity that are also to be upgraded or provided through the Open Space Strategy. In my opinion these, in combination with the HSG 31 and GS10 site proposals, should provide a better overall range and quality of provision of open space and an enhanced usefulness of the available spaces for local residents to enjoy. I share the view of the council that this could not be achieved by enhancement of the existing Curriemuirend Park because of the inherent constraints of its layout and access which cannot be readily overcome to make it a safer place that would attract more users.

79. In summary, whilst I understand the concerns about the amount of parkland space being proposed for housing, I conclude that in overall terms the underlying principles and development concept being put forward for these two adjoining sites (HSG 31 and GS10) are soundly based in planning terms. Most importantly, along with other open space upgrading proposals in the local area, I conclude that they provide a means of delivering a net benefit to the local and wider communities by offering an increased stock of housing alongside an improved, more attractive and usable network of open space provision to better serve the local community. I note that some representations endorse the principle of providing additional housing locally, even if they do not regard this as being appropriate on the HSG 31 site.

Transport Infrastructure

80. A number of representations express concerns that the proposed new housing here and on other sites in the surrounding area would exacerbate existing traffic problems on the local road network - as well as resulting in associated road safety issues.

81. Issue 19 references the need for further assessment to address matters raised in relation to the required transport infrastructure to support the development strategy overall. For sites in south-west Edinburgh recommendations through Issue 21 identify specific interventions which may require cumulative contributions from a number of sites. The Transport Appraisal carried out as part of the local development plan process identified improvements to transport infrastructure needed to address the net impact of

new housing proposals. Of direct relevance to site HSG 31 these actions include improvements to Gillespie Crossroads and Hermiston Park and Ride. I note that the council provides a detailed and reasoned response to the concerns expressed following a recent appeal decision that made reference to the Gillespie Crossroads.

82. The general development principles, as recommended for inclusion in Part 1 Section 5 of the plan for South-West Edinburgh, apply to all the sites included in this section of the plan but also reference the need for further assessment. Consequently, I am satisfied that these matters can be addressed through the master-plan and planning application stage when further detailed assessment to address commensurate mitigation of any individual and cumulative transport impacts would be required. Policy Tra x (Issue 19) and Del 1 (Issue 21) including its associated guidance apply the relevant policy framework in this respect.

83. The site specific Development Principles for the HSG 31 site make reference to the opportunity to reduce Wester Hailes Road to a single carriageway. Whilst I note the concerns expressed in representations about the logic and possible disbenefits of that, I am satisfied that these and related issues are matters that can and should be addressed satisfactorily at the masterplanning and detailed design stages as part of the process of lodging and assessment of a planning application. Accordingly, I am satisfied that any significant traffic generation and local circulation issues would be resolved prior to any scheme being granted planning permission with appropriate planning conditions. This is a standard part of the Development Management process which is aimed at ensuring that due attention is given to these amongst other material considerations. Whilst reference has been made to the safeguarding of the Currie by-pass in the Rural West Edinburgh Local Plan (Transport Safeguard T7) I note that the council regards this as no longer necessary nor appropriate in terms of the principles and priorities set out in the Local Transport Strategy and the LDP Transport Appraisal Addendum.

84. Based on the available evidence I have no reason or basis to doubt that traffic generation associated with the new housing proposed for the HSG 31 site, alongside the other housing proposed elsewhere in SW Edinburgh can be addressed within the policy context of the local development plan including the changes recommended through this examination. I am also satisfied that local road layout details, access arrangements, pedestrian and cycle routes, road safety and parking issues are all matters that can be addressed through the Development Management process when the site master plan, detailed design and layout and related matters are investigated prior to any planning application being approved. Accordingly, I conclude that based on the available evidence there are no insurmountable road traffic related reasons to delete the proposed combined allocation for sites HSG 31 and GS10.

Schools Infrastructure and other community faciities and services

85. Representations express concerns about the ability of local schools to cope with additional demands arising from new housing on the HSG 31 site, when they are perceived to be already operating at or close to full capacity. The council, as part of the local development plan process undertook a Revised Education Appraisal in 2014 – the results of which were published in corrected form in September 2014. This identified the need for various improvements to existing schools provision to be addressed through the Proposed Action Programme. The council sets out in its response above a list of school improvement proposals and new schools provision in the area around Curriemuirend, This is intended to address the projected needs and target specific capacity issues at the

primary and secondary schools serving the area arising from existing and planned housing developments in the local and wider areas.

86. Of particular relevance in this case is the fact that the HSG 31 site is located within the Currie High School catchment area where there is no spare capacity. The council has acknowledged this and addressed the matter by stating that it proposes to change the catchment boundaries to make the site in question within the catchment areas of Clovenstone Primar School and Wester Hailes Education Centre – noting that both of these schools have sufficient spare capacity to meet the projected education needs of families within the proposed new housing on site HSG 31.

87. The council accepts that proposed housing will add to significant rising rolls and the need for additional school space. It considers that a lead in period of 3 years would allow for the planned provision of the required school infrastructure. The council accepts a potentially significant funding gap between the required works and the anticipated level of developer contributions. However, it states that recognised financial constraints can be addressed through forward and gap funding.

88. I have no technical or expert evidence to dispute the confidence of the council, as education authority, that identified education impacts can be appropriately addressed. Consequently, I find no basis to conclude that these matters justify deletion of this site. However, this conclusion does not negate the emphasis that I consider should be placed on the appropriate and planned provision of this necessary infrastructure.

89. In this context, I consider the proposed plan lacks detail on how this constraint is to be addressed. I believe that such detail is required in order to give confidence to the local community and others that schools capacity issues will be addressed.

90. The proposed mitigation applies to various sites in South-West Edinburgh. Through issue 21 it is recommended that the various education actions are brought together in Part 1 Section 5 of the plan under the heading General Development Principles. My recommendation include a cross reference to these General Development principles within the site brief for this site. It is also important that these actions and the council's approach to timeous delivery are further clarified. This will require Supplementary Guidance to provide greater surety about the mechanisms, timing and funding of delivery. These matters are addressed through the conclusions and recommendations on Issue 21.

91. There are some representations expressing concerns about possible adverse effects the proposed allocation might have on other community facilities and services, in particular health services. I note that the proposed plan acknowledges that new housing development has implications for primary healthcare as well as community health service provision. As the council points out policy Hou 10 of the proposed plan aims to ensure that an appropriate range of healthcare and other community facilities are provided in association with new housing developments where this is practical. Whilst no specific actions on health provision or other community facilities and services have been identified in the Action Programme specifically related to the HSG 31 allocation I am satisfied that the council has given an undertaking to address these matters as and when it identifies projected needs that are not being adequately met by existing and committed additional provision.

92. Accordingly, I conclude that the matters raised in representations with regard to

these particular issues are not of themselves sufficient to delete the allocation HSG 31.

Other issues

93. I acknowledge the note confirming that the council, following the Capital Coalition Motion 14 May 2015, "sees merit" in the representations objecting to the housing proposals for site HSG 31. Nevertheless, the council has provided a reasoned justification for retaining this allocation and I find the arguments it has based this on are persuasive. Indeed, I conclude that they outweigh the concerns that have been highlighted in representations.

94. The council acknowledges that loss of woodland from the Curriemuirend Park arising from the proposals for HSG 31 would need to be offset in accordance with Scottish Government's Control of Woodland Removal Policy. I am satisfied that this could be achieved through a mix of actions including tree planting within the proposed new housing along with supplementary planting within the public open spaces in the surrounding area.

Overall Conclusions

95. For the reasons outlined above I conclude that the case for endorsing the HSG 31 allocation in combination with the GS10 proposals outweighs the arguments put forward for deletion of HSG 31. I reach this conclustion having taken into account all of the matters drawn to my attention and the detailed issues and concerns assessed earlier. I also rely on the findings and conclusions of Issue 5 of this report regarding the strategic housing needs assessment for the plan period together with the findings and conclusions of Issue 19 concerning transport issues. Finally, the council has acknowledged that it would be logical to make minor adjustments to the plan text to correctly reflect the name Clovenstone Drive for site GS10 – and I am also of the view that this would be beneficial.

Reporter's recommendations:

Modify the proposed plan as follows:

1. HSG 28 Ellen's Glen Road Site Brief Development Principles add or amend the bullet points as follows:

- Add a new first bullet point to state that no houses on the site to be occupied unless and until a direct vehicular access from Lasswade Road has been provided across the Liberton Hospital site
- Add the word 'additional' to what becomes the second bullet point (formerly the first bullet point) so that it would now read: "additional vehicular access to be taken from Ellen's Glen Road and Malbet Wynd
- New bullet point: Address the General Development Principles on transport and education for South-East Edinburgh (as set out in paragraphs 118-120).
- Remove the existing penultimate bullet point referring to direct vehicular access across the Liberton Hospital site and leave the wording of the last bullet point without the bullet. Accordingly the Development Principles ends with the sentence: If the site currently occupied by Liberton Hospital becomes available in future proposals would be expected to provide not only for a direct vehicular access from Lasswade Road to the HSG 28 site but also to ensure appropriate retention of

trees along Lasswade Road and elsewhere across the site as informed by a tree survey.
- Remove the word cottage from what becomes the fourth bullet point (formerly the second bullet point).

2. HSG 30 Moredunvale Development Principles add:

- Address the General Development Principles on transport and education for South-East Edinburgh (as set out in paragraphs 118-120)
- The finalised site capacity, design and layout should be informed by an adequate flood risk assessment.

3. HSG31 Curriemuirend Development Principles

- Address the General Development Principles on transport and education for South-West Edinburgh (as set out in paragraphs 123-125).

4. Change GS10 title to remove Curriemuirend and replace with Clovenstone Drive.

Issue 13 Appendix A - Ellen's Glen Road	
0019 Rosemary Howard	1993 PJ Murray
0234 Charles Cornelius	1995 G & L Clouston
0283 Heather Brookes	1996 Jolene Wallace
0332 Trish Murray	2161 Simon Blyth
0347 Linda Coombs	2179 David Anderson
0368 Una Coombs	2227 Suzanne Casey
0370 Malcolm Stewart	2229 Stuart Bell
0503 Ann Arthur	2289 George Christy
0533 Stacey Williamson	2494 Lisa Browning
0536 John Miller	2502 Neil Thomson
0669 William Goodbrand	2528 Gregory Youngs
0734 Ian Mack	2576 Alan Clark
0738 Alan Edgar	2663 Colin Aitken
1038 Elaine Smith	2670 Morag McKelvie
1260 Marjorie A White	2714 Susan Conway
1653 Ian Wilson	

Issue 13 Appendix B - HSG 30 Moredunvale

0097	Maureen Watson
0400	Simon Burton
0450	Anna Goldie
0465	Helen Metcalfe
0467	Helen Malcolm
0471	Jennifer Binnie
0559	Alan Sneddon
0588	Donald Macarthur
0648	Andrew Hall
0769	Alec Kennedy
0770	Isobel Kennedy
0771	John Millar
0773	Ray Wynn
0775	Susan Tully
0766	Jennifer Crawford
0768	A Mackenna
0987	Alexander Crow
0997	Sheila Crow
1002	Emma Moncrieff
1005	Joanna Crawford
1007	Teigha Robertson & Young
1008	Chloe Bang
1046	Abbie Reid
1056	Roy Pratt
1060	Sheila Wood
1160	Poppy Evans
1169	Cath Clarkson
1173	Brian Gray
1175	Annie Watson
1178	Robert Raiker
1179	Debbie Haldane
1182	Robert Lawson
1183	Alex Farquhar
1185	Zofia Wieczorek
1189	Susan Quinn
1193	Miriam Whiting
1195	Mrs Craig
1197	Stephanie Wood
1199	Linda Alexander
1200	Julie Devlin
1202	Rachel Lambe
1203	James Sutherland
1205	George Thomson
1206	Maria Juste
1208	Julie Gibson
1212	Sarah Wynn
1223	Lorraine Fagan
1224	Leonie Fagan
1225	Todor Karabunaruev
1233	Thomas Judge
1234	Donnie Johnston
1235	Zoe Angus
1236	Derek Leslie
1237	Kaily Mills
1239	Ashley Borthwick
1240	James Murray
1241	T Judge
1242	Gordon Johnston
1243	Tracy Ivy Johnston
1244	Fraser McLellan
1245	Duncan Stirling
1246	Julie Dunn
1247	Sue Tomlinson
1248	Robert Fitzpatrick
1278	Jamie Sutherland
1282	Sean O' Boyle
1284	Geoff Ward
1288	Donka Karabunarlieva
1290	RG Charles
1292	Desmond Fagan
1296	Mr & Mrs Boynes
1300	Nadine Reynolds
1302	Richard Livingstone
1304	James Tuff
1309	Angela Booth
1310	Joe Cameron
1312	Thomas Meharry
1314	Jackie Cruikshank
1315	D R Allan
1316	Gary Kerr
1317	Monique Stevenson
1318	William John Tomlinson
1319	J McEwan
1320	Derek Hamilton
1322	J Wotherspoon
1323	Kinnear
1325	Angela Shearer
1326	Keith McKenzie
1327	Chris Bain
1330	Stephen Millar
1331	Alison McKendry
1332	Alex Fey
1334	Donna McQueen
1335	Dale Alexander
1336	Scott Watson
1337	Joanne Finlay
1338	W Tully
1339	Kenny Paul M Todd

1227 Scott Robertson 1228 RF Gorman 1229 Neil Harvey 1230 Joe Richardson 1231 Janet Scotland 1232 Peter Shaw	1341 Jennifer Ewen 1343 Niel Hansen 1963 Anne Mulligan 2241 Stephnie Inglis 2486 Eileen Crow

Issue 13 Appendix C - HSG 31 Curriemuirend	
0009 Daniel Ferguson	1546 Pamela Coovert
0010 Grant Osinski	1547 Marcus Malison
0011 Fiona Osinski	1548 Alex Robinson
0012 Amy Dixon	1549 George Naylor
0013 Peter McConnon	1550 Elaine Merrilees
0014 Agnes McConnon	1551 Claire Monkman
0015 Dave Gradwell	1552 Micudel Gordon Connor
0016 David McBain	1553 Kevin Calder
0017 Leigh Aitchison	1555 Bryan Cameron
0018 Adam Dower	1556 Alex McFarlane
0021 Ian Seath	1557 Robert McGuilan
0022 June Browne	1558 Neil Muirhead
0025 Damien Watson	1559 Elaine Hill
0026 Paula Watson	1561 Arthur Hill
0027 Ruth Collins	1562 Katie Shepherd
0028 Kevin Rushton	1563 Mag Carson
0029 Hunter Fiona	1564 Peter Carson
0030 Hugh Boyle	1565 Gordon Macdonald
0031 Claire Paterson	1566 Paul Gunn
0032 Pratt Sharon	1567 Patrick Brown
0033 Andrew Tasker	1569 Gary McLeod
0034 Jane Robertson	1570 Cath Munro
0035 Sarah Wilson	1571 Morag Kerr
0036 Louise Bird	1572 Tom Watt
0037 Leigh Philip	1573 Norman Cumming
0038 Jennifer Thomas	1575 John Baird
0039 David Aitchison	1576 Celia Baird
0040 Eric Moonery	1577 Gerry Stovin
0041 Irene Mooney	1578 Patricia Muirhead
0042 John Charalambous	1579 Corina Stovin
0043 Jo Potter	1580 Tabitha Stovin
0044 Susan Ferguson	1581 John Munis
0047 Keith Rarity	1582 Lynsey Inglis
0048 David Andrew	1583 Leigh Dingsdale
0049 S Smith	1584 Ewan Drysdale
0050 Duncan Curr	1585 Elizabeth Muckersie
0051 Jeanette Campbell	1586 Chris Brown
0053 Steven Hunter	1587 Christine McColl
0055 George Urquhart	1588 Ingrid Butler
0059 Claire Shirsinger	1590 John Johnstone
0060 Ronald Crichton	1595 Steven Grubb
0062 Norma McGeever	1596 Eric Andrew
0063 Richard Heathwood	1597 Irene Barclay
0064 Lilian Wilson	1598 Diane Sedgwick
0068 Fiona Thorburn	1599 Will Golding
0069 Helena Mackay	1600 Kasia Banaszewska-Diaz
0070 George MacKay	1602 Eilidh Mears
0071 June Browne	1603 Elizabeth A Gilmour
0072 Charlene Taylor	1605 K McNaughton
	1607 A.S Paisley

0073 Paul Louden	1608 Judith Benton
0074 Jill Louden	1609 Anne Macnab
0075 Duncan Smithyman	1610 John Martin Johnston
0076 Rita Bennett	1611 Diane Johnston
0077 Clive Bennett	1613 Derek Moir
0078 Greg Paterson	1615 Claire McKenzie
0091 Margaret Gourlay	1616 Alison H Buchanan
0093 Gavin Dawson	1617 Robert Douglas Buchanan
0094 Susan Dawson	1618 Ross Pearson
0095 Matthew Dawson	1619 Mark Pearson
0096 Christopher Dawson	1620 Bernard Ramsay
0098 James Simpson	1621 Sheena Ramsay
0100 Robin Davey	1623 Marjorie Combe
0101 Evelyn Davey	1624 Marilyn Shepherd
0102 D Stewart	1625 Ed Maddox
0103 C Stewart	1626 Laura Ferguson
0106 William Burns	1628 Melissa Begg
0109 James Spence	1629 Gracie Johnston
0126 David McArdle	1630 William Johnston
0128 Elizabeth McArdle	1631 Helen Pearson
0137 Desmond Brady	1632 Kevin Kealy
0139 Frank Higgins	1633 Elaine Wilson
0148 Sheila Reid	1634 E Kecheran
0151 James McQue	1635 J Kecheran
0166 Beryl Moncrieff	1636 Stuart McVie
0167 Douglas Allan	1637 Alison McVie
0169 Anne Murray	1639 E.C Miller
0172 Douglas Bishop	1640 J Loch
0174 Lorna Thompson	1643 Moraig Cassels
0175 Alan Anderson	1644 Janet Stewart
0178 Phillip Thompson	1645 Christopher Scott-Jupp
0187 Julie Bianco	1647 Mary Paterson
0188 Dario Bianco	1648 Ruby Robb Adamson
0189 Jane Stewart	1649 M.I Macnamara
0198 Elaine Wilkinson	1650 Moira Young
0203 Scott Watson	1661 James Westwood
0204 Gordon Laing	1663 Linda Fital
0205 W Watson	1664 Wayne Enwood
206 Christine Laing	1665 Lauren McEwan
207 Peter Mack	1666 Erin Gorrie
208 Fiona Mack	1667 Caitlin Allordice
209 A. Cameron Grant	1668 Jamie Allordice
210 Kerstin Grant	1669 Paul Regan
214 Gillian Mackenzie	1670 Tracey Regan
215 Stephen Mackenzie	1671 Emma Cameron
216 Kenneth Ashurst	1672 Simmone Khanyal
217 Evelyn Ashurst	1673 Billy Elviene
218 Colin Ashurst	1674 Sarah O'Donnell
219 Margaret Forsyth	1677 Sarah J Bannerman
220 Robert Charles Forsyth	1678 Sophie A Bannerman
221 Jill Thomson	1680 Ben Love
222 Andrew Thomson	1682 Michele Stewart

235 Andrew Stewart	1684 Edward Gray
249 D.C Foggo	1685 Layla King
250 M.A Foggo	1686 Alison Gorrie
255 Jennifer Mallon	1690 Maureen McNeill
257 Alex Mallon	1692 David McNeill
258 Jean Barton	1693 Sam Enwood
259 James Brown	1694 Jean Clements
260 Kate Brown	1696 John Clements
262 Douglas Reid	1698 Kim Quigley
269 Ian Macphail	1699 David McEwan
276 Gabi Pouso	1700 Ayesha Quigley
278 Richard Owen	1701 Faye Henderson
279 Maurice Green	1702 Emma James
289 Stewart Mackinnon	1703 Sophie Smith
296 Joyce Sneddon	1704 John Paul Hannan
301 Robin Scott	1705 Laura Hannan
307 Catherine Dowds	1706 Sarah Ann Boyle
316 Gladys Morton	1707 Richard Pringle
320 Alexander Valentine	1708 Celia Boyle
327 Douglas Marr	1709 Kathryn Drinnan
336 Tim Lear	1710 Shona Pennock
351 Connie Trail	1711 Claire Miller
352 Derek Trail	1712 Jennifer Miller
356 Margaret Tracey-Bower	1713 Thomas Smith
365 Angela Loftus	1714 Sean Hanley
370 Malcolm Stewart	1715 Hannah Newall
379 A Robertson	1716 Ross Darling
383 Robert Hodge	1717 Gordon McKenzie
387 Brian Findlay	1718 Chris Ross
392 George Taylor	1719 Mary Ross
393 Alisdair Taylor	1720 Karine Pearson
395 Sue Hamilton	1721 Ian Henderson
399 Mary McLeod Hodge	1722 Mary McKerrow
405 Joan Proudfoot	1723 James Kennedy
417 Sonja Smith	1724 Ellen Sherlow
418 John Smith	1725 Gordon Brown
422 Karen Andrew	1728 Shaun Miller
429 Margaret Fenelon	1762 S. Charles Morrison
461 Jennie Hulse	1775 Gavin Mears
466 James Douglas	1776 Alan Logan
469 Peter Wilson	1779 Hazel Tyrie
497 Douglas Hamilton	1780 Astrid Bunne
516 Jon Wilson	1781 Kirsty McBirnie
518 Alan Wilkie	1782 Martin Tyrie
527 Caroline Milne	1788 Sean Robertson
529 Jane Dickson	1791 Mark Kane
530 J Macdonald	1792 Jill Kane
545 Kenneth Rankin	1795 Stella Robertson
546 Paul Hulse	1796 Darren King
560 John Lumsden	1797 Graeme Kerr
562 Shauna Dickson	1798 Ian Rollo
563 Kenneth Dickson	1799 Christine Crighton

566 Helen Lumsden	1801 Ross Crighton
575 Robert Renton	1802 Lauren Kane
578 Mary Aitken	1803 Kayleigh Kane
605 Andrena Crawford	1804 Colin Dorward
606 Arthur Crawford	1805 Jenny Muir
607 Hugh Parker	1806 Joyce Hobson
661 Norma Kerr	1807 Emma Murdoch
663 George Leslie Kerr	1808 Iain Murdoch
664 Kathryn Kerr	1809 Chris Kerr-Milroy
666 Patricia Kerr	1810 Sheryl McArthur
699 I B Aitken	1811 Kerry Middlemass
720 Rachel Souter	1812 Andrea Rollo
721 Jean Ann Forster	1813 David Mack
722 Paul Bullen	1814 Fiona MacDonald
723 Eileen Scott	1815 James Stead
725 Kimberley Campbell	1816 Wilma Mack
726 Walter Robertson	1817 Gary McArthur
727 Nicholas Ferguson	1818 Dalvina Kerr-McIlroy
733 Mark Galloway	1820 Diana Fakhoury
818 Sabine Kubangel	1821 E Wilson
820 Maree Bell	1822 Sheila Stuart
821 Grant Cameron	1823 Gordon Stuart
823 Catherine Cameron	1824 Lindsay Wilson
824 JD Cameron	1826 Elizabeth Berry
827 Laura Quinn	1827 Alasdair Swan
832 Heledd Mai Rheinallt	1830 Amy Gorrie
833 Roseann Ferguson	1831 Joanne Gorrie
834 Iain Bell	1832 Sarah Gorrie
835 Eric Paulin	1833 Kiera Quigley
837 Gordon Campbell	1834 Kenny Sime
839 Karen Bery	1835 Caroline Sime
840 Kenneth Hunter	1836 Owen Sime
842 Yvonne Hunter	1837 Wendy McEwan
843 Sandra Paulin	1838 Joseph Quigley
844 Colin Stewart	1839 Chris McEwan
845 Anne Wimberley	1840 Julie Innes
846 Graeme McDougall	1841 Matthew McCloud
849 Sam Denis	1842 Claire Anderson
850 Jon Denis	1843 Stuart Don
853 Jennifer Stead	1844 Brett Halley
854 Harris Wilson	1845 Grant Rutherford
855 Isla Wilson	1846 Kathryn Toon
856 Hannah Wilson	1847 James Simms
857 Grant Wilson	1848 Debbie Lonsdale
859 May Reid	1850 Cheryl Lonsdale
860 Jan Beevers	1851 Margaret Quigley
861 Lorraine Henderson	1853 Scott Frew
862 Usman Shah	1854 Kat Frew
863 Shona Sandison	1855 Michael Quigley
864 Alastair Souter	1856 Julie Allardice
865 Nadine Robb	1857 Kate Allardice
866 Leigh Swan	1858 Thomas Allardice

867 Gill Muckersie
868 Shipra Kohli
869 Anne Goldie
870 Katie Adam
871 Steven Adam
872 Cecilia Buell
873 Eric Hope
874 I Colquhoun
875 Hugh Colquhoun
876 Richard Watt
877 John McBain
880 Michael Livingstone
881 Louise Graham
882 James Smith Tillbrook
883 John Tripp
884 Donna Michelle Cook Tillbrook
885 Brigitte Thomas
886 Sheila McDougall
887 Paul Watt
888 Donald W McLaren
889 Agnes Drew
890 William Hamilton
892 Elaine Smith
893 Mairi Haddow
894 David Kinmond
895 Lesley Brown
896 Emma Forrester
897 Joan Walker
898 Lorna Broadhurst
900 Cathy Cooney
902 Rab Hallett
903 Julie Watt
929 Rhoda Hornig
934 Gladys Notman
935 Jessie McMahon
937 Harry Simpson
979 Ken Sandilands
985 Isabella Howes
989 Mairi Fenelon
993 Kevin Fenelon
1021 E.J Harkness
1025 R.A Harkness
1030 Ann Stephen
1034 Kenneth Stephen
1043 Michael Fenelon
1055 Gavin Davies
1062 Susan Chalmers
1066 Jim Ferguson
1067 Emily Davies
1069 Marjorie Davies
1070 Kenneth Davies
1076 George Marple

1859 Lauren Campbell
1860 Jules Quigley
1861 Jake Quigley
1862 Phil Henderson
1863 Patricia Henderson
1864 David Stevenson
1865 Rita Forbes
1866 Jake Stevenson
1867 Chelsea Stevenson
1868 Karen Stevenson
1870 Adam Forbes
1871 Ian Graham
1872 Lauren Marshall
1873 Liz Gordon
1874 Scott Robertson
1875 Nick Wise
1876 Lean MacIntosh
1877 Gordon MacIntosh
1878 Stan Fital
1879 Shirley McIntosh
1880 Emily Lightfoot
1881 Steve Lightfoot
1882 Susan Lightfoot
1883 Alison Fital
1884 Kori Fital
1885 Joshua Fital
1886 Antoni Fital
1887 Niki Robertson
1888 Morgan Robertson
1889 Kaylee Rose
1890 Conrad Cornie
1891 Dean Blomfield
1892 Rachel Bell
1893 Billy Campbell
1896 John Barron
1898 Angela McIlhone
1899 Arthur Wilson
1900 Margaret Doull
1902 Ian McKerrow
1903 Samir Saga
1904 Derek Wheldon
1905 Catherine Marshall
1906 James Marshall
1907 Philip Shinton
1909 Dorothy Baird
1910 Nicola Newton
1911 Caroline Miller
1912 Lawrie Douglas
1913 Sheila Dudgeon
1914 Anita Shanley
1916 Siobhan Stewart
1917 Carolyn Tabb

1085 Emma Marple	1918 Ian Bruce
1087 Carole Marple	1919 Christine Bruce
1101 Alison Lyon	1920 Craig Bruce
1102 George Gill	1922 Irene MacKay
1107 Patricia Gill	1923 Lorraine MacKay
1116 Sandra Cunningham	1924 Heather McNab
1126 Colin Arthur	1925 Bryan Berry
1150 Bill Henderson	1926 Susan Lyndsay
1152 Lorna Henderson	1927 Colin Johnston
1153 Janet Johnston	1928 Madge Mcintosh
1156 Alan Johnston	1930 Christine Wilkinson
1157 John Henderson	1931 Chris Marshall
1158 Alison Henderson	1932 S Sonohue
1170 A.J.C. Clark	1933 Chris Saddler
1210 H Innes	1934 David Nelson
1211 Alison McEwan	1935 Nick Cornhill
1214 Gordon Miller	1936 Paul Wilson
1215 S Noakes	1937 Linda Galloway
1216 Hazel Barron	1938 Helen Cowles
1218 Lynne Brown	1939 Mark Benaicha
1219 June Henderson	1940 Cimeon Benaicha
1279 V W Stewart	1941 Alistair Morrice
1280 Craig Nolan	1942 Beatrice Morrice
1281 Claire Sloan	1943 Caroline Milne
1283 Helena Nolan	1944 Douglas Thomson
1285 Ronald Nolan	1945 Kenny Galloway
1286 Daniel Malcolm	1947 George McNab
1287 Eilidh Nolan	1948 Rachel Barron
1291 Cathy Jess	1949 Kenneth Barron
1293 E Lang	1950 Richard Barron
1294 Jillian Macaulay	1951 Kirsty Barron
1295 A Preston	1952 Jacqueline Nointon
1297 Connie Di Rollo	1953 Nancy Tonner
1298 J Summers	1962 Laura Morrison
1299 Wilma Summers	1978 Graeme Robb
1301 John Sutherland	1987 Alasdair Anderson
1303 R Sutherland	1990 Cathy Summers
1305 John Ward	1991 Daryl Summers
1307 Maureen Heathwood	1999 Linda Campbell
1311 Emma Clark	2005 Keith Bain
1313 M Watson	2011 Peter Tuffy
1350 Alan Campbell	2017 Doris Waterson
1353 Frances Scougall	2023 Jacqui Herbert
1354 Georgina Suckling	2024 Owen Rafferty
1415 Donald Clark	2038 Barry Neilson
1418 Rivan Buell	2049 Sarah McFarlane
1428 Inez Paisley	2090 Innes McFarlane
1430 Rodric Leslie	2091 Denis Wight
1433 Sally Leslie	2097 Andrew Dalgleish
1436 S Amery-Behr	2100 Jeremy Nicoll
1438 John Mears	2102 Allan Rhynas
1439 Joyce Mears	2103 Margaret Rhynas

1440 Aonghas McIntosh	2106 J Dewar
1441 Dee McIntosh	2109 Margaret Deans
1443 Graeme Thomson	2112 S Walker
1450 Alisdair Muckersie	2121 Joyce Gilmartin
1452 Irene Louden	2123 J Dewar
1454 Linda Louden	2129 Stewart Dredge
1456 Lorna Gow	2134 G Hales
1457 Eric Laing	2139 Russell Salton
1458 John Horne	2171 Laura Cargill
1459 Rena Young	2183 Ewing Grainger
1460 Audrey Johnston	2202 Alan Johnston
1461 Sylvia Cunningham	2233 E Beevers
1462 Alison Clark	2237 Cliff Beevers
1464 Gavin Skinner	2240 Teresa Martin
1466 James McIntosh	2253 Michael Martin
1468 Jean McIntosh	2254 N Murphy
1469 Marc Summers	2255 K Murphy
1470 Andrew Ross	2261 Peter Dawson
1471 Louise Coventry	2262 Barry Struthers
1472 Gayle Robertson	2263 Victoria Struthers
1473 Lesley Hind	2286 Helen Main
1474 Susan Ireland	2318 Arthur Howes
1475 Kevin Higgins	2329 Helen Ogg
1476 Jolon Dixon	2332 Ewan Struthers
1477 Emma Saunders	2345 L John
1478 Lindsay Cockburn	2349 Neil Struthers
1479 Stephanie McLaren	2355 Colin McFarlane
1492 Richard Mitchell Henderson	2356 Charlie Struthers
1507 Jacqueline McCafferty	2360 Douglas Forsyth
1508 Daniel O'Donnell	2363 J Corglone
1509 Anne O'Donnell	2364 Andy Stewart
1510 Connor Johnston	2374 Rosalind Salton
1511 Bobbie Ainslie	2379 P John
1512 Karen Hill	2439 Michael Gilmartin
1513 Barry Hill	2441 Elayne Gilmartin
1514 Peter Hay	2442 P Cooper
1515 Marc Wilson	2452 Fiona Struthers
1516 William McCathie	2455 W Cooper
1517 J McCathie	2466 Kristina Vysotskaja
1519 Michael Haldane	2469 Andrew Naylor
1520 Findlay Elder	2487 John Nicolson
1521 Jean Elder	2509 Michael J Gilmartin
1522 K Morrison	2511 Fiona Gilmartin
1524 S Dignan	2513 V Walker
1525 W Morrison	2519 Thelma Ingram
1528 M Davie	2520 Christine Struthers
1529 Scott Robertson	2573 Ryan Mcwilliam
1530 Gordon Ross	2578 Keri Lobban
1531 Norma Ross	2579 William Lobban
1533 J Dignan	2587 Elizabeth Lobban
1534 John Gow	2588 Jacqueline Lobban
1536 H Shaw	2591 Stephanie Russell

1537 Valerie Gow	2601 Janet Russell
1538 Seren Vickers	2610 Marie Robertson
1539 Annika Nordstrom	2626 Jack Millar
1540 Brian Fulton	2638 Joyce Clingan
1541 Kerstin Nordstrom	2643 Caroline Ritchie
1542 Mairi Ovenston	2653 Barbara Badger
1543 Linda Russell	2656 William John Moffat Hume
1544 Anna Farley	2667 Fraser Mackay
1545 Michael Allan	2668 Louise Mackay

Issue 13 Appendix D - HSG 31 Curriemuirend and GS10

0269	Ian Macphail
0858	Judith Hill
1520	Findlay Elder
1521	Jean Elder
1522	K Morrison
1525	W Morrison
1528	M Davie
1536	H Shaw
1539	Annika Nordstrom
1540	Brian Fulton
1546	Pamela Coovert
1548	Alex Robinson
1550	Elaine Merrilees
1582	Lynsey Inglis
1584	Ewan Drysdale
1602	Eilidh Mears
1603	Elizabeth A Gilmour
1604	Marcus Manson
1605	K McNaughton
1606	S Charles Morrison
1607	A.S Paisley
1608	Judith Benton
1609	Anne Macnab
1610	John Martin Johnston
1611	Diane Johnston
1613	Derek Moir
1615	Claire McKenzie
1616	Alison H Buchanan
1617	Robert Douglas Buchanan
1618	Ross Pearson
1619	Mark Pearson
1620	Bernard Ramsay
1621	Sheena Ramsay
1623	Marjorie Combe
1624	Marilyn Shepherd
1625	Ed Maddox
1626	Laura Ferguson
1628	Melissa Begg
1629	Gracie Johnston
1630	William Johnston
1631	Helen Pearson
1632	Kevin Kealy
1633	Elaine Wilson
1634	E Kecheran
1635	J Kecheran
1636	Stuart McVie
1637	Alison McVie
1639	E.C Miller
1640	J Loch
1641	M Heigh
1643	Moraig Cassels
1644	Janet Stewart
1645	Christopher Scott-Jupp
1647	Mary Paterson
1648	Ruby Robb Adamson
1649	M I MacNamara
1650	Moira Young
2459	Neil Ingram

Issue 14	**Suggested Housing Sites Outwith the Urban Area – West and South East Strategic Development Areas**	
Development plan reference:	**Table 4 pages 25 – 27** **Proposals Map**	**Reporter:** Allison Coard

Body or person(s) submitting a representation raising the issue (including reference number):

0131 Iain & Alison Macleod	2088 Scottish Government
0225 Cramond & Barnton Community Council	2168 Yvonne Tuffy
0244 Tony Gray	2246 Mactaggart & Mickel Homes
0324 Ross Lennen	2265 Springfield Properties
0326 Louisa Lennen	2275 Murray Estates
0328 Ian Lennen	2279 Hallam Land Management Ltd
0330 Jeff Deherdt	2281 Wallace Land Investment and Management
0331 Lynne Deherdt	2334 Paul and Sally Rutkowski
0651 M Allen & P Scott	2408 HolderPlanning
0755 BDW Trading Ltd	2421 SEEDco
1202 Land Options East	2480 Rosebery Estates Partnership
1921 Derek Cran	2584 Sally Mair
1998 Bruce Finday Mair	2649 Carina Dahlstrom
2006 Liberton and District Community Council	2717 Ruth Davies

Provision of the development plan to which the issue relates:	Suggested Housing Sites Outwith the Urban Area – West and South East Strategic Development Areas not allocated for housing, which are being promoted by developers and landowners in their representations.

Planning authority's summary of the representation(s):

CONTEXT

Most of these housing sites were the subject of representations to the first Proposed Plan. Part of the Drum was the subject of a question to the Main Issues Report (Question 3 seeking opinion on whether to exclude settlements and major uses from the green belt).

WEST EDINBURGH

<u>Edinburgh Garden District - East of Millburn Tower</u>

- Suggests the allocation of Edinburgh Garden District for mixed use development. Considers the site to lie within the Strategic Development Area, be well located for public transport, have potential for clear defensible green belt boundaries, is well integrated with employment and retail centres and has limited visual impact.

  Suggests also the allocation of land at East of Milburn Tower for housing. Considers that the site provides good accessibility to public transport and opportunities for the enhancement of public transport. States that the land can be well served by infrastructure through agreement. The site integrates well with employment and retail centres. States that due to the low lying and constrained

nature of the land, views to the site are limited and do not impact upon views of prominent features. Suggests that the site offers clear and defensible green belt boundaries. **(2275 Murray Estates)**

- States that East of Milburn Tower is appropriate for housing as it is within the Strategic Development Area so has better infrastructure than Cammo (HSG20), is well served by public transport, can create a defensible green belt boundary, is well integrated with the adjoining employment land and will relieve housing pressure and congestion. The site is a sustainable expansion of the city and superior to Cammo (HSG20). **(0225 Cramond & Barnton Community Council; 0244 Tony Gray; 0324 Ross Lennen; 0326 Louisa Lennen; 0328 Ian Lennen; 0330 Jeff Deherdt; 0331 Lynne Deherdt; 0651 M Allen & P Scott; 2168 Yvonne Tuffy; 2717 R Davies)**
- Science and Advice for Scottish Agriculture (SASA), a division of the Scottish Government, support the retention of the land adjacent to the experimental farm and laboratory facilities at Gogarbank Farm within the green belt. This includes land to the east of Milburn Tower. **(2088 Scottish Government)**

East of Ratho Station

- Suggests the allocation of land at East of Ratho Station for housing as this land forms a small part of the land safegaurded for the relocation of the Royal Highland Showground and is not required. States that the pending withdrawal of the West Edinburgh Planning Framework and the postponement of the relocation of the Showground to 2030 are not reasons for discounting the allocation of this site. The abandoned M8 link to the airport will reduce the capacity requirement of the safeguarded area, allowing the development of the land at East of Ratho for housing. This site should be added to Table 4 New Housing Proposals. **(2275 Murray Estates)**

Turnhouse Golf Course

- Suggest that additional land should be removed from the green belt and allocated as part of HSG 19 Maybury. The land should be increased from 75ha to 80ha to meet the requirement for increased housing numbers. It is stated that taking into account the site brief, gas pipeline, noise attenuation and topography, the developable area of HSG 19 would be reduced to 56ha, resulting in a shortfall of housing in relation to the Council's estimated capacity. It is stated that site 1 at Lennie Cottages would not have an impact on landscape quality and the site does not significantly contribute to green belt objectives. It is stated that site 2 at Turnhouse Farm Road is a logical extension of the proposed site HSG19 and the site is bounded by identifiable features which could create a defensible green belt boundary. **(2480 Rosebery Estates Partnership)**

SOUTH EAST EDINBURGH

South of Frogston Road East

- Suggests the land at Frogston Road East be included within the housing sites included in South East Edinburgh on the Spatial Strategy Summary Map (Figure 1 of the Plan), and Table 4 of the Plan. States that the additional housing site will be required in addition to that contained within the Plan and the land at Frogston Road East as a readily deliverable housing site (Issue 5), with a capacity of 140-

190 units, which accords with the spatial strategy. The site forms a small element of the wider landscape being separated visually by the overhead pylon line. The site is not clearly visible from the City Bypass and views from the Pentlands would not be affected with new structural planting north-east of the pylon line forming a new defensible boundary. A provisional brief is provided in support of the site. States that the site accords with the criteria set out in SDP Policy 7 in terms of integrating with existing local character, not undermining green belt objectives and being able to fund infrastructure improvements. **(0755 BDW Trading Ltd)**

South of Liberton Drive

- Suggests the land at Liberton Drive should be removed from the green belt and allocated as a Housing Development Site in Table 4 with a capacity of 70 units. It is stated that the site will make a significant contribution towards meeting the overall housing land requirement. States that the site will be visually contained and can be serviced by a choice of modes of transport. It is stated that the site can be developed in accordance with the Housing Site Assessment Criteria. The landscape appraisal submitted in support of the application states the existing woodland provides a robust edge to the green belt, views to listed building are protected, the development is restricted and the frontage improved. **(1202 Land Options East)**
- Support the continued designation of land 'South of Liberton Drive' as green belt and Special Landscape Area and Local Nature Conservation Site. **(1998 Bruce Finday Mair; 2584 Sally Mair; 2649 Carina Dahlstrom; 2334 Paul and Sally Rutkowski; 1921 Derek Cran; 1998 Bruce Findlay Mair)**

West of Liberton Brae

- Suggests that the land to the West of Liberton Brae and to the North of Liberton Drive should be identified as residential development and removed from the green belt. The representation restates the position that the sites can be developed sensitively and can contribute to the housing land supply to 2019. Make reference also to the Strategic Development Areas (Issue 1). **(2246 Mactaggart & Mickel Homes)**
- Support the continued designation of the land 'West of Liberton Brae', as green belt and Special Landscape Area and Local Nature Conservation Site. Resistance to additional housing development and support for the use for the enjoyment of residents. Support the continued designation of the 'Infill land near Liberton Tower' as green belt and Special Landscape Area and Local Nature Conservation Site. **(0131 Iain & Alison Macleod; 2006 Liberton and District Community Council; 2334 Paul and Sally Rutkowski; 1921 Derek Cran; 1998 Bruce Finday Mair; 2584 Sally Mair; 2649 Carina Dahlstrom)**

East of Burdiehouse Road

- To compensate for reduced capacity at HSG 22 Burdiehouse, due to topographical constraints and uncertainty regarding the achievability of allocations, this site should be added. Burdiehosue Extension site (HSG 22a) is a natural expansion of the current housing allocations in the area providing sustainable accessibility options and vehicular connections to the surrounding strategic road network in line with transport planning policy. Lang Loan would provide a new green belt boundary. The site has an indicative capacity of 100 – 120 residential units. **(2279**

Hallam Land Management Ltd)

North of Lang Loan

- Suggests that the site at Lang Loan is effective, can fund developer contributions to augment infrastructure, and all 220 houses can be built during the period to 2019. A Development Framework Report is submitted to guide future development. **(2281 Wallace Land Investment and Management)**

North of Gilmerton Station Road

- Seeks that proposal HSG 24 be extended west to include additional land at South Gilmerton to accomodate at least 600-650 residental units. Supports in part the allocation of HSG 24. However, the proposed 350-490, 6ha of public space, primary school and 50m landscape buffer cannot be provided within the boundary indicated in the Plan. The current proposed south western boundary is not the most appropriate boundary. The ridge to the west of the site is more appropriate. This is more defensible and would contribute additional houses to the land supply. Raise concerns as to the delivery of the primary school and seeks confirmation of the delivery mechanism. **(2246 Mactaggart & Mickel Homes)**
- Suggests that the site north of Lasswade Road is effective, can fund developer contributions to augment infrastructure, and all 160 houses can be built during the period to 2019. The proposal also includes 2.9ha of open space. A Development Framework Report is submitted to guide future development. **(2281 Wallace Land Investment and Management)**

Drum (North and South)

- It is suggested that the Drum (North and South) should be allocated for housing and associated development. An alternative is suggested that the Drum North be allocated for housing. It is suggested that the land could be developed without an unacceptable impact upon the Proposed Special Landscape Area and the Designed Landscape. It is stated that a masterplanned development, incorporating landscaping, can mitigate the visual impact of development. The peripheral areas within the Drum, at the eastern boundary of the Designed Landscape do not appear to have been assessed in the Environmental Report. The views into the Drum South are ordinary, restricted and of low importance. In terms of landscape mitigation and views this site is as suitable as the site at Gilmerton.

  The assessment of accessibility using PTAL is inconsistent with SDP and does not allow walking and cycling to be considered. It is not clear how planned improvements and opportunities for improvements to public transport are assessed. Stated that the PTAL assessment is flawed as it does not account for bus stops outwith the City of Edinburgh boundary. It is stated that the Drum site currently has good accessibility and this can be improved. It is stated that the relationship of the land to its surroundings and its accessibility is no different from the proposed sites at HSG25 and HSG 24.

  The supporting masterplan demonstrated how the site could create significant recreational parkland within the site respecting the Designed Landscape. It is stated that the Drum (North) can meet the criteria set in the Environmental Report Volume 2. It is stated that undergrounding the power lines would enhance the

landscape; a new link road between the A772 and the A7 would improve the road network and create a defensible green belt boundary. **(2421 SEEDco)**

South East Wedge (North)

- Suggested that the South East Wedge Parkland boundary, green belt boundary and Special Landscape Area should be realigned to exclude the Wisp (North) and allocate the site for housing in Table 4 of the Plan, with a capacity of 70 units. It is stated that the site will be in keeping with the character of the settlement and local area, can be developed in accordance with SDP Policy 12 and any additional infrastructure can be funded by the development. It is stated that the development, and review of the green belt boundary, would accord with Scottish Planning Policy paragraph 50 and 51. It is stated that the site is in a preferred location, has excellent accessibility and offers the opportunity to create a distinct identity. Development will create an attractive green space and connections between the 'South Woods' and Hunter's Hall Park. It is stated that the development of the small site would not adversely impact upon the delivery of a strategic greenspace network. It is stated that the land is 'effective' as defined in PAN 2/2010. **(2265 Springfield Properties)**
- Suggested that the South East Wedge Parkland Greenspace Proposal and green belt boundary should be amended to exclude land at The Wisp (South). The site should be allocated for housing in Table 4 of the Plan with a capacity of 250 units. The site represents a small element of the overall Green Space Proposal (GS4) and makes no substantive contribution to the parkland. The areas excellent accessibility, and ability to connect to walking and cycle networks, should be recognised. The surrounding road network has capacity to accommodate the development**.(2265 Springfield Properties**) *Note: added as an update by the council during the examination at the request of Springfield Properties.*

South East Wedge (South)

- Suggested that the South East Wedge boundary and green belt boundary should be amended to exclude this site. The land should be allocated for housing with a capacity of 400 units. The site is located within the Strategic Development Area and a preferred location. The site has historic mining which can result in instability and require up to £10,000,000 to resolve, thereby preventing its realistic use as parkland. It is suggested that the allocation of part of the site for housing would resolve the issue of stablising the land. It is stated that the site is well served by public transport and accessible, there is adequate capacity in the road network and the site is an effective sustainable urban expansion. It is stated that the site is brownfield by virtue of having historic mine workings. **(2408 HolderPlanning)**

Modifications sought by those submitting representations:

WEST EDINBURGH

Edinburgh Garden District - East of Millburn Tower

- Suggests the allocation of the Edinburgh Garden District and land at East of Milburn Tower for housing. **(2275 Murray Estates)**
- Add East of Milburn Tower to Table 3: Housing Proposals and West Edinburgh

Strategic Development Area and remove Cammo (HSG 20) from the Plan. **(0225 Cramond & Barnton Community Council; 0244 Tony Gray; 0324 Ross Lennen; 0326 Louisa Lennen; 0328 Ian Lennen; 0330 Jeff Deherdt; 0331 Lynne Deherdt; 0651 M Allen & P Scott; 2168 Yvonne Tuffy; 2717 R Davies)**

East of Ratho Station

- Suggests the removal of land at East of Ratho Station from Policy Emp 5 Royal Highland Centre and allocation for housing. **(2275 Murray Estates)**

Turnhouse Golf Course

- Suggest that additional land at Turnhouse Golf Course should be removed from the green belt and allocated as part of HSG 19 Maybury. The Proposals Map, Site Brief, Table 4 and Figure 13 should be amended accordingly. **(2480 Rosebery Estates Partnership)**

SOUTH EAST EDINBURGH

South of Frogston Road East

- Suggests the land at Frogston Road East be included as a housing site in the Spatial Strategy Summary Map (Figure 1 of the Plan) and Table 4 of the Plan. Requests also that a site brief is included which includes vehicular access from Frogston Road East, landscaped set back frontage along Frogston Road East, footpath connection from Frogston Road East to Broomhills Road, provision of structural tree belt on the south western boundary and provision of SUDs. **(0755 BDW Trading Ltd)**

South of Liberton Drive

- Suggests the land at Liberton Drive should be removed from the green belt and allocated as a Housing Development Site in Table 4 with a capacity of 70 units. **(1202 Land Options East)**

West of Liberton Brae

- Suggests that the land to the West of Liberton Brae and to the North of Liberton Drive should be identified for housing and removed from the green belt. **(2246 Mactaggart & Mickel Homes)**

East of Burdiehouse

- Suggests that additional land at Lang Loan be allocated for housing as a Burdiehouse extension with an indicative capacity of 100 – 120 residential units. **(2279 Hallam Land Management Ltd)**

North of Lang Loan

- Suggests that the site at Lang Loan be allocated as a new housing proposal for 220 houses in Table 4 of the Plan. **(2281 Wallace Land Investment and Management)**

North of Gilmerton Station Road

- Seeks that proposal HSG 24 be extended to include additional land at South Gilmerton to accommodate at least 600-650 residential units. **(2246 Mactaggart & Mickel Homes)**
- Seeks allocation of land to north of Lasswade Road for 160 houses in Table 4 of the Plan. **(2281 Wallace Land Investment and Management)**

Drum (North and South)

- Suggested that the Drum (North and South) should be allocated for housing and associated development, and for the proposal to be included in Table 4 of the Plan. An alternative is suggested that the Drum North be allocated for housing. **(2421 SEEDco)**

South East Wedge (North)

- Suggested that the South East Wedge Parkland boundary and the green belt boundary should be realigned to exclude the Wisp (North) and allocate the site for housing with a capacity of 70 units. **(2265 Springfield Properties)**
- Suggested that the South East Wedge Parkland Greenspace Proposal and green belt boundary should be amended to exclude land at The Wisp (South). The site should be allocated for housing in Table 4 of the Plan with a capacity of 250 units. (2265 Springfield Properties). *Note: added as an update by the council during the examination at the request of Springfield Properties.*

South East Wedge (South)

- Suggests that the site at the Wisp be allocated for housing with a capacity of 400 units. **(2408 HolderPlanning)**

Summary of responses (including reasons) by planning authority:

Site selection

- The LDP must conform to the relevant provisions of the approved SDP and its Supplementary Guidance. These include a requirement for a generous allocation of housing land in the Council's area and the designation of a green belt around Edinburgh (SDP Policies 5, 7 and 12).

  At the LDP's Main Issues Report and first Proposed Plan stages, the provisions of the emerging SDP were such that the emerging LDP could meet its requirement for new housing land within the West and South East Edinburgh Strategic Development Areas. The LDP was also restricted by the Proposed SDP's version of Policy 7 from making large (defined as over 50 units) new greenfield housing releases outwith the Strategic Development Areas. The context of the approved SDP and its Supplementary Guidance now means that the Second Proposed Plan has had to find additional sites, but has been able to do so partly on large sites outwith the Strategic Development Areas. Environmental and infrastructure constraints within these two Strategic Development Areas as identified in the site selection process have meant that some land there is not suitable for allocation

and should be retained in the green belt. This outcome was anticipated in the SDP Supplementary Guidance (paragraph 3.9), and is consistent with SDP Policy 1A, which allows LDPs to identify areas of restraint where justified.

In preparing the LDP, the Council has sought to meet the overall housing land requirement in ways which prioritise use of brownfield sites in existing urban areas and which minimise the loss of land from the green belt, in accordance with SDP paragraphs 113 and 130. The Council's response to the representations in Issue 5 explains why it is nevertheless necessary for this LDP to make significant new releases of greenfield land from the green belt at this time, and of the scale set out in the Second Proposed Plan.

In selecting greenfield housing sites for release, the Council has sought to minimise the impact on greenbelt objectives and to secure long-term boundaries, in accordance with SDP Policy 12 and paragraph 130. To do so, the Council has assessed relevant greenfield land for its suitability in these terms. The site assessment process has gathered evidence on the relevant land on a systematic and consistent basis and presented its findings in a way which enables comparison and hence selection of those sites which are most appropriate. This approach has been informed by consideration of the findings and recommendations of the Report of Inquiry for the Edinburgh City Local Plan (pages 1-21 to 1-26).

For the LDP the Council has set out the evidence of its housing site assessment in the project's Environmental Report, which also presents the statutory Strategic Environmental Assessment of the Plan. The method and criteria used in the site selection process are described in Volume 1 of the Environmental Report – Second Revision, pages 26-33. The site assessments are set out in Appendices 5-9 (Volume 2) and, for some sites, the Environmental Report Addendum. At each stage of the LDP project the Environmental Report has been revised and updated as appropriate to:

- show what regard has been had to statutory representations received at the previous stage;
- respond to changes in the SDP context to the LDP, which have required additional housing land to be found.

The criteria used for the housing site assessment are set out in Tables 6 and 7 of the Environmental Report (Volume 1). They are structured using the three objectives for green belts stated in Scottish Planning Policy paragraph 49 and SDP Policy 12. They correspond to SDP policies and the content of Scottish Planning Policy as set out in Table 1 in the Environmental Report Addendum. The assessment findings set out in the appendices of the Environmental Report include the Council's overall conclusions about whether some or all of a site should be allocated in the LDP.

For ease of comparison, the assessment findings are presented in matrix form in Appendix 2 Updated of the Environmental Report Addendum (an updated version of Appendix 2 of the Environmental Report – Second Revision (Volume 1)). This is intended to be a similar format to that used in the Edinburgh City Local Plan Report of Inquiry. The LDP assessment uses a 'traffic light' symbology to indicate whether a site meets a criterion (green), does not meet it (red), or partly meets it / uncertainty (amber).

For sites selected and allocated in the LDP, a separate, statutory assessment of their likely environmental effects is set out in Appendix 3 of Volume 1 of the Environmental Report. In some cases this identifies likely adverse impacts. Section 4 of the Environmental Report sets these out along with proposed mitigation.

This site selection process has resulted in the Second Proposed Plan's spatial strategy, summarised on Figure 1 of the Plan. It meets the housing land requirements in full while designating a green belt which best meets the objectives of Scottish Planning Policy and SDP Policy 12.

The Second Proposed Plan's spatial strategy establishes and maintains strong, clear long-term boundaries to control the outward growth of the city.

The non-allocation of the following sites and their retention in the green belt is therefore appropriate in terms of compliance with Scottish Planning Policy and SDP Policies 1 A&B, 5, 7, 8, 9 and 12. Further site specific site responses are given as follows.

WEST EDINBURGH

Edinburgh Garden District - East of Millburn Tower

The land was assessed under 'East of Millburn Tower' in the Environmental Report - Second Revision, Volume 2, June 2014 pages 37-39 and page 63 of Volume 1. It was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation.

The site is bounded by the Glasgow Rd (A8) to the north, the City Bypass (A720) to the east, the main Edinburgh-Glasgow railway to the south and Gogar Station Rd to the west.

The site has poor accessibility. Accessibility increases towards the perimeter of the site with the majority of the site scoring A, and a score of B for parts of the west and eastern boundaries. Developer suggests the site benefits from good existing public transport links and will benefit in the future from the Edinburgh Tram and the new Gogar Interchange. PTAL assessment considers northern parts of the site have good public transport accessibility, although there are physical constraints in reaching public transport services. Land further south has poor access to public transport and a physical barrier with community safety issues constraining its access to public transport services in Edinburgh Park. In calculating public transport accessibility, the PTAL methodology calculation is a function of the time to access the public transport stop and the frequency and number of services. The PTAL by definition is only looking at existing public transport accessibility. The tram was taken into account in the assessment. The route is a single service route and being able to access the same service at a number of stops does not influence the score, only the closest stop is considered. Barriers such as the city bypass or the M8 can only be crossed where there is a means to do so. Rail stations at Edinburgh Park and Wester Hailes are not considered to be within reasonable

walking distance.

Whilst the site is low lying it is prominent in views experienced by high numbers of vehicular travellers on the approach to the city. Its open farmland establishes a clear contrast to the edge of the built up area to the east and is viewed against the backdrop of the city's regional landscape setting of the Pentland Hills. Development would alter the pattern of open farmland to the west of the Bypass and diminish the legibility of the urban edge.

The existing urban edge clearly is defined by A8 to the north and to the east by a broad woodland belt along the City Bypass. Any new green belt boundary would not compare favourably with the robust physical and visual nature of the existing green belt boundary along the City Bypass. Woodland belts within designed landscapes to the north and west of the site provide strong topographical features, however the site lacks enclosure to the south west, adjacent to Gogar Station Road.

The site is separated from the existing urban area by the City Bypass to the east, A8 to the north and railway line to the south. Though two under passages exist, the site has limited opportunities for physical and visual integration with the existing urban area.

It is not considered appropriate that development of the site should be viewed in the context of existing development at Maybury and the Gyle. The site is prominent as open arable land in views from the A8 to the north and City Bypass to the east and remote from the existing settlement. The City Bypass and broad woodland belt to the west of Edinburgh Park, maintain a very clear cut distinction between the urban area and surrounding countryside, which will only increase as planting continues to mature.

A new green belt boundary would not compare favourably with the robust physical and visual nature of the existing green belt boundary along the City Bypass. The site's character makes an important contribution to the landscape setting of the city. Despite proximity to the urban area and westbound transport links including the A8, Edinburgh-Fife railway line and M8, the character of policy woodland and settled farmland, associated with a series of relatively intact designed landscapes at Gogar, is rare within Edinburgh and notable on the western edge of the city.

Development of this site would be out of character with the surrounding area which has a distinctly rural character. The Environmental Report – Second Revision (June 2014) did not support development of the site due to the potential for adverse effects definition of the green belt boundary and upon the setting of the city.

At the request of the Planning Committee (19 June 2014), assessment work was carried out in relation to transport and education infrastructure. These used a notional capacity and developable area which assume new flood management infrastructure could be provided, as identified in a flood risk assessment study. These studies provide additional information on the potential infrastructure requirements for this site.

In conclusion, this is not a reasonable site for housing development. The site

accessibility is poor and constrained by physical barriers to the north and east. Due to the sites prominence and its role as open farmland development would affect the landscape setting of the city. The existing green belt boundary is clearly defined and would be eroded by development of this site. Due to the remote location and physical barriers adjoining the site any development would be isolated from the existing settlement and supported developments to the north.

The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt, Gogar Special Landscape Area and Millburn Tower Inventory Designed Landscape.

No modification proposed.

Update from Capital Coalition Motion 14 May 2015:

The Council sees merit in the representation promoting this site as a housing allocation and notes that it has a potential capacity of 1,320 units.

(2275 Murray Estates; 0225 Cramond & Barnton Community Council; 0244 Tony Gray; 0324 Ross Lennen; 0326 Louisa Lennen; 0328 Ian Lennen; 0330 Jeff Deherdt; 0331 Lynne Deherdt; 0651 M Allen & P Scott; 2168 Yvonne Tuffy; 2717 R Davies)

East of Ratho Station

- The National Planning Framework 3 makes clear the continuing need to safeguard the land south of the A8 for the potential relocation of the Royal Highland Centre to allow for future expansion of Edinburgh Airport. Policy Emp 5 sets out the appropriate uses and principles to guide any future redevelopment proposals at this location. This land is safeguarded for the expansion of Royal Highland Centre and its development as Scotland's National Showground.

  The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment (assessed under 'Norton Park'). This site should be retained in the green belt.

  No modification proposed. **(2275 Murray Estates)**

Turnhouse Golf Course

The land was assessed under 'Turnhouse Golf Course' in the Environmental Report - Second Revision, Volume 2, June 2014 pages 15-16 and page 63 of Volume 1. It was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation.

The representation received to the Second Proposed Plan relates to land at Lennie Cottages and land at Turnhouse Farm Road. Land at Lennie Cottages is identified in the Environmental Report – Second Revision (Volume 1 page 30) as too small to assess as a potential housing proposal in the Plan. The potential scale of housing development on this site would therefore be better addressed through the planning application process.

The Turnhouse Farm Road has poor public transport accessibility. The proposed development of (HSG 19) does incorporate a new bus route but this site would be remote from this route.

The Second Proposed Plan June 2014 identifies the ridgeline of Craigs Road and Lennie Hill to form the basis of a new green belt boundary, thereby protecting the Edinburgh's landscape setting within the Almond valley to the north of Edinburgh Airport. Development at Turnhouse Farm Road would undermine these principles and the formation of new green belt boundary based on clearly identifiable visual boundary markers. As a use conforming with green belt policy, Turnhouse Golf Course would remain in the green belt.

The indicative area available for new housing on HSG 19 is set out on page 48 of the Environmental Report – Second Revision, Volume 2, June 2014. Any shortfall in meeting the proposed number of units set out in the LDP would need to be justified upon submission of a comprehensive site masterplan. The Maybury (HSG 19) Development Principles on page 52 of the Second Proposed Plan June 2014 specifically allows for a higher density of development within 400 m of the proposed pedestrian/cycle bridge across the Edinburgh-Fife railway line.

The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt.

No modification proposed. **(2480 Rosebery Estates Partnership)**

SOUTH EAST EDINBURGH

<u>South of Frogston Road East</u>

The land was assessed under 'South of Frogston Road East' in the Environmental Report - Second Revision, Volume 2, June 2014 pages 67-69 and Environmental Report Addendum. It was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation. The representation to the Second Proposed Plan applies to a triangular parcel of land of approx 5.9ha land, situated in the northeast corner of the assessment area. It is bounded by trees and hedgerow planting to Frogston Road to the north and established tree belt at Broomhills Road to the east. Its boundary to the southwest runs from southwest to northwest across the open farmland, broadly to the northeast of existing overhead powerlines. This part of the site has been assessed in the Environmental Report Addendum.

The majority of this part of the site has good public transport accessibility. The Council's landscape and visual assessment notes that development would encroach into an existing green wedge which forms an important part of the landscape setting of the city. Whilst a relatively small component of the wider assessment area, the site is visually prominent and lacks existing robust planted boundaries to the southwest. Development would impact adversely on views from which an impression of the city and its landscape setting can be gained, including: Frogston Road which has a strong visual relationship to the Pentland Hills, the rural context to the City Bypass and recreational views from the Mortonhall path network and northern slopes of the Pentland Hills.

The existing green belt boundary is clearly formed by the strong physical and visual features of the landscape and woodland. The adjoining site HSG21 Broomhills has an established tree belt along its west boundary which will form a clear green belt boundary. The west boundary of this site contains no identifiable landscape features to form the basis of a green belt boundary. The use of the overhead power lines to define a notional boundary is an inappropriate method for defining the spatial strategy of the city. The site also lacks opportunities for physical integration with the existing urban area being set apart from the proposed urban area by the tree belt to the east.

The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt.

No modification proposed. **(0755 BDW Trading Ltd)**

South of Liberton Drive

The land was assessed under 'South of Liberton Drive' in the Environmental Report - Second Revision, Volume 2, June 2014 pages 62-64 and page 64 of Volume 1. It was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation. The representation received to the Second Proposed Plan relates to the field bounded by Liberton Drive to the north and west, Alnwickhill Road to the east and Stanedykehead to the south.

The majority of this site has good accessibility. Development of this site would be out of character with the surrounding area which has a distinctly rural character. The Revised Environmental Report (March 2013) did not support development of the site due to the potential for adverse effects on the landform feature of the Braid Hills and upon views from which an impression of the city and its landscape context can be gained.

Environmental Report - Second Revision (June 2014) considered that development of the entire 3.8 ha site would enclose the remaining views of Liberton House within its wider landscape setting and backdrop of the Pentland Hills, as viewed from Liberton Drive and Alnwickhill Road. The partial development

of the site would continue to introduce urban residential development to the detriment of the City's open southern skyline.The proposal would partly enclose the remaining open aspect of Liberton House and its walled garden, both Category A Listed, which would no longer read as singular landmark features within a rural landscape setting. The existing green belt boundary is clearly formed by Liberton Drive and Alnwickhill Rd, which have an open aspect to the south and west permitting appreciation of the landscape. The open aspect to the south of Liberton Drive and west of Alnwikhill Rd, establishes clear separation between the city and open countryside of the Braid Hills, whilst permitting views across the landscape. Whilst development could form an alternative green belt boundary to the south of the site, it would not establish a more clearly legible boundary on the ground to the west of the site. Development of the site, whilst retaining partial views across the site, would be likely to result in cumulative erosion of the integrity of the green belt in this location.

The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt and Braids Liberton and Mortonhall Special Landscape Area.

No modification proposed. **(1202 Land Options East)**

West of Liberton Brae

The land was assessed under 'West of Liberton Brae' in the Environmental Report - Second Revision, Volume 2, June 2014 pages 58-61 and page 64 of Volume 1. Residential development is being promoted by the developer at southern and eastern locations within the assessment area, considered as unsuitable for development in the MIR stage Environmental Report.

It is agreed that the sites promoted do have good public transport access. Development of southern site would alter the open ridge top setting of Liberton Tower and impact on northward views to the city skyline from the adjoining assessment area 'South of Liberton Drive'. Development of eastern site would impact adversely on the character of an important landform feature and upon views from which an impression of the city and its landscape context can be gained. The sites also lack an established green belt boundary.

Infill development is not considered appropriate in this location, as the existing green belt boundary permits Liberton Tower to be read as landmark feature within a rural landscape setting, whilst enabling northward views to the city skyline. The impact of development on the setting of Liberton Tower and the broader landscape context from which an historic asset can be experienced would be detimental.

The site is visually prominent from a range of recreational viewpoints, including elevated vantage points of Blackford Hill, Braid Hills Drive and Queens Drive. Development of the sites would introduce a relatively large scale urban residential development an area of settled farmland within the urban area, recognised for its contribution to the landscape setting of the city.

Given the exposed boundary to the west of the sites and their visual prominence, development would impact adversely on views towards the city skyline and

landmark open hills on the southern edge of the city, from a range of recreational viewpoints and public roads within the green belt. Despite their proximity to the urban area the development of these sites would be out of character with the surrounding area which has an open rural character.

The sites suggested boundaries would not provide a robust and defensible alternative green belt boundary, in particular to a release of this scale and visibility. Given the site's hillside location, any tree planting would require 10-15 years to establish and mitigate views of the proposed development site.

The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt and Braids Liberton and Mortonhall Special Landscape Area.

No modification proposed. **(2246 Mactaggart & Mickel Homes)**

East of Burdiehouse

The land was assessed under 'East of Burdiehouse Road' in the Environmental Report - Second Revision, Volume 2, June 2014 pages 73-75 and the Environmental Report Addendum. It was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation. The representation to the Second Proposed Plan applies to land to the southeast of Burdiehouse Lime Kilns and north of the Lang Loan, bounded by a countryside track to the west and existing woodland to the east. This part of the site has been further assessed in the Environmental Report Addendum.

The site has poor public transport accessibility and there is no evidence to suggest that the suggested measures for improving public transport accessibility are realistic or deliverable. The Council's landscape and visual assessment notes that development would impact on northward views to the city skyline from the Lang Loan; intensify development upon the existing undeveloped skyline in southward views from within the urban area. In the absence of existing tree cover, development is likely to be visible on the skyline from the City Bypass, which is currently contained by the Gilmerton ridge.

The ECLP Report of Inquiry (p1-68 to 1-76) considered the Candidate Strategic Housing Site – Burdiehouse. The reporter recommended that and area of 4ha, with a capacity of 100 dwellings, be included within the plan and noted the importance of the tree belt. The subsequent planning application now being implemented followed this advice in its landscaping proposals. This land was not included as an allocation within the adopted ECLP but is now included within HSG 22, which allocates 14ha with an estimated capacity of 250-350 residential units.

Development of this site would weaken the existing green belt boundary established at 'The Murrays' where development is set below the 139 m contour

and enclosed by a 50 m wide tree belt. Development would also lie beyond the structure planting required by condition as a result of Planning Appeal ref: PPA-230-2047, which extended the planting at the Murray's westwards to Burdiehouse Road. Both features establish strong containment to the urban area and in the case of proposed allocation HSG 22, a strong landscape edge for new development. The site also lacks opportunities for physical integration with the existing urban area.

The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt.

No modification proposed. **(2279 Hallam Land Management Ltd)**

North of Lang Loan

The land was assessed under 'North of Lang Loan' in the Environmental Report - Second Revision, Volume 2, June 2014 pages 76-77 and the Environmental Report Addendum. It was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation. The representation received to the Second Proposed Plan relates to the whole site 'North of Lang Loan' which was considered in the Environmental Report - Second Revision. Further issues raised by the representation have been assessed in the Environmental Report Addendum.

The site has good public transport accessibility. The Council's landscape and visual assessment identifies the role of this field in forming the buffer between the Murrays and Lang Loan and contributing to the open landscape boundary of the city, particularly when experienced from Lang Loan. The development of this site would erode ridgeline and slopes which form the character of the city edge. Given the topography and visibility of the site, development in this location would be uncharacteristic of the settlement pattern and isolated from it. Whilst planting to the north of the site has begun to enclose some views towards the city skyline significant views remain. The green belt boundary to the north is clearly reinforced by the growth of the existing woodland. Development in this location would weaken this green belt edge and impact upon the wider landscape setting of the city.

The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt.

No modification proposed. **(2281 Wallace Land Investment and Management)**

North of Gilmerton Station Road

- The representation received to the Second Proposed Plan relates to land bounded by Gilmerton Station Road to the south, with housing to the north, field boundary to the west proposed housing site (HSG24) to the east. The land was assessed

under 'North of Gilmerton Station Road' in the Environmental Report - Second Revision, Volume 2, June 2014 pages 80-82 and page 64 of Volume 1.

The majority of the site has poor public transport accessibility. Due to the walking distance from bus services it is not accepted that public transport accessibility could be enhanced. The Council's landscape and visual assessment concludes that development of the open ridge to the west would alter the site's rural character and would have an adverse impact on views from the Bypass and Lasswade Road. Development would alter the character of the open Gilmerton ridge and south-facing slopes. The additional height of development in eastbound views from the Bypass would form a backdrop of urban development to views towards West Edge Farm.

Whilst land to the north of Gilmerton Station Road, lacks enclosure to the west, its north and eastern extent is not prominent in views from the wider landscape and its character is partly influenced by the existing urban edge to the north and east and depot to the south. The proposed green belt boundary on the west of (HSG24) follows the South Farm access road and is considered to reflect the site's visual envelope i.e. its containment in views from the wider, rural, landscape setting of the city as viewed from locations including, the City Bypass, Lasswade Road and Lang Loan. The requested extension of (HSG24) to the more open and visually prominent land to the west along Gilmerton Station Rd, does not serve to integrate new housing with its surroundings as experienced from southern approaches to the City and would impact upon the wider landscape setting of the city.

The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt.

No modification proposed. **(2246 Mactaggart & Mickel Homes)**

- The land was assessed under 'North of Gilmerton Station Road' in the Environmental Report - Second Revision, Volume 2, June 2014 pages 80-82 and the Environmental Report Addendum. It was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation.

  The representation received to the Second Proposed Plan relates to housing to the north, Lasswade Road to the west and sections of field boundary hedgerow to the east and south. Gilmerton Station Road lies beyond the boundary to the south. Where the site raises new issues they have been assessed in the Environmental Report Addendum.

  The majority of the site has good public transport accessibility. The Council's landscape and visual assessment concludes that the development of the open ridge to the west would alter the site's rural character and would have an adverse impact on views from the Bypass and Lasswade Road. The city is generally contained by landform across the western extent of the assessment area and

development would impact adversely on views from Lasswade Road, the Lang Loan and City Bypass. The additional height of development in eastbound views from the Bypass would form a backdrop of urban development to views towards West Edge Farm. The site lacks a robust and defensible green belt boundary. New woodland planting would require between 10 and 15 years to form a strong visual feature in the landscape given the exposed, sloping and visually prominent nature of the site. Unlike the land to the east the site is highly visible from the city bypass. Development in this location would create a visually prominent development to the detriment of the character of Gilmerton ridge and would impact upon the wider landscape setting of the city.

No modification proposed. **(2281 Wallace Land Investment and Management)**

Drum (North and South)

The land was assessed under 'Drum North' and 'Drum South' in the Environmental Report - Second Revision, Volume 2, June 2014 pages 85-89 and page 64 of Volume 1. It was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation. It is suggested that the Drum (North and South) should be allocated for housing and associated development. An alternative is suggested that the Drum North be allocated for housing. The site is bounded to the north by the former Edinburgh to Loanhead railway, to the east by Old Dalkeith Rd (A7), to the west by Gilmerton Road (A772) and to the south by the City Bypass (A720).

The Housing Site Assessment is updated to take account of public transport outwith the local authority boundary on Gilmerton Road. While it is accepted that the site's east and west boundaries have good accessibility, the majority of the site has poor access to public transport, particularly the central areas of the site. There is not yet an agreed route for the Orbital Bus Route project which is required to improve accessibility to the centre of the site. T5 is a multi-purpose transport safeguard which could form part of the Orbital Bus Route project. T5 is shown obscured on the Proposals Map. The objection to the Special Landscape Area is addressed under Issue 2.

The 'Drum North' contains proposed housing site (HSG25) and the land promoted for additional housing referred to as "Drum 2". The Council does not intend to take forward the Main Issues Report reasonable alternative 'Drum 2' for housing. The capacity and physical integration of the site with the existing townscape to the north would be compromised by required mitigation measures relating to the Designed Landscape including:

- The set back of development from the boundary of the Inventory Site and its west driveway at Drum
- Roadside measures to mitigate views to the estate along Gilmerton Rd.
- The severance of the wooded banking required as mitigation to form a robust boundary to the Inventory Site at Drum 1

These constraints would result in a development which is isolated from the existing settlement to the north and does not offer the opportunity to create a logical green belt boundary. While it is noted that the land is not within the Inventory site the land does contribute to the overall experience and character of the landscape, through its open character and wooded boundaries.

The representation received to the Second Proposed Plan also promotes the whole Drum (North and South) for residential led development. The Environmental Report - Second Revision notes that the site's primary role in the green belt is policy woodland and being on elevated terrain. In views from Ferniehill Drive and Old Dalkeith Road, the site provides physical separation between Danderhall and Gilmerton. The site contributes to the continuity of a wider green network which extends from Holyrood Park to the wider landscape of Midlothian and is critical in the separation of Danderhall with the urban area to the west.

It is noted that lower lying and less prominent sites outwith the wooded grounds of the Drum have potential to accommodate development where these would not impact on the house and its enclosed parkland setting. The Drum is of national importance as a site on the Inventory of Gardens and Designed Landscapes in Scotland and setting to a category A Listed Building. Its open farmland, policy woodland and elevated terrain to the north also contribute to the quality, character, landscape setting and identity of the city and are visually prominent from southern approaches to the city and elevated recreational viewpoints. The Council does not support the development parcels identified as part of the submitted Drum Policies Conservation Plan prepared by Simpson and Brown Architects. Insufficient weight in that document is given to:

- The role of the wider policies and farmed estate in contributing to the character and amenity of a relatively intact designed landscape.
- The value of the estate boundary treatments in providing both enclosure to the grounds, contributing to local character and providing and signalling the presence of the historic environment.
- Views towards the designed landscape and its contribution to the character of the wider landscape setting of the city, including maintaining Edinburgh's separate identity from surrounding settlements by forming part of a structural green wedge to the southeast of the city

It is the overall impact on the character of the entire estate which will be unacceptably harmed by the extent of the proposed development. The location of individual pockets of development would not create a cohesive development pattern. The well defined estate boundary creates a condition which isolates development from the adjoining settlement pattern, including Danderhall.

The land adjoining Candlemaker's Park to the north and Drum Street to the west can accommodate development (HSG25) which is well integrated with the existing built up area of Gilmerton and proposed allocation at Gilmerton Station Road. The site's containment limits impacts on the wider landscape setting of the City and impacts on the character and views from the Drum Inventory will be mitigated though supplementary planting to provide a long-term boundary to the Inventory site in this location. The remainder of the site is remote from the existing urban area within Edinburgh or lacks potential for integration due to impacts on landscape character, views and the designed landscape. The northern ridge is

unsuitable for development due to its prominence in views from major roads and popular recreational viewpoints, including the South East Wedge Parkland at Edmonstone.

The southern extent of the site is visually prominent in views from the A7 A772 and A720 forming a foreground element in views on the approach to the city. Residential development would alter the rural character of open agricultural fields. Loss of this open context would give rise to perceptions of a continuous built up area between Edinburgh and Midlothian.
Drum South is remote from the existing built up area and provides an open agricultural setting to the south of the city in views from arterial approaches and lacks features capable of forming an alternative green belt boundary.

The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt. The site contains a Local Nature Conservation Site, Inventory Designed Landscape and the Drum Special Landscape Area.

No modification proposed. **(2421 SEEDco)**

South East Wedge (North)

- The land was assessed under 'South East Wedge (North)' in the Environmental Report - Second Revision, Volume 2, June 2014 pages 97-99 and Environmental Report Addendum . It was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation. The representation received to the Second Proposed Plan refers to the Wisp (North) proposal.This reduced area of site has been assessed further in the Environmental Report Addendum.

  A representation was received to the Second Proposed Plan referring to the Wisp (North) proposal. Comments on this specific site can be found in the Environmental Report Addendum (May 2015) (p 46-50, purple text – to be read with all other relevant text)

  The assessment concluded that the site has very poor public transport accessibility. The Council's landscape and visual assessment finds that development of land at The Wisp (North) would impact on northward views from the Wisp and proposed parkland, where the open character of the land is valuable in providing a foreground to enable appreciation of the city skyline. From recreational viewpoints within the city, development would form a built up edge to the southern skyline of the city which is formed by The Wisp and Edmonstone, leading to perceptions of a continuous built up area with development in Midlothian. Development of the site would impact upon the wider landscape setting of the city.

  The site lies on the periphery of Little France, Craigmillar and Danderhall. The

planned open space contains important topographical features and has an important role in providing open space and path routes connecting through the settlements. Development of the site would prejudice formation of Greenspace Proposal 4, which in combination will parkland trees and woodland planting would serve to define the edge of the City in relation to parallel development in Midlothian. The introduction of housing along the Wisp would therefore weaken the definition and boundary of the green belt. The development of the greenspace proposal will provide a robust boundary to Edinburgh's green belt in this location through additional planting. The existing settlement pattern is limited to a row of small cottages at the junction of Millerhill Road and The Wisp. A major housing development would neither extend this rural characteristic nor relate to the Greendykes masterplan and its respective landscape framework.

The allocation of the Wisp (North) site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt and allocated as part of Green Space Proposal GS4.

UPDATE: A notice of intention to allow an appeal for housing development on the Wisp (North) site was issued on 3 November 2015 (PPA-230-2129).

A representation was received to the Second Proposed Plan referring to the Wisp (South) proposal. Reference to it was omitted from the Schedule submitted by the Council in June 2015. However, the Council has previously considered the issues raised by this site. The Council set out its assessment of this land under 'South East Wedge (North)' in the Environmental Report - Second Revision, Volume 2, June 2014 pages 97-99. It was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation. In addition it should be noted that part of the site is a Scheduled Ancient Monument, and were it to be allocated in the Plan the impact on cultural heritage would need to be assessed in the Strategic Environmental Assessment process.

The allocation the Wisp (South) site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment as described above. The site should be retained in the green belt and allocated as part of Green Space Proposal GS4. *Note: added as an update by the council during the examination at the request of Springfield Properties*.

No modification proposed. **(2265 Springfield Properties)**

South East Wedge (South)

The land was assessed under 'South East Wedge (South)' in the Environmental Report - Second Revision, Volume 2, June 2014 pages 9-96 and the Environmental Report Addendum. It was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development,

accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation.
The representation received to the Second Proposed Plan omits the former walled garden and 'Eight Acre Field'. The site is bounded to the west by Edmonstone's central ornamental woodland which lines its southern driveway. It is bounded by the A7 to the south, The Wisp to the east and an existing tree belt to the north.This reduced area of site has been assessed further in the Environmental Report Addendum.

The assessment concluded that the site has good public transport accessibility. This site is part of the wider estate which is to be restored throught the Estate Management Strategy secured through planning permission 12/01624/FUL for the adjoining land to the west. The allocation for housing would not be compatable with the restoration of the landscape.

Site sits at eastern end of prominent ridgeline spanning north eastwards across the southern edge of the city, from Burdiehouse in the south west. The Council's landscape and visual assessment finds that development of the site's open parkland would impact on the sites designed landscape character. The site is prominent in views from the A7, where the additional height of development would be conspicuous on the skyline. Site has a key role as part of an existing strategic green network which extends from Holyrood Park to the wider landscape of Midlothian.

Adverse visual effects upon views to the site from The Drum, the A7 and The Wisp have been confirmed by the Environmental Statement submitted to evidence planning application ref: 14/01057/PPP. Mitigation planting to the estate boundaries will enclosed the open character of the estate's southern parkland and diminish separation this provides between Edinburgh and Danderhall which maintains their identities as distinct settlements. This role of the estate's parkland was considered as part of Planning Appeal (PPA-230-2087) with regard to granting of residential consent within two relatively discrete enclaves at Eight Acre Field and the walled garden.

The remaining parkland is open in character and lacks enclosure. Development of this site would break the continuity of the green belt, which encircles the city to the southeast.

The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt and allocated as Green Space Proposal GS4. In addition the site contains a Local Nature Conservation Site and Edmonstone Special Landscape Area.

No modification proposed.

<u>Update from Capital Coalition Motion 14 May 2015:</u>

The Council notes that the Reporter's decision in relation to Edmonstone (PPA-

230-2131) will add another 368 houses to the housing supply which is not included in the Council's windfall assumption. This additional supply could be used to reduce the housing total for Brunstane HSG 29 (Issue 10) by the same amount. **(2408 HolderPlanning)**

Reporter's conclusions:

Context

1. The housing land requirement is set out in SESplan. The associated Supplementary Guidance (Housing Land November 2014) breaks down the requirement for each of the council areas including the City of Edinburgh. There is a statutory requirement for this local plan to demonstrate consistency with SESplan. In this context the proposed plan must identify a corresponding supply of housing land which should be effective or capable of becoming effective to meet the target over the plan period.

2. My conclusion on Issue 5 is that additional housing land is required to meet the strategic target. Regeneration is an important objective and green belt can assist in focussing development within the city and on brownfield sites. However, the strategy also requires the release of sustainable urban edge sites. I consider that the principle of green belt release in West and South-East Edinburgh and in particular within the Strategic Development Areas is supported through the development plan strategy including Policy 12 on Green Belts. SESplan Policy 7 enables the release of greenfield sites either within or outwith the identified Strategic Development Areas to maintain an effective five year housing land supply where:

a. The development will be in keeping with the character of the settlement and the local area

b. The development will not undermine green belt objectives

c. Any additional infrastructure required as a result of the development is either committed or to be funded by the developer

3. At the hearing parties unanimously pointed the examination towards the inclusion of additional sites to meet the identified shortfall. This approach was favoured to provide greater certainty, avoid delay and better allow for the planned provision of infrastructure.

4. The council's Transport Appraisal March 2013 (and addendum 2014) and the Revised Education Appraisal June 2014 (as corrected September 2014) are relevant to my consideration of cumulative impact. However, with the exception of the site East of Millburn Tower these assessments do not include the sites suggested through this schedule 4.

Green Belt Issues

5. Through Issue 5 I accept the case for inclusion of additional effective greenfield/green belt sites. However, addressing the housing land supply is only one of a number of considerations. Issue 2 references requests for the green belt boundary to be reconsidered to accommodate further land for housing development. I consider it is necessary to consider the cumulative effect of changes to the green belt in areas where urban expansion is proposed. In West and South East Edinburgh the proposed plan is

already proposing significant changes to the long established green belt. (see also Issues 7, 9 and 20). In its response to Further Information Request 30 Scottish Natural Heritage states that proposals to alter the green belt should be assessed in the context of paragraph 49 of Scottish Planning Policy and informed by strategic analysis of the area.

6. The council has assessed green belt objectives through its appraisal of sites suggested for inclusion in the proposed plan. The last strategic review of the green belt, in 2008 was based on landscape and open space characteristics rather than a wider view of directing development to sustainable locations. However I consider it remains of some relevance to my assessment below.

7. For West Edinburgh changes are proposed to the boundary to accommodate housing land and airport related development. The existing boundary established by Maybury Road is to be replaced by new boundaries relying on landform and significant new planting proposals. To the south of the Glasgow Road the Bypass is retained as a long term defensible boundary and I return to this matter below in the context of the suggested housing site East of Millburn Tower.

8. In South East Edinburgh revisions to the green belt are relatively more complex. Proposals in the plan must be considered alongside recent appeal decisions at Lang Loan, Gilmerton Station Road, Edmonstone and the Wisp. These changes have prompted my careful consideration of a long term defensible green belt on this urban edge taking into account known pressure for further housing land release. I consider it is also important to avoid the potentially inappropriate creation of significant new landscape buffers where these could run contrary to the objective of ensuring that future development achieves integration with and accessibility to the adjacent urban area. These considerations have informed my assessment of specific sites below.

Cumulative Transport Assessment

9. When recent appeals and planning applications have been considered, as referenced below, cumulative transport and cross-boundary impacts have not been raised as a significant issue either by the council as roads authority or by Transport Scotland. Through this examination the council states that its action programme could address additional impacts but that more significant transport interventions may be required should more sites be included in the Strategic Development Areas. Transport Scotland cautions against further additions in the absence of a proper assessment of cumulative traffic impact taking into account cross boundary effects. These considerations have informed my assessment of the additional sites as referenced below.

Strategic Environmental Assessment and Public Consultation

10. Circular 6/2013 states that reporters require adequate environmental information to be provided to them, together with evidence arising from public engagement, without this they will be unable to recommend modifications to the plan on particular sites. Whilst additional sites suggested in representation were not included in the Strategic Environmental Assessment (SEA) process they were included (sometimes as part of larger land areas) as part of the main issues consultation. They were also assessed by the council (although not against SEA objectives) through its Environmental Report Second Revision June 2014 and May 2015 addendum. My further information requests invited comments from relevant community groups and others, including the SEA consultation authorities. The sites referenced below were included in the council's site

assessments as published alongside the proposed plan although sometimes as part of a larger site area. A number of sites have been subject to further consideration through the planning application process. Any recommendation to include further housing sites would have to be based on sufficient environmental information and evidence arising from public engagement. Issue 5 explains my concerns regarding a lack of transparency and wider consultation were this examination to promote a total land release within West and South-East of Edinburgh which was significantly in excess of that envisaged by SESplan.

WEST EDINBURGH

11. The National Planning Framework 3 and SESplan recognise the role of West Edinburgh as a focus for growth. Public transport improvements including the Edinburgh tram and the Edinburgh radial bus route will enhance the accessibility of the identified Strategic Development Area as a focus for housing and employment growth. It is an area identified for significant change around the airport and International Business Gateway. New housing sites at Maybury and Cammo, as included in the proposed plan, are assessed through Issue 7 where my conclusion is that these are appropriately included as housing sites. These proposals will result in a redefined green belt on this edge of the city.

Edinburgh Garden District - East of Millburn Tower

12. This site has an estimated capacity of around 1300 houses and was subject to consultation at the main issues stage where it was included in the list of other sites which did not score as well against the council's assessment criteria. At that time these sites were not considered to be needed to meet the strategic housing requirement.

13. A number of representations support this site as an alternative to the proposed allocation at Cammo and to sites in Balerno. They consider this site has more adequate transport infrastructure and an identified developer with the resources required to deliver schools and other facilities. However, my assessment of the land supply position is that additional housing land is required (see Issue 5). Substituting one site which is effective or capable of becoming effective with another would not assist in meeting this shortfall. The council at its committee meeting of 14 May 2015, following further assessment of the site and contrary to the view of its officers, concluded that there was merit in the representations which promote this site. I note this support has recently been translated into a decision to approve an outline planning application (2 June 2016).

14. However, this decision is subject to a Ministerial Direction reserving the right to call in the application for determination by Ministers. This reflects concerns about the impact of the proposal on the operation of the adjacent agricultural research facility. I return to my assessment of this matter below.

15. This site, located to the east of Millburn Tower, is the section of the Garden City proposal which is included in the Strategic Development Area for West Edinburgh. The site is in the established green belt west of the City Bypass (A720). It is bounded to the north by the A8 Glasgow Road, the main Edinburgh Glasgow railway to the south and to the west by the tree belt along Gogar Station Road. This forms the boundary to the grounds of the Royal Bank of Scotland Headquarters.

16. I have taken account of the supporting documents provided by Murray Estates – Edinburgh Garden City Final Report May 2011 and the main issues submissions by

Holder Planning January 2012 (2275). There were also further exchanges as part of the May 2016 further information requests including details relating to the outline planning application.

Green belt and landscape impact

17. The council's officers consider the site is prominent in views experienced by a high number of vehicular travellers on the approach to the city. The officers' assessment is that development here would alter the pattern of open farmland to the west of the Bypass and diminish the legibility of the urban edge. They disagree with the submissions that it would be viewed in the context of existing development at Maybury and the Gyle. The site is prominent as open arable land in views from the A8 to the north and the City Bypass to the east. The City Bypass and broad woodland belt to the west of Edinburgh Park, maintain a very clear cut distinction between the urban area and surrounding countryside, which will only increase as planting continues to mature.

18. The existing woodland belts associated with the designed landscapes to the north and west of the site are acknowledged. However, officers consider any new green belt boundary would not compare favourably with the robust physical and visual nature of the existing green belt boundary along the City Bypass. This also limits the physical integration of new development with the existing townscape.

19. Murray Estates consider there are inconsistencies and flaws in the council's Environmental Report, with respect to key criteria of accessibility, landscape impact and defensibility of green belt boundaries. The site is considered to perform well against the council's assessment which does not properly take account of the potential for mitigation. Defensible green belt boundaries can be formed by surrounding roads and new tree planting to reinforce boundaries to the south and west.

20. The site is open farmland and I agree that it establishes a clear contrast to the edge of the built up area to the east. On my site visits I noted the view from the A8 where the site is seen in the foreground of the regional landscape setting of the Pentland Hills. I note the location of the site adjacent to the Inventory Designed Landscape of Millburn Tower.

21. My assessment is that the wooded estate policies along the western boundary create a sense of enclosure and backdrop to the site when viewed from the city bypass and the A8. I consider that this established woodland belt could be managed and enhanced to achieve an effective green belt boundary. However, I agree with the council's officers that it would not be as clear, consistent or legible as that already defined along the edge of the City bypass.

22. I also recognise the role of this land in enabling open views from the A8 towards the Pentlands. However given its low lying nature and location relative to the road network, or other public approaches, I consider the site has a much more limited function in protecting views into the city and its key landmarks. Views across the site would mainly be restricted to passing glimpses and a perception of open green space by those travelling along the busy A8 on the approach to Gogar. Those travelling along the bypass also enjoy the open aspect over the fields to the wooded policy boundary to the west but only at those points where the site is not screened by trees. The green belt here enables access through the site from Edinburgh Park by the footpath/cycle way referenced as T8 on the proposals map. However at the time of my site visit the condition of the underpass

and the path itself did not indicate a particularly attractive or well used route. I do not consider that the proposed development would impinge on recreational access to any significant extent particularly as the development could enable the establishment of new and enhanced pedestrian and cycle links.

23. Once the major public transport infrastructure developments are complete around Gogar and development is underway at the International Business Gateway and Maybury I consider the distinction between urban and rural on this edge of the city will become relatively less defined. The site lies between the bypass and the not inconsiderable development associated with the Royal Bank of Scotland's Head-Quarters. I have not disagreed with the council's decision to retain the land associated with the bank operations in the green belt (see Issue 2). However, I consider the access and over-bridge combined with the extent of development on the other side of the road serves to signal arrival within an urban area.

24. In conclusion, I consider there would be a significant localised impact on landscape particularly in the context of loss of an open view to the Pentlands and the countryside setting to the west of the bypass. I do not consider there would be a significant impact on the wider quality, character, landscape setting and identity of the city or on recreational access. The development would not raise issues of coalescence. However, I accept that the bypass currently provides a strong and consistent boundary to the green belt.

Transport Impact

25. The council's East of Millburn Tower Transport Appraisal January 2015 forecasts the main traffic impacts focussing on the A8 Glasgow Road and A71. I note the site would also generate a significant number of potential peak period trips by bus. Given the location of the site existing facilities would require upgrading and new bus services would be required to serve the site. An increase in trips by rail (mainly to nearby tram stops but also the Gogar Gateway rail station) and tram would also require enhanced access.

26. There are access options including from Gogar Station Road along the east boundary of the site and potentially from the Royal Bank of Scotland Access Road. This is likely to require some upgrading from the east section of Station Road. There is also an opportunity for bus only access under or over the A720 City Bypass to Edinburgh Park.

27. For bus infrastructure the assessment identifies three options:

- Option 1 – extend bus services from the RBS access road to run internally around the site
- Option 2 – allowing bus services to run through the site from RBS into Edinburgh Park (may require upgraded vehicular access under/over the A720)
- Option 3 – provide a shuttle bus service between site and key locations (this option should only be considered if Option 1 or 2 were not provided).

28. Use of the train would require enhanced pedestrian/cycle links with the train/tram interchange at Edinburgh Gateway and an enhanced pedestrian/cycle link with Edinburgh Park Station (train and tram). There is also potential for use of the tram subject to pedestrian/cycle links with the tram stop at Edinburgh Park and a pedestrian/cycle link with the tram stop at Gogarburn.

29. Active Travel could be encouraged by high quality pedestrian and cycle routes within the site and links to suitable exit points around the site boundary. There are two existing A720 underpasses connecting the site into Edinburgh Park. Whilst these could be upgraded my site visit confirmed current issues of safety and surveillance relative to use of these relatively long underpasses. I note this matter is reflected in concerns raised by the council's officers in reporting on the outline planning application.

30. I consider the road network is a significant barrier to access through to Edinburgh Park and its tram stop and to access public transport options to the north of the site. This constraint may only be addressed through the costly provision of a new pedestrian/cycle over-bridge(s) unless the detail of any underpass design can fully address safety issues and the provision of an access that would not discourage pedestrian use. I note the assurances of Holder Planning in this respect and the difficulties in achieving an over-bridge. In addition pedestrian/cycle access on the east section of Gogar Station Road would require upgrading of existing narrow sections. Improved pedestrian/cycle links to key surrounding locations, including the Edinburgh Gateway train/tram interchange, Gogarburn tram stop and other routes, would also be required. A travel plan would be required to implement mode share targets, a monitoring regime and potential additional mitigation measures.

31. The council's transport appraisal summarises the required interventions as follows:

(a) Enhanced vehicular access across the A720 from the site into Edinburgh Park (likely to be restricted to buses, cyclists and pedestrians)
(b) Widening of the existing road at the narrow bridge on Gogar Station South immediately south of RBS site
(c) Widening of the existing railway bridge on Gogar Station Road
(d) Widening of the existing narrow section of Gogar Station Road near Daltons site
(e) Upgrading the existing east section of Gogar Station Road to link with new south east vehicular access to site
(f) Contribution to a Gogar Junction enhancement scheme

32. My conclusion is that the site has good potential accessibility with proximity to existing major public transport infrastructure. This reflects the basis on which this locality was identified as a Strategic Development Area. In an Edinburgh and indeed a national context there must be few general locations which offer such good public transport accessibility. However this potential could only be realised if the significant constraint of dislocation by the surrounding road network and urban area can be over-come. This would require bus services to connect through the site as well as safe pedestrian linkages to the east and north. I consider these details would be particularly important to demonstrate how mode share targets are to be met and to show that the site can be effectively integrated with the existing urban area.

33. I note Transport Scotland's response to the outline planning application is not phrased in the manner of an objection:

"The Director does not propose to advise against the granting of permission. Transport Scotland's response is provided on the understanding that the City of Edinburgh Council will make provision, if deemed necessary as a consequence of the SESplan Cross Boundary Transport Appraisal, for an agreement with the applicant to make an appropriate and proportionate contribution to address the cumulative impact on the strategic transport network and for a related action to be incorporated within the Council's

Local Development Plan."

34. It is not clear to me that these matters are addressed through the conditions or the terms of the legal agreement referenced in the council's decision to approve the application subject to any subsequent Ministerial decision (Report of pre-determination Hearing 2 June 2016).

35. In any event, Transport Scotland's response to this proposed plan and any suggestion of additional allocations has been addressed in stronger terms. Submissions to the hearing by Transport Scotland went as far as stating that the plan as it stands could not be supported given the lack of appropriate assessment and clarity about the appropriate mitigation. This matter is assessed in more detail through Issue 19 where potential conflict with SESplan is also assessed.

36. In response to my further information requests on the potential inclusion of additional sites Transport Scotland re-iterated its concerns to state that there is a lack of information on area specific infrastructure and a limitation in modelling the sites. The assumptions on feasibility are not considered to be supported by appraisal to clearly identify the necessity for the improvements in the first place, their deliverability and any work to identify how they may be funded. Its response is perhaps best summarised by the statement "The addition of sites will only add to the scale of issues experienced on the network within and around Edinburgh with no suitable appraisal of the potential impact or deliverable mitigation measures identified." In advising the council committee on the outline planning application I note that officers reported that the application was premature as it would not fully take account of traffic impact should this examination recommend all the existing sites in the proposed plan are retained. (Report of pre-determination Hearing 2 June 2016).

37. There are also significant local concerns about the extent of existing proposed development and its traffic and air quality impacts. The East Craigs Action Group in summary state that in essence the proposal is to allow development to happen on an iterative basis with developer contributions taken but with no clear master-plan as to how to tackle the transport issues and with the knowledge that the City of Edinburgh Council will not have sufficient funds to address the emerging increased traffic problem.

38. I recognise the potential accessibility benefits of the site and accept that none of the above demonstrates that appropriate mitigation could not be secured. However, I consider there are significant remaining uncertainties, not least adding further to cumulative transport impacts in an already congested part of the city, without clarity as to the sufficiency and deliverability of any proposed mitigation.

Flood Risk

39. I note the site is shown on the proposals map as including areas of importance for flood management. In my assessment of this issue I have drawn on the East of Millburn Tower, Gogar, Edinburgh Flood Risk for Development Capacity Assessment (26 January 2015). I note the Gogar Burn traverses the site twice; once before entering a culvert under Edinburgh Park and once after leaving the Park and that this is the main source of potential fluvial flood risk on the site. The modelling used to consider flood management scenarios was identified in a separate strategic flood risk assessment for the Gogar Burn catchment. This showed three flood management options:
1. Upstream flood storage.

2. Diversion channel for flows under Edinburgh Park.
3. Bypass channel for flood flows unable to pass through culvert under Edinburgh Park.

40. I note that initial storage calculations suggest that storage upstream of the site could reduce peak flows passing downstream by as much as 50%, reducing the floodplain extent substantially. Model runs also show that a channel diversion/bypass option would mitigate flooding risk associated with the culvert through Edinburgh Park without significantly increasing flows passing downstream. The study references that additional wider benefits could be gained by combining the channel diversion/bypass option with upstream storage which would not only mitigate flooding risk at the Edinburgh Park area, but would also reduce flood risk along the full length of the burn including Edinburgh Airport

41. I have referenced above the council's view that the housing capacity of the site would be reduced by the fact that parts of the site are likely to be undevelopable due to fluvial flood risk particularly along the Gogar Burn and Murray Burn. I am conscious of Scottish Planning Policy on flooding which requires safeguarding of flood storage and conveying capacity as well as the location of development away from flood plains and areas of medium to high risk areas. A precautionary approach to flood risk from all sources points to the need for further assessment of the risks on this site to further define areas of constraint and any required mitigation. This would require assessment in the context of Policy Env 21. Issue 22 recommends a change to the supporting text for this policy to state: "Proposals will only be favourably considered if accompanied by a flood risk assessment demonstrating how compensating measures are to be carried out, both on and off the site, and that any loss of flood storage capacity is mitigated to achieve a neutral or better outcome."

42. I find nothing at this stage to suggest that flooding constraints would be unacceptable. Further detailed assessment would be required so that appropriate flood mitigation options could be appropriately addressed and any areas of significant risk avoided. This may result in a revision to the capacity of the site to avoid areas at risk but I do not consider that this matter alone would prevent inclusion of this site.

Education

43. In summary, the council's assessment identifies the required education infrastructure for the East of Millburn Tower site, which would be in addition to the infrastructure required for all the other development already included in the proposed plan, as:

- A new double stream 14 class primary school (with a fully remediated and serviced site for its delivery)
- A 2 class extension at St Cuthbert's Primary School
- Additional High School capacity for 254 pupils with a feasibility study required to determine the best location for its delivery
- Additional capacity for 45 pupils at St Augustine's High School

44. If this site were to be allocated, this mitigation would have to be added to that required to address the cumulative impact of the other housing sites in the vicinity, specifically Cammo, Maybury and Edinburgh Park /South Gyle. It would fall to the

proposed Supplementary Guidance on developer contributions(see Issue 21) and the action programme to define the costs, mechanism and timing of delivery. The promoters of the site state that education requirements can be met and the council stated at the hearing and elsewhere that education provision would not be a barrier to development. However, I am conscious of community concerns in this respect and that the council has accepted a funding gap in relation to the required education provision based on the proposals in the proposed plan. I consider these further requirements could perpetuate existing concerns about delivery and funding.

Science and Advice for Scottish Agriculture (SASA)

45. The Scottish Government on behalf of SASA through Further Information Request 28 clarifies its concerns about housing in the green belt in this location adjacent to a significant national agricultural research facility.

" A reduction in biosecurity would jeopardise the Scottish Government's ability to meet its statutory duties and cause commercial damage to the agricultural and food chain businesses which rely on SASA's work. Damage to SASA's genetic resource collections could involve irretrievable loss of international significance."

46. Murray Estates counter this with reference to a lack of evidence that housing and the research facility cannot co-exist. They consider existing signage around the farm illustrates that competing uses are already managed with signs providing advice to dog walkers. They consider it is not unusual for research farms to be located close to residential development or recreational routes and that there is potential for mitigation through enhanced fencing, boundary treatment and signage.

47. In response to this SASA states that one of the most important components of its current security is location within the green belt in an area of low population pressure. It explains that normal conflicts expected by farming in the urban fringe are more critical. Theft, damage or disturbance could result in the invalidation of trials with consequent delay of at least one year or in the permanent loss of a genetic resource. Disruption could result in complete and permanent loss of an irreplaceable genetic resource. The Scottish Government has an international obligation to preserve such resources through the Convention on Biological Diversity, in particular Aichi Biodiversity Target 13. It references the importance of its work and its statutory responsibilities and the fact that other research facilities have had to move to rural locations. Its laboratory facilities are a substantial investment and rely on the adjacent capacity for field trials. In conclusion it states that were development to go ahead consideration would need to be given to moving the farm. This would require considerable time and expense, particularly given the strict requirements in terms of location, soil type and plant health. An intensive exercise would be required to quantify this.

48. For these reasons it is SASA's view that it is desirable and possibly vital to maintain the green belt to the east of its facility. However, I acknowledge that it currently functions on the edge of the city next to a major employment use. I also acknowledge that accommodating Edinburgh's future development needs in sustainable locations has meant that the green belt is not sacrosanct. This is accepted by SESplan. On the other hand an urban expansion adjacent to the research facility would undoubtedly bring more potential for contamination and disturbance. It is not clear that the anticipated impacts, about which SASA are concerned, could feasibly be managed or whether agreement on a workable solution could be reached. In balancing these two potentially competing uses,

on the basis of the evidence available at this time, I find that more weight must be attached to the protection of a nationally important research facility.

Overall Conclusion: East of Millburn Tower

49. The site benefits from location in the Strategic Development Area. Appropriate development would require significant transport interventions and education capacity enhancements. I have remaining concerns about the integration of the site with the urban area given its location relative to the transport network and the implications that a failure to fully address appropriate mitigation would have on the use of private cars. Modal shift would be dependent on safe and convenient access across or under the bypass as well as achieving bus access through the site and appropriate links to the main public transport hub to the north. From the evidence before me I consider there are remaining uncertainties in this respect. I consider much of the suitability of this site in transport terms rests on the details of achieving safe and convenient access over the significant barriers formed by the road network. However, I recognise the scope for mitigation and do not consider these matters alone justify non-inclusion of the site.

50. My assessment must involve some comparative assessment with sites that the council has chosen to include in the proposed plan. In this respect I note the site at Maybury as included in the proposed plan is not dissimilar. It requires a pedestrian/cycle bridge across the railway and provision for bus routeing through this site. There is also a requirement for an on-site primary school.

51. I have considered whether transport and education matters could be addressed in a similar fashion as for other sites in West Edinburgh such as Maybury. This would establish the scope of potential infrastructure works to facilitate the strategy for that area and provide the basis for further assessment and an approach to cumulative contributions. However this would be a major strategic scale of housing land release over and above that envisaged in SESplan.

52. Addition of over 1000 houses on this site would accentuate uncertainty regarding cumulative and cross boundary effects. As explained through Issue 19 The Cross Boundary Transport Study could require a more significant extent of transport interventions than currently envisaged. There are already concerns about how the existing schools requirements for sites already included in the proposed plan are to be funded and addressed. Added to this and perhaps most significantly there are the unresolved concerns relating to the continued operation of a nationally significant research facility. Taking all of this into account I do not consider it would be appropriate to allocate this site for housing through this examination.

53. It could be argued that similar circumstances to those I have outlined for South East Edinburgh also apply here. A new green belt boundary could be established recognising the potential for future growth. I accept that local landscape impacts could be sufficiently addressed by a layout and landscaping framework which maintains view corridors through the site and a landscape buffer along the road corridors. In addition, my conclusion above is that it would be acceptable, although not preferable, to establish an alternative green belt boundary following the deciduous tree belt along the western boundary to the east of Millburn Tower. This boundary could be managed and enhanced as a principle of any development of the site.

54. However, I find the circumstances here are not directly comparable to those in

south-east Edinburgh. This is a significant land release in an area to the south of the Glasgow Road and west of the bypass where the urban edge is not currently breached by existing or proposed housing development. I consider the extent of existing constraints to future development are significant and sufficiently uncertain at this stage as to caution against weakening this long established green belt boundary.

55. The site would contribute a significant capacity of over 1000 houses to the overall capacity of the land supply. However I do not consider the benefits of adding to the supply of effective housing land outweigh my current concerns as expressed above.

56. The site is part of a larger proposed master-planned site extending to 650 acres with up to 3500 houses which is considered in more detail through Issue 16. Drawing on the conclusions in Issue 16 I have considered whether the overall vision of the Garden District based around an urban village model could present a long term growth opportunity for the city. I recognise that a comprehensive master-planned approach on such a scale has an enhanced potential to address infrastructure delivery. Whilst I note some interesting concepts were proposed through the Charette process this larger proposal would result in a much more significant incursion into the green belt and lie outwith the Strategic Development Area. I consider the lead in times to master-planning such a large site and the more complex considerations of infrastructure delivery and associated transport impact as well as its more significant impacts on green belt objectives weigh against inclusion. In any event I do not consider that consideration of the site as a whole overcomes my concerns regarding current constraints on this site East of Millburn Tower.

East of Ratho Station

57. The site is reserved as part of a larger site for the potential relocation of the Royal Highland Centre. The West Edinburgh Planning Framework has now been superseded by the relevant provisions of the National Planning Framework. The National Planning Framework 3 references the relocation of the Royal Highland Showground to support the airport area as a gateway for investment and to support the creation of an International Business Gateway. This objective is reflected in Scottish Planning Policy. Whilst this may create some uncertainty and the reserved land area may yet prove larger than required these proposals are of national importance. I consider a longer term planning approach is justified.

58. In any event this would represent a significant expansion of Ratho Station in addition to the housing already allocated through HSG 5. I consider this would be inappropriate given the size of this community, the facilities it provides and its more peripheral location. I note references in the submissions to the village stagnating and the need for more people to support local facilities and that a community centre could be funded through this land release. However given I have no certainty or details on this matter I have not afforded it significant weight and do not consider this potential community benefit would over-come my other concerns.

59. For these reasons I do not consider this additional housing site should be included.

Turnhouse Golf Course

60. This site is a long rectangular piece of land extending north-west of the proposed HSG 19 allocation at Maybury between the railway and Turnhouse Farm Road. This is a

smaller area than that assessed by the council as Turnhouse on pages 11 and 12 of the Environmental Report second revision June 2014. It is grazing land where some established trees, field boundaries and a change in levels afford the site some degree of enclosure. However, until HSG 19 becomes established this suggested addition remains very peripheral, is of a rural character and is detached from the urban area, public transport provision and other services. It would extend beyond the proposed new long term defensible green belt boundary on this edge of HSG 19. I have considered the supporting submissions which state that the housing numbers on the HSG 19 will only be achieved with additional land availability. However the site will be programmed out over a number of years and density and layout will not be confirmed until the detailed planning stage. I do not consider inclusion of this site either as an extension to HSG 19 or as a separate housing proposal could be justified at this time.

61. A smaller site at Lennie cottages is also proposed. However the proposed plan through table 4 only addresses the allocation of larger sites. I agree with the council that this smaller infill site would fall to be assessed as a planning application. The allocation of this site would in any event have required the proposed green belt to extend to the rear of the existing cottages. I consider that it is more appropriately retained along Craigs Road which provides a robust boundary to the HSG 19 allocation. Its inclusion as part of the larger HSG 19 site raises similar issues to that above given that optimal densities and site layout are yet to be confirmed through the master-planning process. Adding these sites at this time, given the anticipated programming of the larger site, would in my view do little if anything to contribute to any immediate shortfall in the housing land supply.

SOUTH EAST EDINBURGH

62. SESplan recognises South East Edinburgh as a Strategic Development Area which also extends into the Midlothian Council area. This area is served by the City Bypass and Sheriffhall Roundabout. The strategic plan recognises that these are operating close to capacity and are severely congested at peak times. Growth in South East Edinburgh through green belt release where necessary has been promoted since the 1990's. This was based on public transport accessibility and lower landscape quality. Table 3 of SESplan identifies South East Edinburgh as the second highest source of anticipated housing completions second only to the Edinburgh Waterfront. Representations on other sites in the proposed plan reference the extent of development in Midlothian which is likely to access the city from this side adding to existing congestion on the local road network and at key junctions.

<u>South of Frogston Road East</u>

63. This is a triangular parcel of agricultural land extending to the west of the proposed allocation at HSG 21 Broomhills. It is 5.9 hectares with an indicative capacity of 140-190 units. The land was assessed under 'South of Frogston Road East' in the Environmental Report - Second Revision, Volume 2, June 2014 pages 67-69. The site is bounded to the east by Broomhills Road and to the north by the B701. The south west boundary is marked by a line of pylons. I understand from the submissions that the area south of the proposed site is undevelopable due to its importance for flood management. Land to the north and west is in a Special Landscape Area. The council accepts the majority of this site has good public transport accessibility.

64. I have considered the supporting information submitted by BDW Trading Ltd (00755) and note that the site is in the same ownership as the adjacent allocated site (HSG 21). I

have also considered the additional submissions made through the April 2016 further information requests. I note that the council's Green Belt Study 2008 (stage 2 on page 59) refers to the partially fragmented landscape influenced by transport corridors and electricity transmission lines. However, I also note the study concludes there is no landscape capacity for development and that there are important views across the site from Broomhills Road towards the Pentlands and to the policies of Mortonhall.

65. The character of the area will undoubtedly change through development of the adjacent site at Broomhills. However the existing tree belt along Broomhills Road screens the adjacent site. I consider the road will retain a rural character even when HSG 21 is developed. Wider views in the context of the setting of the city are influenced by the line of the pylons. However, there are no other existing features to create any sense of enclosure or to distinguish the site from the remainder of the green belt. The pylon line does not follow any established feature and a new boundary would take a considerable time to establish. I find that the B701 in this vicinity provides a clear tree lined boundary between the urban area and the surrounding countryside. This contributes to the landscape setting of this local area and the city.

66. The representation suggests an alternate boundary along the bypass. However, I consider the larger extent of land between the site and the bypass merits retention in the green belt as it forms part of a wider wedge of green belt extending into the city from the bypass towards the policies of Mortonhall. This is important in terms of the landscape setting of the city.

67. In assessing this site, I am inevitably drawn into a comparison with other sites the council has considered suitable for inclusion. The pressing need for housing land and acceptance that this will require urban edge locations has required reconsideration of green-belt boundaries. In some cases the council has promoted new boundaries. I accept that in some instances the advice of Scottish Planning Policy (paragraph 51) to follow clearly identifiable visual boundary markers based on landscape features such as rivers, tree belts, railways or main roads has not always been followed. However, I consider this can be justified in certain circumstances where there is some sense of containment or a lack of a better alternative and where the site can otherwise be accommodated without an unacceptable impact on green belt or landscape objectives.

68. The developer's submissions reference the establishment of structural tree planting along the south-west boundary of the site close to the pylon line would serve to limit the developable area on this edge of the city. However in this area I consider the natural and defensible boundary is along Broomhills Road as included in the proposed plan. I also consider development of this site would detract from the proposed recreational route and landscape enhancement along Broomhills Road which is intended to function as the green belt boundary and would enable pedestrian and cycle access within an attractive rural setting.

69. Added to my concerns about loss of this site from the green-belt my conclusions above reference a lack of detail as to the sufficiency of any proposed mitigation. The responses of the council and Transport Scotland fail to provide me with sufficient clarity that the cumulative effects of further development in South East Edinburgh could be fully addressed in accordance with the requirements of SESPlan. Representations on the adjacent site, as included in the proposed plan, evidence considerable local concern about traffic impact including at Kaimes junction and the failure to take into account the extent of proposed development in Midlothian.

70. My conclusion is that the site should not be included in the plan or deleted from the green belt. I find that development of the site would run contrary to green belt objectives as it would not maintain the identity and character of the city, that it would fail to establish an appropriate green belt boundary and that there is remaining uncertainty about how cumulative and cross boundary transport impacts would be addressed. My conclusions on the shortfall in the land supply are not sufficient to overcome these concerns.

South of Liberton Drive

71. The land was assessed under 'South of Liberton Drive' in the Environmental Report - Second Revision, Volume 2, June 2014 pages 62-64 and page 64 of Volume 1. The site has a strong sense of enclosure due to the woodland edge to the south and a boundary to the west which is contained by the wooded policies of Liberton House and its walled garden.

72. In some respects the site offers potential for a relatively small scale housing development affording good integration with the urban area and an accessible location. My main concern relates to the setting of the listed building. I note that the supporting submissions (Land Options East, June 2013) show a layout which retains the land north-east of the walled garden as open space to protect the setting of the house when viewed from Liberton Drive. This achieves a relatively low density of development with an indicative capacity of around 70 houses. However, this does not address issues relating to the retention of a rural setting of the listed building when viewed from Alnwickhill Road. I consider the field retains an open foreground in views towards the listed building and that this rural setting is an important part of the character and setting of the house and its walled garden.

73. My conclusions are supported by the response of Historic Environment Scotland through my April 2016 further information requests. It states that the original setting of Liberton House was originally open land. It considers the land in question is an important buffer from encroaching twentieth century development. It allows open views to the house and its estate from the eastern approach, whilst affording open views across the site from the house itself.

74. On balance without the re-assurance of a worked up scheme to demonstrate protection of the setting of the listed building I am not persuaded that the site is suitable for inclusion in this local development plan. My conclusions on the shortfall in the land supply are not sufficient to overcome these concerns.

West of Liberton Brae

75. The developer's submissions indicate that a larger area of land was assessed by the council rather than the two smaller parcels of land identified as suitable for development through this representation. I have also taken into account further submissions in response to Further Information Request 30.

76. The green belt in this locality extends into the city and comprises land with extensive views over the city and its main landmarks. It is an area characterised by golf courses and recreational routes. The land in question slopes down from Liberton Road to Blackford Glen Road. It is characterised by Liberton Tower on the ridge and the distinctly rural character of Blackford Glen Road. The land remains in agricultural use.

77. Site one is a small parcel of land at the top of the ridge to the east of the Tower and comprises a flat paddock at the top of the slope. The second land parcel is contained between the existing housing on Blackford Glen Road wrapping around the Montessori Arts School to the back gardens on the prominent ridge along Leadervale Road.

78. The submitted proposals have done much to reduce the potential impact of development in this area by focussing on integration with the existing urban area and avoiding the steeper and more open areas of farmland. However the housing on Leadervale Road reflects a clear break in slope. Aside from the farm buildings associated with the school the strong rural character of the green belt is only encroached by a single row of houses along the A701 and terraced housing at the start of Blackford Glen Road. I consider the housing would be a prominent and visible extension into an area of green belt which makes a strong contribution to green belt objectives. The area is important in establishing an open setting for recreational routes and maintaining a long established rural setting in views towards a number of the city's landmark features. The developers submissions indicate a robust defensible boundary could be established with significant landscaping in a similar approach that the council has taken for many of the sites within the Second Proposed Plan. However I am not persuaded that this would address my concerns above.

79. The other smaller site would impact on the rural setting of Liberton Tower. I consider this is a landmark feature within a rural landscape setting. The Buildings of Scotland describes the tower as having a 'splendid south panorama of Edinburgh' whilst noting that 'suburbia barely keeps its distance'. The proposed housing site, currently a field in agricultural use, is to the immediate east of the tower complex. The tower is immediately visible when approaching the site from the east after the housing on Liberton Drive. There are clear views across the proposed site of the four-storey (and parapet) tower which rises considerably above the later farm buildings. In its submission to the examination Historic Environment Scotland states that twentieth century housing development from the east has encroached on this open setting, but the proposed site still gives a sense of the tower rising from its ancillary buildings within an open rural setting. It goes onto say that "The development of the field for housing would have a serious impact on the, still open, setting of the tower." I consider the site is also important in enabling views to the city skyline.

80. Reference is also made to a parcel of land to the south of Liberton Drive around the Tower Farm Riding stables and this is assessed through Issue 2 in relation to its retention within the green belt.

81. In conclusion, I do not consider these sites could be included as housing proposals without significant compromise to the landscape setting of the city and the recreational enjoyment of this area. In addition development in the paddock would compromise the setting of a listed building. There is clear conflict with green belt objectives and with the requirements of SESplan Policy 7 and 12. In any event even if my conclusions on green belt had supported a redrawn boundary my uncertainty about cumulative impacts particularly in relation to transport would not have supported a recommendation to include these sites. I do not consider the identified difficulties in timeous provision of the SESplan housing target provide sufficient reason to include these sites.

<u>East of Burdiehouse</u>

82. The site to the north is already allocated in the proposed plan. There is an extant

planning permission and construction has commenced. This proposal would extend the identified HSG 22 site further to the south up to Lang Loan. This would accommodate an additional capacity of circa 120 units taking access from Lang Loan.

83. The site slopes up from the proposed green belt boundary. The proposed plan shows the current green belt boundary to run along the lower slopes aligned below the 135 metre contour and subject to a substantial planted boundary. I understand this was designed to minimise impacts on the northward views towards the city and the city's southern skyline including the Old Town Ridge and Arthurs Seat. The green belt in the area to the east was previously established by the planting along the edge of the existing housing at the Murrays.

84. I have considered the conclusion of the reporters at the last local plan inquiry who considered housing should be contained in the area to the north and that the extension of the planting from the Murrays would result in a defensible long-term green belt boundary. They also considered that proposed vehicular access onto Lang Loan – " would have unacceptable landscape and visual impact. The width of a road and pavements, along with the necessary street lighting here would inevitably compromise the rural setting and would be contrary to the key design aim of providing a countryside setting for the urban area. We would also be concerned that there may be significant visual changes to the landform in order to achieve the gradients and geometry requirements of an adopted road."

85. I consider that much of the rationale for the reporters' findings on the previous local plan was based on providing a continuity in the urban edge following the contours and planting already established at the Murrays and avoiding the higher ground along Lang Loan which maintains a rural character and an open outlook towards the city.

86. Following publication of this proposed plan the circumstances relating to the establishment of a defensible boundary on this urban edge have changed. Appeal decision PPA-230-2152 effectively alters this boundary by accepting the principle of development between the Murrays and Lang Loan (as explained in my conclusions below on the site referenced in representations as North of Lang Loan.)

87. The council's assessment of this proposed extension to HSG 22 as set out in the Environmental Report Addendum states that:

"Development of this site would weaken the existing green belt boundary established at 'The Murrays' where development is set below the 139 m contour and enclosed by a 50 metre wide tree belt. Development would also lie beyond the structure planting required by condition as a result of Planning Appeal ref: PPA-230-2047, which extended the planting at the Murray's westwards to Burdiehouse Road. Both features establish strong containment to the urban area and in the case of proposed allocation HSG 22, a strong landscape edge for new development. The site also lacks opportunities for physical integration with the existing urban area."

88. It is notable that in his conclusions on PPA-230-2152 (the neighbouring site to the east) the reporter stated that:

"Whilst the loss of these views would be a negative factor associated with the proposed development, it would primarily affect motorists using Lang Loan. There is no evidence before me to indicate that this road is heavily used for recreational purposes (there are,

for instance, no footways along it) and, thus, that the obstruction of the views across the site would represent the loss of a locally valued feature. In time, these views would be replaced by that of a mature tree belt which, whilst different, would be attractive in its own right"

89. I have also considered the conclusions of the 2008 Green Belt Study in terms of the potential landscape impacts of development on this edge of the city. The section on page 63 and the accompanying map indicate Lang Loan could provide a strong containing ridge that could be accentuated by woodland planting. This edge is referenced as a new settlement edge placing the emphasis on the south facing slopes to the west of Lang Loan to contain and maintain the setting of the city. The study refers to woodland planting enhancing the containment of south-facing slopes although some open views from the Lang Loan should be retained.

90. Whilst I understand that the council has carried out a new assessment of sites through this local development plan, including assessment against green belt objectives, I consider this study is still helpful in setting a context for the assessment of landscape impact and a strategic view of green belt boundaries. I consider it is relevant in providing some support for a new green belt boundary extending along Lang Loan. The overall recommendation in relation to the area referenced a "B" on the accompanying map states that housing could also be located on north-west facing slopes of the Burdiehouse Burn with woodland planted along the northern edge of the Lang Loan to strengthen the new settlement edge.

91. I recognise the site provides a foreground in views over the city from Lang Loan and it presents design challenges in terms of slope, elevation and orientation. However the site is unused and on my site visit I found evidence of fly tipping. There is no public access. Enjoyment of the view is restricted to motorists on Lang Loan as there is no pavement. The integration of the site with housing to the north would have to be carefully handled given the current requirement for structural planting along the northern boundary of HSG 22.

92. I consider that sensitive layout and design, working with the slope and enabling view corridors through the site to key landmarks, could be combined with improved pedestrian and cycle access within an appropriate landscape framework. I consider this would serve to enhance this urban edge and that an effective and long term green belt boundary could then be established along the ridge marked by the line of Lang Loan. This would enable continuity with the newly established green belt boundary along Lang Loan to the east of the site. Representation on this site suggests a new boundary could be created to the west. Initial submissions show this aligned with the existing access track (referenced as T8 on the proposals map for the proposed plan). This is reflected in the council's map of the site (2279). Later submissions through Further Information Request 30 show an indicative development including a further area to the west of the access extending development out to the line of the pylons where the existing green belt becomes markedly narrower. I note the submissions in support of the site reference a minimum of 20 metres planting along Lang Loan and along the western boundary. I return to this matter below.

93. My conclusion with regard to landscape issues and green-belt objectives is that there would be an impact on views to the city skyline from Lang Loan but that this could be mitigated to an acceptable level without compromise to wider green belt objectives. I consider there are opportunities to enhance recreational access and deliver localised landscape enhancement.

94. The council raises concerns about the accessibility of the site scoring less well than sites already included in the plan. However comparison with housing directly to the north, or indeed on the proposed site to the east, indicates only a marginal decrease in accessibility to local services and existing bus infrastructure if appropriate linkages/integration can be secured. There is an existing albeit minor access track and whilst a new road layout and street lighting would inevitably result in a loss of rural character I consider that with appropriate layout and landscaping these impacts would not be unacceptable. The representation promoting the site refers to an additional access from Lang Loan providing an opportunity for buses to route through the site. It may be that the increased volume of housing and a secondary access point can facilitate such improvements in public transport accessibility. Certainly these are principles that should be fully explored if the site is to be progressed.

95. However all of this is set in the context of my conclusions above on cumulative education and transport impacts and a lack of certainty as to the sufficiency of any proposed mitigation. The council and the promoters of the site suggest that the site, like its neighbours, could have been considered as part of the proposed cumulative contribution zone for education and transport. However, drawing on the conclusions in Issue 19 the responses of the council and Transport Scotland fail to provide me with sufficient clarity that the cumulative effects of further development in South East could be fully addressed in accordance with the requirements of SESPlan. Having assessed all the relevant information there is nothing to suggest an unacceptable environmental impact however there has been no formal assessment against SEA objectives. Whilst I sought the views of those who raised representations on adjacent sites this evidence of public consultation does not compare with that which would apply to sites progressed through the plan process or as required through the planning application process.

96. That said my conclusions above recognise the opportunity to rationalise the green belt boundary in this area and provide for further growth should this be required and justified in the context of SESPlan and Policy Hou 1. This is an area of significant change and the green belt boundary should be robust in the longer term. Whilst the green belt has a role in containing development and encouraging regeneration I do not consider that its boundaries should be drawn too tightly in circumstances where there is a clear alternative boundary which could be established without significant compromise to green belt objectives. There is an identified shortfall in the land supply and SESplan Policy 12 states that green belt boundaries should ensure that strategic growth requirements can be accommodated.

97. My conclusion is that, whilst the site is not suitable for inclusion as a housing site through this examination there is a strong justification to redefine the green belt to follow Lang Loan. I consider there is rationale, given the terms of Scottish Planning Policy to continue the green belt boundary along Lang Loan to Burdiehouse Road. However, I am conscious that the green belt is narrow at this location close to the boundary with Midlothian. The green belt boundary extending immediately to the east of Burdiehouse Road is already established through the requirement for a landscaped edge directly to the north of the pylons.

98. Continuing to wrap the green belt boundary around the woodland associated with the Lime Kilns as shown in the proposed plan provides for its continued protection and function as part of a green corridor extending through to the south of the Murrays. Enhanced landscaping between the existing access track and the pylons as part of any future development would enable a depth of green belt appropriate to fulfil the function of

preventing coalescence with development in Midlothian. This would also provide a feature on the ground which can be enhanced by future landscaping as part of this recreational access route. A strong landscape edge would be required to provide a context for any further development. Despite the progress of adjacent sites through the planning application process I consider there would be an opportunity to establish a strong and yet permeable landscape structure between any further extension to Burdiehouse, its first two phases and the site referenced below as Lang Loan.

99. I appreciate that parallels are likely to be drawn between my conclusions here and those above on Frogston Road East and I accept that the southern boundary of HSG 22 is marked by the pylon line and the need for future landscaping. However I consider the circumstances here are different given the nature of the green belt in this location, the need to integrate the site as far as possible with the landscape structure already established for HSG 22 and the more robust boundary established along Lang Loan. Use of the access track as the western boundary is not ideal and would require significant landscape enhancement over time. However, I consider this boundary is justified given that it enables retention of an adequate buffer between this settlement edge and development in Midlothian.

100. Drawing on all of the above my conclusion is that whilst I do not consider that allocation as a housing site can be justified at this time there is an opportunity to rationalise the green belt boundary and to provide flexibility for some further growth if this were to be justified through further detailed assessment.

Lang Loan

101. This site directly to the east of that assessed above was subject to a recent appeal decision (PPA-230-2152). A notice of intention to grant planning permission in principle has been issued. As referenced above planning permission on this site would effectively establish a new green belt boundary along Lang Loan to replace that currently established by planting to the south of the Murrays.

102. A Transport Assessment submitted with the planning application concluded that the Lasswade Road/ Gilmerton Dykes Street/Captain's Road traffic light-controlled junction would operate significantly over capacity, with only four years of traffic growth taking account of committed developments identified in this plan. The intentions notice indicates the need to increase the capacity of this junction.

103. Circumstances have overtaken my consideration of the principle of development on this site as there is now an intention to grant planning permission in principle. However, matters of detail including the cycle and footpath network remain to be addressed and there will be an opportunity to address integration between neighbouring housing areas. This could be included as development principles were the site to be included in the plan.

104. In order to provide clarity and a consistent approach between sites I consider this site could be grouped under an expanded Broomhills and Burdiehouse Site Brief. This enables transparency about the extent of allocated land within a newly defined green belt. Inclusion in the plan achieves greater clarity about the extent of planned development in the locality and the consequent revision to the established green belt boundary. For these reasons I consider it is appropriate to add it to the list of new housing proposals for South-East Edinburgh in Table 4. The site and the development principles would also then be added to the Broomhills, Burdiehouse (and Lang Loan) development brief. The

submissions to my further information request 30 provide further details including on Strategic Environmental Assessment(SEA). This supports my view, drawing on all the relevant information, that there unlikely to be any significant impacts when assessed in terms of a SEA objectives. The site has been subject to public consultation through the planning application process.

105. I note that the council and promoter of the site consider that the site, subject to the grant of planning permission, is more appropriately retained as "windfall" as it meets this definition. I disagree. It is a site suggested in representation to the proposed plan. Whilst my assessment has been overtaken by events it remains a site open to consideration for inclusion in the plan. I consider that the plan should reflect the up to date position. Inclusion in the plan along with the other sites identified in south-east Edinburgh provides greater clarity and certainty.

North of Gilmerton Station Road

106. This is another site that has been subject to a recent appeal (PPA-230-2137). This decision establishes the principle of the site referenced as HSG 24 with a further extension to include 17 hectares of land to the west. This matter is addressed through my conclusions and recommendations on Issue 9. This change would add a further capacity of up to 160 houses. My conclusion on that Issue supports extension of the site as proposed in representation and as reflected in the recent appeal decision.

107. I note other matters raised in representation on this site regarding the lack of clarity surrounding the council's proposed options for schools delivery as the Action Programme sets out more than one option. There is also concern that the approach to developer contributions may raise issues relating to financial viability. These concerns reflect those raised in Issue 21 where I recognise the need for Supplementary Guidance to be prepared in the context of a revised Policy Del 1 and recommend inclusion of General Development Principles.

108. For the current planning application I understand that matters relating to developer contributions have now been agreed and planning permission has been granted. However, I consider the matters raised regarding uncertainty and viability provide further justification for my recommendations through Issue 21. In addition the consequent reconfiguration of the proposed green belt boundary has a bearing on my consideration of the adjacent suggested housing site at Lasswade Road as considered below. This is accepted in the council's response to Further Information Request 30. My recommendation through Issue 9 is to include this site as an amendment to HSG 24.

Lasswade Road

109. The site is within the North of Gilmerton Station Road Assessment Area as identified in the council's Environmental Report Second Edition. The site extends to 12.5 hectares and is estimated to accommodate circa 160 homes. It would occupy an area of land extending the proposed HSG 23 to Lasswade Road towards Gilmerton Station Road but avoiding development on the lower parts of the slope. I have considered all the detailed submissions on this site including those submitted in response to further information request 30.

110. These south facing slopes do have a role in providing a setting on this urban edge and creating a clear distinction between urban and rural. However with careful layout,

design and landscaping I do not consider that development here would significantly compromise green belt objectives or result in an unacceptable extension to the urban area. The site is in agricultural use so opportunities for recreational access are restricted. The area is relatively close to Midlothian but the green belt would in my view still enable adequate separation between settlements. Consequently, I do not consider that loss of this site would significantly compromise green belt objectives particularly when considered in the context of proposed development on adjoining sites. With the proposed extension to HSG 24 to the north east I consider there would be potential to achieve linkage through all three sites subject to a cohesive landscape framework. I accept the site would be well placed to access the proposed new primary school on HSG 24 and contributions could assist in its delivery if this option were to be pursued. There is a remaining uncertainty about a preferred schools solution for South East Edinburgh and the council has identified a funding gap based on the amount of housing already identified on sites in the proposed plan or which are otherwise progressing through the planning system. I note the submissions in support of the site state that developer contributions could enable the necessary provision

111. The green belt between Midlothian and Edinburgh is relatively narrow in this location. As discussed above the principle of establishing new structural landscaping to achieve a new green belt boundary has been established elsewhere. However, as advised by Scottish Planning Policy a logical boundary will usually require a topographical feature or boundary such as a road so that an effective long term boundary can be established.

112. I consider there would be an opportunity to link the landscaping frameworks of all three adjacent sites. A logical green belt boundary would point to a continuation along Gilmerton Station Road. However, I note the references in the submissions to the relatively higher landscape sensitivity of the land to the south of the proposed site. I am also conscious of the revision that will extend the green belt boundary to the west along Lang Loan. A woodland responding to the contours of the slope and the adjacent landscaping proposals on HSG 24 would soften this urban edge and provide a landscape setting that is currently absent on the exposed urban edge along the ridge at Gilmerton Dykes Road. I return to the appropriate establishment of a green belt boundary below.

113. The site is accessible to public transport and in walking distance to local facilities. Development would assist in connectivity between the adjacent housing site at Gilmerton Station Road and the bus services along Lasswade Road. The council accept the potential; of the site in the context of an expanded HSG 24, through its response to my April 2016 further information request.

114. However all of this is set in the context of my conclusions above on cumulative education and transport impacts and a lack of clarity as to the sufficiency of any proposed mitigation. The council and the promoters of the site suggest that the site, like its neighbours, could have been considered as part of the proposed cumulative contribution zone for education and transport. However, the responses of the council and Transport Scotland fail to provide me with sufficient clarity that the cumulative effects of further development in South East could be fully addressed in accordance with the requirements of SESPlan. These matters are further detailed through Issue 19. Having assessed all the relevant information there is nothing to suggest an unacceptable environmental impact and I note this conclusion corresponds with additional submissions that present the developers assessment against SEA objectives. Whilst I sought the view of those who raised representations on adjacent sites this evidence of public consultation does not

compare with that which would apply to sites progressed through the plan process or as required through the planning application process.

115. That said my conclusions above recognise the opportunity to rationalise the green belt boundary in this area and provide for further growth should this be required and justified in the context of SESPlan and Policy Hou 1 or through the next development plan. This is an area of significant change and the green belt boundary should be robust in the longer term. The green belt has a role in containing development and encouraging regeneration but I do not consider that its boundaries should be too tightly drawn in circumstances where there is a clear alternative boundary which can be established without significant compromise to green belt objectives. There is an identified shortfall in the land supply and SESplan Policy 12 states that green belt boundaries should ensure that strategic growth requirements can be accommodated. Inclusion of this land in the urban area clarifies that its release would not run contrary to green belt objectives. It should also enable a more integrated approach to future development for the area as a whole.

116. My conclusion is that, whilst the site is not suitable for inclusion as a housing site through this examination there is a strong justification to redefine the green belt in this area. As stated above there is rationale, given the terms of Scottish Planning Policy, to establish the new boundary to continue along Gilmerton Station Road and along Lasswade Road. However the green belt is relatively narrow in this location and the developers submission show the potential for a community woodland to establish a robust new green belt boundary. Over time I consider this offers integration with the landscape framework for the adjacent site but also linking through to the woodland to be established along Lang Loan. This would also protect the more visible and sloping lower slopes where development would be more prominent on approach from the south and from the bypass.

117. Drawing on all of the above my conclusion is that whilst I do not consider that allocation as a housing site can be justified at this time a new green belt should be established to follow the site boundary as referenced in the submissions. This is required in order to rationalise the green belt boundary and to provide flexibility for further growth if this were to be justified through further detailed assessment.

Drum (North) and South)

118. The council has included HSG 28 The Drum as a housing site (see Issue 9). This forms only a small contained part of the policies and designed landscape associated with this Category A listed country house. The wider site including the designed landscape includes a number of other buildings listed as Category B and C.

119. I have carefully considered the supporting information provided by SEEDCO which assesses the potential for further development within the wider site. I have also considered the further submissions in response to Further Information Request 30. These support its conclusion that the area has capacity to absorb further significant housing development without undermining the importance of the estate policies overall. The area described as the Drum North effectively reflects the area designated in the Inventory of Designed Landscapes entry. The area described as Drum South is a more open area of agricultural land extending to the line of the bypass. It has some sense of enclosure through planting along its outer boundaries and a tree belt to the south along the bypass. I note that the eastern boundary of this area would adjoin the Shawfair

Business Park (Midlothian Council).

120. I share the council's concern that whilst the submitted assessment has identified parcels of land based on reducing the impact on the landscape and the setting of the listed buildings this does not fully address the overall loss of the character and quality of the estate policies and the value of their currently intact qualities. As noted in the Inventory, the Drum's 'policy woodlands make a significant contribution to the surrounding scenery', being visible from arterial approaches and elevated viewpoints in the south of the city.

121. The conservation plan focusses on parcels of land where it is considered there is capacity for development. However, I consider there is a lack of detail as to how a coherent urban scale of development could be accommodated and integrated into the urban area as a sustainable location for housing. This would require consideration of connectivity to the urban area including by walking and cycling and to public transport provision rather than simply showing how pockets of housing can be accommodated within this landscape. I agree with the council that the farmed estate to the south and its associated boundary treatment provides a wider setting to the estate and its historic environment. In turn I consider this makes a valuable contribution to the setting of the city However, I acknowledge that the site benefits from potential access to bus stops on the A7 Old Dalkeith Road and the Shawfair Park & Ride which adjoin the site.

122. My conclusion above is supported by Historic Scotland in its letter of 28 June 2012. It states that the submitted Conservation Plan is carefully considered and welcomes plans for the repair, restoration and conversion of elements within the designed landscape. However it goes onto express concern that the areas identified with development potential, when considered together, would not address the value to be placed on these open areas- in maintaining a single intact composition of national importance.

123. The submissions state that procedurally, the Action Programme-based approach to identifying and managing infrastructure enhancements can still be used even if a number of additional sites were to be included in the Local Development Plan. However, the site as a whole would be a strategic scale of land release which I consider could have significant cumulative impacts on infrastructure. In the absence of detailed assessment I have insufficient clarity that these impacts could be addressed.

124. With the exception of the site identified as a reasonable alternative through the main issues report the representation has not requested that I assess the potential for inclusion of individual parcels of land for inclusion. Rather it suggests that the Drum site should be allocated as a whole for residential development. I accept that there may be some limited potential for housing if this were to enable restoration and improvement of the historic fabric of the estate. However, I consider this type of development is more appropriately considered through the development management process where the relevant detailed considerations can be appropriately assessed. My conclusion is that aside from HSG 25 the wider proposals for the Drum do not merit inclusion in this local development plan.

125. Turning to the site identified as a reasonable alternative in the Main Issues Report. It falls outwith the identified Historic Designed Landscape. However, I consider that the northern part of the site is clearly associated with the landscape setting of West Drive and this is accepted in the submitted Conservation Plan. The access to the estate and its landscape context would have to be retained and in my view only a relatively low density

of housing could be achieved to retain this setting and achieve a sensitive layout. Historic Environment Scotland through its letter of 2012 supported inclusion in the Main Issues Report as a reasonable alternative subject to recognition that any development would need to be of a low density and mitigated through the use of planted buffering. Inclusion of the site would result in a new green belt boundary along the line of the old railway-line where there is an established woodland setting. There is also potential to establish a new boundary along the wooded edge of the historic designed landscape.

126. However, I consider inclusion of this site involves some considerable compromise to the rural setting of the estate policies and the approach to West Drive when balanced against only a relatively small contribution to the housing land supply. I consider West Drive is more appropriately retained within a continuous green belt to the east of HSG 25. This would enable the continued retention of the established setting of all the countryside facing boundaries to this Historic Designed Landscape. Containment of all the wooded policies and the rural setting of West Drive within the green belt reflects the important contribution the estate and its polices make to the landscape setting on this edge of the city. For this reason I do not consider the site is suitable for inclusion as a housing site in the proposed plan or that the green belt in this location should be modified. I note that further submissions compare this site favourably to others that are included in the plan. However I consider the green belt here is important to the setting of the city due to its established and mature landscape framework and the value to be attached to the setting of the historic landscape. In any event even if my conclusions on green belt had supported a redrawn boundary my uncertainty about cumulative impacts particularly in relation to transport would not have supported a recommendation to include this as a housing site.

127. My conclusions on the shortfall in the land supply are not sufficient to overcome these concerns.

South East Wedge (North)

128. The site as proposed in representations is effectively split into two sections north and south. The northern portion is bound by a new housing development (Greendykes) currently under construction to the west, the A6106 (The Wisp) along the eastern boundary and a row of single storey cottages and a timber yard to the north. The northern site has full planning permission granted on appeal by Scottish Ministers (PPA-230-2129).

129. The planning permission establishes the principle of development on this site and the required contributions for education and transport in so far as they relate to this application. On this basis I consider that it would be appropriate to add it to the list of new housing proposals for south-east Edinburgh. For the sake of transparency I have assessed the site on the basis of the design principles that should apply and any required mitigation taking into account the terms of the planning permission. . The integration of the site with the green network, footpath and cycleway links and internal layout are important development principles in the context of this site.

130. I understand that the site would fall to be assessed as part of the Castelebrae Education Zone as outlined in the most recent action programme. It clearly relates to the existing HSG 18 site. However, there may also be merit in grouping this with the site to the south at Edmonstone. Given the scale of the proposal I have no evidence of any potential cumulative transport contributions and note that this was not a matter raised at

appeal.

131. From the submissions to the examination I note the potential archaeological interests on the site, potential ground condition and contamination constraints and that there is potential to maintain a green-space link on the western boundary of the site. I consider the green space link is an important element reflecting the importance of this wider area in maintaining a green space network and recreational access for the wider area. It will also be important that a design and layout is achieved to achieve effective integration with the adjacent residential areas including New Green Dykes. My recommended development principles reflect these considerations.

132. Whilst the council initially considered the site should be included as windfall it has since changed its view and indicated it should be included in the plan. This is consistent with the view expressed by the promoters of this site. However one other party maintains the view that this and other similar sites are more appropriately counted as windfall. As for other sites referenced above the site is proposed through representation, it is within the Strategic Development Area and outwith the existing urban area. In the interests of clarity and consistency I consider it should be included as a housing allocation.

133. The council directs me to a consequent change to the green belt north of the site which would become dislocated from the rest of the green belt and which would not then meet green belt objectives. I see from the proposals map that the allocation of this site leaves the green belt to the north without any continuity through linkage with the wider area. I accept that this would then no longer comply with green belt objectives and that a consequential change would be required to ensure a consistent approach to green belt designation. For these reasons I agree with the council that the area to the north should be identified within the urban area rather than as green belt. My modification reflects this.

134. I have assessed the remainder of the land to the south separately. It is identified as green space and green belt on the proposals map. Whilst the planned open space will be substantially reduced by the housing allocations to the north and south this site forms part of a continuous green wedge running from the wider green belt westwards between Greendykes and the Bioquarter. I consider that its retention is important in providing open space and recreational routes connecting through these areas.

135. Development of this site would effectively dislocate the green belt to the west with the wider countryside in Midlothian to the east. I consider this would be to the consequent significant detriment to green belt objectives. Whilst development at the Wisp results in a consequent change to the green belt to the north I consider the circumstances for this site are different given that the objective of open space proposal GS4, South East Wedge Parkland is described as multifunctional parkland, woodland and country paths linking with parallel developments in Midlothian. The site forms part of the city's green network in the Open Space Strategy and secures a green link through to Midlothian . Development of the sites to the north and south will accentuate the importance of this remaining area in maintaining continuity of this green corridor and its contribution to green belt objectives in terms of recreational access. Consequently I do not consider the site should be identified for housing and that it should be retained in the greenbelt and as open space.

<u>South East Wedge (South)</u>

136. I note the appeal decision by Scottish Minsters in relation to this site (PPA-230-

2131) where planning permission in principle was granted subject to conditions and following satisfactory conclusion of a legal agreement. The reporter's report, the conditions attached to the permission and the supporting legal agreement address the matters raised by the council.

137. The planning permission in principle effectively establishes the principle of development on this site. On this basis I consider that it would be appropriate to add it to the list of new housing proposals for south-east Edinburgh. The details of layout and design remain to be addressed and I have assessed the site on the basis of the design principles that should apply. Site specific transport mitigation is considered through the terms of the planning permission. My understanding is that the school would fall to be assessed in terms of similar cumulative education considerations as referenced above for Gilmerton. For this reason it appears sensible to include the site within the Gilmerton Site Brief where the General Development Principles set out through my recommendation on Issue 21 would apply.

138. The integration of the site with the green network, footpath and cycleway links and internal layout and design remain important principles to be addressed at the detailed planning stage. From the submissions I note issues of archaeological interest, retention of open space, protection of the site's historical landscape character and appropriate boundary treatment. My recommendations include development principles in relation to all these matters

139. Some doubt is expressed by council officers regarding the effectiveness of this site due to the identified constraints of significant undermining. I note that similar constraints apply to HSG 29 and these constraints are considered in some detail through Issue 10 where our conclusions support the council's view that the site is capable of becoming effective over the plan period. Whilst the detail of programming will be a matter for subsequent audits to address I find no reason to conclude that the site is not capable of becoming effective over the plan period.

140. I note the views expressed through the capital coalition motion. However, whilst I accept that the decision adds to the land supply, I find no basis to offset this addition against some of the capacity of Brunstane HSG 29 (Issue 10). Our conclusions on Brunstane are set out in Issue 10 but Issue 5 identifies a shortfall in the land supply. I find no basis to conclude that the anticipated contribution from this site replaces the need for allocations elsewhere.

Conclusion

141. I recognise that inclusion of further land in the Strategic Development Areas could have helped address the identified shortfall in the land supply. This may have enabled greater certainty for the council and others, within the framework set by revised Policy Del 1, to come to a view on the scale of additional impacts and to detail the approach to infrastructure delivery through its Supplementary Guidance. However my revisions to Policy Hou 1 set out an approach to consider sites which might be anticipated to come forward in accordance with this policy.

142. For those sites recommended for inclusion below a consistent approach to the required mitigation, as for sites already included in the proposed plan, is applied by the inclusion of development principles. These reflect the terms of any planning permission but also seek to apply consistency with matters relevant to adjacent sites and any

redefined green belt. General Development Principles (see Issue 21) which apply on an area wide basis are also of relevance.

143. The sites recommended for inclusion have all been consulted on through the planning application process. I am satisfied that I have sufficient environmental and other information to recommend inclusion within the policy context of the plan and subject to the stated general and site specific development principles. Submissions from Scottish Natural Heritage and Historic Scotland reference the SEA process and the need for the requirements of the legislation to be met prior to adoption of the plan. It will fall to the council to carry out the appropriate formal Strategic Environmental Assessment of these modifications prior to adoption of the plan.

Reporter's recommendations:

1. Add the following to table 4 New Housing Proposals

Under the heading South- East Edinburgh (the text in italics is for reference only and not for inclusion in the plan)

South East Wedge South: Edmonstone (*PPA-230-2131*)
Site Area (council to insert)
Estimated capacity 170- 370 units

South-East Wedge North: The Wisp (*PPA-230-2129*)
Site Area 2.29 hectares
Estimated Capacity 71 units

North of Lang Loan (*PPA-230-2152*)
Site Area 14.1 hectares
Estimated capacity 220 houses.

2. Amend paragraph 117 to reference the additional sites in South East Edinburgh.

3. Amend the proposals map and the Broomhills and Burdiehouse site Brief and accompanying map to include North of Lang Loan. The boundaries for North of Lang Loan are as shown through PPA-230-2152.

4. Amend the proposals map and the Gilmerton Site Brief to include the expanded HSG 24 (From Issue 9) and the additional site referenced above as Edmonstone (*PPA-230-2131*) with consequent changes to the proposals map. The site boundaries should reflect those in the relevant appeals.

5. Amend the proposals map and either the Newcraighall and Brunstane Site Brief or the Gilmerton Site Brief to include the Wisp with the boundaries as shown through PPA-230-2129 with a consequential change to this map and the proposals map to remove the green belt designation in the area to the north of the Wisp.

6. Include new site briefs/development principles as follows:

7. In Part 1 Section 5- Edinburgh South-East: Rename the Broomhills, Burdiehouse site briefs as the Broomhills, Burdiehouse and Lang Loan Site Briefs

8. Include the following new site development principles:

Lang Loan (HSG X): Development Principles

- Address the General Development Principles on transport and education for South-East Edinburgh (as set out in paragraphs 118-120).
- Pedestrian and cycle links with the housing areas to the west and north of the site and along Lang Loan.
- Lasswade Road/ Gilmerton Dykes Street/Captain's Road Junction Improvement
- Upgrading of bus stops on Lasswade Road;
- Secure any required archaeological works
- Landscaping to achieve integration with adjacent housing areas and establishment of new green belt boundary along Lang Loan

The council should illustrate these development principles in map form as a part of a revised Broomhills, Burdiehouse and Lang Loan Site Brief.

9. Rename the Gilmerton site brief as Gilmerton and South-East and include the following site development principles:

Edmonstone (HSG X) – Development Principles

- Address the General Development Principles on transport and education for South-East Edinburgh (as set out in paragraphs 118-120).
- Traffic signals at the Wisp/Old Dalkeith Road
- Speed limit restrictions on the Wisp
- Create a development layout that retains and enhances any elements of historic landscape structure
- Incorporate sizeable areas of open space and parkland and retain views and open aspects to the south and east;
- Ensure the visual separation from Danderhall through sensitive design and screen planting;
- Integrate a network of footpaths, cycleways and open space to be part of the wider Green network
- Ensure appropriate grouting and mine entry treatment works are carried out prior to commencement of development.
- Achieve additional boundary planting along both road boundaries
- Address required local road and footway improvements and mitigation measures
- Secure any required archaeological works

The council should illustrate these development principles in map form as a part of a revised Gilmerton and South-East Site Brief.

The Wisp (HSG X) – Development Principles

- Address the General Development Principles on transport and education for South-East Edinburgh (as set out in paragraphs 118-120).
- Ensure appropriate grouting and mine entry treatment works are carried out prior to commencement of development.
- Secure any required archaeological works
- Design and maintenance schedule to secure the green-space link on the western boundary of the site

- Pathways and cycle routes both internally and connected to the proposed development.

Note : The council should illustrate these development principles for the Wisp in map form either as part of a revised Gilmerton and South-East Site Brief or alternatively as part of the Newcraighall and Brunstane Site Brief.

Green Belt

10. The boundary of the Green Belt should be extended along Lang Loan to include the site referenced above as Lang Loan and to follow the western boundary of the site referenced above as East of Burdiehouse (boundaries as shown on council map 2279). This new green belt boundary should follow the existing access track (referenced as T8 on the proposals map) then wrap around the north of the woodland associated with the Lime Kilms before following the southern boundary of HSG 22 through to Burdiehouse Road. With the exception of inclusion of the housing site at Lang Loan the remaining area between the urban edge and the green belt should not be identified for development at this stage but should be included in the settlement boundary.

11. The boundary of the green belt currently shown to the south west of HSG 24 and to the south-east and south-west of HSG 23 should be extended so that the land associated with the site referenced above as Lasswade Road is deleted from the green belt (boundaries as shown on council map 2281). The land on the urban edge within the new boundary should not be identified for development at this stage but included within the settlement boundary.

12. The new green belt boundary should also reflect changes at Edmonstone and the Wisp as referenced above.

Note: A recommendation on expanded HSG 24 North of Gilmerton Station Road with a net increase of 160 units is included in Issue 9

Issue 15	**Suggested Housing Sites Outwith the Urban Area – North West**	
Development plan reference:	**Table 4 pages 25 – 27** **Proposals Map**	**Reporter:** Lance Guilford

Body or person(s) submitting a representation raising the issue (including reference number):

1133 Danzan 2003 Trust 1155 Trustees of the Foxhall Trust	2277 Hallam Land Management 2291 Defence Infrastructure Organisation

Provision of the development plan to which the issue relates:	Sites outwith the existing urban areas and not allocated for housing, which are being promoted by developers and landowners in their representations.

Planning authority's summary of the representation(s):

CONTEXT

All of these proposed housing sites were the subject of representations to the first Proposed Plan. Part of Craigiehall was the subject of a question to the Main Issues Report (Question 15 seeking opinion on whether to exclude settlements and major uses from the green belt).

Kirkliston East

- The Kirkliston East site should be removed from the green belt and allocated for housing in Table 4 of the Plan. There are no barriers regarding land ownership, no significant physical constraints which hinder viability, public funding would not be needed and there are no known infrastructure constraints. The site should be released from the green belt on the grounds that there are not enough effective brownfield sites in Edinburgh to meet SDP housing targets, the development could be integrated into its surroundings with minimal visual intrusion and that the landscape influence on the setting of Kirkliston is low according to the Edinburgh Green Belt Study. The development will include publicly accessible open space as part of any proposal and a green belt boundary along the eastern edge of Kirkliston East would provide a robust boundary through structured planting.

  In terms of transport matters, the proposal would be an extension to established paths and cycle ways from the Kirkliston North development. Regarding public transport, the proposal looks to include a bus gate similar to Kirkliston North that would enable this. The B9080 could carry a new access roundabout which would be the arrival point to Kirkliston and enable a connection to Queensferry Road. Furthermore, the B9080 could carry a further access point from existing routes that would make the whole area easy to access. **(1133 Danzan 2003 Trust)**

'Factory Field', Kirkliston

- States that this site should be included in the Plan as a new housing proposal. It

would not affect the landscape character, quality and setting of Edinburgh and neighbouring towns. Trees and other edge site planting provide a natural site boundary which could act as a new boundary to the green belt. By removing the site from the green belt, the site will become more accessible and connected to Kirkliston. Furthermore, any proposal would not cause coalescence with any nearby settlements. The site would also help to meet housing targets. **(1155 Trustees of the Foxhall Trust)**

Craigiehall

- Allocate land for housing led development at Craigiehall, North West of Cammo. Despite the significant land allocations within the LDP there remains a very significant shortfall. There is a finite quantum of development which can be delivered within the Strategic Development Areas in the short to medium term and therefore additional greenfield sites, outwith the Strategic Development Areas, are required. When considering the whole site, it meets the criteria of the housing site assessment set out in the Environmental Report. The 'Craigiehall Village' concept document sets out how a range of housing densities can be set out, taking account of site constraints, to accommodate over 1000 homes, with 250 completed within the Plan period. **(2277 Hallam Land Management)**
- The Ministry of Defence site at Craigiehall should be allocated for housing led development. This representation both consolidates and develops the earlier representations submitted previously by the Defence Infrastructure Organisation on the LDP Main Issues Report and March 2013 Proposed LDP. Considers that the land would contribute to the housing land supply (see also the representation considered under Issue 5). The site could contribute to the 'Special Economic Area' in West Edinburgh by redeveloping an existing brownfield site and providing a range of housing. Development could retain and enhance the estate's historic elements and landscape and be developed in a sustainable manner with links to employment centres. The Housing Site Assessment in the Environment Report in respect of Craigiehall should be amended. It is suggested that the site does meet the criteria in that assessment. The overall assessment should support the allocation of the site. **(2291 Defence Infrastructure Organisation)**

Modifications sought by those submitting representations:

Kirkliston East

- Allocate additional land for housing at Kirkliston East and removal of the land from the green belt. **(1133 Danzan 2003 Trust)**

'Factory Field', Kirkliston

- Amend green belt designation to the east of Kirkliston and re-designate 'Factory Field' as a housing proposal. **(1155 Trustees of the Foxhall Trust)**

Craigiehall

- Allocate land for housing led development at Craigiehall, North West of Cammo. **(2277 Hallam Land Management)**
- Allocate the Ministry of Defences land at Craigiehall for housing-led development.

(2291 Defence Infrastructure Organisation)

Summary of responses (including reasons) by planning authority:

Site selection - General

- The LDP must conform to the relevant provisions of the approved SDP and its Supplementary Guidance. These include a requirement for a generous allocation of housing land in the Council's area and the designation of a green belt around Edinburgh (SDP Policies 5, 7 and 12).

  In preparing the LDP, the Council has sought to meet the overall housing land requirement in ways which prioritise use of brownfield sites in existing urban areas and which minimise the loss of land from the Green Belt, in accordance with SDP paragraphs 113 and 130. The Council's response to the representations in Issue 5 explains why it is nevertheless necessary for this LDP to make significant new releases of greenfield land from the green belt at this time, and of the scale set out in the Second Proposed Plan.

  In selecting greenfield housing sites for release, the Council has sought to minimise the impact on greenbelt objectives and to secure long-term boundaries, in accordance with SDP Policy 12 and paragraph 130. To do so, the Council has assessed relevant greenfield land for its suitability in these terms. The site assessment process has gathered evidence on the relevant land on a systematic and consistent basis and presented its findings in a way which enables comparison and hence selection of those sites which are most appropriate. This approach has been informed by consideration of the findings and recommendations of the Report of Inquiry for the Edinburgh City Local Plan (pages 1-21 to 1-26).

  For the LDP the Council has set out the evidence of its housing site assessment in the project's Environmental Report, which also presents the statutory Strategic Environmental Assessment of the Plan. The method and criteria used in the site selection process are described in Volume 1 of the Environmental Report – Second Revision, pages 26-33. The site assessments are set out in Appendices 5-9 (Volume 2) and, for some sites, the Environmental Report Addendum. At each stage of the LDP project the Environmental Report has been revised and updated as appropriate to:
    - show what regard has been had to statutory representations received at the previous stage;
    - respond to changes in the SDP context to the LDP, which have required additional housing land to be found.

  The criteria used for the housing site assessment are set out in Tables 6 and 7 of the Environmental Report (Volume 1). They are structured using the three objectives for green belts stated in Scottish Planning Policy paragraph 49 and SDP Policy 12. They correspond to SDP policies and the content of Scottish Planning Policy as set out in Table 1, page 3 of the Environmental Report Addendum. The assessment findings set out in the appendices of the Environmental Report include the Council's overall conclusions about whether some or all of a site should be allocated in the LDP.

For ease of comparison, the assessment findings are presented in matrix form in Appendix 2 Updated of the Environmental Report Addendum. This is intended to be a similar format to that used in the Edinburgh City Local Plan Report of Inquiry. The LDP assessment uses a 'traffic light' symbology to indicate whether a site meets a criterion (green), does not meet it (red), or partly meets it / uncertainty (amber).

For sites selected and allocated in the LDP, a separate, statutory assessment of their likely environmental effects is set out in Appendix 3 of Volume 1 of the Environmental Report. In some cases this identifies likely adverse impacts. Section 4 of the Environmental Report sets these out along with proposed mitigation.

This site selection process has resulted in the Second Proposed Plan's spatial strategy, summarised on Figure 1 of the Plan. It meets the housing land requirements in full while designating a green belt which best meets the objectives of Scottish Planning Policy and SDP Policy 12.

The Second Proposed Plan's spatial strategy establishes and maintains strong, clear long-term boundaries to control the outward growth of the city.

The non-allocation of the following sites and their retention in the green belt is therefore appropriate in terms of compliance with Scottish Planning Policy and SDP Policies 1 A&B, 5, 7, 8, 9 and 12.

Further site specific responses are given as follows.

<u>Kirkliston East</u>

- The land was assessed under 'Kirkliston East' in the Environmental Report - Second Revision, Volume 2, June 2014 pages144-146 and page 65 of Volume 1. The site was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation. See page 3 of this Schedule 4 for the Council's response in terms of site selection to the non-allocation of the site.

  Current public transport accessibility was found to be poor for the site. Development of the site would also not be in keeping with the character of the settlement and local area. The scale of change would exceed that of the North Kirkliston expansion, extending the settlement eastwards away from its compact historic core and High Street. As can be experienced at north Kirkliston, it would be likely to take between 10-15 years for new boundary planting to the north of the site to filter views from the M90. Views to the edge of the settlement at North Kirkliston allow the boundary and profile of the settlement to be viewed in context, maintaining some sense of separation between Queensferry and Kirkliston.

  The existing green belt boundary is clearly formed by the railway and M90 to the north and Burnshot Rd to the south. To the southeast, it is provided by the open setting and woodland surrounding the category B Listed Almondhill steading and category C Listed Almondhill Farmhouse, whilst to the northeast, a new green belt

boundary has been established through formation of open space and tree planting. The site lacks a strong physical and visual landscape features to its east, capable of forming a robust green belt boundary. Due to the lack of an alternative green belt boundary to the east of the representation site, development would impact adversely on local views from Burnshot Road, to which the gently sloping site forms a prominent open setting when approaching the Kirkliston from the east.

The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt. No modification proposed. **(1133 Danzan 2003 Trust)**

'Factory Field', Kirkliston

- The land was assessed under 'Factory Field' in the Environmental Report - Second Revision, Volume 2, June 2014 pages147-149 and page 65 of Volume 1. The site was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation.

  Current public transport accessibility was found to be acceptable for the majority of the site. Due to the site's contained and low lying character, development of the site was found to not impact upon views from which the settlement of Kirkliston are experienced from the wider landscape.

  Main Street to the north and existing planting on the southern and eastern boundaries would provide clear green belt boundaries. The road on the eastern edge reinforces the existing planting on this boundary. The allocation of this site, however, would introduce development into a relatively discrete area of rural character on the urban fringe. There is an opportunity to create a pathlink to Main Street, but the change in level would limit opportunities to integrate new dwellings with built frontage along Main Street.

  The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt. No modification proposed. **(1155 Trustees of the Foxhall Trust)**

Craigiehall

- The land was assessed under 'Craigiehall' in the Environmental Report - Second Revision, Volume 2, June 2014 pages 128-130 and page 65 of Volume 1. It was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation. The representation received to the Second Proposed Plan includes an additional field of

farmed parkland to the west of the north avenue at Craigiehall. This additional part of the site has been assessed in the Environmental Report Addendum on pages 56-58.
Current public transport accessibility was found to be poor for the site. There is no evidence to suggest that the suggested measures for improving public transport accessibility are realistic or deliverable. The existing green belt boundary to the north west of the City is clearly formed by the strong physical and visual feature of the incised, wooded valley of the River Almond. The site lacks features capable of forming an alternative green belt boundary. The site also lacks opportunities for physical integration with the existing urban area, and would, therefore, form a new settlement within the green belt. This would require significant new infrastructure to be established. The site's potential for new residential use is constrained by the noise impact of existing flight paths which will expand northwards with the safeguarded second runway at Edinburgh Airport.

The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt. No modification proposed. **(2277 Hallam Land Management)**

- The land was assessed under 'Craigiehall' in the Environmental Report - Second Revision, Volume 2, June 2014 pages 128-130. The site was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation. See page 3 of this Schedule 4 for the Council's response in terms of site selection to the non-allocation of the site.

  Current public transport accessibility was found to be poor for the site. The existing green belt boundary to the north west of the City is clearly formed by the strong physical and visual feature of the incised, wooded valley of the River Almond. The site lacks features capable of forming an alternative green belt boundary. The site also lacks opportunities for physical integration with the existing urban area, and would, therefore, form a new settlement within the green belt.

  The site's potential for new residential use is also constrained by the noise impact of existing flight paths which will expand northwards with the safeguarded second runway at Edinburgh Airport.
  The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt and Historic Garden / Designed Landscape. No modification proposed. **(2291 Defence Infrastructure Organisation)**

Reporter's conclusions:

Context

1. Paragraph 119 of Scottish Planning Policy states that local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic

development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. Allocated housing sites should be effective in meeting the housing supply target. Policy 5 of SESplan sets out the housing land requirement for the SESplan area, and Supplementary Guidance provides the required share of this housing within the City of Edinburgh. I refer to the findings in Issue 5 where there is an identified shortfall in the programmed housing land supply. It is therefore necessary for this examination to take a positive approach to potential additional sites which are effective and may contribute to the programmed housing land supply, whilst at the same time assessing the extent of the environmental constraints.

2. The spatial strategy of both SESplan and the local development plan prioritises the development of housing within 4 strategic development areas, which do not include the sites subject to these representations. Where there is a shortfall in the programmed housing land supply, however, Policy 7 of SESplan allows consideration to be given to additional greenfield housing sites whether or not they are located within the strategic development areas. I note that the local development plan has sought to minimise the loss of green belt land by the development of brownfield sites before greenfield sites, although it has not been possible to avoid the release of land from the green belt for housing. In addition the council has assessed all the sites proposed through these representations against green belt objectives within Volume 2 of the environmental report (and in respect of the agricultural land north east of Craigiehall in the environmental report addendum), and in this context the balance to be drawn between the need for additional housing sites and the environmental effects is a key part of my examination.

Kirkliston East

Settlement context and key issues

3. Following concerns expressed on behalf of Kirkliston Community Council with respect to additional housing development within or adjacent to Kirkliston, I sought further information from the council and other parties relating to this proposed housing site. I have taken the responses into account in my examination below. This proposed housing site lies adjacent to the eastern boundary of the built up area of the village of Kirkliston, which (beyond the traditional housing of Almondhill Steadings along the boundary) comprises significant recent housing development. It is a large site of 46 hectares of prime agricultural land which appears to be in productive agricultural use. Paragraph 80 of Scottish Planning Policy seeks to protect such land but recognises that loss of this land may be justified as a component of the settlement strategy. Most of the agricultural land surrounding Edinburgh is classified as prime agricultural land, and since greenfield land requires to be allocated in order to meet the housing land requirement, I find that there is no presumption against allocating the site simply because it is prime agricultural land.

4. The site is stated to have a capacity for 500 houses, which works out at about 11 houses per hectare. This is significantly below the average density which the council uses for this local development plan to identify indicative capacity, but owing to the rural location of the site adjacent to the existing village, I find that it is likely that a much lower density of development would be appropriate in order to maintain the character of the village and its landscape setting. I note that the modern housing to the west also appears to be of a lower than average density, although higher than what is proposed. I accept the site's stated effectiveness and that it would be likely to deliver some housing within the first five year period of the local development plan.

5. The key issues to assess (from the environmental report and in the context of Policy 7 (referred to above) and Policy 12 (green belt) of SESplan) are the extent to which development would be in keeping with the settlement of Kirkliston, the effect on green belt objectives (particularly in relation to landscape impact) and infrastructure requirements (in particular transport and education). I now go on to examine these matters in more detail.

Effect on the settlement of Kirkliston

6. There is already a significant extension of the village on its north eastern side through Proposal HSG 3, although the existing eastern boundary is comprised of small group of traditional houses. With respect to the effect on the residential amenity of this housing, I find from my site inspection that this could be sufficiently protected by an open space buffer and landscaping along the western boundary of the site. The wider character of the settlement would however be significantly affected given the recent modern housing that has already taken place in this area. I note that the capacity of HSG 3 is stated in the local development plan to be 680 houses, and so together with this, the proposed housing allocation would add over 1,000 houses cumulatively to the east of Kirkliston. For a village of the size of Kirkliston this would be significant.

7. I accept the statement in the representation that the extension of the village to the east would be logical, but it would nevertheless represent a large increase in the population of the village, and further change its overall character by including a more extensive modern housing environment, thus having some adverse effect on its traditional core. However, this is not necessarily an overriding consideration, because it is a matter of degree over the change in the built environment that has already occurred. When looking at the character of the settlement and local area, the representation in fact refers to the landscape in which the settlement is located, and this is probably more significant in the circumstances.

8. A preliminary design concept has also been submitted, which builds on the existing modern residential development to the west. The development framework and design analysis appears to have been well prepared, and I accept that the approach taken would allow the proposed new housing to integrate into the settlement as well as it could be expected to do so for such a large extension of the built up area. Density, design and landscape appear to have been thoroughly considered.

9. However, whilst significant measures have been taken to allow development to integrate as far as possible into the existing settlement, I agree with the conclusion in Volume 2 of the environmental report to the extent that the allocation of the site for housing would result in a major extension of the existing settlement easterly into open countryside and away from its compact historic core. This would indeed make the integration of development into the settlement difficult without causing a significant adverse effect on its character.

Green belt and landscape impact

10. The representation refers to the green belt review undertaken to inform the preparation of the strategic development plan, where it is assessed that the landscape's influence on the setting of the settlement is low. However, from my site inspection I find that the countryside that exists between the western edge of the built up area of Edinburgh, the southern edge of Queensferry and the eastern edge of Kirkliston contributes significantly to the landscape setting of the eastern edge of Kirkliston. A further significant erosion of this countryside close to Kirkliston would have an adverse effect on this landscape setting.

11. I recognise the strategic transport networks in the area, and particularly the A90/M90 and the M9 spur extending from the M8 and the M9 to the west. This has a significant effect particularly to the west of the settlement. The effect is however less to the east and the site is very prominent from the M9 spur, where development on the site would be seen as a significant extension of the settlement into the open countryside. I acknowledge that the topography, and the generally low lying nature of the site, would mitigate this to some extent, but the traffic on the M9 spur is clearly visible from the B9080 and so it follows that housing on the site would be quite prominent. I find that there would be a significant adverse impact on the landscape setting of the eastern edge of Kirkliston.

12. The preliminary design concept shows how a strong eastern boundary could be created through extensive woodland planting, including community woodland, and therefore the development of the site would not necessarily set a precedent for further development along the north side of the B9080. The railway line and M9 spur to the north would be defining features along that boundary, and a new woodland edge could be provided. However, development would extend the existing built up area significantly into the countryside, with few landscape features which provide a good landscape framework for development on the site.

13. The extension into the countryside would also reduce the countryside gap between the western edge of Edinburgh and Kirkliston. This would be further exacerbated by any significant housing development at Craigiehall, for which there are representations which are considered below. However, whilst there would be a slight perception of a reduction in the extent of countryside between Edinburgh and Kirkliston, there would still be sufficient distance that coalescence between the settlements would not be perceived.

14. Since the site is in productive agricultural use, I accept that it is not formal open space which can be used as such by the public in general terms. However, rights of access to the countryside apply, and there may be informal use of the existing fields for walking and for access to the wider countryside along field boundaries. Housing development would change the character of the site substantially, but nevertheless access could be maintained through the site and into the wider countryside, and the provision of community woodland would be of benefit to the whole of the population of Kirkliston.

15. In overall terms, I find that green belt objectives would not be significantly undermined with respect to access into the countryside or coalescence, but they would be with respect to the landscape setting of Kirkliston, which I find would be significantly and adversely affected by housing development on this site. This could be mitigated through careful layout design, landscaping and planting of woodland, but not to an extent which would substantially reduce the overall adverse impact. In addition, the difficulty of integrating the new housing development within the village may also undermine green belt objectives by failing to maintain the character of the village.

Transport

16. I accept that housing development on the site could extend the existing network of permeable footpaths and cycle paths, that appropriate links could be provided to the core path running to the south of the site, and that this could be done without adversely affecting the site of importance for nature conservation. Active travel could in my view be sufficiently provided for.

17. However, I note that in the assessment in Volume 2 of the environmental report, the

site is not considered to have good accessibility to existing public transport. I accept that this is the case at present. However, I understand that the existing housing development to the west is already provided with a bus gate to enable public transport to operate through the site. The representation indicates that a similar arrangement could be provided for the subject site, through the creation of a wider public transport loop. I am not aware of any discussions that have been held with transport operators in this respect, but if it already applies to the existing development, I see no reason why it could not be extended to housing development on the subject site. I find that the environmental report may therefore be overly negative in stating that that there are no measures available to increase the accessibility of the site to public transport.

18. It is suggested within the representation that a new roundabout access to the site could be formed from the B9080, and secondary access could also be provided from the existing housing development access roads to the north of Almondhill Steadings. However, I am not aware of any transport assessment that has been undertaken for the site. I have noted that one of the main concerns expressed on behalf of the community council is the effect of further housing development on the roads infrastructure in the village, and I accept that the scale of housing proposed would be likely to generate a significant amount of additional traffic through the village.

19. The effect of development on the road network is a particular matter that is examined within Issue 19, and drawing on the conclusions there, recommendations are made to the council within all relevant issues to ensure that further transport assessments are undertaken, taking into account the cumulative effect of all known development and cross boundary impacts, so that the full extent of any necessary road improvements can be addressed. This would also apply to any proposed new housing sites in addition to maintaining sites already included in the plan.

20. In this context, I note that the response to the further information request on behalf of the Danzan Trust maintains that new housing development at Kirkliston East could make an important contribution as required to address identified road transport deficiencies, through the requirement for a transport assessment to be submitted through the development management process in due course. However this would be an addition to the scale of development assessed through the council's transport appraisal, and I have no evidence at this stage on the scale of any works that might be required to address the individual or cumulative impacts of the proposal. These matters would fall to be addressed through the proposed new policy recommended through Issue 19, and in the context of Policy Del 1, with a lesser degree certainty than applies to sites which have already been included in the council's transport appraisal process.

Other infrastructure

21. The effect on the Kirkliston Primary School, which is considered to be already overcrowded, is a further concern expressed on behalf of the community council. I have noted in the revised education appraisal that an extension to the school is proposed. However, I recognise that a significant new development of 500 houses adjacent to Kirkliston would require further assessment of the impact on local primary and secondary education provision. I note that provision is made within the design analysis for a potential primary school and community campus; recognising that there may be a need for additional education and community facilities. This is also referred to in the response to the further information request on behalf of the Danzan Trust. However, as the potential housing site has not been assessed within the council's education appraisal, I have less

certainty about the scale and nature of any required interventions in this respect, and these would fall to be addressed within the revised policy context of the plan.

22. I have no evidence that there are any other significant infrastructure constraints to development, apart from the safeguarding of gas mains and power lines crossing the site. Flood risk and drainage would however require further investigation. These matters would require coverage in development principles for this site, in the event that it is allocated for housing in the plan. Otherwise, the requirements for any other infrastructure would have to be assessed through the development management process in the context of Policy Hou 10 of the local development plan, where any developer contributions would be considered in the context of Circular 3/2012.

Overall conclusion

23. I conclude that there would be a significant adverse impact on the landscape setting of Kirkliston from the allocation of this site for housing, and that therefore green belt objectives would not be maintained. To this has to be added the difficulty of integrating such a large eastwards extension of the built up area into the settlement of Kirkliston, without adversely affecting its character, which may further undermine green belt objectives.

24. There appear to be no overriding infrastructure constraints, although in the absence of transport and education appraisals relating to the development of housing on the site, there is significant uncertainty about the individual and cumulative impacts of the proposal. It has not been subject to strategic environmental assessment and I have no evidence of public consultation other than the response I have received from the community council.

25. However, even if these matters were sufficiently addressed, I conclude in overall terms that the environmental consequences referred to above in the context of Policies 7 and 12 of SESplan would outweigh the contribution that the site could make to the housing land supply and the shortfall as identified in Issue 5. I therefore conclude that this site should not be allocated for housing in the local development plan.

Kirkliston Factory Field

Settlement context and key issues

26. The concerns expressed on behalf of Kirkliston Community Council with respect to additional housing development within or adjacent to Kirkliston also apply to this proposed housing site, and again I have taken the responses to my further information request into account in my examination below. This proposed housing lies to the north of the River Almond and east of the historic core of the village. There is traditional housing to the south west on Wellflats Road, and a small new housing estate at Auldgate to the west of the site. This is separated from the site by a former railway line which is now part of the core path network, and which is in a cutting below the level of the site, with a tree planted embankment forming the western boundary of the site.

27. There is also a footpath along the southern boundary of the site. The eastern boundary is formed by the access to the Foxhall Estate and Foxhall North Lodge, which is a category B listed building, to the south east of the site. This access has mature trees planted along the site boundary. The northern boundary is formed by an unclassified public road and also has mature trees planted along the site boundary, the road being

slightly above the level of the site, but not to an extent which would make access to the site particularly difficult.

28. The site is identified as prime agricultural land in Volume 1 of the environmental report, but appears to be in use as pastureland. The site also includes what appears to be a small paddock in the south west corner. Whilst the reference to the loss of prime agricultural land in the context of Scottish Planning Policy also applies here, this is not a significant factor given the relatively small size of the site (about 5 hectares) and in the context of the shortfall in the programmed housing land supply. I accept the effectiveness of the site as referred to in the representation and that it would be likely to deliver housing within the first five year period of the local development plan. It is however a relatively small site, and in my view the density would need to be fairly low in order to complement the layout, architecture and design of the traditional core of the village to the west. Possibly in the order of 10 to 15 houses per hectare would be appropriate, which would give an indicative capacity of some 50 to 75 houses.

29. The key issues to assess (from the environmental report and in the context of Policies 7 and 12 of SESplan) are the extent to which development would be in keeping with the settlement of Kirkliston, the effect on green belt objectives (particularly in relation to landscape impact) and infrastructure requirements (in particular transport and education). I now go on to examine these matters in more detail.

Effect on the character of the village

30. The site is fairly close to the historic core of the village, which is a designated conservation area, and so the effect of new development on the character of the village is a significant matter for consideration, both in the context of Policy 7 of SESplan and the objectives of the green belt in Policy 12 of SESplan. In the assessment in Volume 2 of the environmental report, it is stated that development on the site could not be integrated into and in keeping with the character of the settlement and local area. There are also relevant matters with respect to the impact on the landscape setting of the settlement which are considered further below.

31. The council's main concern, both as expressed in Volume 2 of the environmental report and in its response to the representations above, is the effect of the topography (change in levels) and mature tree planting in preventing the integration of development on the site with the built form in the core of the village. I accept that the embankment and tree planting along the western boundary would cause some visual separation, but this would to some extent make it easier for modern housing development to preserve the character and appearance of the conservation area.

32. At the same time, there are views to the village centre from the southern part of the site. In addition, the assessment in Volume 2 of the environmental report accepts that there is the opportunity to create path links to Main Street, Auldgate and Wellflats. From my site inspection, I find that this is clearly the case from the south west corner of the site. There would probably be no opportunity to create links directly to Auldgate from the western boundary where new housing has been built to the west of the site. However, and notwithstanding the change in levels, there would be no difficulty in creating attractive links through the woodland to the core path directly to the north of this housing, which in turn would lead to Auldgate and then on to Station Terrace and Main Street.

33. The development strategy submitted with the representation actually provides a

comprehensive assessment of the relationship between the site and the existing built form of Kirkliston. The concept map shows a development area largely benefitting from the existing screening provided by the mature tree planting along the boundaries of the site, and of particular importance is the mature tree planting along the embankment on the western boundary of the site. It also shows a public park in the southern part of the site, which would benefit from the intervisibility with the village centre, whilst limiting the visual effect of the housing on the character of the conservation area. The development strategy would provide appropriate development principles in this context, in the event that the site is allocated for housing in the local development plan.

34. It therefore appears to me that the physical relationship of the site to the historic core of the village allows the possibility of multiple links between the two areas to ensure appropriate integration and the retention of some intervisibility between development on the site and the village centre, whilst at the same time keeping some visual separation which would make it easier for modern housing to preserve the character of the conservation area. I therefore find that the conclusion in Volume 2 of the environmental report is unnecessarily negative on this matter.

Green belt and landscape impact

35. I do not agree with the statement in the representation that the site does not contribute to the purpose and function of the green belt. The site constitutes agricultural pastureland with substantial mature trees along its boundary, and in my view it enhances the setting of Kirkliston on approaching the village along the unclassified road to the north of the site.

36. Furthermore, there is always likely to be some landscape impact from any housing development which is located on the fringe of the built up area, and particularly with respect to a relatively small settlement such as Kirkliston. The key issue to be examined is the extent of that landscape impact (whether it is a significant adverse impact) and whether or not as a result it undermines the objectives of the green belt in the context of Policy 12 of SESplan. I do not consider that there is any issue of coalescence between settlements with respect to this site, nor do I consider that it would adversely affect access to the wider countryside from the village.

37. From my site inspection, I find that the site has a particularly good landscape framework, mainly through the mature trees along the boundaries of the site. The western boundary is however essentially the existing settlement, and the trees along the private access to the Foxhall North Lodge would form a defensible boundary; perhaps not quite as strong as the existing eastern settlement boundary, but certainly a sufficiently defensible boundary. In particular, and although earlier representations had sought land to the east for housing as well, I am satisfied that no precedent would be set for this by the development of the subject site for housing. Housing extending further east would clearly constitute a much more significant linear extension of the built form to the east of the traditional core of the village.

38. Paragraph 51 of Scottish Planning Policy recognises the need for development in smaller settlements within the green belt, where appropriate leaving room for expansion. In this context, I consider that this relatively small and contained site, with a good landscape framework, presents an opportunity to redefine a defensible green belt boundary, whilst at the same time recognising the opportunity for development on the site which would not undermine green belt objectives.

39. In overall terms, I find that green belt objectives would not be significantly undermined by housing development on this site. I agree with the conclusion in the assessment in Volume 2 of the environmental report that the development of the site would not affect the wider landscape setting of the city. I also find that it would be possible to integrate development within the village, at the same time preserving the character and appearance of the conservation area, in terms of the submitted development strategy, which would assist in maintaining green belt objectives.

Other environmental impacts and constraints

40. An environmental risk assessment has been submitted which examines all of the potential environmental constraints to development. Of particular note, there is a preliminary ecological appraisal, which refers to the site of importance for nature conservation to the north west of the site, and the possible interest in the site as a habitat for European and other protected species. There is information which would provide appropriate development principles in the event that the site is allocated for housing.

41. In addition, the risk of fluvial and surface water flooding has been assessed, and although there is an area to the south with a high risk of flooding, the site itself is not considered to be significantly at risk. Nevertheless, in the event that the site is allocated, it would be appropriate to require a flood risk assessment through the development principles. In general terms, I find that the environmental risk assessment has been thoroughly undertaken, and provides confidence that there are no significant environmental risks arising from the development of the site for housing. The setting of the category B listed Foxhall North Lodge would be preserved.

42. Notwithstanding the above, whilst the site has been included in the overall assessment of sites in Volume 2 (and listed in Appendix 2 of Volume 1) of the environmental report, it has not, unlike the proposals included in the plan, been subject to formal strategic environmental assessment. I note that the site is not included in Appendix 3 of Volume 1 of the environmental report, which constitutes the assessment of sites against strategic environmental assessment objectives.

Transport

43. The assessment in Volume 2 of the environmental report states that the site has good access to public transport. Given the potential links to the village centre from the south east corner of the site, which is in fairly close proximity to existing bus routes, I find that this is an appropriate assessment. As referred to above, there is substantial opportunity to provide footpath and cycle links, including to the core path, which in turn provides a reasonable access (for cycles) to Dalmeny Station, some 3 kilometres away.

44. The main vehicular access would be taken from the unclassified public road to the north of the site, with a possible secondary access from the private access to the Foxhall Estate and North Lodge. This means of access appears from my site inspection to be feasible. Appropriate pedestrian and cycle links to the existing network would need to be provided. However, I have also noted that one of the main concerns expressed on behalf of the community council is the effect of further housing development on the roads infrastructure in the village.

45. The proposed housing would be likely to generate additional traffic, although this is limited by the relatively small size of the site. This traffic would however be additional to

the traffic flows assessed through the council's transport appraisal, and I have no evidence at this stage on the scale of any works that might be required to address the individual and more specifically any cumulative impacts arising. These matters would fall to be addressed through the proposed new policy recommended through Issue 19, and in the context of Policy Del 1, but with a lesser degree of certainty at this stage than applies to sites which have already been assessed through the council's transport appraisal process. Nevertheless, I find that there is no evidence to suggest that the traffic from new housing development on the local road network could not be appropriately addressed.

Other infrastructure

46. The effect on the Kirkliston Primary School, which is considered to be already overcrowded, is a further concern expressed on behalf of the community council. I have noted in the revised education appraisal that an extension to the school is proposed in the context of HSG 3. This proposed housing site would be a further addition to that assessed in the council's education appraisal. I recognise that additional housing may require further school capacity improvements, and that developer contributions may be required as appropriate, but I have no details of this. I also refer to the findings in Issue 21, relating to the requirement for Supplementary Guidance to provide greater clarity about the delivery of education infrastructure. However, given the relatively small scale of the site, I have no reason at this stage to consider that these matters could not be sufficiently addressed within the framework set out in the plan.

47. I have no evidence that there are any other significant infrastructure constraints to development, apart from flood risk and drainage which would require further investigation, and would require coverage in development principles for the site in the event that it is allocated for housing in the plan. Otherwise, the requirements for any other infrastructure would have to be assessed through the development management process in the context of Policy Hou 10 of the local development plan, where any developer contributions would be considered in the context of Circular 3/2012.

Consultation with the community

48. One of the major concerns expressed by Kirkliston Community Council is that the views of the community have not been sufficiently taken into account with respect to the housing sites allocated in the proposed plan. I note that the only housing site currently proposed in the plan in relation to Kirkliston is HSG 3. This would have been subject to due consultation through the local development plan process. Additional sites as proposed in the representations were assessed by the council and the consequent report was published alongside the second proposed plan. However, I accept that the degree of consultation on these sites, including the Factory Field, does not compare with that applied to sites carried forward from the main issues report consultation or subject to the requirements for notification which apply to all sites in the proposed plan.

49. In the context of Circular 6/2013, it is open to me to include additional sites if the proposed plan is found to be deficient and for this plan Issue 5 concludes that there is a shortfall in the supply of housing land to meet the SESplan target. Accordingly, given the merits of this site, I have carefully considered its inclusion. However, the circular also advises that other sites should only be included where there is sufficient environmental information and evidence of consultation. I have sought the views of the community council and consider the matters it raises could be addressed. However, I have no evidence of wider community consultation or on matters which may have been raised by

others in the community including those living in close proximity to the site. I also have no evidence from any formal assessment against environmental objectives. These matters are drawn together with my findings above in my overall conclusion below.

Overall conclusion

50. I conclude that housing development on the site would integrate sufficiently with, and be in keeping with the character of the village of Kirkliston. In addition, there would be no significant adverse impact on the landscape setting of Kirkliston from the allocation of this site for housing, and therefore green belt objectives would be maintained. I also conclude that the available evidence provides confidence that there are no other significant environmental risks that would arise from the development of the site for housing.

51. However, despite my recognition of the potential of this site for development, it has not been subject to the level of assessment (including the transport appraisal and strategic environmental assessment) which has been given to other sites already allocated in the proposed plan, and there has been limited consultation with the community. I therefore conclude that there is insufficient justification for the allocation of the site for housing development in the local development plan at this time.

52. Nevertheless, I conclude that the site presents an opportunity for housing development which should be recognised by the exclusion of this site from the green belt and its inclusion within the settlement boundary. This is reflected in my recommendation below. Any future development on the site would then be subject to further detailed assessment within the policy framework set out in the plan, and the consultation process which would take place through the development management process. In the event that housing on the site is not implemented through the development management process, the matter would fall to be further considered at the next review of the local development plan.

Craigiehall

Background

53. Representations from both the Ministry of Defence and Hallam Land Management Limited seek the designation of land at Craigiehall for housing development. The Army currently uses the buildings within Craigiehall Estate (and adjacent housing which is understood to be used by army personnel) which it has occupied since 1939. The housing would be likely to continue to be so occupied, but otherwise the use of the buildings is now surplus to the requirements of the Ministry of Defence, and is expected to cease during 2016. The Defence Infrastructure Organisation has identified the site for future disposal.

54. It is however submitted within the representations that there is potential for a more comprehensive housing development than just the site used by the Army, and the representations from the Ministry of Defence and Hallam Land Management Limited (the latter also relating to the inclusion of surrounding agricultural land as well as the site used by the Army), whilst being separately lodged and being considered on their own merits, are mutually compatible and should therefore also be considered together.

Strategic context

55. The land at Craigiehall directly adjoins the West Edinburgh Strategic Development Area, although it is separated from the existing urban area by the River Almond. This is

nevertheless a material consideration when assessing the suitability of the wider site for housing, particularly given the shortfall in the programmed housing land supply, and adds to the arguments in favour of allocating the site for housing, in the event of acceptable environmental consequences being determined. Housing development in this area is likely to support the policies for economic development in West Edinburgh to some extent, although not to the extent of the strategic housing sites at Maybury and Cammo, given that the land at Craigiehall is relatively less accessible.

56. I also note that removing the Ministry of Defence site from the green belt was a preferred option in section 7.8 of the main issues report, on the basis that it was a major existing use within the green belt occupying a site of more than 20 hectares. However, in the event it was decided not to exclude the site from the green belt in the proposed local development plan. It is clearly a matter of degree in determining which sites occupied by major uses should be excluded from the green belt in the context of Scottish Planning Policy. On balance, I find that the scale of the existing use, coupled with the fact that the use is imminently due to be discontinued, is not such that it should be excluded from the green belt as a matter of course.

57. Nevertheless, the development of the Ministry of Defence site would constitute brownfield development, and so its development for housing would minimise the loss of green belt land. The difficulty however is that this site is separated by countryside from the existing built up area of Edinburgh, and therefore development on the site would be isolated from existing services, community facilities and public transport within the Edinburgh built up area, and would not integrate into any existing settlement.

58. I understand that this is why the wider site is now being promoted for housing development under the proposed new village concept. Not only may the wider site conform to such a concept, but the development would then extend almost to the existing built up area, being separated from it only by the River Almond Valley at the south east corner of the site. However, the wider site as a whole would not constitute a logical extension to the built up area, and would still largely rely on the new village concept being deemed to be acceptable. I therefore firstly examine the merits of allocating the Ministry of Defence site for housing, as a brownfield development site in the countryside, and then the wider village concept being promoted for more extensive housing development. This would make a significant contribution in the longer term to the housing land supply, although the prospective developer states within the representation that only some 250 houses would be expected to be provided in the plan period, thus limiting its contribution to the programmed housing land supply, particularly in the first 5 years of the plan period.

<u>The Ministry of Defence site</u>

59. A masterplan has been prepared to indicate how the site could be developed for housing. The primary constraints on the site are the category A listed Craigiehall House and Walled Garden, and the associated designed landscape. Being a site in the green belt, landscape impact is an important consideration, although there is generally a good landscape framework for development on the site, and particularly the woodland planting along the River Almond Valley. There is also evidence of potential interest in the site as a habitat for European and other protected species, and further investigation would be required on this matter. Areas of the site adjacent to the River Almond are at risk of flooding, and the site is also affected by the airport safeguarding zone and noise contours.

60. However, none of these constraints would rule out development on the site, although

they may affect its overall capacity for development. Development would not only secure a viable use for an otherwise potentially redundant brownfield site, but it would ensure the preservation of the important heritage assets on the site, which might otherwise fall into disrepair. New development would have to respect the fabric and siting of the existing listed buildings, walled garden and designed landscape, but I see no reason why it should not be possible to do this, including a possible hotel use for the nationally important Craigiehall House. However, substantial detailed investigation of the above constraints would be required in order to progress housing development on the site.

61. The site is isolated from the existing built up area, and there is limited access to sustainable forms of transport. There are 3 bus stops along the A90 with frequent services, but nothing to the west of that, and no detailed evidence showing how access could be improved. Access to Dalmeny Station would appear to rely on existing bus service access or cycling to the station. However, I note that National Cycle Route 1 runs to the east of the A90. There is also no detail relating to transport impact including cumulative impact or on the provision of education or other community facilities. The site did not form part of the council's transport and education appraisals, or the strategic environmental assessment. I find that there is insufficient evidence at the present time to suggest that the site could be developed as a sustainable location for housing, and I have some doubt given the identified constraints that it would provide completions within the plan period to an extent which would contribute significantly to the housing land requirement, even with associated commercial use. There are existing policies within the local development plan which would allow favourable consideration to be given to a proposal for brownfield (or windfall) housing development if constraints have been appropriately resolved.

The village concept

62. However, I also need to examine the development prospects for housing on the larger site, including surrounding agricultural land. The representation on behalf of Hallam Land Management Limited requests the allocation of a larger site for housing development, comprising 1,000+ houses. In addition to the Ministry of Defence site, the larger site includes surrounding agricultural land extending to the north as far as the unclassified road described as Burnshot Road, to the east as far as the A90, and to the south as far as the Almond River Valley.

63. I note that in Volume 2 of the environmental report the Ministry of Defence site and the larger site are assessed in separate sections. In addition, and following a representation to the second proposed plan, another field was added to the larger site, and a further assessment is made in the environmental report addendum. Whilst I accept that in order to enable brownfield development it may be acceptable to allow a limited amount of greenfield development, I do not consider that the whole site can be described as a brownfield site, because there are significant areas of arable farmland included, and the loss of such land needs to be taken into account. I also accept that both sites are being promoted for housing development, and may be considered available for development, but I have already noted the limited expected delivery of housing within the plan period.

64. Whilst there is good accessibility to public transport along the A90, the site extends significantly to the west, to the south of Burnshot Road, and so I find that in overall terms the site actually has limited access to public transport along the A90, and I am not aware that any commitment has been made on the part of public transport providers to extend bus services into the site. It is accepted in the representation that infrastructure capacity

has yet to be fully assessed.

65. I find that the wider site has quite a good landscape framework, particularly to the south along the River Almond Valley, and that there would generally only be local views of development on the site. However, local views of development from the east along the A90 (particularly from the north east boundary of the site where the slip road exits onto Burnshot Road), from the west along Burnshot Road, and from the entrance into the site from the A90 would be substantial, and would change the current rural character of the area significantly. Whilst the impact could be mitigated through further landscaping and tree planting to some extent, I find that housing development on the site would be likely to have an adverse impact on the landscape setting of the city. This is not necessarily an overriding consideration, given the need for some green belt land release, but it is a factor which weighs against allocating the site for housing development, because it would potentially undermine green belt objectives in the context of Policy 12 of SESplan.

66. I have already referred above to the fact that development would extend almost to the existing built up area of Edinburgh at the southeast corner of the site, but it would not constitute a logical extension of the built up area, even accepting that pedestrian links could be created. I also note that the core paths to the south and east provide connectivity with the existing built up area and the countryside generally. However, I find that the justification for allocating the site relies significantly on the village concept being promoted.

67. The masterplan approach refers to the inherent qualities of the site in terms of the designed landscape, and the important heritage assets in the form of Craigiehall House and Walled Garden. There is already significant use of the buildings in the Craigiehall Estate, and there are already houses within the wider site used for Army personnel which would be retained.

68. The concept for development appears to revolve around the development of the Ministry of Defence site for some 200 houses, a hotel and commercial facilities, and a possible transport hub for the wider development. In the wider site, it is suggested that medium density surrounding the Ministry of Defence site would be appropriate, with low density housing towards the edges of the site. This would appear to constitute a more radical approach intended to allow development to be planned as a new village, and which is seen as a single entity rather than urban sprawl. This is a concept which deserves further consideration, but I find that it has not yet been developed to an extent which justifies the allocation of the whole site as a housing site in the local development plan.

Infrastructure

69. This is a significant proposed release from the green belt for housing which, given its location and being detached from the urban area, would require careful consideration of transport and other infrastructure impacts. Whilst the findings above relating to transport and education for the two Kirkliston sites would generally also apply here, I find that transport and education appraisals would in this case be necessary in order to assist in determining whether or not the principle of such housing development would be acceptable. However, in view of my findings above, I do not consider that it is necessary to further examine infrastructure provision in relation to this.

Overall Conclusion

70. In overall terms, I conclude that there is insufficient justification for the allocation of

either the Ministry of Defence site on its own, or the whole site as identified in the representation on behalf of Hallam Land Management Ltd, for housing development. The development of the Ministry of Defence site on its own would constitute isolated brownfield development in the countryside, with many constraints yet to be resolved, and I consider that this would be more appropriately pursued through the development management process as brownfield (or windfall) development in the context of the existing policies in the local development plan.

71. I also conclude that although the wider village concept may have some potential, this requires further detailed assessment. The concept has not been developed to an extent which justifies the allocation of the site for housing development, given the extensive loss of agricultural land and adverse landscape impact undermining green belt objectives. I also conclude that it is likely to make only a limited contribution to the programmed housing land supply. Given the scale of the proposal and its potential implications for the spatial strategy of the plan, I conclude that the proposal should be considered further (if appropriate and justified in the context of any new housing target) through the next review of the local development plan.

Reporter's recommendations:

Kirkliston Factory Field

Modify the proposed plan by:

1. Amending the proposals map to redefine the green belt boundary to run eastwards along the south side of the unclassified road to the north of the site, southwards along the west side of the access road to the Foxhall Estate and North Lodge, and then westwards along the path defining the southern boundary of the site as far as the edge of the existing built up area. The resulting area between the green belt and the urban edge would then be included in the settlement boundary but not allocated for development at this stage.

Issue 16	**Suggested Housing Sites Outwith the Urban Area – South West**	
Development plan reference:	**Table 4 pages 25 – 27** **Proposals Map**	**Reporter:** Richard Bowden

Body or person(s) submitting a representation raising the issue (including reference number):

0204 Gordon Laing	2275 Murray Estates
0685 Cala Management Ltd	2276 Gladman Developments Ltd
0698 David Wilson Homes and J & J Muir	2278 Stewart Milne Homes
1252 Michael Crowe	2280 Mr and Mrs Philip and Barratt David Wilson Homes
2085 A & D Brewster	2281 Wallace Land Investment and Management
2131 Lafarge Tarmac	2333 Goldsmith Brothers Ltd
2251 Taylor Wimpey	2583 Colin Paton
2272 Lord Dalmeny	

Provision of the development plan to which the issue relates:	This issue covers suggested releases from the green belt and countryside for housing allocations submitted by developers and individuals to sites within the South West area of Edinburgh.

Planning authority's summary of the representation(s):

CONTEXT

All of these proposed housing sites were the subject of representations to the first Proposed Plan. Question 4 of the of Main Issues Report sought opinion on new housing on Greenfield sites in areas other than West and South East Edinburgh.

RATHO

<u>South of Freelands Road</u>

- The first phase of land suggested to be released from the green belt at east Ratho is for approximately 180 units. It is contiguous to existing residential development and physically close to the tram hub at Gogar. Development at east of Ratho would make a significant contribution to local infrastructure and community facilities and is wholly deliverable. The site does not make any significant contributions to green belt objectives. **(0698 David Wilson Homes and J & J Muir)**

- The first phase of a wider strategic area of development at east Ratho extending to approximately 50ha, suggested to be released from the green belt, for approximately 180 units. It is contiguous to existing residential development and physically close to the tram hub at Gogar. Development at east Ratho would make a significant contribution to local infrastructure and community facilities and is wholly deliverable. The site does not make any significant contributions to green belt objectives. **(0698 David Wilson Homes and J & J Muir)**

East of Ratho (land at Ashley House)

- The loss of Green Belt resulting from residential development at Ashley House, Ratho would not affect the overall strategic role of the green belt at this location as set out in Scottish Planning Policy or adversely affect the historic character and importance of the original House and is considered deliverable in the short term. **(2583 Colin Paton)**

West of Baird Road

- Considers the brownfield site north of Ratho with an indicative capacity for 60-80 units can be delivered as an effective site that meets the housing shortfall and meets the criteria in SDP Policy 7. The site is in designated Countryside but there are no environmental constraints to development. The site is accessible, with established and proposed public transport provision and ready access to local services/facilities. A Proposal of Application Notice (Ref: 11/03540/PAN) was submitted and public consultation undertaken for a care home and care cottages in 2011. **(2085 A & D Brewster)**
- Allocate land to the West of Baird Road, Ratho for residential development to assist in achieving the required additional housing land required to ensure accordance with SDP and Scottish Planning Policy. This is an effective housing site in line with Planning Advice Notice 2/2010. It is located within walking distance of a range of essential services, in close proximity to bus stops and connected to cycle routes. **(2131 Lafarge Tarmac)**

South of Ratho Park Road

- Considers the site at South of Ratho Park Road is an effective housing site which has a strong relationship with the existing village and can afford Ratho an improved, robust and defensible green belt boundary and will not undermine SDP Policy 7 and accords with SDP Policy 12 with regards to green belt objectives. Development of the site would be accommodated below the existing skyline and through the creation of new landscape belts would only be visible from the local road network. Development of the site will improve the edge of the village and will be in keeping with the character of the settlement. The site is accessible by public transport, walking and cycling. Additional land can be provided for a bridge link to the canal towpath. The site is effective, as set out in PAN 2/2010. **(2278 Stewart Milne Homes)**

Ratho Park Road

- Considers that the site characteristics at Ratho Park Road for 85 houses can create a contained well defined development with connections to the existing settlement. Development of the site will improve the edge of the village and will be in keeping with the character of the settlement. The development will not undermine Green Belt objectives and can fund any additional infrastructure requirements. Development of the field would not disrupt the landscape pattern or setting of Ratho. The site offers the opportunity to create a strong positive relationship to the canal, building upon the development on the north side of the canal. Development of the site would not undermine SDP Policy 7 (b) and accords with SDP Policy 12. The site is accessible by public transport, walking and cycling. Additional land can be provided for a bridge link to the canal towpath. The site is

effective, as set out in PAN 2/2010. **(2278 Stewart Milne Homes)**

NEWBRIDGE/RATHO STATION

Ratho Station North

- Allocate land to the south of Harvest Road (A), Newbridge, for residential development to assist in achieving the required additional housing land required to ensure accordance with SDP and SPP. It is well served by bus and anticipated public transport improvements. Considers the land should be excluded from the Countryside and included in the urban area boundary for Ratho Station. The existing boundary follows Harvest Road but is inconsistent around existing dwellings. It would be logical to alter the boundary to the east of the existing dwellings to move south to the railway line to include the site within the urban area. To the west of the existing dwellings it would be logical to keep the proposed boundary as existing to protect the existing trees. In this regard the built up area of Ratho Station does extend to meet the railway line to the south at other locations within the village and therefore this requested change would not cause encroachment of the village further into the Countryside. The railway line also forms a defensible boundary ensuring further piecemeal encroachment is not encouraged. Considers that the development of the site would not detract from either the landscape quality or rural character of the area and therefore protection of the site from development by Policy Env 10 is unnecessary. **(2131 Lafarge Tarmac)**

Ratho Station South

- Allocate land to the south of Harvest Road (B), Newbridge, for residential development to assist in achieving the required additional housing land required to ensure accordance with SDP and Scottish Planning Policy. It is well served by bus and anticipated public transport improvements. **(2131 Lafarge Tarmac)**

BALERNO/CURRIE/JUNIPER GREEN

- States concern about the promotion of in-fill sites in Currie for housing on the grounds of impact on traffic and road safety, pollution, impact on local community facilities and schools, loss of open space, farmland and impact on the habitat and natural environment. States concerns about the impact on the railway bridge from increased traffic. Alternative brownfield sites are available at Binkbonny and Lanark Road. **(1252 Michael Crowe)**

Currievale (Riccarton Garden Centre)

- The land at Riccarton Garden Centre, Currie is a strip of land between the eastern boundary of Housing Proposal HSG 36 and Riccarton Mains Road to the east. The land is necessary to complete the proposed Curie link road that will provide the road linkage to Riccarton Mains Road and beyond. This land is surrounded by wholly defensible boundaries, is within walking distance of Curriehill Rail Station and represents a logical extension to Housing Proposal HSG 35. The site benefits from mature landscape. **(0685 Cala Management Ltd)**

Currievale

- The land at Currievale comprises a strip of land between the western edge of HSG 36 and the northern boundary of HSG 37 to the north. Approximately 30 hectares in size it could accommodate approximately 420 houses. It is a wholly defensible location with excellent links to the local road network and in close proximity to a bus corridor. It will deliver housing product in the short, medium and long term including the construction of a link road for the A70 corridor. The site is well contained by established landscape features and other man made features, such as the rail line to the north and as a result will not significantly impact on the setting or overall character of the village. **(0685 Cala Management Ltd)**

Ravelrig Road

- Considers the site at Ravelrig Road, Balerno is deliverable within the plan period and would help meet an effective five year housing land supply. It will provide a range of good quality housing and is well served by infrastructure and local facilities. It would not undermine green belt objectives. The northern boundary of the site would provide a more logical settlement edge. The development would provide improvements to existing infrastructure and enhance the economic efficiency and sustainability of the area. **(2276 Gladman Developments Ltd)**

Cockburn Crescent

- Considers the site at Cockburn Crescent, Balerno is an effective site able to deliver units within the Plan period. It meets the criteria in SDP Policy 7 as it offers the scope to complete the village at its southern end through reinforcement of the existing tree belt, not undermine the green belt objectives by providing a clear settlement boundary and new greenspace and woodland public access and can fund local infrastructure upgrades. Its development would not impact on the landscape setting and identity of the city. In the Appeal Decision letter ref: PPA-230-2112, the Reporter noted that extension of housing into the proposed site would extend the pattern of development that has already occurred at Balerno. However, no definitive stance was taken on impact upon character as it was considered not the forum to do so. The Council's LDP Environmental Report – Second Revision, also considered that the site has potential for physical integration with the townscape to the north, by virtue of the pattern of built form, streets and open spaces. Considers it appropriate to include a Site Brief for the site to set out the key development principles. **(2280 Mr and Mrs Philip and Barratt David Wilson Homes)**

Harlaw Gait

- The site at Harlaw Gait, Balerno has been assessed to demonstrate its effectiveness and deliverability. Land for housing outwith the Strategic Development Areas will be required to meet the housing shortfall. Considers that the site contributes little in terms of recreational amenity and if the mitigation is implemented there should be no adverse impact from its removal from the green belt. A clear, defensible and long-term green belt boundary is capable of being formed around Bog and Sawpit Woods beyond is the Pentlands. Services for the site area available from the Harlaw Gait carriageway. Surface runoff from the site could be suitably attenuated on site, or if needed additional attenuation and

measure used. The proposed development is well located in relation to the existing transport network and enhancement to the site's connectivity are being considered. Tree loss will be kept to a minimum and any loss will be offset with replacement planting. Archaeology and ecology surveys have been undertaken and further studies may be required. Whilst the land is identified as Grade 3.1 quality agricultural land, it is a small isolated parcel of land which is not in active agricultural use. Considers the site accords with the SDP, in particular SDP Policy 7 requirements for development of greenfield housing, and meets the tests for an effective and deliverable site as set out in Planning Advice Note 2/2010 within the Plan period. **(2272 Lord Dalmeny)**

Muir Wood Road

- Land at Muir Wood Road is agricultural land situated to the east of Muir Wood Road, Currie. The site is well contained on the urban fringe, close to frequent public transport, community facilities and the strategic road network. Development will be screened from wider view by the woodland of Baberton Golf Course, the undulating landform of the site and the continuous built frontage along the length of the A70. The allocation of the site accords with SDP Policy 7 in terms of impact on landscape setting and its development will not undermine green belt objectives. The site meets the tests for an effective and deliverable site within the Plan period, as set out in PAN 2/2010. If development at Newmills Road can be successfully integrated with the character of the settlement and local area, an identical conclusion should be reached in the case of Muir Wood Road due to the obvious similarities between the sites. Both sites would impact on local landscape character and visual amenity but neither would impact substantially on views from Lanark Road West. The site's recreational value will be enhanced through upgrading the informal footpath to Broomielaw Park. **(2251 Taylor Wimpey)**
- Development of the land at Muir Wood Road would not meet the provisions of the green belt. This was the subject of a reporter's report (DPEA PPA 230 – 2091). The field is in agricultural use and meets green belt objectives of preventing coalescence between Currie and Juniper Green. It contributes to the green network and community discussions are on-going about possible community uses for the field. Supports the Council in not allocating this site for housing. **(0204 Gordon Laing)**

EDINBURGH GARDEN DISTRICT

General

- Considers the Edinburgh Garden District appropriate for a mixed use development for the following reasons: will make a substantial contribution to maintaining a five year housing supply; complies with SDP Policy 7; includes a mix of uses including a visitor attraction, possible new stadium, schools, community facilities, enhanced public transport; job creation; the site can be well served by infrastructure, including drainage and water capacity and is immediately deliverable in respect of power supply.
  Considers the sites have good accessibility including tram stops within walking distance of the northern part of the site. Has concerns over the LDP's Environmental Report accessibility methodology, which does not take into account planned improvements to public transport. **(2275 Murray Estates)**

Edinburgh Garden District – South

- The South site is visible from the A71 and A720 and the urban edge of Edinburgh is prominent in the views to the east. To the south there are open foreground views of the Pentlands, whilst to the east, Corstorphine Hill is prominent and from the higher areas of the site, there are views across the Firth of Forth to the Lomond Hills. Development on both sides of the A720 would occur, which would be consistent with the existing settlement pattern to the south, where Baberton has also been developed to the west of the Bypass. Defensible boundaries are already formed by the road and rail network as are the wooded boundaries to Riccarton Campus. Additional tree planting could be included to Gogar Station Road to further enhance the boundaries to the north and northwest. **(2275 Murray Estates)**
- The site at Calder Road is suitable for inclusion as part of the surrounding land currently being promoted by Murray Estates for development as Edinburgh's Garden District. **(2333 Goldsmith Brothers Ltd)**

Edinburgh Garden District – West

- The site would bring built form into an area which has rural characteristics, particularly within the western part of the site. However, views of the city from within the site are constrained as are views into the site from the M8 as it is aligned within a cutting and views out from the site are contained, particularly within the western part of the site, due to tree groups and the relatively low lying nature of the area. There are limited views of the outskirts of Edinburgh, but prominent features such as Corstorphine Hill and the Pentland Hills are afforded views from the western part of the site. The A71 and associated planting around Riccarton Campus provides a strong boundary to the south as does Gogarburn with its woodlands to the north. Substantial new planting would be required to the east and west boundaries (particularly the latter) to define a clear green belt boundary. New planting could visually and physically connect with woodland around Gogar Golf Course and along Addiston Farm Road. **(2275 Murray Estates)**

RICCARTON VILLAGE

- Concerns about the to the promotion of land for housing development at Riccarton Village, Currie on the grounds of impact on traffic and road safety, pollution, impact on local community facilities and schools, loss of open space, farmland and impact on the habitat and natural environment. Concern about impact on railway bridge from increased traffic. Alternative brownfield sites are available at Binkbonny and Lanark Roads. **(1252 Michael Crowe)**

Riccarton South and West

- The Plan fails to maintain an effective 5 year land supply. Riccarton Village would add a further 400 completions to 2019 and help meet the housing shortfall over this Plan period. Considers it an appropriate to allocate this new village for the following reasons: well connected to Curriehill Rail Station and the Hermiston Park & Ride; new distributor road improving road safety; has the landscape capacity to accommodate this scale of development; no adverse impact on local character or undermine the green belt objectives and additional infrastructure capacity will be provided without detriment to existing communities. **(2281 Wallace Land Investment and Management)**

Modifications sought by those submitting representations:

RATHO

South of Freelands Road

- Suggests the land at east Ratho is allocated as the first phase of a residential development, for approximately 180 units. Remove from the green belt and include in Table 4 of the Plan as a new housing proposal. **(0698 David Wilson Homes and J & J Muir)**
- Suggests the land at east Ratho is allocated for residential development of approximately 180 units, as part of a wider strategic area of development east of Ratho. Remove the site from the green belt and include in Table 4 of the Plan as a new housing proposal. **(0698 David Wilson Homes and J & J Muir)**

East of Ratho (land at Ashley House)

- Allocate land at Ashley House, Ratho for residential development and associated uses. **(2583 Colin Paton)**

West of Baird Road

- Recommends that the brownfield site, north of Ratho, is removed from the countryside and allocated for residential/care development in the Plan. **(2085 A & D Brewster)**
- Allocate land to the West of Baird Road, Ratho for residential development. **(2131 Lafarge Tarmac)**

South of Ratho Park Road

- Amend the Plan to include land at South of Ratho Park Road for residential development with an indicative capacity of 350 units and remove the site from the green belt. **(2278 Stewart Milne Homes)**

Ratho Park Road

- Suggests the allocation of land at Ratho Park Road for 85 houses and inclusion within Table 4 New Housing Proposals. **(2278 Stewart Milne Homes)**

NEWBRIDGE/RATHO STATION

Ratho Station North and South

- Allocate two sites (A and B) to the South of Harvest Road, at Ratho Station, for residential development. **(2131 Lafarge Tarmac)**

BALERNO/CURRIE/JUNIPER GREEN

- Widen or straighten Curriehill Road at railway bridge to cope with increased traffic. **(1252 Michael Crowe)**

Currievale (Riccarton Garden Centre)

- Suggests the land at Currievale (Riccarton Garden Centre), Currie be allocated for residential development and associated uses for 110 houses, to meet wider housing land requirements. **(0685 Cala Management Ltd)**

Currievale

- Suggests the land at Currievale be allocated for residential and associated uses for approximately 420 houses, to meet wider housing land requirements. **(0685 Cala Management Ltd)**

Ravelrig Road

- Site west of Ravelrig Road, Balerno should be allocated for 120 dwellings in Table 4-New Housing Proposals p27 in the Plan. The site should be removed from the green belt. **(2276 Gladman Developments Ltd)**

Cockburn Crescent

- Amend the Plan to include land at Cockburn Crescent, Balerno for residential development in Table 4-New Housing Proposals p27 with an estimated capacity of 280 units. **(2280 Mr and Mrs Philip and Barratt David Wilson Homes)**

Harlow Gait

- Amend the Plan to add Harlow Gait, Balerno for 40-45 houses in Table 4-New Housing Proposals p27. **(2272 Lord Dalmeny)**

Muir Wood Road

- Allocate land at Muir Wood Road for residential development in Table 4 of the Plan with an indicative capacity of 250 units, and remove from the green belt. **(2251 Taylor Wimpey)**

EDINBURGH GARDEN DISTRICT

Edinburgh Garden District – South and West

- Amend the Plan to allocate the entire Edinburgh Garden District site for mixed use development or, failing that, allocate the East of Milburn Tower portion (see Issue 14). **(2275 Murray Estates)**

Edinburgh Garden District – West

- Suggests the site at Calder Road be included within the Edinburgh Garden District Masterplan area for housing. **(2333 Goldsmith Brothers Ltd)**

RICCARTON VILLAGE

- Widen or straighten Curriehill Road at the railway bridge to cope with increased

traffic. **(1252 Michael Crowe)**

Riccarton South and West

- Amend the Plan to include Riccarton Village for residential development in Table 4 with an estimated total capacity of 1,500 units. **(2281 Wallace Land Investment and Management)**

Summary of responses (including reasons) by planning authority:

Site Selection – General

- The Plan must conform to the relevant provisions of the approved SDP and its Supplementary Guidance. These include a requirement for a generous allocation of housing land in the Council's area and the designation of a green belt around Edinburgh (SDP Policies 5, 7 and 12).

  In preparing the plan, the Council has sought to meet the overall housing land requirement in ways which prioritise use of brownfield sites in existing urban areas and which minimise the loss of land from the Green Belt, in accordance with SDP paragraphs 113 and 130. The Council's response to the representations in Issue 5 explains why it is nevertheless necessary for this LDP to make significant new releases of greenfield land from the green belt at this time, and of the scale set out in the Second Proposed Plan.

  In selecting greenfield housing sites for release, the Council has sought to minimise the impact on greenbelt objectives and to secure long-term boundaries, in accordance with SDP Policy 12 and paragraph 130. To do so, the Council has assessed relevant greenfield land for its suitability in these terms. The site assessment process has gathered evidence on the relevant land on a systematic and consistent basis and presented its findings in a way which enables comparison and hence selection of those sites which are most appropriate. This approach has been informed by consideration of the findings and recommendations of the Report of Inquiry for the Edinburgh City Local Plan (pages 1-21 to 1-26).

  For the Plan the Council has set out the evidence of its housing site assessment in the project's Environmental Report, which also presents the statutory Strategic Environmental Assessment of the Plan. The method and criteria used in the site selection process are described in Volume 1 of the Environmental Report – Second Revision, pages 26-33. The site assessments are set out in Appendices 5-9 (Volume 2) and, for some sites, the Environmental Report Addendum.

  At each stage of the Plan project the Environmental Report has been revised and updated as appropriate to:
  - show what regard has been had to statutory representations received at the previous stage;
  - respond to changes in the SDP context to the LDP, which have required additional housing land to be found.

  The criteria used for the housing site assessment are set out in Tables 6 and 7 of the Environmental Report (Volume 1). They are structured using the three

objectives for green belts stated in Scottish Planning Policy paragraph 49 and SDP Policy 12. They correspond to SDP policies and the content of Scottish Planning Policy as set out in Table 1 in the Environmental Report Addendum (page 3). The assessment findings set out in the appendices of the Environmental Report include the Council's overall conclusions about whether some or all of a site should be allocated in the Plan.

For ease of comparison, the assessment findings are presented in matrix form in Appendix 2 Updated of the Environmental Report Addendum (an updated version of Appendix 2 of the Environmental Report – Second Revision (Volume 1)). This is intended to be a similar format to that used in the Edinburgh City Local Plan Report of Inquiry. The LDP assessment uses a 'traffic light' symbology to indicate whether a site meets a criterion (green), does not meet it (red), or partly meets it / uncertainty (amber).

For sites selected and allocated in the Plan, a separate, statutory assessment of their likely environmental effects is set out in Appendix 3 of Volume 1 of the Environmental Report. In some cases this identifies likely adverse impacts. Section 4 of the Environmental Report sets these out along with proposed mitigation.

This site selection process has resulted in the Second Proposed Plan's spatial strategy, summarised on Figure 1 of the Plan. It meets the housing land requirements in full while designating a green belt which best meets the objectives of Scottish Planning Policy and SDP Policy 12

The Second Proposed Plan's spatial strategy establishes and maintains strong, clear long-term boundaries to control the outward growth of the city.

The non-allocation of the following sites and their retention in the green belt is therefore appropriate in terms of compliance with Scottish Planning Policy and SDP Policies 1 A & B, 5, 7, 8, 9 and 12. Further, site specific responses are given as follows.

RATHO

<u>South of Freelands Road</u>

- The land at east Ratho was assessed under 'South of Freelands Road' in the Environmental Report – Second Revision, Volume 2, June 2014 p221- 223. The site was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation.

  The representation to the Second Proposed LDP includes an extension of the site to the east (the second representation is for a larger area), the assessment of which is included within the Environmental Report Addendum pages 69-72. The entire site scores poorly for accessibility and the additional land offers no potential to improve accessibility. The additional land would further impact on the setting of

the Union Canal and the City's landscape setting between Ratho and Gogar. The additional land does not offer a robust boundary to the north east or south and is remote from the existing settlement and the Union Canal and Ratho Golf Club create significant barriers to integration. The representation has not fully considered the objective of the green belt to protect and enhance the character, landscape setting and identity of settlements, or the criteria of SDP Policy 7. Conclusions of 'South of Freelands Road' in LDP Environmental Report – Second Revision, pages 221-223 remain valid.

The allocation of either the first phase or the wider strategic area would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt. No modifications proposed. **(0698 David Wilson Homes and J & J Muir)**

East of Ratho (land at Ashley House)

- The land at Ashley House, Ratho was assessed under 'East of Ratho' in the Environmental Report Addendum pages 73-75. The site was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation.

  The site scored poorly for accessibility. The existing green belt boundary is clear. The development of the site would form an uncharacteristic isolated parcel of rural housing that would not integrate into the settlement of Ratho and would adversely impact on the rural landscape to the west of the City, including views from the Union Canal towpath. The site and adjoining listed buildings is fairly prominent in views from the M8 and has some scenic value.

  The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt. No modifications proposed. **(2583 Colin Paton)**

West of Baird Road

- A separate representation for residential development/care home, a smaller site within the larger site promoted by Lafarge Tarmac, was assessed under 'West of Baird Road' in the Environmental Report – Second Revision, Volume 2, June 2014 pages 227- 230. The Environmental Report Addendum pages 64-68 considers this site within the same assessment as the wider West of Baird Road site. Whilst development of this land could assist in the remediation of its derelict condition, the introduction of housing in this location would impact adversely in views from the northern approach to the settlement on Baird Road, where open fields which contribute to Ratho's rural setting would be replaced in views by housing set below the wooded ridgeline to the north. Housing would also alter open views experienced upon exiting the village, beyond the threshold of the ridgeline. Dwellings would be set apart from the existing settlement by open agricultural land

and dispersed nature of historic buildings within the Conservation Area. The site has poor accessibility and impact on local settlement character and lack of integration cannot be overcome.

The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the countryside. No modifications proposed. **(2085 A & D Brewster)**

- The land at west of Baird Road, north of Ratho, was assessed under 'West of Baird Road' in the Environmental Report – Second Revision, Volume 2, June 2014 pages 227-230. The site was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation.

  The representation to the Second Proposed Plan shows a change to the site boundary to exclude land within the Conservation Area around Ratho Hall. This has been assessed in the Environmental Report Addendum pages 64-68. The reduced site area is likely to reduce impacts on views to the site from the Union Canal, though housing may still be visible in places through woodland on the ridgeline. Whilst development is omitted from the Conservation Area, it is still likely to impact on its character and visual appearance, due to the site's position adjacent to the Conservation Area boundary. Development would also continue to impact on the wooded character of the Ratho Hills, which are proposed as a Special Landscape Area and contribute to the wider landscape setting of the city, forming a backdrop to the Conservation Area in northward views from Ratho to the south. Development would feature prominently upon this ridgeline, particularly in winter months in absence of foliage cover.

  The majority of the site scores poorly for accessibility and comments on integration with existing settlement remain valid, and the revised site area will further isolate any development from the main settlement.

  The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the countryside and Special Landscape Area. No modifications proposed. **(2131 Lafarge Tarmac)**

<u>South of Ratho Park Road</u>

- The site south of Ratho Park Road has been assessed under 'South of Ratho Park Road' in the Environmental Report – Second Revision, Volume 2, June 2014 pages 214-217. The site was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on

countryside recreation.

As stated in the Environmental Report, 'development of the site would require to establish a new planted boundary along the fenced field boundary to the south over the short to medium term, with a lack of features on the ground to distinguish this position from the surrounding arable land.' Scottish Planning Policy states that 'hedges and field enclosures will rarely provide a sufficiently robust boundary.' Whilst Ratho Park was served by a driveway to the west, review of historic maps does not reveal any clear evidence of preceding agricultural shelterbelts of note in this location.

The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt. No modifications proposed. **(2278 Stewart Milne Homes)**

Ratho Park Road

- The site at Ratho Park Road has been assessed under 'Ratho Park Road' in the Environmental Report – Second Revision, Volume 2, June 2014 pages 218-220. Public transport accessibility was found to be poor in the majority of the site, apart from a small strip on the western boundary where accessibility was acceptable, with no scope for enhancements.

  Development would impact on the landscape setting of the city and would not be in keeping with the character of the settlement and local area, adding an urban residential development into the rural landscape.

  Since publication of the Second Proposed Plan in June 2014, Planning Appeal ref: PPA-230-2124 (relating to detailed planning application 13/05165/FUL Land adjacent to Ratho Park Road, Ratho for residential development of 85 units) was dismissed by the Reporter, in light of the change to SDP Policy 7. Paragraphs 36-39 set out the Reporter's reasoning with regard to the conclusion that development of the land at Ratho Park Road would not satisfy two of the SDP Policy 7 criteria i.e. development would not be in keeping with the character of the settlement and local area and would be likely to undermine green belt objectives.

  The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt. No modifications proposed. **(2278 Stewart Milne Homes).**

NEWBRIDGE/RATHO STATION

Ratho Station North

- The land to the south of Harvest Road, Ratho Station (A) (which is in fact within the West Strategic Development Area area, the boundary being the railway line) was assessed under 'Ratho Station North' in the Environmental Report Addendum pages 15-17. The site was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of

infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation.

Current public transport accessibility was found to be acceptable for the majority of the site, although the physical separation from the settlement cannot be overcome. The site is visually contained from the wider landscape and development of the site would form a natural continuation of the built form within Ratho Station and would not be out of keeping with the existing fragmented settlement. However, despite the railway line providing a strong physical feature it lies within a cutting and would not provide a visual boundary to new development. Supplementary tree planting would be necessary leaving the developable site area to a cluster of rural dwellings rather than a well planned settlement extension.
The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the countryside. No modifications proposed. **(2131 Lafarge Tarmac)**

Ratho Station South

- The land to the south of Harvest Road, Ratho Station (B) was assessed under 'Ratho Station South' in the Environmental Report Addendum pages 18-20. The site was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation.

  The site adjoins an operation quarry that the Plan safeguards for mineral extraction. Current public transport accessibility was found to be acceptable for the majority of the site. Physical separation from the settlement cannot be overcome and the site is divided by the railway to the north which limits any opportunity for physical integration. This large-scale extension of Ratho Station would be out of keeping with, and remote from, the existing settlement. The site is visually contained by planting, the wooded hillside to the south could form a good boundary but the west would be less clearly defined by the operational quarry. The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the countryside. No modifications proposed. **(2131 Lafarge Tarmac)**

BALERNO/CURRIE/JUNIPER GREEN

- Any realignment of the road network at Currie would only be necessary if considered an appropriate measure to help mitigate the impacts to the road network associated with new development. The details of which would be informed by appropriate future transport assessments associated with detailed planning applications for the sites. No modifications proposed. **(1252 Michael Crowe)**

Currievale (Riccartion Garden Centre)

- Riccarton Garden Centre and land at Currievale, Currie were assessed under 'Currievale' in the Environmental Report – Second Revision, Volume 2, June 2014 pages 180-186. Land was assessed against criteria including: whether land was brownfield or greenfield and availability of the site for development; accessibility to existing public transport, opportunities for enhancing public transport; level of infrastructure capacity and opportunities for enhancing infrastructure; the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation.

  The Environmental Report acknowledged that the eastern parcel of the Currievale representation site (now submitted as Riccarton Garden Centre) benefitted from existing containment in views from the wider landscape. However, the site was found to have several constraints likely to produce a fragmented urban layout, lacking continuity of built form and strong relationship to existing residential areas to the south. The constraints include: high voltage overhead powerlines and pylon towers, storm water storage and changes in level across the land. The retention of existing perimeter woodland and delivery of the proposed 'link road' would further sub-divide any layout and reduce potential capacity for development. This is borne out by Figure 17, the Illustrative Plan on page 28 of the Currievale Site Submission, which shows the site split by the overhead powerline wayleave and proposed 'link road'. This would not minimise the impact on the green belt. These substantial constraints mean that a sizeable green belt release of 9 ha would yield only 110 units.

  The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt. No modifications proposed. **(0685 Cala Management Ltd)**

Currievale

The western part of the land at Currievale, outwith the proposed allocations at Curriehill Road (HSG 36) and Newmills Road (HSG 37) was assessed under 'Currievale' in the Environmental Report – Second Revision, Volume 2, June 2014 pages 180-186. It was considered to be constrained in terms of its steeply sloping terrain, the stand off required to high voltage overhead power lines and pylon towers and its proportions in terms of providing vehicular access and a coherent housing layout at its narrower eastern end. Whilst potential may exist to connect to paths at Currievale and Curriehill Strip, development would form a linear outer parcel of housing, lacking close and frequent integration with the pattern of existing streets. The railway line to the north has a particularly open boundary to the site and adjacent countryside. The bulk of housing is proposed to the north and west of Currie, which was not part of the Green Belt Study recommendations. Such marginal development on the edge of a modest sized settlement would do much harm to its overall character and identity.

The 2008 Green Belt Study reported capacity for development to the north -east of Currie but not to its north-west. This was due to the land's association with the existing settlement and containment within the landscape. The study did not

specify an alternative green belt boundary and recommended woodland planting beyond the representation site. The suggestion to underground overhead powerlines would only carried out in exceptional circumstances and such network assets are typically retained in situ.

The existing green belt boundary at Currie is defensible. It comprises established garden boundary plantings and field hedgerow planting. These are aligned with the prominent break in slope between the ridge top plateau and rolling farmland to the north. This combination of landform and planting provides a clear visual boundary marker in the context of a rural settlement. The maintenance and appearance of planting is a matter for private landowners.

Detailed design cannot overcome the combined effect of a series of existing site constraints, which will have an important bearing on the shape, layout and form of any development.

The Illustrative Plan, Figure 17, page 28 of the Currievale Site Submission, shows the land split into two triangular parcels by the proposed 'link road' and powerlines. Much of the land to the north of Currievale Drive is shown to accommodate little more than a single line of dwellings with the road and open space alignment reinforcing the linearity of the overhead lines.

Applying a 30 m stand off to tree planting to the overhead pylon towers, which have a parallel arrangement to the railway line, limited ground remains to establish the strong pattern of hedgerows, trees and woodland to integrate the development with its landscape setting and provide an alternative green belt boundary.

The landform is considered unsuitable for development as it is north-facing and sits at a gradient of between 10-15%. Whilst this does not exceed a 20% incline, it will present challenges with regard to orientation of dwellings, garden ground and fitting of a new roads across the slope by means of cut and fill operations.

The Council considers a more appropriate and sufficient solution to meeting development needs would be to provide a modest extension to Balerno across the ridge top plateau to the west of Newmills Road (HSG 37) (see Issue 12). This landscape provides a structural wedge within Balerno and this role would be continued by the proposed large greenspace (GS 11), providing for integration between development and the existing townscape and addressing an existing deficiency in terms of the Council's Open Space Strategy large greenspace standard. Development of the site would not impact on the wider landscape setting of the city and enable clear and defensible green belt boundaries to be formed. Development would also provide for part of an off-road alternative to National Cycle Network 75 to be formed between Kirknewton and the Water of Leith. These principles would be undermined by a 'link road' as per the representation, separating the Green Space Proposal GS 11 - Newmills Park from the proposed housing.

The allocation of further land at Currievale would therefore not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt. No modifications proposed. **(0685 Cala Management Ltd)**

Ravelrig Road

- The land at Ravelrig Road, Balerno was assessed under 'Ravelrig Road' in the Environmental Report – Second Revision, Volume 2, June 2014 pages 168-170. The site was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation.

  The housing site assessment in the LDP Environmental Report – Second Revision concluded that the site would not impact on green belt objectives and that an alternative green belt boundary could be formed. When considered against SDP Policy 7 criterion a) as part of the Council's housing site assessment, its physical relationship and potential integration with the existing settlement of Balerno was found to be curtailed by the existing line of development along Lanark Road West. The majority of the site scores poorly for accessibility, and there are no measures to increase accessibility. The site was discounted primarily due to its poor public transport accessibility and lack of scope for enhancements.

  The representation included a submission of a Design & Access Statement / Vision Document which concluded that development would not have an adverse visual impact on the setting of Balerno and would repair the distorted pattern of growth in the settlement. The indicative masterplan is based on a low density model of 13 units /ha. Density calculations do not reflect the gross site area. A number of the indicative set-backs proposed could be developed and the site capacity could therefore be higher. There is no requirement to buffer each site/field boundary. Given the City's strategic housing requirements, it is not efficient use of land to develop the site at 13 units/ha. As per Policy Hou 2, a mix of house types could assist in providing a higher density development without impacts on character or amenity. Options 2 and 3 in the Design and Access Statement demonstrate that this would be possible.

  The Edinburgh Green Belt Study 2008 is referenced, which suggested some capacity for a small scale extension to Balerno on the representation site. The Edinburgh Green Belt Study did indeed consider that the slacker slopes and strong framework of hedgerows and woodlands on the northern edge of Balerno could provide a degree of containment for limited new development. Supplementary woodland planting and management of existing trees was advised. The Edinburgh Green Belt Study did not take into account other housing site assessment criteria such as transport.

  A Landscape and Visual Impact Assessment (LVIA) was submitted concluding that development would have a minor adverse impact on landscape character, negligible impact on the Northfield Gardens and Designed Landscape and limited visual impact on its surroundings, generally consistent with the site assessment carried out within the Plan Environmental Report. The Landscape and Visual Impact Assessment comments that options 2 and 3, which are based upon densities of 20.5 and 25 units per ha, would provide less of an urban to rural transition and contrast with the development patterns which typify the northern

edge of Balerno. Higher densities would result in more tightly grouped dwellings with more limited garden plantings to integrate the proposed development with its setting.

The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt. No modifications proposed. **(2276 Gladman Developments Ltd)**

Cockburn Crescent

- The land at Cockburn Crescent, Balerno was assessed under 'Cockburn Crescent' in the Environmental Report – Second Revision, Volume 2, June 2014 pages 164-167. The site was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation.

  Current public transport accessibility was found to be acceptable for the majority of the site.

  Development of the site would continue the pattern of Balerno's 20th century development, however, it would extend development further into the upland fringe of the Pentland Hills, away from Balerno's historic core. Development would impact adversely on existing open views to the skyline of the Pentland Hills, as experienced from the southern edge of the settlement and a principal road and Core Path route leading out to the Pentland Hills Regional Park. The hills are an important landscape feature from which the city and its surrounding settlements can be understood and experienced.

  The Appeal Decision letter ref: PPA-230-2112 noted that landscape constraints apply particularly strongly to Balerno. Whilst acknowledging that the settlement pattern could be extended to the south, the Reporter also stated that the proposal 'could also be seen as a further erosion of village character, where the original settlement becomes increasingly isolated from its rural hinterland and marginalised within a large modern housing estate.' The Reporter did not find that the proposal would be in keeping with the character of the local area, which includes the countryside to the south of Balerno. The Reporter noted the appellant's argument that the proposal would soften the appearance of the settlement boundary, considered to be an 'inappropriately hard edge', when viewed from the south. However, the Reporter also stated 'that the proposed development would significantly change the rural setting of Balerno by moving the boundary closer to the hills and reducing the agricultural buffer between the built-up area and wild character of the hills themselves.' It was noted by the Reporter that the site forms part of a candidate Special Landscape Area, providing an open foreground setting to the Pentland Hills. The Reporter stated that 'the hills are an important recreational asset and the core path along Mansfield Road is one of the main access routes for pedestrians and cyclists. The view south from this path would be significantly affected by substituting houses, however well landscaped, in place of

open fields.'

It is possible that any proposal, as part of site design and layout, could extend access to open space within and beyond the site. As existing development to the south of Balerno is already well provided for in terms the broad central greenspace of Marchbank Community Park, 6 ha in extent and of 'good' quality grade, the proposal to create further greenspace is considered to be a neutral effect. This was noted by the Reporter in Appeal Decision letter ref: PPA-230-2112. It is acknowledged that an additional path connection could be made along the southern boundary of the site, which would formalise access taken between the existing path to the west of the site and Mansfield Road. However, in absence of development, the network of informal paths around the site would remain.

Taking into account issues including accessibility and landscape, the Council has identified a site at Newmills Road as its preferred option for meeting strategic housing needs in South West Edinburgh in an appropriate and sufficient manner. Development of the site would not affect the landscape setting of the city and enable clear and defensible green belt boundaries to be formed. Additionally development of the site would provide for part of an off-road alternative to National Cycle Network 75 to be formed between Kirknewton and the Water of Leith. The proposed large greenspace would also assist integration between development and existing townscape, whilst addressing existing deficiencies in open space provision to the northeast of Balerno, in terms of the Council's Open Space Strategy standards. This requires dwellings to be within 800 m walking distance of a significant accessible greenspace of at least 2 ha of 'good' quality.

The proposed tree protection plan has adequately specified the necessary set-back to development. Despite the site's edge of settlement location and distance from the City, any greenfield release should make efficient use of land, supporting a mix of housing types to achieve higher densities without impacting on amenity or character of the local area.

Subject to reinstatement, the remnant tree belt to the south of the site could form the basis of an alternative green belt boundary. However, the Council considers that this benefit to any development would be outweighed by the loss of an open foreground to views of the Pentland Hills, which can be experienced both from within the existing settlement and along Mansfield Road, a core path route out to Threipmuir and a gateway to the Pentland Hills. The retention of such views through the site would not be compatible with delivery of 280 dwellings and a strongly wooded green belt boundary to the south.

Whilst the existing green belt boundary does not constitute a major road, if this were fashioned as a densely planted boundary, this would obscure the open aspect to the Pentland Hills to the south, which presently contributes to the sense of place within Balerno.

Equally, whether Mansfield Rd was fronted by development or by woodland, the open aspect to the Pentland Hills from this route would become enclosed. Should the Reporter to be minded to recommend allocation of this site, it would not be desirable in urban design reasons for it to be completely screened from Mansfield Road by woodland planting as set out in the indicative development framework.

The Council has already acknowledged that the site is relatively contained in views from the wider landscape by a combination of landform and woodland cover. Enclosed by these features and supplementary planting, development would be unlikely to impact adversely upon the overall characteristics and qualities of the upland fringe of the Pentland Hills.
The existing publicly available views towards the Pentland Hills considered in the LDP Environmental Report are those experienced from private motor vehicles, by pedestrians, cyclists and bus passengers, with impacts on residential receptors also noted. Glimpsed views back to the Hills from Marchbank Park and adjacent streets area also noted. The Landscape and Visual Assessment supporting the representation also considers a range of visual receptors, therefore it is unclear why it is argued that Appeal Decision letter ref: PPA-230-2112 has been based upon considerations of private residential amenity.
The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt. No modifications proposed. **(2280 Mr and Mrs Philip and Barratt David Wilson Homes)**

Harlaw Gait

- The site at Harlaw Gait, Balerno has been assessed as 'Harlaw Gait in the Environmental Report – Second Revision, Volume 2, June 2014 pages 174-176. The site was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation.

  The landscape and visual assessment in the Environmental Report - Second Revision did not consider that development of the site would impact on the landscape setting of the City, rather that development of the site would impact on Balerno's local landscape setting and Conservation Area, contrary to SDP Policy 7.

  The existing green belt boundary to the north remains clearly formed by the incised, wooded valley of the Bavelaw Burn and change in level to the south of Balerno, which also forms a natural barrier to integration of this site with the existing settlement, despite the site's proximity in terms of a straight line distance.

  It is accepted that the existing development at Harlaw Gait lies to the east of the Bavelaw Burn, orientated with the representation site to its rear. The existing dwellings are backed by the broad belt of woodland at Bog Wood, which clearly forms the green belt boundary.

  The findings of the SESplan Green Belt Study (2008) have been superseded by the Council's detailed housing site assessment. The site is located within the Currie Farmland Landscape Character Area, covering a broad extent of land from the Bavelaw Burn and urban edge of Balerno to the west, Water of Leith to the north and City Bypass to the east with the steeper flanks and upper slopes of the Pentlands to the south. This Landscape Character Appraisal was assessed in

Stage 1 of the Edinburgh Green Belt Study as meeting green belt criteria; it was therefore not taken forward to Stage 2 of the Study to explore potential capacity to accommodate built development.

The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt. No modifications proposed. **(2272 Lord Dalmeny)**

Muir Wood Road

- The site at, Muir Wood Road has been assessed as 'Muirwood Road' in the Environmental Report – Second Revision, Volume 2, June 2014 pages 193 -195. The site was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation.

  Whilst land at Newmills Road and Muir Wood Road appear broadly similar in plan as wedges of farmland within the green belt breaking up the urban corridor along Lanark Road, on case by case appraisal, there are some key differences between their contexts, constraints and opportunities in terms of integration with the character of settlement and local landscape.

  It is acknowledged that both sites are similar in scale and development would result in local impacts on landscape character and visual amenity. Development of either site would not impact on views from the wider landscape setting of the City and the prevailing characteristics of rolling farmland to the north and the Water of Leith and upland fringe of Pentland Hills to the south, would remain intact.

  It was equally recognised that development of land at Muir Wood Road would provide for the potential integration with existing streets and pedestrian routes between Muir Wood Road and Bloomiehall Park. However, part of the site is enclosed to the south and southeast. Again, a similarity with land at Newmills Road exists, where potential connections lie to the southwest, east and northwest of the site but where woodland separates the site from Willow Tree Place to the south.

  The proposed green belt boundary of both sites would align with the northern edge of Currie and Balerno, which follows the break of slope between the farmed plateau and steeper slopes to the north. Muir Wood Road already benefits from an existing wooded boundary along the southern edge of Baberton Golf Course, whereas this would require to be created at Newmills Road. However, in the recent Planning Appeal Decision PPA-230-2091, the Reporter commented that 'despite the lack of strong boundaries to the west and east, [sic] the site and the adjoining agricultural land, including Baberton Golf Course, form part of a well defined greenbelt wedge.'
  Newmills Road, HSG37, whilst commonly perceived as providing separation between Currie and Balerno, does in fact lie wholly within the boundary of Balerno

Community Council, which is defined by the north-south linear greenspace of Currievale situated just over 500 m to the east of the site. By contrast, the land at Muir Wood Road does represent the acknowledged boundary between Currie and Juniper Green, which broadly runs along the edge of the Juniper Green Conservation Area to the east of the site.
Appeal Decision PPA-230-2091 re-stated the site's role within the green belt and the sense of separation it helps establish between Currie and Juniper Green. The Reporter considered this is strengthened by the site's association with adjacent agricultural land and Baberton Golf Course, whilst the Council's Environmental Report also notes the site's visual coalescence with Bloomiehall Park.

Whilst the Edinburgh Green Belt Study identified the land at Muir Wood Road had landscape capacity for development, it noted that this would result in coalescence and that the existing transmission lines could technically constrain development.

Residents of Juniper Green already have access to open space at Bloomiehall Park, a Community Park of 2.2 ha and 'Good' quality, which meets the Council's quantitative and qualitative Open Space Strategy standards. Equally, residents of the Muir Wood estate within Currie, have access to Muir Wood Park, which at 1.8 ha in extent is just under the Council's 2 ha standard but which forms a relatively large Community Park of 'Very Good' standard. Both Community Parks include play facilities; consequently, there is no apparent shortage of open space within the immediate locale, or the requirement to provide an additional community garden (not indicated on the masterplan) or additional play space. Therefore there is no substantive evidence that development of this land would form a more sustainable settlement pattern.

Whilst the Environmental Report notes that informal path connections could be formalised and retained as part of development of the site, the Appeal Decision for PPA-230-2091 considered this to be more of a neutral impact and that in absence of development the network of informal paths around the site would remain.

Assessing the Site Location and Masterplan, it is accepted that in combination with intervening tree planting, a courtyard model of development would help to focus the eye away from the site's pylon towers. However, the masterplan layout does not fully demonstrate the good practice principles set out in the guidelines prepared by the National Grid (A Sense of Place – Design Guidelines for Development near High Voltage Overhead Lines). No functional use apart from rough grass is identified for the land within the wayleave, which forms a constant 60 m wide corridor between the two development parcels indicated, creating an ambiguous leftover space. The corridor is defined by back garden boundaries, reinforcing the linearity of this space with a lack of natural surveillance.

The Appeal Decision for PPA-230-2091 equally considered the awkward shape and form of the proposed housing development that resulted from the wayleave as part of planning application 12/01968/PPP and this has now been replicated across land to the east of the site, which the appellant previously promoted as a 'green wedge'. The representation has not demonstrated how such constraints could be successfully overcome by site planning. This would most likely necessitate a much reduced quantum of development from the 250 units proposed.

The Council considers that for a site of this relatively modest scale, the wayleave required to the existing high voltage overhead powerlines divides the site in two. This poses a substantial constraint upon development and generation of a high quality and coherent masterplan. In this respect, the Council disagrees with paragraph 17 of Appeal Decision for PPA-230-2091.
In all other instances where a proposed allocation is affected by a similar wayleave, the site is either of greater extent, which provides additional space for creative site planning to assist in absorbing the transmission lines and towers into the wider structure of open space; the constraint is marginal to the layout, or the wayleave occupies land which forms part of a strategic cross-boundary connection.

The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt. No modifications proposed. **(2251 Taylor Wimpey)**

EDINBURGH GARDEN DISTRICT

Edinburgh Garden District – South and West

- The land at Edinburgh Garden District was assessed under 'Edinburgh Garden District South' and 'Edinburgh Garden District West' in the Environmental Report – Second Revision, Volume 2, June 2014 pages 204- 209 and pages 210-213. The site was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation.

- For the Edinburgh Garden District South site, current public transport accessibility was found to be poor with accessibility improving towards the north west corner adjacent to the park and ride. There are no measures available to increase accessibility for the southern part of the South site without large scale rerouting of public transport services. For the Edinburgh Garden District West part of the site, the majority has poor public transport access with accessibility improving to the south east corner adjacent to the adjacent to the park and ride. There are no measures available to increase accessibility for the majority of this site without large scale rerouting of public transport services.

  In calculating public transport accessibility, the Public Transport Accessibility Levels methodology calculation is a function of the time to access the public transport stop and the frequency and number of services. The Public Transport Accessibility Levels by definition is only looking at existing public transport accessibility (see paper 'Measuring Accessibility' for a full explanation of Public Transport Accessibility Levels methodology). The route is a single service route and being able to access the same service at a number of stops does not influence the score, only the closest stop is considered. Natural barriers such as the city bypass or the M8 can only be crossed where there is a means to do so. Rail stations at Edinburgh Park and Wester Hailes are not considered to be within

reasonable walking distance of the majority of the proposed site.

For the Edinburgh Garden District South site, Volume 2 of the LDP Environmental Report – Second Revision, page 205 concludes that development would impact adversely on the open characteristic of the landscape and affect the landscape setting of the city. Whilst the Canal, Westburn Avenue and the level crossing provide access points to the built up area to the south and east of the site, the M8, bypass, A71 and railway line to the east and Baberton to the south restricts the close integration with the existing townscape. Baberton was developed to the north of Juniper Green in the 1970s, forming part of the urban corridor along the Lanark Road, as indicated in Figure 1 – the LDP Spatial Strategy Summary Map. The City Bypass was constructed between 1981-90, forming an effective barrier to the subsequent westward expansion of the City.

The first paragraph of Volume 2 of the LDP Environmental Report – Second Revision, page 213, acknowledges that much of the Edinburgh Garden District West site is concealed by wooded cuttings along the M8. However, it also noted that land between the A71 and M8 is visible from the M8, set against the backdrop of the Pentland Hills. The fifth paragraph on page 213 concluded that that the additional height of development would be prominent in views from the A71 (over 1.35 km distance) and sections of the M8 between its crossing of the Gogar Burn and to the west of Hermiston (approx. 750 m distance) thereby affecting views from strategic approach roads to the west of the City. It is estimated that this would apply to approx. 1.35 km of the A71 and approximately 750 m distance along the M8, which broadly corresponds with the middle-third of the site.

Whilst the site is not a conspicuous feature in views to and from the city, its physical extent and rural character contribute much to the landscape setting of the City to the west of the Bypass. This is particularly prevalent along a 2 km stretch of the Union Canal with an open outlook to features of the wider landscape and due to the prevalent pattern of numerous wooded, Inventory and non-Inventory designed landscapes. The presence of urban development would substantially alter the character of this land and detract from the enjoyment of this recreational route through the green belt, thereby undermining greenbelt objectives. It would therefore not be in accordance with criteria a) or b) of SDP Policy 7.

Approximately 1.4 km along the west edge of the land referred to by the representation would require new woodland planting to form a robust and defensible green belt boundary. This would be based upon minor roads and hedgerows within the green belt, which would not form a sufficiently robust boundary to a green belt release of this scale. With the exception of the proposed new sites at Queensferry, which are bounded by the strong physical feature of the A90 and approach to the Queensferry Crossing and where existing woodland will be supplemented by sections of new planting, the scale of boundary creation required at Garden District West is not consistent with proposed allocations in the LDP.

The development at Edinburgh Garden District cannot be closely integrated with the existing townscape within the City to the east and the LDP spatial strategy has not indicated that a new settlement is appropriate in this location. The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment.

This site should be retained in the green belt. No modifications proposed. **(2275 Murray Estates)**

Edinburgh Garden District - South

- The land at Calder Road was assessed under 'Edinburgh Garden District South' in the Environmental Report – Second Revision, Volume 2, June 2014 pages 204-209 and Environmental Report Addendum pages 76-82. The site was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation.

  For the Edinburgh Garden District South site, Volume 2 of the LDP Environmental Report – Second Revision, page 205 and the Environmental Report Addendum pages 76-82 concludes that whilst small scale rural housing development closely related to the original curtilage of East Hermiston would not impact on the wider landscape setting of the city, the wider Edinburgh Garden District South site development would impact adversely on the open characteristic of the landscape. On its own the site is isolated within the green belt and would not be large enough to logically define a green belt boundary. An intensification of development would weaken green belt boundaries and form an isolated parcel of housing within the green belt.

  The site, either located within the Edinburgh Garden District or as a stand alone site cannot be closely integrated with the existing townscape within the City to the east and the LDP spatial strategy has not indicated that a new settlement is appropriate in this location. The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt. No modifications proposed. **(2333 Goldsmith Brothers Ltd)**

RICCARTON VILLAGE

- Any realignment of the road network at this location would only be necessary if proved necessary to help mitigate the impacts to the road network associated with new development. The details of which would be informed by appropriate future transport assessments associated with detailed planning applications for the sites. No modification proposed. **(1252 Michael Crowe)**

Riccarton South and West

- The land at Riccarton Village was assessed under 'Riccarton South and West' in the Environmental Report Addendum pages 83-85. The site was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation.

Due to the configuration of the site boundary, exclusions of parcels of land, constraints such as overhead power lines and flood areas, the establishment of a logical and clearly defensible greenbelt boundary is undeliverable. Integration with the existing urban areas is limited by the railway and power lines to the south and power lines and tree belts and sports fields to the north. Current public transport accessibility was found to be poor, apart from the provision of new bus facilities at Riccarton and pedestrian links improving the east section, it is not demonstrated that there are any realistic measures available to increase accessibility for the remainder. The LDP spatial strategy has not indicated that a new settlement is appropriate in this location. The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt. No modifications proposed. **(2281 Wallace Land Investment and Management)**

Reporter's conclusions:

General

1. The housing land requirement is set out in the strategic plan for the area - SESplan. Its associated supplementary guidance- Housing Land November 2014 breaks down the requirement for each of the council areas including the City of Edinburgh. There is a statutory requirement for this local plan to demonstrate consistency with SESplan. In this context the proposed plan must identify a corresponding supply of housing land, which should be effective or capable of becoming effective over the plan period.

2. These matters are assessed in more detail in the conclusions section of Issue 5. I recognise the importance of the city's significant brownfield resource in providing future housing and enabling regeneration of the waterfront and other areas. However, I also accept that given the extent of the housing land requirement combined by the often long lead in times and high costs of delivery associated with brownfield sites these would not alone achieve consistency with the strategic plan. The assessment undertaken through Issue 5 demonstrates the requirement for green field sites to contribute to the housing land supply particularly in the first five year period if the SESplan target is to be met.

3. The Strategic Development Plan for Edinburgh and South East Scotland (SESplan) identifies 4 Strategic Development Areas (SDAs) in Edinburgh – to be the biggest areas of change over the 10 year plan period. As such these SDAs are intended to provide the focus for new housing development, investment opportunities and job creation in locations that can demonstrate good accessibility to existing or planned public transport services. In line with the overall strategy, in addition to identifying significant development proposals in the SDAs the new plan also seeks to support change in appropriate locations elsewhere - including through regeneration opportunities, redevelopment of vacant sites and use of empty commercial units, as well as through increasing densities of development.

4. SESplan Policy 9 requires local development plans to provide policy guidance that will require sufficient infrastructure to be available, or its provision to be committed, before development can proceed. The council's site assessment and the action plan, which has been prepared to accompany the proposed plan, seek to address these matters. However, there is understandable local concern about the sufficiency of these provisions and how and when they might be delivered.

5. SESplan through paragraph 130 states that local planning authorities should seek to minimise the loss of land from the Green Belt whilst balancing the need to achieve sustainability objectives. Where development in the green belt is required to achieve the strategy, effort should be made to minimise the impact on Green Belt objectives and secure long term boundaries. Scottish Planning Policy in paragraph 50 states that " In developing the spatial strategy, planning authorities should identify the most sustainable locations for longer-term development and, where necessary, review the boundaries of any green belt." Whilst the objective of retaining long term robust boundaries for the green belt applies the proposed plan must respond to the strategic development requirements as established through SESplan.

6. It is in the above context, and taking into consideration the conclusions and recommendations of Issue 5 of this report that I have assessed the merit of the representations referred to below. My focus is on the sufficiency of the plan rather on the assessment of whether any alternative site would be preferable to ones proposed by the council. The conclusions on Issue 5 and the identified shortfall in the land supply point to the need to add to the land supply..

7. The sites have been put forward in representations as additional proposals for consideration for allocation but not chosen for inclusion in the proposed plan. Nevertheless in its Environmental Report (Volume 2 and Addendum and Appendices) the council has assessed each of the sites put forward against the same criteria as used for its preferred sites for allocation in the plan. In responding to the matters raised in representations supporting the allocation of these sites, where appropriate I have drawn on these assessments along with the council's Habitat Regulation Appraisal, the Second Proposed Action Programme May 2015 and the council's education and transport appraisals.

8. In summary, each of the sites with unresolved representations under this particular issue heading are not in an SDA and have not been identified by the council for allocation in the proposed plan. It is in this context that I now examine each of the sites concerned in the order that they have been listed above.

RATHO

<u>South of Freelands Road</u>

9. The representation seeks a phased release of the 50 hectare area being put forward for allocation – starting with 180 houses on the western part of the site adjoining the existing houses on the eastern edge of Ratho. The whole area being proposed for allocation is green belt land bounded to the south by the Union Canal corridor. The site in question comprises productive agricultural fields with some mature tree belts, mostly around its fringes. The site, which is generally flat, wraps closely round the north, west and south sides of the landscaped gardens of a free-standing Victorian residential property known as Ashley House. The representations include an illustrative development for the site, which I have taken into consideration along with all the other supporting documentation lodged.

10. I note that both a smaller (western only) and the larger (full area) option being put forward for designation in the plan were assessed by the council in its Environmental Report as part of the housing site selection process for the new local development plan. Based on the available evidence and my own site visits, for the reasons outlined below I

share many of the concerns expressed by the council - which are reflected in the poor overall 'scores' achieved by the site in those assessments by the council.

Site selection

11. Firstly, I note that the whole site is designated green belt land. Furthermore, whilst it abuts the easternmost edge of the built-up area of Ratho village, this land forms part of the wider, unspoilt open countryside to the east of Ratho. In my view the adjoining Union Canal corridor represents a strong edge that would be effective in countering any future pressures for sporadic development to the south of the site. Nevertheless, the northern and eastern margins of the site are less well defined, comprising mostly simple field edges. Whilst in some cases these are tree-lined, I am concerned that they do not offer robust or defensible boundaries to prevent yet further extensions into the wider greenbelt at a future date.

12. On my site visits I noted that there are views through the trees along the canal embankment that provide an open outlook northwards across the site's largely unspoilt and attractive rural landscape, which in my view merits safeguarding. Furthermore, I am concerned that allocation and development of the larger area being proposed would have a highly detrimental effect on the landscape setting of Ashley House. Whilst this house and its designed garden landscape are well screened by trees to the north and west, its open aspect to the south is across open fields to the canal corridor. Based on all of these considerations I conclude that in landscape and visual amenity terms there is insufficient justification for setting aside the green belt designation at this location in order to transform the existing attractive countryside setting here into a major housing development – even if that was on a phased basis proceeding eastwards from Ratho village.

Accessibility

13. The site in question is served only by minor local roads, which are narrow, winding and not intended to act as major transport corridors. Whilst the M8 motorway is located only a few kilometres to the north of the site, there is no readily accessible junction onto the motorway in this vicinity. Indeed, the nearest section of the motorway is mostly in a cutting and so not even generally visible from the site. Most importantly, the canal and motorway corridors, to the south and north respectively, act as major physical barriers severely constraining the scope for significant improvements to accessibility if the site in question was allocated and developed either in part or as a whole. Furthermore, whilst its western edge adjoins Ratho the site generally is poorly served by key service infrastructure, being in open countryside. This combined with its rural location means that most parts of the site are remote from public transport routes and other services and from community facilities, including schools and health care services.

Summary

14. For the reasons outlined above I conclude that the proposed allocation cannot be justified in the new plan, firstly as it would be contrary to the green belt principles set out in the SPP and the SDP policy 12 – which is reflected in paragraph 34 of the proposed plan. Whilst policy 7 of the SDP provides some possibility for green belt releases for housing development this would only be in situations that would not undermine green belt objectives – which in my opinion is not the case here. As outlined earlier, the site in question is also poorly served by public transport and most parts of it are remote from

other key infrastructure services and facilities. The site's development, particularly towards its eastern end, would also in my opinion impact unacceptably on the setting of Ashley House. Based on all of these considerations, I conclude that this is a wholly inappropriate and unsustainable location for major new housing development. I have no evidence of the individual of cumulative transport impact of the proposal or how it would be addressed. The site has not been subject to any formal assessment against environmental objectives and I have insufficient evidence of consultation.

15. These conclusions apply generally to the site as a whole. I also conclude that there is insufficient justification to allocate even the western part of the site nearest to Ratho in isolation at this time – even though that part is located nearest to the local services and community facilities of the village and furthest from Ashley House. This is because I regard the western boundary of the site as providing an appropriate eastern edge for the built-up area of Ratho. Accordingly, I am concerned that even the smaller option of the proposed housing development would represent unnecessary and inappropriate encroachment into the green belt that would set an unfortunate precedent – making any future pressures for further extensions eastwards across the larger area around Ashley House, as now being sought, more difficult to resist. I do not consider the identified shortfall in the housing land supply is sufficient to overcome these concerns.

East of Ratho (land at Ashley House)

16. This suggested site is located immediately to the north and east of Ashley House – and adjoins its landscaped gardens. It comprises grazing paddocks that are bordered by mature trees along the northern and eastern margins. The southern boundary is marked by hedges that separate the gently sloping site from open agricultural fields of the wider countryside beyond. The site is separated by mature woodland from the nearby M8 corridor that runs to the north east of it. Nevertheless, I noted on my site visit that this visual screening did not prevent noise from the motorway traffic being heard on the site.

17. I note that this site was assessed by the council in its Environmental Report as part of the housing site selection process for the new local development plan. Based on the available evidence and my own site visits, for the reasons outlined below, I share the concerns expressed by the council - as reflected in the poor overall scores achieved by the site in those assessments, particularly with regard to green belt criteria and accessibility.

Site selection

18. The whole site is designated green belt land. In addition, whilst it is situated alongside the landscaped gardens of Ashley House, it is physically isolated from the nearest built-up area at Ratho village. Indeed it is best described as forming part of the open countryside characterised by large, relatively flat fields and grazing paddocks, interspersed with mature woodlands and treebelts. The site is clearly visible from the Union Canal's tree-lined embankment path that runs to the south of the intervening fields. Through those trees there is an open outlook northwards across this largely unspoilt and attractive rural landscape, including in the direction of Ashley House.

19. I am concerned that allocation and subsequent development of this site would have a highly detrimental effect on the landscape setting of Ashley House. Whilst this house and its designed garden landscape are well screened by trees from some viewpoints, particularly on its west side, it has a relatively open aspect to the east and south. Based

on all of these considerations I conclude that in landscape terms there is no justification for setting aside the green belt at this sensitive location in order to transform this existing parcel of agricultural/grazing land into a major new housing development. Indeed, I conclude that this would appear highly incongruous in its local setting.

Accessibility

20. The site is located relatively close to the M8 motorway corridor that runs to the north-east of it. Nevertheless there is no readily accessible junction onto this section of the motorway. For vehicular traffic, the site in question is currently served only by the tree lined estate roads leading to Ashley House. Beyond that the links are only via minor local roads, mainly leading to the north and east. To the south and north the canal and motorway corridors, respectively, act as major barriers severely constraining the scope for improvements to accessibility if the site in question became the focus for new housing development of the scale proposed. In short, I conclude that it is not readily accessible, being in open countryside and reached only via minor roads. This, combined with its rural location, means it is remote from public transport routes and other services and community facilities - including schools and health care services. I have no evidence of the individual of cumulative transport impact of the proposal or how it would be addressed. The site has not been subject to any formal assessment against environmental objectives and I have insufficient evidence of consultation.

Conclusions

21. For the reasons outlined above I conclude that the proposed allocation cannot be justified in the new plan, firstly, as it would be contrary to the green belt principles set out in paragraphs 49-52 of the SPP, the SDP policy 12 and paragraph 34 of the proposed plan. I also conclude that the terms of SDP policy 7 in terms of green belt release would not be fulfilled in this case. Furthermore, I am concerned about the site's isolated rural location and remoteness from public services and community facilities. Finally I conclude that its development would adversely impact to an unacceptable extent on the setting of Ashley House. Based on all of these considerations I conclude that this is a wholly inappropriate and unsustainable location for significant new housing development. I do not consider the identified shortfall in the housing land supply is sufficient to overcome these concerns.

<u>West of Baird Road</u>

22. This elongated site comprises mostly a series of sloping agricultural fields forming open countryside located immediately to the south of the M8 road corridor and west of the minor road that links Ratho village with Newbridge. Its southern part includes more steeply sloping ground with mature tree belts. Towards its western end the site wraps round a hill to have part of its southern edge running parallel with a section of the Union Canal, which is set at a lower level. Most of the site occupies higher ground that runs from the trees on the ridge line and slopes down northwards towards the M8 road corridor. The motorway itself is mostly in cutting and also screened by the tree belt that fringes it, leaving partial views of only the west-bound motorway traffic from the site in question.

23. The only house on the site concerned is a large free-standing dwelling sitting amongst the trees on a high vantage point. This affords extensive views westwards in the direction of the Edinburgh International Climbing Arena (EICA) and beyond towards

West Lothian. Indeed the western edge of the proposed site abuts the former Ratho Quarry that is now the EICA that has become a popular rock climbing centre attracting local enthusiasts as well as visitors from further afield. At my site visit I noted that the EICA, including its former quarry face, is set at a lower level and all fenced off from the West of Baird Road site, presumably for safety and security reasons. The EICA is accessed solely from the west – whereas the proposal site is accessed solely from the east along the Ratho to Newbridge road that forms its eastern boundary.

24. I note that the site now being put forward for allocation has changed its site boundaries from earlier submissions, notably to exclude land in the Ratho Conservation Area. I am satisfied that these revised boundaries would mean that views of the site from the Union Canal corridor located to the south of it would be more limited – but not necessarily from all viewpoints. I found on my site visit that the ridge line of the site is partially visible through trees from the Union Canal towpath, but acknowledge that no houses are proposed along that ridgeline. Indeed I note that the proposals include the existing tree areas at and close to the ridgeline being retained rather than developed, with only the lower slopes being put forward for new housing development. That of itself, however, does not justify the allocation of the site, as being advocated in the representation.

Site selection

25. The representations put forward two overlapping site options for consideration – one is for the site as a whole whilst the other concerns solely the much smaller north-easternmost part of it. Both of these sites adjoin the minor road linking Ratho village with Newbridge. The smaller site being put forward seeks allocation for housing development on a former cement works site that is now derelict and so categorised as brownfield. I note that this smaller parcel of land was previously the subject of a proposal for a care home with care cottages. The other representation seeks allocation for the whole site, including the former cement works and extending westwards as far as the boundary with the EICA. The representations for this include Proposed Representation Plans, which I have taken into consideration along with all the other supporting documentation lodged. The sites in question have both been the subject of site assessments by the council.

26. Whilst in principle it would be beneficial to remediate the brownfield former cement works site, I am concerned that the development of housing here would have an adverse impact on views experienced when approaching Ratho from the north along the Newbridge to Ratho road. From here the open aspect of agricultural fields is the main characteristic feature looking westwards, giving this locality a rural setting today. Both the former cement works land and the wider site under consideration form part of the Countryside Area – and I consider that this affords the same level of sensitivity as the nearby defined green belt areas in the vicinity of Ratho village.

27. Accordingly, I am concerned that either of the proposed allocations now being put forward would encroach unacceptably, albeit to differing degrees, into the area of countryside that forms an integral part of the attractive landscape setting of Ratho. Furthermore, the location, scale and form of the proposals means that if either option was allocated in the plan, in my view this would not result in a logical new settlement boundary for Ratho. More specifically, I am concerned that the smaller site if developed alone would be isolated and the larger option would form an illogical and prominent finger of new built development leading westwards across the flank of a wooded ridge and into the wider open countryside. Indeed as the council points out if the larger site was allocated in

the plan and developed with housing this would have the effect of doubling the extent of the townscape area of Ratho. I regard that prospect as irrational in terms of its scale and location - and therefore unjustifiable. In my view, the fact that the site, whether in its smaller or larger version, is bounded to the north by the M8 corridor is not sufficient reason to justify either of these proposed allocations. I therefore conclude that in site selection and related landscape setting terms there is not a justification to allocate for housing development either the smaller or the much larger parcels being put forward in the representations.

Accessibility

28. The smaller and larger site options proposed are each served solely by the minor road linking Newbridge with Ratho, which in both cases also acts as the eastern site boundary. As a result of the road geometry, the smaller former cement works site has poor accessibility from that public road. The access to the larger site would be further to the south along this same road and here the road geometry is less problematic. Nevertheless most of this larger site would remain remote from the exiting transport network as it is only served from that same local road at its eastern end. The fact that these sites adjoin the M8 motorway corridor is of no significance in this regard as there are no access junctions linking with the motorway in the immediate locality. I have no evidence of the individual of cumulative transport impact of the proposal or how it would be addressed. The site has not been subject to any formal assessment against environmental objectives and I have insufficient evidence of consultation.

29. Based on all of these considerations I find it understandable that both of the sites scored poorly in the council's assessment with regard to accessibility to transport infrastructure and to other community services and facilities. In the latest proposals a revision has been made to the larger site area. This has the benefits of removing the site from infringing on the Ratho Conservation Area and reducing views of it from the south. Nevertheless, at the same time it makes the site now proposed more geographically isolated and even less accessible from the existing built-up area of Ratho and its local community facilities and services, including with regard to schools provision.

30. In summary, based on these accessibility and countryside issues that cannot be readily addressed satisfactorily, I conclude that neither the smaller nor the larger site options put forward should be allocated in the new plan. My main concerns, as highlighted above, relate to the wholly inappropriate and inaccessible location of these proposed sites for housing development in the open countryside. Furthermore, the case put forward for the resulting extensive loss of that countryside in the case of the larger site, has not been persuasive in my view, particularly when this would not result in a logical new settlement boundary for Ratho. I do not consider the identified shortfall in the housing land supply is sufficient to overcome these concerns.

<u>South of Ratho Park Road</u>

Site selection and accessibility

31. This broadly rectangular, elongated site is located in green belt on the south-eastern edge of the built-up area of Ratho. Its western boundary runs along a minor public road, known as Dalmahoy Road heading south from the village. From that road heading eastwards the northern boundary of the site initially follows the rear gardens of houses - mostly along Ratho Park Road – that form the existing edge of the village. Further

eastwards again, the northern edge of the site is marked by an un-surfaced track that leads to Ratho Park golf course. The eastern boundary of the site is defined by trees and hedges alongside some isolated residential cottages on the western perimeter of the golf club's parkland estate. The site in question comprises gently sloping agricultural fields with the southern edge marked simply by a lower area of open scrubland - before the fields located further to the south of that rise up on the opposite side of the valley bottom. The representations for this and the Ratho Park Road site – considered later - included a concept development framework, along with a design and access statement – both of which I have taken into consideration, along with the landscape and visual appraisal and all the other supporting documentation lodged.

32. The site being proposed south of Ratho Park Road is situated reasonably close to the village centre of Ratho. As such I find that the north-westernmost parts of the site would be reasonably accessible to existing public transport services as well as to other local community facilities and services. That accessibility would diminish progressively heading eastwards and southwards across the sites – and I note that this is reflected in the council's assessment that the site overall 'scored' low in terms of its accessibility and access to public transport.

33. The site has not been assessed through the council's Education and Transport Appraisals. That said the submissions suggest that infrastructure provision would not present a significant constraint in this location. Nevertheless, the availability of infrastructure is not the only consideration. I have significant concerns about the site's suitability for allocation, as outlined below, which in my overall assessment outweigh those infrastructure considerations. The site has not been subject to any formal assessment against environmental objectives and I have insufficient evidence of consultation.

34. I acknowledge that the site's position is such that new housing built directly to the south of the existing housing would be below the skyline and only readily visible when approaching Ratho from the south along the minor Dalmahoy Road. Nevertheless I find that the scale and location of the proposed development as a whole would have a significant adverse effect on the landscape setting of Ratho. I am most concerned about the visibility of new residential development on the eastern half of the site in question, particularly given the landscape considerations elaborated below.

35. The adverse impacts in landscape and visual amenity terms that would result from allocation of this site for housing development would be exacerbated because the eastern half of the site does not currently have existing housing development immediately to the north of it, only a track that follows the crest of an east-west oriented ridge line. The proposal is for new housing to extend northwards close to that ridge line. This would make it highly visible particularly from the south where there is currently no built development along or near this section of the ridge line. I am also concerned that this proposal would extend the main built-up area of Ratho eastwards - and in my view the case for doing so has not been satisfactorily justified in landscape and visual amenity terms in the submissions lodged.

36. A key criterion to be considered within the overall assessment is whether or not the site can be integrated into or be satisfactorily in keeping with the character of the settlement and the local area. Ratho is presently characterised by its east-west access following the ridge line and the proposal, whilst extending the settlement eastwards – about which I have commented above, would also extend it southwards. I share the

council's concern that this would distort the characteristic form of Ratho – in my view unnecessarily and to its detriment in terms of the distinctive, long established profile of the village.

37. I note that the southern boundary of the site concerned runs parallel with the valley bottom, which is a reasonably clearly defined break in the geometry of the local landform. Nevertheless, I note the Scottish Planning Policy (SPP) statement in paragraph 51 that field boundaries and hedgerows rarely provide a sufficiently robust boundary for green belts. I am not persuaded that in this particular case appropriate structural planting could be satisfactorily put in place along its eastern and southern boundaries to provide a new logical and defensible green belt boundary enclosing the proposed allocation. I regard the existing green belt edge around this part of Ratho as being important to safeguard against inappropriate housing development encroaching onto the open fields located to the east and south of the main built-up area of the village.

Overall conclusions

38. Having had regard to all of the above considerations my overall conclusion is that on balance there is insufficient justification to allocate this particular site for housing development for the reasons stated. Immediately to the north of the eastern part of the site – on the opposite side of the ridge line track leading eastwards from the village to Ratho Park Golf Club - there is another open field and that is also being put forward for allocation (under the heading 'Ratho Park Road') through a separate representation. Consideration of that smaller field is dealt with in its own right below. Whilst the 2 sites exhibit significant differences, notably in terms of their visibility and landscape setting, they are contiguous land parcels situated on either sides of the same ridge that is prominent in the local landscape. Accordingly I find that they need to be examined in tandem to some extent - and my reasoning and conclusions above takes these factors into consideration.

<u>Ratho Park Road</u>

Site Selection and Accessibility

39. This broadly rectangular, gently sloping site is arable farmland that is in the green belt. It is located immediately to the north-east of another proposed site known as "South of Ratho Park Road" that was considered by me in its own right earlier. There I noted that the representations included supporting documentation related to both sites, that I have taken into consideration. These two sites share a common boundary formed by the un-surfaced track that leads east from Ratho Park Road to Ratho Park Golf Club. The golf club curtilage forms the eastern boundary of the site now in question. The site's western boundary is defined by the rear gardens of existing houses on East Croft, whilst on its northern fringe is the Union Canal corridor – although the canal tow path is not directly accessed from this southern side.

40. This proposed site is situated on the eastern edge of the built-up area of Ratho village, such that it is reasonably accessible to public transport services and other local community facilities and services. These alone are not sufficient reasons, however, to allocate the site for residential development. In that regard, firstly I am concerned that the site occupies an elevated, open position that makes it highly visible in the surrounding landscape when viewed from the north - including from the canal corridor nearby, as well as from further afield in that direction.

41. I am also particularly concerned that the proposal would impact adversely on the character and open setting of the adjoining section of the Union Canal corridor. At present this locality is not within the built-up area of Ratho. Indeed it affords excellent visual amenity being the first section of the wider rural environment that continues eastwards from Ratho past the Ratho Park Golf Course to the south and open fields to the north. There has been some new housing to the north-west of the site, but the majority of the area immediately to the north of the Ratho Park site is agricultural fields that continue into the wider countryside as the canal corridor leads east from here towards Edinburgh. Whilst there are rail and motorway corridors crossing this rural landscape they are set at lower levels so do not detract significantly from the overall appearance of this attractive countryside characterised by open fields and tree belts. In this context the site concerned forms an important part of the green belt, in my view. Furthermore, whilst robust new green belt boundaries could potentially be drawn excluding this site, this is not of itself sufficient reason to remove it from the green belt – particularly when to do so would be detrimental in landscape and visual amenity terms for the reasons set out above. Other relevant considerations are outlined below.

42. Its southern boundary, being a ridge top, means that whilst much of the site is not readily seen from rural areas to the south, housing development close to this ridge would be risk being visible. Indeed in my opinion that would make such development unacceptable in visual amenity and landscape setting terms, even though the pattern would be continuing the east-west axis that characterises Ratho village's existing form. I acknowledge, however, that careful site planning and layout could avoid the particular problems associated with breaches of the ridge line. Nevertheless, in overall terms similar reasoning has formed part of the basis for me reaching conclusions – detailed earlier in this report - that also do not support a housing allocation for the adjoining land immediately to the south of the ridge track that forms the southern boundary of the site now in question.

43. In summary, given its elevation and associated prominence, together with its important role as part of the green belt and gateway to the wider unspoilt landscapes to the north and east, I conclude that the case for releasing the Ratho Park Road site for housing development is not persuasive. Indeed I am concerned that this would detract unacceptably from this part of the green belt and the wider landscape setting. I also conclude that this would impact adversely to an unacceptable extent on the visual amenity enjoyed locally, including by those using the Union Canal and its towpath. Accordingly, I conclude that, on balance, any benefits of promoting housing on the site would be heavily outweighed by those significant adverse impacts - which in my view could not be mitigated sufficiently by careful site planning, boundary treatments and additional landscape planting. I do not consider the identified shortfall in the housing land supply is sufficient to overcome these concerns.

NEWBRIDGE/RATHO STATION

44. There are two sites being promoted by the same developer as prospective housing land allocations to the south of Harvest Road. These sites are located either side (north and south) of an operational rail corridor - and they are known as Ratho Station North (site 6) and Ratho Station South (site 7), respectively. Each is considered in turn below.

Ratho Station North (site 6)

Site Selection and Accessibility

45. This is a roughly triangular, overgrown paddock with some trees and bushes along its boundaries. This small, low-lying land parcel is wedged between some detached houses to the west, Harvest Road to the north and east and an operational rail corridor in a cutting immediately to the south. Harvest Road forms part of the minor public road that links Newbridge to Ratho village. At my site visit I noted that directly opposite the site in question, on the other side of Harvest Road, is a modern industrial area that appears to be busy with a range of commercial businesses.

46. The site in question is designated as being within a Countryside Policy Area that extends further southwards and westwards. Whilst I acknowledge that the site is reasonably close to public transport services, I am concerned that its only access is close to a sharp bend on Harvest Road and at a point where this road also has a relatively steep gradient as it descends from the bridge crossing over the adjoining rail line at the eastern corner of the site.

47. The low-lying nature and screening of the site mean that it is well contained, such that its development would not have unacceptable adverse impacts on visual amenity or on the local landscape setting. I also note that there is a small group of long-established houses situated immediately to the west of it. Nevertheless, I find that those considerations do not outweigh the fact that the site is remote from the nearest residential settlement at Ratho Station – and it will remain separated from it by the intervening industrial estate complex. In my view these factors together with the access constraints outlined earlier mean that the site is isolated geographically and not readily accessible to most local community facilities and services – even though there is reasonable access to public transport. Furthermore, the site is very small – well below the scale of most residential allocations in the proposed plan.

48. Based on all of these considerations and having regard to the policy context, I conclude that allocation of this site for housing in the proposed plan would not be appropriate. In policy terms I find that an allocation in this case would not accord with the principles of the Scottish Planning Policy of 2014 (SPP) and the Strategic Development Plan. I note that its policy 7 concerns Other Countryside Designations. The SPP encourages local development plans to allocate appropriate sites to support sustainable mixed communities and SESplan's housing strategy, including its policy 7, echoes these principles. In summary, I conclude that allocation of this isolated site would not represent such an opportunity and so would be inappropriate. I do not consider the identified shortfall in the housing land supply is sufficient to overcome these concerns.

Ratho Station South (site 7)

Site selection and accessibility

49. This site is also accessed from Harvest Road, immediately to the east and it is situated directly to the south of site 6 at Ratho Station North. Indeed these sites are only separated from one another by the intervening rail corridor cutting, which forms the northern boundary of the Ratho Station South site. This site, which is larger in area than site 6, comprises gently sloping grass pasture. Its southern boundary is defined by a private access road leading west from its junction with Harvest Road to Hillwood Quarry,

located nearby. This is an operational quarry and during my site visit I saw several HGV lorries using this access road over a short period, indicating that the quarry is being actively worked and the associated HGV traffic significant. This neighbouring activity raises noise, dust and other environmental concerns, as well as road safety issues in respect of the site now in question. In any event, those issues would need to be satisfactorily addressed before this site was considered potentially suitable for development as a new housing site – whether as a formal allocation or through the development management process in response to a planning application.

50. From the adjoining public road (Harvest Road), heading north from Ratho, the quarry to the west and the industrial areas to the north are not visible and site 7 is simply open farmland that forms part of the wider rural landscape. This, together with the fact that the site is overlooked from Harvest Road, leads me to be concerned that its development for housing would impact adversely on the landscape setting and local character of the immediate area, which is characterised by rolling farmland giving the appearance of being remote from any settlement or built development. Indeed, as well as being adjacent to a quarry approach road, the site is isolated from the nearest residential settlement at Ratho Station – and will remain completely separated from it by the intervening road, the rail corridor and the industrial estate complex to the north. In my view these factors in combination lead me to conclude that despite the site being close to a public transport route in reality it is isolated geographically and not readily accessible to local community facilities and services.

51. Accordingly, I conclude that allocation of this site for housing development would not be appropriate – and that such an allocation would not accord with the principles of the Scottish Planning Policy and the Strategic Development Plan – for similar reasons to those articulated above in respect of site 6. My concerns are reflected in the poor scoring of the site against the council's checklist of site assessment criteria. In summary, the SPP encourages local development plans to allocate appropriate sites to support sustainable mixed communities and SESplan's housing strategy echoes these principles. I conclude that allocation of this isolated site would not represent such an opportunity and so would be inappropriate. I do not consider the identified shortfall in the housing land is sufficient to overcome these concerns.

Balerno /Currie/Juniper Green

<u>Strategic infrastructure issues, environmental and amenity considerations affecting the suitability of sites for allocation in this area</u>

52. One representation raises a general concern about the pressure on existing roads, schools and local amenity in this area that, he contends, would be exacerbated if additional housing was promoted here on infill sites. He would prefer development pressures to be met instead on brownfield sites – such as at Blinknbonny and Lanark Road. Whilst acknowledging these and related concerns he has highlighted, I note that the proposed plan states (on Page 21) that in order to meet the projected housing requirement the approach taken is to give priority to brownfield sites first, then sites within the Strategic Development Areas and finally locations elsewhere in the city. This approach is consistent with the principles of the Strategic Development Plan, SESplan. These principles and associated strategic infrastructure requirements are explored in detail elsewhere in this report – notably under Issues 5, 19 and 20 - and I rely on the report's conclusions and recommendations set out there.

General Principles

53. I note that allocated sites shown in the proposed plan were selected by the council through its assessment process. This established a range of criteria against which the suitability of candidate sites for inclusion could be assessed and compared. The criteria used for the housing site assessment are set out in Tables 6 and 7 of the Environmental Report (Volume 1). The council assessed these sites through its Environmental Report Second Revision Volume 2 June 2014. For sites selected and allocated in the plan – including sites HSG 35, 36 and 37 in the area of concern now being considered - a separate, statutory assessment of their likely environmental effects is set out in Appendix 3 of Volume 1 of the Environmental Report. More detailed consideration of those 3 sites in the Currievale is found elsewhere in this report under Issue 12 and I rely on the conclusions and recommendations set out there.

54. I understand the significant concerns about traffic impact given the extent of congestion on the Balerno-Currie-Juniper Green corridor into the city and from Riccarton Mains Road to Sighthill. In terms of access to higher order services and employment locations the relative distance from the city and a more constrained choice of bus routes means that the south-west compares relatively unfavourably to more accessible locations elsewhere in the city particularly in the identified Strategic Development Areas. However all three allocated sites in this locality (HSG 35, 36 and 37) were considered to have access to a main bus route and to the Currie rail halt enabling other transport choices rather than reliance on the private car. The council's Transport Appraisal June 2014 sets out a number of actions to address the transport impacts of those 3 proposals. The council identifies a south-west contribution zone through it Action Programme. All sites being allocated and developed in this area are expected to contribute to an increase in the junction capacity of Gillespie Crossroads based on increasing the efficiency of the traffic signals through installation of MOVA (Microprocessor Optimised Vehicle Actuation). Contributions are also required to an extension to the park and ride facility at Hermiston – and specific mitigation measures were identified in respect of each of the allocated sites in order to satisfactorily address projected transport impacts (as detailed in Issue 12).

55. With regard to impacts on the capacities of local schools I note that the action programme identifies a South West Edinburgh Education Contribution Zone within which sites should contribute to a 5 class extension to Currie (ND) Primary School (SCH10). The new housing sites within South West Edinburgh are served by a single nondenominational secondary school, Currie High School. As detailed in Issue 12, the council's Education Appraisal states that Currie High School is projected to have spare capacity to accommodate the pupils from the allocated new housing sites shown in the plan. The council's further submissions through FIR 04 indicate that significant additional capacity would be required were the plan to include the further sites which are assessed below.

56. In summary Issue 12 concludes that there was no technical or expert evidence to dispute the confidence of the council that identified traffic and education impacts can be appropriately addressed in respect of the sites allocated in the proposed plan for this particular area. These general infrastructure requirements are detailed in the General Principles for South West Edinburgh as detailed through the recommendations on Issue 21. Adding further proposals would require further assessment of cumulative impact and the required mitigation. Our conclusions elsewhere in this report reflect the emphasis placed on Strategic Development Areas recognising that these areas, due to their enhanced accessibility, are generally better placed to meet any more strategic scale of

additional housing land release. This has been a consideration in my assessment of the additional sites suggested through this issue. These are assessed in the context of the not insignificant proposals for this area already included in the plan and added through recent planning appeal.

57. The plan makes provision for additional sites, including infill sites, to come forward subject to the criteria set out in Hou 1. When detailed proposals for major new housing developments are put forward as a planning application for a particular site they are required to provide supporting documentation, for example a Transport Assessment, to demonstrate how the development would be accommodated in the local area in terms of traffic generation and junction capacities – as well as having to satisfactorily meet other relevant criteria, including in respect of drainage, landscaping and amenity amongst other matters. Such applications and their associated master plans are assessed by the planning authority on a case-by-case basis against the policies of the plan before planning permission is granted. Based on all of these considerations, and for the reasons elaborated below, I conclude that there is no justification to modify the proposed plan in response to the issues raised in the representations on these matters – beyond those recommendations set out under Issues 5,12,19 and 20.

58. The representations lodged in respect of the Currievale Riccarton Garden Centre site and Currievale were supported by detailed analyses of documentation - including a transport and traffic appraisals and illustrative masterplans - all of which I have taken into consideration. I note that the council's Site Assessment headed Currievale assessed these two green belt sites along the northern edge of Currie's existing built-up area now being put forward by the same developer for housing allocation in the plan – discussed in turn below. I have also had regard to the findings and recommendations of the Green Belt Study – which I note identified, at least in landscape terms, some capacity for new housing development to the north-east of Currie. Nevertheless, it did not support the bulk of new housing development to be north-west of Currie, as now being proposed in the representations. In any event I acknowledge that whilst the Green Belt Study is relevant that study was a landscape assessment that was not based in the SPP and SESplan contexts of having to meet strategic housing requirements - that brings into consideration additional sustainability criteria.

<u>Currievale (Riccarton Garden Centre)</u>

Site selection and accessibility

59. This representation seeks release for housing development of a wedge of green belt land along the northern edge of the built-up area of Currie. It adjoins allocation HSG 36 on its western side and an operational railway line to the north, as well as allocation HSG 35 to the south-east. The site in question is crossed by large electricity pylons and power transmission lines. The representation makes reference to this site having been previously identified as necessary to complete the proposed Currie Link Road to Riccarton Mains Road, associated with the existing A70 trunk road – which, I note, is no longer being promoted as a new road corridor**.** I acknowledge that the representations have been supported by detailed documentation, including an illustrative masterplan along with planning, urban design and transport appraisals seeking to demonstrate how the site might be developed in a cohesive and sustainable manner. The site has not been subject to any formal SEA assessment and Circular 6/2013 advises me that any recommendation to include this site would require sufficient environmental information and evidence of public consultation.

60. In its favour the site does benefit from containment in terms of its views from further afield, strong defensible boundaries and its proximity to Currievale rail station Nevertheless, I have a number of outstanding concerns with regard to its possible allocation. Firstly, I am concerned about the large scale of this proposed site at this particular location when a significant amount of new housing development is already allocated in the immediate vicinity. Development of those sites will add significant pressure to local roads and other local infrastructure and community facilities, in any event without the site now in question acting cumulatively in that regard. Notwithstanding its proximity to allocations HSG 35 and 36, in my view the majority of the relatively large site in question is not conveniently located for other forms of public transport and its peripheral location on the edge of the urban area means that it is also not readily accessible to a range of other community facilities and services. Furthermore, the overhead power transmission lines crossing the fields of the site in question still represent significant constraints. In my view that, along with the changes of levels across the site, would constrain and fragment the potential of the remaining developable parts of the site for housing development.

Green belt

61. The site would be a significant extension into the green belt. I note that HSG 35 and 36 already result in some northerly expansion of the urban area but these are relatively small incursions contained within the landscape to an extent that does not encroach significantly into the countryside. Due to their scale and location I consider that they can achieve better integration with the urban area as well as access to public transport. One of the objectives of green belt, as set out in paragraph 34 of the plan, is to direct planned growth to the most appropriate locations and support regeneration. In this context, I am not persuaded that the release of this area of greenbelt in this peripheral location would be justified. It would simply add more residential development to a peripheral local area that is already well provided for in terms of new housing allocations. I consider there are more appropriate and sustainable locations in which to direct any further significant requirements for housing land. The development plan spatial strategy, whilst recognising a role for other areas, places emphasis on the strategic development areas in this respect. Consequently I do not consider the site should be released for housing. The balance of considerations leads me to conclude that it should be retained in the green belt given the role of the site and its landscape setting in preventing any further significant urban expansion on this more peripheral edge of the city.

62. Accordingly, even if it was demonstrated that the impacts of this site could be addressed, including cumulative impacts, I do not consider that this is an appropriate housing site or that its release from the green belt is justified. I do not consider the identified shortfall in the housing land supply is sufficient to overcome these concerns.

Currievale

Site selection and accessibility

63. This elongated wedge of sloping green belt land, extending to 30 hectares, comprises agricultural fields situated between an operational rail corridor immediately to the north, the HSG 36 allocation to the east and existing residential areas to the south. It extends westwards as far as the northern end of site HSG 37. The site's western boundary is marked by a simple field boundary. Large parts of the site are traversed by major power transmission lines and pylons. In support of its allocation for a phased

development of 420 houses, the representation is accompanied by detailed supporting documentation and an illustrative masterplan. Amongst other matters, the case put forward in support of its allocation points to the site's defensible location and containment as well as its linkages to the local road network and public bus services. The representation also makes reference to this site having been previously identified as necessary to complete the proposed Currie Link Road for the A70 trunk road – which, I note, is no longer being promoted as a new road corridor**.**

64. I acknowledge that the site has strong boundaries to the north, east and south and I am persuaded that in principle its allocation would not impact to an unacceptable extent on the wider landscape setting. Nevertheless, I have serious concerns regarding the merits of such an allocation which reflect my concerns as stated above on Riccarton Garden Centre. Firstly, in addition to it having a peripheral location I am concerned about the very extensive scale of this proposed site when a substantial amount of new residential development is already allocated in the proposed plan in the area. Development of those sites will add significant pressure to local roads and other local infrastructure and community facilities. In that context, the site now in question would act cumulatively in further loading existing infrastructure and the capacity of local services. I am also concerned that such a large-scale housing development at this location, even on a phased basis, would be out of keeping and disproportionate to the limited overall settlement size of Currie.

65. Notwithstanding its proximity to allocations HSG 36 and 37, in my opinion the site in question is for the most part isolated and geographically remote, even though the site's eastern end is located reasonably close to Currievale rail station. In particular, I find that the majority of this relatively large, elongated site is not conveniently located for other forms of public transport and its peripheral location on the edge of the urban area means that it is also not readily accessible to a range of other community facilities and services.

66. Furthermore, I am not persuaded that the site's western boundary is well defined or defensible, being a simple field boundary separating it from similar agricultural land leading into the wider countryside immediately to the west of that. I am also concerned that the development potential of the site and its layout is likely to be compromised to an extent by being on 10-15% gradient north-facing slopes as well as being fragmented by the need to take account of the power lines that traverse it. The site has not been subject to any formal SEA assessment and Circular 6/2013 advises me that any recommendation to include this site would require sufficient environmental information and evidence of public consultation.

Green belt policy

67. I share the council's view that the existing green belt boundary in this location is defensible - for the reasons it has cited. More specifically I conclude that the proposal would be contrary to the principles of paragraph 34 of the proposed plan and policy 12 Green Belts of SESplan. Furthermore, SESplan policy 7, criteria (a) and (b) permits housing development to help maintain a 5 year effective housing land supply, but only where local character and green belt considerations are addressed satisfactorily. I am also not persuaded that the required release of this large area of greenbelt is merited when this would be simply adding more residential development to a peripheral location that is already well provided for in terms of new housing allocations in the proposed plan. As stated earlier, in any event this would achieve only fragmented parcels of housing development - reflecting the constraints imposed by the pylons and powerline corridors

and associated stand-offs that limit the site's development potential. Furthermore, in my view this also means that the quality of the residential environment that could be created here would be compromised significantly. The enforced compromises to the layout achievable are confirmed in the illustrative plans accompanying the proposal. In summary, I conclude that the release of this site from the green belt to be allocated for housing development cannot be justified, for the policy reasons outlined and taking into consideration other relevant matters elaborated earlier.

Conclusions

68. Accordingly, even if it was demonstrated that the local service infrastructure – for example in terms of roads and schools capacities and drainage systems – could be accommodated or that I had sufficient environmental information or evidence of public consultation, I conclude that there is insufficient justification for this site to be released from the green belt and allocated for housing development. I do not consider the identified shortfall in the housing land supply is sufficient to overcome these concerns.

Ravelrig Road

69. There is a single representation proposing allocation of this site in the green belt for housing development in the new plan. This was not accepted in principle by the council and it also refused a planning application lodged by the same developer seeking development of this site for 120 houses. I note, however, that the council's decision notice refusing to grant planning permission was appealed. That appeal (PPA-230-2140) was upheld - with the application becoming the subject of a "Notice of Intention to grant planning permission" issued in July 2015. This stated the Reporter's intention to allow the appeal and grant planning permission in principle, subject to conditions following the signing and registering or recording of a planning obligation under section 75 of the Town and Country Planning (Scotland) Act 1997 to cover specific transport related matters. Those legal requirements were subsequently met satisfactorily leading to planning permission in principle being formally granted on 18 December 2015. This establishes the principle of housing development on the site, although the exact number of units may change when a detailed scheme is drawn up and formally approved by the planning authority.

70. Given the current status of the site in question, I conclude that there is no need or justification for me to consider the representation further in any detail. Instead in order to reflect the updated position and for the reasons outlined below, I conclude that the plan should be modified to formally allocate this site for residential development with an indicative capacity of 120 units. I am aware that a contrary view has been expressed by the council and others - that sites not previously allocated that are granted planning permission prior to the adoption of the plan should be regarded as windfall sites.

71. In response I note, firstly, that the site in question is shown as green belt land in the proposed plan and was the subject of representations to the proposed plan. I also note that Scottish Planning Policy's glossary defines windfall sites as "sites which becomes available for development unexpectedly during the life of the development plan period which are not identified individually in the plan." I find a variation on the definition of windfall sites set out in SESplan glossary where reference is also made to sites "not anticipated to be available when the plan was being prepared." In my view that is open to possible interpretation and therefore less clear than the SPP definition which is to be preferred as the national guidance on such matters. In this context I conclude that a

formal allocation of the site in question is appropriate – as reflected in my recommendations - as in my view it does not meet the criterion to be termed a windfall site.

72. In making my recommendations regarding the Development Principles to be applied to the development of this site, I have had close regard both to the General Development Principles for South-West Edinburgh and my recommendations include a cross reference to these. I have also taken account of the site brief for Currie/Balerno as well as the planning conditions attached to the planning permission granted recently for the development of this site on appeal. The assessment and reasoning set out in that decision notice included reference to a wide range of relevant matters including, amongst others, transport and other infrastructure provision and cumulative impact considerations as well as landscape and visual impact. These were amongst the considerations that provided the basis for a number of the detailed planning conditions attached to that permission when it was granted. Accordingly, my recommendations for the Development Principles to be specified for this site's allocation in the proposed plan reflect these various considerations.

Cockburn Crescent

Site selection

73. This gently sloping rectangular site comprises arable fields located on the southern edge of the built-up area of Balerno. Its eastern and southern boundaries are defined by Mansfield Road and Cockburn Crescent, respectively, whilst its southern and western edges are marked by trees and bushes. In this context I am satisfied that the site has clear, defensible boundaries and that housing here would continue the recent pattern of development in Balerno reflected in the modern housing that currently fronts onto Cockburn Crescent. In support of the proposed allocation the representation includes a range of detailed supporting documentation – that I have taken into consideration - and draws attention to the fact that these considerations were endorsed in the appeal decision notice issued in respect of this site (PPA-230-2112) in 2014. I note, however, that the same decision letter in refusing planning permission for housing development on the site in question raised a number of over-riding concerns relating to green belt policy and other issues. I will now consider the merits of the case for allocation of the site in the new plan.

Transport and Accessibility

74. I noted at my site visit that there is a bus stop near the junction of Cockburn Crescent and Mansfield Road. I also note the council acknowledges that public transport accessibility for the majority of the site is acceptable and I have no reason or basis to take issue with that assessment. More generally, having examined the available evidence including the council's detailed site assessment in its Environmental Report, I am satisfied that there are no overriding transport or accessibility reasons that, of themselves, would justify refusal of the request for allocation of this site in the new plan.

Green belt and related landscape considerations

75. The site is designated as green belt and is located within the "Candidate Special Landscape Area, Pentlands." In this context the council in its assessment highlights a number of concerns regarding the adverse impacts that would result if the site was allocated and developed for housing. In support of its position on these matters it quotes

extensively from the 2014 appeal decision notice (PPA-230-2112).

76. In that decision notice the Reporter lists a number of reasons why the proposal would fail to meet in full the policy requirements of the proposed plan as well as with regard to SESplan policy 12 and its related the green belt objectives. The problems cited in those regards are wide-ranging but include reference to the proposal impacting unacceptably on the rural setting of Balerno, eroding the open views across what would become a narrower agricultural buffer between the built-up area and the wilder character of landscape of the nearby Pentland Hills.

77. I endorse those and the related detailed concerns that the council and the appeal Reporter have highlighted and reported more fully – which I do not need to repeat here. Furthermore, SESplan policy 7, criteria (a) and (b) permits housing development to help maintain a 5 year effective housing land supply, but only where local character and green belt considerations are addressed satisfactorily – which in my view would not be achieved in this particular case.

78. In summary, based on all these considerations, I conclude that on balance the fact that the site would continue an established pattern of development in Balerno that would be accessible is outweighed by the unacceptable impacts on the green belt and the rural setting immediately around Balerno. Indeed I am concerned that such an allocation would amount to a further, irreversible encroachment of the built-up area of Balerno towards the nearby Pentland Hills – which I regard as unacceptable. Those overriding concerns include the significant diminution of attractive open views currently enjoyed from Cockburn Crescent and this section of Mansfield Road southwards across the countryside - comprising agricultural fields and tree-belts - towards the skyline of the Pentland Hills.

79. Given the above conclusions, which in combination rule out the principle of this allocation, I have not given close consideration to other matters such as educational provision, and the adequacy of other infrastructure capacities of local community facilities and services that would need to be satisfactorily addressed prior to any approval of this site for housing development, even in principle.

Harlaw Gait

Site selection and accessibility

80. This site comprises a relatively isolated grazing paddock set in mature woodlands towards the south-east edge of Balerno. I note the argument put forward that the site currently contributes little in terms of recreational amenity. I also acknowledge that it is a relatively small pocket of land heavily screened by existing mature trees - and in that context it has been argued that its loss for housing development would not necessarily result in a significant diminution of the effectiveness of the wider green belt.

81. In my view, such considerations do not of themselves provide sufficient justification to allocate the site for housing development in the new plan. Indeed I have a number of significant concerns in that regard. Firstly, whilst it can be reached on foot through local woodland walkways and is reasonably close to public transport, I do not consider the site to be readily accessible by road. The supporting documentation accompanying the representation indicates that the proposed vehicular access to the site would be via a cul-de-sac that currently serves only a small group of new houses located on Harlaw Gait, off

Harlaw Road. That road is a narrowly configured minor public road. leading uphill out of Balerno towards the wider rural hinterland. In summary, based on the available evidence, I am not persuaded that this combination of Harlaw Road and Harlaw Gait would offer an acceptable vehicular access to serve the site in question satisfactorily in terms of its geometry and with a view to safeguarding local amenity for existing residents. Furthermore, the constraints imposed on Harlaw Road by the configuration of the local landforms – including its changes of level and watercourses - render these shortcomings difficult to overcome in my view, even if the site was deemed otherwise appropriate for development.

Green Belt and related landscape consideration

82. This is green belt land and in my opinion the existing green belt boundaries in this locality are logical and clearly delineated. Those boundaries are not compromised by the existing small grouping of new housing immediately to the south as those houses on Harlaw Gait are backed by the strong line of mature trees formed by Bog Wood which defines the green belt boundary. In contrast, in my view allocation and development of the site in question would clearly and unnecessarily breach that existing strong green belt boundary. The site is located within the Currie Farmland Landscape Area and a detailed assessment has confirmed that it does meet green belt criteria and associated principles for green belts summarised in paragraphs 49 and 52 of the Scottish Planning Policy (SPP), SESplan policy 12 and paragraph 34 of the proposed plan. I also find that this site contributes significantly to the local landscape setting of Balerno. In strategic terms this site also forms part of the farmland and woodland belt that acts as a transition from the built-up areas of Balerno to the wilder landscapes on the steeper slopes leading to the nearby Pentland Hills.

83. In summary I conclude that the proposal would fail to meet in full the policy requirements of the proposed plan as well as with regard to SESplan policy 12 in terms of the green belt objectives and associated principles. Furthermore, SESplan policy 7, criteria (a) and (b) permits housing development outside the SDAs to help maintain a 5 year effective housing land supply, but only where local character and green belt considerations are addressed satisfactorily – which is not the case here in my view. Accordingly, I conclude that the site is not appropriate for allocation for housing development in the new plan.

84. Given the above conclusions, which rule out the principle of this allocation, I have not given close consideration to other matters such as educational provision, and the adequacy of other infrastructure capacities of local community facilities and services that would need to be satisfactorily addressed prior to any allocation of the site for housing development.

Muir Wood Road

Site selection and accessibility

85. This wedge of flat green belt land, extending to more than 3 hectares, is in agricultural use and marks the division between the built-up area of Currie and that of Juniper Green, located immediately to the east. Indeed the site is well defined by existing residential areas immediately to the east, south and west. Its northern boundary is marked by the trees and bushes that separate the site from Baberton golf course. Another key feature of the site is the presence of major electricity pylons and power

transmission overhead cables that traverse it.

86. In support of the proposed allocation, the representation lodges some detailed documentation that I have taken into consideration. As part of its case it argues that the site is well contained in the landscape and is effective - as well as being situated close to existing bus networks and other local community facilities and services. Whilst that may the case, these do not provide sufficient justification to allocate the site for housing development. Indeed, having considered all the relevant documentation I have a number of significant concerns in that regard.

87. Firstly, whilst there is a need for the new plan to identify sufficient land to meet projected housing land requirements identified for the SESplan area over the plan period, the development plan policies state a strong presumption that new housing releases should be directed to the Strategic Development Areas (SDAs) defined in the SESplan. The site in question does not fall within an SDA. In addition, for reasons elaborated below, I conclude that the proposed allocation would not meet the terms of SESplan policy 7, criteria (a) and (b) which permits housing development outside the SDAs to help maintain a 5 year effective housing land supply, but only where local character and green belt considerations are addressed satisfactorily. I consider the green belt designation in more detail below.

88. Meanwhile, more generally I am concerned that development of this site would remove the only remaining wedge of land maintaining a degree of separation between the long established and distinct villages of Currie and Juniper Green. The site remaining as open agricultural land prevents coalescence of their built-up areas – and in my opinion it performs an important strategic role in that regard. In my view it should continue to do so as this is beneficial in helping to maintain the individual identity of each of these long established villages within the city of Edinburgh. These are amongst the principles outlined in paragraph 34 of the proposed plan where the purposes of the green belt are stated.

89. Furthermore, I am concerned that the site's development, if allocated, would need to be in separated parcels of housing taking account of the pylons and power line corridor that crosses it - and the associated "stand-offs" required. As well as constraining the site's development potential in overall terms. the quality of the residential environment created here would be compromised significantly by the on-going presence of the electricity pylons and lines that dominate a large tract across the site.

Green Belt

90. As stated earlier, the site in question, as well as being green belt land, performs an important local and strategic role – firstly locally ensuring a degree of separation is maintained to differentiate the built-up areas of Currie and Juniper Green as discussed earlier. I consider that its green belt designation provides an additional safeguard in this respect. More widely the arable field here forms part of the Baberton Farmland landscape character area which extends into open rolling farmland and also includes the adjoining golf course to the north of the site. I consider that, notwithstanding the presence of electricity pylons and powerlines, this performs an important role in providing an attractive outlook from the surrounding residential areas that leads into the wider rural landscape. Whilst the greenbelt boundaries in this locality are not always strongly defined, in my opinion this does not diminish significantly the value of this visually well contained wedge of land as part of the green belt - which would be lost if the green belt

boundary was redefined to run along the tree belt marking the southern edge of the adjoining golf course.

91. In summary, based on the available evidence, the arguments outlined above and my own site visits, I conclude that the site meets the purposes of and criteria for green belts summarised in paragraphs 49 and 52 of the Scottish Planning Policy (SPP). Accordingly, whilst development of the site for housing may not have a significantly adverse effect on wider views of the green belt from further afield that consideration is outweighed by the arguments summarised above for retaining it within the green belt. I conclude that the proposed allocation, in addition to failing to accord with the policy guidance on green belts set out in the SPP, would also not be consistent with paragraph 34 of the proposed plan and would not satisfactorily address criteria (a) and (b) of policy 7 of SESplan.

92. Given the above conclusions, which rule out this allocation, I have not given close consideration to other matters such as educational provision, and the adequacy of other infrastructure capacities of local community facilities and services that would need to be satisfactorily addressed prior to any allocation of the site for housing development.

EDINBURGH GARDEN DISTRICT

General, South and West

93. One representation puts forward a detailed case for the so-called Edinburgh Garden District (EGD) – located west of the A720 road and including the open area of farmland straddling a section of the Union Canal here – as offering an opportunity to promote a wide mix of uses and as part of this to create jobs and make a significant contribution to maintaining the 5 year housing land supply for the plan area, whilst also improving recreational and other community facilities. I note that submissions in support of this concept have been lodged from the Main Issues Report consultation period onwards and these have been portrayed as 3 parcels of land - EGD North, EGD South and EGD West. The case put forward for the first of these, EGD North (Millburn Tower) has been considered in its own right elsewhere in this report under Issue 14. Accordingly, below only the cases put forward in respect of EGD South and EGD West have been assessed in detail. The representation acknowledges that the majority of the EGD South and West land is not identified as part of the West Edinburgh Strategic Development Area identified in SESplan. I also note that, like the representations, the council in its own assessments – and its related findings in its Environmental Reports - differentiates between EGD West and EGD South.

Accessibility particularly with regard to Public Transport

94. One of the key arguments made in support of the overall EGD concept, envisaging a co-ordinated package of proposals, is based to a great extent on the accessibility of the area concerned to public transport – notably the proximity of its northern end to the recently established tram link to Edinburgh city centre and to a park and ride facility at Hermiston – and its deliverability in terms of other utility infrastructure networks.

95. Notwithstanding the existence of the new tram service linking the airport with the city centre, I do not find persuasive the arguments put forward to support the contention that the EGD South area is well served in terms of its public transport accessibility – although I acknowledge that it is better in the NW areas nearest to the park and ride facility. I note that there are no binding commitments to deliver the improvements needed to change

that situation significantly. Similarly, I find that most parts of the EGD West area are currently not particularly well served by public transport services - and again there are insufficient planned improvements to increase accessibility over the plan period without major re-routeing of existing bus services. In this regard I note that the M8 motorway and the city by-pass represent barriers that in my opinion will remain significant constraints to future service improvements to serve the EGD South and EGD West areas – notwithstanding the existence of the tram link and the park and ride facilities. Mitigation may be feasible but I consider this is insufficiently detailed at this stage. Circular 6/2013 advises me that any recommendation to include this site would require sufficient environmental information and evidence of public consultation.

Site selection and the landscape setting

96. In support of the overall EGD concept, following a charette process, the representation has made detailed submissions illustrating how the extensive EGD area as a whole could be developed on a phased basis with careful attention paid to providing neighbourhood based masterplans with appropriate linkages and open space. This is all with a view to making this area's development cohesive and attractive, including in terms of its urban design. Under Issue 14 it is accepted, in the case of the EGD North site, that the established woodland belt there could form a boundary to the site but that this would not be preferable to that already established by the bypass. Based on my own site visits across the rest of the EGD area, I am concerned that major new development in the EGD South area would mean that significant adverse impacts on the existing appearance and landscape setting of this relatively unspoilt area would be unavoidable. The representations argue that the extent of that change in the short term would be mitigated by the proposal that no more than 200 houses would be built here by 2019 and much of this area would be for sports uses. Nevertheless, I remain concerned that the EGD South parcel of proposals would still amount to a significant amount of built development, in the short and longer terms, including major stadium proposals and associated parking in addition to the overall amount of new housing envisaged here as part of the overall scheme, even if these were built on a phased basis.

97. This area is not only highly visible in its local context and from the city by-pass but also when viewed from the nearby Pentland Hills area to the south. The adjoining section of the by-pass currently represents a clear division between the main built-up area to the east of it and the generally less developed areas of EGD South and West to the west of it. Here, the landscape is characterised by more open farmland and woodland areas around the long established settlements - such as Juniper Green. The landscape and visual amenity of the rural and semi-rural areas around the old villages has been quite deliberately and consistently safeguarded within the strategic and local plans for the area, including through green belt designation where appropriate. I am not persuaded that the context of the existing developments on the opposite side of the by-pass, at Sighthill and The Gyle, mean that the EGD South developments to the west of the A720 road would not significantly impact on the wider landscape setting – as argued in the representations.

98. With particular regard to the EGD West area, I acknowledge that the Union Canal is a unifying element passing through this area. Nevertheless, I am concerned that the locality's other major transport corridors - notably those occupied by the M8 and the city bypass as well as the operational railway - all represent physical impediments to ensuring cohesion between any major new developments here and the existing local landscape and its established communities, as well as to nearby areas of the city immediately to the east of the city by-pass and to the city centre.

99. Whilst I acknowledge that much of the EGD West area is concealed from view from the M8 motorway by tree-lined cuttings, I find that large swathes of the open land between that motorway and the A71 are readily visible from the M8 with the Pentland Hills in the background. Accordingly, I am concerned that the proposals seeking major built development here would be visually prominent locally and would diminish wider views of the surrounding landscape from this strategic road corridor. The council has attempted to quantify the areas so affected and in my view the counter arguments put forward in the representations are not persuasive and do not justify dismissing the council's assessment and conclusions in that regard, which I regard as soundly based. In summary, whilst I acknowledge that development of the area concerned would not necessarily be a conspicuous feature in views to and from the main part of the city, I conclude that such development would have a significant adverse effect on the local context of the areas of the city located to the west of the city by-pass. My conclusions in this regard take into consideration that the proposals include what is termed a Calyx or National Garden in addition to the major housing developments being planned here – albeit at low densities.

100. A particularly important concern I have is that the rural character of the existing open views along many stretches of this section of the Union Canal corridor west of the by-pass would be unacceptably compromised by the introduction of substantial amount of built form into an area that the representation acknowledges has strong rural characteristics. I note the proposals include structural planting and the introduction of new tree belt screening but I am not persuaded that this would be appropriate in the local landscape context. In any event I question its likely effectiveness to satisfactorily address the above issues regarding visual impact and landscape setting. Whilst the representations have provided detailed study findings aimed at addressing these concerns, I find more compelling the assessment of these matters by the council and I regard its findings as a robust basis for the overall conclusions drawn.

101. On my site visits it was evident that this section of the Union Canal, as well as attracting canal barge users, rowers and paddlers, has a good quality tow path which is extensively used by individuals and family groups for walking, dog-walking, running and cycling. Accordingly, I conclude that as well as irreversibly changing the character of its environs the large-scale form of the EGD development strategy being proposed, however well designed and landscaped, would detract from the recreational attractiveness of the canal corridor. In my view this is an important, highly attractive landscape feature and being such a precious and valued asset it should be safeguarded as far as possible for the continued enjoyment of local people and visitors to the area.

General Conclusions

102. Based on all of the above considerations I conclude that the case made in support of the concept that would effectively amount to a new settlement made up of new neighbourhoods to be located in the EGD South and West areas is not persuasive. Furthermore, I conclude that the proposals for those major new development parcels, however well laid out and landscaped, would not be appropriate and would not accord with the policy principles set out in the Scottish Planning Policy (SPP), the SESplan, including with regard to policies 8 and 12, and the proposed plan's aims and policies – in the context of its Part 1, section 2, paragraph 122 and its part 2 policies including policies Env 10, Env 18 and Tra 1. In this context and given these overriding conclusions that rule out the allocations of the EGD South and West areas for the reasons outlined, I have not considered it necessary or appropriate to explore in detail other matters such as

education provision and flood risk. I do not consider the identified shortfall in the housing land supply is sufficient to overcome these concerns.

Site at Calder Road (in the Edinburgh Garden District South area)

103. This representation concerns a small complex of now vacant, former industrial buildings in a secure compound. This is located immediately to the south of the Union Canal and close to the city by-pass. Indeed, it is only separated from the by-pass by a small grouping of buildings and land at East Hermiston Farm - which I noted on my site visit include some non-farm uses including caravan storage. This representation simply argues that the vacant industrial property is appropriate for re-development for housing – and contends that, as such, it could be included within the Edinburgh Garden District South area.

Green Belt and Landscape Setting

104. The building group in question is in the green belt and its northern boundary is formed by the Union Canal corridor. Whilst adjoining East Hermiston Farm, it is otherwise isolated from other housing development and remote from Hermiston village – but not far from the Hermiston Park and Ride facility. In summary, the site is situated in a generally open area, devoid of built development other than the neighbouring buildings at East Hermiston Farm and it is not readily accessible to most community services and facilities.

105. In this context I am in agreement with the council that whilst the wider, much more extensive proposals for EGD South would impact unacceptably on the landscape setting of the city, this would not necessarily be the case for this much smaller, former industrial building complex site – which has been previously developed commercially. This would, however, depend on any new proposal for the site being carefully conceived, whether as some form of small-scale rural housing initiative or for another land use. I would also anticipate that any such proposal would also need to demonstrate how it was closely related in scale and form to the original East Hermiston Farm buildings close by, as well as ensuring that the landscape setting of the canal corridor immediately to the north is not compromised significantly. All of these as well as other material considerations could be explored in detail through the Development Management process if a planning application was lodged and assessed by the planning authority prior to its determination.

106. Given the very limited scale and the particular location and context of the site in question, I conclude that it would be inappropriate for me to consider further the possible formal allocation of the site in the new plan. Instead I conclude that its possible future uses and re-development options here would be most sensibly explored through the Development Management Process. In any event, I agree with the council that this site should remain in the green belt as its removal from that designation would mean that the surrounding green belt land would have less clear and less defensible boundaries than is the case now. In summary for the above reasons and having had close regard to its very limited scale and particular location, I conclude that this site should be formally allocated in the plan or removed from the green belt.

Riccarton Village

Curriehill Road rail bridge crossing

107. The representation is solely seeking a realignment – widening or straightening – of a section of Curriehill Road by an existing railway bridge in order for this road to cater for increased traffic generation along it.

108. I do not regard such a localised issue as meriting detailed consideration as a possible formal modification to the new plan. In any event, I am persuaded that exploration of the need and scope for realignment of the road network at this location would only be examined as part of a Transport Assessment in the context of any new development proposals for the surrounding area that were regarded as likely to have significant impact on road traffic here. In summary, I conclude that there is no reason to modify the plan in response to this particular representation.

Riccarton South and West

Site selection and accessibility

109. This representation contends that allocation of this group of agricultural fields for housing development is required to help address a perceived shortfall in housing allocations in the period up to 2019 - in order to ensure an effective 5 year housing land supply is maintained across the plan area. It is argued within the Development Framework Report prepared in support of the suggested allocation that the new "village" now being proposed for the site concerned would be appropriate – with reference to a full range of relevant criteria including accessibility, green belt and landscape setting, local infrastructure capacity and its location in relation to existing local communities. Whilst noting the arguments and illustrations put forward in the detailed documentation lodged I am not persuaded by their overall assessment or conclusions for the reasons outlined below, having had particular regard to the location of the site and the policy context.

110. The site in question - which is green belt land located in gently sloping, south-facing, open countryside - is defined on its eastern side by the boundary walls of the former Riccarton Estate. Its southern boundary is marked by an operational rail corridor and Curriehill rail station abuts the site. The northern and western boundaries of the site are marked by simple field boundaries with some trees and a change of level defining the northern boundary. Beyond those northern and western margins of the site there are more fields in agricultural use leading into the wider open countryside. Whilst the eastern and southern edges of the site are strong, I am concerned that the western boundaries in particular are generally poorly defined and not readily defensible against pressure for future incursions of more built development into the open countryside beyond, if the site proposed was allocated and developed.

111. I note a new distributor road is proposed which could route bus services through the site and the proposal is of a scale that could include a primary school and local shops. I recognise potential to link to bus services currently servicing the university and research park, the rail station and Hermiston Park and Ride. The site is located close, at least in parts, to the Curriehill Rail Station which provides a commuter service into Edinburgh. Parking here is currently restricted although I accept this could be improved. There is potential to integrate into the existing walking facilities via existing Core Paths and provide safe routes to the university and research park and to the new National

Performance Centre for Sports. The potential also exists to provide safe routes to both the local primary and secondary schools in Currie. The submissions indicate how education constraints might be addressed and that the site can fund developer contributions to augment infrastructure needs such as education and transport.

112. I note the site is constrained by known flooding risk associated with the Murray Burn and I consider further assessment would be required on the impact this would have on the developable area. The potential of the site in question as a development opportunity is also constrained, firstly, by the presence of a major overhead power transmission lines and pylons that traverse it. The power lines would also have the effect of fragmenting any housing development as 'stand-off' distances would have to be respected. In addition I have concerns about the configuration of the local road network where road capacity and congestion are already of significant local concern.

Green Belt and Landscape setting considerations

113. As stated earlier, the site concerned is green belt land. Whilst there are treebelts to the east and north the lack of boundary definition to the west of the site means that it would be very difficult to put in place new, clearly defined and defensible green belt boundaries that would fully meet the criteria and policy principles set out for green belts, including in the Scottish Planning Policy (SPP) as summarised in paragraphs 49 and 52. The submissions indicate a new tree belt could be formed by substantial tree planting along the boundaries. Whilst I accept such an approach has been accepted elsewhere in the proposed plan I find this proposal is less contained, and relatively less well related to the existing pattern of settlement. Development of this open site would also impact adversely on local views, including from the Glasgow via Shotts rail corridor, even if wider views of the site are contained by the ridgeline to the north, the settlements to the south and the tree belts to the east.

114. One of the objectives of green belt as set out in paragraph 34 of the plan is to direct planned growth to the most appropriate locations and support regeneration. In this context, I am not persuaded that the release of this area of greenbelt in this peripheral location would be justified. It would simply add more residential development to a peripheral local area that is already well provided for in terms of new housing allocations. I consider there are more appropriate and sustainable locations in which to direct any further requirements for housing land. The development plan spatial strategy places some emphasis on the strategic development areas in this respect. Consequently I do not consider the site should be released for housing. The balance of considerations leads me to conclude that it should be retained in the green belt given the important role of the green belt boundary, as shown in the proposed plan, in preventing any further significant urban expansion and erosion of the countryside setting on this more peripheral edge of the city. I note the submissions assess the site favourably against environmental objectives however the site has not been subject to any formal SEA assessment. Circular 6/2013 advises me that any recommendation to include this site would require sufficient environmental information and evidence of public consultation.

115. In summary, for the reasons outlined above, I conclude that the case for releasing this extensive site from the green belt for allocation for housing is not persuasive. I do not consider the identified shortfall in the housing land supply is sufficient to overcome these concerns.

Reporter's recommendations

Modify the proposed plan as follows:

1. Allocate the site at Ravelrig Road for residential development (as defined in planning appeal reference PPA-230-2140) with an indicative capacity of 120 houses and show this site on the Proposals Map and in Table 4 as HSG 38 with the following description (following the format used for other sites listed in Table 4):

Reference: HSG38.
Name: Ravelrig Road, Balerno
Site Area: 14 hectares
Estimated total capacity: 120

Comments:
Planning permission in principle was granted in December 2015 for housing development on the site. Proposals must accord with the Development Principles set out in Section 5 of the plan and the planning conditions attached to the decision notice granting planning permission in principle (reference PPA-230-2140).

2. In Section 5 of the plan insert the following development principles to Ravelrig Road (HSG 38)

In Part 1 Section 5 Edinburgh West:

Ravelrig Road (HSG 38) – Development Principles

- Address the General Principles on education and transport infrastructure as recommended through Issue 21 (as set out in paragraphs 123-125).
- Address any required local road/junction improvements
- Provide green network connections and a landscape framework with the layout and landscaping achieving integration with neighbouring housing sites
- Create pedestrian and cycle connections to adjoining housing areas, particularly to the south and east.
- Substantial woodland edge to be retained with recreational access to form a new green belt boundary along the northern boundary of the site.
- A Bird Hazard Management assessment and associated plan will be required to ensure the proposals address any required mitigation measures emerging
- Secure any required archaeological works.

The council should illustrate these development principles in map form as a part of a revised Balerno and Currie Site Brief.

Issue 17	**Suggested sites outwith the Urban Area - Elsewhere**	
Development plan reference:	**Table 4 pages 25-27** **Proposals Map**	**Reporter:** Richard Bowden Allison Coard

Body or person(s) submitting a representation raising the issue (including reference number):

86 individuals submitted in support of Midmar Paddock (See Issue 17 Appendix A)

53 individuals submitted in support of Winton Gardens (See Issue 17 Appendix B)

Organisations, elected representatives and individuals other than those in Issue 17 Appendix A & B:

0136 Richard Gillanders
0252 Aithrie Estates
0364 Craigleith/Blackhall Community Council
0511 Friends of the Hermitage of Braid
0579 Esk Valley Trust
0672 Scottish Rights of Way & Access Society
0922 Malcolm Macleod
0996 RG Henton
1149 Castle Craig Investments Ltd
1154 CALA Management Ltd
1463 Boland Scottish Properties Ltd
1973 Morningside Community Council
1976 Midmar Allotments Association
2037 Alana McMurtrie
2085 A & D Brewster
2118 Buccleuch Property Group
2244 Blackford Hill Limited
2266 Susan MacFarlane
2297 Friends of Craighouse
2416 Miller Homes Ltd
2425 Jo Ellis
2482 Simon Wilson
2542 Alan Herriot
2544 Tartan Leisure Ltd
2549 Trustees of the Catchelraw Trust
2636 Janet Hilton
2662 Ian Murray MP
2678 Straiton Park Limited
2691 CALA Management Ltd
2696 James R S Brownwight
2703 Ogilvie Homes
2718 Virginia Herriot

Provision of the development plan to which the issue relates:	Sites not allocated for housing the Urban Area and not in South East, West, North West or South West, outwith the Urban Area, which are being promoted by developers and landowners in their representations. Sites not allocated for commercial and business use outwith the Urban Area, which are being promoted by developers and landowners in their representations.

Planning authority's summary of the representation(s):

CONTEXT

Most of these proposed housing sites were the subject of representations to the first Proposed Plan.

Midmar Paddock

- Suggests removing the site from the green belt and allocating it for housing development with associated open space/community uses/greenspace proposals.

States that it has the capacity for 8-10 houses, with the remaining 2ha for new greenspace. It complies with SDP Policy 7 in by being in keeping with the character of the adjacent built development and not undermining the green belt objectives. The site is not identified as Grade 1 agricultural land, is considered to be effective and deliverable, and will help meet the shortfall in housing land supply. Any additional infrastructure required will be committed or funded by the developer. **(2244 Blackford Hill Limited)**

- Supports the designation of Midmar Paddock as green belt, open space, Local Nature Conservation Site and Special Landscape Area. Considers that the site is important in terms of contribution to landscape and setting of the conservation area. It also contributes to the ecology, provides an amenity space and establishes a clear green belt boundary. The field is also identified by the Allotment Strategy Group as a potential site for extension of the allotment site. Support non-designation of site for housing in the Plan. **(0511 Friends of the Hermitage of Braid; 0579 Esk Valley Trust; 1973 Morningside Community Council; 1976 Midmar Allotments Association; 2297 Friends of Craighouse; 2662 Ian Murray MP; 86 individuals listed in Issue 17 Appendix A)**

Winton Gardens

- Suggests that land at Winton Gardens should be allocated for housing with an indicative capacity of 50 dwellings. States that it will help to meet housing requirements. Considers that the location is sustainable and supported by SDP Policy 7 by being in keeping with the character of the settlement and surrounding area, does not undermine green belt objectives and is highly accessible by public transport. Any additional infrastructure required will be committed or funded by the developer. It is considered, also, that the development will not compromise the special characteristics of Morton Mains Conservation Area. **(2416 Miller Homes Ltd)**
- Supports the continued designation of Open Space, Green Belt, Special Landscape Area and Conservation Area status at Winton Gardens. **(2662 Ian Murray MP; 53 individuals listed in Issue 17 Appendix B)**

Craigcrook Road

- Suggests allocating land at Craigcrook Road for housing development and removing the site from the green belt, Special Landscape Area, Local Nature Conservation Site, and open space designation. Considers that this is an effective site with full supporting infrastructure and would contribute to the housing land supply. The development is in accordance with SDP strategy of maintaining a 5 year housing land supply at all times. It is considered to be effective with full supporting infrastructure in a highly accessible location. Removal of the site from the green belt would maintain a long-term defensible green belt boundary. The character and appearance of the area will not be adversely affected as key landscape features will be fully respected. Open space and public access to Corstorphine Hill will form a significant part of this development. The Local Nature Conservation Site in the locality will not be adversely impacted upon. **(1154 CALA Management Ltd)**
- Supports the continued designation of the field at Craigcrook Road as green belt, Special Landscape Area and Local Nature Conservation Area. Objects to any building on the site on the grounds of school capacity, traffic issues, pressure on local services and impact on landscape and views. **(0922 Malcolm Macleod; 1149**

Castle Craig Investments Ltd; 0136 Richard Gillanders; 0364 Craigleith/Blackhall Community Council; 0996 RG Henton; 2037 Alana McMurtrie; 2266 Susan MacFarlane; 2425 Jo Ellis; 2482 Simon Wilson; 2636 Janet Hilton)

Other proposed housing outwith the Urban Area

- Considers that Ravelston Quarry is an effective site, capable of providing housing land on a sustainable brownfield site. States that the condition of the woodland and wildlife habitats on the site is deteriorating and allowing development would ensure that the landscape value of the wider site could be preserved. Introducing a public footpath as part of the proposals would ensure that access to open space is improved, in support of green belt and green network objectives. It is stated that the site is effective, deliverable and capable of contributing to the five year housing land supply and should be recognised as an allocated site in the Plan. **(1463 Boland Scottish Properties Ltd)**
- Supports the continuing designation as Green Belt of land at Ravelston Quarry. **(Alan Herriot 2542; Virginia Herriot 2718)**
- Suggests that the site at Mortonhall Army Camp in Fairmilehead be included in the Plan as a housing proposal with a capacity of 85-120 houses. Development on this site would secure the redevelopment of a brownfield site which is no longer in use other than for grazing. Stated as forming a natural and attractive eastward extension to the existing residential area. **(2549 Trustees of the Catchelraw Trust; 2691 CALA Management Ltd)**
- Suggests that the site at Frogston Road West be removed from the green belt and allocated for housing with a capacity for up to 20 units. Considers that the site is effective, does not fulfil the objectives of the green belt, and will not significantly impact on the character and setting of the Morton Mains Conservation Area. **(2691 CALA Management Ltd)**
- Suggests that two sites at Duddingston Golf Course be removed from the green belt and allocated for housing. States that these are effective sites that could make a positive contribution to meeting the Council's housing requirements without having a detrimental impact on the green belt and amenity of the golf course. Development would effectively be a logical extension of the urban area. **(2703 Ogilvie Homes)**

Proposed commercial/business outwith the Urban Area

- Suggests that the land to the north west of Kirkliston should be allocated for business development and removed from the green belt. States that this site is in a sustainable location as it is well served by public transport and is in an area of population growth. The site also has a gas pipeline constraint in close proximity. The site does not make a positive contribution to the green belt objective and its removal would not materially affect the integrity of the green belt. **(0252 Aithrie Estates)**
- Suggests removing land at the South West corner of Newbridge from the Countryside Area Policy and allocate as industrial/business development. When considered against the criteria for assessing a site's effectiveness, the site represents an effective development site. Furthermore, assessment against green belt policy objectives justifies its release from the countryside. It is stated that the site is highly accessible, deliverable and will contribute to meeting the employment

land requirement of the Plan. **(2085 A&D Brewster)**

- Seek removal of 12 ha of land at Old Dalkeith Road from the green belt in order to allow for an allocation of employment land to meet SDP requirements. Considers that employment land in this location would form an extension to the existing Shawfair Business Park and would help to meet employment requirements in South East Edinburgh. The site is located on the edge of the green belt with new residential and education provision proposed in the near vicinity. The site can be accessed from an existing roundabout, located close to business and industrial uses and close to public transport links. **(2118 Buccleuch Property Group)**
- Suggests that the site previously identified as Craigpark Quarry in the Rural West Edinburgh Local Plan be removed from the Countryside Policy Area and identified as an outdoor leisure and recreation opportunity. States that the site is essentially a brownfield development opportunity. The site offers an opportunity to expand the existing destination created by the climbing centre and to provide improved access to outdoor activities for the local population, and across central Scotland. **(2544 Tartan Leisure Ltd)**
- Suggests that Lang Loan be allocated for employment use, including industrial, storage and distribution uses. The site is highly accessible and currently makes no meaningful contribution to the green belt. It is well screened by mature vegetation from the surrounding landscape, is unsuitable for agricultural use and is currently subject to fly tipping due to the absence of any activity/natural surveillance on the site. The site would make a positive contribution to the city's continuing economic growth and provide an appropriate use for the site. **(2678 Straiton Park Limited)**
- Suggests that part of the Local Nature Conservation Site along Burdiehouse Road be removed and the land identified for development of a filling station with shop. This land has been identified as part of the new greenspace area for Burdiehouse housing proposal (HSG 22). Considers that the site has no landscape, flora, fauna or geological features of interest. **(2696 James RS Brownwright)**

Modifications sought by those submitting representations:

Midmar Paddock

- Suggests removing the site from the green belt and allocating it for housing development with associated open space/community uses/greenspace proposals. States that it has the capacity for 8-10 houses, with the remaining 2ha for new new greenspace. **(2244 Blackford Hill Limited).**
- Supports the designation of Midmar Paddock as green belt, open space, Local Nature Conservation Site and Special Landscape Area. **(0511 Friends of the Hermitage of Braid; 0579 Esk Valley Trust; 1973 Morningside Community Council; 1976 Midmar Allotments Association; 2297 Friends of Craighouse; 2662 Ian Murray MP; 86 individuals listed in Issue 17 Appendix A)**

Winton Gardens

- Suggests that land at Winton Gardens should be allocated for housing with an indicative capacity of 50 dwellings. **(2416 Miller Homes Ltd)**

Craigcrook Road

- Suggests allocating land at Craigcrook Road for housing development in Table 4 of

the Plan and removing the site from the green belt, Special Landscape Area, Local Nature Conservation Site, and open space designation. **(1154 CALA Management Ltd)**
- Supports the continued designation of the field at Craigcrook Road as green belt and Special Landscape Area. **(0922 Malcolm Macleod; 0136 Richard Gillanders; 0364 Craigleith/Blackhall Community Council; 0996 RG Henton; 2037 Alana McMurtrie; 2266 Susan MacFarlane; 2425 Jo Ellis; 2482 Simon Wilson; 2636 Janet Hilton)**

Other proposed housing outwith the Urban Area

- Suggests that the site at Ravelston Quarry should be recognised as capable of delivering housing land (3-5 dwelling houses) within the timeframe of the Plan and be removed from the green belt. **(1463 Boland Scottish Properties Ltd)**
- Suggests that the site at Mortonhall Army Camp in Fairmilehead be included in the Plan as a housing proposal with a capacity of 85-120 houses. **(2549 Trustees of the Catchelraw Trust; 2691 CALA Management Ltd)**
- Suggests that the site at Frogston Road West be removed from the green belt and allocated for housing with a capacity for up to 20 units. **(2691 CALA Management Ltd)**
- Suggests that two sites at Duddingston Golf Course be removed from the green belt and allocated for housing. **(2703 Ogilvie Homes)**

Proposed commercial/business outwith the Urban Area

- Suggests that the land to the north west of Kirkliston should be allocated for business development and removed from the green belt. **(0252 Aithrie Estates)**
- Suggests removing land at the South West corner of Newbridge from the Countryside Area Policy and allocate as industrial/business development. **(2085 A&D Brewster)**
- Seek removal of 12 hectares of land at Old Dalkeith Road from the green belt in order to allow for an allocation of employment land to meet SDP requirements. **(2118 Buccleuch Property Group)**
- Suggests that the site previously identified as Craigpark Quarry in the Rural West Edinburgh Local Plan be removed from the Countryside Policy Area and identified as an outdoor leisure and recreation opportunity. It is also considered that a specific policy which relates to the site should be included within the Plan which reflects the approved planning permission and aspiration of RWELP that the site be developed as a Country Park with water-related leisure/recreational activities. **(2544 Tartan Leisure Ltd)**
- Suggests that Lang Loan be allocated for employment use, including industrial, storage and distribution uses. **(2678 Straiton Park Limited)**
- Suggests that part of the Local Nature Conservation Site along Burdiehouse Road be removed and the land identified for development of a filling station with shop. **(2696 James RS Brownwright)**

Summary of responses (including reasons) by planning authority:

Site selection

- The LDP must conform to the relevant provisions of the approved SDP and its

Supplementary Guidance. These include a requirement for a generous allocation of housing land in the Council's area and the designation of a green belt around Edinburgh (SDP Policies 5, 7 and 12).

In preparing the LDP, the Council has sought to meet the overall housing land requirement in ways which prioritise use of brownfield sites in existing urban areas and which minimise the loss of land from the green belt, in accordance with SDP paragraphs 113 and 130. The Council's response to the representations in Issue 5 explains why it is nevertheless necessary for this LDP to make significant new releases of greenfield land from the green belt at this time, and of the scale set out in the Second Proposed Plan.

In selecting greenfield housing sites for release, the Council has sought to minimise the impact on greenbelt objectives and to secure long-term boundaries, in accordance with SDP Policy 12 and paragraph 130. To do so, the Council has assessed relevant greenfield land for its suitability in these terms. The site assessment process has gathered evidence on the relevant land on a systematic and consistent basis and presented its findings in a way which enables comparison and hence selection of those sites which are most appropriate. This approach has been informed by consideration of the findings and recommendations of the Report of Inquiry for the Edinburgh City Local Plan (pages 1-21 to 1-26).

For the LDP the Council has set out the evidence of its housing site assessment in the project's Environmental Report, which also presents the statutory Strategic Environmental Assessment of the Plan. The method and criteria used in the site selection process are described in Volume 1 of the Environmental Report – Second Revision, pages 26-33. The site assessments are set out in Appendices 5-9 (Volume 2) and, for some sites, the Environmental Report Addendum. At each stage of the LDP project the Environmental Report has been revised and updated as appropriate to:

- show what regard has been had to statutory representations received at the previous stage;
- respond to changes in the SDP context to the LDP, which have required additional housing land to be found.

The criteria used for the housing site assessment are set out in Tables 6 and 7 of the Environmental Report (Volume 1). They are structured using the three objectives for green belts stated in Scottish Planning Policy paragraph 49 and SDP Policy 12. They correspond to SDP policies and the content of Scottish Planning Policy as set out in Table 1, page 3 of the Environmental Report Addendum. The assessment findings set out in the appendices of the Environmental Report include the Council's overall conclusions about whether some or all of a site should be allocated in the LDP.

For ease of comparison, the assessment findings are presented in matrix form in Appendix 2 Updated of the Environmental Report Addendum. This is intended to be a similar format to that used in the Edinburgh City Local Plan Report of Inquiry. The LDP assessment uses a 'traffic light' symbology to indicate whether a site meets a criterion (green), does not meet it (red), or partly meets it / uncertainty (amber).

For sites selected and allocated in the LDP, a separate, statutory assessment of their likely environmental effects is set out in Appendix 3 of Volume 1 of the Environmental Report. In some cases this identifies likely adverse impacts. Section 4 of the Environmental Report sets these out along with proposed mitigation.

This site selection process has resulted in the Second Proposed Plan's spatial strategy, summarised on Figure 1 of the Plan. It meets the housing land requirements in full while designating a green belt which best meets the objectives of Scottish Planning Policy and SDP Policy 12.

The Second Proposed Plan's spatial strategy establishes and maintains strong, clear long-term boundaries to control the outward growth of the city.

The non-allocation of the following sites and their retention in the green belt is therefore appropriate in terms of compliance with Scottish Planning Policy and SDP Policies 1 A&B, 5, 7, 8, 9 and 12.

No modification proposed.

Midmar Paddock

- A representation for a smaller site at Midmar Drive was submitted to the first Proposed Plan. The Environmental Report – Second Revision, Volume 2, June 2014 p30 concluded that the site was considered too small to identify as a housing proposal in the Plan. The potential for housing development on this site would be better addressed through the planning application process.

  This representation refers to a larger area of land at Midmar Drive. The site has been assessed in the Environmental Report Addendum, using criteria, which includes whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation.

  Current public transport accessibility was found to be acceptable for the majority of the site. Development of the site was found to impact adversely on the landscape setting of the city due to the loss of landscape features and views of the city-wide importance. The existing road is a clear green belt boundary allowing key city views. The development would result in a poorly defined boundary. Development of the site would introduce urban residential development into an area of open space on the western fringe of Blackford Hill thereby diluting the clear definition between the single sided urban street and the open landscape which define the boundary of the adjoining Morningside Conservation Area. The development would restrict views and informal access routes across the open space, thereby harming countryside recreation.

  The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt. No modification proposed. **(2244 Blackford Hill Limited)**

Winton Gardens

- The land was assessed under 'Winton Gardens' in the Environmental Report – Second Revision, Volume 2, June 2014 p255-258. The site was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation.

  Current public transport accessibility was found to be acceptable for the majority of the site. Development of the site was found to impact upon the essential character of the Morton Mains Conservation Area and a green wedge of open landscape between Blackford Hill and the Pentlands, recognised as of value to the wider landscape setting of the City.

  The green belt boundary to the north is formed by a robust woodland belt. Whilst garden boundaries of homes to the west of the site lack the qualities of a defensible green belt boundary, the surrounding agricultural fields are open in character and lack strong physical features capable of forming an alternative urban edge treatment. Development of the site would therefore undermine Green Belt objectives to protect and enhance the landscape setting of the city. Development could continue the pattern of the settlement to the west of the site, however, it would impact upon the open setting to the Morton Mains Conservation Area and its seclusion from urban activity to the west. In this regard, the site is not considered a reasonable site. Development of the site could not be effectively integrated with the character of the settlement and local landscape contrary to SDP Policy 7 a. The Council notes the site specific representation and supporting documentation with regard to the geographic extent of potential landscape and visual effects. The Council maintains its view that the existing Conservation Area and proposed Special Landscape Area represent a resource of value across the Council Area with a high susceptibility to landscape change, with its relative seclusion contributing to the rural setting to the designated areas. This was confirmed by 2012 Planning Appeal Decision ref: PPA-230-2078.

  The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt, Special Landscape Area and Conservation Area. No modification proposed. **(2416 Miller Homes Ltd)**

Craigcrook Road

- The land was assessed under 'Craigcrook Road' in the Environmental Report – Second Revision, Volume 2, June 2014 p250-254. The site was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation.

Current public transport accessibility was found to be acceptable for the majority of the site. Development of the site was found to undermine green belt objectives in terms of protecting and enhancing the landscape setting of the city, with the site providing an open foreground to the distinctive and scenically attractive feature of Corstorphine Hill. Development of the site was also found to be contrary to SDP Policy 7a, through its potential adverse effects on the character and amenity value of the site's sloping, wooded pasture, which is subject to statutory protection of a TPO and contributes to the wooded ridgeline of Corstorphine Hill. The Council notes the indicative layout for 30-35 units and in and additional visualisations in section 6.27 in the representee's 'Vision Statement'. The visualisations are based upon summer conditions and do not represent the impact of development in winter, when the site is more exposed in absence of foliage cover. The potential impact of the development on visual amenity therefore remains unclear.

The photomontages also reveal sloping landform within the site and it is unclear whether extensive or minimal alterations to the site levels would be required, given a change in level across the site of almost 60 m. There are also large areas of the site which exceed 15 to 20% slopes gradients, with the northwest and southern edge of the site unfavourable for development, when layout and slope analysis on page 39 and 24 respectively of the 'Vision Document' are compared.

The impact of the proposal on the existing parkland trees subject to a TPO remains unclear given the gradients on site and requirements for site access, development platforms, utility routes and construction working arrangements. Any changes to existing slopes could alter patterns of drainage and soil water. Potential pressure for tree removal from future occupiers to abate perceived nuisance of leaf litter, over-shadowing and fear of structural damage, could also have detrimental impact on tree protection. The southern edge of the site will additionally be overshadowed by woodland beyond the site boundary on the northern edge of Murrayfield and Ravelston golf courses.

The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt, open space, Local Nature Conservation Area and Special Landscape Area. No modification proposed. **(1154 CALA Management Ltd)**

<u>Other proposed housing outwith the Urban Area</u>

- The site at Ravelston Quarry is identified in the Environmental Report – Second Revision (Volume 1 page 30) as too small to assess as a potential housing proposal in the Plan. The site is subject to a number of environmental designations which set criteria and constraints which could only be addressed through the detailed design of a proposal. The potential for housing development on this site would therefore be better addressed through the planning application process. No modification proposed. **(1463 Boland Scottish Properties Ltd)**
- The site has been assessed under 'North of Frogston Road West' in the Environmental Report Addendum. The site was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear

and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation.

Current public transport accessibility was found to be acceptable for the majority of the site. The frequency of services along Frogston Road may be able to be increased and an additional bus stop at the south east corner of the site would improve access to public transport. In terms of landscape impacts, development would adversely affect landscape characteristics by encroaching upon a structural wedge of green belt. The existing green belt boundary is clearly formed by boundary walling and a mature broad tree belt to the west of Mounthooly Loan. The development would be an isolated pocket of development with limited connections to the existing housing to the west.

The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt, Local Nature Conservation Site and Special Landscape Area. No modification proposed. **(2549 Trustees of the Catchelraw Trust; 2691 CALA Management Ltd)**

- This site was assessed under 'Frogston Road West' in the Environmental Report – Second Revision, Volume 2 June 2014 p259-261. The site was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation.

  Current public transport accessibility was found to be acceptable for the majority of the site. Development was found to impact upon the essential character of the Morton Mains Conservation Area and a green wedge of open landscape between Blackford Hill and the Pentlands, recognised as of value to the landscape setting of the city. The existing green belt boundary is clearly marked by a woodland belt along Winton Loan and returns northwards along tree lined estate boundary walls to Frogston Road West. Whilst the site has woodland enclosure to the south, it lacks a defensible green belt boundary to the east. Development would not be effectively integrated with the character of the settlement and local landscape, altering the remaining open setting to the Conservation Area from the north.

  The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt, Spcial Landscape Area and Conservation Area. No modification proposed. **(2691 CALA Management Ltd)**
- Both of these sites were assessed under 'Duddingston West' and 'Duddingston East' in the Environmental Report – Second Revision, Volume 2, June 2014 p262-267. The site was assessed using criteria which included whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation.

Current public transport accessibility was found to be acceptable for the site. The proposals would impact adversely upon the character and views of designated sites of national and local importance, which contribute to the wider landscape setting of the city. Due to their isolation from existing built up areas, the sites have no alternative defensible green belt boundaries. Development of the sites could not be effectively be integrated with the existing settlement. The sites are separated by open landscape from the city to the north and cut off from the nearest residential neighbourhood at Craigmillar to the south by the railway, woodland cover and industrial premises.

The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council's housing site assessment. This site should be retained in the green belt, open space, Local Nature Conservation Site, Historic Garden and Designed Landscape, Special Landscape Area and Conservation Area. No modification proposed. **(2703 Ogilvie Homes)**

Proposed commercial/business outwith the Urban Area

- The requirement for employment land is set by the SDP Policy 2. Its specific requirement for the Plan to support the delivery of established strategic employment land supply amounting to 186 ha. No more employment land needs to be allocated in addition to what has already been allocated in the Plan. Removal of land from the green belt would have a detrimental impact on green belt objectives and is not justified in this location. Its removal would compromise one of the aims of the SDP which is to 'promote the development of urban brownfield land for appropriate uses'. No modification proposed. **(0252 Aithrie Estates)**
- The requirement for employment land is set by the SDP Policy 2. Its specific requirement for the Plan to support the delivery of established strategic employment land supply amounting to 186 ha. No more employment land needs to be allocated in addition to what has already been allocated in the Plan. Removal of land from the countryside policy is not justified in this location. Its removal would compromise one of the aims of the SDP which is to 'promote the development of urban brownfield land for appropriate uses'. No modification proposed. **(2085 A&D Brewster)**
- The requirement for employment land is set by the SDP Policy 2. Its specific requirement for the Plan to support the delivery of established strategic employment land supply amounting to 186 ha. No more employment land needs to be allocated on top of what has already been allocated in the Plan. As part of the housing site assessment, all land in South East Edinburgh with potential for development has been assessed. This site forms part of the assessment area – Drum South. Removal of land from the green belt would have a detrimental impact on green belt objectives and is not justified in this location. No modification proposed. **(2118 Buccleuch Property Group)**
- There is no justification for a change to the Plan. Policy Env 10 provides sufficient support and criteria for the assessment of countryside recreation uses. Any future proposals for leisure and recreation uses at Craigpark Quarry can be assessed using this and other the relevant LDP policies. No modification proposed. **(2544 Tartan Leisure Ltd)**
- The requirement for employment land is set by the SDP Policy 2. Its specific requirement for the Plan to support the delivery of established strategic employment land supply amounting to 186 ha. No more employment land needs to

be allocated in addition to what has already been allocated in the Plan. As part of the housing site assessment, all land in South East Edinburgh with potential for development has been assessed. This site forms part of the assessment area - South of Lang Loan. Removal of land from the green belt would have a detrimental impact on green belt objectives and is not justified in this location. Development here would also compromise the proposed off-road footpath/cyclepath from HSG 22 (Burdiehouse). No modification proposed. **(2678 Straiton Park Limited)**

- It is not reasonable to remove part of the Local Nature Conservation Site along Burdiehouse Road and identify the land for the development of a filling station with shop. This land is identified as new greenspace within the site brief for Burdiehouse on page 61 of the Plan. The new greenspace should improve semi-natural habitat and amenity value of the Local Nature Conservation Site, extend woodland along the southern bank of the Burdiehouse Burn and incorporate off-road path links to the Burdiehouse Burn Valley Park. No modification proposed. **(2696 James RS Brownwright)**

Reporter's conclusions:

General

1. The housing land requirement is set out in the strategic plan for the area - SESplan. Its associated supplementary guidance- Housing Land November 2014 breaks down the requirement for each of the council areas including the City of Edinburgh. There is a statutory requirement for this local plan to demonstrate consistency with SESplan. In this context the proposed plan must identify a corresponding supply of housing land, which should be effective or capable of becoming effective over the plan period.

2. These matters are assessed in more detail in the conclusions section of Issue 5. I recognise the importance of the city's significant brownfield resource in providing future housing and enabling regeneration of the waterfront and other areas. However, I also accept that given the extent of the housing land requirement combined by the often long lead in times and high costs of delivery associated with brownfield sites these would not alone achieve consistency with the strategic plan. The assessment undertaken through Issue 5 demonstrates the requirement for green field sites to contribute to the housing land supply particularly in the first five year period if the SESplan target is to be met.

3. The Strategic Development Plan for Edinburgh and South East Scotland (SESplan) identifies 4 Strategic Development Areas (SDAs) in Edinburgh – to be the biggest areas of change over the 10 year plan period. As such these SDAs are intended to provide the focus for new housing development, investment opportunities and job creation in locations that can demonstrate good accessibility to existing or planned public transport services. In line with the overall strategy, in addition to identifying significant development proposals in the SDAs the new plan also seeks to support change in appropriate locations elsewhere - including through regeneration opportunities, redevelopment of vacant sites and use of empty commercial units, as well as through increasing densities of development.

4. SESplan Policy 9 requires local development plans to provide policy guidance that will ensure sufficient infrastructure is available, or its provision to be committed, before development can proceed. The council's site assessment and the action plan, which has been prepared to accompany the proposed plan, seek to address these matters. However, there is understandable local concern about the sufficiency of these provisions

and how and when they might be delivered.

5. SESplan through paragraph 130 states that local planning authorities should seek to minimise the loss of land from the Green Belt whilst balancing the need to achieve sustainability objectives. Where development in the green belt is required to achieve the strategy, effort should be made to minimise the impact on Green Belt objectives and secure long term boundaries. Scottish Planning Policy in paragraph 50 states that " In developing the spatial strategy, planning authorities should identify the most sustainable locations for longer-term development and, where necessary, review the boundaries of any green belt." Whilst the objective of retaining long term robust boundaries for the green belt applies the proposed plan must respond to the strategic development requirements as established through SESplan.

6. It is in the above context, and taking into consideration the conclusions and recommendations of Issue 5 of this report that I have assessed the merit of the representations referred to below. My focus is on the sufficiency of the plan rather on the assessment of whether any alternative site would be preferable to ones proposed by the council. The conclusions on Issue 5 and the identified shortfall in the land supply point to the need to add to the land supply..

7. The sites being examined under this issue were not selected through the council's assessment process. Instead they have been put forward in representations as additional proposals for consideration for allocation - in some cases not being suggested until later in the plan process through consultation through the first or second proposed plan. However the council has assessed all of these sites through its Environmental Report June 2014 and Addendum May 2015. In responding to the matters raised in representations, supporting the allocation of these sites, where appropriate I have drawn on these assessments along with the council's Habitat Regulation Appraisal, the Second Proposed Action Programme June 2014 and the council's education and transport appraisals. I note that the council has generally assumed that any infrastructure implications arising for these proposals could be addressed through its action programme taking a similar approach to that applied to sites within the plan.

8. In summary, each of the sites with unresolved representations under this particular issue heading are not in an SDA and have not been identified by the council for allocation in the proposed plan. It is in this context that I now examine each of the sites concerned in the order that they have been listed above.

<u>Midmar Paddock</u>

Site selection and accessibility

9. This comprises two adjoining paddocks of green belt land, separated only by a public footpath, within a larger area of open space known as The Hermitage of Braid that also encompasses wooded valleys along the Braid Burn. The site is located immediately to the north of Braid Burn and Blackford Hill and to the west it abuts residential areas within Morningside Conservation Area. The site is within an area identified as protected open space for grazing and this is crossed by a number of linked un-surfaced footpaths, which were well used by recreational walkers during my site visit. Whilst the site is solely accessed on foot, it is reasonably accessible by public transport. It adjoins the junction of Hermitage Drive and Midmar Drive where there is a small public car park for visitors wishing to access the walks through the site linking to others further afield in the

countryside areas immediately to the south and east.

10. In the above context I am concerned, firstly, that the proposed allocation for housing development, no matter how well designed and landscaped, would impact adversely to an unacceptable degree on the role of this land as one of the key points of access leading into the Hermitage of Braid and Blackford Hill Local Nature Reserve (LNR). This includes the historic Hermitage House located within a secluded valley to the south of the site in question. This area, as well as having significant heritage and landscape qualities, appears to be widely used and enjoyed by visitors for its unspoilt rural character on the fringe of the built-up area of this part of the city. This is reflected in the number of representations lodged and the concerns that have been raised by those objecting to the proposed allocation. Based on the considerations summarised above and others outlined below, I share many of those concerns.

Green Belt and landscape considerations

11. The proposal as well as seeking the site's removal from the green belt proposes a housing allocation here for 8-10 houses with the remainder of the land being retained as green space. In support of this position it is contended that this would not be in conflict with development plan policies, would be in keeping with the character of the adjacent residential area, as well as not undermining green belt objectives. I do not find those arguments persuasive and instead consider that they are outweighed by the detailed site-specific and policy based case for maintaining the 'status quo' – as being advocated by the council and by those registering concerns about the proposal. In summary, for the reasons outlined below I find most compelling the evidence that justifies retaining the site in the green belt and protecting it against the likely adverse effects on the local ecology and recreational amenity if the site was reallocated, even in part, for housing development.

12. More specifically I am concerned that the proposal would allow urban expansion, albeit in a limited form, into an area of accessible and well-used recreational open space that is also performing a valuable role in the green belt. As such in my view this land should be safeguarded from built developments. I am also concerned that such an allocation would lead to a less clear and less defensible definition of the remaining greenbelt land and in my opinion it would erode the overall integrity of the Hermitage of Braid area and its heritage and recreational values, which appear to be well respected and appreciated by local users and visitors. Furthermore, given the fact that it is overlooked from higher vantage points, at the local and strategic levels I conclude that the proposed allocation would be wholly inappropriate as the resulting development would have a significant adverse impact on the visual amenity and landscape setting of this part of the city, which merits being protected.

13. Based on the available evidence, the considerations outlined above and my own site visits, I conclude that the site today meets the purposes of and criteria for green belts summarised in paragraphs 49 and 52 of the Scottish Planning Policy (SPP). As development of part of the site for housing would have a significant adverse effect on local and wider views of this and adjoining parts of the green belt I consider that this would be inappropriate and unjustified. I conclude that the proposal would not be consistent with the terms of policy 12 of SESplan or paragraph 34 of the proposed plan - both of which highlight that one of the objectives of green belts is to protect and provide opportunities for access to open space and the countryside. Furthermore, I conclude that the proposal would not satisfactorily address criteria (a) and (b) of policy 7 of SESplan.

Based on all of these considerations, I conclude that the proposed allocation would be wholly inappropriate and instead the site should be retained unaltered for its important contribution to the green belt as well as for its recreational value. The site and its adjoining visitor car park were both being well used by walkers during my site visit, which was consistent with the statements made in representations lodged objecting to the loss of the recreational opportunities here if the site was reallocated.

14. Given the above conclusions, which in combination rule out the principle of this allocation, I have not given close consideration to other matters such as educational provision, and the adequacy of other infrastructure capacities of local community facilities and services to serve any new residential development on the site in question. I do not consider the benefits of adding to the housing land supply would outweigh the adverse impacts identified above.

Winton Gardens (Reporter: Allison Coard)

15. The land was assessed under 'Winton Gardens' in the Environmental Report – Second Revision, Volume 2, June 2014 pages 255-258. I note the council do not question the accessibility of the site. The main issue relates to its location within the green belt, a special landscape area and its location in relation to the Morton Mains Conservation Area.

16. I accept the proposal would involve a relatively modest adjustment to the green belt boundary and that the site is contained from wider views by landform and planting. Consequently, I consider the contribution of the site to wider green belt objectives is less significant than in other areas of the city. The submissions in support of the proposal show how key viewpoints into the site could be retained, the mitigation provided by landform and landscaping and the opportunity to create a new green belt boundary by re-enforcing planting to the south close to the City Bypass.

17. However I consider the established woodland around Morton Mains provides a strong and established urban edge. I share the council's concerns in so far as these open fields provide a foreground and setting to the mature wooded policies associated with Morton Mains Conservation Area. These woodlands also form a strong and established green belt boundary. I consider this area of agricultural land, whilst not widely visible, continues to contribute to the rural character and setting of the conservation area. The site is important in continuing to maintain the rural character of the conservation area. I do not consider that development could be achieved without detriment to this character.

18. I find that the relatively small contribution this site would make to the housing land supply is not sufficient to overcome these concerns. Consequently I do not consider the site should be included in the plan.

Craigcrook Road

Site selection and accessibility

19. This is a broadly rectangular, sloping paddock area, west of Craigcrook Road that features some mature trees. It adjoins residential areas to the north and south of it. The representation, in seeking its release from the green belt and allocation for housing, contends that the site is effective and capable of making a contribution to maintaining a 5

year housing land supply over the plan period. Even if that was the case this alone would not be sufficient reason to justify allocation of the site in the proposed plan – particularly as, in my view, the proposal raises a number of concerns detailed below.

Green Belt and Landscape setting

20. The representation is accompanied by a number of supporting documents aimed at demonstrating its suitability for allocation – and amongst these is a Vision Document. This sets out the basis for a masterplan approach to the site's development, including reference to visual and landscape appraisals and a development concept that illustrates how two large parcels of land within the site might be developed for housing whilst leaving the central core as open space and landscaping. Whilst helpful in discussing the local context and the opportunities presented, I am not persuaded by the overall reasoning and conclusions of the submissions for a number of reasons as detailed below.

21. As well as being in the green belt the site is situated on one of the main slopes of Corstorphine Hill. This hill is one of the major landmark features characterising the distinctive topography of the city. For many years it has been categorised as an Area of Great Landscape Value and it is now proposed for designation as a Special Landscape Area in the new plan. Whilst the council's assessment acknowledges that the green belt boundary in this locality could potentially be redrawn to exclude this site, I am concerned that the proposal, if approved, would introduce residential development onto a large part of the open aspect of the wooded pastures here – even if a central corridor was retained. The site currently represents an attractive area of open space forming the eastern flank of Corstorphine Hill in the vicinity of Craigcrook Castle – a category B listed building.

22. In this context I am concerned that the proposed reallocation of the site - to allow a substantial amount of housing development on large parts of it - would have an adverse impact on the landscape character of the area generally and the policy parkland of this estate, even if the site development was limited and configured in the manner illustrated in the development concept supporting the representation. In addition the site in question currently contributes significantly to the setting of Corstorphine Hill's wooded ridgeline and also Hill Park to the north. Furthermore, I note that there are specimen trees on the site that are subject to Tree Preservation Orders, which represent a further constraint on the development potential of the site.

23. In the above context and for the following reasons I conclude that the proposal would not accord with the policy guidance on green belts set out in the Scottish Planning Policy (SPP). I am satisfied that the site today meets the purposes of and criteria for green belts summarised in paragraphs 49 and 52 of the SPP. I am concerned that development of the site for housing would have a significantly adverse effect on local and wider views of this and adjoining parts of this part of the green belt around Corstorphine Hill which in my opinion should be retained unaltered – and this would also help to safeguard the setting of Craigcrook Castle.

24. I conclude that the proposed allocation fails to accord with the policy guidance on green belts set out in the SPP. It would also not be consistent with the terms of policy 12 of SESplan or paragraph 34 of the proposed plan - both of which highlight that one of the objectives of green belts is to protect and provide opportunities for access to open space and the countryside. Furthermore, I conclude that the proposal would not satisfactorily address criteria (a) and (b) of policy 7 of SESplan - and would not be consistent with policies Env 10, Env 11 and Env 12 of the proposed plan. Based on all of these

considerations, I conclude that the proposed allocation, would be inappropriate and would not justify setting aside those policies - even on an exceptional basis to reflect the development concept's intention of retaining of some central areas of open space, trees and other landscape features between two large parcels of new housing development.

25. Accordingly, I conclude that the site should remain in the green belt and not be allocated for residential development in whole or part as illustrated in the submission. This is irrespective of whether or not it could be potentially delivered with regard to access and road infrastructure and setting aside whether or not residential development here might have satisfactory accessibility to other utility services and local community facilities and services. In summary, given that the principle of housing development on the site in question is ruled out for the above reasons, I have not considered it necessary to explore those other matters in any detail. I do not consider the benefits of adding to the housing land supply would outweigh the adverse impacts identified above.

Ravelston Quarry

26. This site is situated close to the junction of Craigcrook Road and Ravelston Dykes Road. It includes a former quarry that is now disused, overgrown and enclosed by mature woodlands as well as being protected by boundary walls and security fences. The representation seeks allocation of the developable part of this brownfield site for housing development. Its western edge is marked by Ravelston Dykes Road. There are individual houses with private gardens immediately to the north of the site, whilst to the south there is a steeply sloping wooded area with some rudimentary path corridors that appear to be used informally by walkers from neighbouring residential areas.

27. In addition to featuring the former quarry, the site has a number of other development constraints including extensive woodland and major changes of levels across it. Accordingly, based on the available evidence, I am concerned that, irrespective of the possible merits of the proposal in principle, the restricted scale and form of the site in question combine to limit severely the extent of the area with real potential for housing development in any event - to below 10 housing units in the council's view. This is reflected in current proposals for the site lodged as a planning application seeking planning permission for 3 houses on the most readily developable part of this site. In summary, even if deemed appropriate for development – the case for which I have not examined in detail – I conclude that the effective capacity of this particular site would fall below the minimum threshold for allocation in the new plan.

28. In this context I conclude that the council is correct in advising that the potential for any development of this site is more appropriately explored and assessed through the Development Management process – through the lodging and processing of a planning application. That process would allow the detailed case for its development to be fully assessed prior to any planning permission being granted, if deemed appropriate by the planning authority.

Mortonhall Army Camp (Reporter: Allison Coard)

29. The site proposed for inclusion would have an indicative capacity of 85-120. The site has been assessed under 'North of Frogston Road West' in the Environmental Report Addendum.

30. I note the potential to increase the frequency of bus services along Frogston Road

and for an additional bus stop at the south east corner of the site. I accept this would improve access to public transport. However, the site extends beyond the strong green belt boundary formed by the mature woodlands to the west of Mounthooly Loan. The site slopes down from here encroaching into an area which has a distinctly rural character with agricultural land to the north, south and east. The site is detached by woodland from the rest of the urban area to the west and would be a visible extension of built development into an established area of green belt. Due to this woodland barrier and the lack of housing on the opposite south side of Frogston Road West there would be limited scope for visual integration with the urban area. I consider development of the site would also impact on users of the core path that runs through the site and in views towards the city from Blackford Hill.

31. I accept that there is nothing to suggest the site would not prove effective in contributing to the housing land supply and assist in providing a range and choice of housing sites. However, in this case, I consider the relative balance of considerations leads me to the conclusion that the site should be retained within the green belt. I do not consider the benefits of adding to the housing land supply would outweigh the adverse impacts identified above.

Frogston Road West (Reporter: Allison Coard)

32. This is a small site with a capacity for circa 20 units. I agree with the appellant that smaller sites can contribute to the land supply and provide for market choice. I also agree that the site is relatively accessible and could achieve good connections to the urban area.

33. However, I consider these advantages must be balanced against the sensitivity of this site relative to its location in proximity to the grade A listed Morton House, within the Morton Mains Conservation area and as part of the green belt. Whilst the listed house was not obviously visible through the trees on my site visit, I consider that the paddock with its enclosing stone boundary wall and mature deciduous trees provides an attractive rural setting not only for the listed building and the conservation area but also for this edge of Edinburgh. The site provides a clear and attractive transition between the more open fields to the east and the housing to the west.

34. I note the contents of the submitted design and access statement and the commitment to protect and repair the existing stone walls, re-use the historic gateway to the site and retain and enhance the existing mature trees. I accept the site has a strong sense of containment. However, I consider it is this sense of landscape containment, with established boundaries, that contributes to the role the site plays in establishing the character and rural quality of the conservation area as well as a valuable landscape setting on this edge of the city. I do not consider that development could be achieved without detriment to this established character and quality or that these impacts would be outweighed by the benefits of adding to the housing land supply. Consequently, my conclusion is that the site should not be allocated for housing and should be retained within the green belt. I do not consider the benefits of adding to the housing land supply would outweigh the adverse impacts identified above.

Duddingston Golf Course (Reporter: Allison Coard)

35. Two sites are proposed in this locality. Submissions in support of the proposal state the sites are effective and could make a positive contribution to meeting the council's

housing requirements. I have no reason to doubt this. I also note that both sites are in walking distance of an existing bus service. However, I do not consider the sites represent a logical extension of the urban area.

36. One of the sites could be considered in the context of an extension to the west of Bingham Medway. However in my view this housing is already in a peripheral location and the area further to the west is clearly of a rural character. In this respect I agree with the council that the site is detached from the city by open landscape associated with the golf course to the north and from the urban area of Craigmillar by the railway, woodland cover and industrial premises. Whilst the site is relatively small it would nonetheless result in an incursion into the green belt that is clearly defined along this edge of the golf course.

37. The other site further to the west, beyond the golf clubhouse, is in my view even more dislocated from any urban residential area and would encroach on the landscaped fringes of the playing fields associated with Holy Rood High School. I am not convinced that appropriate physical or visual integration with the urban area could be achieved.

38. In conclusion, I consider that green belt boundaries in these locations could not be redrawn without compromising the integrity of the area and its established boundaries. There are no obvious alternate boundaries. The sites are in a rural location associated with recreational use and of importance to the landscape setting of the city and open views through to its key landmarks. I appreciate that the proposed development could enable the future viability of the golf club. However I do not consider this justification or the relatively small contribution these sites would make to the land supply are sufficient to overcome my other concerns. Consequently, I do not recommend that these sites should be allocated for housing.

Proposed non-residential allocations outwith the urban area

Background

39. The overall requirement for employment land allocations in the new plan over the plan period is set at 186 hectares by the SESplan policy 2. In that context the council points out that no more employment land needs to be provided in addition to that already proposed for allocation in the new plan. I note that policy Emp 8 of the proposed plan is concerned with business and industrial areas and policy Emp 9 deals with other employment sites and premises. As stated earlier SESplan paragraph 130 states that local planning authorities should seek to minimise the loss of land from the green belt whilst balancing the need to achieve sustainability objectives. It is against this policy background that I now consider in turn the merits of the cases put forward in respect of the each of the sites in question.

North-West of Kirkliston

Site selection and accessibility

40. In the above context, whilst the representation seeks release of this site from the green belt and its allocation for Class 4 employment uses in the plan, in my view this cannot be justified in terms of contributing to meeting the projected requirement specified in the plan. This conclusion is based on the assumption that the sites already allocated by the council in the proposed plan are confirmed and I have been given insufficient

evidence to doubt that this would be the case. I am also not persuaded by the argument that the site's reallocation could be justified on the basis of the policy for promoting strategic development opportunities along the A8 corridor adjacent to the airport – not least because this site is geographically remote and disconnected from that corridor by the adjacent rail line and the airport itself.

41. The land in question is a relatively narrow wedge of agricultural land situated between a spur of the M9 motorway – Forth Road Bridge link (immediately to the north) and an operational rail corridor that forms its southern edge. The only road access is from the B800 Kirkliston to Queensferry road that marks the eastern boundary of the site. The motorway and rail corridors that flank it are set at a higher level, so the site is overlooked from traffic passing along those strategic route corridors, as well as from the B800 road traffic. The site, which is isolated from any communities, comprises agricultural land. Most importantly in my view, it forms part of the rural area separating Kirkliston to the south from Queensferry to the north. Based on all of these considerations and my own site visit I regard this site as contributing positively to the landscape setting and in visual terms counterbalancing to an extent the built forms of the transport corridors that pass through this otherwise undeveloped area.

42. I am also concerned that the allocation being sought would have the undesirable effect of unnecessarily promoting green field, indeed green belt land for employment use instead of prioritising urban brownfield land for such purposes. I conclude that this would be contrary to one of the aims of the strategic development plan and the green belt policies of the development plan and in the Scottish Planning Policy. I am satisfied that the site today meets the purposes of and criteria for green belts summarised in paragraphs 49 and 52 of the SPP, SESplan policy 12 and paragraph 34 of the proposed plan. I am also concerned that allocation of the site for commercial development would have a significantly adverse effect on local views of this and adjoining parts of the green belt and so conclude that it would fail to accord with the policy guidance on green belts set out in the SPP. Based on the same considerations I am also concerned that the proposal would not satisfactorily meet the terms of policy Env10 of the proposed plan which seeks to strictly control developments in the green belt. In this context I conclude that there is insufficient justification to release this site from the green belt and its present agricultural uses in order to provide new employment land.

<u>South West Newbridge</u>

Site selection and accessibility

43. Given the policy context summarised above in paragraph 32, whilst the representation seeks release of this site from the green belt and its allocation for industrial/business uses in the plan, in my view this cannot be justified in terms of contributing to meeting the projected requirement specified in the plan. This assumes that all the sites already proposed for allocation by the council, as listed in the proposed plan, are confirmed and I have insufficient reason to question that assumption.

44. The site concerned is flat, open grassland located on the south–western fringe of Newbridge. It is situated alongside the M8 motorway but not immediately adjacent to an access junction. Its western boundary is formed by the B7030 road and its eastern edge is formed by a dense mature tree belt. Whilst on the opposite side of the hedge-lined local access road that marks its northern boundary there are business premises on an industrial estate, the site in question is designated as being part of the wider green belt.

45. In the above context I regard one of the important values and functions of this site is to act as a green buffer between the M8 motorway corridor to the south and the industrial areas to the north. I noted on my site visit that the site concerned is overlooked by the east-bound traffic moving along the motorway which is set at a higher level. I am concerned that its positive effect on the landscape setting here would be lost if the site was removed from the green belt and allocated for industrial and business uses – even though in simplistic terms that would be consistent with the existing land uses immediately to the north.

46. I am also concerned that the allocation being sought, if approved, would have the undesirable effect of unnecessarily promoting green belt land for employment use instead of prioritising urban brownfield land for such purposes. I conclude that this would be contrary to one of the aims of the strategic development plan - and the green belt policies of the development plan and the Scottish Planning Policy. I am satisfied that the site today meets the purposes of and criteria for green belts summarised in paragraphs 49 and 52 of the SPP. For the reasons outlined above I conclude that commercial development here would have a significantly adverse effect on local views of this part of the green belt and would fail to accord with the policy guidance on green belts set out in the SPP – as well as not satisfactorily meeting the terms of policy Env 10 of the new plan which seeks to strictly control developments in the green belt. Based on all of these considerations I conclude that there is insufficient justification to release this site from the green belt and its present agricultural uses in order to provide new employment land.

Old Dalkeith Road

47. Given the policy context summarised above in paragraph 38, whilst the representation seeks release of this site from the green belt and its allocation for industrial/business uses in the plan, in my view this cannot be justified in terms of contributing to meeting the planned requirement specified in the plan. This assumes that all the sites already proposed for allocation by the council are confirmed and I have insufficient reason or basis to doubt that.

48. The site in question is an elongated wedge of agricultural land bordering Old Dalkeith Road. Its northern part is crossed by overhead electricity transmission lines and pylons. The site is situated to the south of a small grouping of commercial premises and its long western boundary is marked by a line of trees and bushes. The representation argues that this site should be removed from the green belt and reallocated to form an extension to the Shawfair Business Park that is located to the north-east of it, on the opposite side of Old Dalkeith Road. I consider however that the existing green belt boundary along Old Dalkeith Road is strong, clear and defensible in this locality. I am also concerned that removal of this wedge of land from the green belt would make a replacement boundary less defensible and so more vulnerable to further pressure for encroachment by built developments onto adjoining land that would be harder to resist.

49. I am also concerned that the allocation being sought would have the undesirable effect of unnecessarily promoting green field, indeed green belt land for employment use instead of prioritising urban brownfield land for such purposes. I conclude that this would be contrary to one of the aims of the strategic development plan and the green belt policies of the development plan and in the Scottish Planning Policy. I am satisfied that the site today meets the purposes of and criteria for green belts summarised in paragraphs 49 and 52 of the SPP. I conclude that the proposed allocation would not be consistent with the terms of policy 12 of SESplan or paragraph 34 of the proposed plan -

both of which highlight the objectives and purposes of green belts. I also conclude that the proposal would not satisfactorily address criteria (a) and (b) of policy 7 of SESplan and would not meet the terms of policy Env 10 of the new plan which seeks to strictly control developments in the green belt. Based on all of these considerations I conclude that there is insufficient justification to release this site from the green belt and its present agricultural uses in order to provide new employment land.

Craigpark Quarry

50. The representation contends that this former quarry site should be allocated for outdoor leisure and recreation purposes to expand or complement the activities of the adjoining Edinburgh International Climbing Arena (EICA). I note that the site in question is designated as a Country Park approved as part of a planning permission (05/01229/FUL) related to a larger site area, part of which, immediately to the east, was approved for housing development. That permission has since been carried forward, most recently through a material variation (reference 13/02527/FUL), approved in 2013. I note that this latest permission, which relates to the housing component of the original 2005 permission, is now under construction. Most importantly, in respect of the current representation, my understanding is that the position related to the Country Park component was carried forward from the package of developments approved in the 2005 permission and remains unaffected by that housing development proceeding on the adjoining land parcel.

51. Whilst I acknowledge that the country park component of the existing planning permission has yet to be fully implemented, at my site visit I saw that some ground preparation work was in process indicating that the site concerned was actively being worked on. I also note that the site in question is designated as being in a countryside policy area on the proposed plan's Proposals Map. Under policy Env 10 of the proposed plan developments in the green belt and countryside can be permitted for certain purposes if specified criteria are met - and I note that criterion a) of the policy makes specific reference to countryside recreation or where a countryside setting is essential.

52. In the above circumstances I conclude that there is no need for the plan to be modified. Instead in my view these matters would be more appropriately progressed through the Development Management process, whereby a detailed scheme would be lodged through a planning application and its merits assessed by the planning authority.

Lang Loan (South)

53. Given the policy context summarised above in paragraph 32, whilst the representation seeks release of this site from the green belt and its allocation for employment uses in the plan, in my view this cannot be justified in terms of contributing to meeting the planned requirement specified in the plan, assuming that all the sites already proposed for allocation by the council are confirmed and I have insufficient reason or basis to doubt that.

54. The site in question is a relatively small, elevated area of scrubland and bushes situated between the minor Lang Loan road to the north and the city bypass A720 road immediately to the south of it. Most importantly in my opinion this wedge of land, which is part of the green belt, forms an integral part of the buffer between the city by-pass and the built developments of the urban area to the north. I noted on my site visit that the site concerned is overlooked by traffic moving along the city-pass particularly as the site

forms an elevated knoll making it highly visible in its local context. Notwithstanding the fact that this hillock is rather featureless, I remain concerned that its positive effect on the landscape setting here would be lost if the site was removed from the green belt and allocated for employment uses.

55. I am also concerned that the allocation being sought would have the undesirable effect of unnecessarily promoting green belt land for employment use instead of prioritising urban brownfield land for such purposes. I conclude that this would be contrary to one of the aims of the strategic development plan and the green belt policies of the development plan and in the Scottish Planning Policy. I am satisfied that the site today meets the purposes of and criteria for green belts summarised in paragraphs 49 and 52 of the SPP. I conclude that the proposed allocation would not be consistent with the terms of policy 12 of SESplan or paragraph 34 of the proposed plan - both of which highlight the objectives and purposes of green belts. I also conclude that the proposal would not satisfactorily address criteria (a) and (b) of policy 7 of SESplan and would not meet the terms of policy Env 10 of the new plan which seeks to strictly control developments in the green belt.

56. In this context I conclude that there is insufficient justification to release this site from the green belt in order to provide new employment land. In my opinion the above concerns clearly outweigh the fact that the site is accessible, being close to a junction onto the city by-pass and is not of a scale or quality suitable for agricultural use. I conclude that those considerations do not diminish its value as part of the green belt and in particular its important role as part of a green buffer, as outlined above.

Burdiehouse Road

57. The proposal seeks reallocation of this part of a Local Nature Conservation Site fronting onto Burdiehouse Road to provide a new petrol filling station and shop. This is argued on the basis that the land in question has little or no ecological or landscape features of value that would merit its retention, at least in the view of those making the representation.

58. I note that the site in question is allocated in the proposed plan as a new green space as part of a more extensive Local Nature Conservation Site that adjoins existing and new housing developments on either side of the Burdiehouse Burn. In my opinion, the Broomhills and Burdiehouse Brief - associated with allocations HSG 21 to the north west and HSG 22, immediately to the south – makes clear how the site in question is a key element of the overall strategy for this area's future development and amenity. In this context I regard it as very important to safeguard this strategically important wedge of green space, fringed by new woodland in the manner shown in that brief. As the brief states, the local open space, amongst other things, will afford amenity including through the provision of linked walks as well as planned improvements to the semi-natural habitat - including by the provision of new woodland alongside the Burdiehouse Burn. I regard these as important features of the Local Nature Reserve and I am concerned that their value would be damaged irrevocably if the site concerned was reallocated in the development plan to provide a site for a filling station and shop. Accordingly, I conclude that there is insufficient justification for the proposed reallocation of the site in question.

Reporter's recommendations:

No modifications to the proposed plan.

Issue 17 Appendix A – Midmar Paddock	
0185 Roger Pountain	1969 Sally Ann Urry
0350 Paula Kim Crosbie	1970 Robin Urry
0357 Alastair Scott	1984 Sarah Muirhead
0447 Jill Gregory	1998 Bruce Finday Mair
0505 Elizabeth Munro	2010 Mark Kassyk
0506 Andrew Munro	2046 John Martin
0519 Margaret Heatley	2148 Charles Passmore
0521 George Heatley	2149 Anne Passmore
0568 Phoebe Aitchison	2158 Janet Alison
0580 C.D Kerr	2166 Linda Bendle
0581 Britta Sugden	2169 Graeme King
0601 Jennifer Munro	2170 Barbara Arnold
0626 C McConnachie	2178 Melanie Main
0657 Louise Miller	2257 Susan Rankin
0660 Hector Chawla	2316 Martyn Wells
0662 Simon Chawla	2342 Catherine Francis
0732 J R Gardiner	2395 Philip Redfern
0784 Duncan Wallace	2419 Rosy Barnes
0788 Martin O'Gorman	2426 Pol Yates
0794 Fiona O'Gorman	2428 Anne
1027 Gordon Henderson	2445 Anna Raper
1037 Dinah Stevenson	2454 Mary Ball
1074 Cecilia Thomson	2467 Elizabeth Hall
1089 Heather Hewitt	2532 Joe Frankel
1103 Alan Craythorne	2533 Barbara Breaks
1324 Christine Rigouleau	2534 Pam Barnes
1344 Helen Mitchell	2552 Michael Breaks
1493 Gordon Ford	2558 Juliet Wilson
1494 Kathy Tunnah	2561 Graham Johnston
1502 John R Baldwin	2564 Ruth Wilkojc
1560 Sheila Millar	2566 Peter Nienow
1574 Alison Dalrymple	2580 Fiona Hartree
1642 Ann Duncan	2584 Sally Mair
1652 Margaret Holligan	2585 Valeska Andrews
1691 Mohini Padayachee	2621 Maureen Loebel
1735 Nicola Jean Crosbie	2629 Margaret Clark
1736 Alison Waugh	2631 Marek Wilkojc
1742 Lindy Furby	2632 Rupert Forbes
1778 Valerie Forbes	2637 Geoff Ball
1959 Peter Winfield	2649 Carina Dahlstrom
1964 Grange Association	2661 Anni McLeod
1966 Andrew Watt	2672 Ian Meiklejohn
1967 Rhona McGrath	2722 Johan Doake

Issue 17 Appendix B – Winton Gardens

0795	Amanda Griffin
0829	Richard Playfair
1734	James Houston
1744	Gordon Kinnear
1965	James Robertson
1972	Anne Brownie
1977	Allan Brownie
1982	Rosemary Playfair
1997	Alison Gault
2021	Patricia Irving
2032	Dawn Blaik
2145	Lisa Kinnear
2147	Andrew Renton
2152	David Alan Pickup
2167	Graeme Watherstone
2176	Tony Quade
2184	Morag Murison
2185	Craig Murison
2203	Alan Heron
2204	Alex Justice
2211	Harold Feather
2212	Sandra Feather
2223	John Henderson
2243	Janice Hutchinson
2245	Alistair Bowman
2259	Graham Mair
2302	Graeme Danskin
2314	Moira Scott
2326	Sarah J Kinnear
2369	H A Campbell
2370	M Campbell
2375	Jeremy Whitley
2376	Robina Doyle
2377	Christopher Kenmore
2394	Richard Sparks
2399	Richard Bath
2400	John Crawford
2418	Tessa Whitley
2429	John Griffin
2431	William Blair
2444	Audrey C S Ryan
2449	David Elder
2496	George L Gault
2524	Phil Hobbins
2525	Lynn Hobbins
2526	Ronny Strachan
2550	Gerald Granger
2590	Doreen Patterson
2604	William Robb
2607	Iain Smith
2611	Elaine Aitken
2623	Phillip Newlands
2655	Christopher Sayer

Issue 18	**Suggested Housing Sites in Urban Area**	
Development plan reference:	**Part 1 Section 3** **Table 4 pages 25 – 27**	**Reporter:** Richard Bowden Allison Coard

Body or person(s) submitting a representation raising the issue (including reference number):

96 individuals submitted in support of East Suffolk Road (See Issue 18 Appendix A)

Organisations, elected representatives and individuals other than those in Issue 18 Appendix A:

0153 Craigmillar Park Association
0246 Hopetoun Estate Trust/Aithrie Estates
0552 Tony Jones
0553 Pat Jones
0744 G Dunbar and Sons Builders Ltd
1915 Philip Hepburn
2126 Cockburn Association
2246 Mactaggart & Mickel Homes
2354 Grange/Prestonfield Community Council
2416 Miller Homes Ltd
2518 East Suffolk Park Proprietors Association
2662 Ian Murray MP
2686 Legal and General Property
2692 Gladedale Estates Ltd

Provision of the development plan to which the issue relates:	This issue covers suggested housing allocations submitted by developers and individuals to sites within the Urban Area.

Planning authority's summary of the representation(s):

CONTEXT

The Main Issues Report question 4 consulted on how the LDP should deal with housing in the built up areas. Within the main urban areas, the Plan sets a generally positive policy context for new residential development, apart from locations specifically designated on the Proposals Map for particular uses or as open space. Representations have been received at each stage of the Plan process seeking changes on this regard or defending existing designations from change.

<u>East Suffolk Road</u>

- Suggests the allocation of land at East Suffolk Road for housing. Considers that this is an effective site that can contribute to housing requirements. It is stated that the removal of the site as open space would not have a detrimental impact on the character of the local environment and that the proposed development is in accordance with the objectives outlined in Policy Env 18 of the Plan, by facilitating formal public open spac. **(2416 Miller Homes Ltd)**
- Support the continued designation of St Margaret's School playing field in East Suffolk Road as open space. Support the statements in paragraph 48, 50 and 51 about the Green Network and Policy Env 18. **(0153 Craigmillar Park Association; 2354 Grange/Prestonfield Community Council; 2518 East Suffolk Park Proprietors Association; 2662 Ian Murray MP; 96 individuals listed in Issue 18 Appendix A)**

Other open space sites

- Considers that Allison Park in Kirkliston should be allocated in part for residential development as part of enabling development to allow further redevelopment and regeneration of the balance of the park. Considers that there is now an over provision of open space within Kirkliston at this time given recent developments. States that the loss of a portion of the park for development would not adversely affect the wider provision within the settlement. **(0246 Hopetoun Estate Trust/Aithrie Estates)**
- Suggests that the existing areas around the Gilberstoun district are to be re-designated for housing as they are considered to be in poor condition. **(1915 Philip Hepburn)**
- Recommends that the opportunity is taken to review the protected open space and redevelop the site at Telferton in Portobello for housing. Considers that the site is an effective, viable and appropriate 'infill' housing site and could be developed to provide around 30 houses and make provision for new affordable housing in line with current policy. **(2692 Gladedale Estates Ltd)**
- Object to policy Hou 1 and recommend that the site at Hillpark Avenue/Craigcrook Road be allocated as a housing site in Table 4. Considers that the site is effective and capable of delivering housing land within the LDP 5 year timeframe in a sustainable, urban location. The site can satisfy the requirements set out in Planning Advice Note 2/2010. Although there will be a loss of open space, it is not currently publically accessible. **(2246 Mactaggart & Mickel Homes)**

Brownfield sites

- Suggests that the brownfield site located at 371 Lanark Road West be allocated for housing within the Plan. It is stated that the site offers an indicative capacity for around 80 new homes depending on mix of elderly to private family homes. These can be delivered as required to co-ordinate with community infrastructure and to contribute to providing a 5 year housing land supply. The site is supported by SESplan Policy 7 Housing Land Development Outwith Strategic Development Areas. **(0744 G Dunbar and Sons Builders Ltd)**
- Suggests that the regeneration of the multi-storey flat site at the junction of Calder Road and Broomhouse Road should be included as a new housing proposal. Considers that the allocation of this site would reduce the allocation of land elsewhere. **(2126 Cockburn Association)**
- Support the allocation of Bonnington Industrial Estate in the Bonnington Development Brief and request that this is referred to in the Plan and considered as having the potential to contribute to windfall residential development. **(2686 Legal and General Property)**

North West Edinburgh

- Requests that the site at East Kirkliston and the sites at Ferrymuir and Old Corus Motel be included as housing proposals in the Plan. Considers that by including these sites in the Plan, it ensures that the impact of all the housing proposals in the rural west area can be fully assessed together. **(0552 Tony Jones; 0553 Pat Jones)**

Modifications sought by those submitting representations:

East Suffolk Road

- Requests that the existing open space and playing field designation at East Suffolk Road should be removed and the site allocated for housing in the Plan. States that the site should be included in Table 4 in Part 1 Section 3 of the Plan with an indicative capacity of 10. **(2416 Miller Homes Ltd)**

Other open space sites

- Suggests that the site at Allison Park in Kirkliston be allocated for residential development (40 units) to enable the regeneration of the football pitches and sports pavilion. **(0246 Hopetoun Estate Trust/Aithrie Estates)**
- Suggests that the existing areas around the Gilberstoun district are to be re-designated for housing as they are considered to be in poor condition. **(1915 Philip Hepburn)**
- Suggests the inclusion of a 1.4ha site at Telferton, Portobello as a housing proposal within Table 4 in Part 1 Section 3 of the Plan. **(2692 Gladedale Estates Ltd)**
- Recommend that the site at Hillpark Avenue/Craigcrook Road be allocated as a housing site in Table 4 with a capacity of either 2 dwellings or 6 flats. **(2246 Mactaggart & Mickel Homes)**

Brownfield sites

- Suggests that the brownfield site located at 371 Lanark Road West be allocated for housing in Table 4 of the Plan. **(0744 G Dunbar and Sons Builders Ltd)**
- Suggests that the regeneration of the multi-storey flat site at the junction of Calder Road and Broomhouse Road should be included as a new housing proposal. Considers that the allocation of this site would reduce the allocation of land elsewhere. **(2126 Cockburn Association)**
- Requests that the Plan acknowledges the potential of Bonnington Industrial Estate for residential and/or mixed use development. **(2686 Legal and General Property)**

North West Edinburgh

- Requests that the site at East Kirkliston and the sites at Ferrymuir and Old Corus Motel be included as housing proposals in the Plan. Considers that by including these sites in the Plan, it ensures that the impact of all the housing proposals in the rural west area can be fully assessed together. **(0552 Tony Jones; 0553 Pat Jones)**

Summary of responses (including reasons) by planning authority:

East Suffolk Road

- This representation relates to existing open space at East Suffolk Park. There is no justification to remove the open space designation from this site. A planning application (14/03632/FUL) is currently pending consideration for 4 dwellings on

the site and will be assessed against the criteria of Policy Env 18 and 19. No modification proposed. **(2416 Miller Homes Ltd)**

Other open space sites

- This representation relates to the existing open space at Allison Park. There is no justification to remove the open space designation from this site. Any future planning application for housing on this site would be assessed against the relevant LDP policies using the Open Space Strategy. If supported, a financial contribution could be negotiated and secured through a legal agreement to offset any loss of open space. No modification proposed. **(0246 Hopetoun Estate Trust/Aithrie Estates)**
- These areas of open space were provided as part of this residential development when it was granted planning permission at appeal. They are intended to serve the residents' local greenspace needs, and some woodland contributes to the context for Brunstane House. They are unsuitable for housing allocation in the Plan. No modification proposed. **(1915 Philip Hepburn)**
- This representation relates to the existing open space at Telferton, Portobello. There is no justification to remove the open space designation from this site. Any future planning application for housing on this site would be assessed against the relevant policies in the Plan using the Open Space Strategy. If supported, a financial contribution could be negotiated and secured through a legal agreement to offset any loss of open space. No modification proposed. **(2692 Gladedale Estates Ltd)**
- This representation relates to the existing open space at Hillpark Avenue/Craigcrook Road. There is no justification to remove the open space designation from this site. Any future planning application for housing on this site would be assessed against the relevant LDP policies using the Open Space Strategy. If supported, a financial contribution could be negotiated and secured through a legal agreement to offset any loss of open space. No modification proposed. **(2246 Mactaggart & Mickel Homes)**

Brownfield sites

- The Council does not see merit in including the site at 371 Lanark Road as a housing proposal. Policy Hou 1 in Part 2 Section 5 of the Plan supports housing on suitable sites in the urban area provided proposals are compatible with other policies in the Plan. No modification proposed. **(0744 G Dunbar and Sons Builders Ltd)**
- The Council does not see merit in including the flat site at the junction of Calder Road and Broomhouse Road as a housing proposal. A masterplan exists for its redevelopment and planning permission in principle was granted in 2013. No modification proposed. **(2126 Cockburn Association)**
- Bonnington Industrial Estate is included as a site in the LDP Housing Land Study. This document supports the Plan by providing justification for new assumptions on anticipated completions from existing and 'windfall' sites as required by the approved Strategic Development Plan. No modification proposed. **(2686 Legal and General Property)**

North West Edinburgh

- It is not necessary or appropriate to allocate the sites at East Kirkliston, Ferrymuir and Old Corus Motel in the Plan as housing proposals. It is unclear what is being referred to as East Kirkliston in the representation. Land east of Kirkliston is designated green belt in the LDP, but has been suggested by developers as a housing allocation. The Council does not consider this site suitable for reasons given in Issue 15.

  The site at Ferrymuir is in the 2011 Housing Land Audit. Relevant committed residential development in the vicinity of the LDP proposed sites, like Ferrymuir, have been incorporated into the Transport Appraisal Addendum. Old Corus Motel was previously allocated for housing (HSG 5: Stewart Terrace, Queensferry) in the Rural West Edinburgh Local Plan. The LDP does not allocate this site for housing because it is in the urban area where Policy Hou 1 of the Plan supports housing on suitable sites. This site has been classified as 'constrained' in the Housing Land Audit. Therefore, it has not been included in the baseline for the LDP Transport Appraisal. Since then a planning application has been submitted (14/01509/PPP) which the Council is now minded to grant. The impact of the site and any future applications for housing will be assessed as part of the planning application process. No modification proposed. **(0552 Tony Jones; 0553 Pat Jones)**

Reporter's conclusions:

General

1. The housing land requirement is set out in the strategic plan for the area - SESplan. Its associated supplementary guidance- Housing Land November 2014 breaks down the requirement for each of the council areas including the City of Edinburgh. There is a statutory requirement for this local plan to demonstrate consistency with SESplan. In this context the proposed plan must identify a corresponding supply of housing land, which should be effective or capable of becoming effective over the plan period.

2. These matters are assessed in more detail in the conclusions section of Issue 5. I recognise the importance of the city's significant brownfield resource in providing future housing and enabling regeneration of the waterfront and other areas. However, I also accept that given the extent of the housing land requirement combined by the often long lead in times and high costs of delivery associated with brownfield sites these would not alone achieve consistency with the strategic plan. The assessment undertaken through Issue 5 demonstrates the requirement for green field sites to contribute to the housing land supply particularly in the first five year period if the overall requirement is to be met.

3. The Strategic Development Plan for Edinburgh and South East Scotland (SESplan) identifies 4 Strategic Development Areas (SDAs) in Edinburgh – to be the biggest areas of change over the 10 year plan period. As such these SDAs are intended to provide the focus for new housing development, investment opportunities and job creation in locations that can demonstrate good accessibility to existing or planned public transport services. In line with the overall strategy, in addition to identifying significant development proposals in the SDAs the new plan also seeks to support change in appropriate locations elsewhere - including through regeneration opportunities, redevelopment of vacant sites and use of empty commercial units, as well as through increasing densities of development.

4. SESplan policy 9 requires local development plans to provide policy guidance that will ensure sufficient infrastructure is available, or its provision to be committed, before development can proceed. The council's site assessment and the action programme, which has been prepared to accompany the proposed plan, seek to address these matters. However, there is understandable local concern about the sufficiency of these provisions and how and when they might be delivered.

5. SESplan in paragraph 130 states that local planning authorities should seek to minimise the loss of land from the Green Belt whilst balancing the need to achieve sustainability objectives. Where development in the green belt is required to achieve the strategy, effort should be made to minimise the impact on Green Belt objectives and secure long term boundaries. Scottish Planning Policy in paragraph 50 states that " In developing the spatial strategy, planning authorities should identify the most sustainable locations for longer-term development and, where necessary, review the boundaries of any green belt." Whilst the objective of retaining long term robust boundaries for the green belt applies the proposed plan must respond to the strategic development requirements as established through SESplan.

6. It is in the above context, and taking into consideration the conclusions and recommendations of Issue 5 of this report that I have assessed the merit of the representations referred to below. My focus is on the sufficiency of the plan rather on the assessment of whether any alternative site would be preferable to ones proposed by the council. The conclusions on Issue 5 and the identified shortfall in the land supply point to the need to add to the land supply.

7. The sites being examined under this issue were not selected through the council's assessment process. Instead they have been put forward in representations as additional proposals for consideration for allocation - in some cases not being suggested until later in the plan process through consultation through the first or second proposed plan. However the council has assessed all of these sites through its Environmental Report June 2014 and Addendum May 2015. In responding to the matters raised in representations, supporting the allocation of these sites, where appropriate I have drawn on these assessments along with the council's Habitat Regulation Appraisal, the Second Proposed Action Programme June 2014 and the council's education and transport appraisals. I note that the council has generally assumed that any infrastructure implications arising for these proposals could be addressed through its action programme taking a similar approach to that applied to sites within the plan.

8. In summary, each of the sites with unresolved representations under this particular issue heading have not been identified by the council for allocation in the proposed plan. It is in this context that I now examine each of the sites concerned in the order that they have been listed above.

East Suffolk Road

9. This is a former school playing field site that is no longer in use. This rectangular area of overgrown grassland extends to 1.3 hectares and has in one corner a disused sports pavilion building, which is a listed structure. The site, which is within a conservation area, is defined by neighbouring residential areas to the east, west and south and by a rail line corridor immediately to the north. The northern, eastern and southern boundaries of the site feature mature trees and bushes, which provide a strong sense of enclosure, whilst the site is more open when viewed from East Suffolk Road that

marks its western edge. The only access to the site is via a gate located at the junction of East Suffolk Road and Crawfurd Road. I note that those opposing allocation of this site for housing instead support its continued designation as open space in the proposed plan.

10. The site in question has been the subject of a formal planning application (14/03632/FUL) – lodged in September 2014 – that proposed 10 new houses accessed from Crawfurd Road, along with the formation of a public park to incorporate a relocation of the pavilion elsewhere on the site. That application was eventually refused by the council in December 2015, contrary to the recommendations set out in the officer's report to committee. I note the volume and range of concerns expressed in the objections lodged both in respect of the proposed plan and in response to the above planning application. These raise essentially the same issues, relating principally to: loss of open space here and for the locality; the lack of housing need in this particular area; a preference for restoration of the sports pavilion in situ; the perceived adverse effects on the local conservation area and on views towards Arthur's Seat; loss of protected trees; impacts on biodiversity; and exacerbation of existing traffic-related concerns on local roads.

11. I note that the council officer's report to committee dated November 2015 regarding the above planning application acknowledged and took account of the objections lodged in representations. Nevertheless, it concluded by recommending approval of the proposed scheme subject to planning conditions. That report's conclusions and recommendations were based on its detailed assessment, which found, firstly, that the principle of housing development on the site accords with the local development plan policy Hou 1. This policy sets out support for housing development on suitable sites within the urban area.

12. That same report, whilst acknowledging that the proposal would involve an overall loss in the amount of open space at this site, points out that in excess of 500 square metres of the site would be retained as a new, good quality area of public open space (to be secured through a legal agreement) – such that the detailed terms of policy Os 1 of the adopted local plan would be met. In addition the report points out that the developer also undertook to provide an agreed sum to support improvements to another playing field 1.5km from the site – such that the terms of policy Os 2 of the adopted local plan would be addressed satisfactorily. I note that the equivalent policies to Hou 1, Os 1 and Os 2 of the adopted plan are policies Hou 1, Env 18 and Env 19 respectively of the proposed new plan.

13. Whilst I have had regard to the scope and terms of the objections lodged – as summarised above - I conclude that the overall assessments made in the committee report referred to earlier and in its conclusions and recommendations appear to have been fair, balanced and soundly based. Furthermore, for the following reasons I conclude that very similar considerations and reasoning would apply in respect of the representation lodged seeking allocation of this site in the proposed plan.

14. Firstly, I am satisfied that, notwithstanding the concerns expressed by local objectors on this matter, in reality the resulting quantitative loss of open space would not necessarily be detrimental to the wider network of open space opportunities still available overall. Indeed, I am persuaded that there would be a net benefit through the upgrading of the open space and playing fields provision on the site in question and in the wider area. This is because the package being put forward appears to offer the opportunity to

ensure retention of a smaller but more accessible and more attractive area of public open space than is available today on the site in question, as well as the means of securing – through a legal agreement - an upgrading of the relocated sports pavilion on the site and improved sports provision elsewhere in the locality, to address existing deficiencies in such provision.

15. Based on the available evidence and my own site visit, I conclude that the representations made in support of a new allocation in the proposed plan– and articulated more recently in the planning application detailed above - would accord with the terms of policies Hou 1(e), Env 18 and Env 19 for the reasons summarised earlier and elaborated below. I am also persuaded that the very limited scale, form and low density of the development, if limited to 10 houses as proposed, would not be likely to place significant or unsustainable additional pressure on existing facilities and services, such as roads, schools and drainage capacities. Similarly, in my opinion the arguments put forward by objectors in suggesting that the proposal would result in unacceptable losses of trees or views to Arthur's Seat or a significant reduction in the biodiversity of local habitats are not persuasive. Whilst the pavilion is a listed building it appears neglected and vulnerable. In this context I conclude that its future would probably be best secured and its architectural integrity safeguarded through its proposed relocation and restoration, as part of the overall package being proposed. Furthermore, I consider that the overall package of proposals would be compatible with the character of the surrounding residential areas and the conservation area.

16. Notwithstanding all of the above, I find that the small scale of the proposal – for around 10 housing units accompanied by the other related measures, including the pavilion relocation and restoration – makes it inappropriate for formal allocation in the plan. Accordingly, I conclude that the merits of any development package for this site is more appropriately explored and assessed through the Development Management process – by the lodging and processing of a planning application. That process would allow the detailed case for its development to be fully assessed prior to any planning permission being granted, if deemed appropriate by the planning authority. The site would then count towards the substantial windfall contribution that the council relies on to meet the housing target.

<u>Allison Park, Kirkliston</u>

17. This representation proposes a "trade-off" arrangement with part of the playing fields site adjoining Kirkliston Primary School being allocated for 40 houses - on the basis that this would generate funding to upgrade the rest of the park area situated alongside that site. I do not find this argument persuasive even though the site in question is reasonably well contained and adjoins existing housing areas.

18. In summary, the case put forward in the representation provides insufficient justification to sacrifice a substantial part of these playing fields and open space for housing development. At my site visit I noted that the playing fields here are in good condition and appeared to be actively used and managed - such that they are not in obvious, urgent need of remedial work or upgrading to secure their future well-being and community use. The only limitation on their use as a public open space at present is the fact that there is no direct access to this site from the north as the site is fenced off from the adjoining new housing and the neighbouring school premises. The site is also enclosed by trees and bushes to the south and west – such that it can only be accessed from the east.

19. I am also concerned that the proposal would not accord with the terms of policies Env 18 and Env 19 of the proposed plan. Those policies set specific criteria to be met prior to the release of public open space and playing fields - which in this case would not be satisfied. Furthermore, in my opinion the resulting loss would be detrimental to the wider network of open space and playing field provision serving the area – without adequate alternatives or upgraded provision elsewhere being put forward to offset that satisfactorily. Having had regard to all of these considerations, I conclude that the site in question should not be allocated, even in part for housing development. Accordingly, I conclude that no modification to the proposed plan has been justified in response to the representation lodged.

Parcels of open space at Gilbertstoun

20. The representation identifies a number of parcels of public open space in the Gilbertstoun residential area that are regarded as being in poor condition and more sensibly developed for housing. In response, I would point out firstly that even if it was demonstrated that some or all of these fragmented parcels and wedges of open space are not currently being well maintained or widely used, this is not sufficient reason to justify reallocating them to provide additional small pockets of housing land. In any event, in principle their fragmentation would render these very small sites inappropriate for allocation in the plan. Parts of these areas also include some woodland, which adds to their ecological interest as well as contributing to the local setting for Brunstane House.

21. Furthermore, I share the council's view that these pockets of open space, which run through this housing area, have an important role in providing amenity for local residents. As such, I regard these open space areas as being an integral part of the overall layout of the residential area concerned. Accordingly, I conclude that they should not be given over to provide small additions to the housing stock as this cannot be justified simply on the basis that at present they could be better maintained and used more.

22. Based on all of these considerations I conclude that there is no merit in modifying the plan in response to this particular representation.

Telferton, Portobello (Reporter: Allison Coard)

23. On my site visit I noted the site is currently well used as an area of allotments. The land is tucked away behind the housing on Inchview Terrace to the north of a small estate of commercial premises. There is no existing vehicular access to the site and it would lack any established street frontage. Despite the obvious constraints of developing a long narrow back-land site of this nature there is no justification for loss of this area of protected open space or its loss as a valuable community resource for allotment use.

24. The submissions indicate a proposal of some 30 units retaining around 24 allotment plots extending Parker Terrace to connect with Telferton via a priority junction with the majority of units being accessed directly from Parker Terrace. A transport statement has been prepared which concludes that the site is accessible and would have a negligible impact on the local road network. I note the statement that the current allotment use of the site is not authorised by the owners and that the proposal would formalise this use on part of the site.

25. Policy Env 18 on Open Space sets out a range of criteria against which proposals involving the loss of open space will be considered. In summary these include the

availability of alternative provision. the avoidance of detriment to the open space network and that the benefits to the local community would outweigh the loss. I consider I have insufficient evidence at this time to demonstrate compliance with this policy. Irrespective of the allotment use of the site which is essentially a legal matter beyond the scope of this examination the site is retained as open space. Loss of this space would require justification in the context of the policy.

26. Any future application for development on this site would fall to be considered in the context of Policy Env 18 and other relevant plan policies. At this time, I consider there is a lack of justification for this loss of open space and my conclusion is that the site should be retained for this purpose.

Hillpark Avenue/Craigcrook Road

27. The site concerned is an area of open ground with mature trees situated close to the traffic light junction of Craigcrook Road and Queensferry Road. The latter forms part of the A90 road, which is the main arterial route linking the city centre with the Forth Road Bridge. The representation, in support of an allocation for residential development, argues that as the site concerned is not currently accessible to the public its loss as open space would not be significant. In itself I do not find this as being sufficient reason to allocate the site for housing even though the surrounding area is primarily residential in character. In any event, as the representation seeks allocation for either 2 dwellings or 6 flatted units, I regard this as being too small to be considered as a formal allocation in the plan, irrespective of the merits of the proposal.

28. Accordingly, based on these considerations alone I conclude that there is no justification to modify the plan to allocate the site in question for residential development. Any proposals for this site would most appropriately be brought forward as a planning application for detailed assessment through the Development Management process prior to any planning permission being granted, if the scheme was deemed acceptable. That assessment by the planning authority would, alongside other material considerations, evaluate conformance with the relevant development plan policies, and be likely to have close regard to other matters such as accessibility and residential amenity, particularly given the proximity of the site to the main A90 road junction.

371 Lanark Road West (Reporter: Allison Coard)

29. The representation seeks allocation for approximately 80 houses in what is regarded as a brownfield site by the Water of Leith. There is no dispute in the submissions that the site is brownfield. It is on an area of Lanark Road West with established residential development along the roadside frontage. However this site extends down into the Water of Leith Valley and an area of long established green belt. I consider development on the scale proposed would impact on the objectives of designating the surrounding valley as open space and in recognising its role in providing a long term defensible green belt boundary.

30. The plan, through policy Hou 1 makes provision for the consideration of sites in the urban area through the planning application process. Not all brownfield sites, where development has historically occurred, will prove suitable in the current planning context. The site is in a particularly sensitive location surrounded by an area of designated open space and where green belt policies apply. In my view it unlikely that it could accommodate the scale of development proposed in this representation as this would run

contrary to the established pattern of development. Consequently, I consider that any future proposals for this site are more appropriately considered through the development management process where there would be scope for more detailed matters of layout, landscaping, density and design to be fully considered.

Calder Road/Broomhouse Road Site

31. This brownfield site is largely cleared open ground that was formerly occupied by a block of multi-storey flats that have been demolished. The site is bounded by the A71 road (Calder Road) to the south and by Broomhouse Road to the east – each of which serves as the edge to established residential areas. Immediately to the west of the site is Napier University's Sighthill campus and the northern edge of the site is marked by a line of mature trees that separate the site in question from a public park (Sighthill Park).

32. Whilst the council does not see merit in allocating this site for housing development in the new plan, it acknowledges that there is a masterplan for its redevelopment and notes that planning permission in principle was granted for the site's redevelopment in 2013. The council has provided no compelling evidence to support its position that, notwithstanding all of the above, it does not regard the site in question as being appropriate for formal designation as a residential allocation in the new plan. Accordingly, it appears to be advocating that any take up of this site's planning permission should be regarded instead as a windfall development.

33. I note that the permission granted in 2013 (13/03147/PPP) renewed an earlier permission (10/00953/PPP) granted in 2010. The proposed development that was granted consent in 2013 includes a mix of housing for sale (with the same number of units but comprising a different mix of flats and houses than proposed previously) as well as community facilities (including a community centre and library) and shops. These and ancillary components were laid out in an overall illustrative masterplan for the site. The council's Report of Handling and Committee Report set out a detailed assessment of the proposals prior to permission being granted for the renewal of the 2010 permission. That report concluded that the proposals comply with all of the relevant development plan policies – and I note that this included, amongst others, specific reference to policies Hou 1 and Os 1 of the adopted local plan. Having had regard to the available evidence, I have no reason or basis to disagree with that assessment and so conclude that it would accord with equivalent policies (Hou 1 and Env 18) of the proposed new plan.

34. In summary I am satisfied that there is a valid planning permission in principle for development for the site concerned and note that this is a housing led proposal – comprising primarily a mix of housing for sale and affordable housing units. Whilst this establishes the principle of residential development on the site, I acknowledge that the exact number of units may change if and when a detailed scheme is drawn up and formally approved by the planning authority.

35. Given the current status of the site in question, I conclude that there is no need or justification for me consider the representation further. In the light of the updated position, I have given consideration as to whether or not this planning permission should be recorded as a new allocation in the plan or simply acknowledged as a 'windfall' development. In this case the site concerned is not within one of the identified SESplan Strategic Development Areas and the proposal is an urban infill development. Indeed I find that it is one that can come forward in the context of policy Hou 1 of the proposed plan that supports appropriate urban developments in the urban area. The council has

assumed a substantial contribution for such windfall developments as referenced in Issue 5. Based on all of these considerations I conclude that this should simply be acknowledged as a windfall development and so not formally allocated in the plan.

Bonnington Industrial Estate

36. This is an established industrial estate on the north side of the city, in an area characterised by mixed uses, including older and recent residential developments. Indeed there are examples near the site in question of former industrial premises, including mill buildings that have been converted to residential use and other redundant commercial sites that are being redeveloped for housing. The representation points out that some years ago the local plan for the area allocated the site in question for business and industrial uses, but that was changed in the current adopted local plan. There, as in the proposed new plan, the site is simply shown as being part of the "urban area". In support of their case the representation cites the Bonnington Development Brief, approved in 2008, which proposed most of this site to be designated for residential and small business space. I note that under policy Hou 1 of the new plan, in principle its current "urban area" designation would allow residential development here - provided that any proposals can be shown to be compatible with the other relevant policies of the plan.

37. In this context I note that the site concerned was included in the council's Housing Land Study as part of preparation for the new plan - so its longer term potential for consideration as a possible housing site has been recognised by the council as at least worth exploring. Nevertheless, on my site visit I noted that whilst there are currently some existing vacancies there is no evidence of all the commercial units at Bonnington Industrial Estate becoming disused.

38. Based on all these considerations I conclude that at this time there is insufficient justification for the site to be formally allocated for residential development. This, however, would not prevent proposals for the site being brought forward as a planning application for residential or mixed development. Any such proposal would then be the subject of a detailed assessment through the Development Management process. That would be necessary prior to any planning permission being granted so that the planning authority would, alongside other material considerations, evaluate conformance with the relevant development plan policies, as well as being likely to have close regard to other relevant matters such as layout, design and accessibility.

North West Edinburgh: East Kirkliston

39. The reference made in this representation seeking allocation of a site in East Kirkliston is unspecific with regard to its location. I am also concerned that the representation, beyond stating the housing allocations would be "incomplete without inclusion of that site, along with 2 other sites in Queensferry (each of which is discussed below) and no substantive case has been made in support of this position with regard to East Kirkliston. The only stated justification being that the full impact of all housing proposals in Rural West Edinburgh should be assessed together.

40. As the council points out, the land to the east of Kirkliston is designated as green belt in the local development plan. I also note that other representations seeking new housing allocations to the east of Kirkliston are examined under Issue 15. I refer to the conclusions relating to these sites, which address the green belt and other issues relevant to the consideration of these potential housing sites in this location. I therefore

conclude that there is no need for me to further consider these non-site specific representations relating to potential housing sites to the east of Kirkliston.

Ferrymuir

41. This vacant site, extending to 4.5 hectares, is situated on the southern edge of Queensferry. It is located immediately to the south-east of a modern, mixed use commercial area that includes a large food superstore, a hotel and offices. The site is bounded to the south and west by the main A90 road that connects Edinburgh with the existing Forth Bridge crossing. Along its eastern edge is the B800 road that links Queensferry with Kirkliston.

42. Whilst the representations contend that the site in question should be formally allocated for residential development in the new plan, I note, firstly, that the existing local plan promotes development of this site for Class 4 employment uses. Nevertheless, I also note that the proposed plan indicates removal of that designation and for the site instead to be included in the "urban area" designation. The council acknowledges that, under policy Hou 1 of the new plan, in principle this would allow residential development here - provided that any proposals were deemed to be compatible with the other relevant policies of the plan.

43. In the above context, I note that in 2014 a planning application was lodged (14/04172/FUL) seeking planning permission for 143 housing units on the site – in a mix of houses and flats that incorporates 25% affordable units. Prior to that application being determined, the planning officer's report to committee in August 2015 concluded that the application was in conformance with all the relevant policies of the new local development plan and on this basis recommended approval of the proposal. It has since been drawn to my attention that on 1 December 2015 this planning application was granted consent subject to a number of planning conditions.

44. Given the current status of the site in question, I conclude that there is no need or justification for me consider the representation further. In the light of the updated position, I have given consideration as to whether or not this planning permission should be recorded as a new allocation in the plan or simply acknowledged as a 'windfall' development. In this case the site concerned is not within one of the identified SESplan Strategic Development Areas and the proposal is an urban infill development. Indeed I find that it is one that can come forward in the context of policy Hou 1 of the proposed plan that supports appropriate urban developments in the urban area. The council has assumed a substantial contribution for such windfall developments as referenced in Issue 5. Based on all of these considerations I conclude that this should simply be acknowledged as a windfall development and so not formally allocated in the plan.

Old Corus Motel site

45. This former hotel site is now relatively flat, cleared ground that has an elevated position in the built-up area of Queensferry, overlooking the existing Forth Bridge crossings. It is flanked to the north, east and south by existing housing areas. The Forth Bridge road management offices and car park are located immediately to the west.

46. The representations contend that the site should be formally allocated for residential development in the new plan – as it is in the existing adopted (Rural West Edinburgh) local plan. I note that the proposed new plan indicates removal of that designation and

for the site instead to be simply included in the “urban area” designation – noting that the site was regarded as “constrained”. Nevertheless, the council acknowledges that, under policy Hou 1 of the new plan, in principle the urban area designation would allow residential development here - provided that any proposals were deemed to be compatible with the other relevant policies of the plan.

47. In the above context, in 2014 a planning application was lodged (14/01509/PPP) seeking planning permission in principle for up to 125 housing units on the site. I note that on 8 October 2015 that application was granted planning permission in principle by the council, subject to a number of planning conditions. I conclude that this establishes the principle of housing development on the site in question – even if the number of units may change when a detailed scheme is approved by the planning authority.

48. Given the current status of the site in question, I conclude that there is no need or justification for me consider the representation further. In the light of the updated position, I have given consideration as to whether or not this planning permission should be recorded as a new allocation in the plan or perhaps more appropriately as an existing site in Table 3 given that it is carried forward from the previous local plan. However, it is an urban infill site that would in any event be supported through Policy Hou 1 and there is no corresponding redefinition of green belt or countryside boundaries. The council has assumed a substantial contribution from windfall developments as referenced in Issue 5. Based on all of these considerations I conclude that the site can contribute to this windfall supply and need not be specifically allocated in the plan.

Reporter’s recommendations:

No modifications to the proposed plan.

Issue 18 Appendix A – East Suffolk Road

0115	Francesca Bray
0116	Alexander Robertson
0138	Peter Laing
0144	Frances Grieve
0146	Ronald Macarthur
0149	Hilary Spenceley
0150	William Grieve
0152	Alison Riach
0154	John O'Brien
0157	Albert Clowes
0158	Marilyn Higgins
0159	Sallie Clowes
0168	L. Ben Brahim Lotfi
0177	P M Williams
0179	Neil Clifton
0197	Stanley Davidson
0199	Luz Maria Buckland
0200	Hilary McGuire
0201	Kay Boulton
0202	Ian WR Malcolm
0211	Lionel Jackson
0212	David Ainslie Thin
0213	Shona McLean
0226	Will Hean
0227	John Kelly
0237	Peredur Williams
0238	Dale Finlayson
0251	Emily Owen
0268	Morag Yellowlees
0272	Patricia Bagheri
0273	Jenny Dewar
0274	Colette Backwell
0290	Rana Sallam
0291	Jean Burns
0292	Patrick Prenter
0293	Wilma Elton
0294	Robert Wilton
0299	Ian Murray
0304	DC McKean
0313	Lilias Thain
0317	SJ Closs
0318	John Mykura
0319	I Maxwell
0325	Elizabeth Philp
0348	G Walker
0349	David Michie
0353	Diana Philipson
0361	Anne Semple
0375	M.J.R Simpson
0377	Jane Darling
0389	Elspeth Dougall
0394	Ann Simpson
0410	Gerald McGovern
0419	Rosemary Langeland
0441	Graham Doherty
0486	Muriel Evans
0502	Mark Dewar
0504	Brian Bain
0538	Andrew Ranicki
0539	Ida Thompson
0558	Mervyn Jack
0565	Deborah Adlam
0569	Valerie Akhtar
0583	Ian Green
0612	Jacqueline Johnson
0633	Jean McMillan
0706	Flora Wotherspoon
0851	Kate Dewar
0925	Margaret Hunter
0930	T.E Dickson
0976	Tim Mckay
0977	Sheila Kirk
1032	Brian Johnston
1047	R.J.M Wilson
1105	Rosa Bisset
1111	Sheila Burtles
1115	Richard Burtles
1117	St Clair Taylor
1119	Peter Bloomfield
1145	John Forrest
1448	Valery Devlin
1486	Imogen Dewar
1651	Alan Dewar
2050	Andrew Johnson
2059	Catriona Kelly
2071	Mike Mitchell
2113	Charles Aspinall
2232	Sean Keaveney
2258	Lindsey Harkins
2338	Fraser Nevett
2340	Iain Gordon
2361	Tim Arnold
2378	Rachel Jones
2448	Katherine Ivory
2523	Merrilie Cameron
2537	Allen Simpson

Issue 19	**Transport Proposals & Resources and Services Proposals**	
Development plan reference:	**Part 1 Section 3 Pages 33 – 38 Proposals Map Part 1 Figure 9, Table 9, Figure 10**	**Reporter:** Lance Guilford

Body or person(s) submitting a representation raising the issue (including reference number):

0225	Cramond & Barnton Community Council
0243	Friends of the River Almond Walkway
0245	West Lothian Council
0256	Hopetoun Estate Trust/Aithrie Estates/Hopetoun House Preservation Trust
0360	Grahame Whitehead
0432	Greener Leith
0510	Morningside Community Council
0641	Cammo Residents Association
0651	M Allen
0672	Scottish Rights of Way & Access Society
0743	Mark Sydenham
0749	Cramond and Harthill Estate
0755	BDW Trading Ltd
0828	Network Rail
1015	John Watson
1159	New Ingliston Limited
1170	A.J.C. Clark
1660	Adrian Graham
1726	Marchmont & Sciennes Community Council
1739	South East Scotland Transport Partnership
1789	Corstorphine Old Parish Church
1955	Royal High School Parent Council
1964	Grange Association
1986	East Craigs Wider Action Group
2013	Transport for Edinburgh Ltd
2088	Scottish Government
2093	Aldi Stores Ltd
2116	Blacket Association
2126	Cockburn Association
2146	Transform Scotland
2173	K J Wilson
2354	Grange/Prestonfield Community Council
2480	Rosebery Estates Partnership
2517	Britannia Quay Proprietors Association
2687	Leith Central Community Council
2690	West End Community Council
2697	Scottish Natural Heritage
2700	Midlothian Council
2706	Juniper Green Community Council

Provision of the development plan to which the issue relates:	This part of the plan identifies a number of measures needed to support existing development proposals, including the transport interventions needed to mitigate the impact of the new strategic housing sites on the transport network. Table 9 also identifies proposals and safeguards for public transport and active travel. This section also sets out safeguards and proposals for resources and services: waste management; mineral deposits; telecommunications.

Planning authority's summary of the representation(s):

CONTEXT

Transport proposals that serve or intend to mitigate the impacts of the housing proposals are informed by the Plan's Transport Appraisal Addendum. The approach to waste management was the subject of consultation on the Main Issues Report.

TRANSPORT PROPOSALS AND SAFEGUARDS

General

- The realisation that public transport is faster and more time-reliable than private transport is a powerful motivator in favour of the latter. **(2126-1 Cockburn Association)**
- Considers that it may be necessary to consider diverting some traffic onto the existing Forth Road Bridge if the new Forth Road crossing becomes congested. **(2126-2 Cockburn Association)**
- Concern that the plan does not sufficiently reflect the strategic framework provided by the Strategic Development Plan and the Regional Transport Strategy. **(1739 South East Scotland Transport Partnership)**
- Considers a multi modal transport system prior to a development encourages unnecessary car use with its potential to create congestion and atmospheric pollution. **(2126-3 Cockburn Association)**
- Supports paragraph 86 regarding the link between new development and the transport network. Considers that it is essential that any significant new housing should be located where transport links already exist or can easily be developed. Concern at development in the South West where transport facilities are already under pressure. **(2706 Juniper Green Community Council)**
- Supports the transport objectives, the statement that planning permission will not be granted for a development that would prevent the implementation of proposed cycle/footpaths shown on the Proposals Map, and requiring out of centre development to demonstrate that access by sustainable forms mean that the development will be no more reliant on car use than a town centre location. **(2146 Transform Scotland)**

Cross boundary Issues

- Amend the reference to the Newbridge roundabout and associated road network in T12, specifically the A89 and A8, to more fully address cross boundary considerations. As indicated in the transport appraisal that takes in to account the likely effect of committed development, as well as new allocation in both Edinburgh and surrounding local authorities. **(0245 West Lothian Council)**
- Recommendations state that LDPs will take account of the cross-boundary transport implications of all policies and proposals including implications for the transport network outwith the SESPlan area. It has been recognised that cross boundary effects were not satisfactorily addressed within the SESplan area and as a consequence require to be addressed by its constituent authorities. This issue is of particular concern to Transport Scotland with regard to the A720. **(2088 Scottish Government)**
- Reflect the current status and contents of the study into Public Transport Improvements at Newbridge. **(2088 Scottish Government)**
- Cross boundary liaison is required to successfully implement Transport Safeguard and Proposals T16 West of Fort Kinnaird road to the Wisp and T21 Burdiehouse Junction. **(2700 Midlothian Council)**
- Greendykes Public Transport Link (T6) is now constructed and joins the Wisp in Midlothian at a point further south. **(2700 Midlothian Council)**

Transport Proposals and Safeguards – West Edinburgh

- In principle, supports Proposals T9-21. All are needed now irrespective of proposed new development. T13 and T14 should be viewed as the same project. Construction traffic could cause problems if the Maybury junction is not improved in advance. **(2126-4 Cockburn Association)**
- Amend Proposal T17 to require that Turnhouse Road is kept open for emergency vehicles into the airport. **(1015 John Watson)**
- Transport Proposal T9 scheme should be developed through detailed examination. **(1159 New Ingliston Limited)**
- Transport Proposal T10: concern over cost and effectiveness of a public transport only link. **(1159 New Ingliston Limited)**
- Transport Proposal T11: objects to any presumption that the International Business Gateway should fund this junction that is needed solely to serve a re-located Royal Highland Showground. **(1159 New Ingliston Limited)**
- Transport Proposal T12: supports a detailed study of pragmatic and deliverable options for Newbridge. **(1159 New Ingliston Limited)**
- Transport Proposal T13: supports the detailed study of pragmatic and deliverable options for Gogar. **(1159 New Ingliston Limited)**
- Seeks additional comments on the Action Programme. **(1159 New Ingliston Limited)**
- Considers Transport Proposals T17-19 are misleading as to the effects they will achieve; increasing efficiency of the traffic signals will have little impact at junctions that are at or over capacity. An additional lane is required to Maybury Road. The introduction of bus lanes at Maybury junction and a new signal controlled junction will impede traffic flows and exacerbate congestion on Maybury Road. **(0225 Cramond & Barnton Community Council)**
- Amend Transport Proposal T17 to fully show how the increased vehicle traffic can be catered for. Difficult to see how bus priority and better provision for pedestrians and cyclist can be achieved. This junction is counter to the Plan's aim to support growth of the city economy, and will be exacerbated by new housing at Cammo and Maybury. **(0360 Grahame Whitehead)**
- Junction improvements at Maybury, Transport Proposal T17, should be done before now as there is no guarantee they will work, and to mitigate the impact of the construction traffic. **(1015 John Watson)**
- Amend Transport Proposal T19 fully as it lacks credibility. Barnton junction is already at capacity. Proposed traffic signal changes would have been done already to solve current problems. Traffic from new housing at Cammo and Maybury will exacerbate the congestion. **(0360 Grahame Whitehead)**
- Reword Transport Proposal T19 to recognise the reality of the situation and provide for more substantial improvements to Barnton Junction. More substantial improvements are required to this junction to achieve the stated objectives of increasing the junction's capacity. **(0651 M Allen)**
- The Craigs Road junction was not included in the scope of the transport appraisal undertaken for the Council in relation to the Cammo site, and mitigation is disputed until there is evidence to verify this requirement. Further comments on the indicative costs included in the Action Programme. **(0749 Cramond and Harthill Estate)**
- If the improvements to the Maybury and Craigs Roads junctions are left to when housing construction starts this may cause traffic gridlock. The footpath and cycleway proposals in the Maybury Site Brief, linking housing with the Gyle

Shopping Centre, should be an underpass for increased safety at the A8 crossing. **(1789 Corstorphine Old Parish Church)**

- Seeks clarification on how pedestrian movements and safety will be considered in the Barnton Junction proposals, including any potential rat-running through Cramond and Davidsons Mains. Existing concerns over pedestrian safety crossing Queensferry Road. There is no mention of how secondary pupils from the Maybury development will safely get to their High School. **(1955 Royal High School Parent Council)**
- Seeks the removal of the Transport Proposals in Table 9 relating to Cammo and Maybury (HSG 19 and HSG 20). Concerned that no detailed transport modelling and capacity appraisal of the Barnton and Maybury junctions have been undertaken. The road is already operating at capacity and the transport proposals are contrary to Scottish Planning Policy, the aims of the Plan and the West Edinburgh Planning Framework and are inadequate. **(0641 Cammo Residents Association)**
- Request that the Council undertakes further assessments of Transport Proposals T17, T18 and T19 and that its baseline shows the junctions as congested. **(1986 East Craigs Wider Action Group)**

<u>Other Transport Proposals and Safeguards - Cycle and Pedestrian Routes</u>

- Remove the Transport Proposal footpath/cycleway safeguard at 376 Gilmerton Road. The site it runs across is under construction as a supermarket. **(2093 Aldi Stores Ltd)**
- Embed active travel improvements into other relevant transport proposal safeguards to ensure a consistent approach across all junction improvements. **(2697 Scottish Natural Heritage)**
- Supports policy to enhance off road cycle and footpath links, especially the cycle/pathway safeguards Transport Proposal T8 at the Royal Edinburgh and Astley Ainslie Hospital grounds for various reasons including: essential to deliver the policy ambition set out in Policy Tra 8; is currently extensively used by families, school children and commuters and is vital that open public access remains; and would welcome its elevation to core path status. **(2354 Grange/Prestonfield Community Council; 01726 Marchmont & Sciennes Community Council; 0510 Morningside Community Council; 1964 Grange Association; 0672 Scottish Rights of Way & Access Society)**
- Supports all cycle and footpath plans and potential additions and improvements need to be safeguarded. **(2690 West End Community Council)**
- Add a cycle/footpath safeguard along the length of the River Almond westwards between Kirkliston and the railway over-bridge north of Turnhouse and north-east corner of Edinburgh Airport land; and eastwards from Cramond Brig to Grotto Bridge and on to the railway bridge. The length of the River Almond between Kirkliston and the railway over-bridge north of Turnhouse and north-east corner of Edinburgh Airport land is a potential core path section of core path CEC 11 River Almond Walk in the Core Paths Plan. Its inclusion would comply with Tra 8 to 'ensure that development proposals do not prejudice the future implementation of potential additions or improvements to off-road routes across the city.' **(0225 Cramond & Barnton Community Council; 0243 Friends of the River Almond Walkway)**
- The 'Leith Walk Green Bridge' (running from the Water of Leith exit at West Bowling Street via Anderson Place, through Pilrig Park, over a green bridge over Leith Walk,

Manderston Street, Gordon Street and Thorntree Street connecting to the existing cycle path) proposal has local public support and should be recognised and safeguarded in the plan. **(2687 Leith Central Community Council; 0432 Greener Leith; 1660 Adrian Graham)**

- Welcomes the cycle provision from McDonald Road through to Lochend. (**1660 Adrian Graham)**
- Disappointed there are very few additional cycle routes shown on the Proposal Map, these routes are of particular benefit to school children. **(2116 Blacket Association)**
- The 'Family Network' in T8 must include routes that enable people with diverse mobility needs. **(2126-5 Cockburn Association)**
- Change the cycle/footpath route at Newcraighall Road as it uses an underbridge that has now been infilled. **(0828 Network Rail)**
- Seeks clarification of suitability and timing of identifying cycle/footpath link from Albion Gardens to Powderhall. Network Rail operates this as a freight route. **(0828 Network Rail)**

Other Transport Proposals and Safeguards – Road and Public Transport

Road

- *Seeks clarification that the temporary access road from Echline to Shore Road will be upgraded to permanent status.* ***(0256 Hopetoun Estate Trust/Aithrie Estates/Hopetoun House Preservation Trust)***
- *Add new transport safeguard in Table 9 to realign Lower Granton Road to the north and seek developer contributions for this proposal as a priority and insert it as a Development Principle for Granton Harbour. This road is unable to deal with current traffic levels and traffic impact assessments have identified it as inadequate to cope with predicted traffic increases. Its realignment was included in the Forth Ports legal agreement.* ***(0743 Mark Sydenham)***
- *Add a safeguard to Table 9 for the Currie Bypass, as shown in the Rural West Edinburgh Local Plan, in order to mitigate increased traffic generation.* ***(1170 A.J.C. Clark)***
- Capacity improvements at the Newbridge roundabout are not limited to the M9 and A8 – other approaches are being considered as part of the study into Public Transport improvements at Newbridge. **(02088 Scottish Government)**
- *Supports the extension of Ocean Drive as identified on the Proposals Map and T15.* ***(0828 Network Rail)***
- *Accepts the need for the junction improvements in Transport Proposal T21.* ***(0755 BDW Trading Ltd)***
- *Make the Old Dalkeith Road arm of Sherrifhall roundabout devoted entirely to public transport and cycle use, as part of its enhancement.* ***(2126-6 Cockburn Association)***
- The Park and Ride sites and the Edinburgh Orbital Bus route are essential to support the scale of development in South East Scotland in the coming years. **(1739 South East Scotland Transport Partnership)**
- Any potential widening of the Bypass to accommodate dedicated bus lanes would cause further losses to the green belt. **(2126-7 Cockburn Association)**

Rail

- While the high speed rail is a longer term proposal, key decisions on viability and routing are likely to be taken in the shorter term. **(1739 South East Scotland Transport Partnership)**
- Supports Transport Proposal T2 and the safeguarding of the 'Almond Chord' and the identification of the Abbeyhill line to provide a turnback facility. **(0828 Network Rail)**
- The safeguard of the site of the former Abbeyhill station should not prejudice the reinstatement of a station on that site. **(2126-8 Cockburn Association)**
- Welcomes the safeguarding of the two halts on the South Suburban Rail Line at Cameron Toll. **(2116 Blacket Association)**
- Considers second sentence in Transport Safeguard T4 in Table 9 to be prejudicial and that the Plan should be even-handed in its approach to different modes of transport and their future safeguarding. Considers that any decision as to the viability of the reopening of passenger traffic services on the South Suburban Railway should not be for the rail operator alone. Notes that the line itself is no longer safeguarded. **(1964 Grange Association; 2354 Grange/Prestonfield Community Council)**

Tram

- Reword Transport Proposal T1 in Table 9 to ensure that the safeguarded tram route, particularly from Newhaven to Ocean Terminal, is wide enough to ensure open views are preserved and new buildings are set back to preserve safety and privacy of occupiers. This does not appear to have happened in recently completed development at south west corner of Chancelot Mill which is excessively close to the proposed tram route. **(2173 K J Wilson; 2517 Britannia Quay Proprietors Association)**
- Concern raised over the adverse visual impacts of tram overhead wires on sensitive areas. **(2126-9 Cockburn Association)**
- Welcomes the safeguarding of the tram route past Cameron Toll. **(2116 Blacket Association)**
- Delete Transport Proposal T1 as there should be no further tram phases connecting the waterfront, the South East or Newbridge. Concern over cost and that the first phase was based on flawed market research. **(0360 Grahame Whitehead)**

RESOURCES AND SERVICES PROPOSALS

- Seeks clarification in the supporting text on waste and resources including what energy measures the Council is involved in, other than Millerhill, where are the additional waste collection plants; discuss with the Scottish Government to ensure more waste is processed in Scotland; and improve on street commercial waste facilities. **(1170 A.J.C. Clark)**
- Identify Craigiehill Quarry in Figure 10 and in the Proposals Map as an operational quarry and safeguard it for future waste management use once the minerals have been exhausted. **(2480 Rosebery Estates Partnership)**
- Supports paragraph 91 in principle, but the Plan could indicate what measures are used to prevent the spread of invasive species during the composting process. **(2126-10 Cockburn Association)**
- Add new sentence in paragraph 87 after "telecommunications': 'Wherever possible,

network services should be installed prior to developments'. **(2126-11 Cockburn Association)**

Modifications sought by those submitting representations:

TRANSPORT PROPOSALS AND SAFEGUARDS

General

- Add new sentence to paragraph 83: 'More opportunities will be sought for bus priority within the city centre and also on radial routes, such as 'First away at the lights'; and clearer bus lane marking and timings'. **(2126-1 Cockburn Association)**
- Add a new final sentence to paragraph 84: 'The suitability of this arrangement will be monitored'. **(2126-2 Cockburn Association)**
- Refer in paragraph 84 to the proposals in the Public Transport Strategy associated with the new Forth Road Bridge, e.g. the proposed slips onto the B800 from the M9 spur. **(1739 South East Scotland Transport Partnership).**
- Add new final sentence in paragraph 86: 'Wherever possible, transport infrastructure will be installed before developments take place'. **(2126-3 Cockburn Association)**

Cross boundary Issues

- The Plan requires to recognise and define the requirements for the appraisal of the impacts and mitigation of consequences of the cross boundary effects of development, specifically those relating to trunk road network. The Plan needs to identify potential interaction of traffic generated by developments within the Edinburgh Council area and infrastructure outwith this boundary. **(2088 Scottish Government)**
- Refer in the Transport Proposal / Safeguards T16 and T21 in Table 9 to cross boundary liaison required to successfully implement these proposals. **(2700 Midlothian Council)**
- Amend Transport Safeguard T6 Greendykes Public Transport on the Proposals Map: it has been constructed and where the road joins The Wisp is at a point further south. **(2700 Midlothian Council)**

Transport Proposals and Safeguards – West Edinburgh

- In principle, support is given for the Transport Proposals T9-21, and all are needed now irrespective of proposed new development. T13 and T14 should be viewed as the same project. Construction traffic could cause problems if the Maybury junction is not improved in advance. **(2126-4 Cockburn Association)**
- Amend the reference to the Newbridge roundabout and associated road network in T12 to more fully address cross boundary issues. **(0245 West Lothian Council)**
- Replace wording of Transport Proposal T12 Improvements to Newbridge 'and/or enhanced lane capacity on M9 and A8' with 'and capacity improvements on approach roads'. **(2088 Scottish Government)**
- Amend the description of Transport Proposal T17 in Table 9 to require that Turnhouse Road is kept open for emergency vehicles into the airport. **(1015 John Watson)**
- Reword Transport Proposal in relation to West Edinburgh/International Business Gateway once the 2014 transport study is completed. **(1159 New Ingliston**

Limited)

- Seeks more substantial proposals for improvements to the Maybury junction in Transport Proposal T17 including the introduction of an additional east-bound lane on the approach to Maybury junction. **(0225 Cramond & Barnton Community Council)**
- Remove reference to the Craigs Road junction being required to mitigate the impact of new housing in Transport Proposal T18. **(0225 Cramond & Barnton Community Council)**
- Seeks more substantial proposals for improvements to Maybury junction in Transport Proposal T19. Remove 'required to mitigate the impact of new housing development'. **(0225 Cramond & Barnton Community Council)**
- Amend Transport Proposal T17 to fully show how the increased vehicle traffic can be catered for. Amend Transport Proposal T19 fully as it lacks credibility. **(0360 Grahame Whitehead)**
- Require that junction improvements at Maybury, Transport Proposal T17, are implemented in advance of housing development. **(1015 John Watson)**
- Reword Transport Proposal T19 to recognise the reality of the situation and provide for more substantial improvements to Barnton Junction. **(0651 M Allen)**
- Delete 'and Cammo (HSG 20)' from Transport Proposal T18 text. **(0749 Cramond and Harthill Estate)**
- Carry out the Action Programme for improving the Maybury and Craigs Road junctions to be carried out prior to the commencement of housing developments in Turnhouse Road and be in concert with the improvements to the Gogar roundabout. **(1789 Corstorphine Old Parish Church)**
- Any alteration to the Barnton junction Transport Proposal T19 may require a corresponding change for pedestrians making their way to and from school. **(1955 Royal High School Parent Council)**
- Amend Transport Proposals T17, T18 and T19. **(1986 East Craigs Wider Action Group)**
- Remove Transport Proposals in Table 9 relating to Cammo and Maybury HSG 19 and HSG 20. **(0641 Cammo Residents Association)**

<u>Other Transport Proposals and Safeguards - Cycle and Pedestrian Routes</u>

- Amend the Proposals Map to remove the safeguarded footpath/cycleway at 376 Gilmerton Road. **(2093 Aldi Stores Ltd)**
- Embed active travel improvements as a requirement to other Transport Proposals including T12, T19 and T21. Seeks update to Transport Proposal T13 to make similar provision for pedestrians and cyclists as at Transport Proposal T14 Sherrifhall Junction Upgrade. **(2697 Scottish Natural Heritage)**
- Add a cycle/footpath safeguard along the length of the River Almond westwards between Kirkliston and the railway over-bridge north of Turnhouse and north-east corner of Edinburgh Airport land; and eastwards from Cramond Brig to Grotto Bridge and on to the railway bridge. **(0225 Cramond & Barnton Community Council; 0243 Friends of the River Almond Walkway)**
- Safeguard the 'Green Bridge' Proposal for a cycle/footpath from the Water of Leith exit at West Bowling Street via Anderson Place, through Pilrig Park, over a green bridge over Leith Walk, Manderston Street, Gordon Street and Thorntree Street connecting to the existing cycle path. **(0432 Greener Leith; 2687 Leith Central Community Council; 1660 Adrian Graham)**
- Support noted for the cycle provision from McDonald Road through to Lochend.

(**1660 Adrian Graham)**

- Include in Transport Proposal T8 a commitment to ensure the improvement of a specified distance of cycle routes within the period of the Plan. **(02116 Blacket Association)**
- The 'Family Network' in Transport Proposal T8 must include routes that enable people with diverse mobility needs. **(2126-5 Cockburn Association)**
- Change the cycle/footpath route at Newcraighall Road as it uses an underbridge that has now been infilled. **(0828 Network Rail)**
- Seeks clarification of suitability and timing of identifying cycle/footpath link from Albion Gardens to Powderhall. Network Rail operates this as a freight route. **(0828 Network Rail)**
- Mention the safeguarding of land associated with the proposed new footbridge at Cramond in Transport Proposal T8. **(1739 South East Scotland Transport Partnership)**

Other Transport Proposals and Safeguards – Road and Public Transport

Road

- Upgrade local roads network in Port Edgar pursuant on development permitted in the area and the role of Hopetoun Estate as a major tourist attraction. **(0256 Hopetoun Estate Trust/Aithrie Estates/Hopetoun House Preservation Trust)**
- Add new Transport Proposal and safeguard in Table 9 to realign Lower Granton Road. **(0743 Mark Sydenham)**
- Add a safeguard to Table 9 for the Currie Bypass. **(1170 A.J.C. Clark)**
- Seeks additional measures in Transport Proposal T7 including bus priority measures along the Niddrie Mains Corridor; the creation of a bus only road between the Jewel and Fort Kinnaird; and the lowering of the road under Newcraighall west bridge to accommodate double decker buses. **(2013 Transport for Edinburgh Ltd)**
- Seeks update to Transport Proposal T13 to make similar provision for pedestrians and cyclists as at Transport Proposal T14 Sherrifhall Junction Upgrade. **(2697 Scottish Natural Heritage)**
- Make the Old Dalkeith Road arm of Sherrifhall roundabout devoted entirely to public transport and cycle use, as part of its enhancement. **(2126-6 Cockburn Association)**
- Mention the park and ride sites associated with the Orbital Bus Route Transport Proposal T5. **(1739 South East Scotland Transport Partnership)**
- The potential environmental impacts of the orbital bus route needs to be clarified. **(2126-7 Cockburn Association)**

Rail

- Clarify or remove 2nd sentence in Transport Safeguard T4 in Table 9. **(1964 Grange Association; 2354 Grange/Prestonfield Community Council)**
- Seeks reference to the potential requirement for a high speed rail route into the city centre, with the Western Approach road corridor as a potential access route. **(1739 South East Scotland Transport Partnership)**
- Apply policy at the former Abbeyhill station in the same manner as the safeguarding of the South Suburban rail halts. **(2126-8 Cockburn Association)**

Tram

- Explore the cost/benefits of ground feed for sensitive parts of an extended network and also of a ground feed retro fit, at an appropriate time and circumstances, for sensitive parts of the first phase of the tram line. **(2126-9 Cockburn Association)**
- Delete Transport Proposal T1. **(0360 Grahame Whitehead)**
- Reword Transport Proposal T1 in Table 9 to ensure that the safeguarded tram route, particularly from Newhaven to Ocean Terminal, is wide enough to ensure open views are preserved and new buildings are set back. **(2517 Britannia Quay Proprietors Association; 2173 K J Wilson)**
- Seeks update to Transport Proposal T1 now that that the first phase of tram is operational. **(2697 Scottish Natural Heritage)**

RESOURCES AND SERVICES PROPOSALS

- Seeks clarification in the supporting text on waste and resources including what energy measures CEC is involved in, other than Millerhill, where are the additional waste collection plants, discuss with the Scottish Government to ensure more waste is processed in Scotland, improve on street commercial waste facilities. **(1170 A.J.C. Clark)**
- Indicate what measures are used to prevent the spread of invasive species during the composting process. **(2126-10 Cockburn Association)**
- Add new sentence in paragraph 87 after 'telecommunications': 'Wherever possible, network services should be installed prior to developments.' **(2126-11 Cockburn Association)**
- Identify Craigiehill Quarry in Figure 10 and the proposals map as an operational quarry. **(2480 Rosebery Estates Partnership)**

Summary of responses (including reasons) by planning authority:

TRANSPORT PROPOSALS AND SAFEGUARDS

General

- Suggestions on public transport management are noted. However these are more appropriately set out in the Council's Local Transport Strategy/Public and Accessible Transport Plan or, for the enhancement of the Sherrifhall roundabout, as part of the consultation on the South East Scotland Transport Partnership's Regional Strategy. No modification proposed. **(2126-1 Cockburn Association)**
- It is not the role of the plan to require future monitoring of the usage of the Forth Road Crossings. Monitoring of trunk road traffic, including the Forth Road Bridge is the responsibility of Transport for Scotland. No modification proposed. **(2126-2 Cockburn Association)**
- No modification proposed however the Council sees merit in part of this representation to recognise in paragraph 84 the proposal to link the proposed slips from the B800 onto the M9 spur as part of the Public Transport Strategy (agreed by the Council and Transport Scotland) associated with the new Forth Road Bridge. **(1739 South East Scotland Transport Partnership)**
- The timescales of transport proposals are set out in the Action Programme and may be subject to change as development proposals progress towards detailed permission and development programming becomes more certain. Phasing, if

required, is more appropriately set in planning permissions. Therefore, it would not be appropriate to include a statement that infrastructure to be installed before development takes place. No modification proposed. **(2126-3 Cockburn Association).**

Cross boundary Issues

This section deals with cross boundary transport issues other than those detailed in the section on West Edinburgh.

- It is noted that LDPs should take account of the cross boundary transport implications of all policies and proposals. The study that Transport Scotland is currently progressing with the SESplan authorities is intended to address cross boundary impacts of the development proposals. The scope is agreed and Transport Scotland is contributing to the study. The outputs of the study will inform future annual iterations of the LDP Action Programme as appropriate. No modification proposed. In the meantime, the LDP Action Programme continues to identify those transport interventions which have been identified in the LDP Transport Appraisal, the scope of which was also agreed with Transport Scotland. The LDP Action Programme included assumptions for baseline traffic growth to allow for some additional development outwith the Council area. **(2088 Scottish Government).**
- It is noted that cross boundary liaison is required to successfully implement Transport Proposal / Safeguards T16 and T21 in Table 9.The Council will continue to work with neighbouring authorities in the delivery of transport proposals that are on the boundary or that will be influenced by the cumulative impact of development in other regions. No modification proposed. **(2700 Midlothian Council)**
- No modification proposed, however the Council sees merit in part of this representation. It is acknowledged that the Transport Safeguard T6 Greendykes Public Transport has been constructed and it is no longer appropriate to safeguard it. It could be deleted from the Proposals Map. **(2700 Midlothian Council)**

Transport Proposals and Safeguards – West Edinburgh

- Support is noted. The phasing of each of the transport improvement proposals are set out in the LDP Action Programme. No modification proposed. **(2126-4 Cockburn Association)**
- A study on public transport improvements for the Newbridge Roundabout (Transport ProposalT12) is underway and includes capacity improvements to the A 89. The Council sees merit in these representations and considers it appropriate to amend the wording to include ‘and A89’ after ‘A8’. This would then address the cross boundary nature of the transport proposal. Appropriate factual corrections will be made to the next update of the Plan’s Action Programme. No modification proposed. **(0245 West Lothian Council; 2088 Scottish Government)**
- Table 9 is not intended to offer a detailed prescription for junction design or access arrangements for emergency vehicles. Emergency vehicle routes area a matter outwith the planning system. No modification proposed. **(1015 John Watson)**
- The details and phasing of the transport proposals can be updated as necessary to reflect the results of further transport assessments associated with planning applications in the LDP Action Programme. No modifications proposed. **(1159 New Ingliston Limited)**

- The transport interventions necessary to mitigate the impact, or cumulative impact, of new housing proposals have been identified through the Plan's Transport Appraisal. The specific proposals, and delivery programme, for the junction improvements will come forward as part of planning applications and as detailed information becomes available, this will be incorporated into annual iterations of the LDP Action Programme. No modification proposed. **(0225 Cramond & Barnton Community Council; 0360 Grahame Whitehead; 0651 M Allen; 1015 John Watson; 1986 East Craigs Wider Action Group)**
- The findings of the Plan's Transport Appraisal identified transport interventions that are required for the relevant junctions in the West Edinburgh Strategic Development Area. On considering its recommendations the Council in its Action Programme identified the Barnton Maybury Transport Contribution Zone (BMT CZ) which includes the three transport actions: Maybury Junction T17, Craigs Road Junction T18 and Barnton Junction T19. Any future development within the BMT CZ will be required to contribute towards theses transport action in line with Policy Del 1 Developer Contributions. It is therefore appropriate that HSG20 Cammo is referenced in the description of Transport Proposal T18 Craigs Road Junction. No modification proposed. **(0749 Cramond and Harthill Estate)**
- The timescales of transport proposals are set out in the Action Programme and may be subject to change as development proposals progress towards detailed permission and development programming becomes more certain. Phasing, if required, is more appropriately set in planning permissions. Therefore, it would not be appropriate to include a statement that infrastructure to be installed before development takes place. No modification proposed. **(1789 Corstorphine Old Parish Church)**
- The specific proposals for the junction improvements will come forward as part of planning applications and as detailed information becomes available, this will be incorporated into the Plan's Action Programme. No modification proposed. **(1955 Royal High School Parent Council)**
- The transport interventions necessary to mitigate the impact of new housing proposals have been identified through the Plan's Transport Appraisal. No modification proposed. **(0641 Cammo Residents Association)**

<u>Other Transport Proposals and Safeguards - Cycle and Pedestrian Routes</u>

- No modification proposed, however, the Council sees merit in this representation. It is acknowledged that the site of the safeguarded footpath/cycleway at 376 Gilmerton Road has been developed and the safeguard is no longer appropriate. It could be deleted in its entirety from the Proposals Map. **(2093 Aldi Stores Ltd)**
- The plan has included the appropriate interventions as suggested in the LDP Transport Appraisal. Further details of all the transport proposals will become available as assessments are made in conjunction with planning applications. It is therefore not appropriate to add specific requirements for pedestrian and cycle improvements to the junction improvements Transport Proposal T12, T13, T19 and T21. The requirement of the SESplan Action Programme 2013 states that Transport Scotland has commissioned a study (June 2013) to establish preference between flyover or underpass for Sheriffhall roundabout. With reference to Transport Proposal T13, the relevant study, carried out on behalf of the West Edinburgh development partners, identified improvements at the junction but did not identify provision for pedestrians and cyclists (eg green man/cycle stages) at the various arms. It identified the need to provide a safe route to effectively allow them to safely

bypass this junction on its north side (the tram depot side). This route will extend through the International Business Gateway site and provide a direct cycle route to the airport – and also rejoin the cycle route adjacent to the A8 further west. Appropriate provision has therefore been made for cycle routes. No modification proposed. **(2697 Scottish Natural Heritage)**

- The route along the River Almond crosses land that is safeguarded for Potential Additional Runway on the Proposals Map and Policy Emp 4. It would therefore be inappropriate to safeguard a path here. However, Figure 5 Green Network in Part 1 Section 2 of the Plan shows an indicative potential access along the River Almond from Turnhouse to Kirkliston. This is also identified in the Edinburgh Open Space Strategy (2010) as a potential green network action to upgrade the riverside route along the Almond. No modification proposed. **(0225 Cramond & Barnton Community Council; 0243 Friends of the River Almond Walkway)**
- The proposal to safeguard a cycle/footpath over a green bridge over Leith Walk has been the subject of a study commissioned by the Council with other partners (June 2014). Much of the route is on adopted road and therefore the scope of the plan to safeguard or deliver. The proposed elevated section includes roofs of unlisted properties outwith a conservation area which are therefore beyond the scope of the planning system to safeguard. The section of disused railway embankment and roofs of buildings within the conservation area which include the two abutments could be safeguarded. However, it is considered that this project would be expensive to deliver. An off-road route for cyclists using stairs and lifts for a short distance would not justify the costs. It is not considered that this would be a practical connection to the to the cycle network. No modification proposed. **(0432 Greener Leith; 2687 Leith Central Community Council; 1660 Adrian Graham)**
- It is not the role of the plan to show all cycle routes only those where land needs to be safeguarded from potential development that could prejudice the route. A commitment to improve a specific amount of cycle routes is a matter for the Council's Active Travel Action Plan (pages 18-26). Policy Tra 8 applies to other routes. No specific change to the Plan or Proposals Map was sought. No modification proposed. **(2116 Blacket Association)**
- Details of the type and suitability of the 'Family Network' routes for diverse mobility needs is only appropriate in the Active Travel Action Plan (pages 18-26). In addition, the provisions of the relevant equalities legislation will apply as appropriate to detailed projects for new routes regardless of what the Plan states. No modification proposed. **(2126-5 Cockburn Association)**
- The cycle/pedestrian link under the Newcraighall railway line is a Transport Action for Brunstane (HSG 29) in the Plan's Action Programme page 34. The Council acknowledges that the part of the route under the railway line has been infilled by Network Rail using their permitted development rights. However, this is potentially reversible and so it is appropriate to retain the safeguarded route running up to that point on either site. No modification proposed. **(0828 Network Rail)**
- The Albion Gardens to Powderhall cycle/footpath link, while currently in use as a rail freight route, is required to be safeguarded against development in the event that a) the current use as an active waste transfer station at Powderhall changes and b) the rail connection ceases to operate and becomes available for other purposes. In that event, the Council would seek to secure the route as a cycle/footpath to join the wider network. This would form a valuable connection to the cycle/footpath routes safeguarded at the Butterfly/Lochend and the existing cycle network in North Edinburgh. **(0828 Network Rail)**
- The Council has an aspiration to secure a new footbridge at Cramond over the

River Almond. However, there is no firm proposal or location for the crossing and therefore it is inappropriate to safeguard a crossing in the Plan. This on-going proposal is best progressed through the Council's Active Travel Plan. **(1739 South East Scotland Transport Partnership)**

Other Transport Proposals and Safeguards – Road and Public Transport

Road

- Under certain circumstances the Plan does show or safeguard some transport interventions, these are generally where there is a risk that the land in question might otherwise be developed in a way which prejudiced implementation of the transport scheme, and so there needs to be a planning policy which can be used to refuse any planning application for such a development and the transport project in question is a formally agreed future intention of the Council, particularly one which is a part of the Plan's strategy. The improvement or re-alignment of these roads is not currently such a transport project. Local upgrades to the road network are considered by the Council as Road Authority in line with the principles and priorities of the Council's Local Transport Strategy. The Second Proposed Plan also shows on it's Proposals Map some junction upgrades which have been identified in the LDP Action Programme. These are included because they have been identified through the Plan's Transport Appraisal as needed to support the new housing allocations. The improvement or re-alignment of these roads has not been identified in this way. No modification proposed. **(0743 Mark Sydenham; 0256 Hopetoun Estate Trust/Aithrie Estates/Hopetoun House Preservation Trust)**
- The Currie Bypass was a safeguard in the Rural West Edinburgh Local Plan. However, it is no longer appropriate or necessary in terms of the principles and priorities in the Local Transport Strategy nor is it justified by the Plan's Transport Appraisal Addendum. No modification proposed. **(1170 A.J.C. Clark)**
- The Plan's Transport Appraisal did not justify the lowering of the road under Newcraighall west bridge to accommodate double decker buses. There is no evidence that such an intervention requires land outwith the adopted road footprint and therefore it is not considered necessary to safeguard land in the plan for this. The Transport Appraisal Addendum p50 identified additional bus capacity would be required to service development at Newcraighall and Brunstane. The Plan sets out the on-site transport requirements in the Development Principles for the two Newcraighall Sites (HSG 26 and HSG 27) and the Brunstane site (HSG 29) including the safeguard of bus routes through from Milton Road East to Newcraighall Road and the Newcraighall to Queen Margaret University Campus bus link. It did not specify details of how to achieve this. However, more details will form part of future transport assessments associated with detailed planning applications for the sites. See also p.34 of the Plan's Action Programme which sets out the transport actions required. The creation of a bus-only road between the Jewel and Fort Kinnaird is more appropriately discussed within the context of the Local Transport Strategy. No modification proposed. **(2013 Transport for Edinburgh Ltd).**
- The nature of the upgrade to the Sheriffhall roundabout is a matter for the trunk road authority in the ongoing work for that project, as stated in the SDP Action Programme 2013. The Plan cannot add more details to the information on the proposal in advance of the finalisation and publication of these studies. No modification proposed. **(2126-6 Cockburn Association)**
- There are no firm proposals for the Park and Ride sites associated with the Orbital

Bus Route, nor timescales or costings. In the absence of these, or budget to acquire land, it is premature to identify tentative sites in this LDP. If firm proposals come forward they can be introduced in future annual iterations of the Plan's Action Programme. **(1739 South East Scotland Transport Partnership; 2126-6 Cockburn Association)**

- The detailed nature and route of the orbital bus route is not yet known, therefore the Plan cannot provide more information on potential environmental impacts. Any firm proposals that come forward for approval will require Environmental Impact Assessment at that time. The general purpose for the transport safeguard on the disused railway between Straiton and Danderhall has been assessed in the Plan's Strategic Environmental Assessment. Further details of this project will be updated in the Plan's Action Programme as information becomes available as and when appropriate. No modification proposed. **(2126-7 Cockburn Association)**

Rail

- Transport Proposal T4 Rail Halts on the south suburban rail line are safeguards not proposals like to come forward as proposals in the Plan period. Reference to the viability of the project is justified to explain its current status. This Plan provision has been informed by input from Transport Scotland, not rail operators. Likewise, the omission to safeguarding the track reflects input from Transport Scotland, which confirms that there is no real need to safeguard operational and essential infrastructure. No modification proposed. **(1964 Grange Association; 2354 Grange/Prestonfield Community Council)**
- A specific high speed rail route into the city centre would be for the National Planning Framework and /or the regional transport strategy to identify. At present there are no details of the project sufficient to have a land use implication, and therefore there is no land that is required to be safeguarded in this Plan. No modification proposed. **(1739 South East Scotland Transport Partnership)**
- The rail line at Abbeyhill is safeguarded as part of the operational requirements for the Edinburgh Glasgow Improvement Project. It is not intended to open this as a potential future rail station, and it would therefore be inappropriate to identify it as a rail halt safeguard in the way that the plan identifies rail halts on the south suburban line. No modification proposed. **(2126-8 Cockburn Association)**

Tram

- It is outwith the scope of the Plan to comment on retrofitting the tram lines or adding details regarding the tram project which have no land use implications. No modification proposed. **(2126-9 Cockburn Association)**
- The principle of the tram project is outwith the scope of the Plan. The Council is committed to safeguarding the route of all the proposed tram phases; the Plan identifies the indicative route and safeguards them against any development that could prejudice their delivery. No modification proposed. **(0360 Grahame Whitehead)**
- The tram route safeguard from Granton and Leith is indicative. Development proposals in the proximity of the indicative route are assessed in terms of Policy Tra 7 with reference to the more detailed tram route designs as appropriate. No modification proposed. **(2517 Britannia Quay Proprietors Association; 2173 K J Wilson)**
- No proposed modification, however, the Council sees merit in this representation. It

is acknowledged that the wording regarding the first phase of the tram line requires updating to state that is now operational. **(2697 Scottish Natural Heritage)**

RESOURCES AND SERVICES PROPOSALS

- No modification sought other than to seek clarification on the Council's waste management strategy. This is outwith the scope of the plan. The Zero Waste Plan is the primary reference on this matter. No modification proposed. **(1170 A.J.C. Clark)**
- It is outwith the scope of the Plan and planning system to include details on the composting process. Waste management processes are licensed separately and regulated by Scottish Environment Protection Agency. No modification proposed. **(2126-10 Cockburn Association)**
- The phasing of development, and the infrastructure and services to support new development, will depend on each site. Telecommunications providers enjoy extensive statutory rights which place them beyond the control of the planning system. No modification proposed. **(2126-11 Cockburn Association)**
- No modification proposed, however, the Council sees merit in this representation. Craigiehall Quarry has planning permission for the infilling of the site with inert material and composting material. As an operational quarry it is appropriate to identify Craigiehall Quarry in Figure 10. **(2480 Rosebery Estates Partnership)**

Reporter's conclusions:

TRANSPORT PROPOSALS AND SAFEGUARDS

Cross references

1. The transport proposals in Table 9 are closely related to the development proposals in the local development plan, and my conclusions within this issue are therefore cross-referenced as appropriate to and within other issues examined in the local development plan. This is particularly relevant to the strategic development areas addressed in Issue 20, and other issues relating to specific development sites (mainly proposed housing sites) both within and outwith the strategic development areas.

General

2. Opportunities for bus priority are an important part of the council's transport strategy which includes the promotion of (and gives priority to) sustainable modes of transport. This transport strategy is explained in paragraphs 81 to 86 of the proposed plan, and paragraph 83 specifically refers to public transport improvements including bus priority measures on main roads. The proposals in Table 9 are transport proposals which have direct land use implications, and the policies in Section 7 then address the relationship between development and sustainable transport. Bus priority measures in general terms constitute transport management and are more appropriately addressed in the council's local transport strategy, although where there are direct links to a specific transport proposal (such as the proposed Sheriffhall junction upgrade), a reference to the incorporation of bus priority is included in the proposal. It is therefore neither appropriate nor necessary to refer to specific bus priority measures within paragraph 83.

3. Any requirement to divert traffic onto the existing Forth Road Bridge if the new bridge

becomes congested would be a transport measure for which Transport Scotland is responsible. The monitoring of the Forth Road Bridge Crossings is not a matter for the local development plan, and does not need to be specifically referred to.

4. I note the proposal to link the proposed slip roads from the B800 onto the M9 spur, which is part of the public transport strategy associated with the Forth Road Bridge, and that the council sees merit in referring to this in paragraph 84. However, this is not considered to be of sufficient importance in the context of the local development plan to justify the inclusion of a specific proposal in Table 9, or the proposals map. I consider that this is another matter which is already sufficiently addressed elsewhere, and would not add materially to the last sentence of paragraph 84, which emphasises the future role of the existing bridge in the context of providing for sustainable forms of transport.

5. Where an improvement to public transport infrastructure is required in relation to a specific development proposal, it should ideally be implemented for use when the development becomes operational. This is however dependent upon the circumstances of the particular development proposal, and I do not consider that a general statement (even qualified by wherever possible) stating that public transport infrastructure will be installed before development takes place is justified within paragraph 86.

6. However, I recognise that public transport infrastructure should be developed timeously where this is required in connection with the proposed new housing sites, or other development, and that this should be referenced appropriately within the local development plan. This matter is further examined below in the context of a policy approach to addressing cumulative impact and cross boundary issues, and is also addressed in Issue 21, where it is recommended that Policy Del 1 states that development should only progress subject to sufficient infrastructure (which includes public transport infrastructure) already being available or where it is demonstrated that it can be delivered at the appropriate time.

7. I have noted the concern expressed in representations with respect to the link between development and a sufficient transport network, and particularly in South West Edinburgh. This matter is addressed within my findings below (and other issues relating to specific development sites), where the effect of development outwith the strategic development areas is also taken into account.

Cumulative impact and cross boundary issues

8. Paragraph 274 of Scottish Planning Policy requires planning authorities to appraise the impact of the spatial strategy and its reasonable alternatives on the transport network, in line with Transport Scotland guidance. This should include consideration of previously allocated sites, transport opportunities and constraints, current capacity and committed improvements to the transport network. Planning authorities should ensure that a transport appraisal is undertaken at a scale and level of detail proportionate to the nature of the issues and proposals being considered, including funding requirements. Appraisals should be carried out in time to inform the spatial strategy and the strategic environmental assessment. Where there are potential issues for the strategic transport network, the appraisal should be discussed with Transport Scotland at the earliest opportunity.

9. Policy 8 of SESplan states that the local planning authorities in collaboration with Transport Scotland and SEStran will support and promote the development of a

sustainable transport network. Local Development Plans will (amongst other things primarily aimed at promoting sustainable forms of transport) take account of the cross boundary transport implications of all policies and proposals including implications for the transport network outwith the SESplan area. This criterion was added to Policy 8 following the examination of the plan.

10. Policy 9 of SESplan states that Local Development Plans will (amongst other things) provide policy guidance that will require sufficient infrastructure to be available, or its provision to be committed, before development can proceed, and pursue the delivery of infrastructure through developer contributions, funding from infrastructure providers or other appropriate means. This policy relates the identification of the necessary transport infrastructure and its timely delivery. The programming of infrastructure is further examined below and in relation to developer contributions under Issue 21.

11. Although the representations under this issue primarily concern cross boundary issues, Transport Scotland has expressed concern about cumulative impact on the trunk road network generally. There are also a significant number of representations from communities and local residents throughout Edinburgh expressing concern about the transport implications for the road network as a whole which would result from the major development sites (particularly for housing development) allocated in the proposed local development plan. Communities and local residents are concerned about existing congestion, which they say would be significantly increased by the expected cumulative additional traffic flow, and which is not considered to be sufficiently mitigated by the transport proposals in the plan, or by the development principles relating to individual allocated housing sites.

12. Increased congestion is not considered by Transport Scotland to be just a matter of inconvenience, but may raise road safety concerns where congestion is so extensive that lengthy traffic queues form which extend along slip roads at junctions into main road carriageways. Whilst transport concerns are examined under the relevant site specific issues, I consider that it is necessary to examine the overall cumulative effect of development on the trunk and local road network (including cross boundary issues), and set out broad conclusions and recommendations to the council under this issue, to ensure that the local development plan is sufficient and appropriate in the context of Policies 8 and 9 of SESplan referred to above.

13. Transport Scotland expressed concern at the hearing held to examine infrastructure and housing land delivery that the cumulative impact from the proposed new housing development in the plan has not been fully assessed within the transport appraisal, and that the effect from housing development outwith the City of Edinburgh has not been taken into account at all. Transport Scotland has therefore stated that it is unable to support the proposed plan, because of the insufficient assessment of the cumulative effects of development on the trunk road network (both within and outwith the City of Edinburgh). This means that it is not possible to fully set out the proposals for improvements to the trunk road network which may be required in the local development plan. In this context Transport Scotland considers that the proposed plan should refer to the outcomes of the cross boundary study, require developer contributions for strategic as well as local transport infrastructure, and specifically refer to such infrastructure.

14. The concerns within the representations under this issue specifically refer to the cumulative effect of development in the proposed plan with development in neighbouring planning authority areas. For the City of Edinburgh, which is the regional core, I find that

this principally relates to authorities within the SESplan area, and in particular, East Lothian, Midlothian and West Lothian. These cross boundary issues have been identified within SESplan as a matter for the subsequent local development plans to take into account in the context of the strategic development plan. I accept however that it is not possible for the constituent authorities to address these cross boundary issues in isolation. I note that a more detailed study is now ongoing through the cross boundary Cumulative Impact Transport and Land Use Appraisal Working Group. This strategic study is led by Transport Scotland and includes the constituent authorities, and a particular focus appears to be the effect on the trunk road network. However, the working group has still to complete the study. In the absence of the conclusions of the study, I share the concerns of Transport Scotland to the extent that there is limited evidence on which to determine whether or not the plan sufficiently addresses the requirements of SESplan Policy 8.

15. The local development plan includes major proposals for development within the strategic development areas. The majority of these are housing development sites, or mixed use development sites including housing. There are in addition other significant development proposals (mainly housing) outwith the strategic development areas. A transport appraisal (volume 1 and volume 2) dated March 2013 (together with an addendum dated June 2014 relating to additional sites in the second proposed plan) supports these development proposals. It includes assessment of the impact of the new housing development allocated in the proposed plan, and the transport interventions considered necessary (which are set out in Table 9 of the proposed plan or in the development principles for the individual sites).

16. The transport appraisal establishes the location of the proposed development and estimates the likely increase in traffic flow resulting from the development within road corridors and for specific roads within the city. Modal share increase with respect to public transport improvements has been taken into account. Transport interventions have been developed and assessed with respect to the proposed increase in traffic flow. This has taken some account of the cumulative effect of development, but Transport Scotland questions the sufficiency of this, indicating that it does not fully comply with the guidance issued to planning authorities with respect to transport appraisals. The council has indeed acknowledged that further work is required with respect to the design of the transport interventions indentified in the plan.

17. The transport appraisal does not take into account the effect of development outwith the City of Edinburgh, and for example I consider that taking into account significant housing allocations close to the A720 within East Lothian and Midlothian is an important part of the equation in assessing cross boundary impacts on the trunk road network, and is required in the context of SESplan Policy 8. The council has referred to allowances for wider growth being taken into account in the transport appraisal. This is assessed on pages 18 and 19 of the transport appraisal (volume 1), and in Table 2-6 for the period of the plan (to 2025) a 10% increase has been assumed for trunk roads, and 2% for local roads. However, these growth allowances are not sufficient on their own because they do not take into account the impact of specific development on parts or junctions of key trunk roads (and other roads) such as the A720.

18. In my view, the cumulative effect of development proposals within and outwith the City of Edinburgh on the transport network (both trunk and local) has not yet been sufficiently addressed in the local development plan. I recognise that the council has had limited information to work with in this context, and that it considers that the

assumptions made are appropriate to the level of strategic appraisal being applied. However, this does not alter the fact that that the local development plan is required by SESplan Policies 8 and 9 to take cumulative impact, including cross boundary effects, into account. Transport Scotland considers that a more comprehensive appraisal in accordance with its guidelines should be undertaken with respect to the major development sites in the local development plan. Part of this is being addressed by the cross boundary study, but more assessment specifically relating to the cumulative impact of the proposed housing sites in the plan is considered to be necessary.

19. Although I recognise that the public transport proposals in the plan would increase the modal shift towards more sustainable forms of transport (as set out in the transport appraisal), there would be significant effects on the trunk and local road network arising from the development proposed in the plan which have not yet been fully addressed in the plan. Whilst the concern of Transport Scotland particularly relates to the trunk road network, I find that cumulative effects equally apply to the local road network. In overall terms, I find that the proposed plan is not consistent with Policies 8 and 9 of SESplan, because it does not sufficiently take account of cross boundary implications, nor does it provide policy guidance that will require sufficient infrastructure to be available, or its provision to be committed, before development can proceed.

20. Housing constitutes the most significant element of the new development proposals. Notwithstanding the difficulties relating to the trunk and local road network referred to above, the local development plan has to provide land for housing to meet the identified housing requirement. This is set out in Supplementary Guidance which has now been approved by the constituent authorities for the SESplan area. This is examined in Issue 5, and I refer to the findings there. SESplan identifies 13 strategic development areas within the city region, 4 of these being within the City of Edinburgh. Figure 1 illustrates the spatial strategy, showing 4 strategic development areas within the City of Edinburgh, which is described as the regional core. The main focus for future growth (and therefore development) is within these strategic development areas, but growth is not restricted within the local development plan to these areas, with for example significant housing now being allocated in South Queensferry.

21. Following on from the above, there is no evidence from the submissions of Transport Scotland or other parties that in general terms mitigation of the impact from proposed housing sites on the trunk or local road network is not feasible, and that such housing development as proposed in the plan should not proceed. The concern is primarily that it has not been demonstrated that the transport interventions set out in the plan (through Table 9 or in the development principles for specific sites) are sufficient. It was agreed at the hearing that this matter could be sufficiently addressed through an appropriate policy (if necessary referring to appropriate Supplementary Guidance).

22. However, the programming of housing sites is also an important consideration in this context. The council has stated that although new transport infrastructure is required to accommodate the increased traffic flow resulting from the allocation of additional housing sites, none of this additional housing would be restricted until the implementation of the relevant transport infrastructure has been completed. I find that it is therefore essential for the local development plan to provide sufficiently for the necessary improvements to the transport infrastructure, and their timely implementation within the plan period.

23. Table 9 of the local development plan includes key transport interventions which

have been identified through the appraisal of the existing transport network and development proposals. Additional transport interventions are referred to within the development principles and site briefs. On a point of clarification, the council indicated at the hearing that transport proposals are included for major projects and/or where there is a requirement to safeguard land, and transport interventions in the site development briefs are considered to be more detailed requirements which inform the masterplan process for development. I find that this should be clarified in the text of the proposed plan, and I provide appropriate wording for this in the recommendations below. This distinction should however be borne in mind when considering the implications arising from either type of transport intervention.

24. In this context, I consider that it is necessary for the local development plan to set out the known (including potential) transport interventions as accurately as possible, but at the same time set out a further process which ensures that the cumulative (including cross boundary) impact of development on the transport network is fully addressed. Whilst it would not be appropriate to include actual timescales for delivery in the plan, I also consider that the plan should clarify that development should only progress when sufficient infrastructure is available or can be delivered at the appropriate time. This should be through Policy Del 1. The actual approach to delivery and timing would then fall to be addressed through Supplementary Guidance and within annual review and monitoring through the action programme. This is a particular issue where delivery of the required infrastructure results from the cumulative impact of more than one site. This is addressed within Issue 21, and I refer to the conclusions there.

25. The cumulative impact with other sites is considered to be critical to the delivery of infrastructure. It is therefore also recommended through Issue 21 that general development principles are included within Part 1 Section 5 of the plan in order to address the infrastructure requirements within the areas which are to become the focus of most future development; these being West Edinburgh, South East Edinburgh, South West Edinburgh and South Queensferry. Matters relating to the Edinburgh Waterfront are addressed separately. These general development principles would be followed by the specific development principles for each site.

26. Furthermore, additional text should be added to proposals in Table 9 or the development principles and site briefs where necessary. Where transport interventions may need to take account of cumulative or cross boundary issues not yet quantified, this should be referred to as appropriate. As well as the consideration given to this matter in Issue 21, development principles and site briefs are considered separately with respect to individual development proposals within the relevant issues. However, some specific transport interventions within Table 9 are referred to in representations under this issue and these are considered below, either under this heading or under headings for West Edinburgh and roads in other areas.

27. The action programme sets out the detail and timing of transport interventions (on their own or related to specific development proposals) where this is known, and this will be updated regularly as (although directly related) the action programme is not part of the local development plan. Whilst some transport interventions, particularly in relation to the A720, may assist with addressing cross boundary development issues, they have not been fully identified in this context, and the actual design of improvements to roads and junctions may need to be revised in due course. Additional transport interventions may be required as a result of the overall impact of development proposals within the city region as a whole.

A policy approach to addressing cumulative impact and cross boundary issues

28. Notwithstanding any specific modifications to the proposals listed in Table 9 or the development principles and site briefs for development which may be necessary following this examination, I find that the principle of undertaking a further assessment of cumulative impact and addressing the cross boundary implications of all the development sites allocated in the local development plan, where this is uncertain at the present time, should be established through a new policy (and supporting paragraphs) in the local development plan. The new policy should require all development proposals to fully address transport impact, including the cumulative and cross boundary impact of the development where appropriate, and then to address the required infrastructure in Table 9 and (for sites allocated in the local development plan) in the development principles for the sites concerned. However, the new policy should cover all development proposals whether or not they are allocated in the local development plan. For housing development, revised Policies Hou 1 and Del 1, together with the recommended new transport policy, would then provide an appropriate framework for all housing development proposals to be assessed.

29. Supplementary Guidance is recommended through Policy Del 1, specifically in relation to the approach to developer contributions required for the delivery of the necessary transport interventions, and this should also be referred to in the policy. In this context, it is important to include an appropriate reference in the plan to all known (including potential) transport interventions, in order to provide the necessary hook to ensure that the Supplementary Guidance provides the necessary context for delivery, to assist in addressing the inconsistency in the plan (in the context of Policies 8 and 9 of SESplan) referred to above. Transport Scotland has identified particular potential transport interventions that should be included in the plan, in addition to those currently included. These interventions (where they relate to housing sites) are now recommended for inclusion in the general development principles for the relevant areas of West, South East and South West Edinburgh and South Queensferry.

30. A more comprehensive transport assessment in line with that envisaged by Transport Scotland may have identified more detailed and additional transport interventions, but this information is not available, and it is only possible for the proposed plan to identify the potential scope of mitigation drawing on the evidence available to the examination. Following on from this, the recommended policies (including the new transport policy) and development principles would provide a framework for the allocated sites and for new sites to come forward, whilst ensuring the necessary assessment of and any appropriate improvements to the transport infrastructure. At the next review of the local development plan, there would be an opportunity to re-assess this approach.

31. I recognise that there is evidence before this examination with respect to some housing development sites to the effect that, through the development management process, detailed transport assessments have been undertaken which indicate that no further improvements are required to the trunk or local road network. Where appropriate this is addressed under the relevant site specific issue in order to determine the appropriate text for any related proposal in Table 9 or the development principles and site briefs. In any event, the additional policy and associated development principles being recommended simply sets the context for the development management process, further assessment and any appropriate master planning. If specific interventions are referred to in the plan, it then becomes incumbent upon the developer to provide the evidence which would demonstrate the sufficiency of the proposed scheme in the

context of these considerations. This provides greater clarity about the parameters for further assessment and surety that the necessary mitigation is fully addressed.

Suggested additional sites for inclusion in the local development plan

32. Whilst the recommended new policy would require all development proposals to fully address transport impact, including the cumulative and cross boundary impact of the development, there is a further issue relating to the allocation of additional strategic housing sites in the local development plan. Following the hearing, Transport Scotland appears to be content that the transport implications from existing allocated housing sites would be sufficiently addressed by additional development principles where appropriate, and the recommended new policy. However, additional housing allocations would add yet further traffic to the trunk and local road network.

33. In considering further housing allocations, particularly potential strategic housing allocations within the IBG (Issue 20) and East of Millburn Tower (Issue 14) in West Edinburgh, and also additional sites in South East Edinburgh (which would be smaller but more numerous so the cumulative impact would be significant), the reporters decided that it was necessary to seek further information from various parties on the appropriateness of including such sites within the local development plan through the examination. This was for a range of reasons including the potential transport impact.

34. Following the further information request, the Planning and Architecture Division of the Scottish Government has expressed further concern on behalf of Transport Scotland about making provision in the local development plan for substantial additional housing, which has not been the subject of any transport appraisal relating to the proposed plan. The response states: “adding sites would further compound the issue that the council has not sufficiently identified the potential impact or suitable mitigation measures for the sites already included in the local development plan”. It is further stated: “at this stage it is not possible to accurately identify the cumulate impact of the development sites either. Undertaking a proportionate and robust transport appraisal of a development plan is outlined within Scottish Planning Policy and, to date, the council has not satisfactorily undertaken this. The addition of sites will only add to the scale of issues experienced on the network within and around Edinburgh with no suitable appraisal of the potential impact or deliverable mitigation measures identified”.

35. It is also stated: “the council assumes in its housing site assessment that, in relation to infrastructure “any enhancements are technically feasible”, as there is a lack of information on area specific infrastructure and a limitation in modelling the sites. We have several issues with this approach, the most concerning aspect being the assumption of feasibility which is not supported by appraisal to clearly identify the necessity for the improvements in the first place, their deliverability and any work to identify how they may be funded”. The council in its response accepts that whilst it may be possible to address additional impacts through its action programme in a similar manner to other sites in the plan, further appraisal could suggest a more significant scope of interventions than is currently required to enable the development strategy.

36. This matter is addressed within the relevant site specific issues, but it is important to emphasise here that any contribution of such sites to the shortfall in the programmed housing land supply has to be balanced against recognised uncertainty about the transport implications arising from these potential additional housing sites. In addition the ongoing cross boundary impact study may identify further mitigation requirements

but this would only be based on development which is currently anticipated to come forward as included in the proposed plan.

Appropriate modifications to the proposed plan

37. Following on from all of the above, I conclude that the proposed plan as it stands is not consistent with Policies 8 and 9 of SESplan with respect to the provision of appropriate transport infrastructure to mitigate the impact of new housing development. In order to address this matter appropriately in the local development plan, I therefore also conclude that:

- additional text should be incorporated into the proposals in Table 9, into the general development principles within particular strategic development (and other) areas, and into the development principles relating to individual sites to clarify the scope of potential interventions and the need for further assessment; and that:

- a new policy should require development proposals to fully address transport impact, including the cumulative and cross boundary impact of the development where appropriate, the required infrastructure in Table 9, the area specific general development principles and (for sites allocated in the local development plan) the development principles for the site concerned. This should take into account the Supplementary Guidance proposed through Policy Del 1.

Conclusions relating to specific transport proposals under this heading

38. With respect to the Newbridge roundabout (T12) in West Edinburgh, I consider the issues raised on behalf of the Scottish Government and West Lothian Council under the transport interventions for West Edinburgh below. With respect to the proposed link between the Wisp and Newcraighall Road (T16) and the improvements to the Burdiehouse junction (T21), in South East Edinburgh, I recognise that the council will continue to work with neighbouring authorities in assessing the cross boundary implications of the transport proposals listed in Table 9. I would also mention that through the recommendations in Issue 21, the above interventions, together with those for the Sheriffhall and Straiton junctions on the A720 in South East Edinburgh, are included in the general development principles.

39. Taking into account the interest expressed on behalf of Midlothian Council, it is appropriate that the final design of these proposals should consider the transport implications of development proposals within the Midlothian Council area. With respect to the latter in particular, housing proposals in the Midlothian Council area may also be a relevant matter for consideration in the design of the proposed junction improvement. However, the proposed new policy recommended below clearly embraces development within the Midlothian Council area, and I therefore find that there is no requirement for any further modifications relating to these representations.

40. With respect to the improvement to the Greendykes Public Transport Link (Proposal T6), I find that since this proposal has now been implemented it should be removed from the list of proposals in Table 9 and the proposals map, as there is no longer a need to safeguard the land required for the implementation of this link. The deletion of Proposal T6 is included in my recommendations below.

Transport Proposals and Safeguards – West Edinburgh

41. I note the support expressed within the representations for transport proposals T9 to T21. The view is also expressed that T13 and T17 (not T14 as stated within the council's summary above) should be considered as the same project because of their close proximity and the amount of traffic between them. However, I do not consider that it is the role of the local development plan to provide detailed information relating to the implementation of projects (beyond that which has already been examined above), including the relationship between projects. These are matters for the action programme which (apart from any implications this may have on the sufficiency or appropriateness of the provisions of the local development plan) is not a matter for this examination.

42. With respect to the Newbridge Roundabout, I find that since the proposed capacity improvements are not limited to the M9 and A8 approaches, the wording suggested on behalf of Scottish Government would better reflect the aims of the proposed roundabout improvement. Whilst I recognise that the design of the proposed improvements to the roundabout should take into account the cumulative effect of development proposals within the SESplan area, I find that this is sufficiently covered by the proposed new policy recommended below, and that no modification is required in this context.

43. The representations relating to the International Business Gateway are further examined within Issue 20, but these representations also raise specific matters relevant to the implementation of transport proposals T9 to T13. However, I find that there is nothing within the representations that requires any modification to the details of the transport proposals as listed within Table 9, as they are all matters which will be addressed in the detailed design of the proposals in the context of the proposed new policy and the development principles. With respect to Proposal T10, it is stated that the link through the International Business Gateway may be only for public transport, but this is clearly just an option for consideration. The proposed new junction which would result through Proposal T11 is stated to be intended to support the development of the Royal Highland Centre. Any funding through developer contributions would depend on the eventual purpose of the junction, and there is no need for any prescription about this beyond the content of Policy Del 1.

44. Otherwise, the representations are essentially supporting the need for detailed studies which will determine the nature and design of these transport interventions. The action programme will be updated as appropriate to reflect the outcome of these studies, and may provide a summary of the key design considerations as well as a timescale for their delivery within the plan period. I note the representations relating specifically to the action programme as it stands, but these are not a matter for this examination. It will not be necessary to update the local development plan to take account of the outcome of the detailed studies, which will be reflected in masterplans and addressed through the development management process in the context of the recommended new policy.

45. Several representations refer to the proposals for improvements to the Maybury, Craigs Road and Barnton junctions, which as well as improving the existing traffic flow are intended to provide for the increased traffic generation resulting from the proposed housing developments at Maybury and Cammo, Proposals HSG 19 and HSG 20. These proposed housing sites are examined in Issue 7, but under this issue some of the representations state that the proposed improvements to these junctions will not be sufficient. It is considered that improvements are already required to alleviate existing traffic congestion and should not be delayed until new housing development takes place.

It is suggested that Proposals T17 to T19 require more substantial measures, including the possibility of alternative access points to the proposed housing developments.

46. However, a representation on behalf of the prospective developer seeks the removal of all references in the plan to the effect that the Craigs Road junction improvement is required to mitigate the impact of the new housing development at Cammo, because this junction was not included within the scope of the transport assessment undertaken for that development.

47. I have reviewed the transport appraisal relating to Proposals HSG 19 and HSG 20 which identifies improvements to the above 3 junctions as necessary transport interventions. There is evidence that all of the transport corridors, including the A8, experience congestion already at peak periods. However, the measures set out in Table 9 take account of the proposed new housing developments, and I refer to the findings in Issue 7 on this matter, to the effect that there is no evidence to demonstrate that the proposed interventions would be insufficient, subject to addressing any identified impacts on the safe operation of the local road network. However, in the context of the representation from the prospective developer relating to Cammo, a minor change is recommended with respect to the Craigs Road junction (T18) through Issue 7.

48. I acknowledge that significant work is still required in order to finalise the nature and design of the proposed junction improvements, and that this would be incorporated into updates to the action programme in due course. This would include measures for pedestrian safety at the Barnton junction, including schools. However, I find that this should be considered through the development management process in the context of the recommended new policy. With respect to the representation seeking a requirement that Turnhouse Road be kept open for emergency vehicles, I find that this is also a matter for the subsequent design of the junction improvement, to be addressed through the development management process as appropriate.

49. In overall terms, I conclude that apart from the required change (essentially for clarification) to the proposal for the Newbridge roundabout in Table 9 (Proposal T12), and the recommended minor change (through Issue 7) relating to the Craigs Road junction (Proposal T18), no modifications are required with respect to these representations relating to the transport proposals and safeguards in West Edinburgh.

<u>Other Transport Proposals and Safeguards – Cycle and Pedestrian Routes</u>

50. With respect to the proposed cycleway/footpath safeguarded under Proposal T8 at Gilmerton Road, I note that planning permission has been granted for a supermarket (at the time the representation was lodged being under construction) which would prevent the implementation of the cycleway/footpath as indicated on the proposals map. Since the site has now been developed, the council considers that this safeguard is no longer appropriate, and I therefore find that it should be deleted from the proposals map.

51. Proposals T9 to T21 are improvements to the transport network to increase road capacity and access. Proposals T9, T10, T15 and T16 relate to new road proposals, but all the others are junction improvements. One is an additional junction on the A8 and the others constitute improvements to existing junctions to provide grade separation or increase capacity through additional or widened carriageways, enhanced lane capacity, traffic light improvements, new accesses and bus priority. Three of the junction improvements, proposals T14, T17 and T18 refer specifically to improvements for

pedestrian and cycle safety or access.

52. Scottish Natural Heritage seeks to ensure that active travel is built into all such junction improvements, specifically referring to Proposals T12, T13, T19 and T21. Proposal T13 appears to be of particular concern as it is suggested for this junction improvement (given the degree of change planned for the West Edinburgh area) that the integration of active travel routes is included within the design process for the proposal. In my view it is inevitably the case that the most appropriate provision for pedestrians and cyclists will be incorporated into the design of all of the junction improvements, and it would appear that Proposals T14, T17 and T18 have a particular requirement for this.

53. I note that the junctions where pedestrian and cycle improvements are referred to in the proposals follow the recommendations in the transport appraisal. Since nothing specific has been identified for the remaining junctions, I find that it would not be appropriate to add requirements for pedestrian and cycle improvements, because there would be insufficient evidence to justify this. I also find that specific arrangements for pedestrians and cyclists are likely to be more a management issue than a principle element of junction design, and as such (whilst it may be appropriate to refer to such in the action programme) it is unlikely to be a significant matter for inclusion in the plan. Furthermore, there is specific provision for the consideration of pedestrian and cycle routes in the West Edinburgh area under Proposals T9 and T10. I therefore find that no modification of the local development plan is required in this respect.

54. With respect to the proposed footpath/cycleway along the River Almond from Cramond Brig to Kirkliston, I have reviewed the consultation paper (2014) prepared by the Friends of the River Almond Walkway, which explains the benefits of and options for such a route being provided. I also note that figure 5 of the green network shows an indicative access along the river Almond from Turnhouse to Kirkliston, and that the Edinburgh Open Space Strategy identifies a potential upgrade to this riverside route. In addition, the core paths plan shows this as a potential core path extension. I therefore find that the aims of the consultation paper are commendable and I agree that such a footpath/cycleway would in general terms be consistent with key policies in the local development plan.

55. However, it appears to me that there are many areas that would require examination and negotiation with landowners and other interested parties, and the implementation of the project is likely to extend beyond the plan period, and at least the first 5 years. I consider that the feasibility of the project has yet to be determined. I also note that this potential extension runs through land which is safeguarded on the proposals map and under Policy Emp 4 for a potential additional runway at Edinburgh Airport. I find that safeguarding the land for both would represent a potential conflict and would therefore be inappropriate at this time.

56. On balance, whilst there is clearly potential for this project to proceed, I find that there is sufficient recognition of the potential within the local development plan without its inclusion within Proposal T8, which at the present time I find would be premature for the reasons stated above. I therefore do not consider that it would be appropriate to include this proposed footpath/cycleway extension within Proposal T8 of the local development plan. However, I find this matter should be further examined at the next review of the local development plan, in the context of progress made on the outstanding matters which need to be addressed in determining the feasibility of the project.

57. The proposed footpath/cycleway within Leith from the Water of Leith at West Bowling Street to Thorntree Street has already been the subject of a study commissioned by the council with other partners. However, I note that the council considers the project would be expensive to deliver, and there is no evidence relating to the feasibility or delivery of such a project within the plan period. It would not therefore in the circumstances be appropriate to safeguard a route for this proposed footpath/ cycleway on the proposals map under Proposal T8.

58. I note the council's statement that the Active Travel Action Plan (on pages 18 to 24) provides a commitment to improve cycle routes. The plan indicates a list of routes for early completion within a family network of cycle routes. In addition, a map within the plan shows the routes for completion up to 2020. There would be no purpose in repeating all of this information within the local development plan, its primary purpose being to set out policies for sustainable transport, including cycling, and key land use proposals for cycling routes where land requires to be safeguarded for such, the latter being included within Proposal T8. The council's core paths plan also includes appropriate routes suitable for cycling.

59. I have noted that there is reference to limited mobility needs within Policy Des 7 which in criterion 7 refers to the particular needs of people with limited mobility in the design of development proposals. However, limited mobility is a specific issue relating to proposals for active travel. I recognise that the provisions of the relevant equalities legislation will apply to detailed projects, and that this would require to be taken into account in carrying forward specific proposals for additional cycle paths and footpaths. However, I find that there should be a reference to providing for people with limited mobility needs in the context of active travel. I do not consider that it is necessary to include anything within Proposal T8 itself, but a reference to such should be incorporated into paragraph 85. I include this within my recommendations below.

60. An under bridge on the proposed cycle/footpath route at Newcraighall Road has been infilled. However, I agree with the council that this in itself does not prevent the route from being established. Such infilling could be removed or an alternative link provided. There is therefore no requirement to delete this route from proposal T8. In addition, a route for a cycle path/footpath from Albion Gardens to Powderhall is safeguarded under Proposal T8. This is currently in use as freight rail route, and its inclusion in the plan has been queried by Network Rail. I therefore sought further information on the matter.

61. The council has indicated that this project is identified as long term in the council's Active Travel Plan (2011), where it is shown on the map for implementation by 2020, which is within the plan period. The council has provided a more detailed plan showing the proposed safeguarded route. Currently the railway line is used to serve the council's waste transfer facility at Powderhall, but this is due to cease in the first few years of the plan, and therefore the council expects to secure the route as cycle/footpath to join the wider network. The council would work with partners to acquire the line from Network Rail and redevelop it into a cycling and walking route, and from the information provided relating to the council's experience in funding such projects, I am convinced that the project is deliverable within the plan period. I therefore find that this route should be retained within Proposal T8.

62. I note the council has an aspiration for a new footbridge over the River Almond at Cramond, but that there is no firm proposal or location for the crossing. It would

therefore be inappropriate at this time to include provision for this on the proposals map under Proposal T8.

63. In overall terms, I conclude that the proposed cycleway/footpath at Gilmerton Road under Proposal T8 should be deleted from the proposals map, and that paragraph 85 of the plan should include the need to provide for people with limited mobility. Otherwise, no modifications are required with respect to these representations relating to cycle and pedestrian routes.

Other Transport Proposals and Safeguards – Road and Public Transport

Road

64. Granton Harbour is part of the redevelopment of the Edinburgh Waterfront, and Proposal EW 2c provides housing led mixed use development, some of which has already been completed as part of the approved masterplan. I note that there is a proposal for the realignment of Lower Granton Road as part of a Section 75 planning obligation between the council and Forth Ports Ltd related to this development. I also note the evidence that there is a need to upgrade a temporary haul road from Echline Road to Shore Road, particularly in view of the allocations for residential and commercial development in the area, and allowing for further development of recreational facilities in Port Edgar. There are therefore consequences for the local road network, including Lower Granton Road, taking into account the generation of additional traffic from the proposed housing and commercial development in the waterfront area.

65. I note the council's reasoning as to why road improvements in relation to Granton Harbour should not be included as specific proposals in Table 9, but rather should be considered by the council (in relation to development proposals) as roads authority in line with the principles and priorities of the local transport strategy. It is clearly a matter of degree as to whether or not additional road or junction improvements are of a sufficient scale (and require land to be safeguarded) in order to justify being included as proposals in Table 9. Proposal EW 2c is part of wider proposals for the redevelopment of the Edinburgh Waterfront within one of four strategic development areas in the city, and such development requires appropriate infrastructure improvements.

66. However, I accept that the additional improvements to the road network that are required tend to be more local in nature than the road and junction improvements listed in Table 9, and in any event at this stage may not all be clearly defined. The realignment of Lower Granton Road is only one of several local road improvements that may be required. I therefore find that it is not necessary to include Lower Granton Road, or any other additional road improvement, within Table 9. I have also considered whether or not there should be any additions to Table 11 for the Edinburgh Waterfront. However, the Edinburgh Waterfront is a proposal generally rolled forward from the adopted Edinburgh City Local Plan. In this context, I find that the proposed additional policy recommended below, together with the Supplementary Guidance proposed through Policy Del 1, would provide a sufficient framework for any additional road proposal for the Edinburgh Waterfront required in relation the proposed development, including the development with respect to Proposal EW 2c. In overall terms, I therefore conclude that no change to the proposed plan is required.

67. I note that there is a current safeguarding proposal for a bypass for Currie (A70) in the adopted Rural West Edinburgh Local Plan. However, such proposals require review

according to the circumstances prevailing at each local development plan review. Whilst I acknowledge that the need for such a bypass has not specifically been addressed within the transport appraisal for this local development plan, I am satisfied that the transport interventions required in relation to the proposed new housing developments in South West Edinburgh do not extend to the need for a bypass for Currie. Such a bypass is therefore not considered by the council to be a sufficiently high priority for resources to be committed to this project during the life of the plan.

68. Difficult choices always have to be made when deciding upon the priorities for infrastructure improvement. With no likelihood of implementation during the plan period, it would not be appropriate to continue to safeguard the route for this bypass. This matter may be reviewed in future local development plans; the routes of any possible future bypass depending upon the circumstances prevailing at the time. I have noted that there is also a reference to the need for improvements to the A71 in the same representation, in the context of Table 9 and Policy Tra 9. Whilst the representation does not seek any specific changes to the local development plan, for the avoidance of doubt I would mention that the same principles would apply. No change to the plan is therefore required with respect to these representations.

69. Proposal T14 in Table 9 relates to the improvement of the Sheriffhall junction on the A720. This proposal states that the improvement should incorporate bus priority and safe crossing of the bypass for pedestrians and cyclists. I note that the project is included in the strategic development plan action programme 2013, firstly as action 34 in Table 3 on page 11, and secondly as actions 34 and 78 in Table 9 on page 34 (actions with cross boundary requirements or implications). The local development plan action programme 2015 also includes Proposal T14, but indicates that delivery is to be established at the strategic development plan level. The council states that the design of this junction upgrade is not a project which is being carried out under the provisions of the local development plan or being led by the council, and that the issue of road space priority being given to any particular mode is not one which will be determined using the local development plan.

70. Nevertheless, being a major project with significant cross boundary implications, I find that it requires to be safeguarded in the local development plan, and that it remains relevant for the matter to be pursued under the new policy and Supplementary Guidance included in the recommendations below. Since the local development plan requires to reflect the strategic requirements of SESplan, it needs to be sufficiently represented in the local development plan, even if the matter is considered more appropriate for implementation through the SESplan action programme than the local development plan action programme, owing to the necessary involvement of Transport Scotland, and the majority of the councils within the SESplan area. I am therefore satisfied that the content of Proposal T14 sufficiently reflects the provisions of SESplan at this time. Whether or not there is any prospect of public transport and cycle only use of any part of the junction would be a matter for subsequent consideration.

71. Proposal T7 in Table 9 relates to a new public transport link between Newcraighall and the Queen Margaret University Campus. The development principles for HSG 27 at Newcraighall East include provision for a bus route to be formed north-south through the site, which would connect to the Queen Margaret University Campus across land allocated for development in East Lothian. Further infrastructure improvements are suggested including bus priority measures for the Niddrie Mains Corridor, a bus only road from the Jewel to Fort Kinnaird and thence to the proposed Newcraighall housing

development and onward to the Queen Margaret University Campus, and accommodation for double deck buses under the bridge to the immediate west of Newcraighall village.

72. Essentially, the plan already provides for appropriate public transport links for the 3 proposed housing sites at Newcraighall and Brunstane (HSG 26, 27 and 29), through Proposal T7 and the development principles and site brief. Whilst I acknowledge that the improvements suggested in the representation would add further sustainable transport measures, they do not appear to be directly related to the development proposals at Newcraighall and Brunstane, and therefore the plan does not need to propose or safeguard land for such measures. Such measures could be considered under the local transport strategy and then progressed in the context of the relevant policies in the local development plan.

73. The proposed orbital bus route appears to be in the early stages of planning. Apart from a route from Straiton to Danderhall (along a disused railway line, which is shown on the proposals map under Proposal T5) neither the route nor the park and ride sites associated with this route have yet been identified with any degree of certainty. They therefore cannot be shown on the proposals map. However, Proposal T5 is an important element of the promotion of the use of public transport in Edinburgh.

74. Environmental effects may result from the proposed orbital bus route, for example in terms of further land requirements resulting from the widening of existing road carriageways to accommodate bus lanes, or from car parks associated with the bus route. Both of these may require the use of green belt land, although the environmental benefit from the increased use of sustainable forms of transport would have to be weighed against any environmental impact from the loss of green belt land. In any event, the environmental impact resulting from the proposal as it is developed, and any mitigating measures to reduce such impact, would have to be carefully considered.

75. The action programme is not part of the development plan and, whilst I accept that the details of the proposal and its timing would form an important part of that, the local development plan should provide a framework for assessing the environmental effects of the development of the orbital bus route. I therefore find that an additional sentence should be added to Proposal T5, and I provide appropriate text for this in the recommendations below. Other than this recommended change, I conclude that no modifications are required with respect to these representations relating to road and public transport.

Rail

76. Section 7 of the local development plan sets out the council's approach to sustainable modes of transport, including rail, and paragraph 84 refers to the programme to improve the rail connections between Edinburgh and Glasgow, including station improvements. There is no reference to a high speed rail route into the city centre, or where such a route may be accommodated. The National Planning Framework includes high speed rail between Edinburgh and Glasgow (and subsequently to London), as a national development. The high speed rail link to London is also shown as a national development within SESplan. However, the implementation of this would be beyond the plan period, and so there are no land use implications for the lifetime of the local development plan. In my view it is not therefore necessary to include any reference to high speed rail in the local development plan at the present time. Rather, the land use

implications resulting from this national development are for consideration in a future review of the local development plan.

77. The rail line at Abbeyhill is safeguarded under Proposal T2 specifically for new turn back facilities to allow for the reversing of trains. This appears to be more a management facility than a passenger facility. There is no evidence before me that there is any need, or that any consideration is being given, to the former Abbeyhill Station as a potential future rail station. I therefore find that it would be inappropriate to safeguard this former station in the same way that rail halts on the South Suburban railway line are safeguarded on the proposals map.

78. With respect to the South Suburban railway line, I understand that this is currently used for freight only, but that there is the potential for the reintroduction of passenger services. It appears unlikely that such would be implemented during the plan period, but whether the safeguarding of the 8 rail halts shown on the proposals map should remain is not before me for consideration. The representation on this matter simply seeks an even-handed approach to the safeguarding of infrastructure or land for future transport links, in that the reference to the rail authority's current assessment of the viability of passenger services is considered prejudicial to the implementation of Proposal T4.

79. The statement causing concern within the representation is a factual statement attributed to the rail authority. I find that the statement referred to does not undermine the sufficiency or the appropriateness of the plan, because the safeguarding of the rail halts is included within Proposal T4. The representation also appears to seek reconsideration of the lack of safeguarding for the line itself on the proposals map. However, since the line is operational and viable, I see no reason to include safeguarding for this on the proposals map. In overall terms, I conclude that no modifications to the proposed plan or the proposals map are required with respect to these representations relating to rail infrastructure.

Tram

80. The safeguarding of the tram route shown on the proposals map is indicative, and any proposals for development which may affect the implementation of the extension of the tram network to the Edinburgh Waterfront would be considered in the context of PolicyTra 7, taking into account the detailed design of the project as it progresses. The environmental impact of the tram infrastructure on sensitive parts of the city's character (such as the world heritage site and conservations areas) is a matter for detailed consideration in the context of the environmental and design policies set out in the local development plan. I therefore find that there is no requirement to include reference to the particular width of the tram route, the distance of buildings from the tram infrastructure, or any design criteria beyond that already included within the relevant policies of the local development plan.

81. I note the content of the representation which seeks the deletion of Proposal T1 owing to flawed market research and excessive cost. I find that the safeguarded tram route accords with the provisions of SESplan and the local transport strategy, and is justified within the transport appraisal of the local development plan. However, since phase 1 of the tram network has now been completed and is operational, I find that a modification to the text of Proposal T1 is required, and this is set out in the recommendations below. The line of phase 1 of the route (the existing route, which would no longer be a safeguarding route) should remain on the proposals map owing to

the provision for contributions through Policy Del 1. However, a separate notation should be provided for this as an existing tram route.

RESOURCES AND SERVICE PROPOSALS

Energy and waste

82. Renewable energy resources are an important part of ensuring a sustainable approach to the generation of energy, and the plan sets out the local development plan's approach to this in paragraph 89. This approach concentrates on producing energy by means other than large scale wind farms or wind turbine development, for which there is limited capacity within the city of Edinburgh. This is important in considering the nature of energy generation within development proposals. However, I do not consider that there is any requirement to provide more details; each proposal should be considered on its merits in the context of the relevant policies of the local development plan.

83. Paragraph 90 refers to Scotland's national waste strategy, the Zero Waste Plan, and in this context subsequent paragraphs indicate that more waste management facilities will be required. Accordingly, the local development plan supports existing and new waste management facilities. Other than a new waste management facility at Millerhill, in Midlothian, no other waste management facilities appear to have been so far identified. Future reviews of the local development plan should indicate where such facilities within the City of Edinburgh will be provided.

84. However, in the meantime, it is sufficient and appropriate to state that the plan supports new waste management facilities. These will need to be considered on their own merits in the context of the relevant policies of the local development plan, taking into account the provisions of the European Union's waste framework directive. The policy for the collection of waste from household and commercial bins within the city is for the council's waste management service, rather than for the local development plan.

85. I note that Craigiehill Quarry is a working quarry, and that planning permission has been granted for the infilling of the site with inert and composting material. I therefore find that it should be identified in Figure 10 of the local development plan as an operational quarry where waste management facilities are supported by Policy RS 3, and on the proposals map as a minerals site.

86. The requested clarification on invasive species during any composting process, which is referred to as a type of installation that will be needed in paragraph 91, is too detailed for the local development plan and is therefore unnecessary. I do not consider that it would be appropriate to refer to the timing of network services in paragraph 87, as this would depend on the circumstances of the case. In overall terms, other than the identification of Craigiehill Quarry within Figure 10, I conclude that no modifications are required with respect to these representations on energy and waste.

Flood Risk

87. Although this is not a matter raised by the council under this issue, I consider that general findings are required here relating to the representation from the Scottish Environment Protection Agency (SEPA) about the need for flood risk assessments and mitigation of flood risk. This then provides an appropriate context for the consideration of flood risk in the examination of development sites within the site specific issues.

SEPA has provided a matrix relating to all of the proposed development sites included within the local development plan with respect to the risk of flooding in the context of Scottish Planning Policy. None of the sites have been recommended for exclusion from the plan, but reference to the requirement for a flood risk assessment, and where appropriate mitigation measures, has been requested within the development principles for all sites where any there is a risk of flooding which justifies this.

88. The council has generally responded to the effect that such is not required, and that Policy Env 21 (together with the supporting text in paragraph 183) is sufficient to ensure that the need for an appropriate flood risk assessment, and any necessary resulting mitigation measures, are addressed through the development management process. It should also be noted that a change to the text of paragraph 183 is recommended through Issue 22. However, I consider that flood risk is a significant constraint on sites where it exists. The purpose of setting out development principles for proposals in the local development plan is to identify significant environmental or infrastructure matters that require to be addressed. In my view, the need for a flood risk assessment and any required mitigation measures fall into this category.

89. SEPA is the statutory body consulted by planning authorities about flood risk, and if its representations indicate that a flood risk assessment is required, or that specific mitigation measures are required, then this should be incorporated into the development principles where they are provided for specific sites in the local development plan. The only reason to consider departing from this approach would be a dispute about the risk, and this would be examined and addressed within the findings on the relevant site specific issue if it applied. Following on from this, additions to the development principles are recommended as considered appropriate through the site specific issues.

Reporter's recommendations:

Modify the proposed plan as follows:

1. Paragraph 268 – add the following text after the existing sentence:

These proposals relate to the significant known transport infrastructure which is required to accommodate new development (and in particular housing development) proposed in the local development plan, and where land needs to be safeguarded by the plan in order to allow the transport interventions to take place. In addition, other more local potential transport interventions relating to specific development proposals are set out within the development principles and site briefs for these proposals, and these are generally intended to inform the masterplan process for the particular development proposals concerned. Policy Tra 8 below ensures that development proposals address these transport interventions.

2. New policy Tra 8 (then renumbering subsequent policies) after paragraph 268:

Policy Tra 8 Provision of transport infrastructure

Development proposals relating to major housing or other development sites, and which would generate a significant amount of traffic, shall demonstrate through an appropriate transport assessment and proposed mitigation that:

- Identified local and city wide individual and cumulative transport impacts can be

timeously addressed in so far as this is relevant and necessary for the proposal.

- Any required transport infrastructure in Table 9 and in the general and site specific development principles has been addressed as relevant to the proposal.

- The overall cumulative impact of development proposals throughout the SESplan area (including development proposals in West Lothian, East Lothian and Midlothian) has been taken into account in so far as relevant to the proposal. Assessment should draw on the findings of the Cumulative Impact Transport and Land Use Appraisal Working Group once these become available.

The approach to the delivery of the required transport infrastructure is set out in Policy Del 1 (Developer Contributions and Infrastructure Delivery), and will be detailed within the Supplementary Guidance required through that policy.

3. New supporting paragraphs after the above new policy:

Policy 8 of SESplan requires local development plans to take into account the cross boundary transport implications of all policies and proposals. Policy 9 of SESplan requires local development plans to provide policy guidance that will require sufficient infrastructure to be available, or its provision to be committed, before development can proceed, and pursue the delivery of infrastructure through developer contributions, funding from infrastructure providers or other appropriate means.

The proposals in Table 9 and transport interventions in the development principles and site briefs take into account the cumulative impact of development proposals within the City of Edinburgh Local Development Plan as far as known at this time. However, further assessment is required to inform the detail of the necessary transport proposals and other interventions. In addition, the effects of development elsewhere within the city region are being considered within the study by the Cumulative Impact Transport and Land Use Appraisal Working Group, which is led by Transport Scotland and involves the constituent authorities within the SESplan area.

The outcome of this study will inform local development plans about the cumulative effect of development on major roads within the city region, including the M9, M8/A8, A720 (city bypass) and A1. Transport Scotland has identified potential transport improvements to the trunk road network which are detailed in the plan through the general development principles.

The Supplementary Guidance proposed through Policy Del 1 will address the delivery of the infrastructure required for the strategy of the plan in accordance with SESplan. The council will update its action programme annually in order to detail the actions required, those responsible and the relevant timescales.

It will also detail the need for further transport assessment to address cumulative impacts and the suitability of any proposed mitigation setting out a robust framework for assessment of development on sites allocated in the plan, and development which may separately come forward, including housing development on windfall sites progressed through Policy Hou 1. The guidance will take into account the findings of the cross boundary Cumulative Impact Transport and Land Use Appraisal Working Group. In the event that the findings of the Cumulative Impact Transport and Land Use Appraisal Working Group are not available when the guidance is being prepared, the guidance will

set out an interim approach to ensure these matters are taken into account pending further consideration in the next review of the local development plan.

4. Proposal T6 – delete this proposal from Table 9 and the proposals map.

5. Proposal T12 – change the second sentence to read:

Improvements to provide public transport priority and capacity improvements on the approach roads.

6. Proposal T8 – delete the proposed cycleway/footpath at Gilmerton Road from the proposals map.

7. Paragraph 85 – insert a new sentence after ... both as a means of transport and pleasure in line 4:

This takes into account the need to provide for people with limited mobility.

8. Proposal T5 – insert an additional sentence at the end of the existing text as follows:

The environmental effects of the proposed orbital bus route, including the loss of any green belt, will be fully considered through the development management process.

9. Proposal T1 – amend the text as follows:

The first phase of the tram line has now been completed and is operational. The plan safeguards long term extensions to the network connecting with the waterfront, to the south east and Newbridge.

10. Proposals map:

Show the existing line of the tram route on the proposals map with a different notation, referred to in the key as “existing tram route”.

11. Policy RS 3 – add Craigiehill Quarry to the operational quarries shown in Figure 10 of the local development plan, and to the minerals sites shown on the proposals map.

Issue 20	**Strategic Development Areas – other matters**	
Development plan reference:	**Part 1 Section 5 pages 40 – 57** **Table 3** **Table 4** **Table 10** **Table 11** **Policy Emp 6** **Policies Del 3-5** **Proposals Map**	**Reporter:** Lance Guilford

Body or person(s) submitting a representation raising the issue (including reference number):

0124	sportscotland
0133	Royal Yachting Association Scotland
0432	Greener Leith
0520	Trinity Community Council
0599	Granton Improvement Society
0698	David Wilson Homes and J & J Muir
0736	EDI Group
0828	Network Rail
1023	Edinburgh Airport
1129	AIA Art in Architecture
1159	New Ingliston Limited
1170	A.J.C. Clark
1501	British Airways PLC
1506	Forth Ports Limited
1660	Adrian Graham
1783	David Leslie
1789	Corstorphine Old Parish Church
1968	George Nicolson (Decorators) Ltd
2048	Duncan Smith
2086	Persimmon Homes (East Scotland)
2088	Scottish Government
2098	Artisan REI
2124	Edinburgh Chamber of Commerce
2126	Cockburn Association
2173	K J Wilson
2268	TIAA Henderson Real Estates
2275	Murray Estates
2276	Gladman Developments Ltd
2290	Edinburgh Developers' Group (Edinburgh Chamber of Commerce)
2313	Jeremy Darot
2341	New Town & Broughton Community Council
2402	West Craigs Ltd
2460	Scottish Power
2493	IBG Stakeholders
2497	Grosvenor
2505	Scottish Wildlife Trust
2517	Britannia Quay Proprietors Association (BQPA)
2570	Waterfront Edinburgh Ltd
2572	Royal Bank of Scotland
2602	Norma Tait
2664	Amanda Hutcheson
2675	Granton Central Developments Ltd
2679	NGS, RCAHMS, and HS
2682	Parabola Edinburgh Park LLP
2683	Scottish Enterprise
2685	John G Russel (Transport) Ltd
2687	Leith Central Community Council
2695	National Grid Property Holdings Ltd
2697	Scottish Natural Heritage
2699	Scottish Environment Protection Agency
2702	Scottish Canals

Provision of the development plan to which the issue relates:	These provisions of the Plan deal with the proposals, policies and development principles for the four Strategic Development Areas. This issue deals with those matters not covered in other issues.

Planning authority's summary of the representation(s):

CONTEXT

The Main Issues Report in Question 10 sought views on office provision, including policy on mixed used development in the city centre, and office allocations in Leith and Granton waterfronts. Question 6 set out options for land use and development in Leith Docks. Question 2 sought views on the principle of introducing provision for housing in the International Business Gateway and Edinburgh Park/South Gyle.

The first Proposed Plan set out provisions for these areas which are largely unchanged in the Second Proposed Plan.

CITY CENTRE

Proposal CC 1 – St James

- Seeks change to the title of Proposal CC1 from 'St James Quarter' to 'Edinburgh St. James', to reflect current branding of this project. Seeks addition to section in Table 10 to refer to the 'Picardy Place Development Principles', a document approved by the Council in 2009 as non-statutory guidance for the land to the north of Proposal CC 1. This area also formed part of a study zone for a development brief for the area of Proposal CC 1. **(2268 TIAA Henderson Real Estates)**
- Seeks a clearer statement of intent as to the route for the proposed integrated cycle path from Princes Street/George Street to Leith Walk. Aware that the detailed planning of this development is progressing but believes that a clearer statement at this late stage is still possible. **(2341 New Town & Broughton Community Council)**

Proposal CC 2 – New Street

- Supports approach to Proposal CC 2 generally, but wishes to see flexibility on site uses prevail, should new use mixes or development formats be necessary following substantive market testing of the permissions to help realise development on the site. Seeks unspecified text change to Proposal CC2 accordingly**. (2098 Artisan REI)**

Proposal CC 3 – Fountainbridge

- Seeks change to diagram for Proposal CC 3 Fountainbridge in Table 10 to refer to 'mixed use development' instead of 'housing led development' on sites to north of Dundee St/Fountainbridge. Queries why a distinction has been made between this area and areas to south. States that approach to north side is inconsistent with a statement in a development brief for the area approved by the Council as non-statutory guidance in 2005. This seeks to avoid rigid land use allocations and seeks 50-60% of development land for residential development. **(2497 Grosvenor)**
- Seeks removal of part of Proposal CC 3 Fountainbridge. The site, land adjacent to 36 Morrison Crescent, has a history of objections to planning applications for residential development. An application was previously refused and then dismissed at appeal. A new application was submitted in 2014. It does not

address the issues raised previously, which include design, height, scale, form, privacy, daylight, sunlight and immediate outlook. The site is unsuitable for development, and the affordable housing element of the wider Fountainbridge development should instead be incorporated into the main site. **(2664 Amanda Hutcheson)**

- Seeks addition of two new bullets to text for Proposal CC 3 Fountainbridge. One should refer to improving linkages into city centre and financial district. The other should refer to contributing to canal improvements and to exploring opportunities for surface water discharge to the canal. Developments beside the canal should contribute to canal-related improvements because the developments gain added value from being beside water and their residents are encouraged to use the canal. Developments should be integrated with the canal. **(2702 Scottish Canals)**
- Supports the approach to Fountainbridge site as set out in the Second Proposed Plan. **(0736 EDI Group)**

Other Sites

- Seeks to add a development site at Dewar Place as a City Centre Proposal in Table 10 and on the Proposals Map. The site is the subject of a masterplan approved by the Council on a non-statutory basis in 2010. The masterplan has established many principles and the site has sufficiently important potential within the context of the financial district to merit identification as a separate proposal in the Plan. **(2460 Scottish Power)**
- Seeks explicit recognition in Plan for development potential of land to rear of 36 St Andrews Square and around Registers Lane. The potential of this area for a complex, mixed use redevelopment is the subject of current discussions with the Council. This potential should be referred to in the relevant text of the Plan. **(2572 Royal Bank of Scotland)**

Policy Del 3 – City Centre

- Seeks change to Policy Del 3 to state support for new housing in the city centre. States that this seems a reasonable amendment and queries why a previous representation seeking this change had not been recorded in the Council's schedule of representations. **(2126 Cockburn Association)**
- Seeks change in the supporting text to Policy Del 3 to state that the policy's requirement for offices in major mixed use developments should not hinder other forms of appropriate development. Recognises need to provide new office provision in city centre, but considers that the aspiration to meet this need on sites for major mixed use development should not prevent other, non-office uses which are supported by the Plan or in briefs and which would bring significant benefits to an area. Cites Council's consideration of this issue at Main Issues Report stage as support for this change in approach. **(2497 Grosvenor)**

EDINBURGH WATERFRONT

Edinburgh Waterfront - General

- Supports in principle appropriate development in Leith and Granton Waterfront areas. States concern about impact of increased traffic levels for North Edinburgh and the lack of measures in the Plan to address these. Refers to scope of LDP

Transport Appraisal and objects to omission of North Edinburgh from its scope. Rejects reason given for this omission (that the Plan does not identify any additional development sites in the area that would impact on a North Edinburgh corridor). Cites changes in mix of uses in Plan's proposals for area and changes in existing and proposed transport network. Requests that the Plan be amended to include a comprehensive transport strategy for North Edinburgh. Also requests a commitment to prepare a revised 'Waterfront Area Development Framework'. **(0520 Trinity Community Council)**

- Objects to statements in paragraphs 109, 111 and 113 which assume there is no identified demand for large-scale industrial uses in Granton or Central and Western Leith. Potential for this should be retained, for reasons of locating housing within walking distance of workplaces and commercial facilities, placing easily replaced buildings in areas of coastal flooding and to retain and develop maritime interests, particularly for large vessels relating to industry and leisure. **(1170 A.J.C. Clark)**

Edinburgh Waterfront – Housing Capacity

- Objects to strategy for Edinburgh Waterfront as described in paragraphs 107 to 113. There has been no significant progress in residential development there since before the credit crunch. The Waterfront has seen a complete lack of activity and is not a location that the development industry is supportive of. There was no interest before the 'current economic conditions' referred to in the Plan either. The change in the Plan to introduce a business and industrial designation in the northern and eastern docks will do nothing to improve wider marketability of the area. The Waterfront fails the tests set out in Planning Advice Note 2/2010. The Council has no viable transport solution to enable delivery because the tram line will no longer reach the Waterfront area. A solution would be to re-allocate a significant proportion of the housing numbers from the Waterfront to areas that are marketable and deliverable such as Ratho. **(0698 David Wilson Homes and J & J Muir)**
- Seeks amendment to Table 3 to realistically reduce housing numbers for Edinburgh Waterfront or, at the very least, the timeframe as to which they will come forward needs to be examined. Concerned that the numbers across the majority of sites are far too high, and do not provide the correct mix of housing types required within the city. High rise flats have proved to be unpopular, which is one of the key reasons for limited development of further blocks in the last few years. Particularly in Leith Western Harbour which has undeveloped plots with no sign of movement and a large number of completed units failing to be sold. **(2086 Persimmon Homes (East Scotland))**
- Believes that the Plan's strategy to deliver a significant proportion of its housing requirement in Edinburgh Waterfront jeopardise the integrity of the Plan. There is clear evidence to suggest that these sites are not deliverable in the short term, if at all. Table 3 identifies existing housing proposals at the Waterfront with a total capacity of around 17,000 units, of which around 15,000 are yet to be delivered. However, the 2013 Housing Land Audit has only 321 units programmed for completion in the waterfront area pre-2020. Should not rely upon these capacity estimates with no evidence from developers to suggest these allocations will be delivered as previously anticipated. Commercial/ industrial uses may be more economically viable on sites previously allocated for housing and in a location dominated by a single landowner. The Council has little control over these and such non-residential uses may be accepted as departures from the development

plan meeting other objectives. Should review allocations and apply more realistic capacity estimates. Should respond to failure of Edinburgh Waterfront to deliver and focus on sites proven to be effective and deliverable in short term. Proposes site west of Ravelrig Road, Balerno as a sustainable and effective housing site**. (2276 Gladman Developments Ltd)**

- Seeks removal of sites at Edinburgh Waterfront from Plan. Concerned about over-reliance on these sites to help meet the identified housing requirement for Edinburgh. Refers to Edinburgh's Housing Land Audit 2013 which notes that a number of these sites remain undeveloped due to various constraints yet the Plan continues to include a number of these as part of the existing housing land supply. This over-reliance affects Edinburgh's ability to realistically maintain a five year effective housing land supply. **(2402 West Craigs Ltd)**
- Supports strategy for Strategic Development Areas generally but seeks more emphasis on how their relative importance will be carried forward. Suggests adding more emphasis on tests to ensure that proposals in the Plan are supported by likely occupier take up of built space for the purposes envisaged in the Plan. **(2290 Edinburgh Developers' Group (Edinburgh Chamber of Commerce))**

Edinburgh Waterfront – Flood Risk Assessments

- Strongly recommends that a strategic flood risk assessment is carried out for Granton Harbour. Seeks amendment in text for school safeguard Proposal SCH 4 to require a flood risk assessment to show the site is not at flood risk. **(2699 Scottish Environment Protection Agency)**
- Proposals EW 1 Leith Waterfront and EW 2 Granton Waterfront include areas identified as being at risk of flooding. Seeks a review of the flood risk assessment carried out for Proposals EW 1a to EW 1e Leith Waterfront to establish whether further assessment is required. Strongly recommends that a strategic flood risk assessment is carried out for Proposals EW 2a to d Granton Waterfront. States that highlighting the flood risk by adding additional text should make it clear to developers that flood risk is an issue that needs to be taken into consideration and that a flood risk assessment will be required to inform the scale, layout and form of development at the earliest opportunity. Refers to statutory duty for local authorities regarding flood risk. **(2699 Scottish Environment Protection Agency)**
- Refers to previous studies of flood risk in Leith Waterfront and agreed mitigation. Seeks amendment in text for school safeguard Proposal SCH 5 to require a flood risk assessment to show the site is not at flood risk. **(2699 Scottish Environment Protection Agency)**

Leith Waterfront – Overall land use strategy

- Seeks changes to Proposals Map, Tables 2 and 3 and Figure 9 which redesignate land in Leith Waterfront to Business and Industry Area, identify it as part of the Leith Docks Special Economic Area, and to remove cycleway/footpath safeguard through it. Supports Plan's emphasis on economic growth and identification of Leith Docks (Proposal EW 1e) as a Special Economic Area.
- Identifies extent of operational land for the port and intention to continue to use this for current and future port uses. Intended consolidation of port operations requires land to the south of Edinburgh Dock and land at Seafield (in EW 1d). Land to west of Ocean Terminal, known as 'Britannia Quay' remains in port operational use and is necessary to serve the cruise business and adjacent flour mill, which is a long-

term tenant. There is no intention to release land for alternative uses during the Plan period. Refers to Scottish Planning Policy on economic development and freight infrastructure. Refers to a Memorandum of Understanding signed by Forth Ports, the Council and Scottish Enterprise and dated November 2011 which agrees the continuing use and development of the port. Explains that Forth Ports' owners have continued to evolve their strategy for the port since then. Explains that although Forth Ports Ltd's response to the Main Issues Report supported the boundary of industrial designation and that of the mixed use designation as set out in the Main Issues Report, the Plan process has been protracted and it is unreasonable for the Council to use that Main Issues Report response. To do so constrains the growth and contribution which the port makes to the city's economy. There is a global trend for industrial uses to take place alongside import/export, bringing economic advantage and reducing the number of supply chain links, with carbon reduction benefits. Refers to permitted development rights available to port operators. These are limited and do not allow for industrial uses sought as part of the global trend.

- Therefore requests that Britannia Quay be designated as a 'Business and Industry Area. Recognises that industrial operations within the port should not have an adverse impact on the amenity of neighbouring residents. Suggests that this should be achieved where necessary through use of appropriate and proportionate conditions attached to planning permissions for industrial development in relevant locations. **(1506 Forth Ports Limited)**
- Supports the emphasis on economic growth in the Plan. Believes the Plan has to be framed in the context of Edinburgh's success based on a thriving economy, growing industry and supporting a skilled workforce attracting investment to the city balanced with the need for housing and social infrastructure. Believes the Plan should be revisited with regard to the land in the Waterfront being designated for housing when it could better serve the city as industrial/commercial and Port Operational land, creating jobs and economic benefit. This area has a key role regarding tourism because the berthing/embarkation area at the cruise liner terminal to the west of Ocean Terminal is expected to significantly grow in terms of cruise vessels, with highly valued visitors for the Leith business district and onward travel to the City Centre. **(2124 Edinburgh Chamber of Commerce)**

<u>Leith Waterfront – EW 1b Central Leith Waterfront</u>

- Objects to block layout indicated in diagram for Proposal EW 1b Central Leith Waterfront in Table 11. Consider that change is required to provide an attractive area for the public. First row of buildings immediately adjacent to quay edge should be removed. In particular suggest removal of current Smarts and cruise reception building to provide an open vista. To ensure the quayside is not in shadow suggest that building structures between Western Harbour and Chancelot Mill should be tiered in height. Suggest the reduction this would cause in housing numbers could be met in less sensitive locations. Wish to know what plans are for derelict building adjacent to Britannia Quay. **(2173 K J Wilson; 2517 Britannia Quay Proprietors Association (BQPA))**
- Supports principle of mixed use development proposed in the Central Leith Waterfront Area (EW 1b). Has significant land ownership in the Salamander Street area. **(2685 John G Russel (Transport) Ltd)**

Leith Waterfront – EW 1c Salamander Place

- Seeks change to Proposal EW 1c Salamander Place and extent of Business and Industry Area designation. Concerned that business/industrial use is not allocated on the land covered by Proposal GS 3 Leith Links Seaward Extension despite demand for current use. Not against principle of residential development but it should not be allocated if it means the loss of business/industrial units that are currently in use. **(1968 George Nicolson (Decorators) Ltd)**

Leith Waterfront – EW 1d Seafield and 1e Northern and Eastern Docks

- Seeks explicit recognition that statutory air quality limits for PM10 are already breached on Salamander Street, adjacent to Proposal EW 1d Seafield. States that the Council is likely to declare this an Air Quality Management Area to control this. Queries whether an energy from waste or biomass / combined heat and power plant could safely co-exist with proposed new housing nearby unless emissions were extremely controlled. **(0432 Greener Leith; 1660 Adrian Graham; 2687 Leith Central Community Council)**
- States that in 2014 Salamander Street had already exceeded 9 times the air quality standard for PM10. Seeks additional text in Table 11 to require industrial development of Proposal EW 1d and e (Seafield and Northern and Eastern Docks) to take this issue into account. **(2313 Jeremy Darot)**
- States that change to renewable energy industry instead of housing in the northern and eastern areas of Leith Docks may not have been fully tested and it is therefore reasonable to speculate that it may not be viable. Accordingly, this change of role should be closely monitored to ensure that no chance for housing development on a brownfield site is overlooked. Trying to locate compensatory housing sites on greenfield land has detrimental effects. **(2126 Cockburn Association)**
- Objects to text for Proposal EW 1e Northern and Eastern Docks which states that views from The Shore will be a factor in considering proposals for new larger buildings. Planning applications for new buildings within the Northern and Eastern Docks should be determined in accordance with Policies Des 1 to Des 13. There is no justification for introducing an additional layer of design control in this instance. **(2683 Scottish Enterprise)**
- Supports Business and Industry Area designation on Proposals Map and rail freight safeguard (Policy Tra 10) for area in Seafield north of Ocean Drive extension (Proposal T15). **(0828 Network Rail)**

Leith Waterfront – Greenspace

- Considers the extent of Proposal GS 2 Leith Western Harbour to be too small to be attractive. Removing inner ring of housing would allow a more attractive route to be created. Questions lack of provision for cruise liners and would support a specific allocation. Suggests that some housing capacity could be transferred to less sensitive areas, for example the east end of Proposal EW 1b and in EW 1c. **(2173 K J Wilson; 2517 Britannia Quay Proprietors Association (BQPA))**
- Seeks identification of a new significantly sized public park in the EW 1b Central Leith Waterfront area. Refers to information in Council's Open Space Audit (2009) which shows that Leith has lowest amount of open space per population in Edinburgh, and the poor condition of the Premier Park in the area. Refers to Leith's very high population density and heavy pressure on its greenspaces.

States that brownfield areas adjacent to Leith Docks are the only opportunity to provide new greenspaces. Suggests as an example the site lying between Ocean Drive and the Albert Dock Basin. **(0432 Greener Leith; 1660 Adrian Graham 2687 Leith Central Community Council)**

- Seeks enlargement of Proposal GS 3 Leith Links Seaward Extension to run to coast and to extent westwards into EW 1c. Refers to information in Council's Open Space Audit (2009) which shows that Leith has lowest amount of open space per population in Edinburgh, and the poor condition of the Premier Park in the area. Refers to Leith's very high population density and heavy pressure on its greenspaces. Refers to original extent of Leith Links Seaward Extension proposal as shown in Edinburgh City Local Plan, and states regret that the extension has been reduced to a cycleway safeguard. **(0432 Greener Leith; 1660 Adrian Graham; 2687 Leith Central Community Council)**
- Objection to Proposal GS 3 Leith Links Seaward Extension on the grounds that there is no demand for greenspace in this area presently. It is understood from the current Edinburgh City Local Plan programme that adjacent proposal EW1c could take up to 30 years to be completed. The Plan should not be prescriptive in allocating this area of greenspace and that green or open space proposals should be provided when development comes forward. No objection to Plan's aspiration to extend GS3 across Leith Links to Salamander Place and connect with the cycle/footpath on the coast as long as it is not detrimental to the use of current business/industrial units on the site. **(1968 George Nicolson (Decorators) Ltd)**

Granton Waterfront – EW 2a Forth Quarter

- Supports Proposal EW 2a Forth Quarter and its text. States commitment to delivering the 1,053 housing units identified in the Plan, in the locations identified in the Plan. This support is provided the site is developed in line with appropriate market demand and good planning for each phase. Current market demand is for 'family' homes, which inevitable means less dense development involving less flatted development. Seeks rewording of bullet points in Table 11 which refer to housing mix, which is repeated for Proposals EW 2a, EW 2b and EW 2c. States that Edinburgh Waterfront is expected to deliver 15,000 units in the Plan period. This is ambitious in terms of build rate and provision of new homes in a small area of the city. Each land owner and developer will need flexibility to assess the market at any given time and bring forward appropriate proposals. The unbuilt portion of Forth Quarter west of the park is the subject of bids by developers, all on the basis of a lower density than in the 2004 masterplan. The Plan needs to be flexible in terms of house types and total numbers. **(2695 National Grid Property Holdings Ltd)**

Granton Waterfront – EW 2b Central Development Area and 2d North Shore

- Supports identification of two plots in EW 2 Granton Waterfront as open space on the Proposals Map. Describes the Granton Improvement Project's aspirations to acquire ownership of these plots to enable a project involving International Garden Festival, artisan village of up to 150 studios, and potentially a community sports area in conjunction with the Edinburgh Promenade. **(0599 Granton Improvement Society; 2602 Norma Tait)**
- Concerned about proposals for development on three plots in Granton Waterfront. Refers to various recent and older proposals and for these plots. Refers to the Granton Improvement Project's aspirations to acquire ownership of these plots to

enable community projects. **(1129 AIA Art in Architecture)**

- Concerned that Second Proposed Plan is ambiguous in its identification of greenspace at Caroline Park and Granton Castle Walled Garden. Figure 12 indicates greenspace, but the diagrams in Table 11 show these differently. Seeks clearer reference to protection and enhancement of these locations. **(1783 David Leslie)**
- Seeks changes to text and diagrams for Proposals EW 2b and 2d in Granton Waterfront, as follows.
    - Seeks identification of specific plots for 'housing-led mixed use development' in the diagrams in Table 11.
    - Seeks additional policy emphasis on retail and commercial leisure at the former Granton Station site and adjacent land by expanding Local Centre designation. This would provide greater certainty and longer term policy protection and would relate to the final bullet in the Development Principles added in the approval of the Second Proposed Plan.
    - Seeks clarity on references to 'site briefs' and 'masterplans' in paragraph 134 and Table 11.
    - Seeks reference to 'houses' as well as 'townhouses' in Table 11. Reference to need for more townhouses is not an entirely accurate reflection of current market conditions and housing demand, and suggests a limitation on house types. There is inconsistency between wording of Policy Del 4 and Table 11 in references to house types.
    - Seeks identification of two plots in Proposal EW 2b Central Development Area (known as Plots N and Q in the approve masterplan) as 'housing-led mixed use development' on diagram in Table 11. This is on the basis that they have received detailed planning permission for development and that there have been no significant changes in circumstances since.
    - Seeks revision of boundary of Proposal EW 2b Central Development Area to include a plot of land currently shown in the easternmost part of EW 2d North Shore. This is on the basis that it has planning permission for development and its inclusion with Proposal EW 2b would allow better integration and compatibility between sites and early delivery.

  Also asks that the Council's Housing Land Audit identify the status of specific site (4792 in the audit) as 'effective' rather than 'constrained', on the basis that it has been the subject of a planning permission for development. **(2570 Waterfront Edinburgh Ltd)**
- States vision and proposals to create a new National Collections Facility for the representees, to be potentially located in Proposal EW 2b Central Development Area. Relates to existing presence of National Health Service and National Museum of Scotland buildings and previous application proposals. Seeks addition of word 'cultural' to Development Principles for Proposal EW 2b in Table 11. Seeks change to diagram in Table 11 to show five blocks as 'commercial-led mixed use' rather than housing-led mixed use'. **(2679 National Galleries of Scotland (NGS), Royal Commission of the Ancient and Historical Monuments of Scotland (RCAHMS) and Historic Scotland (HS))**

<u>Granton Waterfront – EW 2c Granton Harbour</u>

- Seeks changes to the Development Principles for Proposal EW 2c Granton Harbour. States that the Granton Harbour Masterplan approved in 2009 is out of date in terms of housing market and for current expectations regarding tourist, marina and berthing facilities. The masterplan has already been amended. The

Plan places unduly prescriptive and inflexible restrictions which will frustrate current detailed site planning and the creation of a vibrant mixed use neighbourhood. There are many reasons why changes from the 'approved street layout' may be justifiable in planning applications. Reference to revising the housing mix towards more townhouses ignores the caution of the Scottish housebuilding industry towards this type of accommodation. Aspire to attract families and so reference to 'townhouses' should be replaced by 'family housing'. Considers that identification of proposed Local Centre (Proposal S2) prevents reconsideration of layout which may favour creation of an activity centre nearer Granton Square and potential tram, hovercraft and/or ferry services. Also prevents more than one centre which could be justified. Opposes the requirement that commercial units be located 'under flatted development'. This ignores practical difficulties in servicing retail units and reduces the amenity of the flats above. Although this has become accepted in city-centre locations and there may be locations in Granton Harbour where it could be possible, such a detailed blanket requirement throughout Granton Harbour is unduly proscriptive and prevents consideration of alternatives through masterplan revisions and detailed planning applications. Opposes restriction to the supermarket to 1,500sq.m. This is insufficient for a reasonably-sized local' store for supermarket chains. Opposes suggestion that there be only one supermarket, as residents will expect choice. Seeks removal of this text. Variation from masterplan approval should be open to agreement as part of consideration of a planning application. Opposes proscription in Plan for cycle route reservation. The route shown has already proven to be impractical as it intrudes into the working areas of Middle Pier, contravening health and safety and security protocols. Route should instead be considered through masterplan revisions. **(2675 Granton Central Developments Ltd.)**

- Seeks changes to wording of text for Proposal EW 2c Granton Harbour to clarify that boat storage is also protected. This needs to be retained near the slipway to allow safe launching and retrieval and winter storage. Seeks amendment to wording of Policy Del 4 to reiterate principle of safeguarding existing water resources. **(0124 sportscotland)**
- Seeks explicit reference to retention of access to slipway on east side of Middle Pier in Proposal EW 2c Granton Harbour. The slipway is used by several different types of water recreation users. The slipway, sufficient space at its head to manoeuvre trailers and nearby boat storage all need to be retained. **(133 Royal Yachting Association Scotland)**

<u>Policy Del 4 – Edinburgh Waterfront</u>

- Seeks amendment to wording of Policy Del 4 to reiterate principle of safeguarding existing water resources, as stated in Table 11. Also states that not all water recreation in Edinburgh is based around harbours, and cites examples outwith the Edinburgh Waterfront development areas identified on the Proposals Map. Seeks clarification of what is meant by 'harbour' and 'retained'. **(0133 Royal Yachting Association Scotland)**
- Seeks new criterion in Policy Del 4 to refer to the provision of new green spaces and civic spaces. This will provide support and consistency with the development principles in Table 11. **(2126 Cockburn Association)**
- Concerned that new cycle paths will be of limited use unless they connect to the wider urban cycle network. Seeks addition to wording of Policy Del 4 Edinburgh Waterfront accordingly. Identifies three paths for which there is potential for cycle

paths in the Waterfront to connect to: Almondvale path, from Lindsay Road; Water of Leith path, from Sandport Place; a future cycle path proposed to run from Leith Walk, through George Street to Roseburn, to be accessed from the foot of Leith Walk. **(2313 Jeremy Darot)**

- Supports Policy Del 4 Edinburgh Waterfront, which aims to increase sustainable transport mechanisms and recreational opportunities and increase the connectivity of the green space corridor. This accords with the Edinburgh Living Landscape. **(2505 Scottish Wildlife Trust)**

WEST EDINBURGH

General

- The West Edinburgh Planning Framework is no longer in force; the National Planning Framework 3 sets out the strategic approach. **(2088 Scottish Government)**

Edinburgh Airport and Royal Highland Centre

- Within the airport boundary and around the fringes there is an opportunity to promote ancillary developments, such as hotels, which can both complement and act as a catalyst for the development of the Royal Highland Centre and the International Business Gateway sites. Policy Emp 4 should be amended to include reference to such uses. **(1023 Edinburgh Airport)**
- Amend the text in Policy Emp 4 to allow for airport uses for the existing Royal Highland Centre site in the long term in accordance with the Edinburgh Airport Masterplan. **(2088 Scottish Government)**
- Omit land east of Ratho Station from safeguard for relocation of Royal Highland Centre. Separate representation seeks its allocation for housing. **(2275 Murray Estates)**
- Welcomes the designation of the airport as a Special Economic Area and the support for ancillary facilities in Policy Emp 4. The safeguarding of land to the north of the existing airport for a second runway expansion is supported, as is the safeguarding of land at Norton Park in Policy Emp 5 and hotel development in the boundaries of the airport in Policy Emp 10. **(1501 British Airways PLC)**

International Business Gateway

- Objects to reference to housing allocation in International Business Gateway. The Plan is not clear on the number of housing units and site area and so should the allocation should be deleted from the Plan and only counted as windfall development should housing every come forward. There are also residential amenity concerns associated with the proximity to the airport. Residential development expected from this site could be accommodated in land at east Ratho. **(0698 David Wilson Homes and J & J Muir)**
- Amend the text in Policy Emp 6 IBG to ensure residential units in the IBG are phased and remain ancillary to the main business use and housing will not be to the detriment of the special economic area that is of national importance. **(1023 Edinburgh Airport)**
- Seeks introduction of a new proposal - 'Proposal WE1: International Business Gateway' - to cover the area covered by Policy Emp 6 on the Proposals Map.

Seeks changes to description and Development Principles on pages 54. Changes reflect withdrawal of West Edinburgh Planning Framework and references in National Planning Framework 3. Changes seek to update the role of the IBG as a business-led city extension with additional references to placemaking and housing. A separate representation seeks increase in overall housing figures (see Issue 5). Refers to public transport accessibility and other connectivity attributes. Suggests that within the existing agreed design parameters, development potential is: 160,000sq.m. business and office space; 1,600 hotel bedrooms; at least 2,350 residential units; education uses and ancillary leisure and retail uses. **(1159 New Ingliston Limited; 2493 IBG Stakeholders)**

- Seeks changes to Policy Emp 6 International Business Gateway and supporting text. These are intended to align with the description of the allocation as Proposal WE 1. Changes to the policy should include changing specific reference to housing, and removing specific references to some of the uses considered to be ancillary to international business development to leave a more general statement. Changes to the supporting paragraph should remove reference to the purpose of the IBG's main purpose and to the West Edinburgh Planning Framework, and to introduce reference to the West Edinburgh Landscape Framework. **(1159 New Ingliston Limited; 2493 IBG Stakeholders)**
- Raises queries about diagram for International Business Gateway on page 55. The plan is not annotated and has no scale to show how large it is. Unclear whether the tram follows the same route as the bus corridor. Apparent tram line symbol is different to that on page 53. **(1170 A.J.C. Clark)**
- Parish boundary includes IBG and RBS Gogar. Seeks additional reference in Development Principles for International Business Gateway to respecting the built heritage of Nether Gogar and giving preference to residential use near the listed Gogar Church and the scheduled Gogar Mains Fort. The height and layout of housing would be in keeping with the church and mature trees. Considers that well designed housing and other mixed uses could enliven what would otherwise be a 'dead' area after normal office hours. Concerned about traffic impact from IBG. **(1789 Corstorphine Old Parish Church)**
- Seeks a review of the Development Principles for the International Business Gateway to establish whether the West Edinburgh Strategic Design Framework needs revision of its overall design concepts. If so, a West Edinburgh Strategic Design Framework 2 should be prepared through international multidisciplinary design competition. No specific comments on content of current West Edinburgh Strategic Design Framework made. **(2126 Cockburn Association)**
- Seeks identification of a site in the eastern part of the IBG for residential development and another site for general industrial and storage/distribution development. The land is separate from the main IBG so lends itself to housing rather than Class 4 development within the main IBG. Site could provide 250-500 homes and can be easily served by extending existing roads. Site is close to existing and proposed tram stops and proposed new station at Gogar. Housing has previously been approved on land to the north at Castle Gogar. Does not consider the Edinburgh International Development Partnership Board to be an appropriate vehicle to provide the masterplan or delivery, as it is not a collection of all land interests and has not to date acted in an open or transparent manner. The withdrawal of the West Edinburgh Planning Framework is a withdrawal of the IBG and therefore should lead to a close analysis of the various constituent land parts of the former IBG. Also considers that small site immediately to west of the tram depot is ideal for general industrial and storage /distribution uses. There is evidence of demand for such uses. Class 4 office lacks viability and it is not

appropriate to condition the provision of residential within the former IBG to the delivery of Class 4. **(2402 West Craigs Ltd)**

- The International Business Gateway includes land within an area of known flood risk. The LDP Environmental Report - Second Revision Appendix 3 (page 69) identifies the indicative extent of the risk. The Environmental Report also states that a flood risk assessment will be required. There are records for the Gogar Burn flooding further downstream at the Hilton Hotel. Scottish Environment Protection Agency is aware of proposals to realign the Gogar Burn however the route has not been finalised. A flood risk assessment therefore needs to be carried out. Advice is given on scope and method of appropriate assessment. States that highlighting the flood risk by adding additional text should make it clear to developers that flood risk is an issue that needs to be taken into consideration and that a flood risk assessment will be required to inform the scale, layout and form of development at the earliest opportunity. Refers to statutory duty for local authorities regarding flood risk. **(2699 Scottish Environment Protection Agency)**

<u>Edinburgh Park/South Gyle</u>

- Seeks removal of Policy Del 5 Edinburgh Park /South Gyle from the Plan. This should be a proposal as it is a stated Council intention towards development of a piece of land. The Plan notes that this area is dominated by employment uses. The scale of indicative residential release proposed through Policy Del 5 may not be achievable as the site at Edinburgh Park may not become available for residential use and may instead be solely developed for employment uses. **(0698 David Wilson Homes and J & J Muir)**
- Queries the clarity of Edinburgh Park/South Gyle diagram on page 57. The 'primary pedestrian/cycle route' shown emerging to the north east of the Gyle, which could lead to the Maybury and Cammo developments, should make clear how it intends to cross the dual carriageway at Maybury. A bridge or tunnel is clearly required yet such major infrastructure is not called for in the proposal. **(2048 Duncan Smith)**
- Suggests clarification of last criterion in Policy Del 5 Edinburgh Park/South Gyle. These would place emphasis on transport hubs and routes to other parts of the city and beyond, which is more appropriate that referring just to the surrounding area. Reference to 'direct' links rather than 'strong' links reflects Scottish Planning Policy paragraph 46 better and is more easily understood. **(2697 Scottish Natural Heritage)**
- Welcomes reference to opportunity for additional retail units in Development Principles and diagram for Edinburgh Park/South Gyle, but states that careful consideration needs to be given to its location. Development across the Gyle Centre's car parks is highly unlikely to be accepted by the anchor stores, who have a significant say in any development, given the terms of their lease and their reliance on the private car and its required associated parking. Unless there is some alternative parking provided this needs to be removed from the plan as developable for retail. **(2086 Persimmon Homes (East Scotland))**
- Edinburgh Park/South Gyle include land within an area of known flood risk arising from the Gogar Burn which runs through the area. The LDP Environmental Report - Second Revision Appendix 3 (page 69) identifies this risk. A flood risk assessment is therefore required. States that highlighting the flood risk by adding additional text should make it clear to developers that flood risk is an issue that needs to be taken into consideration and that a flood risk assessment will be required to inform the scale, layout and form of development at the earliest

opportunity. Refers to statutory duty for local authorities regarding flood risk. **(2699 Scottish Environment Protection Agency)**

- Acquired land at Edinburgh Park in 2014 and is developing a masterplan for its southern half. Seeking to create a successful, sustainable, low carbon, resilient and more connected place, consistent with national policy. Has no objection in principle to emerging principles for future of Edinburgh Park. Seeks as much flexibility as possible, to allow the masterplan to accord with the above outcomes. **(2682 Parabola Edinburgh Park LLP)**
- Parish boundary includes Edinburgh Park and the Gyle Shopping Centre. Supports Plan's introduction of housing and other appropriate mixed uses to this area, as the business park has become rather too large and 'monolithic'. Proposed housing sites shown in diagram on page 57 are well placed in relation to the trams and rail station. Of all the housing sites in West Edinburgh this area lends itself to high density. **(1789 Corstorphine Old Parish Church)**

<u>RBS Gogarburn and related matters</u>

- Welcomes clarification of Figure 1 from first Proposed Plan. Considers that red notation signifying 'major new development in strategic development area' should also cover the RBS headquarters at Gogarburn. It is identified in the Plan as a Special Economic Area and is covered by Policy Emp 7. Table 2 states that part of the site remains undeveloped and provides the opportunity for additional office and ancillary development. This demonstrates that it should also fall within the category of possible major new development in a strategic development area. This could also apply to land at Gogarmount which is the subject of a separate representation. Also considers that Figure 1 should identify the RBS headquarters at Gogarburn as an 'employment centre. It covers 15-18 hectares, accommodates 3,600 employees and also has planning permission for a second phase development of 14,000sq.m of offices to the south. It is therefore comparable to other significant employment centres shown on the spatial strategy, such as Heriot Watt, the Gyle and the Bio-Quarter. **(2572 Royal Bank of Scotland)**
- Welcomes addition of reference in Figure 13 to 'RBS Gogarburn' from the first Proposed Plan. Considers that it is unclear what the red line boundary on this plan represents and that it is therefore misleading and confusing. Seeks it to be amended to either reflect the boundary of the strategic development area or to cover the RBS headquarters at Gogarburn. Also seeks addition of Development Principles for 'Gogarpark' in same format as other sites in the strategic development area. This would recognise the potential for further office and ancillary development at RBS Gogarburn phase 2 and possible sensitive redevelopment at Gogarmount, the subject of a separate representation. **(2572 Royal Bank of Scotland)**
- Amend the text in Policy Emp 7 by replacing 'existing headquarters' with 'existing function of the site' and remove 'are acceptable in terms of impact on green belt objectives'. **(2572 Royal Bank of Scotland)**
- RBS owns land to the west of its headquarters at Gogarburn, beyond Gogarburn golf course, at Gogar Mount Estate. This extends to 11.6 hectares and comprises Gogar Mount House and associated buildings. The site is enclosed by tree belts and comprises areas of gardens, parklands and woodland with potential to be restored to their original condition. The site has opportunity for sensitive mixed use development and could contribute toward achieving objectives of the West Edinburgh strategic development area. This includes potential for housing development along with other potential mixed uses. These could support existing

and planned investment in international business facilities at West Edinburgh. Demand for executive style housing in this part of the city is likely to increase and could be addressed in this sustainable location. Could also be a candidate site for removal from the green belt to meet housing land requirements. **(2572 Royal Bank of Scotland)**

Infrastructure Matters

- Seeks a new policy - 'Policy Del 6' - to describe an approach to a West Edinburgh infrastructure delivery mechanism. Wishes to engage in a dialogue on this matter. Understands that such a dialogue has been commenced by the Convenor of Planning and the Scottish Property Federation. **(1159 New Ingliston Limited)**
- Seeks changes to description of school safeguard and references to new school provision. Considers that the provision of a new school as part of the Maybury development should be assessed as part of the proposed Site Brief, not as a prerequisite. Full catchment reviews are needed to assess existing capacity before seeking any new provision. There should be strict adherence to catchment enforcement. Developer contributions have to be justified and necessary and in accordance with national policy. Any land for a new school should have full market value. The Council should advance funding for the schools to accord with development from 2015 onwards. Maybury development is likely to happen quickly so focus should be on delivery of primary school at Turnhouse Road (SCH 6) and extension and enforcement of catchment (including catchment review) at Craigmount High to ensure sufficient capacity for opening. **(2402 West Craigs Ltd)**
- Seeks site specific changes in Table 9 Transport Proposals and Safeguards. Generally opposed to seeking infrastructure upgrades before any detailed work has been completed on the likely mitigation level required for certain developments. Refers to national policy on use of contributions. Makes statements about landtake requirements for junction upgrades proposed at Maybury Junction and Craigs Road Junction. Objects to Maybury sites only being the proposed funders of the pedestrian cycle bridge near Edinburgh Gateway station. This is part of the proposed green corridor from Cammo to the IBG so that should be the widened area for contributions. States that the Council should ensure the delivery of suitable junctions to that the further expansion of West Edinburgh is successful. States that Lothian Buses have expressed a preference for a new, fourth arm to be added to the Bughtlins roundabout rather than signals at Craigs Road/Maybury Road junction. **(2402 West Craigs Ltd)**
- Seeks additional text in section on green networks to state who will pay for the cost of providing connectivity for green corridors in circumstances where the Council has failed to make provision for such connectivity. Refers to national policy on developer contributions. **(2402 West Craigs Ltd)**

Other Matters

- Seeks statement in paragraph 88 on strategy for sustainable energy to state that there is no requirement for any development in West Edinburgh to comply with the full building standards related to sustainable energy. This will not be possible due to the proximity of the area to Edinburgh Airport. States that Edinburgh Airport seek a restriction on height to two storey. **(2402 West Craigs Ltd)**

Modifications sought by those submitting representations:

CITYCENTRE

Proposal CC 1 – St James

- Amend title of Proposal CC 1 from 'St James Quarter' to 'Edinburgh St. James'. In Table 10, add reference to 'Picardy Place Development Principles'. **(2268 TIAA Henderson Real Estates)**
- Amend text for Proposal CC 1 St James Quarter in Table 10 so that final bullet reads: 'a new civic space, public pedestrian and cycle routes to strengthen links with the surrounding area, especially St Andrews Square, Picardy Place and Princes Street.' **(2341 New Town & Broughton Community Council)**

Proposal CC 2 – New Street

- Amend text for Proposal CC 2 New Street in Table 10 to recognise that flexibility of site uses should prevail if new necessary to help realise development following marketing testing. **(2098 Artisan REI)**

Proposal CC 3 – Fountainbridge

- Amend diagram for Proposal CC 3 Fountainbridge in Table 10 so that areas north of Dundee Street/Fountainbridge are identified as 'Housing-led mixed use development' are instead ' Mixed use development'. **(2497 Grosvenor)**
- Objects to Proposal CC 3 Fountainbridge, specifically the land adjacent to 36 Morrison Crescent. Seeks removal of small plot identifies as 'housing led mixed use development' on north side of Western Approach Road in diagram in Table 10. Instead, identify as greenspace or part of green network. **(2664 Amanda Hutcheson).**
- Amend text for Proposal CC 3 Fountainbridge to include two additional bullets: 'improve linkages into the city centre/financial district' and 'proposals should contribute to canal improvements and explore opportunities for surface water discharge into the canal'. **(2702 Scottish Canals)**

Other Sites

- Identify a development site at Dewar Place as a City Centre Proposal in Table 10 and on the Proposals Map. Formalise the approved masterplan within Table 10. Resolve a contradiction in the text of paragraph 106, which refers to proposals at Dewar Place being assessed in relation to Policy Del 3, despite that policy apparently only referring to City Centre Proposals. **(2460 Scottish Power)**
- Amend text in paragraph 106 to explicitly identify property at 36 St Andrews Square and in wider 'Registers Lane' area as having development potential. **(2572 Royal Bank of Scotland)**

Policy Del 3 – City Centre

- In Policy Del 3 criterion c) insert 'and/or residential accommodation' after 'offices'. **(2126 Cockburn Association)**
- Amend supporting text to Policy Del 3 to state that the requirement in criterion (c)

of the policy to provide offices in major mixed use developments will not hinder other forms of appropriate development. **(2497 Grosvenor)**

EDINBURGH WATERFRONT

Edinburgh Waterfront - General

- Include a transport strategy for North Edinburgh and a commitment to prepare a revised development framework for the Edinburgh Waterfront. **(0520 Trinity Community Council)**
- Objections to statements in paragraphs 109, 111 and 113 which assume there is no identified demand for large-scale industrial uses in Granton or Central and Western Leith. Seeks provision to retain and develop maritime interests. **(1170 A.J.C. Clark)**

Edinburgh Waterfront – Housing Capacity

- Objects to strategy for Edinburgh Waterfront as described in paragraphs 107 to 113. Suggests re-allocation of a significant proportion of the housing numbers expected from the Waterfront to areas that are marketable and deliverable such as Ratho. **(0698 David Wilson Homes and J & J Muir)**
- Amend Table 3 to reduce housing numbers for Edinburgh Waterfront or to re-examine the timeframe for them coming forward. **(2086 Persimmon Homes (East Scotland))**
- Revise the strategy for the waterfront to recognise that housing development will not be delivered here in the short term and that the estimated capacities are unlikely to ever be achieved. **(2276 Gladman Developments Ltd)**
- Amend Table 3 to remove sites in Edinburgh Waterfront as existing housing sites. **(2402 West Craigs Ltd)**
- Suggests adding more emphasis on tests to ensure that proposals in the Plan are supported by likely occupier take up of built space for the purposes envisaged in the Plan. **(2290 Edinburgh Developers' Group (Edinburgh Chamber of Commerce))**

Edinburgh Waterfront – Flood Risk Assessments

- Amend text in Table 11, either to introduce a general development principle, or a site specific development principle for each area, which reads 'For sites EW 1a to EW 1e, flood risk assessments should be reviewed. For sites EW 2a to EW 2d a strategic flood risk assessment should be provided.' Amend text in Table 5 or Table 11 to state the need for flood risk assessments to identify that the school sites safeguarded in Leith Waterfront (Proposal SCH 5) and Granton Waterfront (Proposal SCH 4) are not at flood risk. **(2699 Scottish Environment Protection Agency)**

Leith Waterfront – Overall land use strategy

- Amend Plan as follows:
  - Identify land at Britannia Quay and land south of Edinburgh Dock as 'Business and Industry' on Figure 6 and on the Proposals Map.
  - Identify land at Britannia Quay, land south of Edinburgh Dock and land at

Seafield as part of the Leith Docks Special Economic Area in Table 2.
    - Amend Table 3 and Proposals Map to remove land at Britannia Quay and land to the south of Edinburgh Dock from the 'Central Leith Waterfront' area.
    - Amend Proposals Map and Figure 9 to remove the section of 'cycleway/footpath' safeguard which runs through operational port estate along the northern boundary of Britannia Quay, along Albert Road and Marine Esplanade. **(1506 Forth Ports Limited)**
- Amend Plan to allow the Waterfront Area and the Port of Leith to flourish as an operational port and cruise liner terminal. Land designated for residential use in that area and the number of housing units associated with this land should be replaced by an alternative supply. **(2124 Edinburgh Chamber of Commerce)**

Leith Waterfront – EW 1b Central Leith Waterfront

- Amend text for Proposal EW 1b Central Leith Waterfront in Table 11 to change development principles as follows: proposals should implement the block layout subject to keeping the area around the Harbour (SW Quay) clear of any buildings over a depth of at least 30m from the quay edge and the SW corner of the Harbour quay should be kept clear of structures from the quay edge to the tram route. Amend block layout in diagram to reflect change. **(2173 K J Wilson; 2517 Britannia Quay Proprietors Association (BQPA)).**

Leith Waterfront – EW 1c Salamander Place

- Amend Proposal EW1c Salamander Place to allow for business/industrial land to be maintained as part of the mixed use development proposed. **(1968 George Nicolson (Decorators) Ltd)**

Leith Waterfront – EW 1d Seafield and 1e Northern and Eastern Docks

- Amend text for EW 1d Seafield in Table 11 to explicitly recognise that statutory air quality limits for PM 10 are regularly breached in and around this area, and to require that any industrial or combined heat and power or energy from waste development be designed to mitigate against any further increase in pollution levels. **(0432 Greener Leith; 1660 Adrian Graham; 2687 Leith Central Community Council).**
- Amend text for Proposal EW 1 d and e Seafield and Northern and Eastern Docks in Table 11 to include new bullet: 'existing issues with air quality standards compliance in neighbouring areas. New industrial developments, including power generation, should not degrade air quality any further. **(2313 Jeremy Darot)**
- Amend paragraph 113 so that first sentence reads 'This change in policy designation that most of the docks area...' and to insert sentence after first to read 'Opportunities for housing development on prime locations along the north eastern edges of Leith Docks will be kept under review.' **(2126 Cockburn Association)**
- Amend text for Proposal EW 1e Northern and Eastern Docks in Table 11 to delete second bullet point, which refers to considering views from The Shore. **(2683 Scottish Enterprise)**

Leith Waterfront – Greenspace

- Enlarge Proposal GS 2 Leith Western Harbour Central Park by removing or limiting

the inner ring of development blocks adjacent to the park's south east edge (as shown in diagram in Table 11). **(2173 K J Wilson; 2517 Britannia Quay Proprietors Association (BQPA))**

- Identify in the EW 1b Central Leith Waterfront area a new significantly sized public greenspace. **(0432 Greener Leith; 1660 Adrian Graham 2687 Leith Central Community Council)**
- Enlarge Proposal GS 3 Leith Links Seaward Extension to extend with an equal width all the way to the shoreline to provide more useful public greenspace and a visual link to the coast. Reduce area of EW 1d to accommodate this. Also extend Proposal GS 3 westwards into EW 1c. **(0432 Greener Leith; 1660 Adrian Graham; 2687 Leith Central Community Council)**
- Remove green space proposal GS3 Leith Links Seaward Extension. **(1968 George Nicolson (Decorators) Ltd)**

Granton Waterfront – EW 2a Forth Quarter

- Amend text in Table 11 so that the 'housing mix' bullet in Development Principles for EW 2a, b and c reads 'revise the housing mix towards a lower density, lower building height solution in order to provide an attractive, market facing development, better placed to create new and linked neighbourhoods, whilst still seeking to maximise appropriate housing densities to deliver much needed housing development to the Edinburgh Waterfront housing market'. **(2695 National Grid Property Holdings Ltd)**

Granton Waterfront – EW 2b Central Development Area and 2d North Shore

- Objects to residential use on certain plots in Granton Waterfront. **(1129 AIA Art in Architecture)**
- Amend text for Proposal EW 2b Granton Central Development Area in Table 11 to include two new bullet points: 'protect and enhance the existing open space around Caroline Park' and 'protect and preserve the historic Granton Castle Walled Garden, and make available for community use'. Correct grammatical error in last existing bullet to read ' offer the potential...' **(1783 David Leslie)**
- Amend text and diagrams for Proposals EW 2b and EW 2d in Granton Waterfront in Table 11 as follows:
    - Show the plot immediately north of the 'S' school safeguard as a 'housing-led mixed use development' (plots N and Q in the approved masterplan).
    - Amend boundary of Central Development Area in Table 11, Figure 12 and on the Proposals Map to include a plot in the easternmost part of the North Shore area.
    - Clarify that the North Shore remains available for housing-led mixed use development should the pace of development accelerate.
    - For Proposal EW 2b amend text of 3rd development principle to read 'revise the housing mix towards a greater number of townhouses and houses...' and to clarify status of the masterplan referred to.
    - Provide additional policy emphasis/support for retail and commercial leisure at the former Granton Station site and surrounding land by extending the Local Centre designation.

  Also asks that the Housing Land Audit identify the status of a specific plot in North Shore (site 4792 in the audit) as 'effective'. **(2570 Waterfront Edinburgh Ltd)**
- Amend text for Proposal EW 2b Central Development Area in Table 11 so that final

bullet reads '...new commercial, cultural, tourist...'. Show parts of diagram in Table 11 as 'commercial-led mixed use', on land identified as potential location for the National Collections Facility. **(2679 National Galleries of Scotland (NGS), Royal Commission of the Ancient and Historical Monuments of Scotland (RCAHMS) and Historic Scotland (HS))**

Granton Waterfront – EW 2c Granton Harbour

- Amend text for Proposal EW 2c Granton Harbour in Table 11 as follows:
  - remove first bullet,
  - in second bullet remove 'townhouses' and replace with 'family housing';
  - reword third bullet to read 'meet the convenience shopping needs of new and future residents, visitors and tourists by making provision for local shopping facilities in accordance with the masterplan or subsequent amendments to it'.
  - Amend Proposals Map to replace the specific cycle route and the Local Centre (Proposal S2) symbols with symbols that are not site or route specific. **(2675 Granton Central Developments Ltd.)**
- Amend text for Proposal EW 2c Granton Harbour in Table 11 so that fifth bullet reads: 'provide for retained and improved mooring facilities, and summer and winter dinghy and small craft storage adjacent to the slip way'. **(0124 sportscotland)**
- Amend text for Proposal EW 2c Granton Harbour in Table 11 so that fifth bullet refers to retention of access to slipway on east side of Middle Pier. **(0133 Royal Yachting Association Scotland)**

Policy Del 4 – Edinburgh Waterfront

- Amend Policy Del 4 criterion (d) to clarify that facilities for existing water related recreation are safeguarded. **(0124 sportscotland; 0133 Royal Yachting Association Scotland)**
- Amend Policy Del 4 Edinburgh Waterfront to include a new criterion 'f) the provision of new green spaces and civic spaces'. **(2126 Cockburn Association)**
- Amend wording of Policy Del 4 Edinburgh Waterfront so that the end of criterion e) reads: '...and which connect or have the potential to connect to existing and planned cycle networks.' **(2313 Jeremy Darot)**

WEST EDINBURGH

General

- Remove reference to West Edinburgh Planning Framework and replace with National Planning Framework in paragraph 196 of Policy Emp 4. Remove 'West Edinburgh Planning Framework' and replace with 'National Planning Framework 3' in paragraph 198 of Policy Emp 6. Remove 'West Edinburgh Planning Framework 2008' and replace with 'Edinburgh Airport Masterplan and National Planning Framework 3' in paragraph 197 of Policy Emp 5. **(2088 Scottish Government)**

Edinburgh Airport and Royal Highland Centre

- Amend the text in the first paragraph of Emp 4 to add: 'or complement the

development of the wider area.' **(1023 Edinburgh Airport)**

- Amend the text in Policy Emp 4 to acknowledge that the expansion of the operational area of Edinburgh Airport may also occur to the south of the existing site (towards the A8). Suggests additional text to clarify this requirement: 'Land to the south of the existing airport boundary, currently in use as the Royal Highland Centre, may be required for airport uses in the long term to meet air passenger growth forecasts. Development which would prejudice the long-term expansion of Edinburgh Airport will not be supported, except where it complies with policy Emp 5.' **(2088 Scottish Government)**
- Remove Land East of Ratho Station from the safeguard for the relocation of the Royal Highland Centre and allocate for residential development. **(2275 Murray Estates)**

<u>International Business Gateway</u>

- In Table 4, remove housing allocation from Emp 6 International Business Gateway. **(0698 David Wilson Homes and J & J Muir)**
- Amend the text in Policy Emp 6 IBG to state that housing figures are subject to not exceeding the number of units detailed in the new housing proposals for the area Table 4). **(1023 Edinburgh Airport)**
- Amend text on page 54 as follows:
    - Amend text title to refer to 'Proposal WE 1: International Business Gateway'.
    - Amend Description to incorporate text from page 13 of National Planning Framework 3 as follows: 'West Edinburgh is a significant location for investment, with the airport, the National Showground and the International Business Gateway. Development here will require continued co-ordination and planning to achieve a successful business-led city extension which fulfils its potential for international investment, new jobs and high quality of place.' Include following text in Description: 'Proposal WE1 promotes the delivery of high quality, diverse and sustainable place-making in accordance with the implementation plans of the Edinburgh International Development Partnership to secure a mixed-use business-led International Gateway with housing and ancillary uses, including local centres, learning, hotel and conference facilities.' Retain second sentence of Description.
    - Amend Development Principles to include new first bullet: 'The IBG benefits from un-matched public transport and vehicular access advantages, many of these are already facilities-in-place or committed. Development shall make connections to these major transport corridor benefits.' Amend next bullet to read: 'The IBG must be master planned and developed in a phased manner. Master plans should incorporate an appropriate mix of uses to help support the international attraction of this location.' Amend penultimate bullet to read: '...within 250 metres of tram stops, but market demand and infrastructure/viability requirements might indicate that other early phase site clusters are acceptable...' **(1159 New Ingliston Limited; 2493 IBG Stakeholders)**
- Amend Policy Emp 6 International Business Gateway so that:
    - First sentence reads '...within the WE 1 West Edinburgh Proposals boundary defined...'
    - First bullet reads 'business development as part of a business-led city extension which fulfils its potential for international investment, new jobs and high quality place'.
    - Housing bullet is moved to second position and reads 'housing, integrated with business and other mixed uses'.

- Third existing bullet reads 'Other ancillary uses in accordance with WE 1 and to be agreed through phased masterplans presented in planning permissions in principle' and
- Penultimate sentence refers to '...the WE 1/IBG Development Principles...'.

Revise paragraph 198 as follows:

- first sentence to read: 'The purpose of this policy is to support the development of this nationally important economic and mixed use development opportunity and ensure proposals accord with the National Planning Framework and West Edinburgh Strategic Design Framework.'
- Delete second and third sentences.
- Amend fourth sentence to read: 'Compliance with the West Edinburgh Strategic Design Framework, West Edinburgh Landscape Framework and other relevant plan policies...'

(1159 New Ingliston Limited; 2493 IBG Stakeholders)

- Amend description of International Business Gateway in Table 4 to identify it as 'West Edinburgh 1 Proposal/Emp 6' and to identify estimated capacity as at least 2,350 dwellings in the Plan period. Amend text to refer to 'Housing as a key component of business-led mixed use proposals...' and '...integrated component of business-led master plans brought forward through parameter drawings in phased planning permissions in principle.' and '...Proposals must accord with Proposal WE1, Policy Emp 6 and the IBG Development Principles.' **(1159 New Ingliston Limited)**
- Amend title of inset map on page 55 to read 'West Edinburgh Strategic Design Framework - Planning Authority Approved Guidance'. **(1159 New Ingliston Limited)**
- Amend diagram for International Business Gateway on page 55 to address queries over annotation, scale and route of tram line. **(1170 A.J.C. Clark)**
- Amend Development Principles for of International Business Gateway on page 54 to include a statement that: ' the scale and layout of buildings should respect the architectural and archaeological heritage of Nether Gogar with residential use given preference near Gogar Church and Gogar Mains Fort.' **(1789 Corstorphine Old Parish Church)**
- Review the Development Principles for International Business Gateway on pages 54-55 to: 1)assess the viability of the IBG in light of current/future global economic issues; 2) develop options/scenarios for the land take requirements of different mixes of offices/housing and green space at a range of time scales; 3) devise site briefs for such options; 4) points 1) and 3) may suggest the need to revise the overall design concept of West Edinburgh Strategic Design Framework; 5) if point 4) materialises, consider an international design competition for a West Edinburgh Strategic Development Framework 2, using a holistic range of professional skills e.g. architecture, landscape architecture, ecology, art, etc. **(2126 Cockburn Association)**
- Amend Plan as follows:
  - Amend text for IBG in Table 2 to delete last sentence and add: 'The eastern side of the IBG area should be actively encouraged for residential development, in particular the West Craigs land. There is also the opportunity to promote 1.5 acres of land in the eastern side of IBG for industrial uses.'
  - Amend Policy Emp 6 International Business Gateway to include reference to housing on land in eastern part of IBG.
  - Amend Table 4 to include reference to housing on land in eastern part of International Business Gateway.

  - Amend Development Principles for International Business Gateway on page 54 to include a new bullet point advising that the residential element will be promoted on land in the eastern part of the site and that it will be encouraged to come forward in the Plan period.

(2402 West Craigs Ltd)

- Amend Development Principles for International Business Gateway to refer to the requirement for a flood risk assessment to be carried out to inform the capacity, design and layout of the finalised scheme. **(2699 Scottish Environment Protection Agency)**

Edinburgh Park/South Gyle

- Remove Policy Del 5 Edinburgh Park/South Gyle from Plan. This should be a proposal as it is a stated Council intention towards development of a piece of land. **(0698 David Wilson Homes and J & J Muir)**
- Amend Edinburgh Park/South Gyle diagram on page 57 to clarify how the 'primary pedestrian/cycle route' is intended to cross the dual carriageway at Maybury. **(2048 Duncan Smith)**
- Amend text for Policy Del 5 so that criterion g) reads 'improved pedestrian and cycle links through the site and to provide direct, safe connections with nearby transport hubs and routes to other parts of the city and beyond' **(2697 Scottish Natural Heritage)**
- Amend Development Principles and diagram for Edinburgh Park/South Gyle on pages 56-57 to omit reference to commercial development on Gyle Centre's car parks, or to identify alternative car parking. **(2086 Persimmon Homes (East Scotland))**
- Amend Development Principles for Edinburgh Park/South Gyle to refer to requirement for a flood risk assessment to be carried out to inform the design and layout of the finalised scheme. Consideration should be given to whether there are any culverted watercourses within the site and to pluvial flooding. **(2699 Scottish Environment Protection Agency)**

RBS Gogarburn and related matters

- Amend Figure 1 Spatial Strategy so that red 'Major new development in strategic development area' notation for West Edinburgh takes in the RBS headquarters at Gogarburn. Could also include land at Gogar mount (subject of a separate representation). Amend Figure 1 to also identify RBS headquarters at Gogarburn as an 'employment centre'. **(2572 Royal Bank of Scotland)**
- Amend Figure 13 West Edinburgh overview so that red line boundary either reflects boundary of strategic development area or includes RBS Gogarburn. Include in West Edinburgh section of the Plan a statement of Development Principles for 'Gogar Park', comprising RBS' interests at Gogarburn and Gogarmount. Suggested text and diagram provided. **(2572 Royal Bank of Scotland)**
- Amend the text in Policy Emp 7 by replacing 'existing headquarters' with 'existing function of the site' and remove 'are acceptable in terms of impact on green belt objectives'. Amend Proposals Map to identify land at Gogar Mount as a mixed use development opportunity site. **(2572 Royal Bank of Scotland)**

Infrastructure Matters

- Add a new policy - 'Policy Del 6' - in Part 1 Section 1 to describe an approach to a West Edinburgh infrastructure delivery mechanism. No specific wording or content suggested. **(1159 New Ingliston Limited)**
- Amend paragraph 71 to include additional sentence explaining that any requirement for a new or expanded school will be directly related to a full catchment review at the time of the housing coming forward. Amend text for Proposal SCH 6 Maybury in Table 6 to advise that the provision of a new primary school will be on the basis that there is full and up to date capacity information provided. Any school provision will only be necessary whereby there is a need resulting from the proposed development. **(2402 West Craigs Ltd)**
- Amend text in Table 9 as follows.:
    - Add text for T2 to read: 'The provision of the new rail station at Gogar should advance the land for development to the west and north owned by West Craigs Ltd.'
    - Add text to T9 to read: 'No work at Eastfield Road/dumbbells is required to access the land west of the tram depot in West Craig's ownership.'
    - Amend text for T10 to omit reference to the Gogar Link Road being bus/cycle/pedestrian only. The Council has already granted West Craigs unfettered access rights on their retained land via the tram depot compromise agreement.
    - Amend T13 to state that it is not required for development of West Craigs Ltd land within the IBG.
    - Add text to T17 and T18 to read: 'Any requirement for mitigation on this junction is linked only to the new housing development in respect of developers contributions.' **(2402 West Craigs Ltd)**
- Amend paragraph 50 to include a new bullet: ' Where CEC has failed to make provision for connectivity between key land holdings for green corridors via existing planning consents (e.g. Gogar rail station), it will ensure that all parties who would benefit from such connectivity will contribute (including the Council), not just immediately adjacent landowners, and the Council will adopted any railway bridge structures offered to them as part of such connectivity.' **(2402 West Craigs Ltd)**

Other Matters

- Amend paragraph 88 to include additional sentence: 'Wind turbines are not possible due to proximity to the airport, any development within West Edinburgh should be exempt from complying with the full Sec 6 (Energy) of the Scotland Building Standards.' **(2402 West Craigs Ltd)**

Summary of responses (including reasons) by planning authority:

CITYCENTRE

Proposal CC 1 – St James

- No modification proposed, however the Council sees merit in updating the title of Proposal CC 1 to 'Edinburgh St James'. There is not a need to refer to the Picardy Place Development Principles in the Plan. Their focus lies outwith the boundary of Proposal CC1 1. They retain their status as non-statutory guidance of the type

covered generally by paragraph 10 and used to interpret policies Del 3 and Des 2. **(2268 TIAA Henderson Real Estates)**

- The detailed design and layout of the redevelopment of the St James Centre is not able to provide a normal cycle route directly through the site to Picardy Place because of the level changes within the site. **(2341 New Town & Broughton Community Council)**

Proposal CC 2 – New Street

- Table 10 and Policy Del 3 make sufficient provision for a wide range of uses in Proposal CC 2. The precise balance is a matter for the consideration of planning applications. No modification proposed. **(2098 Artisan REI)**

Proposal CC 3 – Fountainbridge

- The identification in Table 10's diagram of 'Housing-led mixed use development' blocks is necessary to ensure that Fountainbridge's contribution to meeting the Plan's housing land requirement is maintained (See Table 3). No modification proposed, however it is acknowledged that since the Second Proposed Plan was prepared, more detailed proposals have been approved for the area south of Dundee St/Fountainbridge, and that the diagram could be revised to identify parts of that area 'housing-led mixed use development' blocks, thereby bringing greater consistency to the diagram as a whole. **(2497 Grosvenor)**
- The identification of the small plot adjacent to 36 Morrison Crescent is consistent with the approved Fountainbridge Development Brief. No modification proposed **(2664 Amanda Hutcheson).**
- The Plan's text and diagram already identifies the potential new links which development can create. Pedestrian/cycle routes into the city centre and financial district are already identified or established. Surface water management is addressed by the Plan in Policies Des 6 and Env 21 and 22. Site specific solutions making use of features such as the canal can be identified on a case-by-case basis. No modification proposed. **(2702 Scottish Canals)**

Other Sites

- The Plan does not seek to allocate as proposal all the development opportunities in the city centre. To do so would lengthen the Plan unnecessarily. It would also unnecessarily set development plan provisions which could not be updated rapidly should circumstances require. Instead, the Plan reserves that approach for only the four biggest development areas. Elsewhere, Policy Del 3 and other relevant policies set criteria which can inform redevelopment. Where appropriate, the Council has prepared flexible, non-statutory guidance to assist interpretation of the Plan and placemaking. Proposals for Dewar Place can be assessed using relevant policies and the site's non-statutory guidance. The site is also identified in Figure 11 and paragraph 106 for the benefit of the general reader who wishes to get an overview of change anticipated in the city centre. 36 St Andrew's Square and the 'Registers Lane' area is covered in the Plan by the City Centre Retail Core. Policy Ret 1 provides sufficient guidance. No modification proposed. **(2460 Scottish Power; 2572 Royal Bank of Scotland)**

Policy Del 3 – City Centre

- Criterion c) of this policy specifically seeks new office provision where practicable to help address a particular issue raised in the Main Issues Report (see Question 10 and related text). The concern is that due to physical and environmental constraints, the city centre has relatively few opportunities to meet demand for new Grade A office space. The Plan seeks to ensure that opportunities to meet some of that demand are not lost. This is a less prescriptive approach than that outlined in the Main Issues Report, but is still necessary (See Schedule of Consultation Responses, March 2013, Question 10). Residential development is supported generally in the city centre, but does not have the same particular locational need as prime Grade A offices. **(2126 Cockburn Association; 2497 Grosvenor)**

EDINBURGH WATERFRONT

Edinburgh Waterfront - General

- The Plan supports the Council's Local Transport Strategy as explained in pages 33-36. This includes, where appropriate, specific transport proposals and safeguards as set out in Table 9. These include several interventions for north Edinburgh. Further detail will be provided as appropriate in the LDP's Action Programme, to be updated annually. Transport interventions relating to individual development applications can be identified outwith the Plan and its Action Programme. No modification proposed. **(0520 Trinity Community Council)**
- The Plan's statements on identified demand for large-scale industrial uses in Granton and Central and Western Leith are based on the evidence of the last 15 years development activity and on the findings of the SESplan Economy Technical Note (November 2011, pages 7 and 22). This can be contrasted with the northern and eastern docks in Leith, where the National Renewables Infrastructure Plan provides evidence of a need of land for new large-scale industrial. No modification proposed. **(1170 A.J.C. Clark)**

Edinburgh Waterfront – Housing Capacity

- Edinburgh's waterfront is identified as a priority location for new homes and regeneration in the National Planning Framework 3 (page 13) and the SDP (see for example paragraph 34 and Figure 3). In preparing the LDP the Council has reviewed its land use designations for both major development areas in the waterfront (i.e. Leith and Granton) and made significant changes. The total physical housing capacity has been reduced from the 28,500 units indicated in the SDP to the overall total of 16,100 identified for Leith and Granton in Table 3. The Plan continues to seek relatively high densities of development. This is appropriate for these locations, which are well served by public transport (see National Planning Framework paragraph 2.20 and Scottish Planning Policy paragraph 40). It also reflects the household type projections which underpin the SDP's housing need and demand calculations (see LDP Housing Land Study Figure 2, which shows the fastest growth as being for smaller households, likely to occupy flatted development). However, the LDP also acknowledges a shift in the mix of house types from that previously envisaged may be appropriate for some areas in the Waterfront. The LDP offsets the likely implications for density by providing more land for housing in Granton, released by the removal of a strategic business centre designation (see Main Issues Report Question 10 for

background).
Only a portion of the new, lower total capacity of 16,100 units is likely to deliver completions within the Plan period. The LDP Housing Land Study (June 2014) shows the programming assumptions of the 2013 Housing Land Audit. For the sites in the Waterfront, these amount to an estimate of around 4,000 completions from 2013 to 2024 (see Appendix to this Schedule for relevant extract). These are realistic assumptions, borne out by the renewed masterplanning and application activity. This includes work referred to by other representations, for example that from National Grid Property Holdings Ltd (02695), and pending applications, for example a site within the Central Leith Waterfront EW 1b allocation at the end of Constitution Street (reference 14/05127/FUL).

The housing capacities set out in Table 3 for Edinburgh Waterfront are supported by the SDP and national policy and have been counted as making realistic contributions to meeting overall housing land requirements.

No modification proposed. **(0698 David Wilson Homes and J & J Muir; 2086 Persimmon Homes (East Scotland); 2276 Gladman Developments Ltd; 2402 West Craigs Ltd; 2290 Edinburgh Developers' Group (Edinburgh Chamber of Commerce))**

Edinburgh Waterfront – Flood Risk Assessments

- The issue of flood risk for all developments, not just LDP proposals, is addressed through Policy Env 21. Extant planning permissions have identified flood risk where relevant and identified mitigation measures. No modification proposed. **(2699 Scottish Environment Protection Agency)**

Leith Waterfront – Overall land use strategy

- The Plan has revised significantly the Council's land use designations for Leith Waterfront, in response to national policy and discussions with Forth Ports Ltd. It makes appropriate provision in terms of designation of Business and Industrial Area policy adjacent to working docks (in EW 1e) and general industrial land nearby in Seafield (EW 1d).

  The Special Economic Area also applies to the former in accordance with SDP paragraph 36 and Policy 10 part a). It also reflects the reference to the Low Carbon/Renewables East Enterprise Area on page 14 of the National Planning Framework 3. Permitted development rights allow port-related uses to take place without planning permission. The development plan designation therefore does not constrain the port-related role. It is only any non-port related industrial and storage development which would need to apply for planning permission and hence is constrained by the current LDP designation.

  The more general designation at Seafield (EW 1d) covers land in several ownerships and reflects its physical separation by Albert Road from the main docks area. It would be inappropriate to identify it as part of the Special Economic Area. Together, these two designations (EW 1 d & e) provide for significant levels of new industrial and port-related employment development in Leith Waterfront.

  The Plan includes the land west of Ocean Terminal ('Britannia Quay') and south of

Edinburgh Dock in the mixed use allocation in Central Leith Waterfront (EW 1b). This is consistent with the strategy for Leith Waterfront agreed with Forth Ports Ltd at the Main Issues Report stage (see Main Issues Report Question 6, Summary of Consultation Responses pages 20-21, Summary of Leith Workshop (18 January 2012) and Main Issues Report response from Forth Ports Ltd). The allocation is also consistent with assumptions that can be taken from consideration of the SDP. Those are that high household growth projections will be accompanied by economic recovery and that, in that context, high density housing-led brownfield regeneration will become economically attractive in locations with good access to services and existing and planned infrastructure (SDP paragraphs 24-27 and the sections referred to above in response to reps on Housing Capacity). Planned infrastructure includes the realisation of the tram route to Leith, which is currently the subject of renewed consideration (see Report to Full Council, 11 December 2014).

The areas are adjacent to existing residential development (e.g. at Britannia Quay) and planned developments (at North Leith Sands, Constitution Street, North of Salamander Street and east of Bath Road), where the Edinburgh City Local Plan supports residential development and the provisions of the non-statutory Leith Docks Development Framework (2005 e.g. pages 103, 115 and 117) are still relevant and reflected in the block layout indicated in Table 10. Their development would be affected by the proposed changes.

The area south of Edinburgh Dock is cut across by a safeguard for a new road (Proposal T15) which will leave a plot of land separated from the main docks area and adjacent to plots in other ownership expected to be developed for housing. It is appropriate that the line of the proposed new road form the southern boundary of the Business and Industry area in this location.

In summary, re-designation of either of these sites from housing to industry would not be consistent with the land use strategy for Leith, would introduce potential amenity conflicts with nearby existing and planned housing and is not necessary to support the role of the Port as described in the SDP and national policy. No modification proposed. **(1506 Forth Ports Limited; 2124 Edinburgh Chamber of Commerce)**

<u>Leith Waterfront – EW 1b Central Leith Waterfront</u>

- The approved layout and perimeter block urban form for area EW1b are based on sound urban design and placemaking principles. They arise from the Leith Docks Development Framework (2005). There is no justification at this time to deviate from this approach. **(2173 K J Wilson; 2517 Britannia Quay Proprietors Association (BQPA)).**

<u>Leith Waterfront – EW 1c Salamander Place</u>

- In Proposal EW1c, the Plan allows housing development and greenspace to come forward as proposals as business and industrial units reach the end of their design lives. Replacement space can be provided in designated Business and Industrial Areas and through implementation of the Employment Sites and Premises Policy Emp 9. It is not the Council's intention to intervene to lose business / industrial units currently in use. **(1968 George Nicolson (Decorators) Ltd)**

Leith Waterfront – EW 1d Seafield and 1e Northern and Eastern Docks

- Policy RS 1 applies to any planning applications for sustainable energy generation, including those types identified in Table 11 and Policy RS 3 as potentially suitable for location in Seafield (EW 1d). Policy RS 1 provides general protection for the local environment and amenity of neighbouring occupiers. Its supporting paragraph 278 cross refers to Policy Env 22 as being used to assess impact on air quality. No modification proposed. **(0432 Greener Leith; 1660 Adrian Graham; 2313 Jeremy Darot; 2687 Leith Central Community Council).**
- The proposed wording would be incompatible with the Business and Industry Area designation for this area. The review of policy designations is carried out with the preparation of each Main Issues Report and Monitoring Statements with each plan generation. No Modification Proposed. **(2126 Cockburn Association)**
- The reason given in the current wording is a reasonable one which arises from concerns raised in Main Issues Report consultation process about the tourism industry in Leith (see Leith Workshop Summary, 18 January 2012 page 2. It is also consistent with the identification of Leith in Policies Del 4 and Ret 6 as a location for new entertainment and leisure uses. The current wording is proportionate. No modification proposed. **(2683 Scottish Enterprise)**

Leith Waterfront – Greenspace

- Proposal GS 2 is for the creation of a new 5 hectare greenspace, which is typical for a community park. Its size and extent have been designed as part of the masterplanning process for the Western Harbour. The masterplan is partly implemented and should not be changed significantly at this stage. No modification proposed. **(2173 K J Wilson; 2517 Britannia Quay Proprietors Association (BQPA))**
- The LDP includes two proposals for new large greenspaces in Leith – GS 2 and GS 3. These have been identified through masterplanning processes. They will address existing deficiencies in terms of the Council's Large Greenspace Standard for the large areas of change where the opportunity to do so exists. No such opportunities exist in the Central Leith Waterfront area. The suggested site has been the subject of planning permission for housing development for several years and is now under construction. No modification proposed. **(0432 Greener Leith; 1660 Adrian Graham; 2687 Leith Central Community Council)**
- Proposal GS 3 has been reduced in area from the proposal in the Edinburgh City Local Plan to reflect the change in the extent of the housing-led mixed-use designation in the northern and eastern docks. The revised area retains the potential for a pedestrian/cycle route connection to the accessible part of the proposed coastal footpath route, through land made available for redevelopment. Both the park and cycleway are likely to be delivered in phases, as redevelopment proposals come forward. **(0432 Greener Leith; 1660 Adrian Graham; 2687 Leith Central Community Council; 1968 George Nicolson (Decorators) Ltd)**

Granton Waterfront – EW 2a Forth Quarter

- No modification proposed. The current wording is intended to confirm that the housing mix for new development in this area can include a shift towards more houses than was included in the masterplan approved before the LDP's preparation if this would assist earlier delivery. This was an issue raised in the

Main Issues Report (Question 5). The use of the term 'townhouses' is intended to indicate that despite the envisaged shift in mix, a relatively high density of development is still expected. Such a density is appropriate to this location and the household projections which underlie the SDP (see response on Housing Capacity matters above). It is acknowledged that the term 'townhouses' is not precise, and that 'terraced houses' would be a more generally understood term. **(2695 National Grid Property Holdings Ltd)**

Granton Waterfront – EW 2b Central Development Area and 2d North Shore

- The diagram in Table 11 is indicative of the perimeter block urban form the Council expects development to provide here. The diagram omits some smaller plots for simplicity, however these have been identified for residential development in the approved masterplan for the central development area. No modification proposed, however the Council acknowledges that the identification of the relevant plots (N and Q) would reflect the masterplan, despite the open space designation and aspiration for alternative uses. The Council also acknowledges the need for grammatical correction in the final bullet of EW 2b. **(1129 AIA Art in Architecture; 1783 David Leslie; 2570 Waterfront Edinburgh Ltd (part))**
  The boundaries of EW 2b and 2d as identified on the Proposals Map reflect those of the masterplans for the relevant areas. It is not necessary to change them on the basis that a plot in the North Shore area may be available for residential development sooner than anticipated for the area as a whole. No modification proposed, however it is acknowledged that the Plan still supports the principle of residential development in the North Shore area and that, to reflect this, its description in the Key for Table 11 could be amended to read 'Temporary Light Industrial Uses and Housing' rather than the misleading 'Business and Industry Area'. It should be noted that the Housing Land Audit is updated annually, and is not a provision of the LDP.

  It is acknowledged that the term 'townhouses' is not precise, and that 'terraced houses' would be a more generally understood term. Reference to 'site briefs' in paragraph 134 is to the development principles in Table 11. Reference to 'approved masterplans' is to those attached to outline permissions which pre-date the LDP's preparation.

  The extent of the local centre identified on the Proposals Map is appropriate for its local retail purpose. Local centres are intended to make basic convenience provision within walking distance of most homes (see objectives for Part 2 Section 6 of the Plan). Policies Ret 4 and 6 provide sufficient context to assess any future proposals for retail or commercial leisure here, including their impact on the city centre or other relevant centres. No modification proposed. **(2570 Waterfront Edinburgh Ltd)**
- No modification proposed, however the Council acknowledges that the representees' cultural proposal has unique potential to contribute to the regeneration aims for Granton and the cultural assets of the city. The text change sought could therefore be appropriate. Identification in Table 11's diagram of the relevant blocks as a new colour (e.g. orange) with the Key description 'Cultural use or housing-led regeneration' would be an appropriate reflection of this opportunity. **(2679 National Galleries of Scotland (NGS), Royal Commission of the Ancient and Historical Monuments of Scotland (RCAHMS) and Historic Scotland (HS))**

Granton Waterfront – EW 2c Granton Harbour

- The Plan sets a framework intended to ensure that the placemaking opportunities of the Waterfront are not missed by new development and that the other objectives of the Plan are not prejudiced. This framework includes:
  - The description of the urban form sought by the Council.
  - The identification of a local centre for the purpose and of the form envisaged by the Council.
  - Relevant sections of the coastal walkway project referred to in paragraphs 49 and Figure 9/Table 9.

  This approach is supported by Scottish Planning Policy's Principal Policy on Placemaking, which expects a design-led approach to be taken at all levels and at every opportunity. It is also consistent with the outline planning permission for Granton Harbour (01/00802/OUT) and the current masterplan approved in January 2014. No modification proposed, however it is acknowledged that the term 'townhouses' is not precise, and that 'terraced houses' would be a more generally understood term. **(2675 Granton Central Developments Ltd.)**
- The current wording regarding water-based recreation is appropriate and should be taken to mean protection of access to the slipway of Middle Pier and appropriately sited storage. No modification proposed. **(0124 sportscotland; 0133 Royal Yachting Association Scotland)**

Policy Del 4 – Edinburgh Waterfront

- Policy Del 4 should not be read in isolation from Tables 10 or 11 or other provisions of the Plan. The current wording is adequate for the purposes of determining planning applications. The changes sought would add unnecessary repetition of detail. No modification proposed.**(0124 sportscotland; 0133 Royal Yachting Association Scotland; 2126 Cockburn Association; 2313 Jeremy Darot)**

WEST EDINBURGH

General

- No modification proposed, however the Council sees merit in this representation to remove reference to West Edinburgh Planning Framework and replace with National Planning Framework 3 in paragraph 196 of Policy Emp 4 and paragraph 198 of Policy Emp 6 and replace with 'Edinburgh Airport Masterplan and National Planning Framework 3' in paragraph 197. **(2088 Scottish Government)**

Edinburgh Airport and Royal Highland Centre

- Policy Emp 10 provides adequate support for the principle of hotel development in this location. Other supporting uses can be considered on their merits using Policy Emp 4 as written. No modification proposed. **(1023 Edinburgh Airport)**
- The land in question is identified on the Proposals Map as covered by Policy Emp 5. This policy and its supporting paragraph 197 explain the explain the role of this land in the future expansion of the airport and safeguard. It would not be logical to set this out in the policy which relates to a different area of land. No modification proposed. **(2088 Scottish Government)**

- The National Planning Framework 3 makes clear the continuing need to safeguard the land south of the A8 for the potential relocation of the Royal Highland Centre to allow for future expansion of Edinburgh Airport. No modification proposed. **(2275 Murray Estates)**

International Business Gateway

- No modification proposed. The main purpose of the International Business Gateway is an economic and employment one. The plan's current policy title, description and development principles are therefore appropriate in their emphasis. The Plan's current wording also provides sufficient flexibility on matters such as phasing. Proposals for further education uses can be assessed on their merits. However, it is acknowledged that the National Planning Framework 3 promotes mixed uses here and diverse high quality and sustainable places generally. It is also acknowledged that the housing capacity currently identified in Table 4 is relatively low for a new urban extension and that the design parameters of the West Edinburgh Strategic Design Framework could potentially allow a larger amount of housing to be accommodated without prejudicing the retention of sufficient land for office and other uses. This could provide additional housing capacity to help meet the overall housing requirement in a location which would not alter the Plan's spatial strategy or further loss of green belt, and provide a greater critical mass to support placemaking objectives. The exact level is unlikely to be as high as that identified in representations. It is also acknowledged that the diagram on page 55 is inconsistent with others in the Plan and could be amended to indicate which blocks are suited for housing-led mixed use development, and which ones for business-led development or general mixed-use development. This would provide greater certainty on both the provision of housing land and commercial land in this location. A more up-to-date version (May 2015) of what that diagram might show is provided as one of the Council's submissions. **(0698 David Wilson Homes and J & J Muir; 1023 Edinburgh Airport; 1159 New Ingliston Limited; 2493 IBG Stakeholders; 1170 A.J.C. Clark)**
- The Plan has separate policies which protect built heritage and archaeological remains. Those provisions do not need to be repeated in this section. No modification proposed. **(1789 Corstorphine Old Parish Church)**
- The national context for the International Business Gateway has been reaffirmed by the Scottish Government in the National Planning Framework 3 and Chief Planner's letter on the withdrawal of the West Edinburgh Planning Framework. The West Edinburgh Strategic Design Framework sets an urban block layout which is adaptable to a range of uses – one of the qualities of successful places identified in Scottish Planning Policy (paragraph 44). Flexibility to accommodate changing circumstances in terms of uses means it does not need to be revised at this time. No modification proposed. **(2126 Cockburn Association)**
- The current wording of the Plan is appropriate in terms of its support for housing as part of mixed use masterplans to be brought forward for assessment. General industrial uses are supported by the Plan in designated large-scale Business and Industry Areas. No modification proposed. **(2402 West Craigs Ltd)**
- The Proposals Map identified the Area of Importance for Flood Management here and the West Edinburgh Landscape Framework proposes new greenspace to accommodate that flood management function. This is consistent with Scottish Planning Policy statements on green infrastructure in paragraph 262. Policy Env 21 provides general requirement for proposals to avoid flood risk. No modification proposed. **(2699 Scottish Environment Protection Agency)**

Edinburgh Park/South Gyle

- This area consists of undeveloped plots, recent built development, previously developed land and older industrial and storage buildings which may come forward for redevelopment in the foreseeable future. The Council wishes to establish common principle and coordinate change across this complex area. As with the waterfront, it is appropriate to set out a policy to achieve these aims, rather than one or more proposals. No modification proposed. **(0698 David Wilson Homes and J & J Muir)**
- The route is intended to make use of the underpass to be created as part of the Edinburgh Gateway railway station project currently under construction. No modification proposed. **(2048 Duncan Smith)**
- This policy can only be expected to guide the layout of development within the Edinburgh Park/South Gyle area. Where active travel connections lie outwith the area, Policies Des 7 criterion f) and, where applicable, Tra 8 apply. No modification proposed. **(2697 Scottish Natural Heritage)**
- The Plan's development principles identify how further development at The Gyle, if acceptable in terms of the Plan's policies on retail, leisure, office and other development can be provided. This should be in a more compact, resource efficient form than the low intensity, car park-dominated layout that exists. This is appropriate for a location with an evolving transportation and land use context, and supported by principles in Scottish Planning Policy (e.g. paragraphs 40, 45 and 46). Appropriate parking provision will still be required, but could be in more land efficient forms, such as multi-level parking. It should be noted that no other representations have been received raising this concern from the Gyle Centre's owners or commercial tenants. No modification proposed. **(2086 Persimmon Homes (East Scotland))**
- Policy Env 21 provides general requirement for proposals to avoid flood risk. No modification proposed. **(2699 Scottish Environment Protection Agency)**

RBS Gogarburn and related matters

- Figure 1 spatial strategy is intended to summarise the Council's vision for the shape of the city as it grows. This includes identifying clear urban edges. In Issue 2 the Council gives its reasons for keeping the site in the green belt designation but making positive provision for development through Policy Emp 7. Accordingly, it is appropriate that Figure 1 continue to reflect this approach. The Council has in the Second Proposed Plan amended Figure 13 to give due prominence to the RBS Headquarters. Change to the red line here would introduce confusion with the red area shown in Figure 1. Introduction of development principles for the RBS Headquarters to the Plan is unnecessary. Policy Emp 7 provides sufficient site specific guidance, and the extant permission provides for further development here.

  The Council responds to a representation seeking removal of the RBS Headquarters site from the Green Belt in Issue 2, explaining why the site should remain in the green belt. The text in Policy Emp 7 regarding the impact on green belt objectives is therefore necessary to ensure that development proposals will not jeopardise the long term, defensible green belt boundary at this location, as required by Scottish Planning Policy paragraph 51. The text reference to the existing function of the site reflects its current use and the reason for its existence in this location.

The Council responds to a representation seeking removal of the RBS Headquarters site from the Green Belt in Issue 2, explaining why the site should remain in the green belt.

No modification proposed. **(2572 Royal Bank of Scotland)**

Infrastructure Matters

- The Council responds to the request for an additional Policy Del 6 under Issue 21. **(1159 New Ingliston Limited)**
- The infrastructure requirements for West Edinburgh have been identified through the two transport studies – the West Edinburgh Transport Appraisal and the LDP Transport Appraisal – and the LDP Revised Education Appraisal. They are identified in the Plan as appropriate, and in the Second Proposed Action Programme. The Council will seek provision of infrastructure measures within relevant development sites and through financial contributions where necessary. In both cases, it will do so in line with the tests set in national guidance, as covered under Issue 21. The changes sought are unnecessarily detailed, relate to matters which will be addressed in the determination of planning applications and seek to undermine some of the principles identified in the previous planning and transport studies for the area. No modification proposed. **(2402 West Craigs Ltd)**

Other Matters

- Policy Des 6 sets out the requirements for new development to include carbon reduction measures, in line with the Climate Change Act and building standards. The Policy does not, however, prescribe what efficiency measures and low and zero carbon generating technologies should be used to meet the requirements. Proposals should be designed and developed to meet the standards taking account of local constraints and opportunities. There is no justification to relax the requirements of buildings standards because one particular generating technology may be constrained. No modification proposed. **(2402 West Craigs Ltd)**

Reporter's conclusions:

CITY CENTRE

Proposal CC 1 – St James

1. It is appropriate to change the name of the shopping mall in Proposal CC 1 in Table 10 to that which is sought within the representation. The Picardy Place Development Principles appears to be non-statutory guidance which has its focus outside the boundary of Proposal CC 1, and in any event it would not be appropriate to refer to non-statutory guidance within the development principles of Proposal CC 1 in a manner which might be seen to elevate the status of such guidance to being part of the development plan, which it is not. In any event, it is guidance which is already available to assist in interpreting relevant policies of the local development plan, and would be a material consideration with respect to any planning application for development.

2. The penultimate bullet point of the development principles for Proposal CC 1 refers to a new civic space and pedestrian routes to strengthen links with the surrounding area, but

it does not make reference to any integrated cycle path as part of that provision. The council has indicated that there are difficulties in providing a cycle route owing to changes in levels on the site. I consider that it has not been demonstrated that such a cycle route would be achievable, and I therefore find that it would not be appropriate to change the bullet point to include cycle provision and Picardy Place. Other than the name of the shopping mall relating to Proposal CC 1, no changes are required.

Proposal CC 2 – New Street

3. The development principles for Proposal CC 2 state that proposals will be expected to provide (in the first bullet point) a mix of uses including housing, offices, small business units, hotels, shops (including a small supermarket), food and drink premises and community facilities. I consider that this is therefore a wide ranging mixed use proposal based on those uses, but which does not exclude other specific uses which may be compatible with the use and character of the area. The council is correct to state that the precise mix of uses is a matter for consideration within planning applications. Including any text which undermines an already long list of what could be described as preferred uses would also undermine the clarity of the first bullet point, thus making the development principles less effective. As far as development principles go, I find that there is as much flexibility as could reasonably be expected for such a proposal, and that therefore no change is required.

Proposal CC 3 – Fountainbridge

4. The development principles for Proposal CC 3 state (in the first bullet point) that proposals will be expected to provide mixed use development including a local centre, residential, office, small business units, retail, leisure, community and tourist/visitor facilities. However, whereas Proposals CC 1 and CC 2 identify mixed use development as being commercial led development, the diagram distinguishes between commercial led and housing led mixed use development, thus providing a different emphasis on the expected primary or majority use within these areas.

5. I note that there are still some 640 houses to be delivered through this proposal (Table 3), and I therefore recognise that some of the mixed use areas require to be housing led. It would be inappropriate to simply refer to all development as mixed use within the diagram. However, there is no reasoning provided within the development principles or the supporting information to indicate how the housing led areas have been chosen. I note from the council's response to a further information request that the diagram in the proposed plan follows on from the 2 development briefs that have already been approved, but that it also reflects a masterplan for which planning permission was granted in 2011. There is also a new secondary school under construction which is reflected in the diagram. However, the council has stated above that parts of the area to the south of Dundee Street and Fountainbridge could be identified as housing led, which would reduce the pressure on the contribution the northern area would require to make.

6. From my site inspection, the canal is clearly an integral feature of this redevelopment site. From the crossing of the canal at Gilmore Park, I note that housing development has already been implemented at Leamington Wharf, and that this uses the canal as a feature which is accessible to the housing development. To the north of the canal and up to Dundee Street, there are large areas of vacant land, following the clearance of previous development on the site. This is shown in the diagram as an area for commercial led mixed use development. However, I consider that there is an opportunity

to provide for housing led development in the area to the south of Dundee Street, which can also make appropriate use of the canal as a feature of the development.

7. The development principles for Fountainbridge set out a flexible development framework rather than rigid land use allocations, and it appears to me that this is the correct approach. The key should be on placemaking and the provision of a suitable environment for either residential or commercial development where this occurs. The council has however now indicated (in its response to the further information request) that a new masterplan for the central portion of the area south of Fountainbridge has been considered and has minded to grant status. A copy of the masterplan is provided for information, and I find that this provides an appropriate framework for residential and commercial development in the area, commensurate with placemaking principles.

8. I note that the response on behalf of the party making the representation on this matter also provides a detailed plan showing the latest proposals for the area to the north of Fountainbridge, and I am satisfied that these would remain in accordance with the development principles. However, I agree that the diagram is indicative, and that it is important to retain the note on the diagram which states “indicative – not part of the proposals map”. This will be retained since there is no representation seeking otherwise. I find that it would therefore be appropriate to update the diagram in Table 10 in order to reflect the layout of the latest approved masterplan for the area to the south of Fountainbridge. However, I agree with the council’s position that this does not require any alteration of the contribution of the site to the housing land supply.

9. A representation seeks the removal of the small area of housing led mixed use development on the north side of the western approach road from the diagram supporting the development principles. I have viewed the site and note that it is a relatively small grassed area of open space adjacent to an existing 4 storey block of flats to the east. There is also a row of 4 storey tenements to the north of the site, separated by a stone wall. Both the block of flats and the tenements have windows which overlook the site, and this creates a challenging scenario for the design of an appropriate development which would maintain the character of the area and at the same time retain the residential amenity of the existing housing. I note that outline planning permission for housing has been granted and that development of the site for housing would accord with the Fountainbridge development brief. However, reserved matters for a five storey block of flats has been refused and dismissed on appeal owing to the adverse effect on the character and appearance of the surrounding area and privacy of neighbours.

10. Nevertheless, I find that it remains appropriate in the circumstances to retain the site for mixed use housing led development in the local development plan. Whilst there are clearly inherent difficulties in the development of the site for housing, the development of the site has been found to be acceptable in principle, and I do not disagree with that assessment. I consider that the matters of concern within the representation would be more appropriately addressed through the development management process. Where proposals are unacceptable in terms of their impact on the character and residential amenity of the area, planning permission would be refused. In the event that no housing development scheme is found to be appropriate, the area could simply be retained as informal open space without significantly undermining the development principles.

11. Scottish Canals seeks two additional bullet points, the first on improving links to the city centre and the second seeking contributions to canal improvements, and exploring the opportunities for surface water discharge to the canal. The third bullet point within the

development principles expects proposals to improve north-south linkages, and in particular provide a strong pedestrian/cycle link to Haymarket that reduces the barrier effect of the western approach road. In addition the diagram shows a new safeguarded cycle/footpath route through the site. I therefore find that links between the site and the city centre and financial district would be improved.

12. I also find that the issue of surface water drainage could be satisfactorily addressed within individual development proposals, which could take into account the possibility of surface water drainage to the canal. Where there is a need for developer contributions towards any specific canal improvement (resulting directly from a net impact on infrastructure capacity) this should be considered in the context of Policy Del 1. It is not necessary to refer to these matters within the development principles. However, the canal running along the southern boundary of Proposal CC 3 is a water feature which potentially is of significant benefit to new development in the area. This is already recognised to some extent in the fifth bullet point, but this should be further expanded to encourage development proposals to maximise the use, physical appearance and condition of the canal.

13. In overall terms I conclude that the diagram for Fountainbridge in Table 10 should be amended in order to reflect the layout of the latest approved masterplan for the area to the south of Fountainbridge, and to encourage development proposals to maximise the use, physical appearance and condition of the canal. I conclude that no other changes are required, and that the small area of open space on the north side of the western approach road should remain designated for housing led mixed use development.

Other Sites

14. A major redevelopment site at Dewar Place is referred to in paragraph 106 of the local development plan, and the site is shown on Figure 11 (city centre overview map). However, the site is not identified as a major opportunity for development in the city centre in Table 10. A masterplan was approved by the council in 2010 which shows the development of a new sub-station on the site, and the potential for major multi-storey office, hotel, residential, retail and leisure development. The representation on this matter seeks the inclusion of the site as a development proposal in Table 10 (with development principles formalising the approved masterplan) and on the proposals map.

15. I am a little surprised that this development proposal has not been included within Table 10, given the extensive nature of the development proposed, and the complexity of the approved masterplan. Although the site is relatively small, the intensive nature of the multi-storey development proposed therein appears to be significant. I recognise that incorporating key development principles into the development plan reduces flexibility because of the inability to update these regularly. However, it appears to me that the redevelopment proposed for this site would justify development plan status as a specific proposal, rather than simply being considered in the context of Policy Del 3.

16. Notwithstanding the above, I do not have the benefit of direct comparison of the scale of development on this site with the 4 development sites already included in Table 10, and the council considers it to be of a lesser scale. A cut-off point is clearly required somewhere, and whilst I recognise that there is a case for inclusion, in the context of paragraph 117 of Circular 6/2013 I do not consider there to be sufficient justification for a recommendation to the council that this development site should be included in Table 10. I am satisfied in the circumstances that any proposed development on this site should be

progressed through the development management process in the context of Policy Del 3, and I conclude that no modification to the proposed plan is required.

17. It is also suggested that a contradiction needs to be resolved in the text of paragraph 106, which refers to proposals at Dewar Place being assessed in the context of Policy Del 3. However, there is no conflict because Dewar Place lies within the city centre, where any proposal for development would fall to be considered under Policy Del 3. This policy does not just apply to proposals in Table 10. Indeed, it can be argued that Policy Del 3 is more applicable to proposals not included in Table 10, because they do not have the benefit of stated development principles within Table 10. It may be the case that Policy Del 3 has been misinterpreted owing to the wording in line 1 of the policy, where "development in the city centre as defined on the proposal map" may be taken to only relate to the proposals in Table 10 which are shown on the proposals map. This is clearly not the intention, so I conclude that this should be clarified to refer to development which lies within the area of the city centre as shown on the proposals map.

18. With respect to the land at St Andrew's Square and Registers Lane, this lies within the city centre retail core, and Policies Ret 1 and Del 3 apply. I note the representation to the effect that discussions have been held with the council about the development potential within this area, and following a further information request the council has confirmed that there are 3 potential development proposals within this area (one of which is minded to grant full planning permission by the council), but that with respect to the land owned by the Royal Bank of Scotland, no formal pre-application proposals have been received or discussed.

19. I also note all of the complementary information provided on behalf of the Royal Bank of Scotland, to the effect that informal discussions are ongoing with the council and other parties with respect to further potential development in the area. The final sentence of paragraph 106 may be relevant in this context. This states that the cumulative effect of a number of smaller developments could bring significant benefits for the city centre and Edinburgh as a whole, which provides general support for such proposals which are not specifically included in the local development plan. However, I find that there is insufficient evidence to suggest that discussions have progressed to an extent where it would be appropriate to refer to potential development in the area in the terms sought in the representation, and I conclude that no change to the plan is required.

Policy Del 3 – City Centre

20. In Policy Del 3 the only reference to offices is within line 1 of criterion c), and paragraph 133 explains that, owing to the demand for office space in the city centre and the importance of office jobs to the economy, the policy requires office provision to be included in major mixed use development proposals wherever possible. This is further explained in the council's response above. I agree with the terms of the representation to the extent that residential development may be particularly appropriate on upper floors. However, it will depend on the circumstances of the case, and other uses may also be appropriate on upper floors. There is a specific reason given for the reference to offices, and I find in the circumstances that there is no requirement to specify where other uses may be appropriate.

21. Furthermore, I find that there is no reason to suggest from paragraph 133 that the requirement within criterion c) for office space (where practicable) would hinder other forms of development. In the context of the consideration of this matter in the main

issues report, I do not consider that either the resulting criterion c) or supporting paragraph 133 is too prescriptive with respect to the inclusion of offices. Other than clarification with respect to the text of the policy referred to under the previous heading, I conclude that no change to Policy Del 3 is required.

EDINBURGH WATERFRONT

Edinburgh Waterfront – General

22. Paragraph 82 of the local development plan explains that the policies in the local development plan support the council's local transport strategy by seeking to minimise travel demand and encourage a shift to more sustainable forms of travel. Where considered appropriate, transport interventions which have their origins in the local transport strategy are included within Table 9. There are also key transport elements within the development principles for the individual areas of the Edinburgh Waterfront in Table 11, and further details and programming (which would be regularly updated) in the related action programme.

23. The Edinburgh Waterfront proposals are generally rolled forward from the Edinburgh City Local Plan. Although there are some changes from the concept diagrams in the adopted plan to the development principles in the proposed plan (in particular the housing capacity of the area has been significantly reduced), the overall approach remains consistent with that set out in the adopted local plan. Development within this area is therefore not specifically assessed within the transport appraisal's examination of the effects of new development proposals on the transport network. I have noted the reasons put forward on behalf of Trinity Community Council as to why this is considered to be unacceptable, but a transport appraisal of the proposals in the adopted Edinburgh City Local Plan would have been carried out at the time the plan was prepared, and in any event the transport appraisal's approach takes into account baseline and committed development proposals before addressing the effects of new development proposals. The fact that the housing capacity of the area has been significantly reduced means that the pressure on the transport network is likely to also be reduced. In any event, the changes that have been made, and changes between the first and second proposed local development plans, are not in my view significant enough to warrant a further detailed transport appraisal.

24. Paragraph 68 of Circular 6/2013 considers it good practice, at the main issues report stage, to draw attention to the ways in which the preferred and alternative proposals differ from the spatial strategy of the existing adopted local plan. It is then necessary at the proposed plan stage to examine the issues raised in representations, and consider any potential modifications which may result from this examination. This process should consider whether or not there is a material change in circumstances, also taking into account that the local development plan must be consistent with SESplan, which identifies the Edinburgh Waterfront as a strategic development area.

25. Following on from the above, I find the council's approach to development within the Edinburgh Waterfront to be generally consistent with the provisions of Circular 6/2013. However, where specific representations have been made about particular elements of the transport network within the Edinburgh Waterfront, I consider these below. In any event, there is no requirement for a comprehensive transport strategy for North Edinburgh beyond that which is already incorporated in the council's local transport strategy.

26. Consistent with the approach to the other 3 strategic development areas, an overall strategic approach for the Edinburgh Waterfront is set out in a preamble, supported by Policy Del 4, and followed by major development proposals for specific areas identified within Table 11. A masterplan or site brief may be prepared, and the status of these development proposals would be updated within the action programme as appropriate. The action programme would be the primary means of identifying the timing of any related infrastructure improvements that are required. There is therefore no requirement for a revised Waterfront Development Area Framework in the local development plan.

27. Paragraph 109 states that there is no identified demand for large-scale industrial uses in Granton or Central and Western Leith. However, paragraph 111 refers to a new opportunity in the northern and eastern parts of Leith Waterfront (Leith Docks). Leith is identified in the National Renewables Infrastructure Plan as a suitable location for large-scale industrial development to construct and service wind turbines and other equipment.

28. There is no evidence to suggest that paragraph 109 is inappropriate. I recognise that there is benefit from the close proximity between houses and workplaces, but if the available information is that there is no demand for large scale industrial uses, then it is more appropriate to provide for uses for which there is a demand. In any event, the fact that a particular type of large scale industrial development has now been identified for the Leith Docks mitigates the lack of provision for large scale industry in the remainder of the Leith Waterfront and Granton Waterfront. I therefore conclude that no modification to the proposed plan is required following these general representations relating to the Edinburgh Waterfront.

Edinburgh Waterfront – Housing Capacity

29. Following a further information request and the subsequent hearing, the estimated capacity of sites for housing (all as part of mixed use development) in the Edinburgh Waterfront has been reduced from 17,100 houses in Table 3 to approximately 12,000 (with 520 completed) based on the 2015 housing land audit (not yet formally approved). This reduction follows masterplan and other changes. Since only a proportion of this is programmed during the plan period, the capacity figure has limited significance for this local development plan, but should nevertheless be updated within Table 3. I find that the revised figure stated above (updated to reflect the latest approved housing land audit and split into the component parts for each of the waterfront areas) should be included.

30. Although the capacity of sites for housing in the Edinburgh Waterfront has been reduced to 12,000, only 5,016 houses (less than half the overall capacity) are expected to be delivered in the plan period (now extended to 2026). Furthermore, of these 5,016 houses, only 646 houses are expected to be delivered in the first five years. As explained in Issues 2 and 5, the low anticipated uptake and contribution from this significant resource within the waterfront is largely responsible for the anticipated shortfall in the housing land supply and therefore in providing justification for release of effective green belt sites to make up the supply in the interim.

31. The representations on this matter generally maintain that the waterfront fails the tests set out in Planning Advice Note 2/2010 primarily because of its lack of marketability, with the location not being supported by the housing development industry. The contribution to the housing land supply is therefore overstated, and the mix of housing types is not appropriate. It is also suggested that there is no viable transport solution to enable the delivery of housing in the Edinburgh Waterfront now that the tram line will not

reach the waterfront area. The representations seek either the removal of the housing sites or a significant reduction in their contribution to the overall housing land supply.

32. In so far as the proposed tram extension to Leith is concerned, only part of the Leith Waterfront area is dependent upon this tram extension, and developer contributions have been identified in the action programme. Whilst there is no programme relating to the delivery of the tram extension, which is referred to as long term, the related housing development is not linked to the timing of the tram extension, and I therefore find that the latter is not a constraint to development.

33. At the hearing, there was discussion about the contribution of the Edinburgh Waterfront to the effective housing land supply. As described above, most of this contribution is expected (according to the 2015 audit) in the latter part of the plan period, with a very limited contribution to the effective 5 year housing land supply. However, the council explained that the sites identified as constrained were no longer in reality constrained, and are able to contribute in the same manner as the remaining sites. This is examined further below and also within Issue 5.

34. Significant concern has been expressed within representations in relation to the density of development within the waterfront sites. Development so far implemented has been in the form of large blocks of high density flats, and it is considered that maintaining this level of density would not be viable, and should be reduced in order to facilitate delivery. At the hearing, the council stated that future development would not necessarily follow the form of the development so far implemented, and that through the masterplan process a mix of housing types would be secured. The programmed housing in the 2015 audit for the various sites in the Edinburgh Waterfront takes this into account.

35. In addition to the above, there is an issue relating to the proposed housing led mixed use allocations on land at the Britannia Quay and south of the Edinburgh Dock. Forth Ports Ltd has indicated that this land will be retained in port use throughout the plan period, and that it cannot therefore be allocated for such development in the local development plan. This matter is further examined below under the overall land use strategy for the Leith Waterfront, but the council states that the programmed housing on the relevant sites in the Central Leith Waterfront can take place without use of the land being retained in port use.

36. The land being retained in port use within the Britannia Quay and south of Edinburgh Dock has a capacity for 1,830 houses, and the remainder of those areas has a capacity for 1,800, so the latter constitutes about half of the overall capacity. The total programmed housing within the plan period constitutes 1,150 (from the 2015 audit), so this is clearly within the capacity of the remainder. However, the rate of completions required, taken in the context of the expected completions for other sites in the area, may prove optimistic unless there is reason to expect a greater contribution from the remainder of the land than would occur elsewhere within the waterfront area.

37. On the other hand, evidence was provided by the council at the hearing that there is potential for increasing the contribution from housing on the sites in the Edinburgh Waterfront throughout the plan period. This may be difficult in the first 5 years, but over the plan period as a whole I find that this is a realistic prospect. Whilst some of the areas identified have existing uses (these being examined further below) still in operation, much of the land has been cleared and lies vacant. From my site inspection, I find that there is little obvious physical constraint to the development of cleared and vacant areas within

the Edinburgh Waterfront, which appear to be readily available for development, as long as the masterplan approach identifies a type of housing for which there is current marketability, and financial viability issues can be addressed. The council's approach to forward and gap funding of the required infrastructure may prove significant in this respect and is examined in Issue 21.

38. The council has provided evidence relating to the sites identified as constrained, which shows the extent to which they are expected to contribute to the housing land supply to 2026. Following a further information request (agreed at the hearing) the council considers that 1,987 houses on sites currently identified as constrained would contribute to the housing land supply between 2020 and 2026, thus maintaining the level of housing contribution referred to in the first 2 paragraphs of this section above. This is disputed on behalf of Homes for Scotland, and an analysis of the expected contribution from the sites identified as constrained is set out in Issue 5 under the heading "assumed completions from constrained sites", where the relevant sites within the Edinburgh Waterfront are specifically referred to. In any event, no significant contribution to the 5 year effective supply is assumed, with programming only commencing with 307 anticipated completions in year 2020/2021.

39. I note the views expressed in the responses to the council's information, questioning the certainty that can be given to the expected contribution. In this context, the entries in the action programme are referred to where there is no timescale, cost or funding information relating to the identified actions. On the other hand, there is a response from Waterfront Edinburgh Limited which reiterates its commitment to the development of sites in the Granton Waterfront. Whilst I recognise that more work is required in order to progress the action programme, I find that the council's assessment of the potential for development on constrained sites is credible, and that its approach is reasonable. This matter is also examined in Issue 5, where it is concluded that it is reasonable to rely on an assumed contribution from these sites.

40. On balance, therefore, I find that the programmed housing from the 2015 audit reflects a reasonable assessment of the prospects for development overall, and that the total contribution to the effective housing land supply from the Edinburgh Waterfront of 5,016 houses in the plan period is convincing. However, it should be emphasised that this is heavily weighted towards the latter part of the plan period, with only 646 houses programmed in the first 5 years of the plan period.

41. Although I consider that the main thrust of the representations on this matter relate to the need to sufficiently address the contribution of the Edinburgh Waterfront to the programmed housing land supply, they do also seek the deletion of sites owing to their lack of deliverability within the plan period. I acknowledge that deliverability is a key element in local development plans in the context of paragraphs 78 and 112 of Circular 6/2013, and that sites identified in the local development plan should be capable of being implemented within the plan period.

42. However, the strategy for the Edinburgh Waterfront is set out within the National Planning Framework and SESplan, and although the local development plan has reduced the expected housing contribution significantly, I find that the overall approach to housing led mixed use development remains consistent with national and regional policy, even though only part of the housing is expected to be delivered during the plan period. Some of the housing land is effective, and in the circumstances I find that it is reasonable to identify the overall capacity for housing in the plan as part of the longer term approach to

the regeneration of the area. I therefore find that there is no reason to remove sites from the plan, in whole or in part, despite their limited contribution in the plan period.

43. Notwithstanding the above, in recognising the current context, I conclude that some additional text is required in order to explain the extent of the effective housing land, and that this is part of the longer term regeneration of the area. In addition to the overall capacity for housing in Table 3 being reduced, further information should be added as appropriate in an additional paragraph following paragraph 113. This is set out in the recommendations below, and takes account of the detailed issues examined below relating to individual sites (and particularly Proposal EW 1b) which require further consideration with respect to deliverability and other matters. However, I conclude that other than this, and the change to the capacity for housing in the Edinburgh Waterfront referred to above, no changes to the plan are required with respect to this matter.

Edinburgh Waterfront – Flood Risk Assessments

44. The Scottish Environment Protection Agency (SEPA) has provided a matrix of development sites with respect to the need for flood risk assessments and mitigation of flood risk. No development sites have been recommended for exclusion. However, all of the development sites in the Edinburgh Waterfront have been identified as requiring a flood risk assessment. SEPA has indicated that strategic flood risk assessments should be carried out or (where they have already been carried out) reviewed for all of the proposals identified within Table 11, and school Proposals SCH 4 and SCH 5 in Table 5.

45. I acknowledge that Policy Env 21 states that planning permission will not be granted for any development that would increase flood risk or be at risk from flooding, adversely affect areas of importance for flood management, or prejudice existing or planned flood defence systems. In addition, paragraph 183 (revised through Issue 22) states that in such cases proposals will only be favourably considered if accompanied by a flood risk assessment indicating appropriate mitigation measures to offset any increased risk.

46. However, I also refer to the findings in Issue 19 that where a flood risk assessment is required, this should be incorporated into the development principles where they are provided for specific sites in the local development plan. The reasons for this are given in Issue 19. I therefore conclude that appropriate additions should be made to the development principles set out in Table 11 in the terms of the response from SEPA. I accept however that for the school proposals in Table 5 it is appropriate to rely on Policy Env 21 because there is no schedule of development principles provided for this.

Leith Waterfront – Overall land use strategy

47. Whilst there are additional matters relating to the special economic area designation for the Leith Docks, and the proposed east-west coastal cycle path, the representations referred to by the council under this heading primarily relate to Proposal EW 1b, the Central Leith Waterfront. This is the area in which there is the most significant dispute about the overall land use strategy within the representations. There are also additional matters relating to the development principles within this area, which also apply to some extent to other areas within the Leith Waterfront, and these are separately considered under the headings for each individual proposal (including Proposal EW 1b) below.

48. I note that Forth Ports Ltd has changed its intentions for the Britannia Quay (which is at the western end of Proposal EW 1b). It appears that at the time of preparation of the

main issues report, Forth Ports Ltd supported the identification of housing led mixed use development at the Britannia Quay, but that the port operator has reviewed its position, and now considers the Britannia Quay essential to the future of its cruise business and the servicing of the adjacent flour mill. I have noted the vision for the Port of Leith set out in the memorandum of understanding among Forth Ports Ltd, Scottish Enterprise, and the council, and I note that this supports the economic case set out in the representation on behalf of Fort Ports Ltd, which I find convincing. The port operator now has no intention of releasing the land at Britannia Quay. In addition, and for similar reasons, land to the south of Edinburgh Dock (which is at the eastern end of Proposal EW 1b) is also intended to be retained for port related uses.

49. There is also an intention to retain land at Seafield (within Proposal EW 1d) for port related uses. However, I find that this is only of significance in relation to the representation relating to the safeguarded coastal cycle route which is further considered below. Proposal EW 1d relates to land designated for business and industry, and although paragraph 111 refers specifically to the opportunity for large scale industrial development to service renewable energy projects, I find that the interests of the port operator would be maintained through the designation of the land for business and industry on the proposals map, and the description of the area set out in Table 11, which refers specifically to port related uses.

50. However, a conflict now arises between the intentions of the port operator and the development principles set out for proposal EW 1b in Table 11. My reading of the situation is that, to be consistent with the intentions of the port operator, the diagram in Table 11 would at least require to be amended by the removal of 5 blocks of housing led mixed use development from Britannia Quay, and 3 blocks from the land to the south of Edinburgh Dock. However, the representation goes beyond this and seeks designation of the relevant areas for business and industry. I have noted that the concept diagram within the existing adopted local plan shows the area as mainly business/retail/leisure use, although I recognise that matters have moved on since then.

51. I acknowledge in the context of Circular 6/2013 that the main issues report is the primary mechanism for developing the strategy from the options that are available, taking into account the views of stakeholders, but this does not mean that the proposed plan cannot be changed from the preferred options where circumstances may justify this.

52. The strategy within the National Planning Framework and SESplan would not in my view be significantly affected either way. The continued use (and development) of port related uses, other industrial and business development, and housing development would all accord with this. In the context of the whole of the Leith Waterfront regeneration, the affected areas are relatively small. It is a question of what would be more appropriate and effective in the overall delivery of the regeneration project. I also do not consider that the outcome of this issue has a significant bearing on the effective housing land supply, following my earlier findings in relation to the housing capacity of the waterfront.

53. I note the council's concern that the change to Proposal EW 1b would not be consistent with the land use strategy for Leith (as set out in the Leith Docks Development Framework), where both the Britannia Quay and the area to the south of Edinburgh Dock follow the principles set out in Figure 1.16 and sections 1.5 and 1.12 respectively. The envisaged phasing of development (2005 – 2010) is however an indication of the difficulty of implementation of projects in the Leith Waterfront.

54. There would also be implications for the planning of adjacent areas, including the implementation of the proposed new road under Proposal T15 and the proposed cycleway under Proposal T8 (considered further below). The safeguarded tram route also runs along the southern boundary of the Britannia Dock. However, within mixed uses areas residential amenity cannot be expected to be the same as within established residential areas, and this is offset by the provision of more affordable housing and access to sustainable transport and the variety of recreational and shopping facilities in the area, as well as ready access to potential employment opportunities.

55. From my site inspection, I find that the masterplan process should be able to ensure that sufficient residential amenity is retained by providing an appropriate buffer between proposed residential development and the areas retained in port use, including the safeguarded line for the proposed tram extension. The Chancelot Mill would be retained in any event. There would essentially be little difference between the residential amenity of this area and that of the existing blocks of flats to the east. The remaining blocks of housing led mixed use to the south of Edinburgh Dock would be able to integrate with existing port related uses in a similar way. Part of the western most of the 3 blocks (an area of existing vacant land which is outwith the ownership of Forth Ports Ltd) could be retained for housing led mixed use development.

56. In any event, the deliverability of proposals in the local development plan is an important consideration in the context of Circular 6/2013. I acknowledge that this has to be set against the need to implement the regeneration strategy in accordance with the extensive detailed studies that have been undertaken, including the Leith Docks Development Framework, and in the context of SESplan. However, I find that Proposal EW 1b requires to be capable of delivery in the plan period. I accept that the position of Forth Ports Ltd could change, but I find this to be unlikely from the evidence available.

57. I therefore find that it is inappropriate in the circumstances to identify the land owned by Forth Ports Ltd for housing led mixed use development in the development principles, and that it would be misleading to retain such a proposal in the local development plan. For the avoidance of doubt, this is significantly different from the limited deliverability prospects of the overall housing allocation within the Edinburgh Waterfront referred to above, because it relates to specific sites which are unlikely to be developed in accordance with the development principles and associated diagram, with a potential alternative development approach which would still accord with the SESplan strategy.

58. I note the concern expressed on behalf of Forth Ports Ltd about port related development being outwith permitted development as specified in the general permitted development order. I acknowledge that where a planning application is required, granting planning permission for a proposed port related development may not be consistent with Proposal EW 1b if this is shown as housing led mixed use development. However, whilst this is a material consideration, I find that it does not significantly add to the inappropriateness of identifying the land owned by Forth Ports Ltd for housing led mixed use development, because the resulting inconsistency would need to be weighed against the merits of continuing port related development on the site which already exists.

59. Notwithstanding the above, and whereas the council could have reviewed the land use allocations (even when preparing the second proposed plan), taking into account the appropriate masterplans which have been prepared, it is more difficult through this examination to recommend modifications to the proposed plan relating to the most appropriate land use designation on the proposals map. I consider that a more detailed

assessment would be necessary before designating the land for business and industry, which as a result I find would be inappropriate through this examination.

60. I therefore conclude that Proposal EW 1b should be modified by deleting all of the text after the first sentence of the description, and the first bullet point of the development principles. The block diagram should be amended by omitting all of the blocks of housing led mixed use development on land owned by Fort Ports Ltd both in the Britannia Quay and south of the Edinburgh Dock. This constitutes the 5 blocks in the Britannia Quay and 3 blocks south of Edinburgh Dock, except for the western part of the westernmost block which is outwith the ownership of Forth Ports Ltd.

61. The deleted text should be replaced by text requiring a review of the development framework for the areas concerned, in order to provide a revised approach to the development of the area, including a revised diagram representing this approach. Appropriate text is set out in the recommendations below for this. The intentions of Forth Ports Ltd should be taken into account, with consideration being given to the identification of port related uses where appropriate. Following on from this, the next review of the local development plan could consider the designation of these areas for business and industry on the proposals map, if this would then be appropriate.

62. With respect to the representation on behalf of the Edinburgh Chamber of Commerce, I find that the proposed modifications below and the review of the development framework for Proposal EW 1b would (together with Proposals EW 1d and EW 1e) provide sufficient opportunity for the use of land at the Leith Waterfront serving the city as industrial or commercial (or port related) land creating jobs and economic benefit. I do not consider that it would be appropriate to replace all of the land designated for housing use by commercial use. Housing use accords with the strategy identified for the waterfront within National Planning Framework 3 and SESplan. Some of this has already been built, although the majority has still to be implemented.

63. I note that the special economic area designation for the Leith Docks relates solely to Proposal EW 1e, that it originates from SESplan, and appears to be particularly related to the development of renewable energy. This is one of 7 special economic areas in the plan, but it is treated differently and is not designated on the proposals map. I find that other general business and industrial development in the Leith Waterfront does not require such a designation, and that there is therefore no requirement to extend the special economic area designation within the Leith Waterfront as identified within Table 2.

64. With respect to the proposed east-west coastal cycle path, I note that there may be constraints relating to operational port land, particularly since the route crosses the Britannia Quay and land south of Edinburgh Dock. However, the route shown on the proposals map should be regarded as indicative at this stage. I consider that the bullet point for this should be retained within the development principles, but that the review of the development framework for the Leith Waterfront should further consider the feasibility of providing the cycle path and its proposed route. This is incorporated into the modification recommended below. No further changes are therefore required with respect to these representations.

<u>Leith Waterfront – EW 1a Leith Western Harbour</u>

65. Representations seek an increase in the size of the park under Proposal GS 2, which is further considered under the heading of greenspace below, by removing the inner ring

of housing blocks to the south east of the park, and increasing the number of units elsewhere, for example at the east end of Proposal EW 1b. It is considered that this would allow a more attractive place for the number of people that would be accommodated in the area, and also provide a more attractive route for cyclists, pedestrians and tourists within the area. In addition, it is submitted that there should be provision for cruise liner and related leisure facilities within the Western Harbour area.

66. Following my site inspection, I have noted that several large blocks of flats have already been developed or are under construction. A feature of these is the seafront location, which has been used to advantage in the design of the flats. A supermarket, restaurant and cinema have also already been developed within the area. Otherwise the area has extensive vacant land, including the area proposed for the park under Proposal GS 2. The council's evidence following the hearing is that further housing development is likely to be more diverse in nature. I find that this would be beneficial and result in a more diverse urban character not dominated by the existing large blocks of flats, which would then be integrated into the development of the area as a whole.

67. The proposed park would be a key feature in the overall integration of development in the area, and assist with placemaking in the context of Scottish Planning Policy. However, I consider (particularly taking into account a more diverse form of housing development in the future) that there is no justification for increasing the size of the park and removing any of the blocks of housing led mixed use development shown on the diagram. Cycle provision is already accommodated. Since the Britannia Quay is being retained for port related use, and already provides a berth for the royal yacht and a terminal for cruise ships, there is no evidence to justify the provision for cruise liner and related facilities in the Western Harbour. I therefore find that no modification to the local development plan is required with respect to these representations.

Leith Waterfront – EW 1b Central Leith Waterfront

68. Similar issues to the above are raised with respect to the Central Leith Waterfront, but this time referring to the Britannia Quay, seeking more space along the quayside by the removal of the blocks of housing from here, and keeping part of the site (adjacent to Ocean Terminal) free from structures, all of this to make the area more attractive, and with open vistas of the harbour and beyond. Design guidance to secure tiered structures between the Western Harbour and Chancelot Mill is also suggested.

69. Following my site inspection, similar circumstances apply as they apply to the Western Harbour, and some of the matters raised are detailed matters which would be more relevant to the development framework. In any event, in this case, and in view of my findings with respect to the overall land use strategy for the Leith Waterfront above, the matters raised within these representations (relating to the form of housing led mixed use development within the Britannia Quay) would need to be considered within the recommended review of the development framework. I therefore also find that that no modification is required with respect to these representations.

Leith Waterfront – EW 1c Salamander Place

70. I note from my site inspection that new housing is already under construction in this area, and I find that the development principles are likely to result in housing being the principal use within the area, even though it is described as housing led mixed use development. However, the area already contains existing business and industrial uses,

which would only be likely to be phased out if and when they come to the end their productive lives. Alternatively, there is the opportunity to provide replacement business and industrial space if there is a demand for this.

71. There is also a large area of vacant land to the west of the open space designation (Proposal GS 3) south of Sailmaker Road, which appears to be readily available for development. I find that the development principles would create an appropriate balance of potential uses and secure an appropriate townscape solution, and that no modification to the local development plan is therefore required. However, the proposed open space (Proposal GS 3) is further considered below under the heading of greenspace.

Leith Waterfront – EW 1d Seafield and EW 1e Northern and Eastern Docks

72. Monitoring statutory limits on air pollution is not a matter for the planning system, and any air quality management scheme will not be derived from this process. In any event, proposals for energy generation under Policy RS 1 and for waste management facilities under Policy RS 3 (within which there is specific reference to safeguarding the site of Proposal EW 1d for such provision) require that there is no significant adverse impact on residential amenity or the environment. I therefore find in the circumstances that there is no justification for incorporating standards for air quality into the development principles for Proposals EW 1d and EW 1e.

73. The designation for particular uses within Proposals EW 1d and EW 1e has to be based upon the best evidence that is available at the time the local development plan is prepared. Part of this area is a special economic area, and there is no evidence to suggest that renewable energy projects relating to deep water berths outside the current port local gates would be inappropriate. I therefore consider that the specific reference to this is justified. However, the area is described as being for general industrial, storage and business development and port related uses. It is therefore not restricted to renewable energy projects. I find that the site is suitably located for sustainable economic development, and that there are other more appropriate brownfield housing development opportunities on the Leith Waterfront. The introduction of text into paragraph 113 to suggest that housing development would be kept under review for this site would be inappropriate and therefore misleading.

74. With respect to the second bullet point in the development principles for Proposals EW 1d and EW 1e, I recognise that Policies Des 1 to Des 13 provide a general structure for determining the design of individual development proposals. However, there is a specific relationship between the development of tourism at the Port of Leith and ensuring a sound approach to sustainable economic development of the business and industrial areas in Proposals EW 1d and EW 1e. I note that this was identified through the main issues report stage. I find that the bullet point is justified, and that there is no reason to believe that there would be any significant conflict between these interests. I conclude that no change to the plan is required in relation these representations.

Leith Waterfront – Greenspace

75. The representations referred to with respect to Proposal EW 1a above seek to increase the extent of the open space within Proposal GS 2. The council states that 5 hectares is a typical size for a community park, and is part of the masterplan exercise for the Western Harbour. Following my findings above relating to the Western Harbour, I also find under this heading that there is no requirement for an extension of the park area

shown on the diagram associated with the development principles.

76. However, as part of a general requirement to increase the amount of greenspace within the area of the Leith Waterfront, representations seek significant additional open space in Proposal EW 1b. From my site inspection, I find that there is no justification for specific open space provision (along the lines of Proposals GS 2 and GS 3) within this area. However, I would expect open space to be integrated within any housing development taking place in the area.

77. Representations also seek an enlargement of Proposal GS 3 to run northwards through Proposal EW 1d (essentially at its boundary with Proposal EW 1e) to the coast, and also westwards into Proposal EW 1c. I note that this proposal has been reduced in size by deleting an area of open space to the north within proposal EW1d. I find that there would now be no basis to extend this open space through Proposal EW 1d, given that this is designated as an area for business and industry. Extending the open space westwards would limit the available area for housing led mixed use development.
I recognise that the scope for open space within the Port of Leith is fairly limited, and that the only significant areas are Proposals GS 2 and GS 3. However, the mixed use nature of the area limits the opportunities available.

78. On the other hand, a representation seeks the deletion of Proposal GS 3 owing to the existing businesses that exist within this area on Salamander Place. The issue here is whether or not the open space has a reasonable prospect of delivery within the plan period, and whether or not the designation unreasonably adds uncertainty to the existing businesses. From my site inspection, I note that there is a cul de sac south of the main road leading to a number of business premises. In addition there are business premises along the south side of the main road, including the premises relating to the specific representation. These businesses appear generally to be viable, and do not appear to be of a temporary nature. Premises are sound and generally in good condition.

79. Whilst I acknowledge that housing led mixed use development is consistent with national and regional strategy, the current existence of the above business premises suggests that housing here is likely to be longer term, and probably part of housing that is not programmed up to 2026 in the 2015 audit. The open space designated on the proposals map extending over the existing business premises should therefore be removed, with the open space area only extending as far as the southern boundary of the business premises. There may be an opportunity to extend the open space westwards to some extent through the masterplan process for housing development on the existing vacant land. However, I consider that this matter should be addressed under the bullet point in the development principles relating to the Leith Links seaward extension, rather than designation on the proposals map, for which there is insufficient evidence to be precise about the western boundary of any such open space extension.

80. I therefore conclude on this matter that there is insufficient justification for extending the open space as shown either on the proposals map, or in the diagrams associated with the development principles for the proposals in the Leith Waterfront. Furthermore, I conclude that the open space area for Proposal GS 3 should be modified on the proposals map by deleting the area which extends into the business premises on the south side of Salamander Street.

Granton Waterfront – EW 2a Forth Quarter

81. With respect to the third bullet point of the development principles, I recognise that housing densities should be maximised commensurate with the redevelopment of a brownfield site as part of an urban regeneration project, but at the same time should reflect market demand at the time of development. It should be noted that the delivery of homes within the plan period (for the whole of the Edinburgh Waterfront) is now expected to be in the order of 5,000 rather than the 15,000 which was expected at the time the representation was submitted. I refer to my findings above on the expected nature of future housing development in the waterfront area, and I also note that the same issue applies to Proposals EW 2b and EW 2c considered below.

82. I find that both the current text of the bullet point and the requested change to the bullet point are both too prescriptive in the circumstances (on opposite sides of the scale) for this development principle set out in the local development plan. The detailed housing mix is a matter for a site development brief or masterplan. Furthermore, it is not the purpose of the local development plan to amend the content of the existing masterplan. I consider that the bullet point should simply set out the principle of the housing mix by relating it to the particular redevelopment location. In the circumstances, the same text should apply to all 3 areas (EW 2a to EW 2c) of the Granton Waterfront. I provide an appropriate text for this bullet point in my recommendations below.

Granton Waterfront – EW 2b Central Development Area and EW 2d North Shore

83. I have noted the support and intentions for development expressed within the representations. With respect to the concern expressed about residential development on individual plots within the Granton Waterfront, this appears to relate to the approved masterplans, and I note the council's response. I find that in general terms there is no requirement to amend the format of the diagram in Table 11, which is indicative of the urban form of development to be provided, and is not part of the proposals map. In addition, I find that the requested additional bullet points relating to the protection of the local environment would not be consistent with the purpose of the development principles, which is to set out an appropriate framework for specific proposals taking into account the environmental and infrastructure requirements for these proposals. They would however still be considered in the context of the policies of the local development plan including those for the protection of the local environment.

84. With respect to the specific request for the inclusion of housing led mixed use development to the north of the proposed school site, I note that the council accepts in its response above that the identification of these plots for housing led mixed use development would reflect the approved masterplan for the area. However, on this matter, representations relating to the diagram in Table 11 have been submitted on behalf of the Friends of Granton Castle Walled Garden, which in the circumstances I have decided it is necessary to take into account, and I have therefore sought further information from the council and prospective developer about the matters raised.

85. I note that although there was a representation to the council in May 2015 seeking the designation of the Granton Castle Walled Garden as a special landscape area, this does not constitute a formal representation to be considered as part of this examination because it was not lodged timeously with respect to the publication of the second proposed plan in 2014. The representation on behalf of the Friends of Granton Castle Walled Garden therefore essentially relates to the retention of the walled garden as open

space, rather than its designation for housing led mixed use development.

86. The issue here relates to whether or not land to the north of the proposed school should be included for housing led mixed use development in the diagram in Table 11. In the first instance, I would emphasise again that the diagram is indicative only; it is not part of the proposals map. Essentially the role of the diagram is to support the development principles, with a visual representation as to how development should progress in relation to those principles. It is therefore a fairly broad brush approach, and if development proceeds with minor adjustments to the land use framework as shown in the diagram, this would not necessarily render the development inconsistent with the local development plan. It would be a matter of degree to be determined according to the merits of the case.

87. Notwithstanding the above, I accept that the diagram should represent the most appropriate land use and boundaries for the particular blocks of land shown in the diagram, from the information that is currently available. In this context, however, the boundaries of the actual blocks of housing led mixed use cannot be too detailed. Essentially, the masterplan shows two areas of relevance, these being an area within the walled garden and an area to the west. Whilst development management decisions are relevant considerations, even where planning permission has not yet been formally granted, they are not binding as to what should be included within the development principles and the associated diagram in Table 11.

88. A further consideration is whether or not open space should be retained as currently shown on the proposals map, given that Waterfront Edinburgh Limited considers that the relevant area of open space within the walled garden should not be so retained, as there is no current access to it and the council has already considered housing to be appropriate through the development management process. The council however wishes to reserve its position on this matter. On balance, I find that the most appropriate course of action is to allow the council to reserve its position by retaining the open space as currently designated. This would not prevent the development of the site should this be considered appropriate through the masterplan and development management process.

89. With respect to the diagram in Table 11, I find that the most appropriate course of action is to show the area to the west of the open space as housing led mixed use development, as I consider that there is no reason to presume against such development being appropriate in this area. However, and following on from the above paragraph, I find that the area within the walled garden should not be so indicated. Whilst this would not rule out such development in the future, being an area of open space on the proposals map, and a (non-inventory) designated walled garden with listed buildings, I find that such development needs further consideration through the masterplan and the development management process. Showing this area for housing within the diagram would therefore not be appropriate at this stage.

90. The council has also suggested a number of boundary corrections on the proposals map which I agree ought to be made in order to provide more accuracy. However, I find that there is a difficulty with respect to the proposed inclusion of the area to the north of the school (including both of the sites referred to in the above paragraph) within Proposal EW 2d both in the diagram and on the proposals map. This matter is raised within the representation on behalf of Waterfront Edinburgh Ltd. In particular, showing potential housing led mixed use development north of the proposed school on the diagram would render this inconsistent with the concept of proposal EW 2d, which provides for longer term housing development, and which therefore does not indicate blocks of development.

91. However, I agree with the council that the notation "Business and Industry area" on the diagram for proposal EW 2d should be amended to: "Temporary Light Industrial Uses and Housing", which would better reflect the description of the proposal and clarify the eventual outcome of providing for housing led mixed use development in the area. Any proposed changes to the housing land audit are outwith the remit of this examination, although making this change provides for a more logical consideration of the two areas in terms of their contribution to the programmed housing land supply.

92. In overall terms on this matter, I conclude that no changes are required to the open space designation on the proposals map. The area of the walled garden should not be shown for housing led mixed use development on the diagram, but the area to the west of the walled garden should be shown for such on the diagram. Both areas should however be included within Proposal EW 2b rather than EW 2d, both in the diagram and on the proposals map, to enable housing to be considered as appropriate in the short term (or retention of open space in the walled garden if this is more appropriate), which would not be consistent with the long term housing concept which applies to Proposal EW 2d. My recommendations below set out the changes required.

93. With respect to the proposed expansion of the local shopping centre (which is shown on the proposals map within proposal EW 2c for Granton Harbour), I find that the terms of Proposal S2 are sufficient, particularly since Policies Ret 4 and Ret 6 define the parameters for the consideration of retail development in or on the edge of a local centre, and leisure/entertainment facilities and visitor attractions within the Granton Waterfront. No change to the local development plan is therefore required on this matter.

94. I note the concerns expressed in relation to the third bullet point of the development principles, and whilst the concerns expressed are somewhat different to those expressed with respect to Proposal EW 2a above, I find that they would nevertheless be satisfied by my recommendation below that this bullet point should be reworded.

95. Proposal EW 2b incorporates land which is an intended location for the development of a national collections facility for the National Galleries of Scotland, Royal Commission on the Ancient and Historical Monuments of Scotland and Historic Environment Scotland. It is my understanding that this is proposed within 5 blocks of housing led mixed use development to the south of the new street (east to west) shown on the diagram. I also note the council's response which suggests that a new designation for these blocks as "cultural use or housing led regeneration" would be appropriate.

96. I find that this would indeed be more appropriate than either of the existing designations generally used for the diagrams in the Granton Waterfront, as it would directly relate to the terms of the representation, but still allow flexibility for new housing development where appropriate. In addition, I find that it would as a result be appropriate to add the word "cultural" to the final bullet point within the development principles for Proposal EW 2b, also taking the opportunity to correct a grammatical error within this bullet point as identified in the representations. These changes are set out in my recommendations below.

<u>Granton Waterfront – EW 2c Granton Harbour</u>

97. I note the concern expressed in the representations that the approved masterplan (2009) no longer accords with the housing market, or expectations for tourist facilities and berthing facilities for ships within the harbour. I also note however that the council

considers the development principles to be consistent with the outline planning permission for development within Granton Harbour, and a more recent masterplan approved in 2014. I recognise that masterplans may be revised as development progresses, particularly where the timescale for implementation is a lengthy one.

98. In this context, I find that a balance has to be drawn between providing appropriate development plan status for key elements of the Granton Harbour regeneration project, and allowing flexibility within the details of the proposed development in order to meet changing circumstances. It would be counterproductive to promote a situation where development consistently requires to be approved contrary to elements contained within the development principles set out in the local development plan.

99. With respect to the design considerations, I find that the first bullet point is relatively non-specific, and essentially refers to the implementation of development in accordance with the diagram, which in turn illustrates the key principles relating to the development proposed within the project. There is nothing that would constrain tourism and berthing facilities. There is considerable scope for variation in terms of the design of the actual development. The details of the development would be expected to follow the up to date masterplan, which I accept may change over time. This first bullet point also relates to Proposals EW 2a and EW 2b, and needs to be consistent across all 3 proposals within the Granton Waterfront.

100. With respect to the second bullet point, the representation essentially raises similar issues to those raised in relation to Proposal EW 2a, and I find that my recommendation below is an appropriate response in the context of Proposal EW 2c as well. In overall terms I find that the first 2 bullet points (as amended) set appropriate placemaking principles in the context of Scottish Planning Policy, and do not unnecessarily constrain innovation and the up to date design solutions which may be proposed, to an extent which might be seen to be inconsistent with the development principles set out.

101. The local development plan cannot elevate masterplans to a status of being part of the development plan, which the requested change to the third bullet point would do. However, I note the concern expressed in the representation to the effect that this bullet point may unduly constrain the form of the shopping facilities provided. Policy Ret 4 sets out the criteria for the development of local shopping centres, and this applies to the existing and proposed new centres listed in Table 6. Granton Waterfront is listed as a new local centre, which is also identified in Proposal S2. However, there is nothing within Appendix B which defines the extent of this proposed local centre. It is not shown in the diagram for Proposal EW 1c (although it may be represented by the single block of commercial led mixed use development) and is denoted by a symbol on the proposals map. Whilst this gives an approximation of its location, it is not site specific.

102. I therefore find that the eventual form of the shopping facilities provided is not unduly constrained by the third bullet point in the development principles referring to the implementation of Proposal S2 as shown on the proposals map. However, I find that it is unnecessary in the circumstances to refer to retail units under flatted development, because this is a particularly detailed specification, and a change would not necessarily undermine the development principles for Proposal EW 2c. I am not convinced that a supermarket of 1,500 square metres is a limit; this could simply be an indicative figure. In any event, the figure of 1,500 square metres does not appear to be sufficiently justified within the plan and reference to this should therefore in the circumstances be omitted. I find that the third bullet point should be reduced to a statement about implementing

Proposal S2, and an appropriate modification is set out in my recommendations below.

103. With respect to the proposed cycle route, this is a safeguarding proposal which would allow for a coastal cycle route to be provided adjacent to the seafront. From my site inspection, I find that this appears to be the most appropriate route. However, it is a safeguarding proposal which does not necessarily constrain any of the other development proposals on the site, but which should nevertheless take this into account. I find that a symbol would not be sufficient in the circumstances, and would not be consistent with the general approach being taken to identify the most appropriate indicative routes for new footpaths and cycleways in the local development plan, in order to promote active travel. No change to the local development plan is therefore required.

104. I note the requested change to the fifth bullet point with respect to the inclusion of boat storage. The council has indicated that the existing reference to improved mooring facilities should be taken to include this. However, there appears to be a specific need for boat storage in addition to improved mooring facilities, and I therefore find that this should be included within the bullet point, although it is not necessary to include all of the detail suggested within the representation. I include an appropriate modification for this below.

Policy Del 4 – Edinburgh Waterfront

105. Associated with the changes sought to the fifth bullet point of Proposal EW 2c, it is suggested that facilities for existing water based recreation should be safeguarded by a criterion within Policy Del 4. However, I find that this does not fit well with the primary purpose of Policy Del 4, which is to set out the standards which development proposals will be expected to meet. This does not necessarily extend to the safeguarding of existing facilities. I find that there is no requirement to repeat the development principles set out within the specific proposals on this matter.

106. I however take a slightly different approach to the issue of open space provision, because this is crucial to the principles of placemaking for new development, and particularly in the Edinburgh Waterfront, where open space is not necessarily as plentiful as elsewhere in the city. This has already been examined with respect to Proposals EW 1a to 1e in the Leith Waterfront above. I therefore find that it would be appropriate to add a criterion (probably after criterion c) requiring appropriate provision of open space within development proposals. I do not consider that it is necessary to refer specifically to green or civic space, as the more general term of open space would suffice.

107. With respect to the footpath and/or cycleway shown on the proposals map for the Edinburgh Waterfront, this has already been examined above for both the Leith and Granton Waterfronts. It is shown generally on the proposals map under Proposal T8, and also on the diagrams for development proposals within the Edinburgh Waterfront, where it constitutes an east-west route generally along the seafront. I acknowledge that cycleways in particular should connect to the remaining cycle network in order to maximise their contribution to active travel. However, I find that for the purpose of Policy Del 4, it is sufficient to state that the east-west path will form part of the city-wide coastal promenade (as safeguarded) on the proposals map. Other than the additional criterion relating to open space provision, I conclude that no changes are required with respect to these representations.

WEST EDINBURGH

General

108. The West Edinburgh Planning Framework has now been superseded by the relevant provisions of the National Planning Framework, and therefore the references in the local development plan to the West Edinburgh Planning Framework should be replaced with references to National Planning Framework 3. Appropriate references may also be made to the West Edinburgh Strategic Design Framework and the Edinburgh Airport Masterplan. However, I note that paragraph 148 of Circular 6/2013 refers to non-statutory guidance and states that (although it may be a material consideration in decision making) this will not form part of the development plan. The text should therefore avoid any inference that might be taken to elevate the status of such non-statutory guidance to the status of the development plan. I refer to other instances below where existing references in the plan also elevate the status of non-statutory supplementary guidance.

109. In addition to Paragraphs 196, 197 and 198, there is also a reference to the West Edinburgh Planning Framework in relation to the International Business Gateway as a special economic area in Table 2. This is included in the representation on behalf of the Scottish Government, and this reference should also be updated to refer to National Planning Framework 3 with appropriate text. I provide appropriate text for all of the required revisions in respect of this matter in my recommendations below.

Edinburgh Airport and Royal Highland Centre

110. Hotels may be permitted within the boundaries of Edinburgh Airport, the Royal Highland Centre and the International Business Gateway in accordance with Policy Emp 10. Other ancillary uses may be permitted in accordance with Policy Emp 4. This gives a significant element of flexibility to the policy. However, I consider that the (current) second sentence of the first paragraph is appropriate to the extent that this still requires such development to have strong and relevant functional links with the airport and be compatible with its operational requirements. I therefore find that to add to the latter “or complement the development of the wider area” would undermine an integral requirement of the policy, and that the requested addition would be inappropriate.

111. However, I have noted that Policy Emp 4 also requires development to accord with the approved masterplan, and this is inappropriate because it elevates the status of the masterplan to being part of the development plan. I provide an alternative appropriate form of wording in my recommendations below.

112. The representation from the Scottish Government on this matter is essentially concerned that the local development plan provides for the long term development of the land, currently in use for the Royal Highland Centre, for airport uses by safeguarding the land for such uses except where development complies with Policy Emp 5. So this is really a matter for Policy Emp 5 (rather than Policy Emp 4) and I find that the council is therefore correct to the extent that Policy Emp 4 and its supporting paragraph is not the most appropriate mechanism for this. No change to the policy is required in this context.

113. Nevertheless, I agree with the representation from the Scottish Government to the extent that this particular safeguarding is not sufficiently provided for in the local development plan. This should be rectified by putting text in similar terms to that suggested on behalf of the Scottish Government in Policy Emp 5, as indicated in my

recommendations below. In addition, Policy Emp 5 requires development to accord with the West Edinburgh Strategic Design Framework, and this is also inappropriate because it elevates the status of this guidance to being part of the development plan. I provide an alternative appropriate form of wording in my recommendations below, together with a commensurate clarification within paragraph 197.

114. With respect to the omission of land to the east of Ratho Station from the safeguarding of land for the relocation of the Royal Highland Centre, I note that this constitutes only 5 hectares out of the total of 120 hectares within the safeguarded area. However, the safeguarding is supported by National Planning Framework 3, and I find that there would need to be a compelling reason to delete this part of the site from the safeguarding shown on the proposals map. In this context, I refer to the conclusions in Issue 14 on the representation seeking an additional housing site on this land. Following on from these conclusions, I conclude that no change should be made to the safeguarding of land for the relocation of the Royal Highland Centre.

115. Whilst British Airways PLC supports the provisions in Policies Emp 4 and Emp 5 (as well as Policy Emp 10), it is also stated within the representation that consideration should be given to removing the green belt status of land safeguarded for the expansion of the airport, in order to facilitate proposals coming forward in the future. However, I find that whilst it is important that such land should be safeguarded from development which may prejudice such future expansion, the green belt status of the land remains important in order to ensure that future development is appropriate to the location. I conclude that land safeguarded for the expansion of the airport should be retained within the green belt, and that therefore no change to the local development plan is required in this respect.

International Business Gateway

Context

116. There is a representation seeking the omission of Policy Emp 6 from Table 4, which identifies some 300 to 400 houses as part of a business led mixed use development, essentially because of uncertainty relating to the number of houses and the area of the site upon which housing would be located, and residential amenity concerns relating to the proximity of the airport. On the other hand there is a representation from the prospective developer seeking an increase in the number of residential units that could be accommodated on the site to some 2,350 residential units. The potential contribution to the housing land supply suggested within the representations is therefore very wide-ranging, which is not surprising given the overall size of the development site, and the variety of land uses that could be provided.

117. National Planning Framework 3 (NPF3) refers to West Edinburgh as a significant location for investment, including the International Business Gateway. This is related to the enhancement of Edinburgh Airport as a national development. The definition of national airport development extends to include construction of buildings for business, general industrial or storage and distribution use requiring a near airport location where the gross floor space is or exceeds 10,000 square metres or the development is or exceeds 2 hectares in the area identified for associated business development at Edinburgh, Glasgow and Prestwick Airports. Areas adjacent to Glasgow and Edinburgh Airports have been identified for commercial and mixed uses supporting the economic development opportunities which are particularly suited to these locations. Reference is made to the International Business Gateway but only in the context of its potential for

international investment, new jobs and a high quality of place. The International Business Gateway is also referred to in SESplan as part of the regional core. The area is identified as a special economic area in Table 2 of the local development plan.

The capacity of the site for housing

118. The main issue is whether the site should also accommodate housing and if so at what scale. The capacity of the site for housing is reviewed below, taking into account the provisions of NPF3 and SESplan, the core planning case and masterplan provided on behalf of the prospective developer of the site, and other submissions made following further information requests. I also examine the infrastructure implications arising (particularly transport), the effect of any substantial housing development on the future operation of Edinburgh Airport, and the effectiveness of housing development on the site and its programming. Following on from this, I identify any necessary changes to Tables 2 and 4, the development principles for the site and the associated diagram; and I also examine the content of Policy Emp 6.

119. I note that the council in its response above accepts that the capacity for housing may be greater than that shown in Table 4. The council also acknowledges that the diagram on page 55 of the local development plan is inconsistent with others, and could be amended to show which blocks are considered suitable for housing led mixed use development. Following discussion at the hearing on infrastructure and housing land delivery, it was agreed that a further information request would be issued, seeking the comments of the council, New Ingliston Ltd and other parties on the overall capacity of the site for housing, and the number of houses which could be delivered as part of the first 5 years effective housing land supply, and in the remainder of the plan period.

Further information request and responses received

120. Following the further information request, the council has indicated in its response that programming provided on behalf of New Ingliston Ltd for some 2,365 houses as part of the overall development of the International Business Gateway is realistic, and has suggested that the capacity of the site for housing could therefore be identified as 2,000 to 2,400 within Table 4, with various other alterations to Tables 2 and 4, a new school entry for the International Business Gateway in Table 5, and revisions to the development principles and Policy Emp 6, as well as some other consequential changes. A new diagram is provided for inclusion to support the development principles, should the reporters so recommend. A separate response has been received on behalf of West Craigs Ltd, which (in addition to questioning the deliverability of housing on the site in similar terms to the responses received from other parties below) provides a revised diagram for land in its ownership at the eastern end of the site. This is considered separately in my findings below.

121. Responses have been received from other parties, indicating that the level of housing provision would now be six times greater than that identified for the site in the proposed plan, and would no longer be consistent with NPF3 or SESplan. A greater proportion of the site would be used for a strategic housing allocation with a corresponding change in the emphasis of the site from business use to housing. Although now withdrawn, the West Edinburgh Planning Framework is considered to have provided the essential basis for recognising the site as a strategic business site in both NPF3 and SESplan, and that this is confirmed in the letter from the Scottish Government dated 26 September 2014 withdrawing the guidance.

122. Furthermore, it is suggested that it would be inappropriate to make such a significant change in the land use allocation for the International Business Gateway through the local development plan examination. It is submitted that the plans for the International Business Gateway should remain as they are, with additional housing provided elsewhere in the plan area. Various concerns are raised with respect to the development principles now considered appropriate on behalf of the council.

123. On the basis of the current evidence, it is also suggested within representations from Homes for Scotland and others that the deliverability of the housing within the plan period is speculative and over-optimistic. It is submitted that a start date of 2018/19 is unrealistic given the required processes of environmental assessment and consultation that would have to be carried out. There remains significant uncertainty with respect to the required transport infrastructure particularly in relation to cumulative and cross boundary impact. Completion of the housing within the plan period is also unrealistic, requiring a significant number of separate house builders (in respect of which no evidence has been so far provided, and is considered unlikely) and a high annual completion rate which is not considered to be achievable. The site should therefore not be relied upon to make a substantial contribution to meeting the shortfall of effective housing land.

The principle of significantly increasing the housing capacity

124. I recognise that it would have been preferable to address a higher capacity of the site for housing through the main issues report, and subsequently in the preparation of the proposed plan, in the context of Circular 6/2013. The current proposal through this examination constitutes a significant increase in the previously identified capacity of the site for housing, and would involve a significant change to the proposed plan. It is not possible through this examination process to undertake the more extensive consultation (including neighbour notification) which would have taken place when the proposed plan was prepared and published. Furthermore, I recognise that the environmental effects from increased housing development (including cumulative effects) may require a further strategic environmental assessment. However, this would be a matter for the council to address before adopting the local development plan.

125. The council now supports an increase in the capacity of the site for housing, as contained in representations on behalf of New Ingliston Ltd. It has submitted a new diagram which it considers would be appropriate for inclusion in the plan. However the council cannot propose a modification to the plan at this stage. Rather, it is for the reporter to recommend appropriate modifications to the council, taking into account the views of all the relevant parties.

126. In this context, increasing the capacity for housing (even to the maximum level sought within the representations) is not significantly different from the allocation of new strategic housing sites sought within representations, and examined through Issue 14. Indeed, in this case the increase relates to an established development site, which would assist the focus on sustainable development which would not compromise green belt objectives, as referred to in Issue 5. However, a key issue in this case is the role of the International Business Gateway in the context of NPF3 and SESplan.

127. I sought the further views of the Planning and Architecture Division of the Scottish Government (and others) on the appropriateness or otherwise of introducing substantial additional housing to support the primary function of the International Business Gateway

as a business development site through this examination. The Planning and Architecture Division responded to the effect that such a significant increase in the amount of housing would markedly change the uses within the International Business Gateway from business led as identified by the national development. This would significantly diminish the business opportunities for this prime location, which could then be lost to Scotland as a whole. The loss of that opportunity would fail to fulfil the long term spatial strategy set out in NPF3.

128. In response, New Ingliston Ltd refers to the detailed masterplan and placemaking work that has already been done in the context of NPF3, Scottish Planning Policy and SESplan. The masterplan that now exists, and which has been used to inform the preparation of a new diagram for the local development plan, gives rise to employment space capable of accommodating 16,000 workers and residential space housing some 5,750 people. It is submitted that this clearly maintains a business led focus to the masterplan and reinforces business as the dominant use.

129. The council essentially supports the position of New Ingliston Ltd, identifying a figure of 238,000 sq metres business floor space from the masterplan, which represents the full business potential of the International Business Gateway, also stating that this relies upon realising a critical mass of housing to achieve a good diverse place and the compact, mid-density urban form envisaged in the masterplan. It is suggested that the figure of 238,000 sq metres business floor space could be included within Table 2. There would be no net loss to the overall strategic employment land supply.

130. The council has also submitted a letter from Scottish Enterprise which fully supports identifying a capacity for 2,000 to 2,400 houses at the International Business Gateway, provided that the impacts on infrastructure (including the road network, public transport, footpaths and cycleways, education and school provision, landscape and open space) can be fully satisfied. The masterplan should seek to fully integrate housing development into the business led orientation of the International Business Gateway. The new diagram submitted on behalf of the council is considered to be a helpful addition.

131. Policy Emp 6 is clear in stating the main purpose of the site to attract investment and create new jobs and to support this nationally important economic development opportunity. I consider the core planning case and masterplan information submitted on behalf of New Ingliston Ltd demonstrates the substantial capacity of the site to accommodate a strategic scale of employment space (238,000 square metres of business floor space is shown on the masterplan) along with over 2000 houses. In addition, the response of Scottish Enterprise indicates that an integrated housing development could enhance rather than detract from the role of the site as a centre for international business development through the creation of an environment consistent with the placemaking principles set out in Scottish Planning Policy.

132. However, inclusion of housing on a strategic scale alongside employment use changes the intended composition of the site. This moves away from a direct reflection of the description as contained in the National Planning Framework. The annexe maps show the entire area under the heading “Strategic Airport Enhancement”. Given the response from Edinburgh Airport, the rationale for including significant housing as part of this national development becomes less clear. I am concerned that what is proposed on behalf of New Ingliston Ltd (now supported by the council) represents a significant change in the proposals for the International Business Gateway from what is currently included in the proposed local development plan, as well as departing from the

description in the National Planning Framework.

133. This change would comprise a substantial increase in the capacity of the site for housing in Policy Emp 6 as shown on the new diagram submitted on behalf of the council. It would effectively become one of the largest housing allocations in the plan. This would bypass the normal consultation procedures required in the preparation of the proposed plan. It would also presume towards an optimum mix of uses which may not be borne out by further collaborative working through the master planning process. Whilst I recognise that there is a shortfall in the programmed housing land supply, this site is allocated primarily for international business development in the context of NPF3 and SESplan. I do not find its current inclusion in the proposed plan to be deficient in meeting these national and strategic requirements. In the context of Circular 6/2013, this examination is primarily about examining the appropriateness and sufficiency of the content of the proposed plan. Only if the proposed plan is insufficient or inappropriate should other sites or approaches be considered. So whilst it may be that some further recognition of the developing situation is required within the local development plan, there are in my view significant difficulties with a formal strategic housing allocation in the plan at this stage.

Transport infrastructure

134. I consider the International Business Gateway to be in a sustainable location in transport terms, being close to the tram network and the transport interchange at Edinburgh Park. However, I also refer to the representations expressing concern about the effect of new housing development on the trunk and local road network which are examined within Issue 19. In this context, a new policy is recommended to ensure that development proposals fully address transport impact (including cumulative impact) where appropriate. Furthermore, through Issue 21, general development principles for infrastructure delivery in the main development areas (including West Edinburgh) are recommended in order to mitigate the cumulative impact arising from the scale of housing development proposed. In addition, Supplementary Guidance is recommended through Policy Del 1 to facilitate the delivery of appropriate infrastructure, including transport and education infrastructure. The action programme (which would be annually updated) would then set out the detail and timing of the proposed infrastructure.

135. This approach is intended to meet the primary concerns expressed on behalf of Transport Scotland. However, whilst this would also apply to any significant increase in housing capacity within the International Business Gateway, such housing development would be additional to that already provided for within the proposed plan. Further concern has been expressed about this in the response from the Planning and Architecture Division of the Scottish Government on behalf of Transport Scotland. It is submitted that introducing significant changes to land use at this location, and at this stage in the process, without any transport appraisal, presents a significant risk to the potential success of the development and the performance of the strategic transport network. This is a further component of the difficulties of recommending a significant change in the proposals for the International Business Gateway through this examination.

136. There is also a substantial submission made by Mr A J C Clark which goes substantially beyond the remit of this examination, but nevertheless highlights the pressures on the existing transport network within West Edinburgh, and the limitations of the network in being able to handle the significant increase in traffic which may be generated by further development within the International Business Gateway. The impact on other infrastructure provision also referred to in his submission.

137. It is also submitted on behalf of Transport Scotland, that whilst the cross boundary study is ongoing, this will not address the issues raised by increasing the housing capacity of the International Business Gateway. The cross boundary modelling is undertaken with assumptions based upon what is included in the proposed plan. The response from the Planning and Architecture Division also refers to the studies (and work so far undertaken) with respect to the required improvements to transport infrastructure within West Edinburgh, based upon known proposals for development in the area, and indicates that providing for additional housing in the area could increase the likely requirement for further infrastructure.

138. In this context, previous studies highlighted the need for a holistic approach to assessing the availability of non-car based services and infrastructure against demand where destination parking is strictly limited by agreement and design principle. This approach would need to be expanded to residential use in terms of the principles of both parking control and service or infrastructure provision. Furthermore, changing sections of this site to housing may present challenges in identifying appropriate trip generation assumptions for the modelling which is necessary to determine how impacts on the network resulting from these proposals differ from those resulting from previous allocations within the site. A further transport assessment is considered to be necessary.

139. However, the council maintains that the examination report is able to introduce significant changes to land use, and that the risk identified by Transport Scotland is to an extent a normal potential outcome of the statutory development plan process. In any event, the evidence and suggestions submitted by the council to the examination seek to minimise that risk through an appropriate spatial strategy and through the factors and reasoning presented in the council's schedules and further information request responses. The council has suggested the inclusion of development principles relating to all of the strategic and other transport measures which are required to mitigate the impact of development within the International Business Gateway, even in the event that there is a significant increase in the level of housing provision.

140. The council also refers to a separate cross boundary transport appraisal being carried out by SESplan (for SESplan 2), which is using a housing figure of 2,400 together with a gross business floor space figure of 136,000 sq metres. Whilst the council has also supplied the figure of 238,000 sq metres as the full potential business capacity for the International Business Gateway, it is understood that SESplan chose to retain the original figure as a realistic rate of business development in the foreseeable future, taking into account other business development potential in the wider area.

141. The council further maintains that the local development plan makes provision for a holistic approach to car parking through Policy Tra 2, which sets out key criteria, many of which are specifically intended to relate to residential use. The council also suggests that if the reporters are so minded, a further bullet point could be added to the development principles to the effect that car parking provision will be set at levels which help achieve sustainable transport objectives, referring to Policy Tra 2.

142. The effect of development on the trunk and local road network is fully examined in Issue 19, where it is concluded that the local development plan as it stands is not consistent with Policies 8 and 9 of SESplan with respect to the provision of appropriate transport infrastructure to mitigate the impact of new housing development. It is recommended that additional text should be incorporated into the proposals in Table 9, and development principles and site briefs where individual, cumulative or cross

boundary effects suggest that the stated transport interventions may be insufficient. It is also recommended that a new policy should require development proposals to fully address transport impact (including the cumulative and cross boundary impact) and then address the required infrastructure in Table 9 and in the development principles.

143. Whilst not ideal, this is considered to be sufficient for the development proposals already included in the proposed plan. However, whilst further strategic housing provision (either within the International Business Gateway or on new sites within the strategic development areas or elsewhere) would be subject to the provisions of the new policy (and the subject of appropriate development principles), it would nevertheless represent an additional potential burden on the need for additional transport infrastructure, which has not been assessed at all within the transport appraisal for the local development plan, and which has not been the subject of the same level of consultation with the local community and service providers as the sites already included in the plan.

144. This adds to the difficulty of introducing a significant land use change for the International Business Gateway through the examination process, pointing to a need to limit the nature and status of any additional housing provision, emphasising the further transport assessment process that would be required in order to confirm the extent of the change.

Education infrastructure

145. The council has suggested that appropriate provision should be made for new primary and secondary education facilities, and for any significant increase in the capacity of the site for housing, I find that this would be necessary. I note that the site is located within the West Edinburgh Cumulative Assessment Area where education actions have been identified to mitigate the impact of the planned housing sites, and that the cumulative assessment would need to be re-run to include this site, assessing its impact against both existing school capacity and those actions already identified. The manner in which the education requirements within the site should be recognised within the development principles would clearly depend on the extent and status given to housing provision within the International Business Gateway through the local development plan.

Open space provision

146. In commenting on the potential significant increase in housing as sought within the representations on behalf of New Ingliston Ltd, and the new diagram for the International Business Gateway submitted on behalf of the council, Scottish Natural Heritage (SNH) considers that the increase in housing raises questions about the provision of open space and the placemaking principles in the context of the City of Edinburgh Council's Design Guidance Principles. In particular, attention is drawn to noise issues associated with the open spaces proposed along the A8 corridor and the likely future requirements for sustainable urban drainage. Both may restrict the quality, safety and usability of the open space as set out in the revised development principles diagram.

147. It is suggested that further consideration should be given to the quantity, functionality and location of open space within the development area. Also, the revised development principles could provide greater clarity and further guidance on the location and scale of the built form, and particularly the location of landmark buildings. In a subsequent response, SNH however acknowledges that these concerns are to some

extent recognised within the masterplan, and has essentially accepted that these matters are for further consideration through the development management process.

148. However, having drawn the attention of SNH to the masterplan on which the submitted new diagram is based, and following further comments on behalf of SNH, the council has suggested that a bullet point could be added to the development principles stating that the central parkland element will be of particular importance in meeting the council's large greenspace standard and should be designed and maintained accordingly.

149. I find that there is nothing to suggest that the open space indicated on the suggested new diagram would be inappropriate or insufficient for an increased provision of housing within the site. However, it is likely to be the case that the provision open space and landscape setting are both matters which require further consideration at the development management stage. Nevertheless, this open space equates to the green space designated on the proposals map through Proposal GS 6. This is essentially a further matter to consider in examining the appropriateness or otherwise of the suggested new diagram, and is drawn to a conclusion with other matters below.

Residential amenity and aircraft safety

150. A further key issue to be assessed is that of residential amenity. The site is close to Edinburgh Airport, which has expressed concern (following a further information request) about increasing the amount of housing potentially to 2,400 houses so close to the airport. There is also a representation from the airport relating to the extent of housing undermining the role of the special economic area. This is further examined within Issue 4, and I have already examined the proposed increase in housing in the context of NPF3, Scottish Planning Policy and SESplan above.

151. I understand the concern that significant housing development in close proximity to the airport could have an adverse effect on the operation of the airport. Additional housing in the area could result in more complaints relating to noise if this has an adverse effect on residential amenity. However, I refer to the noise contours submitted by the council which show that the International Business Gateway is well outside the noise contours which may be of concern to the Civil Aviation Authority.

152. Aircraft safety is also an important issue, but the site does not lie within the airport safeguarding area. Landscaping and the potential for bird strikes (and other related matters) could be addressed through the development management process, ensuring that such matters are properly taken into account before any planning permission is granted. Appropriate conditions would be imposed on any grant of planning permission.

153. Residential amenity and aircraft safety are clearly matters which require further consideration in light of any future airport expansion plans. However, I find nothing conclusive at this time, particularly given the equally close proximity of the proposed development at Maybury, to suggest that impact on the future operation of the airport or the amenity of residents would rule out further consideration of an increased amount of housing on this site.

Effectiveness of the site for housing

154. I recognise the concerns expressed in the responses to the further information requests relating to the delivery of housing within the plan period. On the basis of these

concerns, particularly as expressed on behalf of Homes for Scotland, I find that there is considerable uncertainty that the now suggested capacity of 2,000 to 2,400 houses for this site could be delivered within the plan period. This matter is further examined within Issue 5. However, this is not necessarily significant in determining the overall capacity of the site for housing which should be included in the plan, together with appropriate development principles and/or a diagram setting out the approach to development, which would form the basis for the continuing master planning process.

155. The programming of the housing would be a matter for the housing land audit. However, through this examination it is clear that the contribution to the housing land supply from this site, whilst minimising the release of further green belt land, would not significantly alter the need or otherwise for new housing sites to be identified where the environmental and infrastructure consequences are deemed to be acceptable. However, my findings relating to the Edinburgh Waterfront examined above also apply here. The fact that only part of the housing on the site is likely to be delivered within the plan period would not rule out inclusion.

Overall conclusions on housing capacity

156. I conclude that the local development plan should provide a framework which reflects the masterplan and placemaking work so far undertaken, and encourages the further development of the masterplan, but without prescribing the relevant balance of uses or overstating its potential future role as a strategic housing allocation. Detailed master planning and further assessment including market testing should provide a firm basis for future development based on the principles set out in the plan. In this respect, I consider that inclusion of housing should be seen as an opportunity rather than a formal allocation at this stage.

157. Furthermore, I conclude that the infrastructure implications from increasing the capacity of the site for residential development are potentially significant. This is particularly the case with respect to transport infrastructure. Whilst the site has good access to sustainable forms of transport (particularly the eastern part of the site where most of the residential development is proposed within the masterplan), the impact on the trunk and local road network remains uncertain without a further transport assessment.

158. I recognise that the development principles for the site can include specific transport improvements as highlighted in the response from the Planning and Architecture Division of Scottish Government on behalf of Transport Scotland, and where appropriate make reference to the transport proposals in Table 9. In addition, the proposed new policy recommended through Issue 19 (and other recommended changes) provides a framework for further assessment of the cumulative impact of new housing development (including cross boundary impact) on the transport network in the context of Policies 8 and 9 of SESplan. Nevertheless, given the site's national development status significant additional housing would represent a major land use change. The identified transport infrastructure constraints add to my concerns about the International Business Gateway being interpreted at this stage as a further strategic housing allocation in the plan.

159. The education infrastructure constraints could probably be sufficiently covered by additional development principles as suggested on behalf of the council. However, the council accepts that there are issues with funding the requirements already identified in its action programme to accommodate the extent of development currently included in the proposed plan. Further requirements could accentuate uncertainty in this respect. The

areas of open space are already designated as such on the proposals map, and so it would be more a question of the quality and function of the open space which would need to be addressed. Whilst there is nothing conclusive to suggest that residential amenity and air traffic safety would present a significant constraint, this would have to be considered in the context of any future airport expansion proposals.

160. As far as the effectiveness of the site for housing is concerned, the inclusion of housing development as an opportunity rather than a formal allocation in the local development plan would be appropriate. It would not at this stage be appropriate to rely on housing within the International Business Gateway counting significantly towards the shortfall in the programmed housing land supply. Whilst similar considerations apply as they apply to the Edinburgh Waterfront, the main difference is that housing within the Edinburgh Waterfront has been established through SESplan, the existing adopted local plan and was reinforced through the main issues report for the local development plan.

161. Drawing all of the above together, I conclude that an opportunity for housing development should be recognised. However, the scale of this (for example whether or not it constitutes a level of housing that could be considered to be strategic in nature) should not be predetermined (even through an indicative range) within this local development plan. This matter should be left to further consideration through the masterplan and subsequent development management process, in the context of delivering the required national development with its emphasis on strategic airport enhancement and related economic development. Development principles should set out the parameters for the consideration of proposals through the development management process. The opportunity for housing development should not be interpreted as a formal housing allocation in the local development plan at this stage.

162. Table 2 of the local development plan should be modified as proposed by the council, but with a further modification to reflect the fact that housing development constitutes an opportunity (rather than an allocation) which remains subordinate to the business development. Furthermore, an additional sentence should be added after the first sentence following the recommendations in Issue 4. Table 4 should be modified to explain the nature of the potential for housing development in terms of the above, whilst not providing any predetermined indicative range, which should be left to the continuing masterplan and subsequent development management process. Reference should be made to the development principles set out for the International Business Gateway.

163. The development principles on page 54 of the local development plan should be extended to reference the need for a transport assessment and identify specific road transport infrastructure improvements (in which the council's suggested addition relating to parking standards should be incorporated) and the importance of open space standards being met in the central parkland area. Rather than include any specific principles relating to housing development at this stage, I instead recommend a change to the wording of Policy Emp 6. This would recognise the potential for housing as a component of a business led mixed use proposal subject to further consideration through the master planning process, appropriate infrastructure provision and where consistent with the objectives of the National Planning Framework. General development principles relating to cumulative transport and education infrastructure for West Edinburgh (including the need for a transport assessment) are recommended through Issue 21.

164. I conclude that the suggested new diagram should not be included in the local development plan. This would give a status to the masterplan (which is an ongoing

process) beyond that which I consider to be appropriate in the circumstances, even though it would only be indicative. It would also be inconsistent with my conclusion above that the scale of the housing opportunity should not be defined in this local development plan. Furthermore, the central area of housing development, being described as housing led development, also appears to undermine the focus on business led development. Even though it may not be the case, including areas of housing led development tends to suggest that the emphasis on housing development is greater than it actually is.

165. However, I also conclude that the existing diagram should be deleted from the development principles for the International Business Gateway. It does not reflect the developing situation in the masterplan and may be considered out of date. In any event, it is not described as a site brief, and is in a different form to the diagrams relating to other strategic development sites. It does not in my view provide any significant additional information to further explain the stated development principles. The open space is already shown on the proposals map under Proposal GS 6.

Eastern area of the International Business Gateway

166. With respect to the specific request to identify land within the eastern part of the International Business Gateway (east of the Gogar Burn) being actively encouraged for residential development, I find that this is a matter for the master planning process in due course. I find that there is insufficient evidence to justify this land being separately set out in Tables 2 and 4, the development principles or Policy Emp 6. I also find that the same applies to identifying a small area for industrial purposes (less than 1 hectare) adjacent to the site proposed for residential development. I regard this part of the site as an integral part of the International Business Gateway, and there is nothing within the proposed plan which restricts the use of any part of the site to particular classes of business or industrial development, or supporting development including housing.

167. Although this eastern part of the site is an integral part of the International Business Gateway, I note that the submitted masterplan does not include the development of the area to the east of the Gogar Burn. I understand that this is a reflection of the site being within a different ownership, and I find that it is necessary for all interested parties, including the ownership and development interests of New Ingliston Ltd and West Craigs Ltd, to agree an approach to the development of this part of the site through the masterplan process. West Craigs Ltd has suggested an alternative notation for the area to the east of the Gogar Burn within the suggested new diagram, and I consider that this is a further indication that it would not be appropriate to include the new diagram within the local development plan. There is no agreement yet among the parties, including the council, with respect to the development of the whole site of the International Business Gateway.

168. I consider that it is important to recognise that the housing opportunity (referred to above) applies to the whole of the site as identified on the proposals map. Any housing development on the eastern part of the site in which West Craigs Ltd has an interest should be considered through the masterplan process relating to the development of the whole site. I conclude that the proposals for the International Business Gateway through Table 2, Table 4, Table 5, Policy Emp 6 and the development principles should apply to the whole site as shown on the proposals map, and this is reflected in my recommendations below.

Other matters raised in the representations

169. With respect to the clarity, scale and content of the diagram, I find that this has now been addressed within my conclusions above.

170. Page 54 of the local development plan sets out the development principles for the International Business Gateway. These development principles (as amended) have to be read in the context of Policy Emp 6. Whether the development principles on page 54 are specifically described as a proposal is in my view of no great significance, as I consider that the development principles already essentially constitute a proposal in the plan. In any event, I find that there is no requirement to insert a specific new proposal as described in the representation, which would not necessarily be consistent with the approach taken elsewhere within West Edinburgh or within the Edinburgh Waterfront.

171. With respect to the content of the proposed changes set out in the representation, there is firstly no requirement to repeat the provisions set out in NPF3. The local development plan is required to have regard to this, and I have already examined the proposals for the International Business Gateway taking the provisions of NPF3 into account. It would be inappropriate to require development to accord with the implementation plans of the Edinburgh International Development Partnership, as such cannot be elevated to the status of the local development plan. Indeed, the correct approach is that any masterplan for the area, taking into account the interests of all relevant parties, should accord with the provisions of the local development plan including the development principles set out therein.

172. I have taken into account the content of the core planning case submitted on behalf of New Ingliston Ltd. This constitutes an overall approach to the development of the site including integrated transport connectivity, economic and employment benefits and an increase in the capacity of the site for housing already examined above. This has now been developed into a masterplan for the majority of the site, but which I consider to be an ongoing process.

173. I consider that the placemaking and transport principles are sufficiently covered by the development principles (as amended) and the relevant policies within the proposed plan. In particular, key transport proposals are already set out in the proposed plan. There is no requirement to quantify the extent of business and office space, hotel bedroom space, education, leisure and retail space or the potential number of houses. Indeed, following on from my conclusions above, I find that it may be prejudicial to do so, given the ongoing nature of the masterplan process. Whilst I note that the council has suggested that the figure of 238,000 sq metres of business floor space could be added to Table 2, I do not consider that this would be appropriate in the circumstances.

174. I do not necessarily take issue with the suggested changes to the text of the development principles. However, I find in the context of Circular 6/2013 that their inclusion is not necessary. I find that the proposed plan is sufficient and appropriate with the general and site specific development principles on infrastructure delivery and other matters recommended through this examination. The general development principles also clarify matters relating to the delivery and timing of the necessary infrastructure. There is in addition a request for a new delivery policy in the local development plan, which is further examined under the heading of infrastructure below.

175. With respect to the proposed changes to Policy Emp 6 set out in the representation,

my findings reflect those in the above paragraph. However, not only are the changes unnecessary, but I find that the policy (as amended following my conclusions above) provides for an appropriate balance of uses, and actually better reflects the provisions of NPF3 and SESplan by describing housing as a component of business led mixed use development. I note the council's suggested change to the policy with respect to education but find this is unnecessary at this stage given uncertainty about the scale of proposed housing. The council's suggested addition to require consistency with approved masterplans would not be appropriate, because this would elevate the status of such masterplans to that of the local development plan. It is incumbent upon the council to ensure that masterplans reflect the provisions of the local development plan, including the development principles set out therein.

176. Paragraph 198 does not require any alteration apart from clarifying the status of the West Edinburgh Strategic Design Framework as non-statutory planning guidance, and the change suggested by the council stating that housing (without the level of such being identified) will support placemaking and sustainability objectives, with which I agree.

177. I also agree with the council's position that there are separate policies for the protection of the architectural and archaeological heritage of the area, which are sufficient. In the context of the nature of the development principles set out, I find that the suggested addition in this respect would be too detailed. Masterplans will in due course be able to take architectural and archaeological heritage into account, and also provide more details on the exact location of new housing development. I therefore find that no addition to the development principles is required in this respect.

178. I recognise that masterplans will require adapting to changing economic and other circumstances, but I find that the mix of uses identified under Policy Emp 6 is appropriate. Options for different land take for different uses are a matter for the masterplans in due course. The design concept is set out in the West Edinburgh Strategic Design Framework. This will inform the development management process, but it constitutes non-statutory guidance, which the local development plan cannot determine or require compliance with.

179. Notwithstanding all of the above, I find that a change to the text of the final paragraph of Policy Emp 6 is required to avoid elevating the West Edinburgh Strategic Design Framework and related masterplans to the status of the development plan. There is however no requirement for any change to the title of the West Edinburgh Strategic Design Framework, as it is clear that this is not statutory Supplementary Guidance.

180. The Scottish Environment Protection Agency has identified the site as being at risk from flooding, and the possible risk of flooding is also referred to in Appendix 3 of Volume 1 of the environmental report. The site is in the same category as those within the Edinburgh Waterfront (requiring a flood risk assessment), and the principles referred to also apply here. I therefore find that an appropriate addition should be made to the development principles set out on page 54.

181. Subject to the changes recommended below, including to Policy Emp 6 and paragraph 198, I conclude that these other matters are sufficiently addressed.

<u>Edinburgh Park/South Gyle</u>

182. Although the development principles set out on page 56 of the local development

plan are not specifically described as a proposal, the housing element in Table 4 is so described, under the heading of Policy Del 5. In similar terms to my findings above relating to the International Business Gateway, I find that whether the development principles on page 56 are specifically described as a proposal is of no great significance, as I consider that they essentially constitute such in the proposed plan, as part of the narrative for the strategic development area of West Edinburgh. Paragraph 12 states that the local development plan includes significant proposals in the strategic development areas, and I find that the Edinburgh Park/South Gyle development principles are no exception to that process.

183. In any event, in addition to the council's stated intentions through the development principles, I agree with the council's position to the extent that Policy Del 5 should set out a framework for the consideration of individual development proposals through the development management process. It would therefore not be appropriate to remove Policy Del 5 from the local development plan.

184. The contribution of Edinburgh Park to the effective housing land supply is not in dispute in the context of the housing land audit, and there is therefore no evidence to question the inclusion of the housing within the diagram or within Policy Del 5 in this context. I note that there is a representation expressing concern about the definition of West Edinburgh in the local development plan, indicating that too much reliance s placed on land to the north of the A8. However, although the West Edinburgh overview map in Figure 13 is based upon the area to the north of the A8, there are also provisions relating to Gogarburn and the potential relocation of the Royal Highland Centre to the south of the A8, and this examination also examines potential housing to the south of the A8. There is no evidence to suggest an over-reliance on land to the north of the A8.

185. The primary pedestrian/cycle route shown on the diagram on page 58 relates to the key principles of development on the site, including appropriate active travel links, rather than to show how such active travel links connect to the wider network. I note that this route is not shown on the proposals map under Proposal T8, which would suggest it is a locally important route rather than a significant contribution to the wider pedestrian/cycle route network. However, I acknowledge that the route as shown on the diagram includes an arrow pointing to the north across the A8 at the Gogar junction, which would not be logical if there were no provision for a pedestrian/cycle crossing at this point. Such is not referred to in the description of Proposal T13, but the council refers in its response above to a pedestrian underpass proposed as part of the Edinburgh Gateway railway station project under construction, and on balance, whilst it may have been helpful for clarification, I find that a reference to this is not required within the development principles diagram for this site.

186. The representation on behalf of Scottish Natural Heritage (SNH) is linked to the above, in that it seeks an amendment to the final bullet point in Policy Del 5 to refer to connections with nearby transport hubs and routes to other parts of the city. Whilst this is an entirely valid proposition for active travel, I find that it goes beyond the purpose of the provisions of Policy Del 5. Active travel throughout the city is already the subject of criterion f) of Policy Des 7 and Proposal T8, which I consider meets the concerns expressed on behalf of SNH. Whist I agree that "direct" would probably be a better choice of term than "strong", I find that this is not of sufficient importance to justify a modification in the context of Circular 6/2013.

187. Retail is not specifically referred to in the development principles on page 56 or on

the diagram on page 57. The car parking for the Gyle Centre is denoted as mixed use redevelopment. Clearly, this could include retail, but this is not necessarily the only use that would be appropriate. I note the council's stated intention that any development should be more compact than the low intensity car park dominated layout that currently exists. I find that there is potential for an overall improvement in the townscape of the Gyle Centre. Whilst this could possibly be better reflected in the development principles for the Gyle Centre, I do not consider that it would be appropriate in the circumstances to recommend any change in this respect.

188. In any event, Policy Del 5 refers to comprehensively designed proposals which maximise the development potential of the area, and a new commercial hub adjacent to Edinburgh Park Station. So the council's intention is nevertheless something that fits in well with the overall approach to development in this part of West Edinburgh, by making more efficient use of land in providing appropriate development. Car parking would have to be maintained through Policy Des 7 (although not necessarily all surface level car parking), but the content of this policy also indicates that the need for this may to some extent be offset by the provision for more sustainable forms of transport. No change to the local development plan is required in this respect.

189. I note that there are representations supporting the proposals in the local development plan for Edinburgh Park/South Gyle, including the introduction of housing and other appropriate mixed uses. The housing is considered to be well placed in relation to sustainable transport, and I do not take issue with that view. One representation has a development interest in the site, and seeks as much flexibility as possible in terms of the permitted uses on the site, allowing the masterplan to develop in accordance with the plan's strategic outcomes. I find that the current development principles and the indicative layout in the diagram, together with Policy Del 5, allow a wide range of uses and significant flexibility in the way that these are designed, whilst setting out the key principles of the overall development of the site, in the context of NPF3 and SESplan. I find that the balance in this context is appropriate.

190. The Scottish Environment Protection Agency (SEPA) has identified the site as being at risk from flooding, and the possible risk of flooding is also referred to in Appendix 3 of Volume 1 of the environmental report. The site is in the same category as those within the Edinburgh Waterfront (requiring a flood risk assessment), and the same principles referred to above apply. I therefore find that an appropriate addition should be made to the development principles set out on page 56. Since SEPA has specifically referred to culverted watercourses and pluvial flooding, I find that this should also be included. However, in overall terms, with the exception of the change requested on behalf of SEPA, I conclude that no modification is required to the local development plan on this matter.

<u>Royal Bank of Scotland (RBS) Gogarburn and related matters</u>

Inclusion of the site in the strategic development area

191. To set the context for my examination of this matter, the main issues report for the local development plan translated the strategic development area established through SESplan into a diagrammatic map. This resulted in the assessment of options considered to be within the strategic development area. The spatial strategy in Figure 1 of the proposed plan shows the major development areas included in the plan, and also the areas of green belt to be retained. It does not seek to define the strategic development area, but merely the major development sites which are identified within this

area along with the areas of green belt. The West Edinburgh overview map in Figure 13 only differs from the spatial strategy in Figure 1 to the extent that the airport, which is shown as an employment centre on Figure 1, is shown within the red boundary on Figure 13. This is of no significant consequence to the matters raised within the representations.

192. The RBS Headquarters is designated on the proposals map under Policy Emp 7, and this policy area is outwith the areas designated for major new development within the strategic development area in both Figure 1 and Figure 13. It is also outwith the development principles set out following Figure 13. There are a number of elements within the representations on behalf of RBS, but I find that the key thread is essentially that the site should be included as a major development site within the strategic development area, and that development principles in the same format as for the other sites should be included for "Gogar Park", which would recognise the potential for further office and ancillary development at RBS Gogarburn, and possible mixed use development at Gogar Mount. A map showing the potential uses and how these could be referred to in a diagram representing the development principles has been submitted. The extension of the site to include Gogar Mount is separately examined below.

193. This matter is not informed by either National Planning Framework 3 or SESplan, and the identification of major development sites within the West Edinburgh strategic development area is for the local development plan to determine. When looking at a potential addition to the sites already identified, it is essentially a matter of considering the characteristics of the site concerned and its relationship to the other sites, and the surrounding green belt. The potential for further development that exists on the site is a significant consideration in this context. At the present time, this particular site is occupied by the RBS headquarters, which constitutes a major single user office development. Whilst there is potential for further development, the submitted layout plan shows that the area for further development is fairly limited in size, and clearly subordinate to the existing development.

194. There is an obvious physical relationship to the development sites to the north of the A8, namely the Airport, the Royal Highland Centre and the International Business Gateway, and the transport proposals in West Edinburgh that are set out in Table 9 will have to take into account the existing and potential office development on the site. There are also some similarities with the safeguarding of land for the possible long term relocation of the Royal Highland Centre, and the safeguarding of land for a potential additional runway for the airport. However, these are safeguarding proposals on generally undeveloped land, which differentiates them to some extent from the site of the RBS headquarters, which already contains major development, with the potential for further expansion.

195. The matters referred to in the above paragraph are particularly relevant to the representations seeking the exclusion of the site from the green belt, and in this context I refer to the conclusions in Issue 2 that the site should be retained within the green belt. This is a particular factor that distinguishes land to the south of the A8 from that within the strategic development area to the north. However, I acknowledge that this does not directly determine whether or not the RBS Headquarters should be identified as a major development site in the strategic development area. It would be possible for the site to be included as a major development site within both the green belt and the red boundary. In the context of paragraph 51 of Scottish Planning Policy, the site is being retained in the green belt even though it constitutes an existing major business development.

196. However, I find that the provisions for further development at RBS Gogarburn (subject to my further findings on the actual text below) are sufficiently well set out in Policy Emp 7. The situation is not as complex as for the development sites north of the A8, and I find that there is no requirement for development principles to be set out. Whilst there would in my view be no significant adverse consequences resulting from the inclusion of the site within the red boundary on Figure 13 (which would essentially also mean that it would constitute a major development site), I find that the plan is sufficient and appropriate without doing so. However, in the event of an extension to include Gogar Mount for mixed use development (examined below), this situation would require review.

Inclusion of Gogar Mount for mixed use development

197. With respect to the proposed extension of the site to include a site for mixed use development at Gogar Mount, I note from the original representations that this would comprise potential housing, leisure and further employment development. In addition, the response following a further information request in April 2016 concentrates on the potential use of the site for housing development. Appendix A provides a more detailed plan showing 3 potential housing areas, separated by landscaped open space and existing mature woodland, with mature woodland also enclosing the site along its boundaries. It is considered that the site has a capacity for around 30 houses, but in the event that there is a wider review of the green belt boundaries, the capacity of the site could increase given its location and potential. The site is indeed considered to be a suitable candidate for green belt release, and is not subject to the same constraints as larger development opportunities owing to its significantly smaller scale and limited impact on infrastructure provision. The development of the site would be able to use existing facilities.

198. The site would be separated by an area of open space (understood to be in use as a golf course) from the existing RBS Headquarters, and would otherwise extend to the area safeguarded for the possible long term relocation of the Royal Highland Centre. In the event that this extension was included in the local development plan for either mixed uses, or housing use alone, I find that it would also be necessary to include the golf course as well, in order to avoid what would otherwise be seen as an isolated pocket of development in the countryside to the west of the golf course.

199. In any event, I refer to the conclusions in Issue 2 that the RBS headquarters site should be retained in the green belt, together with my finding above that this would require review in the event that Gogar Mount was included in the plan for development. Following on from this, I find that the determination of this part of the representation is significantly dependent upon an examination of the effect of the proposed extension on the objectives of the green belt, including landscape impact and taking into account built heritage matters.

200. The site at Gogar Mount is enclosed behind stone walls and by its mature landscaped grounds. It therefore has a good existing landscape framework for development. However, I also consider that the site contributes significantly to the rural character of this part of the green belt, and therefore also to the landscape setting of the urban area of West Edinburgh, including the major development sites. Furthermore, the land associated with the RBS headquarters at Gogarburn is being recommended for retention in the green belt because the exclusion of this area would significantly erode the established green belt boundary along the A8, and the continuity of the green belt on this approach to the city. The wooded policies of Gogarmount to the west of Millburn Tower

serve to mark a clear distinction between the urban and rural area and maintain the quality of the landscape setting on the western edge of Edinburgh.

201. I note that Gogar Mount is a category B listed building, other estate buildings are also listed, and that the buildings are in a mixed state of refurbishment. It is stated that these buildings are now surplus to the requirements of RBS. I also note that the gardens and designed landscapes are in good condition, although in need of regular and active use. I therefore recognise that there is potential for further restoration of the buildings and the associated grounds, and that some enabling development may be appropriate in order to facilitate this.

202. However, I find that development on the scale proposed would be likely to have a significant adverse effect on the landscape setting of the western edge of Edinburgh, including the major development sites within the strategic development area. Although this would be mitigated to some extent by the existing landscaping and the potential for further landscaping of new development, I find that such development would be likely to undermine green belt objectives in the context of Policy 12 of SESplan.

203. In overall terms, I conclude that the allocation of the site for mixed use development (or for housing development on its own) in the local development plan would not be appropriate at this time, and is not justified by the submitted evidence. The potential for restoration of the buildings and grounds is outweighed by the likely significant adverse impact on the landscape, and therefore on green belt objectives. Whilst I accept that the development of the site would be relatively small compared to other proposed development in West Edinburgh, there would also still be some additional cumulative impact on infrastructure, and particularly on the transport network within West Edinburgh. I conclude that that any proposals for conversion of buildings and other enabling uses would be more appropriately considered through the development management process in the context of the policies in the plan including Policy Env 10. I therefore conclude that the site should not be allocated in the local development plan for mixed use or housing development.

Other matters raised in the representation

204. In addition to the above, a change to the text of Policy Emp 7 is sought, to omit the requirement relating to green belt objectives. In view of my findings above, this would not be appropriate. A change is also sought within Table 2, to revise the stated main purpose of the special economic area by removing the term “single user”. Whilst the initial purpose of the site was clearly for single user office development, I find that the position has changed somewhat, firstly because a requirement for such under the terms of a section 75 planning obligation ends in 2015, and secondly because planning permission has already been granted for further office development in the area to the south of the existing headquarters building. I also find that the restriction of the site to a single user is unnecessary in the context of the adjacent mixed use development proposed within the West Edinburgh strategic development area to the north of the A8. In my view, the removal of any requirement for single user use of the site would make no difference to maintaining the objectives of the green belt. I therefore conclude that Table 2 should be modified accordingly, and that there should be an associated change in Policy Emp 7 by removing the word “headquarters”. These changes are set out in the recommendations below.

205. Finally, designation of the area as an employment centre is sought on Figure 1.

I note that this is a relatively large site accommodating an office development with some 3,600 employees. It is a matter of degree as to whether or not it needs to be identified as an employment centre. I do not consider that there would be any adverse consequences from such a designation. However, I have no comparable evidence relating to the scale of the other employment centres already identified on Figure 1, and this is another instance where I find that the plan is sufficient and appropriate without such a designation. The key issue is that Policy Emp 7 provides the necessary framework to encourage appropriate development on the site.

206. In overall terms, I conclude that changes are required to the text of Table 2 and Policy Emp 7, but that otherwise no changes to the proposed plan are required with respect to this representation.

Infrastructure matters

207. The representation on behalf of New Ingliston Ltd also includes a request for a new policy focusing on a delivery mechanism for infrastructure. This matter is separately examined within Issue 21, and I refer to the findings in that issue. I consider that Policy Del 1 (with recommended revisions and with reference to Supplementary Guidance) is sufficient to reflect infrastructure delivery matters on all sites. I do not consider that the circumstances relating to West Edinburgh are unique or require a different approach.

208. The delivery policies for the city centre, Edinburgh Waterfront and Edinburgh Park/South Gyle also set out the criteria that individual proposals require to meet in order for planning permission to be granted. They are not just about infrastructure delivery. In any event, I find that the local development plan only requires a framework for infrastructure provision in relation to development proposals, and it generally provides that through the existing policies and proposals, including Policy Del 1, and the recommended general development principles for cumulative impact and the development principles for individual sites. The action programme also provides details and timing of infrastructure provision and this is regularly updated.

209. The remaining infrastructure matters relate to the representations on behalf of West Craigs Ltd. Paragraph 71 of the proposed plan relates to Table 5 and the identified proposal for new schools. I note that these are included following an education appraisal which was undertaken as part of the preparation of the local development plan, and there is no evidence before me disputing the context of this appraisal. Proposal SCH 6 at Maybury is to provide educational facilities relating to housing growth in West Edinburgh, and this matter is further examined in Issue 7. Financial contributions to this provision are examined within Issue 21, and I refer to the findings in that issue.

210. With respect to the proposed additions to the proposals in Table 9, these proposals are separately examined within Issue 19, and I refer to the findings set out in that issue. However, again I would also refer to the action programme which provides details and timing of infrastructure provision and this is regularly updated. Matters relating to developer contributions are examined within Issue 21. There is no requirement to omit the last sentence of proposal T10, because this is an option for further consideration.

211. With respect to the proposed change to paragraph 50 of the local development plan, I find that this would be out of context. Paragraph 50 sets out examples of the provision to be made within developments in order to contribute to the green network.

This is not about the means of delivery of the green network and who will make contributions. This matter is separately examined within Issue 21, and I refer to the findings set out in that issue. In overall terms, I find that no changes are required to the proposed plan with respect to these representations in the context of Issue 20.

Other Matters

212. Paragraph 88 relates to the requirements for new developments to include carbon reduction measures. I recognise that the proximity of development in West Edinburgh to the airport may reduce the scope for wind turbine development owing to the need to take into account air traffic safety. However, paragraph 88 is a general statement of intent, and I find that there is no requirement to refer to the limitations that may apply to one particular area. Furthermore, paragraph 89 already refers to the limitations on wind turbine development in the City of Edinburgh. In any event, paragraph 88 does not just relate to renewable energy from wind turbine development. No change to paragraph 88 is therefore required.

Reporter's recommendations:

Modify the proposed plan as follows:

City Centre

1. Table 10 – Development Principles – under Proposal CC 1 change the location from "St James Quarter" to "Edinburgh St James". A similar change is required to the aerial photograph on page 41, and in paragraphs 76, 133 and 190.

2. Table 10 – Development Principles – under Proposal CC 3 amend the diagram provided for Fountainbridge in accordance with Appendix A of the council's response to further information request 16.

3. Table 10 – Development Principles – under Proposal CC 3, add the following sentence to the fifth bullet point:

Proposals should also take the opportunity, where appropriate, to enhance the use, physical appearance and condition of the canal, where this would be of benefit to development implemented through Proposal CC 3.

4. Policy Del 3 – amend line 1 to state:

Development which lies within the area of the city centre as shown on the proposals map will be permitted which retains ...

Edinburgh Waterfront

5. Table 3 – amend capacity of Edinburgh Waterfront, inserting the final figures for the capacity of each component part from the latest approved housing land audit.

6. New paragraph after paragraph 113:

The council recognises that only part of the housing capacity within the Edinburgh Waterfront will be delivered within the plan period, but considers that the local

development plan should retain the proposals in full, because the longer term strategic importance of the waterfront outweighs the limited deliverability of the housing within the plan period.

7. Proposals EW 1a to EW 1e – insert an additional bullet point as follows:

review the flood risk assessment that has already been provided for this site

8. Proposals EW 2a to EW 2d – insert an additional bullet point as follows:

provide a strategic flood risk assessment

9. Proposal EW 1b – delete the text after the first sentence of the description and insert new text as follows:

Forth Ports Ltd has decided to retain land at the Britannia Quay and south of Edinburgh Dock in port related use, and therefore a modified approach to the development of this area from what is included in the Leith Docks Development Framework (2005) is required. The bullet points below within the development principles remain applicable, but the development framework will be reviewed in order to provide a revised approach to the development of the area, including a revised diagram representing this approach. The feasibility and route of the east-west cycle path shown on the proposals map will be further considered within the review of the development framework.

10. Proposal EW 1b – delete the first bullet point of the development principles.

11. Proposal EW 1b – diagram – delete the notation of housing led mixed use development from the land within the ownership of Forth Ports Ltd, constituting 5 blocks in the Britannia Quay and 3 blocks south of Edinburgh Dock, except for the western part of the westernmost block which is outwith the ownership of Forth Ports Ltd.

12. Proposals map – delete the area of Proposal GS 3 extending into the business premises on the south side of Salamander Street. The southern boundary of these properties should be the northern boundary of Proposal GS 3.

13. Proposals EW 2a, EW 2b and EW 2c – amend the third bullet point of the first two proposals and the second bullet point of the third proposal within the development principles as follows:

provide a housing mix that is appropriate to the site in terms of placemaking and would maximise completions within this urban regeneration proposal within the plan period

14. Proposal EW 2b – identify housing led mixed use development on the diagram, to the north of the proposed school site, as shown within Appendix A of the council's response to further information request 20.

15. Proposals EW 2b and EW 2d – provide corrected boundaries on the proposals map and the aerial photograph of the Edinburgh Waterfront as shown within Appendices B and C of the council's response to further information request 20, with the exception that the area to the north of the proposed school (as shown within Appendix A) should be included within Proposal EW 2b rather than Proposal EW 2d, to accord with the existing diagrams in Table 11. The boundary between proposals EW 2b and EW 2d on the

existing proposals map should therefore be retained, with the added inclusion within EW 2b of the additional area of housing led mixed use development shown in Appendix A.

16. Proposal EW 2d – amend the notation for the diagram from “Business and Industry area” to “Temporary Light Industrial Uses and Housing”.

17. Proposal EW 2b – amend the diagram to show the 5 blocks of housing led mixed use development to the south of the new street (east to west) referred to in the representation on behalf of the National Galleries of Scotland, Royal Commission on the Ancient and Historical Monuments of Scotland and Historic Environment Scotland, with a new colour, and being identified as “cultural use or housing led regeneration” within the key.

18. Proposal EW 2b – amend the final bullet point of the development principles as follows:

expressly encourage the enhancement of employment and a ‘destination’ through existing and new commercial, cultural, tourist and retail opportunities

19. Proposal EW 2c – amend the third bullet point as follows:

meet the convenience shopping needs of new and future residents by implementing the proposed local centre (Proposal S2)

20. Proposal EW 2c – amend the fifth bullet point as follows:

provide for retained and improved mooring facilities and boat storage and retain Middle Pier as a ‘working pier’

21. Policy Del 4 – add a new criterion after criterion c):

the provision of open space in order to meet the needs of the local community, create local identity and a sense of place

West Edinburgh

22. Policy Emp 4 – amend the first sentence as follows:

The development and enhancement of Edinburgh Airport will be supported within the airport boundary defined on the proposals map. The approved masterplan will inform this process.

23. Paragraph 196 – amend the first sentence as follows:

The purpose of this policy is to guide proposals for airport expansion in accordance with National Planning Framework 3. Further planning guidance is set out in the West Edinburgh Strategic Design Framework (WESDF).

24. Policy Emp 5 – amend the first sentence of the second paragraph as follows:

All development proposals within the RHC boundary must accord with other relevant local development plan policies, and the West Edinburgh Strategic Design Framework (WESDF) provides further guidance for such development proposals.

25. Policy Emp 5 – add new paragraph after the second paragraph:

The site of the Royal Highland Centre may be required for airport uses in the long term to meet air passenger growth forecasts. Therefore, development which would prejudice the long-term expansion of Edinburgh Airport will not be supported, except where it is compatible with the current use of the site by the Royal Highland Centre, in the context of this policy.

26. Paragraph 197 – replace the second sentence with the following 2 sentences:

The policy also safeguards the site for the long term expansion of Edinburgh Airport, and in turn safeguards land at Norton Park to the south of the A8 for the long term relocation of the RHC, in accordance with National Planning Framework 3. Further planning guidance on the long term expansion of Edinburgh Airport is set out within the Edinburgh Airport Masterplan.

27. Table 2 – Special Economic Areas – amend the text relating to the International Business Gateway as follows:

National Planning Framework 3 identifies West Edinburgh, including the International Business Gateway, as being a significant location for investment. The International Business Gateway is a key location to attract international markets and secure appropriate business led mixed use development. It will come forward in a series of phases incorporating business development and supporting uses. The supporting uses include an opportunity for housing development as identified in Table 4. The Development Principles in Part 1 Section 5 identify the requirements for the consideration of proposals for the IBG through the development management process, indicating how business development and other uses can be accommodated together.

28. Table 4 – add the following to the estimated number of houses: to be confirmed through the masterplan process. Amend the comments as follows:

An opportunity for housing development as a component of business-led mixed use proposals is identified. However this is subject to further consideration through the masterplan process in terms of the extent that this would contribute to place making and sustainable development objectives and to the primary role of the site in supporting strategic airport enhancement and international business development. The continuing masterplan process for the IBG will demonstrate the relative balance of uses that would be appropriate. The development principles in Part 1 Section 5 identify the requirements for the consideration of proposals for the IBG through the development management process. Proposals must also accord with the provisions of Policy Emp 6.

29. Policy Emp 6 – amend the final bullet point as follows:

Housing as a component of a business led mixed use proposal subject to further consideration through the masterplan process, appropriate infrastructure provision and where consistent with the objectives of the National Planning Framework.

30. Policy Emp 6 – amend the final paragraph of the policy as follows:

All IBG proposals must accord with the IBG development principles and other relevant local development plan policies. The West Edinburgh Strategic Design Framework

(WESDF), supported by masterplans where appropriate, provides further guidance for development proposals, including guidance about the required contributions towards meeting the mode share targets.

31. Paragraph 198 – amend the first sentence as follows:

The purpose of this policy is to support the development of this nationally important economic development opportunity and ensure proposals accord with National Planning Framework 3. Further planning guidance is set out in the West Edinburgh Strategic Design Framework (WESDF).

32. Paragraph 198 – add new sentence after the third sentence as follows:

New housing will support placemaking and sustainability objectives.

33. Development principles page 54 – amend the description as follows:

International business development and ancillary uses, hotel and conference facilities and potentially housing and education. A more detailed vision for the area is set out in the West Edinburgh Strategic Design Framework, approved in May 2010. Policy Emp 6 applies.

34. Development principles page 54 – insert additional bullet points as follows:

- any necessary road infrastructure improvements should be identified, taking into account the general development principles for West Edinburgh and the relevant transport proposals listed in Table 9. Car parking provision for all uses should be set at levels which help achieve sustainable transport objectives in the context of Policy Tra 2.

- the central parkland area of open space will be of particular importance in meeting the council's large greenspace standard and should be designed and maintained accordingly.

- a flood risk assessment shall be carried out in order to inform the capacity, design and layout of development proposals.

35. After development principles page 54 – delete diagram.

36. Development principles page 56 – insert an additional bullet point under the heading "General" as follows:

- A flood risk assessment shall be carried out in order to inform the design and layout of development proposals. Consideration should be given to any culverted watercourses within the site and pluvial flooding.

37. Table 2 – RBS headquarters, Gogarburn – remove the words "single user" from the first line.

38. Policy Emp 7 – remove the word "headquarters" from the second line.

Appendix 1																
Contribution of sites in Housing Land Audit 2013 to LDP Housing Land Requirement																
Waterfront Sites extract for Issue 20 Schedule 4																
HLA ref.	Site name	Developer	Capacity	Complete by March 2013	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2013 to 2024
HLA Sites																
3105	West Shore Road - Forth Quarter	Secondsite Property	1037	0	0	0	0	0	0	0	0	50	50	75	75	250
3424	Western Harbour	Forth Properties Limited.	1409	0	0	0	0	0	0	50	50	50	50	75	75	350
3424.7	Lindsay Road	Port of Leith HA	111	36	35	40	0	0	0	0	0	0	0	0	0	75
3733A	Waterfront - WEL - Central Dev Area	Various	1604	0	0	0	0	0	0	0	50	50	50	50	50	250
3733A.1	Granton Park Avenue	Buredi + Waterfront Edinburgh Ltd.	95	14	0	0	40	41	0	0	0	0	0	0	0	81
3733A.4	Granton Park Avenue	Places For People Developments	56	19	37	0	0	0	0	0	0	0	0	0	0	37
3744	Granton Harbour*	Various	2626	0	0	0	0	0	0	0	50	50	75	75	75	325
3744.5	Granton Harbour - Plot 28	GSF Homes Ltd.	120	80	40	0	0	0	0	0	0	0	0	0	0	40
4894	WAC 1c: Salamander Place	Teague Developments Ltp	781	0	25	25	50	50	50	50	50	50	50	50	50	500
Total contribution from effective sites					**137**	**65**	**90**	**91**	**50**	**100**	**200**	**250**	**275**	**325**	**325**	**1,908**
Sites recorded as constrained in HLA 2013																
HLA ref.	Site name	Developer	Remaining Capacity		2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2013 to 2024
Constrained sites contributing to LDP requirement																
3424.1	Western Harbour - Platinum Point	Gregor Shore Plc.	226		0	0	0	0	0	0	26	50	50	50	50	226
3424.6	Western Harbour View	A B Leith Ltd	258		0	0	0	0	0	25	25	50	50	50	58	258
3733A.5	Waterfront Avenue: Upper Strand Phs 2	Upper Strand Developments Ltd Waterf	64		0	0	0	0	0	0	30	34	0	0	0	64
3744.2	Granton Harbour	Gregor Shore PLC.	160		0	0	0	0	0	0	40	40	40	40	0	160
3744.3	Granton Harbour - Plot 3	David Wilson Homes.	131		0	0	0	0	0	0	25	25	25	25	31	131
3744.4	Granton Harbour - Plot 31	Applecross Properties.	97		0	0	0	0	0	0	25	25	25	22	0	97
3744.6	Granton Harbour - Plot 29	Hart Estates Ltd.	36		0	0	0	0	0	36	0	0	0	0	0	36
4893	WAC 1b: Leith Docks*	Forth Ports	18000		0	0	0	50	50	100	100	200	200	200	250	1,150
Total contribution from constrained sites					**0**	**0**	**0**	**50**	**50**	**161**	**271**	**424**	**390**	**387**	**389**	**2,122**
Total					**137**	**65**	**90**	**141**	**100**	**261**	**471**	**674**	**665**	**712**	**714**	**4,030**
* Total capacities for Granton Harbour and Leith Docks are as identified in HLA 2013. Capacity revisions due to applications/LDP changes will be updated in HLA 2014, but due to the sites' sizes do not																

affect assumptions of programming in period to 2024.																
Constrained sites not contributing to requirement																
3733B	Waterfront - WEL - North Shore	Various	850													

Issue 21	**Developer Contributions Policies**	
Development plan reference:	**Part 2 Section 1 pages 76-78**	**Reporter:** Allison Coard

Body or person(s) submitting a representation raising the issue (including reference number):

0245 West Lothian Council	2279 Hallam Land Management Ltd
0698 David Wilson Homes and J & J Muir	2290 Edinburgh Developers' Group (Edinburgh Chamber of Commerce)
0749 Cramond and Harthill Estate	2402 West Craigs Ltd
0799 NHS Lothian Public Health & Health Policy	2505 Scottish Wildlife Trust
0828 Network Rail	2683 Scottish Enterprise
1159 New Ingliston Limited	2684 Homes for Scotland
1202 Land Options East	2703 Ogilvie Homes
2088 Scottish Government	2708 Royal Highland & Agricultural Society of Scotland (RHASS)
2126 Cockburn Association	2709 Scottish Property Federation
2192 Edinburgh Bioquarter Partners	
2276 Gladman Developments Ltd	

Provision of the development plan to which the issue relates:	These policies set out criteria to be considered in relation to developer contributions.

Planning authority's summary of the representation(s):

CONTEXT

Infrastructure provision was the subject of a question in the Main Issues Report. Question 9 sought opinion on the preferred approach to seeking developer contributions towards infrastructure provision. The Plan sets out a new approach to developer contributions and infrastructure provision which is closely aligned with the Second Proposed Action Programme.

Policy Del 1 – Developer Contributions

- Policy Del 1 should comply with Circular 3/2012. **(0698 David Wilson Homes and J&J Muir; 1202 Land Options East)**
- The principle reference for developer contributions should be Circular 3/2012 and no additional duplication in the form of Planning Guidance is necessary. **(2192 Edinburgh BioQuarter Partners; 2683 Scottish Enterprise)**
- Any contribution requests must be robustly evidence based and must be reasonably required in order to mitigate harm arising specifically from the development to which they relate, with particular reference to those developments not identified in Tables 2, 3, 4 and 10. Developer contributions can only be required where there is a proven demonstrable harm created by way of a development proposal and where alternative remedies to that harm (such as conditions) are ineffective. **(2276 Gladman Developments Ltd)**
- The clarity of Policy Del 1 needs to be improved as it does not fully explain how

required infrastructure costs will be shared between individual proposals. **(2279 Hallam Land Management Ltd)**

- Objecting to Policy Del 1 on the basis of the related Action Programme. It is premature for the Council to set out the various requirements for the site prior to a planning application being submitted. Until an application is submitted the Council cannot fully assess the scale and kind contributions. **(2402 West Craigs Ltd)**
- Policy Del 1 should more accurately reflect Circular 3/2012. It is not clear what 'net impact' is for the purpose of this policy. This could be interpreted as requiring a developer contribution whenever there is any net change to infrastructure capacity, not just when it gives rise to a deficiency. There should be a requirement for a development linked infrastructure deficiency to be present before a development contribution is taken. A developer contribution will only be requested when it is absolutely necessary to make a development. **(2684 Homes for Scotland)**
- Neither Policy Del 1, nor its supporting sub-text, make clear how the Council proposes to ensure that the level of developer contributions sought will not threaten the overall viability of the development in question. Reference requires to be made within the terms of the policy itself to the effect that matters of development viability will be taken into account. Reference should be made to the fact that all planning obligations will require to accord fully with the policy guidance which is set down within Circular 3/2012. **(2703 Ogilvie Homes)**
- The first and key part of Policy Del 1 is consistent with Scottish Government guidance. The following paragraph is not. Contributions are not made on the basis of the first part of Policy Del 1 but on the basis of what the Council prescribes in the Action Programme. There is no reasonable basis for this. The Action Programme requires critical review and examination both in terms of the improvements listed and the costs associated with them. This should be transparent and costs verified and agreed with potential funding sources. Only improvements required to mitigate the impact of proposals should be included. **(2708 Royal Highland & Agricultural Society of Scotland (RHASS)**
- Supports policy providing that proposals do not jeopardise the safety, reliability and efficiency of rail infrastructure. Encourage the inclusion of a policy statement which makes it clear that no new level crossings will be permitted, that proposals which increase the use of level crossings will generally be resisted and where development would prejudice the safe use of a level crossing an alternative bridge crossing will be required at the Developer's expense. **(0828 Network Rail)**

Supports Policy Del 1

- **(2709 Scottish Property Federation)**

Supplementary Guidance

- Further details needed of the locations and types of development that will be required to make contributions and clarity over the items for which contributions will be sought. Details of the actual level of contributions to be sought and methodology used to calculate this is to be included in statutory Supplementary Guidance. **(2088 Scottish Government)**
- Welcomes the Delivering the Strategy section and the Action Programme but believes there can be more pragmatic improvements in the Plan and Action Programme to promote a more efficient handling of major applications towards Committee decisions. There should be a stronger connection from Plan to action.

(2290 Edinburgh Developers' Group (Edinburgh Chamber of Commerce)

- The Developer Contributions and Affordable Housing Guidance must be revised to reflect the updated proposals in the Second Proposed Plan and re-consulted upon. **(2279 Hallam Land Management Ltd)**

Other contributions

- Health and social care infrastructure is not listed and should be included as a developer contribution. New housing and new residents create demands on health and social care in the same way as they create demands on schools, traffic management, transport improvements and green space. **(0799 NHS Lothian Public Health & Health Policy)**
- Improvements to the public realm/environment, where appropriate, should be included in the infrastructure requirements to facilitate the implementation of these policies. Unclear as to why developer contributions to public realm were rejected in the Schedule of Representations to the Main Issues Report. **(2126 Cockburn Association)**
- Developer contributions towards green space would accord with the Edinburgh Living Landscape partnership which will demonstrate that investment in green (and blue) infrastructure increases biodiversity and creates healthier urban ecosystems and makes economic sense by attracting inward investment. **(2505 Scottish WildlifeTrust)**

Policy Del 2 – Retrospective Contributions

- Policy Del 2 does not comply with the terms of Circular 3/2012. There remains an encumberant requirement that contributions are essential for a development to proceed. **(1202 Land Options East)**
- Objects in the strongest possible terms to Policy Del 2. Payment of retrospective contributions fall outwith the scope of Circular 3/2012. **(2703 Ogilvie Homes)**
- Objects to Policy Del2 as the Tram works have been completed and the 'area of influence is not set out in the Plan'. **(0698 David Wilson Homes and J&J Muir)**

Cross boundary contributions

- Full account must be taken of SDP Policy 8 which states that the LDP will take account of cross-boundary transport implications of all policies and proposals. There is a case for renewing and updating the proposed LDP and Action Programme to more fully reflect cross boundary issues. Newbridge roundabout is of strategic significance and there is a possibility that supplementary guidance for developer contributions may be required. **(0245 West Lothian Council)**

Site specific

- Concerned that in respect of HSG20 Cammo, the Council has still to establish when increased education provision is to take place, details of any changes to current school catchments, and preferred option to deliver the necessary secondary school infrastructure. Assumption that the Proposed LDP has been produced without all of the critical information regarding potential requirements for both primary and secondary school. **(0749 Cramond and Harthill Estate)**
- Objects to lack of West Edinburgh / International Business Gateway and suggests

inclusion of a Policy Del 6 to describe an approach to a West Edinburgh infrastructure delivery mechanism. **(1159 New Ingliston Limited)**

Modifications sought by those submitting representations:

Policy Del 1 – Developer Contributions

- Make clear that developer contributions will only be sought when they meet the test set out within Circular 3/2012. **(0698 David Wilson Homes and J&J Muir; 1202 Land Options East)**
- Policy Del 1 should include a direct reference to Planning Obligations as the principle means by which developer contributions will be sought. The Plan should refer to Circular 3/2012. **(2192 Edinburgh BioQuarter Partners; 2683 Scottish Enterprise)**
- Policy Del 1 should be amended: 'a) it will have a negative (or harmful) impact on infrastructure capacity; and b) it is necessary to mitigate that specific impact by providing additional capacity or otherwise improving existing infrastructure. For other proposals, individual assessments, including transport and/or education assessment, will be necessary to identify and harm arising from the development and the specific mitigation required'. **(2276 Gladman Developments Ltd)**
- Policy Del 1 should be amended 'Where developer contributions are required, these should be commensurate with the net impact of the proposed development on the infrastructure required to make the proposed development acceptable in planning terms. There should not be an expectation that developers will necessarily meet all or the majority of the costs associated with strategic infrastructure that is not solely required to make individual proposed developments acceptable in planning terms'. **(2279 Hallam Land Management Ltd)**
- Add text to Policy Del 1 c) any developer contributions being sought must be appropriate in scale and kind in relation to the proposed development; d) any developer contributions will only be agreed when planning applications are submitted to the Council. Delete any references to the Action Programme. **(2402 West Craigs Ltd)**
- Amend Policy Del 1 'a) it results in a deficiency in infrastructure capacity'. **(2684 Homes for Scotland)**
- Delete Policy Del 1 and if required, it be replaced by a policy that accords with the requirements set out within Circular 3/2012. **(2703 Ogilvie Homes)**
- Amend Policy Del 1 to reflect Circular 3/2012. Policy should make explicit reference to tests of scale and kind and contributions should be limited to those that make a proposal acceptable. Remove reference to link with Action Programme Approach. Typographical error in point b). **(2708 Royal Highland & Agricultural Society of Scotland (RHASS)**

Supplementary Guidance

- More detail required in Policies Del 1 and Del 2. Details of the actual level of contributions to be sought and methodology used to calculate this is to be included in statutory Supplementary Guidance. **(2088 Scottish Government)**
- Would welcome updates and policy-led initiatives in the city, such as the Edinburgh Planning Concordat. **(2290 Edinburgh Developers' Group (Edinburgh Chamber of Commerce)**
- Policy Del 1 should make specific reference to the Developer Contributions and

Affordable Housing Supplementary Planning Guidance that will support the Plan. **(2279 Hallam Land Management Ltd)**

Other contributions

- Amend Policy Del 1 to include health and social care infrastructure. Policy Hou 10 should be amended to include a reference to provision of essential facilities. **(0799 NHS Lothian Public Health & Health Policy)**
- Improvements to the public realm should be included in infrastructure requirements. Add 5th bullet 'public realm actions'. **(2126 Cockburn Association)**
- Developer contributions should contribute to high quality, accessible, safe green space and by carefully selecting species contributing to biodiversity of Edinburgh in line with the Local Biodiversity Action Plan. **(2505 Scottish Wildlife Trust)**

Policy Del 2 – Retrospective Developer Contributions

- Remove Policy Del 2. **(0698 David Wilson Homes and J&J Muir; 1202 Land Options East)**
- Remove Policy Del 2 and replace with a policy that complies with Circular 3/2012. **(2703 Ogilvie Homes)**
- Remove or reword the 3rd sentence of paragraph 131. **(2088 Scottish Government)**

Cross boundary contributions

- Reference to cross boundary contributions for Newbridge Roundabout. Proposal T12 in Table 9 and the Action Programme should be amended to include reference to the A89 and A8. Table 9 should be referred to in Policies Del 1 and Del 2 and supporting text amended to include a reference to cross-boundary agreement. The text should include reference to Supplementary Guidance for developer contributions. **(245 West Lothian Council)**

Site specific

- The Plan and Action Programme must provide a detailed breakdown of what is required in relation to developer contributions for education provision. **(0749 Cramond and Harthill Estate)**
- Seeks a new policy - 'Policy Del 6' - to describe an approach to a West Edinburgh infrastructure delivery mechanism. Wishes to engage in a dialogue on this matter. Understands that such a dialogue has been commenced by the Convenor of Planning and the Scottish Property Federation. Welcome a delivery section to emphasis progress on Action Programme and the critical points regarding completion of the Action Programme within three months of the adoption of the LDP and annual updates. Specify in the objectives that fair and reasonable contributions are sought in line with Circular 3/2012. **(1159 New Ingliston Limited)**

Summary of responses (including reasons) by planning authority:

Policy Del 1 – Developer Contributions

- No modification proposed, however, the Council in part sees merit in these representations but does not consider that specifically referring to Scottish Government policy by name/date (i.e. Circular 3/2012) in the Plan is appropriate due to the potential for policy to be superseded over the plan period. Should the

Reporter be so minded, the Council would see merit in a modification to Part 2 Section 1 – Delivering the Strategy, paragraph 1.25 Objectives, bullet 1, to read "To implement the Council's approach to infrastructure provision and improvements associated with development taking account of current economic conditions and Scottish Government planning policy and guidance". **(0698 David Wilson Homes and J&J Muir; 1202 Land Options East; 2192 Edinburgh BioQuarter Partners; 2683 Scottish Enterprise, 2703 Ogilvie Homes; 2708 Royal Highland & Agricultural Society of Scotland (RHASS))**

- The term 'harm' is not accepted as it is not defined, is subjective and is reliant on a value judgment rather than assessment of the impact of development on infrastructure. With regards to other proposals, not identified in Tables 2, 3, 4 and 10 in the Plan, individual assessments, including transport and/or education assessment, may be necessary to identify any impacts and whether mitigation is required. In this regard, the Action Programme approach allows for this assessment to be carried out and if there is a net impact, an action (and if required a contribution zone) to mitigate this impact would be established. Guidance on Developer Contributions and Affordable Housing sets out when assessment of impact on infrastructure is required. No modification proposed. **(2276 Gladman Developments Ltd)**
- Policy Del 1 apples where development would either; create a direct need for additional infrastructure capacity (i.e. a net impact); or a cumulative impact; or have an impact on green space or public realm. The policy only allows a contribution be sought where both criteria a) there being a 'net impact' and Part b) it being necessary to mitigate this impact apply. The policy only applies where there is evidence to demonstrate that there are no existing deficiencies in infrastructure provision, and that there is not capacity to accommodate the development despite there being a net impact. No modification proposed. **(2684 Homes for Scotland; 2279 Hallam Land Management Ltd)**
- In preparing a LDP the planning authority are to have regard to the resources available or likely to be available for the carrying out of the policies and proposals set out in the local development plan (The Town and Country Planning (Development Planning) (Scotland) Regulations 2008, 10, 1(a)). The impact of plan led development on existing transport and education infrastructure is provided in the relevant accompanying Revised Education Appraisal June 2014 (corrected September 2014) and Addendum to Transport Appraisal (June 2014) Where there is a net impact on infrastructure, these appraisals set out the infrastructure requirements appropriate to the developments proposed. Scottish Government guidance states that infrastructure requirements should be identified in local development plans and Policy Del 1 sets out the Council's approach in respect of the planned growth set out within the Plan linking with the statutory Action Programme. Scottish Planning Policy, Paragraph 31 outlines that Action Programmes should be actively used to drive delivery of planned developments. There is no need to refer to the timing of when developer contributions are set for an application.

  The Action Programme sets out actions to help mitigate the impact of strategic and planned growth and to deliver the proposals identified within the Plan. The approach takes into account the cumulative impact of a number of proposed developments. Approved guidance on Developer Contributions and Affordable Housing (February 2014) sets out how costs are to be shared proportionately in terms of scale and kind. The Council in part sees merit in representation requesting that the next iteration of the Developer Contributions and Affordable Housing Guidance (February 2014) is published as Supplementary Guidance. The

Council would see merit in a modification to guidance on Developer Contributions and Affordable Housing being prepared as statutory supplementary guidance (see section below). No modification proposed. **(2402 West Craigs Ltd; 2708 Royal Highland & Agricultural Society of Scotland (RHASS); 2279 Hallam Land Management Ltd)**

Supplementary Guidance

- No modifications proposed, however, the Council sees merit in representations requesting that the Developer Contributions and Affordable Housing Guidance (February 2014) is prepared as Supplementary Guidance. The Council would agree to a modification to Paragraph 9 of the plan to include preparing supplementary guidance on Developer Contributions and Affordable Housing including the requisite statutory consultation. **(2088 Scottish Government; 2290 Edinburgh Developers' Group (Edinburgh Chamber of Commerce; 2279 Hallam Land Management Ltd)**

Other contributions

- The Plan in paragraph 72 acknowledges that housing proposals will have implications for the provision of primary care and other community health services. Paragraph 130 of the Plan states that developer contributions to measures intended to mitigate the net effects of development, other than actions identified in the Action Programme, may also be required. Policy Hou 10 Community Facilities ensures that new housing development goes hand in hand with the provision of a range of community facilities where this is practical and reasonable. Growth allocations have been discussed with the Edinburgh Community Health Partnership. No specific actions have been identified for inclusion in the Action Programme at this time, however should suitable actions be identified these will be included in future iterations of the Action Programme. Where these are needed partly to address demand impact arising from new development, the share of cost and contribution zone will be identified. No modification proposed. **(0799 NHS Lothian Public Health & Health Policy)**
- Contributions towards public realm improvements are dealt with in paragraph 128, bullet 3, and within guidance on Developer Contributions and Affordable Housing Guidance (February 2014). No modification proposed. **(2126 Cockburn Association)**
- Contributions towards green space are dealt with in Paragraph 128, bullet 4, the Council's approved Open Space Strategy, Policies Env 18 Open Space Protection, Env 19 Playing Fields Protection, Env 20 Open Space in New Development and within guidance on Developer Contributions and Affordable Housing (February 2014). No modification proposed. **(2505 Scottish Wildlife Trust)**

Policy Del 2 – Retrospective Developer Contributions

- Policy Del 2 applies to the use of planning obligations towards high cost infrastructure such as the Tram, identified in the Action Programme, for which have been delivered through borrowing. The Report of Inquiry to the Edinburgh City Local Plan (pages 3-122 to 3-126) found the use of planning obligations towards the construction of the tram network, and the collection of retrospective contributions after the construction works were completed, acceptable. The Report of Inquiry found that such an approach accorded with guidance set out in Circular

12/96 (now superseded). Edinburgh City Local Plan Policy Tra 3 supporting planning guidance implemented to this effect. Circular 3/2012 in paragraph 23 recognises that planning authorities should give consideration to the possibility of infrastructure being funded, and development thus enabled, through other mechanisms, with costs being recovered through staged payments as development progresses. Policy Del 2 implements this approach. No modification proposed **(0698 David Wilson Homes and J&J Muir; 1202 Land Options East; 2703 Ogilvie Homes; 2088 Scottish Government)**

Cross boundary contributions

- It is noted that LDPs should take account of the cross boundary transport implications of all policies and proposals. The study that Transport Scotland is currently progressing with the SESplan authorities is intended to address cross boundary impacts of the development proposals. The scope is agreed and Transport Scotland is contributing to the study. The outputs of the study will inform future annual iterations of the Developer Contribution and Affordable Housing Guidance and the LDP Action Programme as appropriate. No modification proposed. **(0245 West Lothian Council)**

Site specific

- A detailed breakdown of what is required in relation to developer contributions for education provision for LDP sites has been assessed within the accompanying Revised Education Appraisal June 2014 (corrected September 2014), the approved Developer Contribution and Affordable Housing guidance (February 2014). No modification proposed. **(0749 Cramond and Harthill Estate)**
- Infrastructure actions for West Edinburgh are set out within the LDP Action Programme (pages 15 – 17). The Action Programme, Policies Del 1 and 2, and the accompanying Developer Contributions and Affordable Housing Guidance set out the delivery mechanism in line with Circular 3/2012 The Action Programme is intended to be a 'live' document and will be updated on an annual basis following its adoption. No modification proposed. **(1159 New Ingliston Limited)**

Reporter's conclusions:

Background

1. The conclusions below should also be read in the context of Issue 5 which references wider concerns about infrastructure delivery which are also raised in the context of specific sites. Issue 19 is also relevant in setting the context for consideration of transport delivery issues. There are also concerns that the timing of delivery and the approach to developer contributions could impact on the housing land supply.

2. The issues raised in this schedule 4 concern the specific terms of policies Del 1: Developer Contributions and Del 2: Retrospective Developer Contributions and the text associated with those policies, all as set out in the proposed plan under the section heading Delivering the Strategy. The council points out that this particular section of the plan sets out a new approach to developer contributions and infrastructure provision that is closely aligned with the Second Proposed Action Programme – as updated in May 2015.

3. I am concerned to ensure that the council's policies related to Developer Contributions set out in the plan are in accordance with Circular 3/2012: Planning Obligations and Good Neighbour Agreements, published in December 2012. Representations raise concerns that the plan itself is not clear about where and on what basis developer contributions will be sought with an associated over-reliance on non-statutory guidance and on the Action Programme.

4. Further Information Request 6 was issued in order to seek clarification on the council's position regarding these various matters. Those that made original representations then had a further opportunity to comment on the council's response. Those various exchanges of views have been taken into account in my overall assessment as set out below.

Circular 3/2012 and Circular 6/2013

5. Circular 3/2012 ("the 2012 Circular") points out at the outset that Scottish Planning Policy underlines the important role of the planning system in supporting the Scottish Government in seeking to promote sustainable economic growth. This is underpinned through its commitment to an inclusive plan-led system, with planning applications being determined through a transparent process of decision-making. Circular 6/2013 on development planning ("the 2013 Circular") in paragraph 139 distinguishes between the role of the development plan and that of Supplementary Guidance. Here it clearly states that Supplementary Guidance should not include "items for which financial or other contributions, including affordable housing, will be sought and the circumstances, locations and types of development where they will be sought." These matters should rather be addressed in the plan itself, which is subject to examination.

6. The 2013 Circular states it is suitable for Supplementary Guidance to address the exact levels of developer contributions or methodologies for their calculation. There is a stated requirement in paragraph 138 that Supplementary Guidance "should be limited to the provision of further information or detail in respect of policies or proposals set out in the SDP or LDP. The Circular states "There must be a sufficient 'hook' in the SDP or LDP policies or proposals to hang the Supplementary Guidance on, in order to give it statutory weight."

7. A separate section of the 2013 Circular on Action Programmes describes their role in setting out a list of actions to deliver each of the plan's policies and proposals, the name of the person who is to carry out the action and the timescale for carrying out each action. The first of these is to be submitted to Ministers within three months of adoption of the plan and following this they should be updated and republished at least every two years. Accordingly it is my understanding that it would not be appropriate to introduce new matters through the Action Programme or specify additional items of infrastructure or the means through which they are to be delivered without first establishing these through the development plan.

8. The 2012 Circular "sets out the circumstances in which planning obligations and good neighbour agreements can be used and how they can be concluded efficiently. Planning authorities should promote obligations in strict compliance with the tests set out in this circular. The requirement for planning obligations should be identified as soon as possible and relevant parties brought together to ensure that the process flows as smoothly as possible."

9. The 2012 Circular goes on to detail Scottish Government policy on the use of planning obligations, including unilateral obligations, and good neighbour agreements made under sections 75 and 75 D respectively of the Town and Country Planning (Scotland) Act 1997 as amended by the Planning etc. (Scotland) Act 2006. This makes clear that it is not possible to indicate all circumstances in which planning obligations are appropriate, but states that planning authorities should take decisions based on the relevant development plan, the proposed development and the tests set out in the Circular. In summary, it states in paragraph 13 that where a planning obligation is considered essential it must have a relevant planning purpose and must always be related and proportionate in scale and kind to the development in question. Those principles are elaborated in the form of policy tests set out in the 2012 Circular under the following sub-headings:

- The necessity test
- The planning purposes test
- The relationship to proposed development test
- The scale and kind test
- The reasonableness test.

10. As echoed in the 2013 Circular referred to earlier, the 2012 Circular makes clear in paragraph 30 that "the development plan should be the point at which consideration of potential need for and use of planning obligations begins. The adoption of formal policies on the use of planning obligations is strongly encouraged. These create an opportunity to involve the local community and development industry in the process of plan policy development including supplementary guidance, and to clarify early the expected costs of any contributions that might be sought from developers." Paragraph 32 states that "Broad principles, including the items for which contributions will be sought and the occasions when they will be sought should be set out in the SDP or LDP, where they will have been subject to scrutiny at examination. Methods and exact levels of contributions should be included in statutory supplementary guidance." Further clarification on that last matter is provided in paragraph 35 which states "Statutory supplementary guidance must be derived from the strategic or local development plan and be the subject of consultation."

11. In summary, I consider the 2012 and 2013 Circulars provide clarity on the respective roles of the plan, statutory Supplementary Guidance and Action Programmes with regard to identifying items for which financial or other contributions will be sought and the methodology for doing so. The 2012 Circular sets parameters for an appropriate and transparent approach to seeking developer contributions. My assessment below is based on these considerations.

<u>Further Information</u>

12. The council has made clear in its response to the Further Information Request 6 that it regards the role of the plan, particularly policies Del 1 and Del 2 as being:

- to establish in the development plan the principles by which contributions will be sought; and
- to establish the use of contribution zones in order to facilitate a way of addressing cumulative impacts equitably across different sites and time periods.

13. It has then identified the roles of the Action Programme as including:

- setting out the site-specific actions needed to deliver the LDP's growth, including responsibility and timing for actions;
- providing a vehicle for the council to plan and deliver corporate capital investment in alignment with the LDP;
- providing a transparent mechanism for the council to forward and gap fund infrastructure items where the tests of Circular 3/2012 means that developer contributions cannot;
- (potentially) providing a vehicle for council partners to do likewise – for example for primary healthcare infrastructure;
- providing an up-to-date responsive document that is publicly reported for approval by elected officials.

14. The role of the associated guidance is described as to :

- provide details of specific costs, levels of contributions and the methodology by which they are calculated
- provide a calculation of the share of costs across relevant departments;
- provide a regular opportunity for consultation and Scottish Government oversight on these matters.

15. The council acknowledges that the Action Programme is not subject to any statutory right of consultation or independent scrutiny. However, it considers there is no duty of consultation on the processes by which the council plans infrastructure enhancements. There remains a right to appeal against the level of contributions and the principles of the approach will have been established through the local development plan. It is intended that the costs are shared cumulatively and proportionately within contribution zones. The Action Programme provides flexibility for review and update given that the contribution zones are not fully known at present and may need to change over time. The intended guidance would support the action programme providing detailed costs, calculations and methodologies.

16. However the council suggests a number of changes to clarify its approach. Most notably it proposes a change to paragraph 9 to add Policies Del 1 and Del 2 to the matters on which the council intends to prepare supplementary guidance. The remainder of this paragraph clarifies that this would in fact be statutory Supplementary Guidance as it goes onto state that this would form part of the development plan and be treated as such in determining planning applications. This is further clarified in the glossary which defines the term Supplementary Guidance. It also proposes inclusion of a Table of Financial and Other Contributions to be included as an appendix to the plan in order to clarify the circumstances in which the policy will be applied.

17. The council's submissions accept the need to establish some greater clarity about the definition of Cumulative Contribution Zones:

'The Action Programme identifies a number of infrastructure improvements which will help mitigate the effects of new development across a wide area. Contribution zones are identified for actions which are needed to address the impacts of more than one development. They arise from cumulative appraisals. These include the transport and education appraisals carried out by the Council during the plan preparation process.

Further cumulative appraisal work may inform future updates to the Action Programme and supplementary guidance. The geographical extent of a consultation zone relates to the type of action. School actions have contribution zones based on single or combined catchment areas. Transport actions have contribution zones based on simple distances to junctions and transport corridors.'

18. Other parties in response retain concerns about the clarity of the policy and the late introduction of reference to health care provision. Homes for Scotland has strong objections in principle to the use of developer contributions from home-builders to subsidise the provision of primary healthcare facilities. Provision is considered to be a matter for the healthcare authorities, funded through general taxation, whilst the role of the planning system is simply to ensure that land is available as and when new facilities are brought forward.

19. The responses re-iterate concerns about impacts on development costs and viability of individual sites. It is not considered appropriate that the Council can reserve the right to change the geography and boundaries of Contribution Zones at any future stage throughout the period of the Local Development Plan.

20. Amendment to the policy to reference the "infrastructure required to make the proposed development acceptable in planning terms" is suggested. It is also suggested that the policy should specifically state that contributions should be made based upon the impact of the developments proposed both individually or cumulatively and be consistent in all respects with government guidance outlined in Circular 3/2012 particularly the key policy tests. In this respect there are concerns that the mitigation stated in the action programme exceeds that necessary to address the individual and cumulative impacts of proposals.

21. An example is provided comparing the assessed requirements from the RHAS masterplan with those set out in the action programme. On this basis the representation suggests the action programme interventions seek to address existing deficiencies. Where the need to improve, upgrade or replace that infrastructure does not arise directly from development, then planning authorities should not seek to address this through a planning obligation

22. Submissions state that there is no information as to how the new education infrastructure will be delivered, or when it will be delivered. The council needs to make a clear commitment that it will deliver the schools and provide a timescale for delivery. It is not reasonable to expect developers to pay over significant sums of money without any visibility on how or when that money will be used. This may require the Council to forward fund the schools as is done by other local authorities. It is noted that the report to the Planning Committee on 6 August 2015 confirms that there is no allowance for the education and transport infrastructure costs within the Council's current Programme 2015-2020 or indicative five-year plan 2019/20 - 2023/24.

23. Specific concerns are raised about the council's draft guidance but this is not a matter for this examination.

24. The submission also references the approach to addressing transport impact. Any net impacts should be quantified as a direct result of the development proposed and where appropriate should be mitigated on the basis of nil net detriment. Such an approach would be consistent with government guidance and commensurate in scale and

kind with the proposed development.

25. There is concern that the establishment of Contribution Zones requires developers to fund strategic solutions to education capacity across Zones. The developer contributions sought in the Guidance are excessive and not directly related to the impacts of individual developments and have not been subject to consultation. The Education Actions in the Action Programme are presented as a strategic solution to the delivery of additional infrastructure. However, these actions are considered to be a wish list to be funded by developers. There is no indication in the Education Assessment that any consideration has been given to the most cost-effective way of providing the education infrastructure required.

26. Response to FIR 6 also states there is an inferred admission by the Council that the contribution zones as defined in the Action Programme, and currently being used by the Council in negotiating planning obligations, are not evidentially based nor fully known at this point. This raises issues in terms of, for example, the basis upon which the Council is negotiating developer contributions on current developments. This is particularly pertinent with regard to major developments on the edge of the City that may have potential cross-boundary actions.

Assessment

27. I consider the commitment to prepare Supplementary Guidance goes some way to address the matters raised in representation and the terms of both the relevant Circulars. Given the matters raised I consider that a policy context is required as reliance on the Circular alone would not provide sufficient clarity on the approach that would apply in an Edinburgh context. The guidance would support the principles established in the plan allowing further consultation and consideration of the detailed approach to implementation. In addition, to reference in paragraph 9, I consider this would also require clearer reference through the relevant policy and in the supporting text in order to establish a clear hook for this guidance. Paragraph 121 of SESplan states that mechanisms for calculating levels of contribution should be included in supplementary guidance in a way that assists landowners and developers.

28. Having accepted the need for such guidance the remaining issues relate to the general appropriateness of the council's approach to contributions and the relative balance of content between the plan, its supplementary guidance and the Action Programme.

29. From the submissions, I find no reason to conclude that the council is seeking to secure developer contributions for education or transport infrastructure improvements as a means of simply addressing existing deficiencies. However I consider the basis for seeking contributions could be more clearly expressed within the parameters set by the 2012 Circular.

30. To achieve compliance with the 2012 Circular I consider revision of Policy Del 1 is required to establish the broad principles, including the items (generally) for which contributions will be sought and the occasions when they will be sought. I find this can be addressed by expanding the policy and through cross reference to an appendix (similar to that submitted by the council) which will detail the circumstances where contributions will be sought. Following on from that I consider the policy needs to establish the appropriate hook for Supplementary Guidance which once approved will carry the weight of the

development plan. This should establish the methods and exact levels of contributions.

31. On a related matter I note representations requesting a new policy to address specific delivery issues in West Edinburgh. There is also concern about a lack of clarity about the required education infrastructure in West Edinburgh and as to how cross boundary/cumulative impacts on Newbridge would be addressed. Cross reference to Issues 5 and 19 and the various site specific issues indicate these sort of matters are a re-current theme through the examination.

32. Issue 19 includes a specific policy on cross boundary transport issues and my conclusions indicate that an expanded Policy Del 1 is also required. However, I consider a coherent approach also requires a means of pulling together the various references in Tables 5 and 9, in the Action Programme and as referenced through our site specific conclusions so that the likely scope of required mitigation relevant to specific areas and the need for further assessment is more transparent.

33. There are remaining uncertainties around the sufficiency of the council's approach to transport assessment and further details on the preferred options for education and the means of delivery that highlight the need for further assessment. This is particularly important given our conclusions that securing the necessary mitigation at the right time is fundamental to the principle of development on a number of sites included in this plan. Consequently, I consider that all of this should be more clearly referenced through Part 1 Section 5 of the plan.

34. This would enable a direct link between Policy Del 1 and the area specific mitigation. This would set the parameters for the required Supplementary Guidance but also for any masterplan/development management process. I note the submission that the impacts of any development and the required mitigation would only be confirmed through further detailed assessment at the planning application stage. I accept there is merit in this reasoning. However, I consider that clarity regarding the anticipated requirements at this stage provides a firmer basis for such assessment.

35. Consequently, my recommendations below include General Development Principles relating to the scope of the required infrastructure provision in each of the main development areas. My recommendations are based on the initial assessment carried out by the council in its education and transport appraisals as submitted to the examination. However, more detailed assessment of these matters will be required through the preparation of the proposed Supplementary Guidance, the completion of the cross-boundary transport study and through the master-planning/development management process for major developments. This would also provide a context for the assessment of any new sites which may be progressed through the terms of Policy Hou 1. Matters relating to cumulative impacts in the water-front area are handled separately through our recommendations on Issue 20. For other sites/areas not included below no change is proposed other than as recommended through the relevant site specific issue.

36. I recognise concerns about a lack of consultation on the potential scope of the required mitigation and about compliance with the 2012 Circular. In this respect the General Development Principles are referenced in the context of initial appraisal to provide some flexibility and scope for further refinement. The identification of specific interventions based on the council's appraisal's to date should assist in setting the parameters for the Supplementary Guidance.

37. I also recognise from the council's and other submissions to the hearings held on the 18 and 19 November that there is uncertainty about the scale of the required contributions and the potential need for forward and gap funding. These issues are evidenced in the council's submission of the report to the finance committee on 6 August 2015. The council recognise an emerging funding gap given that anticipated developer contributions are unlikely to be sufficient to provide all the infrastructure that is required to support the development strategy. I consider the council should recognise these issues in the context of the policy and supporting text of Policy Del 1 and include a commitment to provide further clarity and detail through preparation of the required Supplementary Guidance.

38. I also endorse the view expressed in representations that in criterion a) of Policy Del 1, the term "net impact" is not sufficiently clear in its meaning. It is important to be clear that in the terms of the Circular new development is not required to address an existing deficiency. The council has explained that the intention is to ensure that developments that are likely to bring a net reduction in demands on infrastructure capacity are not required to make developer contributions – and it gives an example of one such situation. I consider that the intention of the policy would be clearer if the word "net" were replaced by "negative" and by adding "either on an individual or cumulative basis" in the introductory paragraph. I do not consider that it is necessary to specifically cover all the tests in the circular as long as the intent is clear. Rather than refer to making the development acceptable in planning terms I consider that it is sufficient to make it clear that contributions will only be sought where there is a negative impact on infrastructure capacity and that contributions will only be sought where mitigation is required in relation to that impact, that is, the impact of the proposed development, on an individual or cumulative basis. This will ensure that any contributions sought are reasonably related and commensurate to the scale of the proposed development. My recommendation reflects this.

39. In terms of the content of the plan itself I consider that rather than include mapping of the zones at this stage, when these have not been the subject of consultation and review, the plan should go further in explaining the nature of Contribution Zones and how these would apply. Further clarity regarding the spatial implications for infrastructure delivery would also be provided by my recommendations below (to include General Development Principles) which attribute specific actions/mitigation to the main development areas as identified in Part 1 Section 5 of the plan.

40. I consider that the Contribution Zones should be identified in Supplementary Guidance. Leaving the identification and application of these zones to an Action Programme which is subject to annual review, as proposed by the council, would not achieve the required degree of clarity or certainty.

41. There is a fine line to be drawn between clarity and flexibility. I do not consider that the latter should be achieved at the expense of creating uncertainty for users of the plan who are seeking to progress proposals or for communities seeking surety that the required infrastructure will be delivered. Whilst the Action Programme has a key role in support of the plan I do not consider there to be a remit to introduce new matters or approaches which are not established through the development plan.

42. Consequently I find that greater emphasis should be placed on clarity in the plan itself and through Del 1 and its associated Supplementary Guidance. The role of the Action Programme would then have a clearer focus on setting out a list of actions to

deliver each of the plan's policies and proposals, the name of the person who is to carry out the action and the timescale for carrying out each action.

43. I find merit, with some limited exception, in including the table of Financial and Other Contributions as proposed by the council as an appendix to the plan. The items for which contributions are sought are currently stated in the proposed plan in paragraph 128 as:

- School capacity increases, including new schools
- Traffic management, including junction improvements
- Other transport improvements, including the Edinburgh tram project and public realm
- Green space actions.

44. The list of items in the council's table reflects those items listed in paragraph 128 of the plan but adds a new heading "Primary healthcare infrastructure capacity".

45. Representations on specific sites raise concerns about the capacity of local health facilities and I appreciate the importance of this consideration. Through Issue 23 I note that Policy Hou 10 references health care provision but not the mechanism for its delivery. I have recommended an addition to the text on Policy Hou 10 to clarify that this requirement only applies "relative to the impact and scale of the development proposed". It may be that such provision can be facilitated through the Community Planning process or otherwise through consultation and agreement. I note the argument that such provision is financed through general taxation.

46. The land use planning justification for the other items referenced in Del 1 relies on the work the council has carried out on the assessment of transport, education and open space. Notably no such research or justification for seeking contributions towards health care provision has been provided in this examination. Responses to FIR 6 question the proposed late introduction of this matter in relation to Policy Del 1 without any appropriate justification.

47. In the absence of current information or justification of the scale of any additional provision that might be required, there is no certainty, at present, on the associated need for contributions. To add this requirement now, would, I consider, be contrary to the terms of the 2012 Circular. Consequently, I am not convinced that the list of items relevant to Policy Del 1 should be expanded to cover health care infrastructure. Circular 2012 recognises that the plan cannot cover every circumstance. In the absence of any current justification I am content that other matters, which may necessitate a developer contribution, are addressed on a case by case basis in the context of the tests set out in the circular.

<u>Conclusions on Policy Del 1</u>

48. I recognise the importance of a clear approach to infrastructure delivery not only to address the representations listed under this issue but also to address the significant community and other concerns expressed in relation to schools capacity and transport issues in relation to specific sites and areas within the city.

49. Drawing together all of the considerations above and to address related concerns raised elsewhere in this examination my recommendations include consequent revisions to DEL 1 and its supporting text in order to:

- Clarify the respective roles of the plan, Supplementary Guidance and the Action Programme in accordance with the roles of these documents as set out in the relevant Circulars.

- Provide a clear basis for the proposed approach and methodology to enable the timeous provision of infrastructure.

- Establish the basis for application of cumulative contribution zones.

- Clarify the provisions to which the policy applies and link these through to the potential requirements for transport and education within development areas and on specific sites.

- Address concerns that cumulative and cross boundary transport impacts are not appropriately covered in the context of this policy (see below).

- Amend the wording to demonstrate consistency with the relevant Circulars

- Accept the need to address issues of financial viability and to provide clarity regarding any approach to forward or gap funding.

- Clarify that whilst provision of community facilities and health care infrastructure is an important consideration a clear justification for seeking contributions remains to be established.

50. This approach relies on further clarity within the area based sections of the plan so that the potential infrastructure requirements, specifically those relating to cumulative impacts, are referenced in relation to the areas to which they apply. Many of these are only currently referenced in the action programme although some are drawn from tables 5 and 9 and from the matters raised in representation. To this end, drawing on my conclusions above and those in Issues 5, 19 and the area/site specific issues, my recommendations below include General Principles which have a direct bearing on the implementation of Policy Del 1. These general principles would be included within Part 1 Section 5 of the plan in order to provide guidance on the likely scope of infrastructure provision within the areas which are to become the focus of most future development- West Edinburgh, South East Edinburgh, South West Edinburgh and South Queensferry. They would also be referenced through a footnote to table 3 so it is clear they apply as relevant to existing sites.

51. Further submissions to the examination in response to the April 2016 further information requests question the application of a cumulative contributions approach given the recent ruling on the court case ruling *Elsick Development Co Limited v Aberdeen City and Shire Strategic Development Planning Authority*. However my understanding is that the court considered it unlawful to apply a roof tax approach where developments were expected to fund a package of measures not all of which are relevant to every development. I consider the revised wording of Del 1 and its associated text are sufficient to clarify that cumulative contributions in this instance are applied to enable the sharing of costs between developments which cumulatively require particular infrastructure investments.

Policy Del 2- Retrospective Contributions

52. On the matter of retrospective contributions the council's view is that there is no need to re-justify a principle already established through the Edinburgh City Local Plan. This approach has been applied since the first phase of the tram line was completed in 2014. However it does accept that some further justification of this approach should be added to paragraph 131 of the plan:

'This policy is in addition to, and in support of, Policy Del 1. It ensures that, where a completed section of the tram network will support a new development that development will contribute to the cost of constructing that section of the network. The same principle applies to other high cost infrastructure which has been delivered through borrowing. Planning permission for development on these sites will be granted subject to legal agreements securing contributions. High cost infrastructure may not always be fundable upfront solely by developer contributions. Forward and/or gap funding may be required. The council may decide to provide this and may need to borrow in order to do so. Relevant items may include those identified in the above table. The council's Action Programme and guidance provide details of the contribution amounts and the amount of money borrowed by the council against future contributions.'

53. I do not consider that a policy established in the current plan is outwith the remit of the examination. I find the policy wording, in so far as it includes reference to high costs and the repayment of borrowings, introduces matters which lack clarity and/or a firm basis in the terms of the Circular.

54. I understand the objective of the policy in so far as advanced funding of the required infrastructure would necessarily rely on borrowing based on future developer contributions. In addition to the Tram network the council's submissions also reference this as a means to achieve the forward funding of schools. However, I consider this to be a delivery and funding mechanism rather than a matter that needs to be specifically referenced in a separate policy.

55. My main concern is that Policy Del 2 as currently worded might be read to imply that contributions would continue to be sought to pay for the tram and other existing infrastructure irrespective of whether the proposal impacts on or creates a need for that infrastructure. It might also be considered to suggest that particular circumstances apply where the council has had to fund high cost infrastructure when in fact the issue remains whether the proposed development impacts on or creates a need for that infrastructure.

56. In these respects, I share the Scottish Government's concerns that there is no clarity about the types of developments that will be required to make retrospective developer contributions or the items for which such contributions will be sought.

57. I think this ambiguity could be removed and a clearer approach achieved if this matter was handled as part of a single overall developer contributions policy – as part of Del 1. This would clarify this is a mechanism for delivery of the necessary infrastructure rather than a separate policy approach or additional requirement. Given the established nature of the approach to Tram contributions I consider this could be specifically referenced but in the context of the policy as a whole, its supporting text and reference to Supplementary Guidance. This enables the approach to be established as part of Del 1 and avoids any potential conflict with the terms of the 2012 Circular. Consequently my recommendation is to remove Policy Del 2 and its supporting text, include a reference to

Trams in Policy Del 1 and include an explanation of potential funding mechanisms in the supporting text.

Other Matters

58. Issue 19 addresses the concerns raised by Transport Scotland and others that the plan does not fully address cumulative and cross boundary transport impacts. Given the recommended inclusion of a new Policy Trans X and our conclusions in this respect I consider that these matters need to be referenced in Policy Del 1 so that there is a mechanism to address any required mitigation.

59. The Supplementary Guidance to be produced in the context of Policy Del 1 provides the obvious vehicle through which to further detail this approach taking into account the emerging conclusions of the "Cumulative Impact Transport and Land Use Appraisal Working Group". This is addressed in my recommendations below although the justification for this approach relies mainly on the conclusions from Issue 19.

60. However, I recognise the uncertain timescale for conclusion of the study and I am concerned to avoid any consequent delay in approving Supplementary Guidance otherwise essential to the detail of Policy Del 1. To this end a footnote to the policy is recommended. This seeks to ensure timeous provision of the guidance (within one year) but accepts that this may only address an interim approach to wider cumulative/cross-boundary transport issues subject to refinement through a later submission or through the replacement development plan. In the meantime the approach set out above would clarify the parameters to address such matters through the master-planning or development management process. Consequently, I consider that with these changes the matters raised through this issue would be sufficiently addressed.

61. I deal with specific representations on rail infrastructure within the relevant site specific issue. For instance my conclusions on the proposed pedestrian bridge from the housing site at Maybury are included in Issue 7. I do not consider it necessary to include a specific policy statement on rail as this is covered sufficiently in general terms by Del 1 given that it would apply to all relevant transport infrastructure.

62. Policy Del 1 does make provision for contributions to Green space actions where required through Policy Hou 3 and for other local, major or national development if required by policies Env 18, 19 or 20. I consider this is sufficient to address the matters raised by the Scottish Wildlife Trust.

63. My recommendations include a new Appendix which clarifies that public realm improvements may be sought for Local, major & national developments (specific thresholds may be set in Supplementary Guidance) and City-wide, including in defined Contribution Zones and other locations where identified in the council's public realm strategy or as a site-specific action. Bearing in mind that such contributions may only be sought in the terms set out in the Circular this may be limited to required cycle and pedestrian linkages or specific amenity improvements associated with the proposals rather than to any wider enhancement of the city's public realm. However, I consider the terms of Policy Del 1, as recommended, are sufficient to comply with the Circular.

64. I have addressed specific matters relating to the delivery of the required education provision at Cammo through my conclusions on Issue 7. The council's Education appraisal identified the schools requirements for the area. My recommendation reference

these through the general development principles for West Edinburgh as set out below. The council's submissions indicate a 3 year lead in time in relation to education provision and a threshold of development by which the required new schools or extensions would be required. However I accept that there are remaining uncertainties and the council references the need for further assessment. With the necessary hooks in the plan I consider there is a clear remit for this further detail in Supplementary Guidance. I am satisfied that the revised terms of Del 1 are sufficient to comply with the Circular.

65. I consider that my recommendation to include General Development Principles for West Edinburgh and to require Supplementary Guidance to address the details of delivery of the required infrastructure is sufficient without the addition of a specific new delivery policy for West Edinburgh.

Reporter's recommendations:

1. Amend Paragraph 9, first sentence to read as follows :

The Council is preparing Supplementary Guidance in connection with:

- Policy Emp 2 Edinburgh BioQuarter
- Policy Ret 8, in relation to alternative uses in town centres
- Policies Del 1 in relation to developer contributions.

West Edinburgh

2. In Part 1 Section 5 of the Plan on page 50 delete all the text after the second sentence in paragraph 116 and add the following new paragraphs:

West Edinburgh: General Development Principles.

117. All proposals will be required to make appropriate contributions to the delivery of the infrastructure necessary to support the development strategy. The general development principles below outline the anticipated main transport and education actions for West Edinburgh.

118. The council's approach to infrastructure delivery is set out in Policy Del 1 and its associated Supplementary Guidance. Policy Tra X is also relevant in requiring cumulative and cross boundary transport impacts to be addressed. Development should only progress subject to sufficient infrastructure already being available or where it is demonstrated that it can be delivered at the appropriate time. Further assessment of individual and cumulative impacts may be required to further detail the required mitigation.

Transport Assessment

• Contributions to address the area wide transport interventions, detailed below and as specified through Supplementary Guidance, will be applied through a cumulative contribution zone. Delivery will be monitored and managed through the action programme. The council's approach to secure timeous delivery of the required infrastructure is to be detailed through its Supplementary Guidance.

• Detailed Transport Assessments, where required, should include modelling of the cumulative effect of increased traffic flows on the trunk and local road networks (taking into account all known proposed development and any potential cross-boundary impacts). This should draw on the conclusions of the council's transport appraisal and further work being carried out to assess the wider cumulative and cross-boundary impacts on the trunk road network and should show how mode share targets are to be met.

Education Appraisal

Contributions to the required education provision, as detailed below and as specified through Supplementary Guidance, will be applied where appropriate through a cumulative contribution zone drawing on the conclusions of the council's education appraisal. The council's approach to secure timeous delivery of the required schools capacity as outlined below is to be detailed through Supplementary Guidance. Delivery will be monitored and managed through the action programme.

119. The following sections indicate the main infrastructure requirements which were identified following initial assessment and should be considered in the context of Policy Del 1.

Scope of Transport mitigation subject to further assessment and the detail to be included in Supplementary Guidance(Del 1):

- Eastfield Road and Dumbells junction (T9)
- Gogar Link Road (T20)
- A8 additional junction (T11)
- Improvements to Newbridge Roundabout (T12)
- Bus Priority Measures on M8 and A89
- Improvements to Gogar Roundabout (T13)
- Maybury Junction (T17)
- Barnton Junction (T19)
- Craigs Road Junction (T18)

Scope of Education mitigation subject to further assessment and the detail to be included in Supplementary Guidance(Del 1):

- New Maybury (ND) primary school (SCH6)
- Extension to Gylemuir (ND) Primary School
- Extension to Hillwood (ND) Primary School
- Extension to Fox Covert (RC) Primary
- Extension at St Cuthbert's RC Primary School
- High School Extension (ND)- Further detailed assessment is necessary to determine where the additional capacity would be best provided; either at The Royal High School, Craigmount High School or Forrester High School or a combination across some, or all, of these schools and or
- Extension to St Augustines (RC) High School

South East Edinburgh

3. In Part one Section 5 of the Plan in the section on South East Edinburgh delete the

text in paragraph 117 after Principles for the Bioquarter and replace with the following new paragraphs:

South East Edinburgh General Development Principles

118. All proposals will be required to make appropriate contributions to the delivery of the infrastructure necessary to support the development strategy. The general development principles below outline the anticipated main transport and education actions for South-East Edinburgh.

119. The council's approach to infrastructure delivery is set out in Policy Del 1 and its associated Supplementary Guidance. Policy Tra X is also relevant in requiring cumulative and cross boundary transport impacts to be addressed. Development should only progress subject to sufficient infrastructure already being available or where it is demonstrated that it can be delivered at the appropriate time. Further assessment of individual and cumulative impacts may be required to further detail the required mitigation.

Transport Assessment

• Contributions to address the area wide transport interventions, detailed below and as specified through Supplementary Guidance, will be applied through a cumulative contribution zone. Delivery will be monitored and managed through the action programme. The council's approach to secure timeous delivery of the required infrastructure is to be detailed through its Supplementary Guidance.

• Detailed Transport Assessments, where required, should include modelling of the cumulative effect of increased traffic flows on the trunk and local road networks (taking into account all known proposed development and any potential cross-boundary impacts). This should draw on the conclusions of the council's transport appraisal and further work being carried out to assess the wider cumulative and cross-boundary impacts on the trunk road network and should show how mode share targets are to be met.

Education Appraisal

Contributions to the required education provision, as set out below and as detailed through Supplementary Guidance, will be applied where appropriate through a cumulative contribution zone drawing on the conclusions of the council's education appraisal. The council's approach to secure timeous delivery of the required schools capacity is to be detailed through Supplementary Guidance. Delivery will be monitored and managed through the action programme.

120. The following sections indicate the anticipated infrastructure requirements which as identified following initial assessment:

South East Edinburgh(South)

Scope of Transport mitigation subject to further assessment and the detail to be included in Supplementary Guidance(Del 1):

- Straiton junction on the A720

- T14 Sheriffhall Junction
- Gimerton junction (A720)
- Burdiehouse junction (proposal T21)
- Gilmerton Crossroads (T20) junction capacity upgrade
- Access and parking strategy for Drum Street
- Improved capacity and other enhancements to bus services.

Scope of Education mitigation subject to further assessment and the detail to be included in Supplementary Guidance(Del 1):

• A new Gilmerton primary school (SCH7) and new Broomhill primary school (SCH8) And/or
• Extension to Gilmerton (ND) primary school, Gracemount (ND) primary school and Liberton and Craigour Park if required due to catchment changes
• Extension to St John's Vianney (RC) Primary School and St Catherine's (RC) Primary School
And
• Extension to South East Edinburgh High Schools- subject to further detailed assessment as to whether the additional capacity would be best provided; either at Liberton High School or Gracemount High School.

South East Edinburgh (North)

Scope of Transport mitigation subject to further assessment and the detail to be included in Supplementary Guidance(Del 1):

- Sheriffhall roundabout (T14)
- West of Fort Kinnaird Road to the Wisp (T16)
- Gilberstoun link (T8)
- Old Craighall Junction

Scope of Education mitigation subject to further assessment and the detail to be included in Supplementary Guidance(Del 1):

- Option 1 - New Brunstane Primary School (SCH 9)
- Option 2 – As option 1, but additional extension to Newcraighall Primary School
- New Greendykes Primary School (SCH 3)
- Extension to Castlebrae High School or Replacement Castlebrae High School (SCH 2)

Elsewhere across the LDP Area

4. In Part 1 Section 5 of the Plan on page 69 add the following new paragraphs after paragraph 122:

South West Edinburgh and South Queensferry General Development Principles

123. All proposals will be required to make appropriate contributions to the delivery of the infrastructure necessary to support the development strategy. The general development principles below outline the anticipated main transport and education actions for South West Edinburgh and South Queensferry.

124. The council's approach to infrastructure delivery is set out in Policy Del 1 and its associated Supplementary Guidance. Policy Tra X is also relevant in requiring cumulative and cross boundary transport impacts to be addressed. Development should only progress subject to sufficient infrastructure already being available or where it is demonstrated that it can be delivered at the appropriate time. Further assessment of individual and cumulative impacts may be required to further detail the required mitigation.

Transport Assessment

• Contributions to address the area wide transport interventions, detailed below and as specified through Supplementary Guidance, will be applied through a cumulative contribution zone. Delivery will be monitored and managed through the action programme. The council's approach to secure timeous delivery of the required infrastructure is to be detailed through its Supplementary Guidance.

• Detailed Transport Assessments, where required, should include modelling of the cumulative effect of increased traffic flows on the trunk and local road networks (taking into account all known proposed development and any potential cross-boundary impacts). This should draw on the conclusions of the council's transport appraisal and further work being carried out to assess the wider cumulative and cross-boundary impacts on the trunk road network and should show how mode share targets are to be met.

Education Appraisal

Contributions to the required education provision, as set out below and as detailed through Supplementary Guidance, will be applied where appropriate through a cumulative contribution zone drawing on the conclusions of the council's education appraisal. The council's approach to secure timeous delivery of the required schools capacity is to be detailed through Supplementary Guidance. Delivery will be monitored and managed through the action programme.

125. The following sections indicate the anticipated infrastructure requirements which as identified following initial assessment:

South West Edinburgh

Scope of Transport mitigation subject to further assessment and the detail to be included in Supplementary Guidance(Del 1):

- Gillespie Crossroads
- Hermiston Park & Ride

Scope of Education mitigation subject to further assessment and the detail to be included in Supplementary Guidance(Del 1):

- Extension to Currie (ND) Primary School (SCH10).

South Queensferry

Scope of Transport mitigation subject to further assessment and the detail to be

included in Supplementary Guidance(Del 1):

- The Queensferry and Scotstoun junctions on the A90
- Bus and rail service improvements (routes and frequency) which can be undertaken in the plan period.
- Provision of additional parking facilities for cars and cycles at Dalmeny Station

Scope of Education mitigation subject to further assessment and the detail to be included in Supplementary Guidance(Del 1):

- New Builyeon Road (ND) Primary School (SCH 10)
- Extension to Queensferry (ND) High School
- Extension to St Margaret's (RC) Primary School
- Extension to St Augustines (RC) High School

Existing sites in table 3

5. Add footnote to table 3 to read: Depending on the current planning status of the site proposals should address the required delivery of infrastructure in accordance with the relevant General Development Principles in part 1 section 5 of the plan and with Policies Tra X and Del 1.

6. Replace paragraphs 100-101 as follows:

100. The timeous delivery of this infrastructure to address the individual and cumulative impacts of development is an important consideration. Policy Del 1 sets out a policy requirement to ensure that appropriate developer contributions are sought to enable this delivery at the appropriate time. Part of this approach will include the establishment of cumulative contribution zones.

101. In these zones contributions will be sought to address the impact of a number of sites within areas defined relative to schools, transport infrastructure, public realm and green space requirements. These will be based on the transport and education appraisals and the Open Space Strategy carried out by the Council during the plan preparation process. The relative zones will be mapped and defined through Supplementary Guidance. The geographical extent of a contribution zones relates to the type and nature of the action in relation to transport, education, public realm and green space.

102. Developer contributions must be proportionate and attributable to the impacts of the development. They also have to be realistic in light of current economic circumstances otherwise they may impede development. This is particularly important given the emphasis placed on securing the required uplift in housing completions. In this context mechanisms for forward and gap funding may also have to be considered.

103. To address the detail of these matters within the development plan statutory Supplementary Guidance is to be prepared. This should enable a clear understanding of what is required at the outset, provide the required basis for the council's approach to developer contributions, define cumulative contribution zones in map form and address community concerns about the timeous provision of the

required infrastructure. This should set a clear foundation for future action programmes which will be updated annually to provide a framework for the implementation of the specific actions required to ensure delivery.

7. Replace Policy Del 1 as follows :

Del 1 Developer Contributions and Infrastructure Delivery

1. Proposals will be required to contribute to the following infrastructure provision where relevant and necessary to mitigate* any negative additional impact (either on an individual or cumulative basis) and where commensurate to the scale of the proposed development:

- The strategic infrastructure from SESplan Fig2, the transport proposals and safeguards from table 9 including the existing and proposed tram network, other transport interventions as specified in Part 1 Section 5 of the Plan and to accord with Policy TRAX. Contribution zones will apply to address cumulative impacts.

- Education provision including the new school proposals from Table 5 and the potential school extensions as indicated in Part 1 Section 5 of the Plan. Contribution zones will apply to address cumulative impact.

- Green space actions if required by Policy Hou 3, Env 18,19 or 20. Contribution zones may be established where provision is relevant to more than one site.

- Public realm and other pedestrian and cycle actions where identified in the Council's public realm strategy, or as a site specific action. Contribution zones may be established where provision is relevant to more than one site.

2. Development should only progress subject to sufficient infrastructure already being available or where it is demonstrated that it can be delivered at the appropriate time.

In order to provide further detail on the approach to implementation of this policy and to provide the basis for future action programmes Supplementary Guidance** will be prepared to provide guidance including on:

- The required infrastructure in relation to specific sites and/or areas
- Approach to the timely delivery of the required infrastructure
- Assessment of developer contributions and arrangements for the efficient conclusion of legal agreements
- The thresholds that may apply
- Mapping of the cumulative contribution zones relative to specific transport, education, public realm and green space actions.
- The council's approach should the required contributions raise demonstrable commercial viability constraints and/or where forward or gap funding may be required.

* Further assessments may be required to detail the required mitigation

** This guidance should be submitted to Ministers within one year from the date of

adoption of this plan. In the event that timing of the findings of the Cumulative Impact Transport and Land Use Appraisal Working Group would delay inclusion of details on cross boundary issues an interim approach will be detailed through the Supplementary Guidance to be confirmed through the replacement development plan.

8. Rename the section on Action Programme Contributions as Developer Contributions, amend paragraphs 127-130 as follows and delete the separate heading of "Other Contributions"

127. Anticipated transport and schools requirements relative to specific areas (General Development Principles) and sites (Development Principles) are set out in Part 1 section 5 of the plan. Appendix Y details the provisions for which contributions would be sought. These include:

- School capacity increases including new schools

- Traffic management and other transport improvements to address the individual and cumulative impact of proposed development including on the Trunk Road Network.

- Green Space Actions

128. The council has already forward funded the completed section of the tram network and contributions will continue to be sought from future development which impacts on or creates a need for this infrastructure. This approach to developer contributions may apply to other items of required infrastructure such as schools where advance provision is necessary to enable the development strategy.

129. Further detail of anticipated requirements and the approach to delivery including the use of cumulative contributions zones, a framework for consideration of financial viability issues and possible approaches to forward and gap funding will be set out through the Supplementary Guidance as referenced in Policy Del 1.

130. An action programme will then be rolled forward annually to monitor timescales and identify the need for further action and the parties responsible.

131. The council recognises that the scale of proposed development may also impact on other infrastructure including health and community facilities. Policy Hou 10 is relevant in this respect. However there is a current lack of information on the scale of such requirements and how they should be addressed. Whilst it may be appropriate to seek contributions for such provision any requirement would need to be considered on a case by case basis where a clear justification can be provided in the context of Circular 3/2012. The feasibility of including such additional contributions and the impact on development viability would also have to be assessed.

9. Delete Policy Del 2 and supporting text in paragraph 131.

10. Add an additional table, Appendix Y, as follows:

Appendix Y Infrastructure Items for which financial or other contributions may be

sought

ITEM	CIRCUMSTANCES • **Types of Development** • **Location**
School capacity, including new schools	• Housing developments • City-wide, including in defined Contribution Zones and other locations required by policies Del 1.
Traffic management, including junction improvements	• Local, major & national developments (specific thresholds may be set in Supplementary Guidance) • City-wide, including in defined Contribution Zones and other locations required by policy Del 1.
Edinburgh Tram Project	• Local, major & national developments (specific thresholds may be set in Supplementary Guidance) • In defined Contribution Zones
Public realm – including pedestrian and cycle actions	• Local, major & national developments (specific thresholds may be set in Supplementary Guidance) • City-wide, including in defined Contribution Zones and other locations required by policy Del 1 or where identified in council's public realm strategy – or as site-specific action.
Other transport improvements	• Local, major & national developments (specific thresholds may be set in Supplementary Guidance) • City-wide, including in defined Contribution Zones and other locations required by policy Del 1.
Green space actions	• Housing developments if required by Policy Hou 3. Other local, major or national development if required by policies Env 18, 19 or 20 • City-wide, including in defined Contribution Zones

Issue 22	**Design and Environment Policies**	
Development plan reference:	**Part 2 Section 2 pages 80 – 85** **Part 2 Section 3 pages 86 – 93**	**Reporter:** Richard Bowden

Body or person(s) submitting a representation raising the issue (including reference number):

0083 Martin White
0113 Forestry Commission Scotland
0124 sportscotland
0165 Ken Shade
0170 Balerno Community Council
0244 Tony Gray
0305 Colinton Amenity Association
0432 Greener Leith
1048 Swanston Farms Ltd
1023 Edinburgh Airport
1170 A J C Clark
1660 Adrian Graham
1964 Grange Association
2085 A & D Brewster
2086 Persimmon Homes (East Scotland)
2088 Scottish Government
2119 Colinton Country Cattery
2126 Cockburn Association
2276 Gladman Developments Ltd
2279 Hallam Land Management Ltd
2281 Wallace Land Investment and Management
2299 Forbes Marr
2354 Grange/Prestonfield Community Council
2463 Euan Leitch
2480 Rosebery Estates Partnership
2505 Scottish Wildlife Trust
2567 Community Land Advisory Service
2687 Leith Central Community Council
2690 West End Community Council
2699 Scottish Environment Protection Agency
2702 Scottish Canals

Provision of the development plan to which the issue relates:	These policies set out criteria to be considered in the design of new development and protection of the historic and natural environment.

Planning authority's summary of the representation(s):

CONTEXT

The Main Issues Report in paragraphs 1.1-1.3 explained the Council's approach to reviewing policies from the two adopted local plans. The LDP is generally based on the policy wording of the Edinburgh City Local Plan, as it is more recently prepared than the Rural West Edinburgh Local Plan.

Chapter 9 of the Main Issues Report stated that the current design policy wording complied with national policy and good practice. However, Section 2.3.5 of the Monitoring Statement found that the design policies were not working as well as intended in terms of the quality of new development approved. The Main Issues Report therefore proposed to clarify the interpretation of the design related policies through restructuring and by consolidating the Council's non-statutory design guidance. The Edinburgh Design Guidance provides clear interpretation of each of the design policies.

Section 3 of the Monitoring Statement demonstrated that most of the existing environment policies were broadly meeting their objectives and didn't need to change. This was stated in paragraph 7.2 of the Main Issues Report.

DESIGN POLICIES

General

- Although welcome the need for good design, the specifics should be applied on a site by site basis, and this needs to be included within the wording of the design policies. This is particularly the case for sites which are significantly outwith conservation areas, or within areas of poor architectural merit. **(2086 Persimmon Homes (East Scotland))**
- Amend certain policies, including Des 1, Des 3 and Des 5, to remove the requirement to 'demonstrate' the creation/contribution towards a sense of place, that existing characteristics and features worthy of retention have been identified and that the development proposals are acceptable in general amenity terms. Amend also the wording of policies Des 4 and Des 9 to provide more flexibility in relation to design requirements. **(2276 Gladman Developments Ltd)**

Policy Des 3

- Recommend that the word 'potential' in the name of Policy Des 3 is replaced with the word 'recognised'. Also recommend that the 'existing characteristics and features worthy of retention...' should be modified to 'existing characteristics and recognised features, as identified by the Council, statutory consultees or by the applicant through the design process...' **(2279 Hallam Land Management Ltd)**
- Amend the wording of Policy Des 3 on the basis that it does not accord with the Planning Act as it seeks to impose obligations on matters in the surrounding area which are considered as not being required to secure planning permission. An applicant for planning permission can only implement requirements on land under their control. The policy as currently worded does not comply with the requirements of Circular 4/1998 Planning Conditions and Circular 3/2012 Planning Obligations and Good Neighbour Agreements. **(2281 Wallace Land Investment and Management)**
- Support Policy Des 3, particularly reference to trees and woodland, biodiversity, habitat and green network and providing new habitat to further the conservation of biodiversity. The policy acts on the Council's biodiversity duty and accords with the Edinburgh Living Landscape. **(2505 Scottish Wildlife Trust)**

Policy Des 4

- Object to the inclusion of 'impact on existing views' within Policy Des 4 as a loss of view is not considered to be a material planning consideration. Alternatively, change the word 'existing' to 'key' and make reference in the supporting text to the Planning Guideline to be absolutely clear about what is and what is not being protected here. **(2480 Roseberry Estates Partnership)**
- Amend wording of last line of paragraph 140 to Policy Des 4 by adding in local and distant views of built structures such as the castle, bridge, monuments, memorials, with the awareness that there is no buffer zone to assist the protection of the World Heritage Site. **(2690 West End Community Council)**

Policy Des 5

- Amend the wording of Policy Des 5a) on the basis that the Oxford Dictionary

defines 'outlook' as comprising 'a view' and a loss of a view is not a material consideration and on this basis, should be removed from Policy Des 5a). Considers that it is not always achievable to avoid single access residential layouts and cul-de-sacs. **(2480 Roseberry Estates Partnership)**
- Reference to Edinburgh Design Guidance is needed for Policy Des 5 to help implementation. **(2126 Cockburn Association)**

Policy Des 6

- Suggests additional wording for Policy Des 6 which recognises the expense of retro-fitting district heating infrastructure and considers that district heating infrastructure may not be necessary if a major development can comply with passivhaus standards throughout. **(0432 Greener Leith; 2687 Leith Central Community Council; 1660 Adrian Graham)**
- Amend the wording of Policy Des 6a) – 'low or zero carbon technology' should be reworded to 'low and zero-carbon generating technologies'. **(2088 Scottish Government)**
- Amend the wording of Policy Des 6 to make reference to Approval of Matters Specified in Conditions and Planning Permission in Principle, as well as a requirement to demonstrate satisfactory compliance with the requirements set out in Scottish Planning Policy and national and other guidance on sustainable development. The reason for the suggested modification is that it is not considered appropriate for all planning applications to demonstrate detailed compliance. **(2281 Wallace Land Investment and Management)**
- Amend the final paragraph of the supporting text to Policy Des 6 to reflect the position with regards to combined systems. Scottish Water only accepts water into a combined system in exceptional circumstance. Removing surface water from the combined sewer in favour of SUDS increases capacity in infrastructure for future developments and reduces the risk of pollution events. There is an expectation that any developer should ensure that all reasonable efforts are made to remove surface water from the combined sewer from the outset. **(2699 Scottish Environment Protection Agency)**
- Suggests that words are needed in Policy Des 6 to highlight that SUDs need to be designed to ensure the safety of adjoining residents and visitors. **(2126 Cockburn Association)**
- Support Policy Des 6 which is aligned to the principles of sustainable development. **(2505 Scottish Wildlife Trust)**

Policy Des 8

- Amend Policy Des 8 by adding in a new criterion, which ensures that there is no risk to aerodrome. Circular 2/2003 states that local plans should indicate established safeguarding areas. The inclusion of an additional criteria and adding the circumference of the safeguarding consultation zone to the proposals map, developers will have clarity on when they need to address aerodrome safeguarding. **(1023 Edinburgh Airport)**
- Amend Policy Des 8 to include a new criterion which refers to sustainable food production. It is considered that there should be a presumption in favour of structure associated with urban growing. **(2567 Community Land Advisory Service)**
- Support Policy Des 8 which is aligned to the principles of sustainable development.

(2505 Scottish Wildlife Trust)

Policy Des 9

- Amend the wording of Policy Des 9 by adding in criterion d) which sets out the circumstances within which sites on the urban edge should be approved if a 5 year effective land supply is not being maintained at all times as required by Scottish Planning Policy. Considers that the requirements set out by Scottish Ministers in Scottish Planning Policy have not been fully taken into account and consequently the development strategy will fail to maintain a five year effective housing land supply at all times from the adoption of the Plan. **(2281 Wallace Land Investment and Management)**
- Objects on the grounds that Policy Des 9 is being applied in a restrictive manner. Requests for greater flexibility in Policy Des 9 Urban Edge Development to include land within private garden curtilage at the Water of Leith. **(0083 Martin White)**
- Considers that the very large tree belt provision of 50m required across a number of sites in the site briefs does not allow for future proofing to meet future housing needs. Specifically refers to Policy Des 9 which is considered to not comply with Scottish Planning Policy on sustainable development as it does not provide the opportunity for good connectivity to additional development to take place in the future. Requests that the requirement for a developer to deliver significant boundary treatment within the site briefs is removed. **(2086 Persimmon Homes (East Scotland)**

Policy Des 10

- Considers that there is an opportunity to reinforce Policy Des 10 or create a Canal Policy which supports the on-going regeneration of the Union Canal. **(2702 Scottish Canals)**
- Amend Policy Des 10 c) to ensure that any development coming forward has due regard to the Water Framework Directive objectives of protecting and improving the water environment. Considers that this approach will facilitate positive improvements in the water environment while ensuring that any adverse impacts are adequately avoided. **(2699 Scottish Environment Protection Agency)**

Policy Des 11

- Considers that Policy Des 11 is aimed at protecting the identified and mapped Key Views contained in the Planning Guideline 'Protection of Key views' and this should be referenced in the amended text. Amend criteria c) of Policy Des 11 to make reference to the protection of identified and mapped Key Views instead of using the words 'important views'. **(2480 Roseberry Estates Partnership)**

Policy Des 12

- Amend wording of Policy Des 12b) to refer to the Edinburgh Design Guidance due to concerns about the wording 'no unreasonable loss of privacy'. **(2126 Cockburn Association)**

ENVIRONMENT POLICIES

General

- Considers that the Plan fails to provide explicit support for additional tourist/visitor camping facilities to augment this key sector of economic activity, and income for the city. Refers to Policy E24 of the Rural West Edinburgh Local Plan, which provides support for new touring caravan sites within the Green Belt and Countryside Area to support tourism. Recognises that paragraph 56 of the Plan sees the increase in tourist bed spaces as a priority, the Plan fails to provide any support or locational criteria for the establishment of additional touring and holiday home sites. **(2299 Forbes Marr)**
- Consider that policies Env 8, Env 9 and Env 12 have not worked in practice and need to, therefore, be more flexible. By placing Tree Preservation Orders, it is making it difficult for owners and neighbours to manage the trees, which is causing damage to the buildings. **(0165 Ken Shade; 0170 Balerno Community Council)**
- Considers that the interiors of listed buildings need adequate protection from damaging internal alterations. **(2690 West End Community Council)**

Policy Env 1

- Requests that the name of Policy Env 1 be changed to 'World Heritage Site' to reflect the Forth Bridge potentially becoming a World Heritage Site. **(2463 Euan Leitch)**
- It would be helpful to explain 'outstanding universal value' in the Glossary. **(2126 Cockburn Association)**

Policy Env 2

- Amend the wording of Policy Env 2, by adding in a new criterion, which states 'The general presumption will be to retain buildings that make a positive contribution to their location. In this regard, where there is a conflict between retention or demolition, especially in the case of Category A and B listed buildings, greater weight should be given to retention in the decision making process'. Considers that the decision to retain or demolish a listed building is finely balanced, requiring difficult assessments of qualitative values in cost/benefit appraisals. **(2126 Cockburn Association)**

Policy Env 3

- Consider that Policy Env 3 should be made more positive by removing the words 'not detrimental to' and substituting 'it would enhance'. **(1964 Grange Association)**

Policy Env 4

- Amend the wording of Policy Env 4 to accord with the Scottish Historic Environment Policy. **(2463 Euan Leitch)**
- Suggest the removal of 'unnecessary' in criteria b) of Policy Env 4 and change 'diminish' to 'diminution of'. **(1964 Grange Association)**

Policy Env 5

- Suggest that the wording of Policy Env 5 should be changed to avoid confusion for applications. **(2463 Euan Leitch)**
- Amend the wording of Policy Env 5 to make it clearer and less open to misunderstanding. **(1964 Grange Association)**

Policy Env 6

- Amend the wording of Policy Env 6 b) by adding in 'shrubs' after 'trees'. Add in a new sentence to the last line of paragraph 160 which states that 'the above policies should also apply during maintenance operations, especially in the proposed felling of established trees without Tree Protection Orders, which will require Council consent.' Amend line 1 paragraph 161 of Policy Env 6 by deleting 'erode' and inserting 'damage'. **(2126 Cockburn Association)**
- Paragraph 161 of Policy Env 6 states 'Conservation Area Consent may be subject to conditions or a legal agreement to link demolition works to the provision of the proposed replacement building or...' Replace 'may be' with 'should normally be' in Policy Env 6. Considers that demolition of a building in a conservation area leaving an empty building site would be detrimental to the special character of the area. **(1964 Grange Association)**

Policy Env 7

- Amend the wording of the policy by inserting 'and its setting as...' after 'site' to add clarity. **(2126 Cockburn Association)**

Policy Env 10

- Amend the first paragraph of Policy Env 10 to make it clear that development proposals should not detract from the purpose of the green belt (and by association in the proposed plan, the countryside) in protecting and giving access to open space. **(0124 sportscotland)**
- Suggests including paragraph 9 of the Capital Coalition Motion, which refers to brownfield land before Greenfield land, as an additional policy under Natural Environment or in Policy Env 10 to ensure a commitment to prioritising new building on brownfield sites before releasing greenbelt land. **(0244 Tony Gray)**
- Reluctantly accepts the loss of some green belt to development as a consequence of the scale of the LDP targeted housing allocation. Protection through the LDP should be further emphasised. Amending paragraph 122 by omitting the word 'major' seeks to protect the green belt from any inappropriate development and not just major development. Amend Policy Env 10 by re-stating the principle expressed in paragraph 122 that development in the green belt and countryside 'will only be permitted in exceptional circumstances'. **(0305 Colinton Amenity Association)**
- Requests that Policy Env 10 makes reference to diversification of the rural economy in line with national policy, for example an additional criteria to allow certain types and scales of development in line with SPP. In addition to recreational use being possibly acceptable reference is made to 'essential infrastructure such as electronic communications and electricity grid connections' and 'horticulture, including market gardening and directly connected retailing'.

These references should be specified as criteria within Env 10. **(1048 Swanston Farms Ltd)**

- Concerned about the continued erosion of Edinburgh's green belt. More protection is needed in Policy Env 10. Add a new first policy paragraph 'within the green belt, except in exceptional circumstances, there will be a presumption against development in areas with a landscape character score of 70 or above, as derived from the Edinburgh Green Belt Strategy 2008 Stage 1'. Also in the last line after 'use' add 'and the rural setting' into criteria a) of Policy Env 10 to add clarity. **(2126 Cockburn Association)**
- Amend Policy Env 10 to reflect the instances where a building has no use and is required to be redeveloped or replaced. Considers that reference to the 'Development in the Countryside and Green Belt' guidance should be removed as Policy Env 10 appears to take a more relaxed approach to a wider range of uses. **(2480 Rosebery Estates Partnership)**
- If the site previously identified as Craigpark Quarry in the Rural West Edinburgh Local Plan is not removed from the Countryside Area Policy (Issue 17), it is requested that the wording of policy Env 10 is amended to reflect SPP which is specific about what types of uses are appropriate in the countryside or green belt. **(2544 Tartan Leisure Ltd)**

Policy Env 10 – Housing Land Supply

- Considers that the LDP fails to address fully the rural development policy expounded in SPP. Amend Policy Env 10 to confirm that, as required by the latest SPP 'the housing land supply can be met from a number of sources' and include a provision to accommodate demands of small scale housing development. Suggests land associated with the Cattery Business which could contribute to housing land supply. **(2119 Colinton Country Cattery)**
- Amend Policy Env 10 and paragraph 167-169 to include a direct reference to SESplan Policy 7. Requests that an additional criterion should be added to Policy Env 10 which provides the necessary development plan policy context to secure the release of land from the Green Belt in accordance with the approved Strategic Development Plan. **(2279 Hallam Land Management Ltd)** Suggests an additional criterion to Policy Env 10 which refers to the 5 year effective housing land supply. **(2281 Wallace Land Investment and Management)**

Policy Env 11 and 17

- Amend wording of both Policy Env 11 and Env 17 to reflect the role of SLAs in protecting and promoting outdoor recreation according to Scottish Natural Heritage and Historic Scotland advice. It is also stated that the term Special Landscape Areas is contrary to the policy intent of Scottish Planning Policy which recommends the use of Local Landscape Areas. **(0124 sportscotland)**
- Delete Policy Env 11 and replace with the wording of Policy Env 11 in the first Proposed Plan. Considers that the current wording provides a very weak protection for an important landscape asset. **(2126 Cockburn Association)**

Policy Env 12

- Requests that reference to the Scottish Government's Policy on Control of Woodland Removal and UK Forest Standard, is added to paragraph 172 of Policy

Env 12. These two documents are key for all practitioners and authorities involved in the decision making process for tree and woodland management. **(0113 Forestry Commission Scotland)**

- Insert 'sizes' after 'species in line 4 of Policy Env 12. Where appropriate, large sizes of trees can provide rapid offset to loss of amenity. **(2126 Cockburn Association)**
- It is not clear whether Policy Env 12 is intended to protect woodlands. Paragraph 201 of SPP states that Plans should identify woodlands of high nature conservation value and include policies for protecting them. Recognise that paragraph 172 of the Plan make reference to Ancient Woodland and Millennium Woodland, but the protection of woodland needs to be clearer in the policy itself. Amend Policy Env 12 by adding in the words 'or woodland' after 'other tree'. If the Council consider that woodlands may be protected by Policy Env 15, then it would be useful to include a cross reference in the text. **(2088 Scottish Government)**

Policy Env 13

- The third bullet pointed criterion from paragraph 208 of the Scottish Planning Policy should be added to Policy Env 13 as sub clause b iii. Paragraph 208 of SPP states that a derogation is available to approve plans or projects if, in addition to the criteria outlined in Policy Env 13b i) and ii), compensatory measures are provided to ensure that the overall coherence of the Natura network is protected. **(2088 Scottish Government)**

Policy Env 15

- Consider that criteria a) and b) of Policy Env 15 should be strengthened to ensure a strong presumption against development on local biodiversity sites. Where development is permitted, it is important to see a net gain in biodiversity to compensate for that which has been lost both spatially and temporally to development. In those exceptional circumstances where development is allowed, there must be a transparent process to demonstrate that the reasons given for allowing the development are sufficient to outweigh the nature conservation interest of the site. **(2505 Scottish Wildlife Trust)**
- Amend criteria a) of Policy Env 15 by inserting 'significantly' after 'outweigh'. **(2126 Cockburn Association)**

Policy Env 18

- Amend criteria d) of Policy Env 18 by inserting 'important' after 'will be an'. Amend criteria e) of Policy Env 18 by inserting 'significantly' after 'community'. **(2126 Cockburn Association)**

Policy Env 19

- Amend the title and wording of Policy Env 19 to reflect the policy protection applying to outdoor sports facilities in line with the requirements of Scottish Planning Policy. **(0124 sportscotland)** Similarly, the Scottish Government expects the full range of outdoor sports facilities as defined in Scottish Planning Policy's Glossary to be protected. They suggest amending the wording of Policy Env 19, including renaming the policy to 'Outdoor Sports Facilities Protection' and

substitute references to 'playing fields' throughout the policy with this wording. Change criteria d) to bring it in line with the 4th bullet in Scottish Planning Policy paragraph 226. **(2088 Scottish Government)**

Policy Env 21

- Paragraph 183 of Policy Env 21 states that development within Areas of Importance for Flood Management will be acceptable if adequate compensating measures can be carried out. The use of the term 'adequate' is ambiguous and there are concerns that it could result in mitigation that does not result in a neutral or better outcome in relation to flood storage capacity. Scottish Planning Policy paragraph 263 states that any loss of flood storage capacity is mitigated to achieve a neutral or better outcome. Amend the wording of paragraph 183 of Policy Env 21 to better reflect Scottish Planning Policy. **(2088 Scottish Government)**
- Amend paragraph 183 of Policy Env 21 because the sentence, as currently written, appears to encourage or support the management or mitigation of flood risk contrary to the requirements of the Flood Risk Management Act which seeks the avoidance of flood risk in the first instance. **(2699 Scottish Environment Protection Agency)**
- The cornerstone of sustainable flood management is the avoidance of flood risk in the first instance. The Flood Risk Management (Scotland) Act (2009) prescribes a new responsibility for local authorities to exercise their flood risk related functions with a view to reducing overall flood risk. Request that additional information is included in the supporting text for Policy Env 21 to reflect clearly responsibilities under the Act. **(2699 Scottish Environment Protection Agency)**
- Request that criterion a) of Policy Env 21 is amended to be consistent with Scottish Planning Policy paragraph 256. It is considered essential that proposals do not result in an increase in vulnerability to flood risk. In applying this policy, it is requested that CEC use SEPA's Land Use Vulnerability Guidance to support the implementation of the policy. **(2699 Scottish Environment Protection Agency)**
- Amend the wording of paragraph 185 of Policy Env 21 because the current wording suggests that SUDS can be used to avoid or manage pluvial flood risk, which is contrary to the requirement of the Flood Risk Management Act to reduce flood risk in the first instance. The emphasis should be on building in areas which are not at risk of flooding or increasing the risk of flooding elsewhere. **(2699 Scottish Environment Protection Agency)**
- The comments made on page 14 paragraph 43 of the Plan should be incorporated into this policy for the reasons outlined in Issue 3. **(2126 Cockburn Association)**

Policy Env 22

- Request an amendment to the wording of Policy Env 22 criteria b) and criteria d) to reflect more fully and accurately the aims of the Water Framework Directive (2000/60/EC) which are twofold – to protect and enhance the quality of the water environment and not just protect and enhance the water quality. **(2699 Scottish Environment Protection Agency)**
- Delete 'no significant' from criteria a) and b) of Policy Env 22, and insert 'minimal'. **(2126 Cockburn Association)**
- Amend Policy Env 22 to make specific reference to public safety and ground stability. This is necessary to ensure that developers appropriately consider ground conditions and land stability issues arising from the legacy of past coal

mining activity in Edinburgh. **(02723 The Coal Authority)**

Modifications sought by those submitting representations:

DESIGN POLICIES

General

- No specific modifications requested. State that design specifics should be applied on a site by site basis, and this needs to be included within the wording of the design policies. **(2086 Persimmon Homes (East Scotland))**
- Amend policies Des 1, Des 3 and Des 5 to remove the requirement to 'demonstrate' the creation/contribution towards a sense of place, that existing characteristics and features worthy of retention have been identified and that the development proposals are acceptable in general amenity terms. Amend also the wording of Policy Des 4 to state that 'planning permission will be granted for development where it is demonstrated that it is appropriate for its surroundings...' Amend also the wording of Policy Des 9 to include 'if appropriate' and a fourth criteria which makes reference to sites which contribute towards the delivery of strategic housing requirements. **(2276 Gladman Developments Ltd)**

Policy Des 3

- It is considered that the wording of the Policy Des 3 is too vague and subjective and should be improved for clarity. Replace the word 'potential' in the name of Policy Des 3 with the word 'recognised'. Also 'existing characteristics and features worthy of retention...' should be modified to 'existing characteristics and recognised features, as identified by the Council, statutory consultees or by the applicant through the design process...' **(2279 Hallam Land Management Ltd)**
- Amend wording of Policy Des 3 by removing the words 'and in the surrounding area'. **(2281 Wallace Land Investment and Management)**

Policy Des 4

- Remove the words 'and impact on existing views', or change the word 'existing' to 'key' and make reference in the supporting text to the Planning Guideline to be absolutely clear about what it is, and what is not being protected here. **(2480 Rosebery Estates Partnership)**
- Amend wording of last paragraph of 140 of Policy Des 4 by adding in local and distant views of built structures such as the castle, bridge, monuments, memorials, with the awareness that there is no buffer zone to assist the protection of the World Heritage Site. **(2690 West End Community Council)**

Policy Des 5

- Remove the words 'immediate outlook' from Policy Des 5a). The supporting text should be amended to include, in the penultimate sentence, the words 'where possible' after 'avoided' and before 'to help'. **(2480 Rosebery Estates Partnership)**
- Reference to Edinburgh Design Guidance is needed for Policy Des 5a) and b) to help implementation and clarification, as it is considered to be a sensitive issue for

neighbouring properties. **(2126 Cockburn Association)**

Policy Des 6

- Suggests inserting additional text into Policy Des 6 – 'As retro-fitting district heating infrastructure is so expensive, all major new developments should include district heating infrastructure and incorporate space to support low-carbon combined heat and power facilities. Ideally, these should be scaled to supply the development and any nearby heat customers that can easily be connected'. **(0432 Greener Leith; 2687 Leith Central Community Council; 1660 Adrian Graham)**
- Amend the wording of Policy Des 6a) with regards to 'low or zero carbon technology'. **(2088 Scottish Government)**
- Amend the wording of Policy Des 6 by adding in 'Applications for...' at the start of the policy and after 'Planning Permission' add in 'and Approval of Matters Specified in Conditions'. Suggests also that supporting text would read 'Applications for Planning Permission in Principle will be required to demonstrate satisfactory compliance with the requirements set out in Scottish Planning Policy and national and other guidance on sustainable development'. **(2281 Wallace Land Investment and Management)**
- Request that the final paragraph of the supporting paragraph to Policy Des 6 is amended to read 'where SUDS do not need to be provided because run off will be drained by combined sewers, the measures to manage heavy rainfall such as green roofs should still be provided. Scottish Water only accepts surface water into a combined system in exceptional circumstances so it should be ensured that all reasonable efforts are made to remove surface water from the combined sewer from the outset'. **(2699 Scottish Environment Protection Agency)**

Policy Des 8

- Add a new criterion to Policy Des 8 – 'e) there is no risk to aerodrome safeguarding'. Add the circumference of the safeguarding consultation zone to the proposals map to ensure that developers have clarity on when they need to address aerodrome safeguarding. **(1023 Edinburgh Airport)**
- Amend Policy Des 8 to include a new criterion which refers to sustainable food production, 'if appropriate, elements contributing to food sustainability are incorporated'. It is considered that there should be a presumption in favour of structures associated with urban growing. **(2567 Community Land Advisory Service)**

Policy Des 9

- Amend the wording of Policy Des 9 by adding in criteria d) 'where it can be demonstrated that a five year effective land supply is not being maintained at all times, residential development will be granted if the sustainability of the proposal accords with the guiding principles of sustainable development set out in Scottish Planning Policy paragraph 29'. **(2281 Wallace Land Investment and Management)**
- Requests for greater flexibility in Policy Des 9 Urban Edge Development to include land within private garden curtilage at the Water of Leith. **(0083 Martin White)**
- Requests that the requirement for a developer to deliver significant boundary treatment within the site briefs is removed to allow for sustainable future

development. **(2086 Persimmon Homes (East Scotland)**

Policy Des 10

- Request that a specific policy on the Union Canal be included in the LDP which addresses the following:
    - Where appropriate developer contributions will be sought towards improvement of canal-side public realm and facilities;
    - Actively promotes recreational use of the waterspace and canal environs where appropriate and supports residential moorings in appropriate locations;
    - Canal-related development should maximise opportunities for surface water discharge into the canal wherever appropriate

  The Policy and/or an additional Canal Policy should make reference to the Edinburgh Canal Strategy which was recently approved by Edinburgh Council and highlight the canal hubs which were highlighted in this document. **(2702 Scottish Canals)**
- Amend criterion c) of Policy Des 10 to state '...maintains and enhances the quality of the water environment, its nature conservation or landscape interest, including its margins and river valley'. **(2699 Scottish Environment Protection Agency)**

Policy Des 11

- Amend criterion c) of Policy Des 11 to read '...impact on Key Views of landmark buildings' instead of 'important views'. **(2480 Rosebery Estates Partnership)**

Policy Des 12

- Amend wording of Policy Des 12b) to refer to the Edinburgh Design Guidance. **(2126 Cockburn Association)**

ENVIRONMENT POLICIES

General

- Considers that the Plan fails to provide explicit support for additional tourist/visitor camping facilities. Considers that, as in the case of Rural West Edinburgh Local Plan Policy E24, a policy, with criteria, should be included in this Plan which actively supports the development of additional new camping sites catering for both touring caravans and static holiday homes. It should be made clear that such developments, in appropriate circumstances are legitimate green belt and countryside uses and make a material contribution to the City tourist economy. **(2299 Forbes Marr)**
- No specific modifications requested. However, states that policies Env 8, Env 9 and Env 12 need to be significantly more flexible. **(0165 Ken Shade; 0170 A J C Clark)**
- Considers that the interiors of listed buildings need adequate protection from damaging internal alterations. **(2690 West End Community Council)**

Policy Env 1

- Requests that the name of Policy Env 1 be changed to 'World Heritage Site' to reflect the Forth Bridge potentially becoming a World Heritage Site. **(2463 Euan Leitch)**
- It would be helpful to explain 'outstanding universal value' in the Glossary. **(2126 Cockburn Association)**

Policy Env 2

- Amend the wording of Policy Env 2, by adding in a new criterion, which states 'The general presumption will be to retain buildings that make a positive contribution to their location. In this regard, where there is a conflict between retention or demolition, especially in the case of grade A and B listed buildings, greater weight should be given to retention in the decision making process'. **(2126 Cockburn Association)**

Policy Env 3

- Consider that Policy Env 3 should be made more positive by removing the words 'not detrimental to' and substituting 'it would enhance' **(1964 Grange Association).**

Policy Env 4

- Amend the wording of Policy Env 4 to 'Proposals to alter or extend a listed building will be permitted where:
    - They do not adversely affect the special character of the building; and
    - They sustain or enhance its beneficial use; or where
    - Justification is provided to establish that the proposals are necessary and provide significant alternative public benefits'.

  The supporting text should also include requirement for supporting evidence of all types including economic/feasibility studies, consideration of reasonable alternatives, as relevant to the situation **(2463 Euan Leitch).**
- Suggest the removal of 'unnecessary' in criteria b) of Policy Env 4 and change 'diminish' to 'diminution of' **(1964 Grange Association).**

Policy Env 5

- Amend the wording of Policy Env 5 by removing 'but' after 'within a conservation area'. Amend the supporting text to 'Proposals for the demolition of any building within a conservation area, whether listed or not, will not normally be permitted unless a detailed planning application is also approved for a replacement building which enhances or preserves the character of the area. Exceptionally, proposals for the landscaping of the site may be considered appropriate' **(2463 Euan Leitch).**
- Amend the wording of Policy Env 5 by replacing 'not normally permitted' with 'only be permitted in exceptional circumstances' **(1964 Grange Association).**

Policy Env 6

- Suggest that the wording of Policy Env 6 b) be changed by adding in 'shrubs' after

'trees'. Add in a new sentence to the last line of paragraph 160 which states that 'the above policies should also apply during maintenance operations, especially in the proposed felling of established trees without TPO protection, which will require Council consent.' Amend line 1 paragraph 161 of Policy Env 6 by deleting 'erode' and inserting 'damage'. The new sentence will add clarity and consider that the word 'erode' is too weak and unclear for use in a Conservation Area **(2126 Cockburn Association).**

- Paragraph 161 of Policy Env 6 states 'Conservation Area Consent may be subject to conditions or a legal agreement to link demolition works to the provision of the proposed replacement building or...' Replace 'may be' with 'should normally be' in Policy Env 6 **(1964 Grange Association).**

Policy Env 7

- Amend the wording of the policy by inserting 'and its setting as...' after 'site' to add clarity **(2126 Cockburn Association).**

Policy Env 10

- Amend the first paragraph of Policy Env 10 to state '...would not detract from the landscape quality and/or rural character of the area and/or the role of the green belt and countryside in giving access to open space'. Amend also the first sentence of the third paragraph of supporting text to state '...development does not detract from the landscape quality and/or rural character of the area and/or the role of the green belt and countryside in giving access to open space' **(0124 sportscotland).**
- Suggests including paragraph 9 of the Capital Coalition Motion (Minute of Planning Committee meeting 19 June 2014) as an additional policy under Natural Environment or in Policy Env 10. Paragraph 9 states 'In response to the representations to the Plan and recent communications, Committee agrees to continue to explore the prioritisation of building houses on Brownfield sites, including further information on possible housing densities and the requisite parking standards before releasing land in the Green belt' **(0244 Tony Gray).**
- Amend last sentence of paragraph 122 in Part 1 Section 5 of the Plan by omitting the word 'Major'. Amend Policy Env 10 by inserting 'in exceptional circumstances' in the second line following '...development will only be permitted' **(0305 Colinton Amenity Association).**
- Requests that Policy Env 10 makes reference to diversification of the rural economy in line with national policy, for example an additional criteria to allow certain types and scales of development in line with SPP. In addition to recreational use being possibly acceptable reference is made to 'essential infrastructure such as electronic communications and electricity grid connections' and 'horticulture, including market gardening and directly connected retailing'. These references should be specified as criteria within Policy Env 10 **(1048 Swanston Farms Ltd).**
- Concerned about the continued erosion of Edinburgh's green belt. More protection is needed in Policy Env 10. Add a new first policy paragraph 'within the green belt, except in exceptional circumstances, there will be a presumption against development in areas with a landscape character score of 70 or above, as derived from the Edinburgh Green Belt Strategy 2008 Stage 1'. Also in the last line after 'use' add 'and the rural setting' into criteria a) of Policy Env 10 to add clarity **(02126**

Cockburn Association).

- Amend Policy Env 10 to include a final criteria – 'e) for the redevelopment of derelict buildings, and restoration of derelict sites, in the green belt and countryside being considered on their merits where an enhancement on the landscape can be achieved in compliance with other policies in the plan'. Remove any reference to the continued use of the 'Development in the Countryside and Green Belt' planning guidance being applied **(2480 Rosebery Estates Partnership).**
- If the site previously identified as Craigpark Quarry in the Rural West Edinburgh Local Plan is not removed from the Countryside Area Policy (Issue 17), it is requested that the wording of policy Env 10 is amended. Suggested wording is as follows for criteria a) 'For the purposes of agriculture, woodland and forestry, horticulture or recreational uses that are compatible with an agricultural or natural setting, or where a countryside location is essential and provided any buildings, structures or hard standing areas are of a scale and quality of design appropriate to the use' **(2544 Tartan Leisure Ltd)**

Policy Env 10 – Housing Land Supply

- Amend Policy Env 10 to confirm that, as required by the latest SPP 'the housing land supply can be met from a number of sources'. Furthermore, amend the policy to include provision to accommodate the demands of small scale housing development by small scale householders/self build groups. Suggests land associated with the Cattery Business which could contribute to housing land supply **(2119 Colinton Country Cattery).**
- Amend Policy Env 10 and paragraph 167-169 to include a direct reference to SESplan Policy 7. Requests that an additional criterion should be added to Policy Env 10 which states 'For residential development, only if there is an identified shortfall in the City of Edinburgh's 5 year effective land supply and the proposed development would demonstrably contribute to the effective housing land supply in the short term. Development proposals must:
    - Be in keeping with the character of adjacent settlements and the local area;
    - Not undermine green belt objectives, therefore proposals must incorporate the creation of a robust Green Belt Boundary and must not encroach into open countryside within a Green Belt; and
    - Be supported by adequate infrastructure provision. Any additional infrastructure required as a result of the development but which is not already committed must be funded by the developer.' **(2279 Hallam Land Management Ltd).**

  Likewise, Wallace Land Investment Management (2281) suggest amending Policy Env 10 to set out the circumstances within which sites in the countryside and green belt should be approved, in accordance with the requirements of SESplan and SPP. Suggest adding in an additional criteria to Policy Env 10 which states 'where it can be demonstrated that the Council is not maintaining a 5 year effective housing land supply at all times, residential development will be granted if the sustainability of the proposal accords with the guiding principles of sustainable development set out in SPP paragraph 29'. If further Greenfield sites in the Green Belt are required to help maintain a 5 year effective housing land supply then this additional criterion provides the necessary development plan policy context to secure the release of land from the Green Belt in accordance with the approved Strategic Development Plan **(2281 Wallace Land Investment and Management).**

Policy Env 11 & 17

- Amend the wording of Policy Env 11 to 'Planning permission will not be granted for development which would damage or detract from the overall character and appearance of the Special Landscape Areas shown on the Proposals Map and the particular qualities for which the SLA has been designated'. Amend the wording of Policy Env 17 to 'Development which supports the aims and objective of the Pentlands Hills Regional Park and which does not impact negatively on the qualities for which the park has been designated, will be permitted' **(0124 sportscotland).**
- Delete Policy Env 11 and replace with the wording of Policy Env 11 in the first Proposed Plan **(2126 Cockburn Association).**

Policy Env 12

- Requests that the following statement is added to the supporting text to paragraph 172 of Policy Env 12 '...the Council will consider their value, taking into account status such as the guidance contained within the Scottish Government's Policy on Control of Woodland Removal, UK Forest Standard...' **(0113 Forestry Commission Scotland).**
- Insert 'sizes' after 'species in line 4 of Policy Env 12 **(2126 Cockburn Association).**
- Amend Policy Env 12 by adding in the words 'or woodland' after 'other tree'. If the Council consider that woodlands may be protected by Policy Env 15, then it would be useful to include a cross reference in the text **(2088 Scottish Government).**

Policy Env 13

- The third bullet pointed criterion from paragraph 208 of the Scottish Planning Policy should be added to Policy Env 13 as sub clause b iii **(2088 Scottish Government).**

Policy Env 15

- Consider a) and b) of Policy Env 15 should be strengthened to ensure a strong presumption against development on local biodiversity sites **(2505 Scottish Wildlife Trust).**
- Amend criteria a) of Policy Env 15 by inserting 'significantly' after 'outweigh' **(2126 Cockburn Association).**

Policy Env 18

- Amend criteria d) of Policy Env 18 by inserting 'important' after 'will be an'. Amend criteria e) of Policy Env 18 by inserting 'significantly' after 'community'. These amendments will ensure that adequate weight it given to these issues **(2126 Cockburn Association).**

Policy Env 19

- Amend the title and wording of Policy Env 19 to reflect SPP paragraph 226. The policy wording should be amended to read: 'In addition to the requirements of

Policy Env 18, the loss of some or all of an outdoor sports facility will be permitted only where one of the following circumstances applies:

- The proposed development is ancillary to the principal use of the site as an outdoor sports facility;
- The proposed development involves a minor part of an outdoor sports facility and would not adversely affect the use or potential of the remainder for sport and training;
- The outdoor sports facility which would be lost would be replaced by either a new facility of comparable or greater benefit for sport in a location which is convenient for users, or by the upgrading of an existing outdoor sports facility to provide a facility of better quality on the same site or at another location which is convenient for users and maintains or improves the overall playing capacity in the area; or
- The relevant strategy and consultation with sportscotland show that there is a clear excess of provision to meet current and anticipated demand in the area, and that the site would be developed without detriment to the overall quality of provision' **(0124 sportscotland).**

Similarly, the Scottish Government seeks the amendment of the wording of Policy Env 19, including renaming the policy to 'Outdoor Sports Facilities Protection' and substitute references to 'playing fields' throughout the policy with 'outdoor sports facilities'. Change criteria d) to bring it in line with the 4th bullet in SPP paragraph 226 by reflecting the wording in relation to the relevant strategy; and including reference to consultation with Sportscotland **(2088 Scottish Government).**

Policy Env 21

- Amend the wording of paragraph 183 to read 'Proposals will only be favourably considered if accompanied by a flood risk assessment demonstrating how compensating measures are to be carried out, both on and off the site, and that any loss of flood storage capacity is mitigated to achieve a neutral or better outcome.' **(2088 Scottish Government).**
- Amend paragraph 183 by deleting the sentence which states that 'Proposals will only be favourably considered if accompanied by a flood risk assessment demonstrating how adequate compensating measures are to be carried out, both on and off the site.' It should be replaced with 'where flood risk has been identified and a flood risk assessment has been required, proposals will only be favourably considered where the assessment identifies no increased flood risk to the site or elsewhere' **(2699 Scottish Environment Protection Agency).**
- Request that additional information relating to the Council's responsibilities under the Flood Risk Management (Scotland) Act 2009 is included in the supporting text for Policy Env 21. Suggest the following wording 'The cornerstone of sustainable flood management is the avoidance of flood risk in the first instance and the Council, with others, has responsibility to reduce overall flood risk' **(2699 Scottish Environment Protection Agency).**
- Request that criteria a) of Policy Env 21 is amended to state that planning permission will not be granted for development that would
  - 'have a significant probability of being affected by flooding;
  - would increase probability of flooding elsewhere;
  - would lead to piecemeal reduction of the functional floodplain' **(2699 Scottish Environment Protection Agency).**
- Amend the wording of paragraph 185 of Policy Env 21 by replacing the sentence

'Policy Des 6 states that these risks should be avoided by the use of sustainable drainage techniques (SUDs)' with 'The Council will consider favourably applications which can be demonstrated as neither adding to surface water run-off nor being at risk from surface water flooding or water flowing overland' **(2699 Scottish Environment Protection Agency).**

- The comments made on page 14 paragraph 43 of the Plan should be incorporated into this policy for the reasons outlined in Issue 3. **(2126 Cockburn Association)**

Policy Env 22

- Amend the wording of Policy Env 22 criteria b) replacing 'there will be no significant adverse effects on air, water and soil quality or' with 'there will be no significant adverse effects on air and soil quality and the quality of the water environment'. Also request an additional criteria which states 'opportunities should be sought for enhancement of air and soil quality and the quality of the water environment' **(2699 Scottish Environment Protection Agency).**
- Delete 'no significant' from criteria a) and b) of Policy Env 22, and insert 'minimal' **(2126 Cockburn Association).**
- Amend Policy Env 22 criterion a) to read: 'there will be no significant adverse effects arising for health and public safety, stability, the environment and amenity...' Amend criterion b) to read: ' there will be no significant adverse effects on air, water or soil quality or ground stability or...' **(02723 The Coal Authority)**

Summary of responses (including reasons) by planning authority:

DESIGN POLICIES

General

- The Council's Edinburgh Design Guidance is relevant to all new development, whether it is outwith Conservation Areas or within areas of poor architectural merit. The importance of creating better places is also supported by the Placemaking policy in Scottish Planning Policy page 12, which states that 'Planning should take every opportunity to create high quality places by taking a design-led approach.' No modification proposed. **(2086 Persimmon Homes (East Scotland))**
- The wording of certain design policies in terms of a sense of place and retaining existing features are appropriate to achieve good design and placemaking. It is reasonable to expect applicants to demonstrate that their proposals meet these requirements. No modification proposed. **(2276 Gladman Developments Ltd)**

Policy Des 3

- It is reasonable to retain the word 'potential' in the title of Policy Des 3 because the policy also encourages the provision of new habitat and enhancements to existing features. No modification proposed. **(2279 Hallam Land Management Ltd)**
- The words 'surrounding area' in Policy Des 3 encompasses elements like landscape character, views and wider habitat network, which represent context and are, therefore, important in the assessment of a planning application. No modification proposed. **(2281 Wallace Land Investment and Management)**

Policy Des 4

- The meaning of 'existing views' is explained in the Edinburgh Design Guidance. No modification proposed. **(2480 Rosebery Estates Partnership)**
- It is not considered necessary to list the local and distant views of built structures in the last paragraph of Policy Des 4. Interpretation of this policy is provided in the Edinburgh Design Guidance (page 22-26). Impact on the World Heritage Site is dealt with in Policy Env 1 and Policy Des 11. No modification proposed. **(2690 West End Community Council)**

Policy Des 5

- It is reasonable to expect applicants to demonstrate that their proposals are acceptable in amenity terms. The meaning of 'immediate outlook' as used by the Council is explained in the Edinburgh Design Guidance and no part of the term should be read out of context. It is reasonable to expect applicants to avoid cul-de-sac and single access residential layouts and gated communities. This reflects the principles set out in Designing Streets and Edinburgh Design Guidance. No modification proposed. **(2480 Rosebery Estates Partnership)**
- Reference is made to Edinburgh Design Guidance at the start of Section 2 in paragraph 136 – Design Principles for New Development. No modification proposed. **(2126 Cockburn Association)**

Policy Des 6

- Policy Des 6 sets out the carbon reduction requirements but does not prescribe particular solutions. No modification proposed. Issue 24 deals with heat mapping matters. **(0432 Greener Leith; 2687 Leith Central Community Council; 1660 Adrian Graham)**
- No modification proposed, however, the Council sees merit in this representation. The suggested wording of 'low and zero-carbon generating technologies' is set out in Section 3F of the Town and Country Planning (Scotland) Act 1997. **(2088 Scottish Government)**
- The current wording is consistent with that of many policies in the Plan which also will be used to determine applications at different levels of detail. The proposed changes would complicate and lengthen the policy unnecessarily. No modification proposed. **(2281 Wallace Land Investment and Management)**
- It is unnecessary and inappropriate to refer to the current practice of a key agency which has not itself sought change to the wording. The Council has introduced a requirement for green roofs as a response to those exceptional cases, often on central brownfield redevelopment sites, where connection to a combined sewer has been justified. This new provision is intended to ensure that even in such situations new development attenuates and filters water run-off. No modification proposed. **(2699 Scottish Environment Protection Agency)**

Policy Des 8

- The need to consider aircraft safety in landscaping proposals is included in the Edinburgh Design Guidance on pages 56 and 87. No modification proposed. **(1023 Edinburgh Airport)**
- Planning Advice Note 65 defines the different types of greenspace, including

allotments and community growing spaces, and private gardens. The type of greenspace to be provided in new development is a matter for Policy Hou 3 and Policy Env 20 and their interpretation using the Edinburgh Design Guidance and the Open Space Strategy. Policy Des 8 deals with the design of space, and should not prescribe provision of any one type of space. Proposals for structures associated with food growing and which require planning permission are assessed on their merits using the relevant policies in the Plan. No modification proposed. **(2567 Community Land Advisory Service)**

Policy Des 9

- The scope of the design policies in Part 2 Section 2 is to encourage well designed developments that relate sensitively to the existing quality and character of the local and wider environment. Policy Des 9 does not involve the principle of releasing land for certain uses. In this regard, an additional criterion is not necessary. No modification proposed. **(2281 Wallace Land Investment and Management)**
- Policy Des 9 applies to all new development situated at the edge of the urban area, irrespective of it being private garden space or not. No modification proposed. **(0083 Martin White)**
- As stated in criterion c) of Policy Des 9, the Plan supports landscape improvement proposals that will strengthen the green belt boundary and contribute to multi-functional green networks by improving amenity and enhancing biodiversity. In this regard and as supported in the Edinburgh Design Guidance, the boundary treatment being questioned can effectively contribute towards Edinburgh's Green Network. As stated in paragraph 51 of Scottish Planning Policy, 'the spatial form of the green belt should be appropriate to the location. It may encircle a settlement or take the shape of a buffer, corridor, strip or wedge. Local development plans should show the detailed boundary of any green belt...' No modification proposed. **(2086 Persimmon Homes (East Scotland)**

Policy Des 10

- The Union Canal is covered sufficiently by a number of relevant policies, for example Policy Des 10, Policy Env 8, and is mentioned as part of Edinburgh's green network (paragraph 48) No modification proposed. **(2702 Scottish Canals)**
- Consider that the current use of the word 'water quality' and 'water body' is appropriate and generally understood by a wide audience. No modification proposed. **(2699 Scottish Environment Protection Agency)**

Policy Des 11

- Policy Des 11 is intended to cover both Key Views and any other views to landmark features and important views to landscape and built features. The Key Views are defined in the Edinburgh Design Guidance. No modification proposed. **(2480 Rosebery Estates Partnership)**

Policy Des 12

- The meaning of the word 'privacy' is explained in the Edinburgh Design Guidance. No modification proposed. **(2126 Cockburn Association)**

ENVIRONMENT POLICIES

General

- Tourist/visitor camping facilities are dealt with by Policy Env 10 as they are generally considered for the purpose of countryside recreation and fall in locations where a countryside location is essential. Further detail is provided in the Development in the Countryside and Green Belt guidance. No modification proposed. **(2299 Forbes Marr)**
- Page 71 of the Monitoring Statement illustrates that the policy objectives has been met for Policy Env 8, Env 9 and Env 12. No modification proposed. **(0165 Ken Shade; 0170 A J C Clark)**
- The interior of listed buildings is not controlled by the development plan, but is a separate process dealt with through a Listed Building Consent. No modification proposed. **(2690 West End Community Council)**

Policy Env 1

- A decision has not been issued as to whether the Forth Bridge will be designated a World Heritage Site. For this reason, it is premature to amend the current wording of Policy Env 1. A decision is expected at the 29th session of the World Heritage Committee between 28 June and 8 July 2015. Following the decision in June/July, the Council sees merit in making these changes. At present, no modification proposed. **(2463 Euan Leitch).**
- The Outstanding Universal Values of the World Heritage Site are set out in the Management Plan for the World Heritage Site. No modification proposed. **(2126 Cockburn Association)**

Policy Env 2

- Paragraph 159 of the Plan states that the loss of a listed building will only be justified in exceptional circumstances, and refers to the further guidance used when weighing different considerations. No modification proposed. **(2126 Cockburn Association)**

Policy Env 3

- The current wording is consistent with Scottish Planning Policy and accurately describes the Council's practice in this matter. The relevant non-statutory guidance provides further detail. No evidence has been provided to justify a change in wording. No modification proposed. **(1964 Grange Association)**

Policy Env 4

- The current wording is consistent with Scottish Planning Policy and accurately describes the Council's practice in this matter. The relevant non-statutory guidance provides further detail. No evidence has been provided to justify a change in wording. No modification proposed. **(2463 Euan Leitch)**
- Retain the word ‘unnecessary’ in criterion b) of Policy Env 4. No modification proposed, however, the Council sees merit in changing ‘diminish’ to ‘diminution of’ as this is a grammatical correction. **(1964 Grange Association)**

Policy Env 5

- The current wording is consistent with Scottish Planning Policy and accurately describes the Council's practice in this matter. The relevant non-statutory guidance provides further detail. No evidence has been provided to justify a change in wording. No modification proposed. **(2463 Euan Leitch)**
- The current wording is consistent with Scottish Planning Policy and accurately describes the Council's practice in this matter. The relevant non-statutory guidance provides further detail. No evidence has been provided to justify a change in wording. No modification proposed. **(1964 Grange Association).**

Policy Env 6

- Policy Env 6b) provides a suggested list of features to be retained, but also states that 'other features which contribute positively to the character of the area' should be preserved. This could cover shrubs if they were felt to be of significance. No modifications proposed. With regards to the suggested modifications to paragraph 160, trees within Conservation Areas are protected by legislation at a national level. Written consent from the Planning Authority is required to carry out works to, or fell, trees in these areas. Policy Env 12 also refers to the protection of trees. No modifications proposed. With regards to the suggested modifications to paragraph 161, the word 'erode' affords the Planning Authority greater control to prevent minor incremental works that have a cumulative detrimental impact on the character and appearance of the Conservation Area. No modification proposed. **(2126 Cockburn Association)**
- The current wording is consistent with Scottish Planning Policy and accurately describes the Council's practice in this matter. The relevant non-statutory guidance provides further detail. No evidence has been provided to justify a change in wording. No modification proposed. **(1964 Grange Association)**

Policy Env 6 – Other technical changes

- Amend paragraph 162 of Policy Env 6 to add in 'new' before 'development' in the first line. This makes clear the distinction between the requirements for one dwelling or more and an extension or alteration.

Policy Env 7

- No modification proposed, however, the Council sees merit in making reference to the setting of the Historic Garden and Designed Landscape in the wording of the policy. Suggest adding in 'its setting or...' after 'adverse effects on' and before 'upon component features which contribute to its value.' **(2126 Cockburn Association)**

Policy Env 10

- It is not considered necessary to add in reference to the role of the green belt and countryside in giving access to open space in the supporting text of Policy Env 10. This is instead dealt with in paragraph 167 of Policy Env 10 and paragraph 34 in Part 1 Section 2 of the Plan, which states that the purpose of the green belt is to 'protect and give access to open space within and around the city and

neighbouring towns'. No modification proposed. **(0124 sportscotland)**

- It is not considered necessary to add in paragraph 9 of the Capital Coalition Motion (Minute of Planning Committee meeting 19 June 2014) as an additional policy under Natural Environment or in Policy Env 10. Part 2 of the Plan contains policies which generally supports development within the urban area subject to relevant policy considerations. Part 1 Section 3 of the Plan sets out how the Development Plan as a whole will be used to provide a 5 year effective land supply, which follows a 'brownfield sites first' approach. See Issue 5 for related matter. No modification proposed. **(0244 Tony Gray)**
- No modification proposed, however, the Council sees merit in the representation to remove the word 'Major' from paragraph 122. Policy Env 10 does not differentiate between different levels in the development hierarchy (e.g. national, major, local, householder) Adding in the words 'in exceptional circumstances' in the second line of Policy Env 10 following '...development will only be permitted' is not considered reasonable. The role of the policy sets out the circumstances in which development in the green belt can be supported. A development would only be permitted in exceptional circumstances if it was contrary to Policy Env 10, but considered suitable for other reasons. **(0305 Colinton Amenity Association).**
- The range of uses listed in Policy Env 10 is considered appropriate for Edinburgh Green Belt. The uses, as set out in paragraph 52 of Scottish Planning Policy, are suggestions not prescriptions. Local development plans should describe these, taking account of local circumstances. For this LDP area a specific need for new telecommunications or energy grid infrastructure development in the green belt has not been identified. Horticulture is referenced in Policy Env 10, and retail provision is made sufficiently in Part 2 Section 6 of the Plan. No modification proposed. **(1048 Swanston Farms Ltd)**
- It is considered that the criteria in Policy Env 10 are effective in controlling the type and scale of development in the green belt without including reference to the findings of a past study. It is not necessary to include the wording 'and rural setting' in criteria a) of Policy Env 10 as it already states in the first line of the policy that 'development will only be permitted where it meets one of the following criteria and would not detract from the landscape quality and/or rural character of the area'. No modification proposed. **(2126 Cockburn Association)**
- It is not considered necessary that an additional criterion is required to reflect the instances where a building has no use and is required to be redeveloped or replaced. A proposal for the redevelopment of derelict buildings, and restoration of derelict sites in the green belt and countryside would be assessed on whether it detracts from the landscape quality and/or rural character of the area, as stated in the first part of Policy Env 10 and reiterated in paragraph 169 of Policy Env 10. The redevelopment of derelict buildings would be assessed against criteria b). More detailed advice is provided in the 'Development in the Countryside and Green Belt' planning guidance. No modification proposed. **(2480 Rosebery Estates Partnership)**
- The range of uses listed in Policy Env 10 is considered appropriate for Edinburgh Green Belt. Countryside recreation does not require to be replaced by 'recreational uses that are compatible with an agricultural or natural setting'. The uses, as set out in paragraph 52 of Scottish Planning Policy, are suggestions not prescriptions. Local development plans should describe these, taking account of local circumstances. No modification proposed. **(2544 Tartan Leisure Ltd)**

Policy Env 10 – Housing Land Supply

- Part 1 Section 3 page 21 of the Plan sets out how the Development Plan as a whole will be used to provide a five year effective land supply. It sets out the sources from which the housing land supply can be met. The Plan does not contain a specific reference to small scale housing development by householders or self build groups. The Council does not consider the Cattery Business as being a suitable site to contribute to housing land supply. The location has been assessed in the Environmental Report in response to representations at earlier stages of the Plan project and found to be unsuitable for release from the green belt for a number of reasons. No modification proposed. **(2119 Colinton Country Cattery)**
- Part 1 Section 3 page 21 of the Plan sets out how the Development Plan as a whole will be used to provide a five year effective land supply. An additional policy criterion would be unnecessary. The purpose of Policy Env 10 is to set out a limited number of circumstances in which greenbelt and countryside uses can be developed. See Issue 5 for related matter. No modification proposed. **(2281 Wallace Land Investment and Management; 2279 Hallam Land Management)**

Policy Env 11 & 17

- The wording of Policy Env 11 and Env 17 provide an appropriate balance between supporting countryside recreation and protecting landscape quality. The continued use of the term special landscape area has been agreed with Scottish Natural Heritage. No modification proposed. **(0124 sportscotland)**
- The wording of Policy Env 11 was amended from the first Proposed Plan to take account of representations received to the first Proposed Plan from a Key Agency – Scottish Natural Heritage. The policy was changed to better reflect Scottish Natural Heritage / Historic Scotland Guidance on Local Landscape Designations. No modification proposed. **(2126 Cockburn Association)**

Policy Env 12

- The aims and principles of this national document are sufficiently implemented for a local development plan with Edinburgh's context by the Plan as written. No modification proposed. **(0113 Forestry Commission Scotland)**
- The Edinburgh Design Guidance provides detailed information regarding the protection of existing trees, replacement trees and landscaping schemes. The addition of the word ‘size’ is therefore, not considered necessary in the Plan. No modification proposed. **(2126 Cockburn Association)**
- The addition of the words ‘or woodland’ is not considered necessary to Policy Env 12. Paragraph 172 states the important contribution made by trees and makes reference to Ancient Woodland and Millennium Woodland. No modification proposed. **(2088 Scottish Government)**

Policy Env 13

- No modification proposed, however, the Council sees merit in this representation as worded above. Adding the third bullet pointed criterion from paragraph 208 of the Scottish Planning Policy as sub clause b iii would better reflect the wording of Scottish Planning Policy. **(2088 Scottish Government)**

Policy Env 15

- The Council does not consider it necessary to strengthen criteria a) and b) of Policy Env 15. The purpose of this policy is to protect sites of local nature conservation value and designated Local Nature Reserves from damaging development. No evidence has been provided to justify change. No modification proposed. **(2505 Scottish Wildlife Trust)**
- Current wording requires reasons to be 'sufficient', which establishes that insignificant reasons would not justify an impact. No modification proposed. **(2126 Cockburn Association)**

Policy Env 18

- The proposed addition would introduce another subjective term into the policy. Paragraph 180 explains further how criterion d) can be met with reference to the Open Space Strategy and its actions. No modification proposed. **(2126 Cockburn Association).**

Policy Env 19

- No modification proposed, however the Council, in part, sees merit in these two representations to better reflect the wording in Scottish Planning Policy. The Council agrees in changing the title of the policy from 'Playing Fields Protection'. However, the Council suggests an alternative title to that stated in the representation - 'The protection of Outdoor Sports Facilities' and suggests substituting references to 'playing fields' throughout the policy with 'outdoor sports facilities'. The Council, however, does not agree with rewording the 4th bullet. It is considered not appropriate to include references to Agencies in the wording of specific policies. **(0124 sportscotland; 2088 Scottish Government).**

Policy Env 21

- No modification proposed, however the Council sees merit in the wording change sought by the Scottish Government. The alternative wording sought by Scottish Environment Protection Agency is less clear for the purposes of development management. **(2088 Scottish Government; 2699 Scottish Environment Protection Agency)**
- Reference to the Council's responsibilities is made in the Strategy part of the Plan. In paragraph 43 of the Plan, a sentence sets out the Council's responsibility to reduce the overall flood risk. No modification proposed. **(2699 Scottish Environment Protection Agency)**
- The current wording of Policy Env 21a) allows refusal of any development which would be at risk of flooding regardless of its vulnerability. This applies to planning applications for development on sites where there are already land uses, as well as undeveloped land. No modification proposed. **(2699 Scottish Environment Protection Agency)**
- The current wording of paragraph 185 of Policy Env 21 is considered to be more generally understood by a wider audience. The suggested words 'surface water run-off', 'surface water flooding' or 'water flowing overland' are technical in nature. No modification proposed. **(2699 Scottish Environment Protection Agency)**
- The current wording of Policy Env 21 is considered appropriate in ensuring

development does not result in increased flood risk for the site being developed or elsewhere. No modification proposed. **(2126 Cockburn Association)**

Policy Env 22

- The current wording of Policy Env 22 b) is considered to be more generally understood by a wider audience. The suggested use of the words 'water environment' instead of water quality is technical in nature. An additional criteria d) which seeks for enhancement of air and soil quality and quality of the water environment, is not considered necessary. No modification proposed. **(2699 Scottish Environment Protection Agency)**
- The proposed change introduces repetition with the following criterion and the potential for development with minimal but still significant effects to avoid the need for mitigation and still comply with the policy. No modification proposed. **(2126 Cockburn Association)**
- No modification proposed. The Coal Authority's representation to the Second Proposed Plan raises an issue previously identified in its representation to the first Proposed Plan, seeking a policy basis for requiring applications to address ground stability. The Council's response at that stage directed attention to Policy Env 22. The Council considers that the reference to 'health' in the current wording of Policy Env 22 is sufficient to cover public safety. Similarly, the Council considers that reference to soil quality is sufficient to cover the issue of ground stability insofar as it is a matter for a planning authority. The Council's Environmental Assessment service operates to ensure that planning applications take appropriate account of ground stability issues as well as other soil quality and health issues. However, the Council acknowledges that the supporting text in paragraph 186 could be amended to make this explicit, for example by amending the penultimate sentence to read '...and land can present a potential pollution or safety threat if it has been contaminated or destabilised by previous activities.' **(02723 The Coal Authority)**

Reporter's conclusions:

Design Policies

NOTE: In its response to Further Information Request FIR 07 the council drew attention to 2 representations from The Coal Authority relating to policies Env 22 and RS 5 which for some reason it had not previously taken account of or reported in the Schedule 4s for Issues 22 and 24 respectively. In an attempt to rectify this the council in its FIR 07 response Appendix A has summarised the concerns expressed in those representations together with the modifications being sought in the representations and given its response in each case. The council has provided revisions to the originally submitted schedule 4s to include those 2 representations from the Coal Authority. Those matters related to policy Env 22 are reflected in the updated version of this Schedule 4 above and I have considered these in my conclusions and recommendations below. In Issue 24 a similar approach has been taken with regard to The Coal Authority's representations concerning RS 5.

General

1. I note that the council states at the outset that whilst the intention of its design policies is to comply with national policy and good practice, it recognised that the design policies

of the two adopted plans being replaced by the LDP were "not working as well as intended". In that context the council has sought to address this and provide greater clarification by restructuring the wording of policies Des 1-15 in the proposed plan and by consolidating its non-statutory design guidance. That guidance is set out in the "Edinburgh Design Guidance" (EDG) document published in May 2013. This document makes clear that the principles of the guidance are to be used alongside the policies of the development plan when the council, as planning authority, is making decisions on the design quality of proposed new developments. Furthermore, that document states at the outset that the EDG "explains how to comply with the local plan policies on design." Given the particular reliance placed on the EDG I conclude that paragraph 136 of the proposed plan should make specific reference to this document.

2. In the above context, I am satisfied that in principle the policies of the proposed plan, as clarified by the supporting text of the plan and interpreted in more detail by the EDG, accords with national planning policy principles in striving to secure high quality places by taking a design-led approach whilst providing sufficient flexibility to address particular concerns appropriate to individual circumstances. Those principles and guidance on 'Placemaking' are set out in the Scottish Planning Policy (SPP), starting at paragraph 36. I find that the proposed plan sets out particular design policies related to listed buildings and conservation areas – including policies Env 1-6 – whilst other design policies including Des 1-5, Des 7, Des 11 and 12 concern all developments including those outwith conservation areas and make appropriate reference to safeguarding local amenity. Accordingly, I do not find the criticisms outlined by Persimmon Homes (East Scotland) and by Gladman Developments, regarding the approach taken by the council in formulating its design policies, to be well founded. I conclude, therefore, that there is no justification for amending the plan to address their concerns.

Policy Des 3

3. One representation takes exception to the use of the term 'existing and potential' features in the policy title and contends that it should be replaced by 'existing and recognised features'. On the basis that the scope of the policy, amongst other matters, is intended to cover proposals where new habitats might be provided, as well as enhancements to existing habitats, I conclude that the council is justified in arguing that the title of the policy should not be modified in response to this particular representation.

4. Another representation argues that the policy's inclusion of reference to the surrounding area exceeds the scope of the Planning Act and the terms of Circular 4/1998, by seeking to impose obligations on a planning permission that relate to land not in the control of the applicant. I am satisfied that the supporting text of paragraph 139 of the proposed plan makes clear that the surrounding area in this particular context is referring to such matters as landscape character and views and wider habitats – rather than seeking to impose obligations to undertake work on land beyond the control of an applicant lodging a planning application. Accordingly I conclude that there is no justification to modify the policy wording in response to this particular representation.

5. As another representation points out, this policy acts on the council's biodiversity duty as well as according with the Edinburgh Living Landscape initiative. I note that this is a partnership project involving the council and other organisations working jointly to create and connect green areas of the city and make attractive and biodiverse landscapes for the benefit of the local community and visitors. Based on all of these considerations I conclude that no changes to the proposed policy and supporting text are merited.

Policy Des 4

6. One representation objects to this policy making reference to the impact on existing views – on the basis that views are not normally a material planning consideration – and suggests that if anything the reference should be to 'key' views with appropriate referral to the appropriate planning guidelines. I am satisfied that the supporting text in paragraph 140 of the proposed plan provides appropriate and sufficient clarification on these matters - particularly having had regard to the fact that further elaboration is set out in the EDG, including in its technical guidance section from page 21 onwards.

7. Another representation seeks a change to paragraph 140 of the proposed plan to cover particular matters, including with regard to World Heritage Sites (WHS). I am satisfied that the appropriate and indeed sufficient reference to cover all the matters raised is already provided in the plan, as supported and elaborated in the EDG. Clear reference to this is made in paragraph 136 of the proposed plan – and in policies Env 1 and Des 11 with regard to the WHS. Accordingly, I conclude that there is insufficient justification to modify the terms of this policy Des 4 or the supporting text of the proposed plan.

Policy Des 5

8. In response to criticism of the use of the term "immediate outlook" in bullet a) of this policy, I note that its meaning as used there is already explained more fully in the EDG – for example in section 2.9 under the sub-heading "Daylight, sunlight, privacy and outlook" – as well as in the associated technical guidance that follows this on Page 65. In relation to the other criticism lodged in the same representation, in my opinion it is reasonable for the supporting text of paragraph 141 to include reference to avoiding cul-de-sac and single access residential layouts amongst the principles of development design and amenity. I am satisfied that this will help ensure the integration of new developments into the neighbourhood – noting that the concept of neighbourhood recurs in the EDG.

9. One representation seeks mention of the EDG in the text supporting policy Des 5. I consider, however, that this matter is already satisfactorily addressed in the proposed plan in paragraph 136. There, as part of the overriding statement on design principles prior to the elaboration of design policies 1-15, it is made clear that more detailed advice on how to interpret and apply all of those policies is set out in the guidance document. Based on all of these considerations I conclude that there is no justification to modify the terms of this policy Des 5 or the supporting text of the proposed plan.

Policy Des 6

10. A number of representations refer to this policy's mention of carbon emissions reduction targets. I note that whilst no means of achieving those is detailed in the policy itself, Issue 24 deals with heat mapping matters. In this context, I am not persuaded that the case for modifying the policy wording or its supporting text in paragraphs 142-147 has been made satisfactorily as different solutions and possible options to achieve the required result will apply in particular circumstances that cannot all be specified in the plan itself. I also find that the current wording of the policy is consistent with that of other policies of the plan aimed at assessing planning applications at differing scales and varying levels of detail. Furthermore, I note that this is in line with the principles set out in the National Planning Framework 3 document – which refers to sustainable well designed places – and those principles are echoed and highlighted throughout the Scottish

Planning Policy document. On this basis I conclude that there is insufficient reason to modify the terms of this policy in the manner being advocated by Wallace Land Management and others – and, as the council points out, to do so would complicate and lengthen the policy unnecessarily. This also applies to such matters as the expense of retro-fitting which in my view is a detailed consideration that would not be appropriately covered in the policy wording itself, which cannot cover every eventuality. I conclude that the supporting text and the EDG document provide sufficient elaboration on these and other detailed matters.

11. For consistency with the appropriate legislation and national planning policy guidance on these matters, I am, however, persuaded by the Scottish Government representation that the wording of the concluding phrase of policy Des 6a) should be altered to refer to "low and zero-carbon generating technologies" rather than as stated in the proposed plan. I note that such a modification is now endorsed by the council.

12. Whilst a suggested amended wording for paragraph 147 has been put forward by SEPA with reference to Scottish Water I note that no such request for word changes has been made by Scottish Water in this regard. Taking this into consideration I conclude that no such modification is merited. In my opinion the council has set out a persuasive case in respect of the requirements for green roofs to cover the exceptional cases where connection to a combined sewer has been justified. Further elaboration on green roofs is set out in the EDG – for example on page 57. In summary, I conclude that no modifications to the proposed plan are justified to address the matters raised by SEPA – particularly when the policy wording and supporting text in the plan itself cannot address every eventuality.

Policy Des 8

13. One representation sets out a case for this policy to add a new criterion relating to aircraft safety zones. For a number of reasons I am not persuaded that this is justified. Firstly, the aircraft safety zones are clearly shown on the Proposals Map and elsewhere in the plan – notably in policy Tra 11, which is a policy specifically related to those zones. Furthermore, in the EDG – particularly on pages 57 and 87 - there is also specific reference to the need to consider aircraft safety in landscape proposals. Based on all of these considerations I conclude that there is no need for a modification to policy Des 8 to address the concerns raised in this representation.

14. Another representation seeks the inclusion of a new criterion for this policy to refer to sustainable food production. I am satisfied that the council in its response has set out detailed reasons why this is not justified – with reference to Planning Advice Note 65 as well as having regard to other policies of the proposed plan, notably policies Hou 3 and Env 20. I find those policy based arguments compelling, particularly as they accord with the broad principles set out in the Scottish Planning Policy, including with regard to placemaking. I also find that other related aspects of the matters raised are already addressed satisfactorily elsewhere through the policy interpretation provided by EDG and in the council's Open Space Strategy. Based on all of these considerations I conclude that there is insufficient reason to modify the plan in response to this particular representation.

Policy Des 9

15. One representation, citing Scottish Planning Policy, contends that policy Des 9

should have an additional criterion setting out the circumstances within which development proposals on the urban edge might be approved to meet a projected shortfall in housing land supply over the plan period. I consider that this would be wholly inappropriate for the following reasons. Firstly, policy Des 9 is intended to apply to all new development proposals at the edge of the urban area. In particular, the policy sets out to ensure only well designed developments that relate sensitively to the existing quality and character of the local and wider environment are approved. I also note that the supporting text in paragraph 150 of the proposed plan makes clear reference to the importance of the green belt boundary and its defensibility. Policy Des 9 is not intended to set out the circumstances whereby land might be released to meet projected shortfalls in housing land – or indeed for other purposes. Housing land requirements and associated site releases are dealt with in detail elsewhere in the plan - notably in Part 1 section 3 and Part 2 section 5. Furthermore, our report in relation to Issue 23 addresses specific issues raised with regard to the policy approach to additional housing land releases, including in respect of the terms of policy Hou 1 in the new plan. Based on all of these considerations, I conclude that there is no justification to modify policy Des 9 in the manner being sought.

16. Another representation argues that the application of this policy is too restrictive, with particular reference to private garden ground adjoining the Water of Leith. In response, as stated earlier, the policy applies to all new development at the edge of the urban area – and so the fact that in some cases it may be private garden ground is not relevant in my view. Accordingly, I conclude that the case put forward for modifying the plan in response to this representation is not persuasive.

17. The last representation on this policy expresses concerns about what is perceived as the 'excessive' 50 metre width of tree belts on some site briefs and what is regarded as the constraint imposed by this policy which will not afford opportunities to provide good connectivity between developments in future. However the policy applies to strengthening the green belt boundary and providing green networks and does not stipulate a 50 metre boundary. Matters relating to specific sites and boundaries are addressed where raised in terms of specific sites. I agree that connectivity between sites is an important consideration but so is the establishment of a robust and defensible green belt boundary. The policy seeks to actively promote landscape improvements not only to strengthen the green belt but also "to contribute to multi-functional green networks by improving amenity and enhance biodiversity." Accordingly, I regard the current policy wording is sufficient in establishing the parameters for the detailed consideration of site specific landscaping proposals.

18. I also note that these principles are underlined and elaborated in the EDG – for example in sections 1.4, 1.7 and most notably in section 3.1 which is headed Green infrastructure and green networks. Furthermore, as the council points out, paragraph 51 of the Scottish Planning Policy makes specific reference to the spatial forms of green belts, which should be appropriate to the location and may include a buffer, corridor, strip or wedge. Based on all of these considerations I conclude that it would be inappropriate to modify the plan in response to this representation.

Policy Des 10

19. The first representation seeks the proposed plan to support on-going regeneration of the Union Canal – either through an amendment of policy Des 10 or in a new "canal policy" making reference to the council's approved 'Edinburgh Canal Strategy', which

highlights the role of "canal hubs". In my view, for a number of reasons there is not a compelling case for modifying the plan to address these concerns. Firstly, policy Des 10 in the proposed plan already makes specific reference to the Union Canal and sets out specific criteria aimed at ensuring that new developments provide an attractive frontage, maintain or improve not only public access to the water and its recreational use – as well as maintaining and enhancing the water quality and the nature conservation and landscape interest of the water body concerned. Furthermore, in Part 1 of the Plan in section 2 headed "A Plan to Protect and Enhance the Environment" under the sub-heading Green Network once again specific mention is made (in paragraph 49) regarding the role of the Union Canal and its contribution to that green network. Based on all of these considerations I conclude that there is insufficient justification to modify the plan to include an additional special policy or other amendments to further support the Union Canal's regeneration.

20. The only other representation, having had regard to the Water Framework Directive objectives, seeks amendments to criterion c) of the policy in order to facilitate improvements to the water environment and to avoid adverse impacts in that regard. The council responds by arguing that criterion c) is not in need of amendment as its inclusion of references to 'water quality' and 'water body' are terms generally understood by a wide audience'. For the following reasons I do not find the council's response persuasive given the importance of ensuring that the plan is consistent with other policy documentation of relevance.

21. As SEPA points out, The Water Framework Directive of 2000 (WFD) in order to meet its overall objective - of ensuring that all inland and coastal waters within defined river basin districts reach at least good status by 2027 - sets out a two-pronged approach involving measures which both (i) prevent deterioration and (ii) promote improvements in the water environment. River Basin Management Plans (RBMP) contain measures to maintain and improve water bodies in order to reach good ecological status and are a material planning consideration. The aim is to improve the quality of the whole water environment rather than individual aspects of it.

22. In this context, the land use planning system has been identified as having a key role to play in delivering the requirements of the WFD through its influence on the location, layout and design of new development. As well as ensuring future development does not result in further downgrading of the water body, land use planning can ensure improvements in the water environment by addressing existing historical pressures relating to water quality, quantity and morphology. Furthermore, the National Planning Framework 2 confirmed the importance of Development Plans delivering River Basin Management Plan objectives, stating (in paragraph 177) that "there will be a need for effective interaction between development plans and River Basin Management Plans in this strategic approach to water management".

23. Based on all of these considerations I am persuaded by the arguments put forward by SEPA. I conclude that it is important to ensure that any development coming forward has due regard to the Water Framework Directive objectives of protecting and improving the water environment – in summary to facilitate positive improvements in the water environment while ensuring that any adverse impacts are avoided where possible. Accordingly, I conclude that part (c) of the wording of policy Des 10 should be modified to read:

c) maintains and enhances the quality of the water environment, its nature

conservation or landscape interest, including its margins and river valley.

Policy Des 11

24. The sole representation seeks an amendment to criteria c) of this policy to make reference to the protection of identified and mapped 'Key Views' – rather than referring simply to "important views". As the supporting text of paragraph 152 of the proposed plan makes clear, the policy wording is intended to address not only 'key views" but also any other views to landmark features as well as important views to landscape and built features. It states that this is necessary to protect some of the city's most striking visual characteristics as well as the views (from many vantage points within the city and beyond) of landmark buildings and the city's skyline including its undeveloped hills together with the surrounding countryside and coast – which in combination provide a unique landscape setting for Edinburgh. I note that the 'key views' referred to are detailed in section 1.3 of the EDG on pages 22 -25. Based on all of these considerations I conclude that a modification to the plan in response to this representation is not merited.

Policy Des 12

25. A representation seeks the wording of criterion b) of this policy to cross-refer to the EDG in order to address concerns about the meaning of the term "no unreasonable loss of privacy.' Having established that privacy is one of the matters considered in some detail in the EDG – notably in section 2.9 – I am satisfied that the concerns expressed are already satisfactorily addressed in the proposed plan in paragraph 136. There, as part of the overriding statement on design principles prior to the elaboration of design policies 1-15, it is made clear that more detailed advice on how to interpret and apply all of those policies is set out in the guidance document. Accordingly, I conclude that there is no justification to merit modifying the plan in response to this particular representation.

Environment Policies

General

26. The first representation seeks more recognition in this section of the plan for the role played by camping, touring caravans and static holiday homes in the tourist/visitor economy of Edinburgh - and for it to make clear that such uses are acceptable in the green belt and countryside. I note that policy Env 10 of the plan sets out criteria for acceptable developments in the green belt and countryside and this specifically includes reference to countryside recreation. The council confirms that tourist/visitor camping facilities generally fall into this category – and points out that further detail is set out in its guidance note on Countryside and Green Belt. Based on all of these considerations I conclude that there is no need to modify the proposed plan to address the concerns raised in this representation.

27. There are general concerns expressed about the perceived lack of flexibility of policies Env 8, Env 9 and Env 12 – with specific issues raised about tree preservation orders. The representations, however, do not seek any particular amendments to the proposed plan. As the council points out, the Monitoring Statement confirms that the objectives of the policies outlined have been met. Based on the available evidence I conclude that the terms of the policies do provide a suitable degree of flexibility in their interpretation to allow for differing circumstances to be addressed appropriately. In summary I conclude that there is insufficient justification to amend the plan to address the

matters raised in these representations.

28. Another representation expresses concerns about safeguarding the interiors of listed buildings from inappropriate alterations. I find that these matters are covered by policy Env 4 of the plan - as well as in related legislation and regulations concerning the granting of listed building consent that do not fall within the scope or control of the local development plan itself. Accordingly, I conclude that there is not sufficient reason to modify the terms of the plan to address the particular points being raised.

Policy Env 1

29. This representation draws attention to the fact that during the finalisation of the new plan the Forth Bridge was being considered by UNESCO for formal designation as a World Heritage Site – and argues that any such designation should be reflected in the new plan. This replicates a representation (from the same person) considered by me in some detail as part of Issue 3 of this examination under the heading World Heritage Sites. To avoid duplication here, I refer to and rely on my assessment, conclusions and recommendations on this matter set out in Issue 3 where my recommendation was to modify the plan to address the updated position.

Policy Env 2

30. This representation seeks an amendment to the policy wording to provide greater weight to the presumption in favour of retention rather than demolition of listed buildings. I am not persuaded that this is necessary given the existing wording of the policy and the supporting statement in paragraph 159 of the plan that confirms that the loss of a listed building will only justified in exceptional circumstances. Accordingly I conclude that no modification to the plan is merited.

Policy Env 3

31. Whilst the representation seeks an amendment to the policy wording, I note that the existing wording is already consistent with the terms of the Act and the Scottish Planning Policy on the matter of concern – notably in its paragraph 141. I conclude, therefore, that there is not sufficient justification to modify the plan in the manner being advocated in the representation.

Policy Env 4

32. As above, one representation seeks an amendment to the detailed policy wording – but once again I note that the existing wording used is consistent with the terms of the Scottish Planning Policy on this matter – notably in its paragraph 141. I conclude, therefore, that there is no justification to modify the plan in the manner being suggested in this representation. I am persuaded, however, that it would be appropriate to replace the word ‘diminish’ in criterion b) of the policy to ‘diminution of’ in order to be grammatically correct.

Policy Env 5

33. There are two separate representations putting forward suggestions for possible amendments to the wording of this policy, both aimed at improving clarity and avoiding potential confusion. Nevertheless, as the existing wording of the policy is consistent with

Scottish Planning Policy, including its paragraph 143, I do not find either of the cases put forward compelling. Accordingly I conclude that there is insufficient reason to modify the plan in response to either of the representations.

Policy Env 6

34. One of the representations seeks changes to the wording of bullet b) of this policy to include shrubs and an additional sentence at the end of paragraph 160 to further safeguard trees. For a number of reasons I am not persuaded that either of these suggested alterations is merited. On the first point, I note that whilst policy Env 6b) lists a number of items it also adds the phrase "and other features which contribute positively to the character of the area." I am satisfied that this could include shrubs if they were regarded as significant in their contribution. I also find that the protection of trees is already secured in a number of ways – including by national legislation with regard to trees in conservation areas, whereby prior written consent is required from the planning authority. Furthermore, policy Env 12 - Trees of the proposed plan is specifically aimed at protecting trees. Based on all of these considerations I conclude that there is no justification to amend the terms of policy Env 6 or the text of paragraph 160 in the manner being proposed in the representation.

35. Two representations seek particular changes to the terms of paragraph 161 supporting policy Env 6. I do not find compelling the arguments put forward in support of those suggestions. Instead I find that the current wording in the plan directly reflects the terms used in paragraph 143 of the Scottish Planning Policy on these matters. Furthermore, as the council points out, use of the term 'erode' gives the planning authority more flexibility and control in achieving the aims of the policy. In conclusion I am not persuaded that there is merit in amending the wording of the plan to address the concerns raised.

36. Whilst noting the "technical change" put forward by the council – in particular a possible amendment to paragraph 162 to add the word "new" before development – I also note that this is not in response to a representation. Accordingly, whilst I see merit in the change proposed, procedurally this is a matter that the council would need to address of its own accord rather than as a formal recommendation from me.

Policy Env 7

37. The only representation puts forward a suggested change to the wording of this policy. Like the council, I recognise that this would be beneficial. This is because in my view it would add clarity to the intention of the policy. Accordingly I conclude that the wording of the policy should be amended in the terms now agreed by the council.

Policy Env 10

38. I am not persuaded that it is necessary to make changes to the first paragraph of Policy Env 10 in the manner suggested by Sportscotland. This is because in my opinion the matter of concern is already dealt with satisfactorily in the supporting text of paragraph 167. There, amongst other things, it is made clear that it is important to control the type and scale of development in the green belt to safeguard its important roles and purposes.

39. I also do not find compelling the case put forward (for inclusion within this policy or

as a new environmental policy) referring explicitly to paragraph 9 of the Capital Coalition Motion. Instead I am persuaded by the detailed arguments articulated by the council in its response. In summary the plan in Part 1 section 3 sets out how the plan as a whole is to be used to deliver a 5 year effective housing land supply, where possible drawing on brownfield sites first - and matters related to this are discussed elsewhere in this report under Issue 5. There the issues related to the programming of the land supply are explored in the context of meeting the SESplan target for housing releases over the plan period – such that some limited green belt releases would be allowed in specific circumstances even though the preference remains for brownfield releases to be actioned as a first preference. Meanwhile, the policies of Part 2 of the plan, including the environment policies such as Env 10, seek to support developments in the urban area provided that they meet specified criteria. Accordingly, I conclude that there is no justification for a modification to the plan to address the point raised in the representation.

40. Having had regard to the terms of this policy, and in particular the fact that this green belt policy does not differentiate between different scales of development proposals, I conclude that for consistency it is important to remove the word 'Major' from the beginning of paragraph 122 on page 69 of the plan. I also agree with the council's detailed justification leading to the conclusion that it is not necessary to amend the terms of policy Env 10 in the manner being sought in the same representation.

41. I am persuaded by the council's arguments supporting its contention that the range of uses listed in policy Env 10 is appropriate for the Edinburgh green belt. I reach this conclusion having had regard to the terms of paragraph 52 of the Scottish Planning Policy where possible types and scales of uses within a green belt are suggested - but the list there is neither exhaustive nor prescriptive, as indicated by the use of the term "may include ..". Most importantly, that paragraph of the SPP states at the outset that local development plans should describe the types and scales of development that would be appropriate within a green belt [in that particular plan area]. Accordingly, I conclude that there is insufficient justification to merit detailed modifications to the policy wording in the manner being advocated in the representations put forward by Swanston Farms Ltd and Tartan Leisure Ltd. I have given detailed consideration to the other site specific representations lodged in respect of Craigpark Quarry elsewhere in this report under Issue 17.

42. Whilst noting the suggested changes to the policy being advocated by the Cockburn Association I do not find their supporting arguments compelling for a number of reasons. Firstly, I am satisfied that the detailed terms of the policy are already exhaustive in their coverage and clear in their meaning. In this context I conclude that there is no need for cross-references to earlier studies or additional mention of the rural area (in criteria a). Instead I conclude that the policy wording and the supporting text of paragraphs 167 and 168 as being sufficient, without further changes being required or merited.

43. Based on the same reasoning I do not regard it as appropriate or necessary to add an additional criterion to deal with redundant buildings in the green belt or wider countryside. This is because in my view the policy already sets out the criteria and terms for assessment of proposals for such buildings – and these matters are elaborated in paragraph 169, underlining the need to ensure that developments do not detract from the landscape quality and rural character of the area.

Policy Env 10 - Housing Land Supply

44. A number of representations seek changes to the terms of policy Env 10 with a view to including consideration of sites in the green belt and countryside for housing development in specified circumstances. In particular they argue that this might be merited on appropriate sites in order to ensure that the plan area as whole provides sufficient land to meet the five year effective housing land supply requirements. I reject this approach on the basis that elsewhere – notably in Part 1 Section 3 – the proposed plan sets out how it will provide a 5 year effective housing land supply at all times throughout the plan period. Issue 5 of this report provides a detailed assessment in that regard and I rely on its conclusions and recommendations. Furthermore, our report in relation to Issue 23 addresses specific issues raised with regard to the policy approach to additional housing land releases, including in respect of the terms of policy Hou 1 in the new plan. Policy Env 10, as currently drafted, sets out the limited circumstances in which green belt and countryside areas can be developed – with proposals being considered against the criteria of the policy on a case by case basis, not as a means to make up any shortfall in existing planned provision of housing land elsewhere across the plan area.

45. Accordingly, I conclude that it is not appropriate to amend the terms of policy Env 10 or the supporting text of paragraphs 167-169 in the manner being advocated by those making representations. Meanwhile, I note that a number of additional sites have been put forward in representations seeking their inclusion as new housing allocations in the plan. These have been assessed on their individual merits by the council and considered elsewhere in this report, where appropriate.

Policies Env 11 and 17.

46. For a number of reasons set out below I am not persuaded that there is merit in changing the terms of these policies in response to the concerns expressed related to Special Landscape Areas (SLAs). Firstly, I note that the wording used in policy Env 11: Special Landscape Areas in the proposed plan reflects changes sought in earlier representations from Scottish Natural Heritage (SNH) – and the term is used with their agreement. I am also satisfied that the current wording now better reflects the guidance provided by SNH and Historic Scotland, including with regard to SLAs as local landscape designations. Furthermore, I am persuaded by the contention made by the council that the wording of policies Env 11 and Env 17 provide an appropriate balance - protecting landscape quality whilst supporting countryside recreation opportunities provided that they would not have an unacceptable level of impact on the special character or qualities of the designated areas concerned. Accordingly, based on the available evidence I conclude that there is insufficient justification to modify the plan in response to the concerns expressed in this representation.

47. Another representation expresses a preference for the wording of the version of policy Env 11 in the first proposed plan, on the basis that in their view the new wording in the current proposed plan provides a weak protection for SLAs. I reject this suggestion on the basis that the wording of this policy used in the first plan was subsequently changed to that set out in the proposed plan for two important reasons. In particular, I note that the wording now being used in policy Env 11 takes account of the representations on the wording made by Scottish Natural Heritage and I recognise that it now better reflects the guidance on local landscape designations provided by SNH and Historic Scotland. Accordingly, I am satisfied that the wording now is robustly based and

conclude that there is insufficient reason to justify amending the terms of the policy set out in the proposed plan in response to this representation.

Policy Env 12

48. I note that the council does not accept the need for an explicit reference to be made in the plan to the Scottish Government's guidance on Control of Woodland Removal and UK Forest Standard. In my view, however, the council's simple dismissal is not sufficient reason for rejecting this representation, as this is a matter that should be an on-going concern. Indeed I am persuaded that there would be merit in amending the wording of paragraph 172 of the proposed plan to incorporate a cross-reference to this Scottish Government guidance as part of the overall assessment of proposals. Accordingly, I conclude that the wording of the second sentence of paragraph 172 of the plan should read as follows: "In assessing proposals affecting trees the council will consider their value, taking into account current Scottish Government guidance – presently contained in its Policy on Control of Woodland Removal and UK Forest Standard – and their status such as Tree Preservation Order, heritage tree, Ancient Woodland and Millennium Woodland, along with information from tree surveys."

49. Whilst another representation seeks a further change to insert the word 'size' to be placed alongside the reference to species of trees in the last sentence of this policy, I do not find the case made for this compelling. This is because further detailed clarification on this is already provided in the EDG document. There sections 3.4 and 3.5 on Trees and Planting are extensive in their coverage of these matters and they are supported by technical guidance on page 88, which includes details on size at planting in differing cases. On this basis I conclude that there is no requirement for the plan itself to go into such details.

50. The council argues there is no need to add an additional reference to woodland in the policy, as the supporting text of paragraph 172 already makes reference to Ancient and Millennium woodlands. In my opinion as the policy is intended to cover woodlands more generally and also extends beyond dealing with single trees, this could be made more clear in the policy. I conclude, therefore, that a modification to the wording of the policy is merited in this particular case with the first sentence of policy Env 12 being changed to read:

'Development will not be permitted if likely to have a damaging impact on a tree protected by a Tree Preservation Order or on any other tree or woodland worthy of retention unless necessary for good arboricultural reasons.' [the second sentence of the policy wording would remain unaltered].

Policy Env 13

51. I consider it important that the terms of this policy accord with the relevant principles set out in the Scottish Planning Policy (SPP). Under the overall heading Valuing the Natural Environment, the SPP has a section on International Designations starting (at paragraph 207) with Natura 2000 Sites. The existing wording of policy Env 13 replicates the criteria for those sites set out in paragraph 208 of the SPP but omits the third of these, for no apparent reason. The council acknowledges this error. Accordingly, I conclude that this omission should be rectified by adding a third bullet point under the sub heading b) to (replicate the relevant wording of the SPP):

b) iii compensatory measures are provided to ensure that the overall coherence of the Natura network is protected.

Policy Env 15

52. I am not persuaded that either of the suggested modifications to this policy put forward in separate representations is justified or merited. I note that this policy seeks to protect (from damaging developments) Local Nature Reserves and other sites of local importance with regard to nature conservation value. I am satisfied that the existing wording of the policy and the supporting text already provides clarity as to how and when this policy is to be applied – such that there is no need to add additional phrases such as "strong presumption" or "significantly", as being advocated by the representations. Accordingly, I conclude that the cases put forward for wording changes to this policy are not compelling.

Policy Env 18

53. Based on similar reasoning to that set out above in respect of my findings and conclusions relating to policy Env 15, I am not persuaded that there is a need to add the word "important" as suggested by the representation. In this case I find that the policy wording is already clear in its terms - and its aims and meaning are elaborated in the supporting text of paragraph 180. Accordingly, I conclude that the case put forward for additional wording to this policy is not compelling and so does not merit a modification.

Policy Env 19

54. Having had regard to the Scottish Planning Policy (SPP) I am persuaded that some of the concerns raised in the representations merit changes to the terms of this policy – and I note that this is acknowledged by the council. In particular I am concerned to ensure that this policy accords with the principles set out in the section of the SPP related to these matters – notably paragraph 226 - which deals with outdoor sports facilities, rather than playing fields, as a distinct category. That same paragraph of the SPP then proceeds to set out policy criteria with regard to establishing the acceptability or otherwise of proposed new developments. On this basis I endorse the position of the council that the policy heading should become "The Protection of Outdoor Sports Facilities" and that all subsequent references to 'playing fields' in the policy wording and in the supporting text of paragraph 181 should instead be replaced with 'outdoor sports facilities'. I conclude that the council is justified in its assertion that no other changes to the policy wording are merited. I also share the council's view that the policy wording should avoid making an explicit reference to the role of other agencies, such as Sportscotland.

Policy Env 21

55. I consider it important that the terms of this policy accord with the principles set out in the Scottish Planning Policy (SPP) with regard to flood protection. The SPP includes a whole section devoted to considerations of managing flood risk and drainage, set out in paragraphs 254-268. In this context I am persuaded of the merit of the argument put forward by the Scottish Government and the Scottish Environment Protection Agency (SEPA) for changing some wording of the supporting text following on from policy Env 21. I note that those changes proposed by the Scottish Government to paragraph 183 of the plan have been acknowledged by the council as being beneficial. Having regard to the future use of the policy, including for Development Management purposes, I share the

view of the council that the alternative policy wording put forward by SEPA would be less clear. Based on all of these considerations, I conclude that the penultimate sentence of paragraph 183 should now read:

'Proposals will only be favourably considered if accompanied by a flood risk assessment demonstrating how compensating measures are to be carried out, both on and off the site, and that any loss of flood storage capacity is mitigated to achieve a neutral or better outcome.'

56. For the following reasons I am satisfied that the other concerns raised by the Scottish Environment Protection Agency in respect of policy Env 21 are either already been addressed in the proposed plan or do not merit changes to the plan. Firstly, I note that in Part 1 of the proposed plan paragraph 43 includes a reference to the role and responsibility of the council to reduce flood risk. Secondly, policy Env 21 already enables the planning authority to refuse planning permission for any development at risk of flooding – irrespective of whether or not the site concerned has existing uses. Furthermore, whilst SEPA puts forward a suggestion for re-wording of paragraph 185 I do not regard this as necessary – on the basis that the existing wording is sufficiently clear to the reader on the matters of concern.

57. Finally, I am not persuaded by the arguments put forward for repeating in policy Env 21 arguments set out earlier in paragraph 43 of the plan concerning flood risk. In summary, I conclude that subject to the above recommended changes to the plan text, the wording of the policy is sufficiently clear without change and in any event the plan should be read as a whole, so removing the need to repeat points made in different sections.

Policy Env 22

58. As it did in respect of policy Des 10, discussed above, The Scottish Environment Protection Agency makes reference to the Water Framework Directive objectives, in support of its suggested amendments to criterion b) of policy Env 22. Once again the council has responded by arguing that there is no need to change 'water quality' - a term generally understood – to 'water environment', which it regards as a technical term. For the reasons set out in paragraphs 21 and 22 above, I do not find the council's response persuasive given the importance of ensuring that the plan is consistent with other policy documentation of relevance.

59. Based on all of these considerations I am persuaded by the arguments put forward by SEPA. I conclude that it is important to ensure that any development coming forward has due regard to the Water Framework Directive objectives of protecting and improving the water environment – in summary to facilitate positive improvements in the water environment whilst ensuring that any adverse impacts are avoided where possible. I am also persuaded that there is merit in the policy addressing the concerns raised by The Coal Authority – in short seeking to safeguard public safety by ensuring that developments would not have significant adverse effects on ground stability. Whilst the council does not endorse such a change it does acknowledge that the supporting text of paragraph 186 should be amended to make this explicit. In my opinion the text changes now being advocated by the council to address these concerns are sensible but would be given added strength if the matter was also highlighted in the policy itself. Based on all of these considerations I conclude that criterion (b) of policy Env 22 should be modified to read as follows:

b) 'there will be no significant adverse effects on: air and soil quality; the quality of the water environment; or on ground stability'.

60. For the reasons outlined above I also conclude that the penultimate sentence of paragraph 186 of the plan should be modified to read " … and land can present a potential pollution or safety threat if it has been contaminated or destabilised by previous activities."

61. I do not, however, find compelling the other argument put forward by SEPA for an additional criterion c) – as in my view this is not necessary and would be inappropriate as a stated pre-requisite for gaining planning permission. I am also not persuaded by the suggested changes to the policy wording of criteria a) and b) put forward by the Cockburn Association. In my opinion those suggested changes are not justified and would introduce unnecessary repetition, having had regard to the terms of criterion c) of the policy which already refers to minimising adverse effects. Accordingly, I conclude that no further modifications to the policy wording are merited.

Reporter's recommendations:

Modify the proposed plan as follows:

1. Modify paragraph 136 of the plan by adding at the end of it the phrase "… including in the Edinburgh Design Guidance document."

2. Modify policy Des 6 of the plan by changing section a) to read:

a) the current carbon dioxide emissions reduction target has been met, with at least half of this target met through the uses of low and zero-carbon generating technologies.

3. Modify policy Des 10 of the proposed plan by changing part (c) to read:

c) maintains and enhances the quality of the water environment, its nature conservation or landscape interest, including its margins and river valley"

4. Modify policy Env 4 by replacing the word 'diminish' in bullet b) with the words 'diminution of'

5. Modify policy Env 7 by changing the wording of the first sentence to read as follows:

Development will only be permitted where there is no detrimental impact on the character of a site recorded in the Inventory of Gardens and Designed Landscapes, adverse effects on its setting or upon component features which contributed to its value. [the remainder of the policy wording would remain unchanged]

6. Modify paragraph 122 of the plan (on page 69) by removing the word 'Major' from the beginning of the last sentence.

7. Modify paragraph 172 of the plan by changing the wording of the second sentence to read as follows:

"In assessing proposals affecting trees the council will consider their value, taking into account current Scottish Government guidance – presently contained in its Policy on

Control of Woodland Removal and UK Forest Standard – and their status such as Tree Preservation Order, heritage tree, Ancient Woodland and Millennium Woodland, along with information from tree surveys."

8. Modify policy Env 12 by changing the first sentence to read:

"Development will not be permitted if likely to have a damaging impact on a tree protected by a Tree Preservation Order or on any other tree or woodland worthy of retention unless necessary for good arboricultural reasons." [the second sentence of the policy wording would remain unaltered].

9. Modify policy Env 13 by adding at the end of it an additional bullet b) iii to read as follows:

b) iii compensatory measures are provided to ensure that the overall coherence of the Natura network is protected.

10. Modify policy Env 19, firstly, by changing its title to read "The Protection of Outdoor Sports Facilities and then change all subsequent references to 'playing fields' in the policy wording and in the supporting text of paragraph 181 to read instead 'outdoor sports facilities'.

11. Modify paragraph 183 of the proposed plan by changing the penultimate sentence of to now read: 'Proposals will only be favourably considered if accompanied by a flood risk assessment demonstrating how compensating measures are to be carried out, both on and off the site, and that any loss of flood storage capacity is mitigated to achieve a neutral or better outcome.'

12. Modify policy Env 22 of the plan by changing criterion (b) to read as follows:
b) 'there will be no significant adverse effects on: air and soil quality; the quality of the water environment; or on ground stability'.

13. Modify paragraph 186 of the plan by changing the penultimate sentence to read " … and land can present a potential pollution or safety threat if it has been contaminated or destabilised by previous activities."

Issue 23	**Employment, Housing & Retail policies**	
Development plan reference:	**Part 2 Section 4 pages 94 - 98** **Part 2 Section 5 pages 99 - 103** **Part 2 Section 6 pages 104 – 110**	**Reporter:** Allison Coard

Body or person(s) submitting a representation raising the issue (including reference number):

0124 sportscotland
0194 Corstorphine Community Council
0241 Theatres Trust
0364 Craigleith/Blackhall Community Council
0381 Jez Kempston
0748 S Harrison Developments Ltd
0799 NHS Lothian Public Health & Health Policy
0828 Network Rail
0836 Heriot-Watt University
0838 Gibraltar General Partner Ltd
1140 Diana Cairns
1141 Fairmilehead Association
1154 CALA Management Ltd
1170 A J C Clark
1901 Stephen and Joan Carter
2088 Scottish Government
2126 Cockburn Association
2172 Southside Association
2192 Edinburgh Bioquarter Partners
2269 Essel Securities plc
2271 Vita Edinburgh 1 Limited
2276 Gladman Developments Ltd
2279 Hallam Land Management Ltd
2281 Wallace Land Investment and Management
2290 Edinburgh Chamber of Commerce – Developer's Group
2299 Forbes Marr
2317 Edinburgh Napier University
2320 Edinburgh University Students' Association
2341 New Town & Broughton Community Council
2354 Grange/Prestonfield Community Council
2440 Unite Group plc
2443 University of Edinburgh
2505 Scottish Wildlife Trust
2536 Parc Craigmillar Ltd
2568 Stephen Hawkins
2569 Town Centre Securities plc
2657 Hilary McDowell
2673 Sheila Gilmore MP
2676 Flying Scot Parking (Edinburgh) Ltd
2677 Turley
2680 National Union of Students Scotland
2684 Homes for Scotland
2690 West End Community Council
2698 Prem Rooster Ltd
2713 McCarthy and Stone Retirement Lifestyle Ltd
2719 Royal Mail Group

Provision of the development plan to which the issue relates:	This issue relates to three chapters in Part 2 of the Plan. Each chapter provides detailed policies used to assess proposals for: employment and economic development; housing and community facilities and shopping and leisure developments. Policies Emp 4 – 7 relate to allocations in West Edinburgh, and so are addressed under Issue 20.

Planning authority's summary of the representation(s):

CONTEXT

The Main Issues Report chapter 5 consulted the public on issues relating to the strategic economic land supply and the meeting the needs of small businesses. The preferred option was taken forward in the Plan and represents a change from policies in the

Edinburgh City Local Plan.

The Main Issues Report Chapter 3 on Housing primarily consulted on the strategic approach to housing supply and new housing proposals. Question 8 of the Main Issues Report sought views on the policy on Houses in Multiple Occupancy. The preferred option was taken forward and the Plan does not contain a policy on Houses in Multiple Occupancy. The Main Issues Report proposed changes that could be taken with regards affordable housing policy.

The Main Issues Report Chapter 6 consulted on Shopping and Leisure and asked three questions in relation to new retail development and alternative uses of shop units in designated shopping centres and proposed the use of supplementary guidance. The preferred options were taken forward in the Plan. Further questions were asked of supermarket provision. Stakeholder workshops on retail policy took places during the consultation period of the Main Issues Report.

EMPLOYMENT POLICIES

Office Development

- In order to comply with Scottish Planning Policy's town centres first approach, Emp 1 should refer to town centres, and include a requirement for impact assessments for office developments over 2,500 sq m outwith town centres. **(2088 Scottish Government)**
- Amend the text in Policy Emp 1 to ensure that only essential office building is allowed and to address an apparent long term surplus of offices in the city. **(2126 Cockburn Association)**

Special Economic Areas – Edinburgh BioQuarter

- Amend the text in paragraph 194 to reflect finalised status of the BioQuarter Supplementary Guidance and to be consistent with the approach used in relation to other Special Employment Areas. **(2192 Edinburgh BioQuarter Partners)**
- Requests the Plan acknowledges that the University of Edinburgh is not a single site campus and policy should support the capital programme and developments across its estate which plays an important economic and employment role. **(2443 University of Edinburgh)**

Special Economic Areas – Riccarton University Campus and Business Park

- Amend the text in Policy Emp 3 as suggested to reflect the requirement for the university to deliver the type and range of facilities and uses necessary to compete in a modern international university environment and the hotel use reflects the requirement of the development of the National Performance Centre for Sport. **(0836 Heriot-Watt University)**

Other Economic and Employment Policies – Emp 8, 9, 10

- Lochend Industrial Estate does not have appropriate HGV access to the trunk road network and fails a principal test of being designated under Policy Emp 8. The Estate has a vibrant mix of uses not limited to the use classes stipulated under Policy Emp 8, however there is a poor marketing record and therefore it is

submitted that there is a requirement for employment sites which allow a wide range of business uses to operate from a west of Edinburgh location but that are not necessarily dependent on access to the trunk road network. **(2676 Flying Scot Parking (Edinburgh) Ltd)**

- Amend the text in Policy Emp 9 in order to clarify the need to prioritise residential use on future brownfield sites in support of the Council's assumption about the level of completions from this source of housing of housing land supply. **(2281 Wallace Land Investment and Management)**
- Amend text to policy Emp 9 to include an additional criterion: ‘c) the proposal is in or adjacent to a Conservation Area and would contribute to the aims of that designation. **(2719 Royal mail Group)**
- Amend the text in Policy Emp 10 by rewording criterion c): 'within the boundaries of the Heriot-Watt Campus in association with the requirement of the development of the National Performance Centre for Sport' in order to clarify that a hotel on campus is a requirement of the awarding of the National Performance Centre for Sport. **(0836 Heriot-Watt University)**
- There is no specific provision for car showrooms/servicing facilities in the plan which is an important economic activity. The plan should address the use in principle and identify Axis Park, Newbridge as an appropriate location for car showrooms/servicing facilities. **(2698 Prem Rooster Ltd)**

HOUSING POLICIES

General

- No specific modification is sought other than seeking recognition of the need to provide housing within the upper market range and in locations where there is an explicit demand. Site at Craigcrook Road could add range and choice in a desirable location where new housing is not available. **(1154 CALA Management Ltd)**
- No specific modification is sought other than concerned that the plan does not refer to the importance of small local playgrounds, and the severe lack of provision throughout parts of the city and this is not recognised in the housing policies. The plan should support and encourage small local playgrounds in both existing and new housing. **(2354 Grange/Prestonfield Community Council)**
- Amend the plan by adding a policy outlining the approach to the assessment of private rented sector development. To recognise the advantages of the private rented sector in meeting housing demand in Edinburgh. As with purpose built student accommodation, the provision of private rented sector will act to reduce the pressure on traditional family housing by providing for smaller households. The stance on affordable housing needs to be established. **(2677 Turley)**

Hou 1 Housing Development

- No specific modification requested but is unable to support Policy Hou 1 criterion a), c), d) and e) on the grounds of housing land requirements, proposals, development principles and unnecessary use of greenfield sites. **(2126 Cockburn Association)**
- Amend the list of allocated sites in Policy Hou 1 to include the sites west of Ravelrig Road, Balerno. This site would add to the supply of housing and help to meet the shortfall in housing. **(2276 Gladman Developments Ltd)**

- Amend the text in Policy Hou 1 criterion a) to include a new site HSG22a Burdiehouse Extension, to meet strategic housing needs. Amend Policy Hou 1 to require a Housing Land Supplementary Guidance to provide a mechanism to ensure that a five year effective housing land supply can be maintained. **(2279 Hallam Land Management Ltd)**
- Amend the text of Policy Hou 1 by adding an additional criterion: 'on other suitable sites beyond the urban area if the Council is not maintaining a five year effective housing supply at all times.' Amend the text in the supporting text: 'together with the guiding principles of sustainable development set out in Scottish Planning Policy paragraph 29.' In order to maintain a five year effective land supply and accord with SDP and Scottish Planning Policy. Other amendments required to Figure 7 and comments on the Housing Land Supply Study (June 2014) and completion rates. **(2281 Wallace Land Investment and Management)**
- No specific modification sought other than for Policy Hou 1 to clarify windfall development and 'other suitable sites' in criterion e) and concern that Hou 1 effectively places a policy moratorium on greenfield housing in Edinburgh. Considers that the plan does not make adequate provision for new housing and the reliance on high density yields from constrained brownfield housing (particularly the waterfront) is a risky strategy. Policy Hou 1 should make explicit reference to viability in relation to possible deviation from site briefs and development principles. **(2684 Homes for Scotland)**

Hou 2 Housing Mix

- Amend the text in Policy Hou 2 to add 'students' to ensure socially diverse and inclusive communities. **(1901 Stephen and Joan Carter)**
- Amend the text in Policy Hou 2 to include the word 'locations' after 'sizes'. Geography is an important element as well as size and tenure. A mix of housing should be provided in a range of locations. Development should not be restricted to the 13 strategic growth areas as this would stifle development elsewhere. **(2276 Gladman Developments Ltd)**
- No specific modification requested other than to seek greater consideration to how the plan can support the delivery of appropriate housing for the elderly, other than that in Hou 2. This is needed to meet the needs for specialist housing for the elderly. **(2713 McCarthy and Stone Retirement Lifestyle Ltd)**

Hou 3 Private Green Space in Housing Development

- Amend the text in Policy Hou 3 to ensure it applies to student housing and housing for the elderly. Excluding these groups runs counter to the aims of policy Des 5 b) which seeks to facilitate adaptability in the future to the needs of different occupiers. If it is recommended to continue a distinction between student/elderly and general housing, recommends a minimum acceptable area for greenspace (equivalent to the figure in Hou 3 a)). **(1901 Stephen and Joan Carter)**
- Amend the text of Policy Hou 3 to remove criterion b). In many instances it is possible to include sufficient on-site greenspace provision within developments. Planning obligations under Section 75 should not be used to require payments to resolve issues that could equally be resolved in another way. **(2276 Gladman Developments Ltd)**
- Amend the text in Policy Hou 3 by referring to high quality and, where appropriate, biodiverse greenspace, to accord with the Edinburgh Living Landscape partnership

and ensure that biodiversity is increased. **(2505 Scottish Wildlife Trust)**

- Amend the text in Policy Hou 3 to include greater flexibility and that consideration is given to the provision of internal communal facilities on spatially constrained sites. Meeting Policy Hou 3 standards is challenging when 30-35% gross internal floorspace is taken up with the provision of communal facilities. **(2713 McCarthy and Stone Retirement Lifestyle Ltd)**

Hou 4 Housing Density

- No specific modification requested other than to seek clarification on how Policy Hou 4 assesses locality specifically criterion c) and d). Policy Hou 4 should be amended to ensure clarity and certainty as to how planning applications would be assessed against requirement of Hou 4 d). Should not be a minimum or maximum density. Needs to be a clear understanding of what constitutes 'other relevant services' and as to how provision of local facilities can be measured and provided**. (2276 Gladman Developments Ltd)**
- Amend Policy Hou 4 to ensure the density of student housing is tested. **(1901 Stephen and Joan Carter)**

Hou 5 Conversion to Housing

- Amend the text in paragraph 215 of Policy Hou 5 to remove the comprehensive resistance to conversion of empty shops to housing and instead set out guidance to applicants and officers on the circumstances where reuse of empty shops would be supported. This could refer for example to where the shop unit has been vacant for over a defined period of time and been actively marketed, and where there is local need and demand for a range of housing types and town centre living in order to reflect the Town Centres Review. **(2088 Scottish Government)**

Hou 6 Affordable Housing

- Amend the text in Policy Hou 6 to ensure that affordable housing always be on site or in the near neighbourhood, possibly through the purchase of existing property by the Council and conversion to suit. Notes that the Council is currently short of affordable housing to the extent of 44%. **(1170 A J C Clark)**
- Amend the text in Policy Hou 6 to recognise a phased approach to development of large sites and the need to ensure the correct balance of affordable housing across the entire allocation. In certain phases of HSG 14 there is an overprovision of affordable housing, and policy should allow future phases to provide less so that full extent of affordable housing reached complies with Policy Hou 6 and Policy Hou 2. **(2536 Parc Craigmillar Ltd)**
- No specific modification requested other than to encourage the Council to not to seek affordable housing contributions from specialist accommodation for the elderly. In line with Scottish Planning Policy paragraph 132-134 where a contribution to affordable housing may not always be required. The viability of specialist accommodation is more finely balanced than general needs housing. **(2713 McCarthy and Stone Retirement Lifestyle Ltd)**
- Amend the text in Policy Hou 6 to make student housing developments obliged to pay for affordable housing. **(1901 Stephen and Joan Carter)**

Policy Hou 8 Student Accommodation

- Supports Policy Hou 8 criterion a) but has concern that criterion b) places a barrier to solving the shortage of student accommodation and that 'an excessive concentration of student accommodation' must be proportionate to the amount of students in the area. Seeks clarification on the concentration levels of student accommodation. **(2320 Edinburgh University Students' Association)**
- No specific modification requested other than to seek additional weight to be given to proposals for student residences where there is a direct relationship with existing higher education institutions. To reflect the importance of providing suitable residential accommodation to support the University's activities. The Plan should consider the wider regeneration of North Sighthill area. No specific modification requested other than to seek additional weight to be given to proposals for student residences where there is a direct relationship with existing higher education institutions. **(2317 Edinburgh Napier University)**
- Amend the wording of Policy Hou 8b) by adding to the end 'to the detriment of the character and amenity of the locality'. This will address the apparent rigidity of applying the prescribed 30% threshold on student accommodation concentration and ensures that opportunities to deliver purpose-built student accommodation in suitable locations are not missed. **(0748 S Harrison Developments Ltd)**
- Amend the wording of Policy Hou 8 and supporting paragraphs 221 and 222. The reasons for such changes stems from an appeal decision at Lutton Court (PPA-230-2122) and the uncertainty this raised over the interpretation of Policy Hou 10 in the Edinburgh City Local Plan. Criterion a) needs to be re-worded to make clear the purpose of the policy, which is to promote locations accessible to university and college facilities by any sustainable means of transport. Criterion b) needs to be amended to make clear that it is the total number of students being referred to in 'concentration', not just those in purpose built accommodation. Adding in new criterion c) would make clear that purpose built accommodation should also comply with a suite of relevant design and housing policies. Deleting reference to 'relatively high densities' in paragraph 221 is suggested as density can be controlled through other policies such as Policy Hou 4 or Des 4 and Des 5. Concerned that having a reference to high densities in Hou 8 gives the impression that all student accommodation can be built at high density. Considers that student accommodation should provide open space, which is why reference to 'significantly-less open space' should be deleted. Suggests rewording text on accessibility and transport to make clear that any location within a reasonable journey time by sustainable means of transport would be appropriate. Also considers that the reference to a mix of land use and housing types in paragraph 222 is not clear and should be removed. **(1901 Stephen and Joan Carter)**
- Revise Policy Hou 8 to include the 30% threshold of student accommodation. States that the Southside has a high percentage of student accommodation which is having a detrimental effect on the balance of the community. **(2172 Southside Association)**
- Amend Policy Hou 8 to encourage student housing in central Edinburgh close to the University Campuses. Suggest removing reference to concentration in any one area, as it is encouraging student residences close to the campuses which will inevitably result in greater numbers. This part of the policy should be replaced with a range of practical criteria which include the quality of the accommodation to be created in the proposed residence; the quality of the building and its contribution to place making; and the additional amenities in the student residence which will enhance the student living experience. States that the policy should be clearer on

its aim which is to free up traditional accommodation from student occupation. **(2271 Vita Edinburgh 1 Limited)**

- Requests a more liberal approach to student housing under Policy Hou 8, especially where universities encourage added managed accommodation close to campus. There should also be a reference to the emerging strength of the private rented sector housing market and the need to positively address the private rented sector. **(2290 Edinburgh Developers' Group (Edinburgh Chamber of Commerce))**
- Concerned that when the market for student accommodation is saturated there may be applications for change of use to normal housing without the provision for green space etc which would otherwise be required. Request a review of current policy be undertaken of the effectiveness of the Edinburgh City Local Plan Policy Hou 10 in managing the provision of student accommodation, so that the Plan can be adjusted if necessary. **(2354 Grange/Prestonfield Community Council)**
- Requests a review of the Student Housing planning guidance. States that the shortfall in the number of student bedspaces available for full time students needs to be met. It is considered that the proximity of purpose built student accommodation to university facilities should be the primary criterion in assessing the suitability of proposals for purpose built student accommodation. Suggests deleting criterion b) as it presumes an unnecessary and unjustifiable prejudice against a sector of the population that is not enshrined in land use planning and there is no evidence that a concentration of students is a negative issue. **(2440 Unite Group plc)**
- Requests substantial strengthening of Policy Hou 8. States that the current policy recently failed when an applicant successfully appealed a refusal of planning permission based solely on this policy. Suggests several ways in which the policy could be altered. **(2673 Sheila Gilmore MP)**

Matters covered by Student Housing Planning Guidance

- The definition of 'campus' needs to be amended to be buildings built and owned by the University, not part of the Southside community. Requests that in the Student Housing Guidance Map 1, Meadow Land and the south part of the University Campus is excluded. Considers also that 'adjacent' needs to be defined. **(0381 Jez Kempston)**
- Requests a review of the Student Housing planning guidance. States that the shortfall in the number of student bedspaces available for full time students needs to be met. **(2443 The University of Edinburgh)**
- Considers that it is impossible to maintain a balanced community in the Southside when student percentage occupation is at 50-60%. Family housing and sheltered housing is needed but cannot compete with student housing for sites. Requests that students living in Housing in Multiple Occupancy and other properties should be included in the student concentration threshold assessed by Policy Hou 8b). **(2657 Hilary McDowell)**
- Considers that the Student Housing guidance needs to be reviewed. States that the 30% restriction on purpose-built student housing in these designated localities prevents the Council from having the flexibility to address the persistent lack of safe and affordable housing for students in the city and should be replaced by a more flexible, balanced approach. Suggests specifying under Policy Hou 8 that the maximum proportion of students in a locality should be proportionate to the amount of students enrolled in local universities and/or colleges. **(2680 National Union of**

Students Scotland)

Housing in Multiple Occupancy

- The existing Housing in Multiple Occupancy policy limits concentrations in sensitive areas to a maximum of 30% in the Edinburgh City Local Plan and if moved to guidance may mean that any concern regarding over concentration is dismissed at the discretion of the Officer or Members. Suggests reintroducing a specific Housing in Multiple Occupancy policy into the Plan. The planning authority must work with the licensing authority to establish a joint approach to the Scottish Government regarding changes to the Housing (Scotland) Act 2006 (part 5) to allow the local authority to restrict further licenses on the basis of license concentrations in sensitive areas. **(2673 Sheila Gilmore MP)**

Hou 9 Sites for Gypsies, Travellers and Travelling Showpeople

- No specific modification sought other than to seek clarification on if the Council has quantified need and suggest that the Council identifies a site for Gypsies, Travellers and Travelling Showpeople. Policy Hou 9 should reflect SESplan Housing Needs and Demand Assessment 2 consultation paper, and quantify need by acquiring suitable sites to promote and manage a second camping facility (e.g. a portion of the Edinburgh Garden District). **(1170 A J C Clark)**
- Amend the text in Policy Hou 9 criterion a) to clarify the term 'needed'. Clarify the requirements of criterion a) as it may be ultra vires and may not conform to the Equalities Act. No Gypsy/Traveller household should have to prove that they require a private pitch in the Edinburgh area. **(2299 Forbes Marr)**
- Amend the text in paragraph 223 to cross refer to Env 10 and to the Housing Needs and Demand Assessment and Local Housing Strategy. To clarify that Gypsy/Traveller pitch sites are likely to be in the green belt/countryside and are uses that require a countryside location. **(2299 Forbes Marr)**

Hou 10 Community Facilities

- Amend the text in Policy Hou 10 to make specific reference to sport. This would reinforce the importance of sports facilities to local communities, and would complement Policy Env 19. Policy Env 19 protects playing fields from development, and reference to sport in Policy Hou 10 would demonstrate similar protection to indoor facilities such as local halls. **(0124 sportscotland)**
- Amend the text supporting Policy 10 to describe 'Community Facilities': 'community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community' and include the same as an entry in the Glossary for Community Facilities. For clarity and consistency and would obviate the need for examples. **(0241 Theatres Trust)**
- No specific modification requested other than to seek clarification on Hou 10 Community Facilities. Both health and care facilities and community facilities should be regarded as infrastructure actions that require developer contributions. Policy Hou 10 appears to apply to replacement of lost facilities and resources rather than provision of essential new infrastructure. **(0799 NHS Lothian Public Health & Health Policy)**
- Recommend a new policy on the town centres first approach. Alternatively Policy Hou 10: Community Facilities should be amended to reflect the locational town

centres first approach expected by Scottish Planning Policy. **(2088 Scottish Government)**

- No specific modification sought other than for the supporting text for Policy Hou 10 to acknowledge the limitations of the development process specifically in relation to the provision of healthcare facilities, which is a commercial matter for GPs and the health board. **(2276 Gladman Developments Ltd)**
- Amend the text in Policy Hou 10: 'Where there is an agreed need which is necessary, planning permission … community facilities, relative to the impact and scale of development proposed…' in order to meet the tests of paragraph 14 of Circular 3/2012. **(2281 Wallace Land Investment and Management)**
- Amend the text in Policy Hou 10 to include student housing explicitly as there can be a major impact from students on local community facilities e.g. GPs and dental services. **(1901 Stephen and Joan Carter)**

RETAIL POLICIES

City Centre Retail Core

- Amend the text in Policy Ret 1 criterion d) by deleting 'pedestrian'. The policy's intent should be to create a safe and attractive environment for all, and should consider all city centre users, not just pedestrians**. (2341 New Town & Broughton Community Council)**
- Amend paragraph 228 to include a restriction on 'A' boards as there are frequent objections to 'A' board use in the narrow pavements of the West End Village/ West Maitland Street and should be controlled when pedestrian movement is impeded. There has been opposition to large seating areas in historic streets where they are seen to diminish the character of the West End junction and George Street. Amend the text in criterion b) of Ret 1 to add 'and variety' after 'retail vitality'. Need to encourage spread of offer and promote boutique activity. Supports any opportunity to encourage the use of upper floors. **(2690 West End Community Council)**

Town Centres

- Amend the plan to include a new policy that explicitly and fully covers the town centres first approach as set out in Scottish Planning Policy. Policy Ret 1 is focussed on retail and does not convey the full range of uses set out in Scottish Planning Policy. Introducing a policy on town centres would give the plan more of a place focus rather than a topic based approach. The new policy should encourage a mix of uses in town centres to support their vibrancy, vitality and viability throughout the day and into the evening; cover the full set of town centre uses: 'uses which attract significant numbers of people, including retail and commercial leisure, offices, community and cultural facilities'; and set out the sequential approach. The supporting text should set out how the sequential approach will be applied flexibly and realistically to ensure that different uses are developed in the most appropriate locations. **(2088 Scottish Government)**
- Amend the text in Policy Ret 2 by adding a bullet point: 'the site is within comfortable and easy walking distance of its primary retail frontage' and remove the supporting text on town centre boundary changes. Concern raised about the removal of the requirement to be within easy walking distance of the town centre boundary. Suggests that if this is not the case development could still be approved. It implies that it is acceptable for people to access such a site by car, which would

be at odds with other references to the use of public transport elsewhere in the Plan. Concerned that changing boundaries through supplementary guidance could make it easier for edge or out of centre sites to be approved putting town centres at risk. **(1140 Diana Cairns)**

- Amend the text in Policy Ret 2 to delete 'or can form an effective extension to the centre'. Extensions that are beyond a close proximity should not be encouraged. It is not clear how supplementary guidance will be prepared or consulted on. **(2568 Stephen Hawkins)**

Commercial Centres

- Amend the text in Policy Ret 3 to delete 'and will be restricted to a scale which makes good this deficiency'. Considers that there is no justification for the text. It is not possible to say what scale of proposal will meet such a deficiency. Will become more irrelevant in future as retail sector changes. Test should be broad and accompanied by an impact assessment. **(0838 Gibraltar General Partner Ltd)**

Local Centres

- Amend the text in Policy Ret 4 to include criteria for advertisement control as large billboard hoardings are inappropriate in local shopping centres. Redraw the local centre boundary north of 2 Strachan Road to exclude possibility of large scale advertisement hoardings. **(0364 Craigleith/Blackhall Community Council)**

Out-of-Centre Development

- Amend the text in Policy Ret 5 a) to remove the word 'qualitative'. 'Quality' in retail is vague and open to interpretation and subjectivity which opens the door to retail over-provision. The word is inappropriate and superfluous and its use negates the point of the retail policy. **(1141 Fairmilehead Association)**

Entertainment and Leisure Uses

- Amend the text in Policies Ret 6 and Ret 7 to refer to all cultural facilities: 'Development involving the loss of valuable cultural or community facilities will not be allowed unless appropriate alternative provision is made.' Policies Ret 6 and Ret 7 refer to locations for future development. There is no policy for the protection and enhancement of existing cultural facilities. **(0241 Theatres Trust)**
- Amend the text in Policy Ret 7 criterion a) by adding 'or the attraction is based on a specific feature or location' in order to allow positive consideration of attractions based on a specific natural physical feature and which does not create unacceptable traffic or amenity issues and can be successfully integrated into its surroundings. **(0828 Network Rail; 2341 New Town & Broughton Community Council)**

Ret 8 Alternative Use of Shop Units

- Limit the types of commercial establishments (namely pubs, betting offices, saunas, tattoo centres) that are allowed in the Corstorphine Town Centre. **(0194 Corstorphine Community Council)**
- Amend the plan to retain primary retail frontages in town centres and reinstate

Edinburgh City Local Plan Policy Ret 9 criterion a). The removal of primary retail frontages could undermine the retail function of town centres. Concern raised that the removal of the requirement that no more than one third of frontage can be non retail allows town centres to continue to function as retail centres. Degeneration of town centres would mean loss of sustainability which would be against policies to encourage walking and cycling. There is no indication of how supplementary guidance would be developed. Considers that supplementary guidance is not policy so can be disregarded. **(1140 Diana Cairns)**

- Amend the text in Policy Ret 9 to delete criterion e). Considers it inappropriate to convert retail premises into residential use. Policy Ret 1 should promote a variety of retailers. Use Pentland View Court or site of former Currie Primary School to develop a vibrant central area. **(1170 A J C Clark)**
- Amend the Plan to include an explicit reference for the town centres supplementary guidance to include the spatial elements of town centre strategies based on town centre health checks. To ensure that supplementary guidance will be in line with Scottish Planning Policy paragraph 66 to include the spatial elements of town centre strategies. **(2088 Scottish Government)**
- Amend the text in Policy Ret 8 by replacing ‘and’ with ‘or’ between criterion a) and b); and in paragraph 246 amend wording to: 'The policy applies to ground floor units only or separate basement /first floor units that can be directly accessed from the pavement.' There are some non-retail uses that arguably contribute more to the vitality and footfall of the city centre. The wording of criterion b) is suitably subjective to allow appropriate consideration of uses. Alternatively delete criterion a) and apply criterion b) rigorously. Strengthen the use of standalone basements units. **(2341 New Town & Broughton Community Council)**
- Amend the text in paragraph 255 to include the west end of Rose Street/George Street as an identified sensitive area. Amend the Council's Guidance for Businesses to include this area as an area of oversupply of licensed premises, in line with a representation made to the ‘Revision of Statement to Licensing Policy’. **(2341 New Town & Broughton Community Council)**
- Amend the text in Policy Ret 8 by reinstating the criterion in the Edinburgh City Local Plan (one in three units in shop use within primary frontages of designated town centres). There is no evidence that the proposed policy offers stronger or equal protection to existing policy or that the policy change will contribute to the economic viability of designated town centres. Raises questions regarding supplementary guidance. **(2568 Stephen Hawkins)**
- Amend the text in Policy Ret 8 to allow changes from retail use to non-retail use along Shandwick Place; the criteria should not be left to supplementary guidance. Proposes other changes to supplementary guidance on shopping. Supplementary guidance should not inform the development plan. Supports even more flexibility in the Plan and supplementary guidance with the removal of the ‘four or more consecutive non-shop uses’ criterion. Supports the tailored approach to each town centre. **(2569 Town Centre Securities plc)**
- Welcomes the decision for a more flexible approach for non-retail uses, but Ret 8 should be more flexible and the criteria for assessment should be included in the Plan and not left for the supplementary guidance to provide the detail. The development plan should inform the supplementary guidance and the proposals map should define the core and primary frontages. Other detailed comments made on the Supplementary Guidance. **(2269 Essel Securities plc)**

Modifications sought by those submitting representations:

EMPLOYMENT POLICIES

Office Development

- Amend the text in Policy Emp 1 to include reference to town centres in line with the town centres first (sequential assessment) approach. Suggests revision to policy text and adding a requirement for town centre impact assessments for office developments over 2,500 sq m proposed outwith town centres and contrary to the development plan. **(2088 Scottish Government)**
- Amend the text in Policy Emp 1 to insert after 'Developments': 'that are demonstrated to be essential'. **(2126 Cockburn Association)**

Special Economic Areas – Edinburgh BioQuarter

- Amend the text in paragraph 194 to reflect finalised status of the BioQuarter Supplementary Guidance. Add to supporting text: 'The finalised Supplementary Guidance and the Development Principles were informed by the EBQ Masterplan which the council supports as non-statutory guidance for the Edinburgh BioQuarter.' **(2192 Edinburgh BioQuarter Partners)**
- Supports the identification of Edinburgh BioQuarter Emp 2 and its Development Principles. No specific modification requested other than that the Plan acknowledges that the University of Edinburgh is not a single site campus and policy should support the capital programme and developments across its estate which plays an important economic and employment role. **(2443 University of Edinburgh)**

Special Economic Areas – Riccarton University Campus and Business Park

- Amend the text in Policy Emp 3 by replacing 2) with: 'Uses ancillary to the University, including student and staff residential accommodation, sport and recreational facilities, hotel and conference facilities, local convenience and service outlets (up to 400 sq m), commercial leisure, and health care/crèche facilities.' Amend text in paragraph 195 by adding: 'This policy also supports the development of the National Performance Centre for Sport and directly related development.' **(0836 Heriot-Watt University)**

Other Economic and Employment Policies – Emp 8, 9, 10

- Amend the Plan to include Lochend Industrial Estate, employment uses to the south-east of the M9/Newbridge roundabout and accessed off Harvest Drive and Queen Anne Drive under Policy Emp 9 and remove from designation in the Proposals Map under Policy Emp 8. **(2676 Flying Scot Parking (Edinburgh) Ltd)**
- Amend the text in Policy Emp 9 by adding to end of criterion b): 'particularly where the Council is not maintaining a five year effective housing land supply at all times, residential development will be granted if the sustainability of the proposal accords with the guiding principles of sustainable development set out in Scottish Planning Policy paragraph 29.' **(2281 Wallace Land Investment and Management)**
- Amend text to Policy Emp 9 to include an additional criterion: ‘c) the proposal is in

or adjacent to a conservation area and would contribute to the aims of that designation. **(2719 Royal mail Group)**

- Amend the text in Policy Emp 10 by rewording criterion c): 'within the boundaries of the Heriot-Watt Campus in association with the requirement of the development of the National Performance Centre for Sport'. **(0836 Heriot-Watt University)**
- Amend the Plan to include a new policy for car showrooms/servicing facilities use and identify Axis Park, Newbridge as an appropriate location for car showrooms/servicing facilities. **(2698 Prem Rooster Ltd)**

HOUSING POLICIES

General

- No specific modification is sought other than seeking recognition of the need to provide housing within the upper market range and in locations where there is an explicit demand. **(1154 CALA Management Ltd)**
- No specific modification is sought other than concerned that the Plan does not refer to the importance of small local playgrounds, and the severe lack of provision throughout parts of the city and this is not recognised in the housing policies. The Plan should support and encourage small local playgrounds in both existing and new housing. **(2354 Grange/Prestonfield Community Council)**
- Amend the Plan by adding a policy outlining the approach to the assessment of private rented sector development. **(2677 Turley)**

Hou 1 Housing Development

- No specific modification requested but is unable to support Policy Hou 1 criterion a), c), d) and e) on the grounds of housing land requirements, proposals, development principles and unnecessary use of greenfield sites. **(2126 Cockburn Association)**
- Amend the list of allocated sites in Policy Hou 1 to include the sites west of Ravelrig Road, Balerno. **(2276 Gladman Developments Ltd)**
- Amend the text in Policy Hou 1 criterion a) to include a new site HSG 22a Burdiehouse Extension, and to require a Housing Land Supplementary Guidance. **(2279 Hallam Land Management Ltd)**
- Amend the text of Policy Hou 1 by adding an additional criterion: 'on other suitable sites beyond the urban area if the Council is not maintaining a 5 year effective housing supply at all times.' Amend the text in the supporting text: 'together with the guiding principles of sustainable development set out in Scottish Planning Policy paragraph 29.' **(2281 Wallace Land Investment and Management)**
- No specific modification sought other than for Policy Hou 1 to clarify windfall development and 'other suitable sites' in criterion e) and concern that Hou 1 effectively places a policy moratorium on greenfield housing in Edinburgh. Policy Hou 1 should make explicit reference to viability in relation to possible deviation from site briefs and development principles. **(2684 Homes for Scotland)**

Hou 2 Housing Mix

- Amend the text in Policy Hou 2 to add 'students' to ensure socially diverse and inclusive communities. **(1901 Stephen and Joan Carter)**
- Amend the text in Policy Hou 2 to include the word 'locations' after 'sizes'. **(2276**

Gladman Developments Ltd)

- No specific modification requested other than to seek greater consideration to how the Plan can support the delivery of appropriate housing for the elderly, other than that in Hou 2**. (2713 McCarthy and Stone Retirement Lifestyle Ltd)**

Hou 3 Private Green Space in Housing Development

- Amend the text in Policy Hou 3 / paragraph 213 to ensure it applies to student housing and housing for the elderly excluding these groups runs counter to the aims of Policy Des 5 b) which seeks to facilitate adaptability in the future to the needs of different occupiers. If it is recommended to continue a distinction between student/elderly and general housing, recommends a minimum acceptable area for greenspace (equivalent to the figure in Hou 3 a)).**(1901 Stephen and Joan Carter)**
- Amend the text of Policy Hou 3 to remove criterion b) unless it can be demonstrated that housing developments would result in a loss of open space within the locality which cannot be provided within the confines of the development. **(2276 Gladman Developments Ltd)**
- Amend the text in Policy Hou 3 by referring to high quality and, where appropriate, biodiverse greenspace. **(2505 Scottish Wildlife Trust)**
- Amend the text in Policy Hou 3 to include greater flexibility and that consideration is given to the provision of internal communal facilities on spatially constrained sites. **(2713 McCarthy and Stone Retirement Lifestyle Ltd)**

Hou 4 Housing Density

- No specific modification requested other than to seek clarification on how Policy Hou 4 assesses locality. **(2276 Gladman Developments Ltd)**
- Amend Policy Hou 4 to ensure the density of student housing is tested. **(1901 Stephen and Joan Carter)**

Hou 5 Conversion to Housing

- Amend the text in paragraph 215 of Policy Hou 5 to remove the comprehensive resistance to conversion of empty shops to housing and instead set out guidance to applicants and officers on the circumstances where reuse of empty shops would be supported. **(2088 Scottish Government)**

Hou 6 Affordable Housing

- Amend the text in Policy Hou 6 to ensure that affordable housing always be on site or in the near neighbourhood. **(1170 A J C Clark)**
- Amend the text in Policy Hou 6 to recognise a phased approach to development of large sites and the need to ensure the correct balance of affordable housing across the entire allocation. **(2536 Parc Craigmillar Ltd)**
- No specific modification requested other than to encourage the Council to not to seek affordable housing contributions from specialist accommodation for the elderly. **(2713 McCarthy and Stone Retirement Lifestyle Ltd)**
- Amend the text in Policy Hou 6 to make student housing obliged to pay for affordable housing. **(1901 Stephen and Joan Carter)**

Policy Hou 8 Student Accommodation

- Supports Policy Hou 8 criterion a) but has concern that criterion b) places a barrier to solving the shortage of student accommodation and that 'an excessive concentration of student accommodation' must be proportionate to the amount of students in the area. Seeks clarification on the concentration levels of student accommodation. **(2320 Edinburgh University Students' Association)**
- No specific modification requested other than to seek additional weight to be given to proposals for student residences where there is a direct relationship with existing higher education institutions. To reflect the importance of providing suitable residential accommodation to support the University's activities. The Plan should consider the wider regeneration of North Sighthill area. No specific modification requested other than to seek additional weight to be given to proposals for student residences where there is a direct relationship with existing higher education institutions. **(2317 Edinburgh Napier University)**
- Amend Policy Hou 8 b) by adding to the end 'to the detriment of the character and amenity of the locality'. **(0748 S Harrison Developments Ltd).**
- Amend the wording of Policy Hou 8 by deleting 'public transport' in criterion a) and adding 'by walking, cycling or public transport' after 'facilities'. In criterion b), amend the policy by deleting 'accommodation'. Add a new criterion c) which states 'The proposal complies with all other relevant plan policies including but not exclusively Policies Des 1, Des 4, Des 5, Hou 2, Hou 3, Hou 4, Hou 6 and Hou 10.' Amend paragraph 221 by taking out references to high density and open space. It will instead read 'Such housing requires significantly less car parking, although some provision may still be required'. In paragraph 222 replace 'close to' with 'accessible to'; after colleges add 'without the need for private car ownership and excessive journey times'; delete 'and accessible by public transport', delete 'accommodation' and 'nature of the locality in terms of mix of land use and housing types, the'. **(1901 Stephen and Joan Carter)**
- Revise Policy Hou 8 to include the 30% threshold of student accommodation. **(2172 Southside Association)**
- Amend Policy Hou 8 to encourage student housing in central Edinburgh close to the University Campuses. Suggest removing reference to concentration in any one area, as it is encouraging student residences close to the campuses which will inevitably result in greater numbers. Replace the criteria with reference to build quality, placemaking and additional amenities. States that the policy should be clearer on its aim which is to free up traditional accommodation from student occupation. **(2271 Vita Edinburgh 1 Limited)**
- No specific modifications proposed. However, does consider that a more liberal approach to student housing in Policy Hou 8 is required and reference is needed to the strength of the private rented sector. **(2290 Edinburgh Developers' Group (Edinburgh Chamber of Commerce))**
- Request a review of current policy. **(2354 Grange/Prestonfield Community Council)**
- Suggests amending the supporting text for Policy Hou 8 to recognise the need for purpose built student housing. Delete criterion b) of Policy Hou 8 and replace with 'Planning permission will be granted for purpose built student accommodation where the location is appropriate in terms of access to public transport and university and college facilities'. **(2440 Unite Group plc)**
- Requests substantial strengthening of Policy Hou 8. Suggests that alterations to the policy could include incorporating the 30% limit into the policy wording;

prohibiting planning permission in certain areas where the population has already exceeded 30% with those datazones listed in the Plan; or listing preferred datazones where student accommodation would be acceptable and is desirable. Consider also that the policy should be strengthened to further ensure developers are committed to making contributions to support the delivery of local services and amenities and affordable housing. **(2673 Sheila Gilmore MP)**

Matters covered by Student Housing Planning Guidance

- The definition of 'campus' needs to be amended to be buildings built and owned by the University, not part of the Southside community. Requests that in the Student Housing Guidance Map 1, Meadow Land and the south part of the University Campus is excluded. Considers that 'adjacent' also needs to be defined. **(0381 Jez Kempston)**
- Requests a review of the Student Housing planning guidance. States that the shortfall in the number of student bedspaces available for full time students needs to be met. **(2443 The University of Edinburgh)**
- Requests that students living in Housing in Multiple Occupancy and other properties should be included in the student concentration threshold assessed by Policy Hou 8b). **(2657 Hilary McDowell)**
- Considers that the Student Housing guidance needs to be reviewed. **(2680 National Union of Students Scotland)**

Housing in Multiple Occupancy

- Suggests reintroducing a specific Housing in Multiple Occupancy policy into the Plan. **(2673 Sheila Gilmore MP)**

Hou 9 Sites for Gypsies, Travellers and Travelling Showpeople

- No specific modification sought other than to seek clarification on if the Council has quantified need and suggest that the Council identifies a site for Gypsies, Travellers and Travelling Showpeople. **(1170 A J C Clark)**
- Amend the text in Policy Hou 9 criterion a) to clarify the term 'needed'. **(2299 Forbes Marr)**
- Amend the text in paragraph 223 to cross refer to Env 10 and to the Housing Needs and Demand Assessment and Local Housing Strategy. To clarify that Gypsy/Traveller pitch sites are likely to be in the green belt/countryside and are uses that require a countryside location. **(2299 Forbes Marr)**

Hou 10 Community Facilities

- Amend the text in Policy Hou 10 to make specific reference to sport. **(0124 sportscotland)**
- Amend the text supporting Policy Hou 10 to describe 'Community Facilities': 'community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community' and include the same as an entry in the Glossary for Community Facilities. **(0241 Theatres Trust)**
- No specific modification requested other than to seek clarification on Policy Hou 10 Community Facilities and to reiterate the importance of complying with Scottish Housing Quality Standards for any new build or conversion in paragraph 207.

(0799 NHS Lothian Public Health & Health Policy)

- Recommend a new policy on the town centres first approach. Alternatively Policy Hou 10: Community Facilities should be amended to reflect the locational town centres first approach expected by Scottish Planning Policy. **(2088 Scottish Government)**
- No specific modification sought other than for the supporting text for Policy Hou 10 to acknowledge that the provision of healthcare facilities is not specifically a matter for developers. **(2276 Gladman Developments Ltd)**
- Amend the text in Policy Hou 10: 'Where there is an agreed need which is necessary, planning permission … community facilities, relative to the impact and scale of development proposed…' **(2281 Wallace Land Investment and Management)**
- Amend the text in Policy Hou 10 to include student housing explicitly as there can be a major impact from students on local community facilities e.g. GPs and dental services. **(1901 Stephen and Joan Carter)**

RETAIL POLICIES

Policy Ret 1 – City Centre Retail Core

- Amend the text in Ret 1 criterion d) by deleting 'pedestrian' **(2341 New Town & Broughton Community Council)**
- Amend paragraph 228 to include a restriction on 'A' boards and large outdoor seating areas. **(2690 West End Community Council)**
- Amend the text in criterion b) of Policy Ret 1 to add 'and variety' after 'retail vitality' to promote a variety of retailers. **(2690 West End Community Council; 1170 A J C Clark)**

Policy Ret 2 – Town Centres

- Amend the Plan to include a new policy that explicitly and fully covers the town centres first approach as set out in Scottish Planning Policy. **(2088 Scottish Government)**
- Amend the text in Policy Ret 2 by deleting 'or can form an effective extension to the centre' and replacing with: 'the site is within comfortable and easy walking distance of its primary retail frontage.' **(1140 Diana Cairns; 2568 Stephen Hawkins)**
- Amend the text by deleting: 'The boundaries of each centre … Boundary changes may be recommended through the preparation of supplementary guidance' in supporting paragraph 230. **(1140 Diana Cairns)**

Policy Ret 3 – Commercial Centres

- Amend the text in Policy Ret 3 to delete 'and will be restricted to a scale which makes good this deficiency'. **(0838 Gibraltar General Partner Ltd)**

Policy Ret 4 – Local Centres

- Amend the text in Policy Ret 4 to include criteria for advertisement control. Redraw the local centre boundary north of 2 Strachan Road to exclude possibility of large scale advertisement hoardings. **(364 Craigleith/Blackhall Community Council)**

Policy Ret 5 – Out-of-Centre Development

- Amend the text in Policy Ret 5 a) to remove the word 'qualitative'. **(1141 Fairmilehead Association)**

Policies Ret 6 and 7 – Entertainment and Leisure Uses

- Amend the text in Policies Ret 6 and Ret 7 to refer to all cultural facilities: 'Development involving the loss of valuable cultural or community facilities will not be allowed unless appropriate alternative provision is made.' **(0241 Theatres Trust)**
- Amend the text in Policy Ret 7 criterion a) by adding 'or the attraction is based on a specific feature or location'. **(0828 Network Rail)**
- Amend the text in paragraph 255 to include the west end of Rose Street/George Street as an identified sensitive area. **(2341 New Town & Broughton Community Council)**

Policy Ret 8 Alternative Use of Shop Units

- Limit the types of commercial establishments (namely pubs, betting offices, saunas, tattoo centres) that are allowed in the Corstorphine Town Centre. **(0194 Corstorphine Community Council)**
- Amend the Plan to retain primary retail frontages in town centres and reinstate Edinburgh City Local Plan Policy Ret 9 a) 'As a result of permitting change of use, no more than one third of the total number of units in the frontage will be in non shop use'. **(1140 Diana Cairns)**
- Amend the text in Policy Ret 9 to delete criterion e). Considers it inappropriate to convert retail premises into residential use. Use Pentland View Court or site of former Currie Primary School to develop a vibrant central area. **(1170 A J C Clark)**
- Amend the Plan to include an explicit reference for the town centres supplementary guidance to include the spatial elements of town centre strategies based on town centre health checks. **(2088 Scottish Government)**
- Amend the text in Policy Ret 8 by replacing 'and' with 'or' between criterion a) and b); and in paragraph 246 amend wording to: 'The policy applies to ground floor units only or separate basement /first floor units that can be directly accessed from the pavement.' **(2341 New Town & Broughton Community Council)**
- Amend the text in paragraph 255 to include the west end of Rose Street/George Street as an identified sensitive area. Amend the Council's Guidance for Businesses to include this area as an area of oversupply of licensed premises, in line with a representation made to the 'Revision of Statement to Licensing Policy'. **(2341 New Town & Broughton Community Council)**
- Amend the text in Policy Ret 8 by reinstating the criteria in the Edinburgh City Local Plan (one in three units in shop use within primary frontages of designated town centres). **(2568 Stephen Hawkins)**
- Amend the text in Policy Ret 8 to allow changes from retail use to non-retail use along Shandwick Place; the criteria should not be left to supplementary guidance. Proposes other changes to supplementary guidance on shopping. **(2569 Town Centre Securities plc)**
- Ret 8 should be more flexible and the criteria for assessment should be included in the Plan. Allow each unit to be assessed on its own merits taking into consideration the context. **(2269 Essel Securities plc)**

Summary of responses (including reasons) by planning authority:

EMPLOYMENT POLICIES

Office Development

- *The changes sought to office policy* requiring town centre impact assessments for office developments over 2,500 sq m proposed outwith town centres and contrary to the development plan *would introduce scope for large out-of-centre office development in inappropriate locations not currently allowed by Policy Emp 1. This represents a major change to policy with potential impacts on development and investor confidence in the office locations identified in the Plan. Edinburgh's strategy for the sustainable location for office development is set out in Policy Emp 1 Office Development and are identified on the Proposals Map in Figure 6. Any change to this approach represents a major change to planning policy in Edinburgh which should be aired with the development community and local communities. This should be done as part of a Main Issues Report consultation, so that all stakeholders can have a say on how best to meet the aims of Scottish Planning Policy in the Edinburgh context. That approach would be in line with the advice in Circular* 6/2013 paragraphs 65 - 72*. The Main Issues Report did identify office and town centre policies as main issues, and engagement events were held to discuss these (see* Main Issues Report Questions 10 and 12-14, Office Supply and Demand Seminar summary March 2011; and Retail Workshop summary*). These informed the LDP resulting in policies best suited to Edinburgh and with broad support from developers and local communities.*

  Criterion c) and paragraph 192 set out the approach to other appropriate locations for office proposals. No modification proposed, however, the Council sees merit in making explicit reference to town centres in paragraph 192, using the following wording: 'To meet economic growth objectives, the plan applies a flexible approach to office proposals in other mixed use locations across the city, including town centres.' **(2088 Scottish Government)**
- The Council in preparing the Plan has confirmed that demand for high quality new office development is set to continue. The office take up in Edinburgh is regularly reviewed (see Development Activity Bulletins e.g. Office Development Schedule 2013, published May 2014 and the Office Demand in Edinburgh Draft Report April 2013). The supply of office space was an issue consulted on at the Main Issues Report stage (see Question 10). Introducing an essential need test would be contrary to Scottish Planning Policy in favour of sustainable development. No modification proposed. **(2126 Cockburn Association)**

Special Economic Areas – Edinburgh BioQuarter

- The current wording is accurate as the supplementary guidance has not yet been adopted by the Council and will not be until after the LDP is adopted. No modification proposed. **(2192 Edinburgh BioQuarter Partners)**
- There are no land use implications associated with this request and there is no justification for planning policy to reflect a single institution's capital programme. No modification proposed. **(2443 University of Edinburgh)**

Special Economic Areas – Riccarton University Campus and Business Park

- No modification proposed, however the Council sees merit in the addition of a reference to support for the National Performance Centre for Sport in paragraph 195. The other changes sought refer to uses which can be assessed using the relevant policies of the Plan. **(0836 Heriot-Watt University)**

Other Economic and Employment Policies – Emp 8, 9, 10

- There is no justification for the proposed wording in Policy Emp 9 which seeks support for residential development in line with Scottish Planning Policy. Criteria for housing development are provided by Policy Hou 1. The aim of Policy Emp 9 is to provide flexibility for the redevelopment of certain sites, provided that they meet the criteria set out in a) – c). Adding a general statement on housing land supply is not relevant to the purpose of the policy. No modification proposed. **(2281 Wallace Land Investment and Management)**
- Criteria for assessing development proposals in or adjacent to a conservation area is provided in Policies Env 5 and Env 6. There is no justification for including criteria regarding conservation areas in Policy Emp 9 as this would be introduce repetition to the Plan. No modification proposed. **(2719 Royal Mail Group)**
- The Heriot-Watt campus is now part of the urban area. Policy Emp 10 criterion c) therefore potentially supports hotel development on sites with suitable public transport accessibility. **(0836 Heriot-Watt University)**
- Proposals for the development of a car showroom/servicing facilities can be assessed against existing policies in the Plan, there is no justification for a policy specific to this use. There is business and industry land designated at Newbridge, where such uses are typically considered compatible. No modification proposed. **(2698 Prem Rooster Ltd)**
- There is no justification to remove Lochend Industrial Estate as a business and industry area designated under Policy Ret 8. Ancillary uses to support businesses can be supported as an exception to the policy and there are no specific access requirements, paragraph 202 states that most are in locations which can be easily accessed by heavy goods vehicles. No proposed modification. **(2676 Flying Scot Parking (Edinburgh) Ltd)**

HOUSING POLICIES

General

- There is no justification to make separate reference to the 'upper market range' as this is not an identified specific group such as gypsies, gypsy travellers or travelling showpeople. There is demand for housing across all income groups and tenures throughout the city and city region, and it is not appropriate for the Plan to single out one 'desirable' area of the city. The modification sought with regard to including a site at Craigcrook Road is dealt with under Issue 17. No modification proposed. **(1154 CALA Management Ltd)**
- Paragraph 212 refers to the standards set in the Open Space Strategy. These include the Play Space Access Standard in Chapter 8. Policies Hou 2 and Env 18 seek to ensure provision of access to play space in accordance with this standard. No modification proposed. **(2354 Grange/Prestonfield Community Council)**
- Housing development is in use class terms either Class 9 Houses or sui generis

flatted housing. There is no distinction in land use with regards to tenure. The Plan's policies therefore apply to all housing proposals. No modification proposed. **(2677 Turley)**

Hou 1 Housing Development

- Comments noted. Modifications sought are dealt with under other issues. **(2126 Cockburn Association)**
- The modification sought relates to a separate representation seeking allocation of a site which is dealt with in Issue 16. No modification proposed. **(2276 Gladman Developments Ltd)**
- The modification sought relates to a separate representation seeking allocation of a site which is dealt with in Issue 14. Reference to a LDP-level supplementary guidance document relating to land supply is unnecessary. The LDP allocates a generous supply of land as explained under Issue 5. Paragraphs 64 & 65 of the LDP address the five-year effective housing land supply issue. No modification proposed. **(2279 Hallam Land Management Ltd)**
- Policy Hou 1 is identified in the Proposals Map key as applying within the urban areas. SDP Policy 7 will be used to assess sites outwith the urban area in the relevant circumstances, as explained in paragraph 65. No modification proposed. **(2281 Wallace Land Investment and Management)**
- The Plan makes large amounts of greenfield land available for housing development. The SDP (paragraph 113) and Scottish Planning Policy (paragraph 40) prioritise brownfield development. The inclusion of site briefs and development principles in the Plan and their reference in policy is consistent with Scottish Planning Policy on placemaking (e.g. paragraphs 39 and 56). No modification proposed. **(2684 Homes for Scotland)**

Hou 2 Housing Mix

- Students are a population group whose specialist housing needs are dealt with in a separate Policy Hou 8 Student Accommodation. No modification proposed. **(1901 Stephen and Joan Carter)**
- The criteria for assessing the suitability of sites in terms of their location are dealt with in Policy Hou 1. Policy Hou 2 provides criteria specific to the aims of achieving a good mix of dwelling types and sizes to meet the needs of different population groups. No modification proposed. **(2276 Gladman Developments Ltd)**
- Policy Hou 2 recognises that some population groups such as the elderly may require specific housing types, in order to help achieve more mixed communities. For the Plan to include more specific requirements for the elderly in its policies would not be appropriate and the particular requirements for proposals are best assessed on a site by site basis, using Policy Hou 2 and other design and housing policies. No modification proposed. **(2713 McCarthy and Stone Retirement Lifestyle Ltd)**

Hou 3 Private Green Space in Housing Development

- The Plan's recognition that purpose-built accommodation for students and old people has different requirements from mainstream housing was established with the adoption of the Edinburgh City Local Plan. No monitoring evidence has been provided to justify a change. No modification proposed **(1901 Stephen and Joan**

Carter)

- Criterion b) of Policy Hou 3 ensures that all opportunities to add to and connect with the wider greenspace network are taken. Paragraphs 211 and 212 make clear that this should normally be through on-site provision and only exceptionally through financial contributions. This should be done taking into account the scale of development, regardless of whether there is a net loss of open space in the locality. No modification proposed. **(2276 Gladman Developments Ltd)**
- Policy Des 3 Development Design, Part 2 Section 2 of the Plan, states that where practicable, proposals should provide new habitat to further the conservation of biodiversity. More detailed guidance on private greenspace in housing development is set out in the Edinburgh Design Guidance. No modification proposed. **(2505 Scottish Wildlife Trust)**
- Policy Hou 3 applies to all mainstream housing. Paragraph 213 in the supporting text it clarifies that it does not apply to housing built for the occupation by students or the elderly. The provision for greenspace will be negotiated based on the anticipated needs of future residents. No modification proposed. **(2713 McCarthy and Stone Retirement Lifestyle Ltd)**

Hou 4 Housing Density

- The locality of any given development, its 'surrounding area' that is taken into account when assessing a development proposal is likely to be proportionate to the scale of development. No modification proposed. **(2276 Gladman Developments Ltd)**
- All development proposals should take into account site characteristics, location and public transport provision, and Policy Hou 4 applies to all development. However, the density of student housing is also dealt with in Policy Hou 8 Student Accommodation. No modification proposed. **(1901 Stephen and Joan Carter)**

Hou 5 Conversion to Housing

- The conversion of shop units to housing is resisted in the Plan in defined centres (Policy Hou 5 criterion d), paragraph 215 and Policy Ret 9) in order to safeguard these units for uses such as small business use or shop use to meet local needs. This aims to ensure that there is local shop provision within walking distance of all homes. Keeping shop units in shop use or an appropriate commercial, community or business use retains these units in an activity that supports the vitality of the town and local centres. Shop units are defined as having direct access off the pavement. Housing use would undermine the retailing function of the town and local centres by creating dead frontages at street level. The change sought does not take into account the Edinburgh area's relatively good performance in terms of town centre and local centre vacancy rates as evidenced in the Monitoring Statement *pages 42-43*. It also does not take into account the fact that all of Edinburgh's town centres and many of its local centres are tenemental with concentrated and growing residential populations which provide custom for local commercial uses.

  The Council sought views on proposed changes to policy for town centres and local centres in the Main Issues Report, Questions 13, 14 and 17 (see also pages 64-71). These resulted in Policy Ret 8 and the early preparation of dedicated supplementary guidance documents for each town centre. These changes seek to manage change within town and local centres without losing units to residential

use, most likely permanently.

The modification sought would represent a major policy change for defined centres which should be aired with local communities during a Main Issues Report consultation. *That approach would be in line with the advice in Circular* 6/2013 paragraphs 65 - 72*.*

For shop units outwith defined centres, it is considered that the criteria in Ret 9 – Alternative Use of Shop Units in Other Locations provide appropriate assessment criteria for the reuse of empty shop units, including conversion to housing. The Council's non-statutory Guidance for Business provides the relevant design and amenity considerations.

No modification proposed. **(2088 Scottish Government)**

Hou 6 Affordable Housing

- The key aim of the policy is that affordable housing is integrated with market housing on the same site. However, the policy also recognises that there are some circumstances, for example sites of less than 20 units, where an alternative provision may be acceptable. In the interests of flexibility, the policy allows for off-site provision in such exceptional circumstances. More guidance is provided in planning guidance. No modification proposed. **(1170 A J C Clark)**
- The wording of Policy Hou 6 is unchanged from the equivalent policy in the adopted Edinburgh City Local Plan. It applies to all housing development, including that designed and marketed for the older people, as the Housing Need and Demand Assessment has identified a significant affordable element of need for that demographic group. Purpose-built student accommodation is a residential institution use in planning terms and so was excluded from the Housing Need and Demand Assessment which identified the affordable housing need. The policy's application in practical terms is explained in non-statutory guidance. Particular phasing needs are considered on a case-by-case basis. No modification proposed. **(1901 Stephen and Joan Carter; 2536 Parc Craigmillar Ltd; 2713 McCarthy and Stone Retirement Lifestyle Ltd)**

Policy Hou 8 Student Accommodation

- 'Excessive concentration' in criteria b) of Policy Hou 8 is assessed using the methodology set out in the Council's non-statutory Student Housing Planning Guidance. The guidance, which sets a 30% concentration threshold, is currently under review. Policy Hou 8 is largely unchanged from the Edinburgh City Local Plan. This policy arose from the Report of Inquiry for the Edinburgh City Local Plan (pages 3-80 to 3-84). The Monitoring Statement stated that there was no need to change the policy. No modifications proposed. **(2320 Edinburgh University Students' Association).**
- It is not considered necessary or appropriate to add additional weight to proposals for student residences where there is a direct relationship with existing higher education institutions. With regards to the area of Sighthill, this is identified as an area of regeneration in Figure 1 of the Plan. No modification proposed. **(2317 Edinburgh Napier University)**
- The 'character and amenity of the locality' can be assessed using the design policies in Part 2 Section 2 of the Plan. It is also considered that the suggested

change to Policy Hou8 would be more appropriately considered through the review of the student housing guidance. No modification proposed **(0748 S Harrison Developments Ltd).**

- No modifications proposed, however, the Council sees merit in amending criteria a) to read 'The location is appropriate in terms of access to university and college facilities by walking, cycling or public transport'. It is considered that this rewording adds clarity to the policy.
  The word 'accommodation' is important in criterion b) as accommodation refers to all types of accommodation including purpose-built and private rented sector. Accommodation is the land use the policy is seeking to manage. No modifications proposed.

  It is not necessary to add a new criterion which refers to other relevant plan policies. Policy Hou 8 and associated planning guidance is not applied in isolation and consideration is given to site characteristics and other matters addressed in the Plan such as design, conservation and parking. No modifications proposed.

  It is appropriate to retain references to high density and open space in paragraph 221 because by nature, it is different to general housing. As mentioned previously, Policy Hou 8 is not applied in isolation and consideration is given to site characteristics and other matters addressed in the Plan. No modifications proposed.

  It is not reasonable, however, to add 'close to' or 'without the need for private car ownership and excessive journey times' after 'development should be close to the universities and colleges' or delete 'and accessible by public transport'. Private car ownership and excessive journey times are not planning matters. Criterion a) supports development in locations accessible by public transport. No modifications proposed

  Policy Hou 8 is largely unchanged from the Edinburgh City Local Plan. This policy emerged from the consideration set out in the Report of Inquiry for the Edinburgh City Local Plan (pages 3-80 to 3-84). The Monitoring Statement demonstrated that there was no need to change the policy. No modification proposed. **(1901 Stephen and Joan Carter).**
- The 30% threshold is more appropriate to be included in the planning guidance not the policy wording. There may be locations where a concentration exceeding 30% is appropriate and not deemed excessive. In this regard, retaining it in non-statutory guidance, allows the Council to apply some flexibility to the policy. **(2172 Southside Association).**
- The Council's approach to purpose-built student accommodation is to consider whether there is an issue of student concentration in particular locations.

  Policy Hou 8a) encourages student housing in locations close to public transport and University and College facilities. Criterion b) assesses whether the proposal will result in an excessive concentration. The non-statutory planning guidance sets out the locational guidance, which supports the principle of further student housing in and adjacent to main campuses, but sets a 30% threshold in other locations with good access to university and college facilities by public transport or by walking or cycling. By including a criterion which assesses concentration, it enables a balanced population to be achieved. Policy Hou 8 and associated planning guidance is not applied in isolation and consideration is given to site characteristics

and other matters addressed in the local plan such as design, conservation and parking. It is, therefore, not appropriate to replace criterion b) with a criterion which deals only with the quality of the building and its contribution to placemaking.

Paragraph 221 of the Plan states that 'it is preferable in principle that student needs are met as far as possible in purpose-built and managed schemes rather than widespread conversion of family housing.'
Policy Hou 8 is largely unchanged from the Edinburgh City Local Plan. This policy arose from the Report of Inquiry for the Edinburgh City Local Plan (pages 3-80 to 3-84). The Monitoring Statement stated that there was no need to change the policy. No modification proposed. **(2271 Vita Edinburgh 1 Limited).**

- No specific modifications proposed. Policy Hou 8a) supports locations which are appropriate in terms of access to both public transport and university and college facilities. The non-statutory Planning Guidance sets out the locational guidance, which supports the principle of further student housing in and adjacent to main campuses, but sets a 30% threshold in other locations with good access to university and college facilities by public transport or by walking or cycling. By including a criterion which assesses concentration, it enables a balanced population to be achieved. It is not relevant to make reference to the emerging strength of the private rented sector housing market and the need to positively address the Private Rented Sector. No modification proposed. **(2290 Edinburgh Developers' Group (Edinburgh Chamber of Commerce))**
- A review of Policy Hou 10 in the Edinburgh City Local Plan has been carried out. This is set out in the Monitoring Statement. The Student Housing Planning Guidance is currently under review. Policy Hou 8 is largely unchanged from the Edinburgh City Local Plan. This policy arose from the Report of Inquiry for the Edinburgh City Local Plan (pages 3-80 to 3-84). The Monitoring Statement stated that there was no need to change the policy. No modification proposed. **(2354 Grange/Prestonfield Community Council)**
- The Student Housing Planning Guidance is currently under review. The supporting text makes reference to the importance of purpose-built student accommodation. Paragraph 221 states that 'Increasing the amount of purpose built student accommodation assists the growth of the universities and the attractiveness of the city as a centre for Higher Education'. Additional information on the need for purpose-built student housing is more appropriately considered through the review of the student housing guidance.

  The proximity of purpose-built student accommodation to university facilities is set out in criterion a). It is considered that criterion b) should be retained in Policy Hou 8. By consistently applying a numerical approach, which requires the inclusion of information relating to general housing and student bedspaces, it has enabled a large proportion of much needed general housing to be secured on some of the larger sites. In doing so, it has acted as a tool in promoting balanced and mixed communities, which is a planning matter. No modification proposed. **(2440 Unite Group plc)**
- No specific modifications proposed but make some suggestions to how the policy may be strengthened. The Council does not agree that the policy should incorporate the 30% limit into its wording, because the 30% threshold is more appropriate to be included in the planning guidance. There may be locations where a concentration exceeding 30% is appropriate and not deemed excessive. In this regard, retaining it in non-statutory guidance, allows the Council to apply some flexibility to the policy. The planning guidance is currently under review. The other

suggested amendments are more appropriately dealt with in the review of the planning guidance. Student housing cannot deliver the much needed affordable housing.

Policy Hou 8 is largely unchanged from the Edinburgh City Local Plan. This policy arose from the Report of Inquiry for the Edinburgh City Local Plan (pages 3-80 to 3-84). The Monitoring Statement indicates that there is no need to change the policy. No modification proposed. **(2673 Sheila Gilmore MP)**

Matters covered by Student Housing Planning Guidance

- This representation is making reference to content in the planning guidance, which is outwith the scope of the Plan. The suggested change is more appropriately considered through the review of the Student Housing Planning Guidance. An Issues Paper for consultation was approved at Planning Committee in December 2014. No modification proposed. **(0381 Jez Kempston)**
- This representation is making reference to content in the planning guidance, which is outwith the scope of the Plan. The Student Housing Planning Guidance is currently under review. An Issues Paper for consultation was approved at Planning Committee in December 2014. No modification proposed. **(2443 The University of Edinburgh)**
- The suggested change to Policy Hou8 and the concentration calculation method would be more appropriately considered through the review of the student housing guidance. No modification proposed. **(2657 Hilary McDowell)**
- The 2010 Student Housing Planning Guidance is currently under review. An Issues Paper for consultation was approved at Planning Committee in December 2014. The suggested changes to Policy Hou8 would be more appropriately considered through the review of the student housing guidance. No modification proposed. **(2680 National Union of Students Scotland)**

Housing in Multiple Occupation

- As planning permission is only legally required for a change of use from any dwelling to accommodation comprising six unrelated persons or more, Edinburgh City Local Plan Policy Hou 9 is only applicable for large Houses in Multiple Occupancy. For that reason, and as set out on pages 16 and 17 of the LDP Monitoring Statement (2011), that specific Housing in Multiple Occupancy planning policy is having negligible effect in controlling the concentration of Housing in Multiple Occupancy. Main Issues Report Question 8 sought views on the Council's proposal to omit the policy on that basis. This received general support. For this reason, it is not proposed that a specific Housing in Multiple Occupancy policy is re-introduced. Policy Hou 7 is considered appropriate to consider the impact of proposals on residential amenity arising from the small number of large Housing in Multiple Occupancy which need to apply for planning permission. No modification proposed. **(2673 Sheila Gilmore MP)**

Hou 9 Sites for Gypsies, Travellers and Travelling Showpeople

- Policy Hou 9 is identified on the Proposals Map key as applying across the entire Plan area. This is to allow the potential location of a site in the green belt or countryside policy area. The policy wording and geographical scope is taken from the adopted Edinburgh City Local Plan. Identification of need is carried out in the

Housing Needs and Demand Assessment. No modification proposed. **(1170 A J C Clark; 2299 Forbes Marr)**

Hou 10 Community Facilities

- Protection of outdoor sporting facilities is addressed by Policies 18 and 19. Protection of indoor sporting facilities is a matter for the service provision strategies for the relevant organisations which provide those facilities, as is the provision of new sporting facilities. No modification proposed. **(0124 sportscotland)**
- The wording of Policy Hou 10 is taken from the adopted Edinburgh City Local Plan. No monitoring evidence has been provided to justify a change. No modification proposed. **(0241 Theatres Trust)**
- Policy Hou 10 seeks provision of new community facilities in its first sentence. No modification proposed. **(0799 NHS Lothian Public Health & Health Policy)**
- There is no justification for a new or any amendment to Policy Hou 10 to reflect the town centres first approach: this policy aims to support the integration of community facilities in new housing developments, and resist the loss of facilities with proven value if threatened by redevelopment proposals. Policy Ret 6 Entertainment and Leisure Developments – Preferred Locations provides a sequential approach to the location of these developments, and town centres are a preferred location. Policy Ret 8 Alternative Use of Shop Units in Defined Centres in Part 2 Section 6 recognises that a wide range of service, leisure and community uses support the retailing function of town and local centres. No modification proposed. **(2088 Scottish Government)**
- It is not considered necessary to acknowledge that the provision of healthcare facilities in not specifically a matter for developers. The Council will continue to work with its partners in the Edinburgh Community Health Partnership to ensure provision is planned for in new housing development, for example through site brief and development principles, and assessing proposals against this policy. No modification proposed. **(2276 Gladman Developments Ltd)**
- The wording of Policy Hou 10 is taken from the adopted Edinburgh City Local Plan. No monitoring evidence has been provided to justify a change. Growth allocations set out in the Plan have been discussed with the Edinburgh Community Health Partnership. This work has taken account of known student housing developments. No specific actions have been identified for inclusion in the Action Programme at this time. Should specific actions be identified these will be detailed in future iterations of the Action Programme. Any contributions from development will be subject to the relevant tests, as covered in Issue 21. No modification proposed. **(2281 Wallace Land Investment and Management; 1901 Stephen and Joan Carter)**

RETAIL POLICIES

Policy Ret 1 - City Centre Retail Core

- This policy will assess proposals for retail development in the City Centre Retail Core and criterion d) promotes the ease of movement for pedestrians for example by creating routes between streets through shops. This policy cannot influence the wider street use. Other transport policies and strategies promote cycling in the City Centre. No modification proposed. **(2341 New Town & Broughton Community**

Council)

- Detailed requests such as including a restriction on 'A' boards and large outdoor seating areas is outwith the scope of the policy on retail development in the city centre. These are issues to be addressed in the Council's public realm strategy and streetscape strategy. No modification proposed. **(2690 West End Community Council)**
- Planning policy cannot influence the type of shop to get a variety of shop types other than through those areas designated as speciality shopping streets. Retail vitality on the other hand is about ensuring a balance of uses that are likely to attract a high footfall in the City Centre Retail Core. No modification proposed. **(2690 West End Community Council; 1170 A J C Clark)**

Policy Ret 2 - Town Centres

- The Plan's policies Ret 1 – 5 and Figure 8 Shopping Centres in Part 1 of the Plan clearly set out the approach to the network of centres with the town centres as the preferred location for retail development. Including a single policy to set out the town centres approach would introduce repetition and loss of clarity in the Plan's land use policies, which impacts on its usefulness to prospective applicants and communities. No modification proposed, however the Council sees merit in including a reference that indicates where the Plan implements Scottish Planning Policy's town centre first policy. The following wording could be added at the end of either or both paragraphs 79 and 225: 'This approach intends to implement Scottish Planning Policy's town centre first principle'. **(2088 Scottish Government)**
- Policy Ret 2 the clause 'form an effective extension to the centre' better describes how new development should relate to the existing centre than 'within easy walking distance'. It encompasses how new proposed development will function, add to, improve probability of linked trips, impact on the existing town centre. No modification proposed. **(1140 Diana Cairns; 2568 Stephen Hawkins)**
- Town centre boundary changes should only occur through local development plan preparation. However in preparing and consulting on supplementary guidance on town centres, recommendation to boundary changes can be made which will inform the next plan and can be a subject for consultation in the plan's Main Issues Report stage. This approach maximises the public consultation on any boundary change. Examples of finalised supplementary guidance documents are available for several town centres. No modification proposed. **(1140 Diana Cairns)**

Policy Ret 3 – Commercial Centres

- Criterion a) of Policy Ret 3 is critical to ensuring that new retail development in commercial centres does not adversely impact on the wider shopping network. The plan's general approach (as set out in paragraph 77) is to restrict the further growth of the commercial centres. This was raised in the Main Issues Report in Question 12. This policy and this criterion in particular allows for some growth where specifically justified, and this criterion controls the amount of growth. No modification proposed. **(0838 Gibraltar General Partner Ltd)**

Policy Ret 4 – Local Centres

- There is no justification to redraw the boundary for identifying local centres unless

for sound reasons regarding its shopping function. Proposals for advertisement hoardings are assessed through development management using legislation on the control of advertisements. No modification proposed. **(0364 Craigleith/Blackhall Community Council)**

Policy Ret 5 - Out-of-Centre Development

- It is a requirement of Scottish Planning Policy (paragraph 73) to proposals for out of centres locations should help meet qualitative and quantitative deficiencies. No modification proposed. **(1141 Fairmilehead Association)**

Policies Ret 6 and 7 - Entertainment and Leisure Uses

- Policies Ret 6 and 7 seek to support the cultural sector in the city by providing a positive policy framework for new proposals. There is no evidence to justify a separate policy to protect cultural facilities in Edinburgh's context. No modification proposed. **(0241 Theatres Trust)**
- The current wording of Policy Ret 7 is taken from the adopted Edinburgh City Local Plan. No monitoring evidence has been provided to justify a change. The proposed wording change would provide additional support to out of centre developments and is not consistent with the enhanced emphasis given to location in town centres in Scottish Planning Policy. No modification proposed. **(0828 Network Rail).**
- Sensitive areas are defined in the Guidance for Business non statutory guidance. This has its own separate processes for review and consultation responses. No modification proposed. **(2341 New Town & Broughton Community Council)**

Policy Ret 8 - Alternative Use of Shop Units in Defined Centres

- There is no policy justification to have a blanket restriction on some types of uses within a town centre. The balance of uses for each town centre is instead determined in Supplementary Guidance, informed by public consultation. The Corstorphine Town Centre Supplementary Guidance was finalised following consultation in August 2014. No modification proposed. **(0194 Corstorphine Community Council)**
- The Main Issues Report in Question 14 explained the Council's proposed change in approach to this issue. It was considered that applying the same numerical restriction on changes of use for all the town centres was an inappropriate one-size-fits-all approach. Instead other ways of balancing the uses of shop units will be determined in a tailored approach through statutory supplementary guidance. No modification proposed. **(1140 Diana Cairns; 2568 Stephen Hawkins)**
- Policy Ret 9 provides criteria for assessing proposals for alternative use of shop units in locations not defined in the Plan. The conversion to residential use is only acceptable where there is no justification to keep the unit in shop use to meet local needs. Guidance for Business provides further design and amenity criteria for such conversions. No modification proposed. **(1170 A J C Clark)**
- Figure 8 of the Plan shows the spatial distribution of Edinburgh's Shopping Network. This is adequate and it would be inappropriate to seek to identify new local centres, other than those identified in the Plan. No modification proposed. **(1170 A J C Clark)**
- Figure 8 of the Plan shows the spatial distribution of Edinburgh's Shopping

Network. The supplementary guidance being prepared for each of the town centres includes policies on the change of use of shop units which are expressed using a map-based/spatial approach. The supplementary guidance documents take account of local circumstances and available evidence, including the Council's Town Centres Strategy (2013). No modification proposed. **(2088 Scottish Government)**

- Criterion a) and b) of Policy Ret 8 apply to local centres only, and so would not apply to town centres including the city centre. They seek to allow commercial and community uses, recognising the benefits they can bring alongside retail uses. However, they continue to apply a limit on such uses, to reserve some retail function in local centres. The Glossary definition of 'shop units' has been written to encompass basement units which are accessed directly from the street. Policy for change of use in town centres is set in separate supplementary guidance, which is consulted on separately and can take a different form to criterion a) and b) in Policy Ret 8. No modification proposed. **(2341 New Town & Broughton Community Council)**
- The areas identified in paragraph 255 are those where there is both a significant concentration of residential properties and of relevant late night uses. The part of the First New Town referred to has a relatively low concentration of residential uses. No modification proposed, however it is acknowledged that the non-statutory Guidance for Businesses is expected to be monitored and updated on a more frequent basis that the Plan, and that the text in paragraph 255 could be made more open-ended, to allow future editions of the guidance to identify further areas of sensitivity. **(2341 New Town & Broughton Community Council)**
- The finalised supplementary guidance for the City Centre Retail Core (February 2014) covers Shandwick Place and Castle Street. It sets out policy criteria to manage change of use of shop units in its area. That policy framework has been informed by consideration of available evidence, and by consultation responses. If changing circumstances justify a change in its policy framework that can be identified through the monitoring and updating of the supplementary guidance. No modification proposed. **(2569 Town Centre Securities plc; 2269 Essel Securities plc)**

Reporter's conclusions:

Office Development

1. Scottish Planning Policy (SPP) paragraph 60 requires the application of a town centre first policy when planning for uses which attract significant numbers of people, including retail and commercial leisure, offices, community and cultural facilities.

2. Paragraph 68 states that "Development plans should adopt a sequential town centre first approach when planning for uses which generate significant footfall, including retail and commercial leisure uses, offices, community and cultural facilities and, where appropriate, other public buildings such as libraries, and education and healthcare facilities. This requires that locations are considered in the following order of preference:

• town centres (including city centres and local centres);
• edge of town centre;
• other commercial centres identified in the development plan; and
• out-of-centre locations that are, or can be, made easily accessible by a choice of

transport modes.

3. SPP Paragraph 71 states that – "Where development proposals in edge of town centre, commercial centre or out-of-town locations are contrary to the development plan, it is for applicants to demonstrate that more central options have been thoroughly assessed and that the impact on existing town centres is acceptable. Where a new public building or office with a gross floor-space over 2,500 square metres is proposed outwith a town centre, and is contrary to the development plan, an assessment of the impact on the town centre should be carried out."

4. The strategic business centres are an intrinsic part of the development plan strategy. I do not consider that location here should require an impact assessment given that this would be consistent with the plan's locational strategy. I consider the requirement for assessment should only apply where the proposal is outwith: the city centre, the identified strategic office locations or another town centre as identified in table 6 on the proposals map. In this context, my recommended change to this policy reflects that proposed in the Scottish Government's representation with some slight amendment to clarify that the requirement for assessment only applies outwith city centres, other strategic business centres or town centres.

5. Promoting sustainable economic growth is a key objective of the National Planning Framework and Scottish Planning Policy. I consider the plan should support the continued growth of Edinburgh as a business and commercial centre. Office space will be required to facilitate this. The application of criteria to assess whether a new office was essential would be difficult to define and unnecessarily restrictive.

6. Whilst there may be vacant office space and an apparent surplus, needs change over time and a range and choice of provision is required. I do not consider that it would be appropriate for the proposed plan to seek to control office development as proposed in this representation. This might restrict the opportunities for future investment and employment growth. I note the concern about what might happen to redundant office buildings not suited to current use. However, Policy Emp 9 provides a framework for consideration of alternative uses of such buildings. My conclusion is that no change is required to address the matters raised by the Cockburn Association.

Special Economic Areas – Edinburgh BioQuarter (EBQ)

7. Paragraph 194 states that supplementary guidance will be prepared to support the future development of the site. There is no specific reference to the EBQ masterplan or its function as non-statutory guidance. The policy reference to Supplementary Guidance leads me to assume this is to be statutory guidance which once approved would carry the weight of section 25 of the Act. This is clarified in paragraph 9 of the plan. However, this is subject to a separate process and further consultation. Such guidance is not within the remit of the examination but I consider there may be scope for the guidance to reflect some, if not most, of the detail currently included in the masterplan.

8. Whilst I do not consider it would be appropriate to reference a master-plan, which may have moved on, I am content that the emphasis of the policy is on supporting proposals in accordance with the development principles. Any subsequent guidance needs to be appropriately referenced. However, I consider that it is inappropriate for the policy to require compliance with yet to be approved guidance which will be subject to the due process of consultation and approval by Ministers. In this context, I consider the

emphasis of the policy wording should be changed to reflect the correct balance of considerations and the context within which future Supplementary Guidance should be prepared. This would correctly reflect the reference in Part 1 Section 5 that more detailed development principles are to be set out in Supplementary Guidance for the Edinburgh Bioquarter. My recommendation reflects this.

9. I appreciate that the location of the hospital, medical school and university within the city combine to support the proposed use of this site. However, as this is an employment allocation, to support life sciences and related commercial research, I consider that it would be inappropriate to refer specifically to the university. The policy is specific to the site rather than the wider contribution of the university which operates in a number of other locations throughout the city. My conclusion is that no change is required to reference the university across its whole estate.

Special Economic Areas – Riccarton University Campus and Business Park

10. It is not possible or appropriate for development plan policies to cover every eventuality. In this context, I consider that it is sufficient that Policy Emp 3 refers to uses ancillary to the university. This leaves some discretion to assess proposals which may arise without seeking to include a large list of uses which may in any event require assessment against the other relevant policies of the plan.

11. The policy refers specifically to residential accommodation and to sport and recreational facilities. I consider this approach is consistent with the policy objectives and the aim of keeping development plan policies as succinct and concise as possible. Paragraph 195 gives some further explanation to the policy and I agree with the council and the university that this section could appropriately reference the National Performance Centre for Sport. Additional reference to directly related development would provide a supportive context within which ancillary facilities such as a hotel could be assessed. My recommendation reflects this conclusion.

Other Economic and Employment Policies – Emp 8, 9, 10

12. I agree with the council that it is important to retain a range of employment sites across the city including business and industry areas. Representation on Lochend Industrial Estate points to the different character of this area as it does not have good Heavy Goods Access to the trunk road network and has a mix of uses not limited to the use classes stipulated under Policy Emp 8. Reference to a poor marketing record suggests the need for flexibility to consider a wide range of business uses to operate from a west of Edinburgh location.

13. I accept that some dilution of uses has occurred at Lochend and access may not compare as favourably to other sites. However, paragraph 202 clarifies that goods access for Heavy Good Vehicles is not a pre-requisite by reference to “most” in terms of such access. Some flexibility is applied through reference in paragraph 202 to exceptions for ancillary uses which support local businesses and provide services for their employees. Given that the area remains characterised by a range of employment uses I consider it is appropriately retained as a “Business and Industrial Area”.

14. I understand that the council anticipates a significant contribution from windfall housing sites and that these may include sites currently in employment use. However, the focus of this section of the plan is on employment provision. Redevelopment is

supported whilst seeking to support small business premises within any larger redevelopment schemes. In this context, I find no justification for a specific reference to housing development as this is covered by other polices, specifically Policy Hou 1 (see below and Issue 5).

15. I note that Polices Env 5 and Env 6 are relevant to the consideration of proposals within conservation areas. The plan should be read as a whole and I consider these policies provide an appropriate context without the need for repetition in Policy Emp 9. This is specifically related to proposals to redevelop employment sites and premises. As far as the post office premises referenced in this representation I do not consider that location outwith a defined regeneration area would exclude consideration of re-use. This is a general criteria which also references improvement of the wider area. I see no reason why this consideration would not extend to premises within or adjacent to a conservation area.

16. My conclusions above support the addition of a specific reference to the National Performance Centre for Sport in Policy Emp 3. I have no reason to doubt that a hotel on site is a prerequisite for this award. However, the site is within the urban area and there is scope for such a proposal to be considered under the terms of Policy Emp10. I consider this is sufficient without the need for an additional location specific reference.

17. I note the council's reference to the compatibility of car showroom use at Newbridge with designation for business and industry. The supporting text refers to small- scale proposals for ancillary uses which support local businesses and provide services for their employees. I do not consider it appropriate or necessary to make specific reference to car showrooms at Axis Park, Newhouse given that the focus of this policy is on business and industrial areas in general and on their retention in employment use.

Housing Policies

General

18. I note the supporting documentation provided by CALA Management Limited in support of a site at Craigcrook Road. These matters are addressed through Issue 17**.** I do not consider it would be appropriate to make reference to a particular market sector as the plan is seeking to cater for the full range of housing needs. I cover issues relating to affordable housing below. Whilst I recognise the importance of the private rented sector land use planning makes no distinction in relation to tenure. Policy Hou 3 relates to green space provision and paragraph 212 clarifies the role of the council's Open Space Strategy. As this sets out standards for play space in new development I consider this matter is sufficiently covered. Consequently, I do not recommend any changes in response to these general matters.

Hou 1 Housing Development

19. Site specific issues are dealt with under the relevant schedule 4 specifically Issues 14 and 16.

20. I note the council's response that Hou 1 is intended to apply only within the urban area. However I consider that this results in a lack of a clear policy to apply to sites outwith this area. In addition, it does not allow for the local translation of SESplan Policy 7 which reflects the difficulties of providing an effective land supply and securing

completions in accordance with the strategic land requirement. From my conclusion in Issue 5 there is a clear deficiency in the anticipated programming of the housing land supply particularly in the first five years. This makes the local application of Policy 7 a particularly important consideration. For this reason my recommendations include a revised Policy Hou 1. Given my conclusions on Issue 5 this reflects the emphasis that will be required to secure delivery of the identified land supply and adds a requirement to demonstrate the effectiveness of the site. I consider an additional criteria on sustainability is also justified to reflect Scottish Planning Policy objectives.

21. Representation from Galdman Developments suggest the council should prepare Supplementary Guidance to set out the mechanism through which a five year land supply will be maintained at all times. However, I consider that Hou 1 is sufficient in its own right to clarify the mechanism through which a five year land supply will be maintained at all times.

22. On the matter of deviation from site briefs and development principles my conclusions and recommendations on Issues 5 and 21 recognise that financial viability issues will be important if delivery is to be secured. This is addressed through recommended revision to Policy Del 1 and its associated Supplementary Guidance (see Issue 21). This guidance will be subject to further consultation including with the development industry. With these changes I do not consider that this matter need be specifically referenced in Policy Hou 1. I note concern regarding the realisation of high density yields in the water-front area and on other brownfield sites. However the anticipated densities are expressed as estimates and generally include a range. I find this enables sufficient flexibility at this stage in the planning process.

Hou 2 Housing Mix

23. I consider that it is sufficient that Hou 2 addresses a mix of house types and sizes to meet the full range of housing needs as there is a separate Policy Hou 8 which deals specifically with student accommodation.

24. My reading of this policy is that it applies to the mix of housing within areas and sites rather than to the geographical spread of that provision. The objective is to achieve more socially diverse and inclusive communities. In this respect I consider the existing policy wording is sufficient.

25. I agree that appropriate provision for the elderly is an important consideration. This is referenced in Policy Hou 2 and reflected in the objective of meeting the needs of different population groups. Delivery is likely to rely on a range of mechanisms including available funding, other housing specific policies applied through the council's housing strategy and on co-operation between the private sector and social housing providers.

26. The provision of whole life housing which is reflected in Policy Des 5b and the requirements of the building regulations should also help to ensure that new housing is more suitable and adaptable to meet a range of housing needs. Consequently, I am satisfied that the policy is sufficient in establishing such provision as an objective within the council's land use plan.

Hou 3 Private Green Space in Housing Development

27. Whilst I appreciate the desire to secure adaptability within the housing stock (as

reflected in Policy Des 5b) there is likely to continue to be demand for purpose built provision of accommodation for the elderly and for students. In these circumstances I consider the council's approach, in seeking to tailor the nature of green space provision in accordance with the needs of these groups, is a sensible one. This need not negate the need for appropriate open space access or provision but enables such provision to be tailored to specific circumstances. Consequently, my conclusion is that it is appropriate to apply some limited exceptions to this policy to reflect specific housing types.

28. My understanding of the policy is that part a) recognises circumstances where, in the absence of private gardens, communal green space provision should be sought for at least (20%) of the site. In other circumstances where the development is for housing with private gardens a percentage is not applied. However, account will be taken of linkage with the existing green network and the provisions of the open space strategy to determine any wider contribution whether on or off-site through a commensurate contribution. I consider this is satisfactorily explained through supporting paragraphs 211 and 212. I consider it is appropriate to seek an appropriate contribution to publically accessible space and connection with the wider network enhancement in the interests of amenity and access. Consequently, I do not consider that criteria b) should be removed.

29. I consider the issues of quality and biodiversity enhancement are sufficiently covered elsewhere in the plan specifically through Policies Des 1 and Des 3.

30. Paragraph 213 of the proposed plan applies appropriate flexibility in recognising the needs of particular groups such as students and the elderly. This would enable factors such as internal communal space to be considered and for a tailored approach to specific developments. My conclusion is that no change is required.

Hou 4 Housing Density

31. I appreciate the desire to have a more precise definition as to how criterion c) and d) are to be assessed. However there are various approaches to assessing accessibility such as the walking distance from bus, tram or train stops, connectivity to the cycle network, proximity to employment and higher order services.

32. These concepts are generally well understood and in the interests of brevity and a concise plan I find no reason to rehearse these in detail through this policy. However, I accept that some clarification would be helpful and that the reference to other relevant services could be further clarified. I propose that the emphasis should be placed on accessibility including access to public transport so that it also covers walking and cycling as well as proximity to services and facilities. My recommendation reflects this.

33. Criteria d) simply expresses the fact that a higher density should support the provision of the necessary local facilities. The policy does not reference a minimum or maximum density but rather an appropriate density.

34. My reading of Policy Hou 4 on housing density is that this would also apply to student housing as this is a general policy which applies to all housing. However, it should be read alongside Policy Hou 8 which accepts that student housing can take place at relatively high density and requires significantly less car parking and open space than family housing. In my opinion, the design based principles of Policy Hou 4 would remain relevant to the consideration of student housing. In this respect I do not consider it is necessary to include a specific reference to any particular form of housing in this policy.

Hou 5 Conversion to Housing

35. Paragraph 215 accepts the role of conversion of commercial buildings in contributing to housing provision and enabling the sustainable re-use of otherwise redundant premises. I accept that the same could apply to shops but I also recognise the important objective of maintaining the shop units in defined centres, speciality streets and other locations as this contributes to the vitality of the city. In this context my recommended change to paragraph 215 accepts that appropriate re-use for housing may be preferable to long term vacancy. However given the council's view that a restrictive policy approach has worked in the particular circumstances of Edinburgh as it has a vibrant city centre retail core and town centres I have placed this flexibility in the context of Policies Ret 8 and 9. Read together this flexibility is then most relevant in the context of Policy Ret 9 where residential use is specifically referenced. I consider it is appropriate to include reference to circumstances where the shop unit has been vacant for over a significant period of time and been actively marketed, where there is local need and to demand for a range of housing types and town centre living. My recommendation reflects this.

Hou 6 Affordable Housing

36. I appreciate the significant need to deliver affordable housing in the city as evidenced through the housing needs and demand assessment. In this respect, I consider that Policy Hou 6 with its requirement for 25% provision on sites of more than 12 units and on larger sites, where on site provision will normally be required, is unlikely to meet the full scale of these needs. However Scottish Planning in paragraph 129 states that the benchmark figure is that each site should contribute 25% of the total number of housing units as affordable housing. This approach reflects the statement in paragraph 129 that policies on affordable housing provision should be realistic and take into account considerations such as development viability and the availability of funding.

37. I do not consider that a higher percentage or an absolute requirement for on-site delivery would be appropriate or realistic in the current economic circumstances. This does not prevent higher percentages of affordable housing being delivered where grant funding is available or where provision may be enabled through a social housing provider. My conclusion is that the policy appropriately reflects Scottish Planning Policy and that a higher percentage requirement would not be justified.

38. For Policy Hou 4 above I conclude that the relevant design principles could be applied to student accommodation. For affordable housing the council distinguishes between housing and residential use as defined in the use classes order. However, this can be a matter of scale and degree and will depend on the extent to which students are living independently of each other. Some purpose built accommodation for students is made up of independent flats with limited use of shared facilities and may differ little from other city centre flats or key worker accommodation.

39. In any event provision of affordable housing on site is likely to be inappropriate and economic viability assumptions are likely to presume against the requirement for an off-site contribution. The provision of tailored student accommodation may have a role in freeing up other flatted and affordable housing stock on the housing market. For these reasons, I do not consider it would be appropriate to apply this policy to purpose built student accommodation.

40. I recognise the need for affordable housing in the city as reflected in the Housing

Need and Demand Assessment. Policy Hou 6 states that provision of affordable housing should normally be on site. The text in paragraph 218 clarifies that provision on an alternative site may be acceptable where the housing proposal is less than 20 units or there are other exceptional circumstances.

41. PAN2/2010 Affordable Housing and Housing Land Audits recognises that it may not always be possible to deliver on site and that in some cases provision could be made on another site or through a commuted payment. Paragraph 21 of the advice note explains that a site may be unsuitable for affordable housing for a variety of reasons, including the size of the site, location, topography, conversion of buildings where relevant standards cannot be met and other local circumstances such as whether an appropriate tenure mix can be delivered. I consider Policy Hou 6 correctly places the emphasis on site provision but that it is appropriate to enable some flexibility in certain limited circumstances. My conclusion is that no change is required.

42. I do not have specific information on the relevant mix of housing proposed on site HSG 14 at Niddrie Mains but note it is a large site which will be developed in phases and that future proposals should accord with the Craigmillar Urban Design Framework. Policy Hou 6 refers to 25% contribution based on the total number of units proposed. The key objective is to secure a full range of housing including integration of affordable and market housing. An over-emphasis on one type of housing is unlikely to fulfil this objective and it may be that future phases can redress this balance. However, that is not to say that an appropriate contribution would not be sought from subsequent developers even if this was to be directed elsewhere. This is a general policy and cannot respond to every circumstance but I consider that it provides an appropriate framework for individual circumstances to be assessed on their own merits. My conclusion is that no change is required.

43. On the matter of contributions to affordable housing from specialist accommodation providers I note the reference in Scottish Planning Policy paragraph 129. It states that where planning permission is sought for specialist housing a contribution may not always be required. The council refers to the affordable housing needs of the elderly and I consider this is a relevant consideration but that its application should be tailored accordingly depending on the nature of the specialist housing being proposed and economic viability considerations. My conclusion is that wording to highlight the potential for exceptions to apply to specialist housing should be included. My recommendation reflects this.

Policy Hou 8 Student Accommodation

44. The guidance referenced in this policy and the council's intentions for its future review fall outwith the scope of this examination. I understand the current guidance may have led to a specific detailed policy approach including use of a 30% threshold. This has been used as a guide to the concept of excessive concentration. This threshold was only applied to locations which were not within or adjacent to main campuses. However my focus is on the actual terms of Policy Hou 8 and its supporting text which contain no reference to a threshold or to the application of a more detailed locational approach.

45. There may be a role for additional guidance but this should be firmly based in the terms of the policy. Policy Hou 8 provides the local development plan policy on student accommodation and does not define a "campus" or any specific locations. Further guidance is proposed through paragraph 222 but I note this is not referenced as

Supplementary Guidance. To be included as such the guidance would have to be appropriately referenced and based on the principles established in the plan. The guidance referred to is not a matter for this examination and in considering future proposals, Policy Hou 8 as part of the development plan, would carry the greatest weight.

46. The policy recognises the benefits of purpose built student accommodation as it does not result in the loss of general needs housing stock and can generally take place at relatively high densities. Criteria a) directs such development to locations accessible to public transport and to university and college facilities. I consider this serves a clear planning purpose in that it reduces the need to travel other than by walking, cycling or public transport. I consider this could be further clarified by better definition of what is required to secure access to university and college facilities. The council's suggested wording provides a helpful addition in this respect - 'The location is appropriate in terms of access to university and college facilities by walking, cycling or public transport' . My recommendation reflects this.

47. With this change I consider the planning objective to secure locations accessible to higher education facilities is sufficiently covered. It would be difficult to define "direct relationship" or the planning objective behind such a requirement. Specific reference to Sighthill would not fit with the more general nature of this policy in applying to all student accommodation. Consequently, I do not consider any change is required in these respects.

48. In relation to criteria b) Paragraph 222 of the proposed plan takes account of the nature of the locality. Whilst purpose built accommodation is preferred this is only supported in appropriate locations. It would not be appropriate to refer to specific localities or streets in this more general policy. I have no evidence on the application of an appropriate percentage threshold or how this might be applied. I consider there may be locations where a concentration exceeding 30% would not be excessive.

49. I consider that the interpretation of excessive would fall to be considered on the merits of any particular proposal.

50. In this respect I consider that it would be helpful if the policy wording in "bold" better reflected the considerations set out in the supporting text so that it is clear what the planning objectives is in seeking to avoid an "excessive concentration". To reflect this conclusion, I recommend additional wording in b) to reference the maintenance of balanced communities and the avoidance of detrimental impacts on the character and amenity of the area.

51. I note the use of 'accommodation' and the council's interpretation of this to apply to all student accommodation including that in the private rented sector and not just that which is purpose built. I consider a small change here to specifically reference the private rented sector would avoid any future ambiguity in this respect. My recommendation reflects this.

52. I have addressed the requests for specific references to student accommodation within other housing policies elsewhere in this issue under the relevant policy reference. In this respect I do not consider it necessary to include a cross-reference to Policy Hou 8 as the plan should be read as a whole. I find that my proposed changes are sufficient to address the required clarification of this policy as referenced in relation to appeal decision (PPA-230-2122) and the concerns expressed by the Southside Association.

53. Given that this policy is concerned with purpose built accommodation I am not persuaded that there should also be a specific reference to the emerging strength of the private rented sector housing market and the need to positively address this.

54. I recognise that it is important to make appropriate provision for student accommodation and some locations by their nature are better placed to accommodate a particularly high concentration of students. That is why I do not consider it would be appropriate to apply a percentage threshold through the development plan. This enables flexibility to apply a realistic interpretation based on the established character of the area.

55. I appreciate concerns about reference to higher densities, less car parking and open space and accept that student accommodation should not be to the detriment of the character and amenity of the area. I consider the final sentence of paragraph 221 could be clarified to avoid any potential to establish a mixed message. Replacement with a more general sentence which should not imply that design considerations should be set aside would address these concerns. With these changes I do not consider that further cross referencing or changes to the wording in paragraphs 221 and 222 is appropriate or necessary.

56. As for any type of development there is an expectation that the market will take account of the sustainability of the use as part of any investment decision. Representations to this plan highlight a continued demand for such accommodation and I have no evidence of any anticipated saturation of the market. This policy cannot cover every eventuality and if such a situation should occur then any applications for change of use of these building to mainstream or other types of residential provision would be assessed on their merits with regard to other relevant policies in the plan. Consequently, my conclusion is that no change is required to address this specific matter.

Housing in Multiple Occupancy

57. Policy Hou 9 of the Edinburgh City Local Plan was deleted as its influence was limited to larger premises of 6 people or more. The planning system has no control on the use of flats and other premises where less than 6 people are sharing. The objective of any policy should reflect matters which fall within the remit of planning. In this case such influence is restricted to changes of use which require planning permission. This could apply equally to an HMO as another use. The planning objective is to ensure that such proposals do not have an unacceptable impact on the living conditions of nearby residents. I consider that these matters are sufficiently addressed through Policy Hou 7 on inappropriate uses in residential areas.

Hou 9 Sites for Gypsies, Travellers and Travelling Show-people

58. Scottish Planning Policy paragraph 133 references the specific housing needs of Gypsies and Travellers. The needs of all Gypsies and Travellers for appropriate accommodation should be considered through the housing needs and demand assessment and the local housing strategy. Planning authorities should identify suitable locations for meeting the needs of Gypsies and Travellers and set out policies about small privately owned sites. Gypsy and Traveller communities should be involved in identifying sites for their use.

59. I appreciate that Policy Hou 9 has not gone as far as to identify a specific site or sites to meet these needs but rather it sets out criteria to guide future provision. In the

absence of a specific site search, I consider that paragraph 223 could go further to reflect the pro-active stance set out in Scottish Planning Policy. Accordingly my recommendation adds a sentence on working in consultation with the gypsy and travelling community to identify an appropriate site in the context of this policy.

60. The policy does not presume against sites outwith the urban area and Policy Env 10 on development in the green belt and countryside does reference proposals where a countryside location is essential. This would provide some scope for greenfield locations in the absence of an alternative location in the urban area. Consequently I find no need for a specific reference to this in either Policy Hou 9 or Policy Env 10.

Hou 10 Community Facilities

61. Policy Hou10 references health and other community facilities and paragraph 224 includes specific reference to community halls. Given that Policy Env 19 applies to playing fields and any other form of indoor sports provision is likely to fall to a commercial provider I consider that the issue of protection existing sports facilities and planning positively for new provision is sufficiently addressed.

62. I agree that community facilities can apply to a range of uses depending on the circumstances but it may not be practicable or reasonable to extend this protection to all commercial premises. Policies can only address land use planning matters and not the future commercial viability and sustainability of individual businesses. For this reason I consider that it would be inappropriate to include a detailed definition of all cultural facilities. Paragraph 224 refers to facilities necessary to foster community life. I consider the existing references and policy, as carried forward from the current local plan, are sufficient.

63. I have reflected the Scottish Planning Policy town centre first approach through my conclusions on the location of office development and in the shopping and leisure section of the plan. I consider that inclusion of a new over-arching policy (as recommended below through new Policy Ret 1) gives this matter appropriate emphasis (see below). Policy Hou 10 has a focus on the co-location of housing with the necessary community facilities. Whilst town centres also have clear role in this respect I consider this is more appropriately addressed through a new stand- alone town centre first policy. Consequently I do not recommend any change to Hou 10 to address this matter

64. I appreciate that health care provision is not specifically referenced in the developer contribution policies but is specifically mentioned through Policy Hou 10. Reference to Scottish Planning Policy provides clarity that co-ordination of housing land release with investment in infrastructure including transport and educational investment is an important consideration. This matter is also raised in relation to Issue 21 and Homes for Scotland's response to Further Information Request 6 is relevant in this respect.

65. Policy Hou 10 sets out a requirement for housing development to be served by the necessary health and community facilities rather than the mechanism for doing so. However for the avoidance of doubt and in compliance with Circular 3/2012 I consider it necessary to clarify this in the context of any impact arising directly from the proposal. In this context I find the wording proposed in representation a helpful addition " "relative to the impact and scale of development proposed". My recommendation reflects this.

66. Developer contributions are specifically addressed through Part 2 Section 1 of the

plan on delivering the strategy. Recommended changes in this section of the plan reflect our conclusion that, given the available evidence, the main focus of such contributions is on schools, transport infrastructure and green space provision. Additional text has been inserted on the specific matter of health contributions to address representation from the health board. This references the importance of health provision but also accepts the lack of current information or justification on the scale of the required provision and the associated need for contributions.

67. I note that growth allocations set out in the Plan have been discussed with the Edinburgh Community Health Partnership. This work has taken account of known student housing developments. I appreciate that the student population can put additional strain on infrastructure provision but the student population is determined by the capacity of the city's education institutions. Failure to cater for this demand would simply increase the pressure on the existing housing stock rather than decrease the amount of students. I have discussed above the difference in approaches between health care and other forms of infrastructure such as roads and education. In this instance the universities and colleges also play an important role in providing the required social and community infrastructure. Consequently I do not consider that Policy Hou 10 should specifically reference student accommodation.

Retail Policies

Town Centre First

68. Scottish Planning Policy (paragraphs 58-69) places considerable emphasis on town centres as the primary location when planning for uses which generate significant footfall. I appreciate that this section of the plan is focussed on shopping and leisure and the relative roles of city, town, commercial and local centres. I have separately addressed a town centre first approach in relation to Policy Emp 1. I appreciate the council's view that this approach is set out through its specific policies Ret 1-5. However, I consider that to set out a clear message and reflect the appropriate emphasis there should be a single policy that fully covers the town centres first approach as set out in Scottish Planning Policy. My recommendation reflects this. I have included some corresponding changes to paragraph 227 to provide consistency with the new policy but retain the existing references to adjoining council areas and the possible application of retail assessment to smaller proposals.

Policy Ret 1 City Centre Retail Core

69. I acknowledge that it is important to create a safe and attractive environment for all. However, traffic access can often run contrary to this objective so far as pedestrians are concerned. A key focus for town centres is enhancing pedestrian footfall. In any event the wider road network and traffic management fall to other transport policies and strategies rather than to specific retail proposal. My conclusion is that the wording of criteria d) is sufficient in this respect.

70. As this policy is directed at proposals for retail development I do not consider it would be appropriate to include reference to wider issues such as advertising and the general street-scene and public realm. These are more general matters to be addressed through public realm and street-scape initiatives. My conclusion is that no change is required.

71. Whilst a variety of shops will undoubtedly assist in retail choice and the attractiveness of the town centre there is no mechanism to address this through the planning system. Consequently I do not consider that reference to retail variety in this policy would be appropriate.

Policy Ret 2 – Town Centres

72. With regard to the request to delete the text 'or can form an effective extension to the centre' and replace this within “within easy walking distance” I prefer a slightly amended alternative. The key here is that the site functions alongside the town centre without an adverse impact, that it might promote linked trips to other town centre shops and facilities and that it is easily and safely accessed from the town centre. By the nature of these requirements this will generally mean that such locations should be in easy walking distance.

73. Consequently I propose some addition to the text to include reference to safe and convenient pedestrian access and the potential for linked trips. My recommendation reflects this.

74. The reference to supplementary guidance does not indicate that this would be statutory guidance and as such it would not carry the weight of inclusion in the development plan. Nonetheless, it may provide guidance on current considerations that cannot await update through the development plan process. The text does state that guidance may be prepared and given I have no representation requesting deletion of this reference I am content to leave it to the council to consider the scope for this to extend to town centre boundary changes and the approach it would take to consultation. The guidance itself falls outwith the remit of this plan.

Policy Ret 3 – Commercial Centres

75. I understand that retail formats are changing and different approaches may emerge to reflect online shopping habits. However, paragraph 63 of Scottish Planning Policy references the appropriate scale of development and that it should help to meet qualitative or quantitative deficiencies. I consider that scale is a relevant consideration in assessing whether a sequentially preferable location could be found and also in terms of its potential impact on town centres. My conclusion is that no change is required.

Policy Ret 4 – Local Centres

76. Town centre boundaries are drawn to reflect the logical boundary of the retail and commercial area. It would not be appropriate or consistent to revise this boundary in any particular area purely on the basis of excluding large scale advertisement hoardings. Any advertisement proposals would fall to be assessed through the development management process. My conclusion is that no change is required.

Policy Ret 5 – Out-of-Centre Development

77. My conclusion reflects that above in that reference to qualitative improvement is supported through Scottish Planning Policy (paragraph 73) which is specific to out of centre locations.

Policies Ret 6 and 7 Entertainment and Leisure Uses

78. Policies Ret 6 and Ret 7 refer to proposals for new entertainment and leisure development in the city. Whilst I appreciate concern about protecting existing cultural facilities such as theatres I have no evidence that this is a particular issue in the city or that it is one that could be appropriately addressed through the planning system. Reference to protection would only be relevant if this was justified and where it was clear how such a policy could be implemented. Consequently, I do not recommend any change in this respect.

79. Planning policies cannot cover every eventuality and I would be concerned about diluting the emphasis placed on town centres. However, I consider there is sufficient flexibility in the terms "compatible with its surroundings" and in discounting "unsuitable locations" to enable consideration of proposals which may be location specific.

Policy Ret 8 Alternative Use of Shop Units and Policy Ret 9 Alternative Use of Shop Units in Other Locations.

80. Scottish Planning Policy paragraph 67 recognises concerns about the number and clustering of some non-retail uses such as betting offices and money lending premises in some town and local centres. However it does not suggest an embargo on such uses but rather a focus on an appropriate mix of uses. Whilst support is given to a policy approach to prevent over provision or clustering of these sort of uses this would have to be based on the appropriate evidence that this was actually having a detrimental effect on the character and amenity of centres and the well-being of communities. Such evidence would normally be drawn from the town centre strategy. In the absence of such justification I do not consider it would be appropriate to place a limit on further such development whether in Corstorphine or elsewhere.

81. I appreciate the approach to primary retail frontages in town centres is established through the Edinburgh City Local Plan. However the blanket application of policy through-out the city may restrict the potential to tailor the approach to individual circumstances. The preparation of statutory Supplementary Guidance as outlined in paragraph 248 of the plan is intended to guide change of use applications in each of the nine town centres. There is no detail as to how this is to be approached but this guidance is specifically referenced in Policy Ret 8. Given the need to establish the principles of any Supplementary Guidance in the plan (as explained in Circular 6/2013) the scope of this would be limited to further detail on the implementation of the policy as set out in this plan.

82. I consider a tailored approach is sensible as this can reflect the relative strengths and particular characteristic of the centre. Consequently, I do not consider that reference to primary retail frontages need be retained. Statutory supplementary guidance once approved forms part of the development plan and will carry the relevant weight in the decision making process.

83. In certain circumstances there may no longer be a justification to retain retail premises. In these cases I consider it is preferable to have a policy approach to enabling alternative uses such as residential. This approach avoids the negative consequences of long term vacancies including the deterioration of the building. It would not be appropriate to refer to specific sites or locations such as Pentland View Court or the site of the former Currie Primary School in these more general policies.

84. Given the context of the proposed Supplementary Guidance and the move towards a tailored approach for individual centres I consider that a reference to town centre health checks could appropriately be included in accordance with Scottish Planning Policy. The purpose of a health check is to assess a town centre's strengths, vitality and viability, weaknesses and resilience (Scottish Planning Policy paragraph 64). This would establish a sound evidence base on which to approach the detailed implementation of Policy Ret 8. My modification reflects this**.**

85. Criteria a) relates only to local centres and the combination of a) and b) both apply in seeking to retain a retail function for these centres. The detailed approach in the city centre is to be set out in separate Supplementary Guidance. The reference to shop units as defined in the glossary would include basement units which are accessed directly from the street.

86. I note that Sensitive Areas are defined in the Guidance for Business non statutory guidance in relation to food and drink establishments. In the absence of detailed evidence of the concentration of such uses and the nature of any current impacts I would not be in a position to conclude that the west end of Rose Street/George Street should be added to the list of sensitive areas. Amendment of guidance or changes other than those required to address the issues raised in representation fall outwith the scope of this examination.

87. Policy Ret 8 does not reference specific locations as it is a general policy to be defined through more detailed supplementary guidance. Circular 6/2013 Development Planning helps to define the relative split between the principles to be established in the development plan and further supporting detail which can be addressed in Supplementary Guidance. In this respect I have some sympathy with the view that a firmer basis for the Supplementary Guidance could have been established in the plan as subject to this examination.

88. However when read with the supporting text the objectives of this policy and its locally tailored approach are sufficiently clear. If the criteria on 'four or more consecutive non-shop uses' is to carry weight in the decision making process I consider it is correctly included in the policy. I find no detailed justification to support a conclusion that this approach is overly rigid or that it fails to reflect the policy objective of maintaining the retail function of local centres. The policy does not reference core and primary frontages so they would have no basis to be included on the proposals map. Consideration of comments addressed specifically at the proposed Supplementary Guidance fall outwith the scope of this examination.

Reporter's recommendations:

Modify the proposed plan as follows

1. Delete Policy Emp 1 and replace as follows:

High Quality office development including major developments will be supported:

a) In the City Centre as identified on the Proposals Map

b) In other strategic business centres identified on the proposals map at Edinburgh Park South Gyle, the International Business Gateway and Leith preferably as part of business

led mixed use proposals

c) in town or local centres as identified in Table 6 and on the Proposals Map (where of an appropriate scale).

Where it is demonstrated that sites in locations a-c above are unavailable or unsuitable other accessible mixed use locations may be considered where:

In proximity to public transport nodes, compatible with the accessibility of the location by public transport and with the character of the local environment, and
For any development exceeding 2500 square metres an assessment of impact has been prepared which demonstrates that the impact on existing town centres is acceptable.

2. Delete the text in bold in Policy Emp2 Edinburgh Bioquarter and replace with:

Development within the boundary of Edinburgh Bioquarter as defined on the Proposals Map will be granted provided it accords with the Bioquarter Development Principles (Part one section 5) to be further detailed through Supplementary Guidance.

3. After the second sentence in paragraph 195 insert:

This policy also supports the development of the National Performance Centre for Sport and directly related development.

4. Replace paragraph 208 in support of revised Policy Hou 1

208. Policy Hou 1 reflects the emphasis on delivery of the identified land supply. However, it also sets out a mechanism through which to bring forward additional land if a 5 year supply is not maintained. The criteria which apply reflect the considerations already established through SESplan(Policy 7) as well as the Scottish Planning Policy presumption in favour of sustainable development. Whilst the green belt is established by the plan this should not automatically preclude housing development where the relevant balance of considerations points to approval and the objectives of the city wide designation of green belt are maintained.

5. Delete Policy Hou 1 and replace as follows:

1. Priority will be given to the delivery of the housing land supply and the relevant infrastructure* as detailed in Part 1 Section 5 of the Plan including:

- sites allocated in this plan through tables 3 and 4 and as shown on the proposals map

- as part of business led mixed use proposal at Edinburgh Park/South Gyle

- as part of the mixed use regeneration proposals at Edinburgh Waterfront (Proposals EW1a-EW1c and EW2a-2d and in the City Centre).

- On other suitable sites in the urban area, provided proposals are compatible with other policies in the plan

2. Where a deficit in the maintenance of the five year housing land supply is

identified (as evidenced through the housing land audit) greenfield/greenbelt housing proposals may be granted planning permission where:

a) The development will be in keeping with the character of the settlement and the local area

b) The development will not undermine green belt objectives

c) Any additional infrastructure required* as a result of the development and to take account of its cumulative impact, including cross boundary impacts, is either available or can be provided at the appropriate time.

d) The site is effective or capable of becoming effective in the relevant timeframe.

e) The proposal contributes to the principles of sustainable development.

* This should be addressed in the context of Policy Del 1, Trans X and the associated supplementary guidance.

6. Amend Policy Hou 4 c) to read:

The accessibility of the site including access to public transport.

7. Amend the supporting text to Policy Hou 5 by adding the following at the end of paragraph 215:

However, conversions to residential use could be supported where the shop unit has been vacant for a significant period of time and been actively marketed, where there is local need and demand for a range of housing types and for town centre living.

8. Add the following to the end of paragraph 218:

Where planning permission is sought for specialist housing an affordable housing contribution may not always be required depending on the nature of the specialist housing being proposed and economic viability considerations.

9. Replace Policy Hou 8 Student Accommodation criteria a) and b) to read:

a) The location is appropriate in terms of access to university and college facilities by walking, cycling or public transport
b) The proposal will not result in an excessive concentration of student accommodation(including that in the private rented sector) to an extent that would be detrimental to the maintenance of balanced communities or to the established character and residential amenity of the locality.

10. Replace the final sentence in paragraph 221 with:

In general such provision can take place at relatively high densities. Open space and car parking provision can be tailored to reflect the nature of the proposed use. However these considerations should not compromise design quality.

11. Add the following sentence to paragraph 223 following Policy Hou 9:

There is a commitment to working in consultation with the gypsy and travelling community to identify an appropriate site(s) in the context of this policy.

12. Add the following at the end of the first sentence of policy Hou 10 “relative to the impact and scale of development proposed”.

13. Add the following new Policy at the end of paragraph 226 and delete paragraph 227 with consequent renumbering of the remaining retail policies:

Policy Ret 1: Town centres first policy

Planning permission will be granted for retail and other uses which generate a significant footfall including commercial leisure use, offices, community and cultural facilities and where appropriate libraries, education and healthcare facilities following a town centre first sequential approach in the following order of preference:

- Town centres(including city and local centres)
- Edge of town centre
- Other commercial centres as identified in the plan
- Out of centre locations that are or can be made accessible by a choice of transport modes

Where a retail or leisure development with a gross floorspace over 2500sqm or occasionally for smaller proposals, if proposed outwith a town centre and contrary to the development plan, a retail impact analysis will be required sufficient to demonstrate that there is no significant adverse effect on the vitality and viability of existing town centres. Town and local centres within adjoining Council areas will also be considered when assessing retail impact if they fall within the intended catchment area of the proposal.

14. In the final paragraph of Policy Ret 2 following criteria e) amend to state “or can form an effective extension to the centre by promoting linked trips with safe and easy access to the town centre, where it is clear -----”.

15. In Policy Ret 8 under criteria b) Supplementary Guidance will detail an approach tailored to different parts of the city centre retail core and each town centre to be informed by town centre health checks which will assess the centres strengths, vitality and viability, weaknesses and resiliencies.

Issue 24	**Transport Policies and Resources & Services Policies**	
Development plan reference:	**Part 2 Section 7 – Transport** **Pages 111 – 115** **Part 2 Section 8 – Resources and Services** **Pages 116-119**	**Reporter:** Richard Bowden

Body or person(s) submitting a representation raising the issue (including reference number):

0124 sportscotland 0432 Greener Leith 1023 Edinburgh Airport 1503 Mobile Operators Association 1654 Portobello Opposes New Garbage 1660 Adrian Graham 2088 Scottish Government 2126 Cockburn Association 2313 Jeremy Darot 2480 Rosebery Estates Partnership 2687 Leith Central Community Council	2697 Scottish Natural Heritage 2699 Scottish Environment Protection Agency 23 individuals seeking a change to Policy RS 3 listed in Issue 24 Appendix A 16 individuals supporting the safeguarding of Seafield for a waste management facility in Policy RS 3 listed in Issue 24 Appendix B

Provision of the development plan to which the issue relates:	Part 2 Section 7 – Transport provides policies for the transport requirements for new development; car and cycling parking and the policy framework for the public transport proposals and safeguards and the cycle and footpath network as identified in Table 9 Part 1 Section 3 and in the Proposals Map. Part 2 Section – 8 Resources and Services provides policies on sustainable energy, waste, minerals, water supply and drainage and telecommunications.

Planning authority's summary of the representation(s):

CONTEXT

The Main Issues Report Chapter 8 consulted on policy change in relation to carbon reduction, green roofs and combined heat and power plant and waste management. The Plan retains transport policies largely unchanged from the previous local plans, in line with the approach set out in paragraphs 1.2-1.3 of the Main Issues Report.

TRANSPORT POLICIES

Policy Tra 1 – Location of Major Travel Generating Development

- Paragraph 273 of Scottish Planning Policy states that 'Plans should identify active travel networks and promote opportunities for travel by more sustainable modes in the following order of priority: walking, cycling, public transport, cars.' Currently Policy Tra 1 and paragraph 258 seem to prioritise public transport over walking and cycling, contrary to the priority established in Scottish Planning Policy. **(2088 Scottish Government)**
- One of the new Scottish Planning Policy 's policy principles (paragraph 60) is that 'the planning system should apply a town centre first policy when planning for uses which attract significant numbers of people, including retail and commercial leisure,

offices, community and cultural facilities'. Policy Tra 1 directs major development which would generate significant travel demand to suitable sites in the City Centre. Policy Tra 1 does not refer to town centres. Whilst there is a reference in the paragraph 258 to town centres, it would give greater weight to the town centre first approach if they were referenced in the text itself. In addition, the policy or its supporting text could helpfully set out the requirements for assessments on the impact on town centres as set out in paragraph 71 of Scottish Planning Policy. **(2088 Scottish Government)**

- Considers that the definition in paragraph 258 of 'major developments which would generate significant travel demand' is too narrowly drawn, and should be expanded to include major educational establishments, hospitals and also the present, and any future, park-and-ride sites. **(2126 Cockburn Association)**

Policy Tra 2 - Private Car Parking

- Considers that no-one has the 'right' to park their car on a public road. Therefore, the potential impact on the amenity of neighbouring occupiers should not be a factor used to justify higher private parking provision. States that if a new development is likely to cause 'parking congestion' in a neighbourhood, this should be mitigated by additional parking regulation. Air quality needs to be properly considered in the planning process. **(0432 Greener Leith; 1660 Adrian Graham; 2687 Leith Central Community Council)**

Other Matters

- Access rights extend outwith the city boundary and apply off path, off core path, on water and to a range of activities (not just walking and cycling) and to circumstances and environments not adequately covered by policies Tra 8 or Env18. Local authorities have a statutory duty (Land Reform Act) to uphold access rights and Scottish Planning Policy is clear local authorities should protect access rights when preparing development plans **(0124 sportscotland).**
- Strong support for lowering speed limits throughout the city to 20mph for all main roads including arterial, shopping and residential streets. 20 mph speed limits have numerous public benefits; promote road safety, active travel and cut air pollution. They should apply to new roads from the outset of new development. **(0432 Greener Leith; 1660 Adrian Graham; 2687 Leith Central Community Council)**
- Whilst the need for the designation is acknowledged, the policy as it relates to replacement houses in the Airport Public Safety Zone is not equitable and flexibility should be introduced to provide for the replacement of existing dwellings (where not acceptable on the existing site for safeguarding reasons) on an alternative site elsewhere within the same ownership. **(2480 Rosebery Estates Partnership)**

RESOURCES AND SERVICES

Policy RS 1 - Sustainable Energy

- Scottish Planning Policy does not identify green belt as a constraint on wind energy development in the spatial framework approach (Scottish Planning Policy Table 1 page 39). Green belt should be a consideration for decision making on individual planning applications for wind turbines rather than a general policy position relative to wind turbines. There would need to be a clear reasoning why the green belt would not be suitable for wind turbine development, supported by

landscape capacity analysis**. (2088 Scottish Government)**

- It is suggested that Policy RS1 is amended to specify the need for aviation safeguarding. This is to ensure that the potential impact of wind turbines or flues associated with energy generation do not adversely affect aviation safety. **(1023 Edinburgh Airport)**
- The European Directive 2009/28/EC Article 13 specifies the efficiency standards to be met by biomass/woodfuel energy systems in order to deliver adequate carbon and energy savings. Ensure that large scale biomass power plant proposals are scaled appropriately to local heat demand and operate at an acceptable efficiency to ensure that they deliver genuine carbon savings over coal-fired plants. Considers it would provide strong incentives for developers to produce realistic plans setting out how the considerable amounts of heat that are produced by these types of plants would be used for practical benefit. Suggest an amendment to Policy RS 1 which refers to air quality. **(0432 Greener Leith; 2687 Leith Central Community Council; 1660 Adrian Graham; 2313 Jeremy Darot)**
- Suggest changes to address heat in the Plan. States that the policy should give consideration to the provision of energy centres within new development. In the event that substantive changes are not practical, it is recommended that an explicit reference to the potential for supplementary guidance on heat mapping and establishing district heating and/or cooling networks be considered. Scottish Planning Policy paragraph 157-160 are clear on what is expected of LDPs in relation to heat. Considers there to be no evidence in the proposed plan to suggest that heat mapping or co-location of development to support district heat network development has been considered. The LDP also lacks reference to other potential low carbon and renewable technologies that could be used with district heating. **(2088 Scottish Government)**
- Support the positive policy framework regarding proposals for district heating/heat networks/energy from waste plants in Policy RS 1. In particular, the commitment to explore the local reuse of heat energy is supported. This approach reflects objectives of paragraph 158 and 159 of Scottish Planning Policy, the 'low carbon place' objectives of National Planning Framework 3 and the aims of the Zero Waste Plan. **(2699 Scottish Environment Protection Agency)**
- Suggests amending policy wording of Policy RS 1 to avoid misinterpretation with the potential for abuse, and to clarify meanings for the lay reader. **(2126 Cockburn Association)**
- Recommend that the first sentence of paragraph 276 is reviewed as the current reference to 'freestanding wind turbines' may, to some readers, imply that the policy applies only to individual turbines. As currently written, the second sentence of paragraph 276 implies that cumulative impacts are the only issue against which wind energy proposals will be assessed. **(2697 Scottish Natural Heritage)**

<u>Policy RS 3 – Waste Management Facilities</u>

- Concerns raised about the assessment criteria for new waste management facilities in Policy RS 3 include: the proposal to drop the requirement to demonstrate a need for new waste facilities; considers that the requirement to demonstrate that any proposal for a waste management site is the Best Practicable Environmental Option, as per Edinburgh City Local Plan Policy Inf 2 and Planning Advice Note 63, needs to be retained; 'adverse impact' in Policy RS 3c) must be defined and specified and considers that it is up to the proposers of a new waste management or treatment site to justify its location especially when it

encounters forceful local opposition. **(1654 Portobello Opposes New Garbage Site; 23 individuals listed in Issue 24 Appendix A)**

- Support the clear guidance provided in Policy RS 3 which is in line with Scottish Planning Policy paragraph 186. The approach is also in accordance with Annex B of the Zero Waste Plan. The proposed policy framework clearly identifies a specific waste management site at Seafield but also has the flexibility to direct developers toward other areas where waste facilities are considered appropriate. **(2699 Scottish Environment Protection Agency)**
- Amend the final paragraph of Policy RS 3 which relates to Seafield to avoid pre-judging the outcome of the Development Management process. **(2088 Scottish Government)**
- Supports the safeguarding of the site at Seafield for waste management facilities. Considers that, between this site, and the large site at Millerhill, there will be adequate provision of waste management facilities for the area. **(1654 Portobello Opposes New Garbage Site; 16 individuals listed in Issue 24 Appendix B)**

Policy RS 5 – Minerals

- Craigiehall Quarry benefits from planning permission reference 02/03434/MPR review of dormant minerals permission to enable the restoration of the existing quarry by inert backfilling and landscaping works including recycling of inert materials and green waste composting, as amended. It is understood that there is 250,000 sqm of capacity here, following final extraction of the minerals, which could provide a useful contribution towards meeting the waste management requirements of the City. **(2480 Rosebery Estates Partnership)**
- Amend policy to safeguard mineral resources from sterilisation and to seek prior extraction. Scottish Planning Policy provides support for this approach. **(02723 The Coal Authority)**

Policy RS 7 – Telecommunications

- Cumulative impact is a common problem and suggests amendments to the policy wording of Policy RS 7 to improve clarity. **(2126 Cockburn Association)**
- Support the inclusion of Policy RS 7 to facilitate telecommunications development and support its provisions. This is in accordance with National Policy and Guidance on telecommunications developments. **(1503 Mobile Operators Association)**

Modifications sought by those submitting representations:

TRANSPORT POLICIES

Policy Tra 1 – Location of Major Travel Generating Development

- Amend the text in Policy Tra 1 to promote walking first in accordance with Scottish Planning Policy paragraph 273. Amend final paragraph in Policy Tra 1 page 112 to read '…with regard to access by walking, cycling and public transport and that…' Amend paragraph 258 final sentence to read '…catchment area by walking, cycling or frequent public transport services.' **(2088 Scottish Government)**
- Amend the text in Policy Tra 1 add 'or town centres' after 'suitable sites in the City Centre'; and add a new first criterion: 'a) whether the site is in a town centre'.

(2088 Scottish Government)

- Amend first sentence of paragraph to include: 'educational establishments', 'hospitals' and 'major park & ride facilities'. **(2126 Cockburn Association)**

Policy Tra 2 – Private Car Parking

- Amend the text of Policy Tra 2 by deleting the first part of criterion b): 'whether there will be any adverse impact on the amenity of the neighbouring occupiers, particularly residential occupiers through on-street parking around the site'. Insert a new criterion: 'whether the proposed parking levels are likely to promote private car ownership to the extent that the development will have an adverse cumulative impact on an air quality management area, or are likely to require the designation of a new air quality management area.' **(0432 Greener Leith; 1660 Adrian Graham; 2687 Leith Central Community Council)**

Other Matters

- Suggests a new policy is required further to Policy Tra 8 and Policy Env 18 which should read - 'Development will be refused where there will be a clear negative impact on important access rights and routes and where that impact cannot be acceptably mitigated against'. **(0124 sportscotland).**
- Amend Policy Tra 9 to insert: 'New roads should normally have a speed limit of 20mph applied from the outset.' **(0432 Greener Leith; 1660 Adrian Graham; 2687 Leith Central Community Council)**
- Amend Policy Tra 11 by including: c) 'replacement of an existing house on a new site, within the same ownership, outwith the zone'. **(2480 Rosebery Estates Partnership)**

RESOURCES AND SERVICES PROPOSALS

Policy RS1 - Sustainable Energy

- Remove the final sentence of paragraph 276 of the Plan. If a reference to the application of green belt policy is required at this point, insert a reference to Policy Env 10. **(2088 Scottish Government)**
- Add a third criterion to Policy RS 1 to ensure that aerodrome safeguarding is maintained. The following wording is suggested - 'c) will not affect the safe operation of Edinburgh Airport'. **(1023 Edinburgh Airport)**
- Amend the text in paragraph 278 of Policy RS 1 (or add to third criterion) to state: 'large-scale biomass fuelled combined heat and power plants above 10MW will not be consented unless the developer can show that the plant will comply, when the plant first becomes operational, with European Union directive 2009/28/EC on renewable energy, which states in article 13: 'In the case of biomass, Member States shall promote conversion technologies that achieve a conversion efficiency of at least 85% for residential and commercial application and at least 70% for industrial applications.' **(0432 Greener Leith; 2687 Leith Central Community Council; 1660 Adrian Graham; 2313 Jeremy Darot)**
- Policy RS 1 should support the development of heat networks in as many locations as possible, identify where heat networks, heat storage and energy centres exist or would be appropriate and include policies to support their implementation, support safeguarding of pipe-runs within development for later connection and pipe-work to

the curtilage of development. The policy should give consideration to the provision of energy centres within new development. If these substantive changes to the policy are not practical, an explicit reference to the potential for supplementary guidance on heat mapping and establishing district heating and/or cooling networks needs to be considered. **(2088 Scottish Government)**

- Delete 'do not cause significant harm to' in criterion a) of Policy RS 1 and insert 'avoid damaging'. In criterion b) of Policy RS 1, delete 'unacceptably' and insert 'detrimentally'. **(2126 Cockburn Association)**
- Amend the text in the first sentence of paragraph 276 to clarify the type of development this policy applies to (e.g. single and groups of wind turbines). Also insert 'individual and' into second sentence after 'their'. **(2697 Scottish Natural Heritage)**

Policy RS 3 – New Waste Management Facilities

- Amend the text in Policy RS 3 criterion b) to add: 'where it is demonstrated that there is a need for the facility and that the proposal represents the best practicable environmental option'; and delete criterion c). **(1654 Portobello Opposes New Garbage Site; 22 individuals listed in Issue 24 - Appendix A)**
- Amend the text in the final paragraph of Policy RS 3, first sentence to: 'Seafield is designated (EW 1d on the Proposals Map) for a waste…' **(2088 Scottish Government)**

Policy RS 5 – Minerals

- Amend the wording of Policy RS 5 to read '...Bonnington Mains, Ravelrig and Craigiehall Quarry' and add notation to the Proposals Map. **(2480 Rosebery Estates Partnership)**
- Amend the wording of Policy RS 5 to include a new sentence at the end: 'Mineral resources will be safeguarded generally from sterilisation by non-mineral surface development, where non-mineral surface development takes place the prior extraction of the mineral resources will be considered where feasible.' **(02723 The Coal Authority)**

Policy RS 7 – Telecommunications

- Suggests amending criterion a) of Policy RS 7 to insert 'including its cumulative impact' after 'development'. **(2126 Cockburn Association)**

Summary of responses (including reasons) by planning authority:

TRANSPORT POLICIES

Policy Tra 1 – Location of Major Travel Generating Development

- No modification proposed, however, the Council sees merit in part of this representation to amend the wording in paragraph 258 to include reference to cycling. This policy is for determining whether major non-residential, destination uses are acceptable in principle in a given location. Such uses by their nature will generate trips from a wide area over distances typically covered by private car. The focus of the policy is therefore on ensuring good access by public transport as

an alternative. In this respect, Scottish Planning Policy paragraph 279 is more relevant than paragraph 273. The latter appears focused on the location of development which is a source of trips (e.g. to local amenities). Such development is typically housing, which forms the majority land use in a spatial strategy. **(2088 Scottish Government)**

- The criteria a) – c) in Policy Tra 1 assesses the suitability of non-City Centre sites and therefore it would not be logical to include reference to town centre locations as suitable in principle in the first sentence of the policy, and then again as an additional criterion for elsewhere. Paragraph 258 clearly states that major travel generating developments will also be encouraged to locate in the identified town centres, subject to qualifications relating to scale and nature. Introducing reference to town centres in the policy wording would introduce conflict with those qualifications. No modification proposed. **(2088 Scottish Government)**
- Paragraph 258 states that Policy Tra 1 applies to major offices, retail, entertainment, sport and leisure uses and other non-residential developments which generate a large number of journeys by employees and visitors. The Council considers this statement is sufficient to illustrate the relevant uses and captures the uses this representation seeks reference to. No modification proposed. **(2126 Cockburn Association)**

Policy Tra 2 Private Car Parking

- The criteria in Policy Tra 2 relates to the justification for private parking provision at a lower level than non-statutory Council guidance. These criteria were introduced in the adopted Edinburgh City Local Plan to allow for low or no car developments for various reasons, including air quality management objectives. It is nevertheless reasonable to consider how lower provision may impact on existing streets and the amenity of neighbours. Paragraph 262 of the Plan states that a lower level of parking provision is only likely to be acceptable where there is existing or planned on-street parking controls. Policy Env 22 of the Plan will be used to assess whether proposals will have an adverse affect on air quality in defined Air Quality Management Areas or if cumulative impacts may lead to the creation of further Air Quality Management Areas in the city. It is considered that this proposed change would introduce an unnecessary repetition. No modification proposed. **(0432 Greener Leith; 1660 Adrian Graham; 2687 Leith Central Community Council)**

Other Matters

- Access rights are managed and enforced through other regulatory processes than the planning system. Policies Tra 8 and Env 18 are largely unchanged from the adopted Edinburgh City Local Plan and no monitoring evidence indicates that they are insufficient in terms of Planning's role in protecting access. A new policy is not justified. No modification proposed. **(0124 sportscotland).**
- Policy Tra 9 relates to new development that would prejudice the new roads proposals or improvements to the road network as identified in Table 9 in Part 1 Section 3 of the Plan. The Council initiative to reduce the speed limit to 20 mph on residential and shopping streets is separate to planning policy, using Speed Limit Orders and will come into effect from late 2015 onwards. The speed limit for any new road provided for in Table 9 is a matter for implementation under roads legislation and outwith the scope of the Plan. No modification proposed. **(0432 Greener Leith; 1660 Adrian Graham; 2687 Leith Central Community Council)**

- Policy Tra 11 relates only to development proposals within the Airport Public Safety Zones. The modification sought refers to development proposal for a replacement house outwith the Zone and therefore is outwith the scope of the policy context. A replacement house in a location elsewhere in the Plan area will be assessed against all other relevant policies in the Plan. No modification proposed. **(2480 Rosebery Estates Partnership)**

RESOURCES AND SERVICES PROPOSALS

Policy RS 1 – Sustainable Energy

- The objectives of the Edinburgh Green Belt are set out in Part 1 Section 2 of the Plan and accord with Scottish Planning Policy paragraph 49. Policy Env 10 states that development in the Green Belt would only be permitted where it would not detract from the landscape quality of the area. Much of the Plan's green belt designation lies within 2km of the edge of the urban areas. This is defined in Scottish Planning Policy Table 1 as a potential area of significant protection. Due to topography, much of this area is visible from within the urban areas. The Council considers it appropriate to reiterate the role of Edinburgh's green belt in providing the landscape setting for the city in paragraph 276 as it relates to wind turbines. It should be noted that the current wording does not rule out wind turbines in the green belt. No modification proposed. **(2088 Scottish Government)**
- Policy Tra 11 adequately restricts most new development against in the Airport Public Safety Zone and therefore it would be unnecessary and unjustified to add a third criterion to Policy RS 1 to ensure that aerodrome safeguarding is maintained. No modification proposed. **(1023 Edinburgh Airport)**
- Policy RS 1 provides the criteria to assess the impact of sustainable energy proposals on the environment and residential amenity. The efficiency and technical compliance of energy plants are licensed separately and regulated by Scottish Environment Protection Agency. This European Directive is translated into national provisions and the 2020 Routemap for Renewable Energy in Scotland. It is unnecessary and inappropriate to introduce repetition of matters controlled by separate regulatory regimes. No modification proposed. **(0432 Greener Leith; 2687 Leith Central Community Council; 1660 Adrian Graham; 2313 Jeremy Darot)**
- The Plan identifies heat and climate change targets in Part 1 Section 2, on page 9. Policy Des 6 and its supporting paragraphs require carbon reduction measures in new development including district heating infrastructure. Policy Des 5 requires development designers to integrate low and zero carbon technology sensitively into the design of development. Policy RS 1 provides positive support for the generating plant required for heat networks, and its supporting paragraph 278 sets out the Council's expectations in terms of connections.

  Outwith the Plan, the Council supports renewable heat and has published in draft form its Sustainable Energy Action Plan, which aims to achieve a 42% reduction in carbon emissions in the city by 2020. A key priority of this document will be to address renewable heat and increase the use of district heating in the city. The Action Plan has two key areas of focus in terms of district heat: a) completing a comprehensive heat map to assess the areas of high energy density and inform the business cases for new projects and b) completing feasibility studies for district heating at major new developments including the BioQuarter, Fountainbridge, West Edinburgh and North Edinburgh. This work will inform both the future location

of development and the future comprehensive masterplanning of these areas. The further provisions of Scottish Planning Policy in terms of heat networks appear to go beyond those currently enforceable by the planning system. Pipe runs, as with other conduit services (e.g. gas, water) are permitted development usually located under roadways, and their provision or otherwise cannot be enforced by local planning authorities. Supplementary guidance is subject to no less onerous requirements in terms of practicality and enforceability than the LDP part of the statutory Development Plan and it would not be appropriate to attempt to use supplementary guidance for matters which would not be enforceable if they were in the LDP. No modification proposed. **(2088 Scottish Government)**

- The Council does not consider that the suggested wording changes add clarity to Policy RS 1: 'do not cause significant harm to' and 'unacceptably affect'. The current wording makes clear the intent of the policy and allows the decision maker some discretion when applying it. No modification proposed. **(2126 Cockburn Association)**
- No modification proposed, however, the Council sees merit in part of this representation to clarify in the second sentence of paragraph 276 that wind turbine proposals will be assessed for their individual and cumulative impact. There is no justification to amend the first sentence, which is worded to summarise positively the Council's position on wind turbines. That the policy applies to all types of wind turbine proposals could be clarified by adding the word 'All' at the start of the second sentence. **(2697 Scottish Natural Heritage)**

Policy RS 3 New Waste Management Facilities

- The wording of Policy RS 3 reflects changes to national policy set out in the Zero Waste Plan for Scotland. The reason for this change from policy in the adopted Edinburgh City Local Plan was given in the Main Issues Report (see Question 19). Criterion c) is appropriate as there would be no justification to refuse planning permission where there are no adverse impacts. In line with Scottish Planning Policy paragraph 176, Policy RS 3 supports the delivery of infrastructure at appropriate locations while leaving the regulation of permitted installations to Scottish Environment Protection Agency. No modification proposed. **(1654 Portobello Opposes New Garbage Site; 22 individuals listed in Issue 24 Appendix A)**
- No modification proposed to the paragraph in Policy RS 3 stating that planning permission will be granted [at Seafield (designated EW 1d on the Proposals Map) for a waste management facility incorporating thermal treatment with energy recovery]. This wording formulation is used for policies across the Plan. No policy should be taken out of context or used in isolation, and other policies in the Plan apply. The Edinburgh City Local Plan has a general statement to this effect in paragraph 1.13. The Council sees merit in adding a similar statement to paragraph 124 at the start of Part 2 of the Plan. No modification proposed. **(2088 Scottish Government)**

Policy RS 5 – Minerals

- No modification proposed, however, due to the extant permission and SDP Policy 4, the Council sees merit in this representation to include 'Craigiehall Quarry' in Policy RS 5 and in the Proposals Map. See separate but related representation to Issue 19. **(2480 Rosebery Estates Partnership)**
- The Coal Authority's representation to the Second Proposed Plan raises an issue

previously identified in its representation to the first Proposed Plan. It seeks in more specific terms greater protection for coal resources in the LDP. The Council notes that Scottish Planning Policy has been updated since then. However, the Council considers that there is no need for detailed reference to coal extraction in the policies of the Edinburgh LDP. There are not likely to be any applications for coal extraction in the plan period, and LDP para 285 makes adequate provision for any such proposals that may arise. Introducing a general requirement for prior extraction for non-mineral developments is not appropriate. Such measures may be feasible on a case-by-case basis. The Council notes that, in its response to FIR 07, the Coal Authority describes prior extraction as an option to be considered at the detailed stage, influenced by prevailing conditions. Accordingly, it would be disproportionate to establish a blanket requirement for prior extraction. To do so could present a constraint to relevant developments. In South East Edinburgh, these are likely to be for housing growth, a particular priority for this Plan period. A vaguer requirement to consider options would create uncertainty as the basis for deciding planning applications and so would be inappropriate in an LDP policy wording. No modification proposed. **(02723 The Coal Authority)**

Policy RS 7 – Telecommunications

- No change to the wording to include reference to cumulative impact is considered necessary in this instance as paragraph 288 makes it clear when the cumulative visual impact will be considered. No modification proposed. **(2126 Cockburn Association)**

Reporter's conclusions:

[NOTE: In its response to Further Information Request FIR 07 the council drew attention to 2 representations from The Coal Authority relating to policies Env 22 and RS 5 which for some reason it had not previously taken account of or reported in the Schedule 4s for Issues 22 and 24 respectively. In an attempt to rectify this the council in its FIR 07 response Appendix A has summarised the concerns expressed in those representations together with the modifications being sought in the representations and set out its response in each case. The council has provided revisions to the originally submitted schedule 4s to include those 2 representations from the Coal Authority. Those matters related to policy RS 5 are reflected in the updated version of this Schedule 4 above and I have considered these in my conclusions and recommendations below – and in Issue 22 a similar approach has been taken with regard to The Coal Authority's representations concerning policy Env 22.]

Transport Policies

1. Scottish Planning Policy (SPP) includes a section headed A Connected Place: Promoting Sustainable Transport and Active Travel and in paragraph 270 states a number of related policy principles. These include the planning system supporting patterns of development that: optimise the use of existing infrastructure; reduce the need to travel; provide safe and convenient opportunities for walking and cycling; and facilitate travel by public transport – as well as the integration of travel modes. The next paragraph states that development plans should take account of the implications of development proposals on traffic, patterns of travel and road safety. Under its related section on Development Planning the SPP states in paragraph 273 that plans should identify active travel networks and promote opportunities for more sustainable modes in the following

order of priority: walking, cycling, public transport, and finally through the use of private cars. Paragraph 279 of the SPP gives more specific policy guidance on "significant travel-generating uses – stating that these should be sited at locations where are well served by public transport, subject to parking restraint policies, and supported by measures to promote the availability of high quality public transport services.

2. Many of these and related principles set out in the SPP are endorsed in the SESplan section on Infrastructure, in particular in the terms of Policy 8 Transportation. It is in the context of these SPP and SESplan policies that I now consider the representations lodged with regard to policies Tra 1 and Tra 2 of the proposed plan and other matters.

Policy Tra 1 – Location of Major Travel Generating Developments

3. Whilst this policy is concerned with the location of major traffic generating developments, I note that its first criterion is specifically about ensuring that such development sites are accessible by transport modes other than cars. This point is expanded in the final sentence of the policy wording which states that the location proposed should be suitable with regard to access by public transport, cycling and walking. In order to reflect the prioritisation given in the SPP in paragraph 273 I conclude that the policy wording would be better re-phrased to change the order to state, walking, cycling and public transport – as being advocated in one of the representations. In this regard I do not find the council's arguments against this to be persuasive, as in my view the terms of paragraph 279 of the SPP are not intended to override those principles set out in its paragraph 273.

4. In the above context I am also persuaded by the suggested change to the final sentence of paragraph 258 to include cycling - as put forward in the same representation and in this case now endorsed by the council. In my view this would be logical and beneficial in demonstrating consistency with the SPP. Accordingly, I conclude that this change to the wording should be made when the plan is adopted. Nevertheless, for reasons of consistency within the policy wording, as articulated by the council, I conclude that it would not be appropriate to include a specific reference to town centres within the policy. I note that the issues relating to town centres being given priority are addressed elsewhere in this report through Issue 23 where an additional separate policy on this matter is recommended.

5. I am not persuaded by the suggestion put forward in another representation that specific mention should be made of educational establishments, hospitals and major park and ride facilities. This is because it is made clear at the outset in the supporting statement of paragraph 258 that the policy includes "other non-residential developments which generate a large number of journeys by employees and other visitors. I conclude, therefore, that it is not necessary to try and list all such possible types of development.

Policy Tra 2 - Private Car Parking

6. The representations seek changes to this policy, each in different ways, with the aims of improving residential amenity and air quality by imposing car parking restrictions and better regulation. Whilst I am supportive of the broad principles of the new plan seeking to enhance residential amenity and improve air quality in the plan area, I do not find the suggested changes to this policy as being justified or indeed the most appropriate means to achieve those objectives. As the council points out, the principle of setting lower levels of parking provision is only likely to be accepted and therefore effective in areas

where there are existing or planned on-street parking controls – as noted in paragraph 262 of the proposed plan. I am also satisfied that the air quality issues raised including with regard to cumulative impacts are already addressed by policy Env 22 of the plan. Accordingly, I conclude that there is insufficient justification to amend policy Tra 2 in the manner being sought by the representations.

Other Matters

7. I am satisfied that the matters related to access rights raised in one representation are already satisfactorily addressed in the proposed plan – notably in policies Tra 8 and Env 18, both of which have been carried forward essentially unaltered from the adopted plan. Furthermore, as the council points out, access rights are also secured and managed through other regulatory processes, not just through the planning system. Based on all of these considerations I conclude therefore that there is no justification to provide a new additional policy to address these particular concerns.

8. I am not persuaded that the concerns about speed limits expressed in 3 representations are most appropriately addressed through a modification to policy Tra 3. The council confirms that its own new initiatives to restrict speed limits to 20mph in residential and shopping streets is separate from planning policy and is being implemented instead through roads legislation. Whilst recognising the merits and benefits of such initiatives, in summary I conclude that it is neither appropriate nor necessary to pursue those matters through changes to policy Tra 9, when the desired outcomes are already being achieved through other existing legislation.

9. As policy Tra 11 is solely concerned with development proposals for sites within the Airport Public Safety Zones, I conclude that it is not necessary for me to explore further the representation concerning a specific site outwith those zones. As the council points out, any proposal for a replacement house on a site outwith those particular zones will be assessed on its particular merits - including having regard to all other relevant policies of the development plan.

Resources and Services Policies

Policy RS 1 Sustainable Energy

10. The first representation expresses concerns about the reference to green belts in the supporting statement of this policy (in paragraph 276), and would prefer the matter to be addressed instead through a cross-referral to policy Env 10. I am satisfied that the broad national policy principles on green belts set out in paragraphs 49-52 of the Scottish Planning Policy are echoed by the objectives of the Edinburgh Green Belt set out in Part 1 Section 2 of the proposed plan and in particular in policy Env 10 – as well as in SESplan. A more detailed assessment and conclusions in regard to these matters is set out elsewhere in this report under Issue 22. Meanwhile, the strict criteria specified for permitting particular types and forms of development in the green belt is set out in policy Env 10. As the council points out the policy wording (of policies RS1 and Env 10) does not totally rule out wind turbines in the green belt, provided that a proposal can meet the policy criteria of policies RS1 and Env 1. Based on all of these considerations, I conclude that it would be beneficial at the end of paragraph 276 of the proposed plan to also cross-refer to policy Env 10.

11. I am not persuaded that an additional criterion is required for policy RS1 in order to

ensure that aerodrome safeguarding is maintained. Instead I am in agreement with the council that elsewhere in the proposed plan – notably in policy Tra 11- there are already sufficient safeguards restricting developments on sites where the Airport Public Safety Zone applies. Accordingly, I conclude that no modification to the plan is justified.

12. I also do not find compelling the arguments put forward in other representations that argue that policy RS1 or its supporting statement in paragraph 278 should be modified to reflect the terms of a European Directive relating to biomass fuelled combined heat and power plants. I am satisfied that these requirements are already applied through the national provisions and in particular the 2020 Route map for Renewable Energy in Scotland. Accordingly, I conclude that it is neither necessary nor appropriate for this plan's policies to restate or cover matters controlled by separate regulatory regimes, so no modification to the proposed plan is merited in response to these particular representations.

13. Another representation argues that the plan through policy RS1 should actively support the development of heat networks, heat storage and energy centres wherever appropriate, including within new developments – or at least make reference to these and related matters being addressed in future supplementary guidance to be issued. I note that Scottish Planning Policy includes a section on delivering heat and electricity under the heading 'A Low Carbon Place'. This sets out a series of policy principles for the planning system aimed at a transitional change to a low carbon economy consistent with national objectives and targets. These include, amongst matters, supporting the development of a diverse range of electricity generation from renewable energy technologies as well reducing emissions and less energy use through improved efficiencies and heat recovery. Further details on delivery are provided in the SPP paragraphs 155-160 – including reference to local development plans using heat mapping to identify the potential for co-locating developments with high heat demand with sources of heat supply – and in paragraph 158 it gives examples of such heat supply sources.

14. In response, the council has drawn attention to the fact that support for these types of schemes and related networking initiatives is already stated in policy RS1 and in paragraph 278. Furthermore it points out that the plan also sets out related targets in Part 1 Section 2 and further endorsement in policy Des 6 and in its supporting paragraphs. It also highlights other related initiatives taking place outwith the plan itself, all of which have regard to the relevant terms of the Scottish Planning Policy. Based on all of these considerations I conclude that there is a need or justification for a modification to the terms of policy RS1 itself as the policy cannot include an exhaustive list of every form of energy saving technology or possible efficiency measure and these are likely to change over time in any event. Nevertheless, given the terms of paragraph 158 of the SPP I find that it is both necessary and appropriate for reference to be made in the plan to statutory Supplementary Guidance being prepared on these matters – to include details regarding the use of heat mapping to identify the potential for co-locating developments with sources of heat supply, as well as with regard to other related initiatives as highlighted in the representation. I conclude that appropriate reference to this should be added at the end of paragraph 278 of the plan in the following terms:

> 'Supplementary Guidance will be prepared regarding heat mapping and consideration of the potential to establish district heating and/or cooling networks and associated opportunities for heat storage and energy centres - as well as regarding how implementation of such initiatives could best be supported.'

15. I note the suggestion made in one representation that the phrasing of criterion a) of this policy should be amended to ensure proposals 'avoid damaging' the local environment rather than not causing significant adverse impact on the environment. I am satisfied, however, that the existing policy wording is clear in its meaning – allowing the planning authority some discretion to assess proposals on their merits taking into consideration the particular local circumstances. Accordingly, I conclude that there is insufficient justification to amend the wording to address the concerns raised in the representation.

16. I am satisfied that the first sentence of paragraph 276 is clear in its meaning and so does not require alterations in response to the representation lodged. This is because the opening sentence of that paragraph does not differentiate between single turbines or multiple turbine developments including wind farms - so applies to all turbine developments. Nevertheless I am persuaded that there is logic and merit in responding positively to the representation seeking amendments to the wording of the second sentence of paragraph 276 in order to make clear that this is intended to apply to individual as well as cumulative impacts. I note that this particular change has now been agreed by the council. Accordingly, I conclude that the second sentence of paragraph 276 should read as follows – with the remainder of that paragraph remaining unchanged: "… All wind turbine proposals will be assessed for their individual and cumulative effect on the landscape and biodiversity, taking account of other turbine proposals approved or proposed in the surrounding area. …"

Policy RS 3 Provision of New Waste Management Facilities

17. I note that Scottish Planning Policy (SPP) includes a section headed Planning for Zero Waste. After setting the context, including reference to the National Planning Framework 3 document, paragraph 176 of the SPP sets out a series of policy principles for the planning system with regard to waste management and recycling and makes reference to related key documents to be taken into consideration, including the revised EU Waste Framework Directive, the Waste (Scotland) Regulations 2012 and Scotland's Zero Waste Plan. It is in this context that I have considered the representations lodged.

18. Firstly, I am satisfied that the existing wording of policy RS 3 reflects the up to date national policy, as set out in the Zero Waste Plan for Scotland - and, as the council points out, this justified the detailed changes from the equivalent policy in the previous plan. I am also satisfied that the wording of policy RS 3 accords with the policy principles set out in the SPP paragraph 176 – and that this would not be the case if the suggested amendments to criteria b) and c) were made to the policy, as being put forward in a number of representations. I am persuaded by the 'counter' arguments put forward by the council – in summary, that whilst the policy wording generally supports the delivery of new waste management facilities at appropriate locations, the regulation of permitted installations remains the responsibility of the Scottish Environment Protection Agency.

19. Another representation seeks a change to the wording of the first sentence of the final paragraph of policy RS 3. Whilst supporting the safeguarding of Seafield it advocates removal of the reference to planning permission being granted. Despite the arguments to the contrary put forward by the council – that the existing wording reflects the standard approach to policy phrasing that has been adopted consistently throughout the proposed plan and all plan policies would apply - I am persuaded that there is justification for amending the opening phrase of the last paragraph of this policy in order to avoid pre-judging the outcome of the development management process. Accordingly,

I conclude that the opening phrase of the last paragraph of policy RS 3 should now read "Seafield is designated (EW 1d on the Proposals Map) for a waste management facility …" with the remainder of that paragraph (indeed the rest of the policy wording) all remaining unchanged. I note the observation made in another representation regarding the adequacy of the existing and planned provision of waste management facilities serving the area referred to – and in that context the support offered for safeguarding the site at Seafield for waste management facilities.

Policy RS 5 Minerals

20. One representation seeks an amendment to the policy wording to reflect the planning permission now in place at Craigiehall Quarry. In that context and given the terms of SESplan policy 4 - concerning the role of local development plans to safeguard mineral resources and identify areas of search for mineral extraction – I am persuaded that the policy wording should include reference to Craigiehall Quarry along with the other sites already listed and for this site to be shown on the Proposals Map. Accordingly, I conclude that the wording of policy RS 5 should be modified to read '...Bonnington Mains, Ravelrig and Craigiehall Quarry' together with Craigiehall Quarry also being shown on the Proposals Map.

21. Another representation – from The Coal Authority – is seeking an amendment to the policy wording with a view to safeguarding mineral resources, such as coal, from sterilisation. It argues that this approach would be in line with national policy set out in the Scottish Planning policy, drawing particular attention to paragraphs 234, 235 and 237 of the SPP.

22. The policy wording of RS 5 includes a provision to ensure that developments that would prevent or significantly constrain the potential to extract minerals from a number of identified mineral quarries shown on the Proposals Map. I note, however, that the supporting text in paragraph 284 makes clear a more general principle - the importance of protecting economically viable mineral deposits from sterilisation by permanent development. In my view that principle could and should be highlighted through a modification to the last sentence of the policy itself – and in my opinion this would address a key concern expressed in the representation. Accordingly, whilst I agree with the council that it would be inappropriate and disproportionate to require pre-extraction of any significant mineral resources prior to non-mineral developments on any given site, I conclude that the last sentence of policy RS 5 should be amended to read as follows:

"Development which would prevent or significantly constrain the potential to extract minerals from these or other sites with economically viable mineral deposits will not be allowed."

Policy RS 7 Telecommunications

23. There is one representation seeking an additional phrase to be inserted in this policy to address concerns about cumulative impacts. I find, however, in paragraph 288 of the proposed plan, that it is already made clear that consideration will be given to cumulative impacts when the policy is being applied. Accordingly, I conclude that there is insufficient justification to amend the policy wording to address the concern raised in the representation.

Reporter's recommendations:

Modify the proposed plan as follows:

1. Modify Policy Tra 1 (on page 112) by amending the last sentence to read '…with regard to access by walking, cycling and public transport and that…

2. Modify paragraph 258 by changing the final sentence to read '…catchment area by walking, cycling or frequent public transport services.'

3. Modify paragraph 276 by adding at its end the words … and policy Env 10.

4. Modify paragraph 276 by amending the second sentence to read as follows: "…All wind turbine proposals will be assessed for their individual and cumulative effect on the landscape and biodiversity, taking account of other turbine proposals approved or proposed in the surrounding area. …"

5. Modify paragraph 278 of the plan by inserting an additional sentence at the end to read as follows;

   Supplementary Guidance will be prepared regarding heat mapping and consideration of the potential to establish district heating and/or cooling networks and associated opportunities for heat storage and energy centres - as well as regarding how implementation of such initiatives could best be supported.

6. Modify policy RS 3 by amending the opening phrase of the last paragraph to now read "Seafield is designated (EW 1d on the Proposals Map) for a waste management facility …"

7. Modify policy RS 5 by amending the wording of the last part of the first sentence to read "...Bonnington Mains, Ravelrig and Craigiehall Quarry' – and show Craigiehall Quarry appropriately labelled on the Proposals Map.

8. Modify policy RS 5 by amending the wording of the second sentence to read: "Development which would prevent or significantly constrain the potential to extract minerals from these or other sites with economically viable mineral deposits will not be allowed."

Issue 24 Appendix A - Seeking change to Policy RS 3	
0286 Susan Martin 0339 Robert Todd 0345 Lou Leask 0362 Wendy Bain 0745 Celia Butterworth 1140 Diana Cairns 1345 Brock Lueck 1485 Brenda Molony 1487 Derek O'Carroll 1532 Catherine Maclean 1659 Victor Michel 1688 Pamela Carr 1727 Diana Dodd 1733 M Gary Dickson 1989 Peter Wraith 2003 Frances Wraith 2009 Ursula Wright 2031 John Stewart 2051 Fraser Clark 2522 James Hurford 2568 Stephen Hawkins 2647 Gillian Dunn 2654 Gordon McCulloch	

Issue 24 Appendix B – Seafield Waste Management	
0286 Susan Martin 0362 Wendy Bain 0745 Celia Butterworth 1140 Diana Cairns 1345 Brock Lueck 1485 Brenda Molony 1532 Catherine Maclean 1659 Victor Michel 1688 Pamela Carr 1727 Diana Dodd 1989 Peter Wraith 2003 Frances Wraith 2031 John Stewart 2388 Maeve Maclean 2522 James Hurford 2568 Stephen Hawkins	