

Planning Committee

10.00, Thursday, 14 May 2015

Local Development Plan: Submission to Examination

Item number 5.1
Report number
Executive/routine
Wards

Executive summary

The purpose of this report is to ask the Committee to agree to submit the Second Proposed Plan to Scottish Ministers for examination. This requires approval of a Summary of Unresolved Issues – the Council’s consideration of representations made to the Plan in 2014.

This is one of the last stages in the preparation of the Council’s first Local Development Plan. The plan is scheduled to be adopted in 2016 and will replace two local plans. It will be used to determine all planning applications.

The Second Proposed Plan has been informed by a major consultation stage in 2011/12 and a period for representations on the first Proposed Plan in 2013. A second set of representations, received from August to October 2014, seek changes to the Plan. However, for the reasons given in this report, there is not a need to modify the Plan. It can now be submitted to Scottish Ministers to initiate its examination. The examination can recommend binding changes to address matters raised in the representations, prior to the Plan’s adoption.

Links

Coalition pledges	P4 , P8 , P15 , P17 , P18
Council outcomes	CO7 , CO8 , CO16 , CO18 , CO19 , CO22 , CO23
Single Outcome Agreement	SO1 , SO2 , SO3 , SO4

Local Development Plan: Submission to Examination

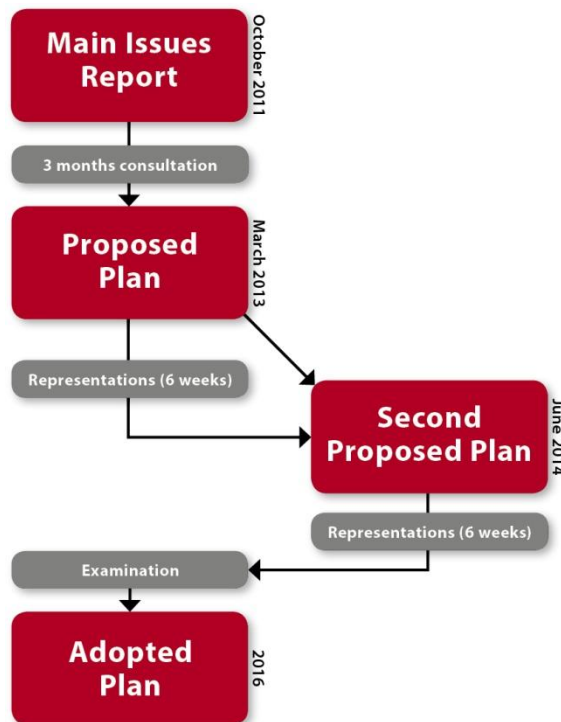
Recommendations

- 1.1 It is recommended that the Committee:
- 1) Approves the appended Summary of Unresolved Issues (Appendix 1) for submission to examination, subject to minor drafting and technical amendments.
 - 2) Authorises the submission of the Second Proposed Plan to Scottish Ministers for examination along with the representations themselves and background documents including an Environmental Report Addendum and a Report of Conformity showing participation measures undertaken.
 - 3) Approves the appended Development Plan Scheme (Appendix 2) and notes that it will be circulated to everyone who submitted representations.

Background

- 2.1 Edinburgh is a successful, growing city. That growth is driven by the city's assets, which include its citizens, its centres of employment and learning, and its quality of life. That growth needs to be guided and shaped in order to maintain and promote those assets and to deliver the Council's objectives. That is the purpose of development plans.
- 2.2 The Council is preparing its first [Local Development Plan](#) (LDP). Following a major consultation stage in 2011/12, the Council published a Proposed Plan in 2013. This received representations from 2,300 individuals and organisations. The issues raised in these representations were considered by the Council when it prepared and approved a Second Proposed Plan (19 June 2014).
- 2.3 This new version had been made necessary by changes to the Strategic Development Plan for South East Scotland ([SDP](#)) when that was approved by Scottish Ministers, and by the SDP Supplementary Guidance which followed. The changes meant that the LDP needed to provide more housing land. Doing so changed the spatial strategy of the LDP, which meant that the new version was a *Second* Proposed Plan.
- 2.4 The Second Proposed Plan was accompanied by various supporting documents, which are still relevant and are referred to as background documents.
- 2.5 The Committee's decision of 19 June 2014 included several instructions, which are addressed below.

2.6 This diagram explains the plan process in simplified form:



Main report

Publicity and Engagement

3.1 The Second Proposed Plan and its supporting documents were issued online and in hard copy in August 2014. The period for representations ran for six weeks from 22 August to 3 October 2014. The engagement process included:

- Notification to everyone who had responded at the first Proposed Plan or Main Issues Report stage.
- Neighbour notification in the way set out in legislation.
- Drop-in engagement sessions held in those areas where significant changes are proposed. Additionally, a more general session was held in the city centre. These aimed to help inform the general public about the Plan and how they could make representations if they wished.
- Providing summaries of the Plan's proposals by Neighbourhood Partnership area which were distributed to community councils.

3.2 Advance notice of this stage had been given:

- In the June 2014 Development Plan Scheme, circulated in July 2014.
- In briefings to community groups from November 2013 to April 2014. These aimed to alert community representatives to the potential for new housing proposals in their area.

- 3.3 Points 2 and 3 of the Committee's decision of 19 June 2014 (attached as Appendix 3) noted that all interested parties would be able to submit representations for the Committee to consider, and requested that everyone who made representations to the first Proposed Plan be informed that they needed to resubmit their representations and be offered any assistance that they may require.
- 3.4 This was carried out through:
- The notification referred to above.
 - Advice and information given in the drop-in engagement sessions and in response to queries.
 - Provision of bulk-printed representation forms on request.
- 3.5 The six drop-in engagement sessions were the main focus of staff resources. Feedback forms were used. These indicate a good turnout and that 67% of those giving feedback found the event 'good' or 'very good'.
- 3.6 A full account of how the engagement activities implemented the actions stated in the June 2014 Development Plan Scheme is given in a Report of Conformity with the Participation Statement, available as a background document and to be submitted to the LDP examination for scrutiny, as required by legislation.

Representations

- 3.7 Representations were received from around 2,500 individuals and organisations during the period for representations. These have been made available online at www.edinburgh.gov.uk/localdevelopmentplan.
- 3.8 They raise issues relating policies and proposals throughout the Second Proposed Plan. Most seek changes to the Plan. Almost all of these fall into one of the following categories:
- Seeking removal of a housing allocation.
 - Seeking addition of a housing allocation.
 - Seeking change to the policies of the Plan.
- 3.9 Some representations state support for the Plan as written. Most of these support current green belt and other designations in specific locations where communities are aware and concerned about pressure for further housing allocations.
- 3.10 The number of representations objecting to housing sites is set out in following table:

Housing Site	Reps (2013)	Reps (2014)
HSG19 Maybury (only)	67	61
HSG20 Cammo (only)	267	210
Maybury and Cammo	47	60
HSG21 Broomhills	489	67
HSG22 Burdiehouse	86	54
HSG23 Gilmerton Dykes Road (only)	34	25
HSG24 Gilmerton Station Road (only)	124	64
HSG25 The Drum (only)	70	49
HSG26 Newcraighall North	47	7
HSG27 Newcraighall East	49	13
HSG28 Ellen's Glen Road	-	38
HSG29 Brunstane	-	446
HSG30 Moredunvale	7	114
HSG31 Curriemuirend	493	784
HSG32 Builyeon Road	-	63
HSG33 South Scotstoun	-	72
Builyeon Road & South Scotstoun	-	40
HSG34 Dalmeny	-	41
Builyeon Road, South Scotstoun & Dalmeny	-	47
HSG35 Riccarton Mains Road	9	148
HSG36 Curriehill Road	-	165
HSG37 Newmills Road	-	205
Riccarton Mains Road, Curriehill Road & Newmills Road	-	54

Note: numbers given are for number of individuals or organisations who submitted a representation relating to each proposal or set of proposals.

- 3.11 A map showing the location of additional housing sites, suggested by developers and landowners outwith the urban area, has been made available with the representations at www.edinburgh.gov.uk/localdevelopmentplan.
- 3.12 As required by legislation, the representations seeking change have been grouped into the issues they raise. These are set out in Appendix 1 – Summary of Unresolved Issues.
- 3.13 This is arranged into 24 schedules of issues. For each issue there is:

- A summary of the issue as raised by the respondents, set out in several sections.
- The modifications sought by respondents.
- The Council's reasoning on the issue.
- Sections for the examination reporter's findings.

Issues

3.14 The 24 schedules in Appendix 1 follow the structure of the Second Proposed Plan and cover the issues as set out in the following table:

Issue 1	Introduction, Aims and Strategy
Issue 2	Green Belt and Special Landscape Areas
Issue 3	Other Environmental Designations
Issue 4	Economic Development and Shopping/Leisure Proposals
Issue 5	Housing and Community Facilities (including land supply matters)
Issue 6	Existing Housing Proposals
Issue 7	New Greenfield Housing Proposals – West Edinburgh Strategic Development Area (SDA)
Issue 8	New Greenfield Housing Proposals – SE Edinburgh SDA (1)
Issue 9	New Greenfield Housing Proposals – SE Edinburgh SDA (2)
Issue 10	New Greenfield Housing Proposals – SE Edinburgh SDA (3)
Issue 11	New Greenfield Housing Proposals – North West
Issue 12	New Greenfield Housing Proposals – South West
Issue 13	New Urban Area Housing Proposals
Issue 14	Suggested Housing Sites Outwith the Urban Area – West and South East SDAs
Issue 15	Suggested Housing Sites Outwith the Urban Area – North West
Issue 16	Suggested Housing Sites Outwith the Urban Area – South West
Issue 17	Suggested Sites Outwith the Urban Area - Elsewhere
Issue 18	Suggested Housing Sites in Urban Area
Issue 19	Transport and Resources Proposals
Issue 20	Strategic Development Areas – Other matters
Issue 21	Developer Contributions Policies
Issue 22	Design and Environment Policies
Issue 23	Employment, Housing and Shopping Policies
Issue 24	Transport and Resources Policies

3.15 It is recommended that the Committee decides to make no modifications in response to these representations but instead moves the Plan on to the examination stage during which unresolved issues will be considered. The reasoning for this is set out for each issue in Appendix 1 and the procedures are explained below.

3.16 In summary, the Second Proposed Plan is consistent with the SDP and its Supplementary Guidance, is compatible with national policy and modifications are not required. The reasoning in Appendix 1 makes reference to evidence. Much of this is set out in the Council's supporting documents published in June 2014 or with earlier stages of the project, including the following:

- Environmental Report – Second Revision.

- Second Proposed Action Programme.
 - Transport Appraisal.
 - Education Appraisal.
 - Housing Land Study.
 - Schedule of Representations.
 - Monitoring Statement.
- 3.17 Where developers and landowners have submitted housing sites which were not previously assessed in the Environmental Report, these sites have been assessed in an Environmental Report Addendum. This is available as a background document.
- 3.18 These and other relevant evidence will be submitted to the examination.
- 3.19 The Committee is asked to approve Appendix 1 for submission to Scottish Ministers, subject to minor drafting or technical amendments. To do so is consistent with Scottish Government advice set out in [Circular 6/2013](#), in particular paragraph 87:
- “From the Proposed Plan stage, Scottish Ministers expect an authority’s priority to be to progress to adoption as quickly as possible. Pre-Examination negotiations and notifiable modifications can cause significant delay and so should not be undertaken as a matter of course, but only where the authority is minded to make significant changes to the plan. However, if authorities do wish to support a significant change to the plan, this should be done by pre-Examination modification, as set out in paragraph 86 (3) above. The Examination also provides an opportunity to change the plan, so if authorities see merit in a representation they may say so in their response to the reporter, and leave them to make appropriate recommendations.”*
- 3.20 It should be noted from the last sentence that the Committee can suggest, to the examination reporter, where a matter could be resolved by a change to the Plan. Appendix 1 generally uses this for wording changes which would improve the accuracy or clarity of the Plan or to suggest changes which could help address an issue without significantly altering the Plan’s land designations or strategy. In each case, the Committee’s response does not amount to a decision to modify the Plan, and remains consistent with the evidence used and the responses to other issues.
- 3.21 Alternatively, if the Committee were to decide to modify the Plan, it could not then be submitted to examination, and would need to be published for a new period for representations. This would last for a minimum of 6 weeks and would need to be preceded by a new Development Plan Scheme with a Participation Statement stating what engagement activities the Council was going to carry out. The representations received would need to be reported for consideration in the same manner as the present report, prior to submission to examination.

This, however, would delay the progress of the Plan towards adoption, contrary to the expectation referred to above, and the Council's duty to prepare a local development plan as quickly as practicable.

Development Plan Scheme

3.22 Following Committee approval of Appendix 1, the next steps in the process are to:

- Publish the LDP and submit it with all documents to Scottish Ministers with a request to appoint a reporter.
- When the reporters are appointed, notify all those who made representations.
- Await the report of examination in 6 to 9 months, and potentially respond to any requests for further information or hearing session(s) from the reporter.
- On receipt of the report, make any modifications it recommends (which are largely binding on the Council) and notify all those who made representations to the Second Proposed Plan.
- Adopt it in that modified form.

3.23 The procedures and principles are explained more fully in [Circular 6/2013](#). It should be noted that the Examination Reporter may make recommendations to modify the Plan. Only in limited circumstances can the Council decline to accept such modifications prior to the adoption of the Plan.

3.24 It is intended to include in the notification mailshot an updated Development Plan Scheme. This aims to explain the next steps of the process to everyone who submitted representations, and to direct them to where they can keep track of the examination. This will be the website of the Directorate for Planning and Environmental Appeals, which will run the examination.

3.25 The new Development Plan Scheme is attached as Appendix 2 for approval.

Other matters in Committee decision of 19 June 2014

3.26 The Planning Committee's decision of 19 June 2014 is included in the [Minutes](#) of that meeting, attached as Appendix 3 (see pages 5-6 for decision).

3.27 Points 2 and 3 of the Committee's decision are addressed in the Publicity and Engagement section above.

3.28 Point 4 and 7 (prematurity and infrastructure provision) relate to the consideration of planning applications in the development management process.

3.29 Point 10 (Granton Waterfront) was incorporated into the published Second Proposed Plan.

3.30 Points 7, 8 and 9 (infrastructure, brownfield priority and densities) have been taken into account in the relevant sections of Appendix 1. In particular, Issue 5

covers minimisation of use of greenfield land, and Issue 21 addresses infrastructure provision.

3.31 Points 5 and 6 instructed the Acting Head of Planning and Building Standards to reassess an area of land identified in the Environmental Report as 'East of Millburn Tower' and to report back on the transport and education infrastructure requirements for that potential site.

3.32 This has been carried out as follows:

- Before commissioning a transport appraisal and carrying out an education appraisal, the notional capacity of the site had to be identified. Because the site includes the Gogar Burn watercourse and an area of medium to high flood risk, strategic and detailed flood risk assessments were requested from the land's promoters. This work was carried out as requested. It identified that the flood risk could be managed, potentially by creating a diversion channel for the watercourse, thereby increasing the developable area to 44ha.
- Using the same density range assumptions as the LDP housing sites (25-35 dwellings per hectare) and assuming no land safeguard for a school or landscape buffer, this site could accommodate 1,100 – 1,540 housing units, with a midpoint of 1,320 units.
- A transport appraisal was carried out using this notional midpoint capacity. This was done by the same consultants as the LDP Transport Appraisal. It is available as a background document. It identifies the need for a number of transport infrastructure interventions. In order to achieve adequate public transport penetration of the site, a new bus-capable route would need to be formed, potentially crossing over or under the city's bypass. A new pedestrian/cycle bridge over the bypass would also be required, among other measures to facilitate connectivity.
- An education infrastructure appraisal has been carried out. It is available as a background document. It uses the same approach as the appraisal of the Second Proposed Plan in 2014. It finds that there is a requirement for:
 - A new non-denominational primary.
 - Expansion of capacity in non-denominational secondary, potentially with catchment review.
 - Extensions to the relevant denominational primary and secondary.

The land required for a primary school (2 hectare) would reduce the capacity of the site by 50 units to 1,490.

3.33 Representations from the land's promoter were received and are summarised in Appendix 1 (pages 238 - 239 in bottom right numbering). The section dealing with Issue 14 sets out the reasoning for why the site should not be released from

the green belt and allocated for housing (pages 244 - 248 in bottom right numbering).

Measures of success

- 4.1 The growth of the city is guided and shaped in a way which maintains and promotes the assets which drive Edinburgh's success and which delivers the Council's objectives.
- 4.2 The Council maintains up-to-date development plan coverage.
- 4.3 Stakeholders are kept well informed of opportunities to be involved in the LDP process.

Financial impact

- 5.1 The recommendations of this report will lead to the commencement of the examination of the LDP. The costs of this are recovered from the Council. The average cost of an LDP examination as indicated by the Directorate of Planning and Environmental Appeals is £49,000. This has been identified as a budget pressure for the Planning and Building Standards service for 2015/16.
- 5.2 This report recommends that the Council decides to make no modifications to the Plan. Accordingly, there should be no significant additional costs associated with printing documents, statutory notification or engagement processes.
- 5.3 It also means that there is not a direct requirement to revise any of the supporting documents. They include the Proposed Action Programme, which sets out indicative costs for actions to deliver the policies and proposals in the Plan. As reported previously (Report to Planning Committee, [2 October 2014](#), Report to Corporate Policy and Strategy Committee, [4 December 2012](#)), some actions will cost more than developer contributions can fully cover, leading to funding gaps with financial implications for the Council and others. In addition, there will be significant additional revenue costs arising from the new infrastructure required to support the housing in the LDP for which no provision currently exists in the Council long term financial plan and for which developer contributions cannot be sought. The Action Programme is the subject of separate governance and reporting processes. Future versions of the Action Programme will identify any capital and revenue financial impacts accordingly and report these to Finance and Resources Committee. An update to the Action Programme is the subject of a separate report.

Risk, policy, compliance and governance impact

- 6.1 Preparing an LDP is a statutory process in which the risk of failure to comply with relevant legislation needs to be managed. It is also an activity for which national policy exists and needs to be taken into account.
- 6.2 The Second Proposed Plan resulted from modifications to achieve conformity with the approved Strategic Development Plan and its Supplementary Guidance, as required by the Town and Country Planning (Scotland) Act 1997.
- 6.3 The modifications resulted in changes to the underlying spatial strategy of the LDP. Accordingly, it constituted a new Proposed Plan, rather than a Modified Plan. This resulted in particular requirements in terms of submission of representations, which were stated when notification of the Plan was carried out.
- 6.4 Planning legislation requires that LDPs include a schedule of Council ownership for sites affected by provisions of the plan relating to development. An updated schedule was included in the published version of the Second Proposed Plan. These included reference to the additional housing allocation at Brunstane, which is owned by the EDI Group and hence the Council. This matter has been raised in some representations, however for the reasons given in Appendix 1, it is appropriate to not modify the Plan.
- 6.5 Strategic Environmental Assessment legislation requires that a LDP be accompanied by an Environmental Report identifying the likely significant environmental effects of the plan, for example on biodiversity, air quality, soil quality etc. The Environmental Report – Second Revision carried this out for the Second Proposed Plan. The present report recommends that no modifications be made to the Plan. Accordingly, there is not a need to update the SEA section of the Environmental Report. An Addendum to the Environmental Report provides an assessment of land newly promoted in representations - this covers matters beyond SEA statutory requirements.
- 6.6 The Flood Risk Management (Scotland) Act 2009 places a general duty on local authorities to reduce flood risk. The Second Proposed Plan does so by avoiding known areas of fluvial flood risk for new development and through relevant policy measures.
- 6.7 The intended corporate role of the LDP action programme has led to new governance arrangements which are the subject of a separate report.

Equalities impact

- 7.1 An Equalities and Rights Impact Assessment has been carried out for the LDP. Its findings were summarised in the report for the first Proposed Plan (19 March 2013). The report of the assessment was updated with the Second Proposed Plan and is available on the Plan's webpage.

- 7.2 Because this report recommends that no modifications be made to the Plan, there is not a significantly different impact in terms of equalities and rights.

Sustainability impact

- 8.1 The impacts of this report in relation to the three elements of the Climate Change (Scotland) Act 2009 Public Bodies Duties have been considered, and the outcomes summarised below. Relevant Council sustainable development policies have been taken into account.
- The proposals in this report will reduce carbon emissions because the Second Proposed LDP includes policies which require new development to reduce its carbon emissions.
 - The proposals in this report will increase the city's resilience to climate change impacts because the Second Proposed Plan includes policies which manage flood risk and require new development to incorporate adaptations to the impact of climate change.
 - The proposals in this report will help achieve a sustainable Edinburgh because it is one of the stated aims of the Second Proposed Plan to help create strong, sustainable communities, enabling all residents to enjoy a high quality of life. The Second Proposed LDP itself (available at www.edinburgh.gov.uk/localdevelopmentplan) explains how in more detail.
 - The proposals in this report will help achieve a sustainable Edinburgh because it is one of the stated aims of the Second Proposed Plan to support the growth of the city economy. The Second Proposed Plan itself explains how in more detail.
 - The proposals in this report will help achieve a sustainable Edinburgh because the Second Proposed Plan includes policies which require new development to reduce resource use, protect and enhance biodiversity and which support the national Zero Waste Plan's objectives.

The LDP is also the subject of a statutory Strategic Environmental Assessment process and a Habitats Regulation Appraisal. Both are available as background documents.

Consultation and engagement

- 9.1 The main LDP consultation process was carried out in late 2011 / early 2012 at the Main Issues Report stage (see 3rd appendix to report to Planning Committee, 19 March 2013). The findings informed the first Proposed Plan and the Second Proposed Plan. Representations to the first version were taken into account in the preparation of the Second Proposed Plan.

- 9.2 Paragraphs 3.1 to 3.6 above explain the publicity and engagement process for the Second Proposed Plan. Further information is given in the Report of Conformity with the Participation Statement which is available as a background document.
- 9.3 The partner organisations which have a statutory role in the preparation of an LDP are defined as Key Agencies. They are:
- NHS Lothian
 - Scottish Enterprise
 - Scottish Environment Protection Agency
 - Scottish Natural Heritage
 - Historic Scotland
 - Transport Scotland
 - SEStran
 - Forestry Commission.

Background reading/external references

LDP: Action Programme Update, Report to Planning Committee, [2 October 2014](#)

LDP: Second Proposed Plan, Report to Planning Committee, [19 June 2014](#)

(project documents and map available at www.edinburgh.gov.uk/localdevelopmentplan)

Strategic Development Plan Supplementary Guidance on Housing Land, reports to Planning Committee, [15 May 2014](#) and [23 October 2013](#)

LDP Development Plan Scheme, Report to Planning Committee, [23 October 2013](#).

LDP Update, Report to Planning Committee, [3 October 2013](#)

LDP – Proposed Plan – Report to Planning Committee, [19 March 2013](#)

LDP – Aims and Delivery, Report to Corporate Policy and Strategy Committee ([4 December 2012](#))

LDP [Main Issues Report](#) (October 2011)

[Circular 6/2013 – Development Planning](#), Scottish Government

John Bury

Acting Director of Services for Communities

Contact: Ben Wilson, Team Manager

E-mail: ben.wilson@edinburgh.gov.uk | Tel: 0131 469 3411

Links

Coalition pledges	<p>P4 Draw up a long-term strategic plan to tackle both over-crowding and under use in schools</p> <p>P8 Make sure the city's people are well-housed, including encouraging developers to built residential communities, starting with brownfield sites</p> <p>P15 Work with public organisations, the private sector and social enterprise to promote Edinburgh to investors</p> <p>P17 Continue efforts to develop the city's gap sites and encourage regeneration</p> <p>P18 Complete the tram project in accordance with current plans</p>
Council outcomes	<p>CO7 Edinburgh draws in new investment in development and regeneration</p> <p>CO8 Edinburgh's economy creates and sustains job opportunities</p> <p>CO16 Well-housed – People live in a good quality home that is affordable and meets their needs in a well-managed neighbourhood</p> <p>CO18 Green – We reduce the local environmental impact of our consumption and production</p> <p>CO19 Attractive Places and Well Maintained – Edinburgh remains an attractive city through the development of high quality buildings and places and the delivery of high standards and maintenance of infrastructure and public realm</p> <p>CO22 Moving efficiently – Edinburgh has transport system that improves connectivity and is green, healthy and accessible</p> <p>CO23 Well engaged and well informed – Communities and individuals are empowered and supported to improve local outcomes and foster a sense of community</p>
Single Outcome Agreement	<p>SO1 Edinburgh's economy delivers increased investment, jobs and opportunities for all</p> <p>SO2 Edinburgh's citizens experience improved health and wellbeing, with reduced inequalities in health</p> <p>SO3 Edinburgh's children and young people enjoy their childhood and fulfil their potential</p> <p>SO4 Edinburgh's communities are safer and have improved physical and social fabric</p>
Appendices	<p>Appendix 1 – Summary of Unresolved Issues</p> <p>Appendix 2 – Development Plan Scheme – May 2015</p> <p>Appendix 3 – Minutes of Planning Committee meeting, 19 June 2014</p>

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Additional Background Documents

Environmental Report Addendum (May 2015)

Report of Conformity with Participation Statement (May 2015)

East of Millburn Tower – Transport Appraisal

Education Infrastructure Appraisal

Further Background Documents from June 2014 available at
www.edinburgh.gov.uk/localdevelopmentplan

Local Development Plan – Submission to Examination

Planning Committee

14 May 2015

Appendix 1 - Summary of Unresolved Issues

Contents

Issue 1	Introduction, Aims and Strategy	2-10
Issue 2	Green Belt and Special Landscape Areas	11-29
Issue 3	Other Environmental Designations	30-46
Issue 4	Economic Development and Shopping/Leisure Proposals	47-60
Issue 5	Housing and Community Facilities (including land supply matters)	61-89
Issue 6	Existing Housing Proposals	90-98
Issue 7	New Greenfield Housing Proposals – West Edinburgh Strategic Development Area (SDA)	99-123
Issue 8	New Greenfield Housing Proposals – SE Edinburgh SDA (1)	124-137
Issue 9	New Greenfield Housing Proposals – SE Edinburgh SDA (2)	138-155
Issue 10	New Greenfield Housing Proposals – SE Edinburgh SDA (3)	156-173
Issue 11	New Greenfield Housing Proposals – North West	174-202
Issue 12	New Greenfield Housing Proposals – South West	203-218
Issue 13	New Urban Area Housing Proposals	219-237
Issue 14	Suggested Housing Sites Outwith the Urban Area – West and South East SDAs	238-260
Issue 15	Suggested Housing Sites Outwith the Urban Area – North West	261-267
Issue 16	Suggested Housing Sites Outwith the Urban Area – South West	268-295
Issue 17	Suggested Sites Outwith the Urban Area - Elsewhere	296-308
Issue 18	Suggested Housing Sites in Urban Area	309-313
Issue 19	Transport and Resources Proposals	314-330
Issue 20	Strategic Development Areas – Other matters	331-367
Issue 21	Developer Contributions Policies	368-376
Issue 22	Design and Environment Policies	377-403
Issue 23	Employment, Housing and Shopping Policies	404-436
Issue 24	Transport and Resources Policies	437-447
Appendices:		
Issue 3 Appendix A & B – list individuals who made representations grouped together in the Schedule.		
Issue 5 Appendix A, B & C – information relating to housing issues		
Issue 7 Appendix A, B & C – list individuals who made representations grouped together in the Schedule.		
Issue 8 Appendix A & B – list individuals who made representations grouped together in the Schedule.		
Issue 9 Appendix A, B & C – list individuals who made representations grouped together in the Schedule.		
Issue 10 Appendix A – list individuals who made representations grouped together in the Schedule.		
Issue 11 Appendix A, B, C, D & E – list individuals who made representations grouped together in the Schedule.		
Issue 12 Appendix A, B, C & D – list individuals who made representations grouped together in the Schedule.		
Issue 13 Appendix A, B & C – list individuals who made representations grouped together in the Schedule.		
Issue 17 Appendix A & B – list individuals who made representations grouped together in the Schedule.		
Issue 18 Appendix A – list individuals who made representations grouped together in the Schedule.		
Issue 20 Appendix A – Waterfront extract from Housing Land Study		
Issue 24 Appendix A & B – list individuals who made representations grouped together in the Schedule.		

Issue 1	Introduction and Aims and Strategy	
Development plan reference:	Part 1 Section 1 Figure 1	Reporter:
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):		
<p>CONTEXT</p> <p>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.</p> <p><u>National Planning Framework 3 / Scottish Planning Policy</u></p> <ul style="list-style-type: none"> • 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, Crawford 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 leading 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 Figure 1 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, Crawford 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:

Reporter's recommendations:

Issue 2	Green Belt and Special Landscape Areas	
Development plan reference:	Part 1 Section 2 pages 9 – 17 Proposals Map	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
0083 Martin White	2189 Currie Community Council	
0224 Beechmount Limited	2201 Peter Hawkins	
0244 Tony Gray	2244 Blackford Hill Limited	
0321 Ratho & District Community Council	2250 Mr & Mrs Love	
0624 South West (Edinburgh) Communities Forum	2275 Murray Estates	
0641 Cammo Residents Association	2276 Gladman Developments Ltd	
0698 David Wilson Homes and J & J Muir	2279 Hallam Land Management Ltd	
0799 NHS Lothian Public Health & Health Policy	2280 Mr and Mrs Philip and Barratt David Wilson Homes	
0836 Heriot-Watt University	2317 Edinburgh Napier University	
1124 Liberton Association	2408 HolderPlanning	
1149 Castle Craig Investments Ltd.	2421 SEEDco	
1154 CALA Management Ltd	2476 Mr R Purves	
1155 Trustees of the Foxhall Trust	2559 Norton Farm Consortium	
1170 A J C Clark	2563 Royal Zoological Society of Scotland	
1202 Land Options East	2572 Royal Bank of Scotland	
1463 Boland Scottish Properties Ltd	2595 Grant Wilson	
2085 A&D Brewster	2596 Christine Wilson	
2086 Persimmon Homes (East Scotland)	2693 Spire Healthcare Ltd	
2088 Scottish Government	2703 Ogilvie Homes	
2119 Colinton Country Cattery	2706 Juniper Green Community Council	
2126 Cockburn Association		
2131 Lafarge Tarmac		
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		
<p>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.</p>		

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)**

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; 1155 Trustees of the Foxhall Trust)**
- 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 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)**

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 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. **(2465 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 Gogarbark 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 Craigmock 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 Craigmockhart to cover entire extent of the University's ownership at Craigmockhart. Object to extension of Special Landscape Area at Craigmockhart 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)**

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; 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. **(2465 SEEDco)**
- Amend the green belt boundary to exclude Beechmont House, and grounds at 102 Corstorphine Road. Consider that Beechmont 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 Beechmont 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)**

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; 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. **(2465 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)**

Gogarburn

- 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)**

Other request to add to urban area

- 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 suitably 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:**Reporter's recommendations:**

Issue 3	Other Environmental Designations	
Development plan reference:	Part 1 Section 2 pages 9 – 17 Glossary	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
0003 Steuart Campbell 0124 sportscotland 0165 Ken Shade 0170 Balerno Community Council 0225 Cramond & Barnton Community Council 0480 Currie East Neighbourhood Watch 0799 NHS Lothian Public Health & Health Policy 1124 Liberton Association 1154 CALA Management Ltd 1159 New Ingliston Limited 1342 Iain Proudfoot 1351 Friends of Cammo 1743 Thistle Timbers 1973 Morningside Community Council	2119 Colinton Country Cattery 2126 Cockburn Association 2192 Edinburgh Bioquarter Partners 2246 Mactaggart & Mickel Homes 2297 Friends of Craighouse 2402 West Craigs Ltd 2463 Euan Leitch 2567 Scottish Natural Heritage 2572 Royal Bank of Scotland 2683 Scottish Enterprise 2693 Spire Healthcare Ltd 2697 Scottish Natural Heritage 2699 Scottish Environment Protection Agency 2715 Merchiston Community Council	47 individuals submitted representations on 'Seven Hills' (See Issue 3 Appendix A) 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		
<p>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.</p> <p>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</p>		

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 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. **(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 Stuart 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 Craigmack 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)**

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 it 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 Craiggrook 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. Other objections lodged by CALA Management Ltd seek a residential allocation on the Craiggrook Road site. It is stated that two open space benefits will arise from the development – public access and new public open space along the frontage with Craiggrook 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; 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)**

Miscellaneous

- 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)**

Glossary

- 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 Stuart 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)**

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; 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 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'. **(2126 Cockburn Association)**

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 Stuart 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)**

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 Craigmillar 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; 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 Edinburgh 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)**

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:

Reporter's recommendations:

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:
Body or person(s) submitting a representation raising the issue (including reference number):		
0088 Malcolm Cubb 0190 Ediston Properties Ltd & West Register 0388 Pauline Cowan 0698 David Wilson Homes and J & J Muir 0838 Gibraltar General Partner Ltd 1048 Swanston Farms Ltd 1124 Liberton Association 1146 Amber Real Estate 1159 New Ingliston Limited 1726 Marchmont & Sciennes Community Council 1964 The Grange Association 2085 A & D Brewster 2086 Persimmon Homes (East Scotland)	2088 Scottish Government 2093 Aldi Stores Ltd 2126 Cockburn Association 2192 Edinburgh BioQuarter Partners 2268 TIAA Henderson Real Estates 2271 Vita Edinburgh 1 Limited 2324 Fairmilehead Community Council 2346 Ocean Terminal Ltd 2354 Grange/Prestonfield Community Council 2536 Parc Craigmillar Ltd 2572 Royal Bank of Scotland 2699 Scottish Environment Protection Agency	
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):		
<p>CONTEXT</p> <p>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.</p> <p>ECONOMIC DEVELOPMENT</p> <p><u>General</u></p> <ul style="list-style-type: none"> 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)**

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. 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)**

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

- 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 area 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 Oxfgangs 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 Oxfgangs 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)**

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. **(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)**

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. **(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 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 Oxfangs 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 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:

Reporter's recommendations:

Issue 5	Housing and Community Facilities General	
Development plan reference:	Part 3 Section 2 pages 20 - 28	Reporter:
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 Craighleith/Blackhall Community Council	2277 Hallam Land Management Ltd	
0624 South West (Edinburgh) Communities Forum	2278 Stewart Milne Homes	
0649 Helen Campbell	2279 Hallam Land Management Ltd	
0652 Margaret Collins	2280 Mr and Mrs Philip and Barratt David Wilson Homes	
0698 David Wilson Homes and J & J Muir	2281 Wallace Land Investment and Management	
0749 Cramond and Harthill Estate	2290 Edinburgh Developers' Group (Edinburgh Chamber of Commerce)	
0755 BDW Trading Ltd	2291 Defence Infrastructure Organisation	
0799 NHS Lothian Public Health & Health Policy	2297 Friends of Craighouse	
1124 Liberton Association	2354 Grange/Prestonfield Community Council	
1133 Danzan 2003 Trust	2408 HolderPlanning	
1154 CALA Management Ltd	2416 Miller Homes Ltd	
1159 New Ingliston Limited	2421 SEEDco	
1170 A J C Clark	2497 Grosvenor	
1202 Land Options East	2534 Pam Barnes	
1726 Marchmont & Sciennes Community Council	2582 Sergey Gorobets	
2086 Persimmon Homes East Scotland	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 Craighleith/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 Craighleith/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 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 deprives 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)**

Meeting the Housing Land Supply Target

- 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)**

5-year Effective Housing Land Supply

- 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)**

Housing Land Study

- 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 Craigeith/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)**

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 into 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 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 Requirement			
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)**

5-year effective Land Supply

- 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)**

Housing Land Study

- 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 Craighleith/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 identifies 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 26 February 2015 addresses the requirements of the Capital Coalition Motion. 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)**

Greenfield/brownfield

- 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)**

Meeting the Housing Land Supply Target

- 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.

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.

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 since March 2014. Appendix A, Tables 4 – 6 of this form provides details of these sites. It is not considered necessary to reduce the contribution of constrained sites to the housing land supply.

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.

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

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.

	2009-2019	2019-2024	2009-2024
Setting the LDP Housing Land Requirement			
The City of Edinburgh Council Housing Land Requirement	22,300	7,210	29,510
10% to ensure a generous supply	2,230	721	2,950
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. It would also give rise to major further infrastructure actions which would likely require some level of public funding for which resources are unlikely to be available.

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)**

5-year effective land supply

- 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:

Reporter's recommendations:

Issue 6	Existing Housing Proposals	
Development plan reference:	Part 1 Section 3 Table 3 pages 22- 25 Proposals Map	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>0364 Craigeith/Blackhall Community Council</p> <p>0434 Miriam Prais</p> <p>0495 David Donnelly</p> <p>0552 Tony Jones</p> <p>0553 Pat Jones</p> <p>0631 Ann Morrison</p> <p>0716 Denise Havard</p> <p>0717 Lindsay Agnew</p> <p>1098 Barbara Mathieson</p> <p>1121 Bill Douglas</p>	<p>1501 British Airways PLC</p> <p>2086 Persimmon Homes (East Scotland)</p> <p>2249 D Buntin</p> <p>2536 Parc Craigmillar Ltd</p> <p>2551 Ken Kirkcaldy</p> <p>2563 Royal Zoological Society of Scotland</p> <p>2658 J S Dogra</p> <p>2694 R J Knops</p> <p>2699 Scottish Environment Protection Agency</p>	
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 HSG1 – HSG18 in Table 3 of the Plan.	
Planning authority’s summary of the representation(s):		
<p>CONTEXT</p> <p>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.</p> <p><u>HSG 1 Springfield & HSG 2 Agilent</u></p> <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> • 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 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 to 150-200 and address parking issues at Dalmeny Station. **(0495 David 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 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 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 to 150-200 and address parking issues at Dalmeny Station for commuters. **(0495 David 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 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 1 of 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 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)**

HSG 1 Springfield - Other Matters

- '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 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 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:

Reporter's recommendations:

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:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>47 individuals seeking removal of HSG 19 Maybury (see Issue 7 Appendix A)</p> <p>180 individuals seeking removal of HSG 20 Cammo (see Issue 7 Appendix B)</p> <p>41 individuals seeking removal of HSG 19 & 20 (see Issue 7 Appendix C)</p> <p>Organisations, elected representatives and individuals other than those in Appendices A, B and C</p> <p>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</p>	<p>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</p>	
Provision of the development plan to which the issue	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	

relates:	Edinburgh.
Planning authority's summary of the representation(s):	
<p>CONTEXT</p> <p>The Main Issues Report consulted on the housing site options in West Edinburgh, see question two, page 13:</p> <ul style="list-style-type: none"> • HSG 19 Maybury was consulted on as one of the preferred options; • HSG 20 Cammo was presented as a reasonable alternative. <p>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.</p> <p><u>Representations seeking removal of HSG 19 Maybury</u></p> <p>Seek removal of HSG 19 on the grounds of one or more of the reasons listed below:</p> <ul style="list-style-type: none"> • 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. <p>(2130 Colin Keir MSP and 47 individuals listed in Issue 7 - Appendix A)</p> <p><u>Representations opposed to HSG 19 Maybury in current form and seeking its removal and/or change</u></p>	

- 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. 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

Supports allocation of HSG 19

- 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 180 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; 2115 Lynne Young**)
- 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**) Edinburgh Park (**0637 Gary Bennett**)
- 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 to 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)**

Supports Allocation of HSG 20

- Supports allocation of HSG20. **(0749 Cramond and Harthill Estate)**

Representations seeking removal of HSG 19 Maybury & 19 Cammo

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; 2126 Cockburn Association; and 41 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. **(186 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 states that height restrictions will reduce impact on views from Maybury and Cammo and no building should be higher than the existing properties. 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, which not located within the Public Safety Zone they remain in close proximity to the Airport. BA 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)**

Representations seeking removal of HSG 20 Cammo

- 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 180 individuals listed in Issue 7 - Appendix B)**

Representations opposed to HSG 20 Cammo in current form and seeking its removal and/or change

- 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; 2115 Lynne Young)**
- 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)** Edinburgh Park. **(0637 Gary Bennett)**
- 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 Vettrano)**
- 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)**

Representations seeking removal of HSG 19 Maybury & HSG 20 Cammo

- Remove proposals from the Plan. **(1986 East Craigs Wider Action Group; Corstorphine Community Council; 2126 Cockburn Association and 41 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

- 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)**
- Remove proposal from the Plan, however if it remains, no building should be higher than the existing properties. **(0309 Mr & Mrs Mackenzie)**
- 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)**

Representations opposed to SCH 6 Maybury in current form and seeking its removal and/or change

- 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:

Site Selection - HSG 19 Maybury and HSG 20 Cammo

- 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

- **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);**

Representations opposed to HSG 19 Maybury in current form and seeking its removal and/or change

- 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)**

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.

HSG 20 Cammo. (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)**. 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 Bughtlin Burn’ is requested to address the advice of Scottish environmental 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)**

Representations seeking removal of HSG 19 and HSG 20

- 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:
Reporter's recommendations:

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:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>54 individuals seeking removal of HSG 21 Broomhills (see Issue 8 Appendix A)</p> <p>37 individuals seeking removal of HSG 22 Burdiehouse (see Issue 8 Appendix B)</p> <p>Organisations, elected representatives and individuals other than those in Appendices A and B</p> <p>0054 Colin Kemp 0056 Joyce Kemp 0104 Karen Howe 0244 Tony Gray 0358 Gilmerton Inch Community Council 0535 Lynda Ardern 0741 Norma Austin Hart 0755 BDW Trading Ltd 1057 George Wood</p>	<p>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 2696 Iain Michie</p>	
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):		
<p>CONTEXT</p> <p>The Main Issues Report consulted on the housing site options in South East Edinburgh, see question three, page 16:</p> <ul style="list-style-type: none"> • HSG 21 Broomhills was consulted on as a reasonable alternative; • HSG 22 Burdiehouse was presented as one of the preferred options. <p>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</p>		

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 54 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)**
- Objects to proposal HSG 21 Broomhills, however if it remains access should be provided from Lasswade Road. Proposal includes incorrect street naming. **(0741 Norma Austin Hart)**
- 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**

(0358 Gilmerton Inch Community Council; 2660 Kezia Dugdale MSP; 2662 Ian Murray MP and 37 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 access should be provided from Lasswade Road. Proposal includes incorrect street naming. **(0741 Norma Austin Hart)**
- 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)**
- 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 54 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 21 Broomhills 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 37 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.] **(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)**
- 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.

Representations seeking removal of HSG 21 Broomhills

- **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 54 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)**

Representations seeking removal of HSG 22 Burdiehouse

- **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.

(0358 Gilmerton Inch Community Council; 2660 Kezia Dugdale MSP; 2662 Ian Murray MP; and 37 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; 2639 David Morgan)**
- 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:

Reporter’s recommendations:

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:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>15 individuals seeking removal of HSG 23 Gilmerton Dykes Road (see Issue 9 Appendix A)</p> <p>57 individuals seeking removal of HSG 24 Gilmerton Station Road (see Issue 9 Appendix B)</p> <p>24 individuals seeking removal of HSG 25 The Drum (see Issue 9 Appendix C)</p>	<p>Organisations, elected representatives and individuals other than those in Issue 10 Appendices A, B & C:</p> <p>0004 Ann Nicoll 0118 Tracy Laidlaw 0244 Tony Gray 0247 Nicholas Trollope 0358 Gilmerton Inch Community Council 0492 Candlemaker’s Residents Association 0729 Anthony Randell 0741 Councillor Norma Austin Hart 1202 Land Options East 2035 Janet McNab 2088 Scottish Government 2126 Cockburn Association 2217 William Scott 2660 Kezia Dugdale MSP 2662 Ian Murray MP</p>	
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):		
<p>CONTEXT</p> <p>The Main Issues Report consulted on the housing site options in South East Edinburgh, see question three, page 16:</p> <ul style="list-style-type: none"> • 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. <p>The sites were included in the First Proposed Plan and received representations both objecting to their inclusion and supporting their inclusion as housing</p>		

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)**

Representations seeking removal of HSG 25 The Drum

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.

Representations seeking removal of HSG 23 Gilmerton Dykes Road

- **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:

Reporter's recommendations:

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:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>412 individuals seeking removal of HSG 29 Brunstane (see Issue 10 Appendix A)</p> <p>Organisations, elected representatives and individuals other than those in Issue 10 Appendix A:</p> <p>0223 Dalrymple Trust 0322 Adrian & Roxane Laird Craig 0378 Barry Turner 0711 Brunstane Group 0828 Network Rail 0949 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)</p>	<p>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 2315 Joyce Smith 2353 Garden History Society in Scotland 2406 David Walker 2414 Newcraighall & Brunstane Planning Group 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</p>	
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):		
<p>CONTEXT</p> <p>The Main Issues Report consulted on the housing site options in South East</p>		

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 biodiversity and natural habitat. **(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)**
- Cannot see a case for objection to development on this site and believes footpath will create a new and defensible greenbelt boundary. **(0378 Barry Turner)**

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; 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; 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; 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

- 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)**

Representations opposed to SCH 9 Brunstane in current form and seeking its removal and/or change

- 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:

Representations opposed to HSG 26 Newcraighall North in current form and seeking its removal and/or change

- 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; 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; 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; 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)**

Representations opposed to SCH 9 Brunstane in current form and seeking its removal and/or change

- 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:

Site selection - HSG 26 Newcraighall North, HSG 27 Newcraighall East & HSG 29 Brunstane

- 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.

Representations opposed to HSG 26 Newcraighall North in current form and seeking its removal and/or change

- 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)**

Representations seeking removal of HSG 27 Newcraighall East

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; 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 Newhailes House, 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 draft 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 Lauderdale'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 Gilbertstoun 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 in accordance with Policy Des 3, but if considered necessary, seeks merit in such a requirement being 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 Environmental 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; 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; 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

- 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)**

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:

Reporter’s recommendations:

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:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>48 individuals seeking removal of HSG 32 Builyeon Road (see Issue 11 Appendix A)</p> <p>54 individuals seeking removal of HSG 33 South Scotstoun (see Issue 11 Appendix B)</p> <p>27 individuals seeking removal of HSG 34 Dalmeny (see Issue 11 Appendix C)</p> <p>21 individuals seeking removal of HSG 32 & 33 (see Issue 11 Appendix D)</p> <p>39 individuals seeking removal of HSG 32, 33 & 34 (see Issue 11 Appendix E)</p> <p>Organisations, elected representatives and individuals other than those in Appendices A – E</p> <p>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 Mclvor 1033 Robert Robertson 1020 Varney Residents Association</p>	<p>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</p>	

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):	
<p>CONTEXT</p> <p>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;</p> <ul style="list-style-type: none"> • HSG 32 Builyeon Road, Queensferry • HSG 33 South Scotstoun, Queensferry • HSG 34 Dalmeny <p><u>Representations seeking removal of HSG 32 Builyeon Road</u></p> <p>Seek removal of HSG 32 on the grounds of one or more of the reasons listed below:</p> <ul style="list-style-type: none"> • 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 assess 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 48 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 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 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 assess 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 54 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 assess 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)

Supports allocation of HSG 34

- Supports allocation of HSG 34 Dalmeny. **(2480 Rosebery Estates Partnership)**

Representations opposed to HSG 34 Dalmeny in current form and seeking its removal and/or change

- 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 Dalmeny Station and Bankhead Road. **(0271 Merrill 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)**

Representations seeking removal of HSG 32 Builyeon Road & HSG 33 South Scotstoun

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 to 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 assess 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)

Supports allocation of HSG 32, 33 & 34

- 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 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

- 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 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)**

Representations seeking removal of HSG 33 South Scotstoun

- Remove proposal from the Plan. **(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

- 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 to 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 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)**

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 Builyleon 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)**

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)

Supports allocation of HSG 34 Dalmeny

- **2480 Roseberry Estates Partnership**

Representations opposed to HSG 34 Dalmeny in current form and seeking its removal and/or change

- 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 Mclvor)**
- 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 William Tunnell)**

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 and 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:

Reporter's recommendations:

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:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>147 individuals seeking removal of HSG 35 Riccarton Mains Road (see Issue 12 Appendix A)</p> <p>158 individuals seeking removal of HSG 36 Curriehill Road (see Issue 12 Appendix B)</p> <p>193 individuals seeking removal of HSG 37 Curriehill Road (see Issue 12 Appendix C)</p> <p>47 individuals seeking removal of HSG 35, 36 & 37 Newmills Road (see Issue 12 Appendix D)</p>	<p>Organisations, elected representatives and individuals other than those in Issue 12 Appendix A, B, C & D:</p> <p>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</p>	
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):		
<p>CONTEXT</p> <p>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.</p> <p>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</p>		

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.
- **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; 0480 Currie East Neighbourhood Watch; 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. 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.

Representations seeking removal of HSG 35 Riccarton Mains Road

- **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.

(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

- 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. **(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.

(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

- 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. **(0305 Colinton Amenity Association; 0480 Currie East Neighbourhood Watch; 1342 Iain Proudfoot)**

Reporter's conclusions:**Reporter's recommendations:**

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:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>31 individuals seeking removal of HSG 28 Ellen's Glen Road (see Issue 13 Appendix A)</p> <p>109 individuals seeking removal of HSG 30 Moredunvale (see Issue 13 Appendix B)</p> <p>719 individuals seeking removal of HSG 31 Curriemuirend (see Issue 13 Appendix C)</p> <p>58 individuals seeking removal of HSG 31 and GS10 (see Issue 13 Appendix D)</p> <p>Organisations, elected representatives and individuals other than those in Appendices A, B and C</p> <p>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</p>	<p>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</p>	

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 Curriemuirend Park) and greenspace proposal GS10 Curriemuirend.
Planning authority's summary of the representation(s):	
<p>CONTEXT</p> <p>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.</p> <p>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.</p> <p><u>Representations seeking removal of HSG 28 Ellens Glen Road</u></p> <p>Seek removal of HSG 28 on the grounds of one or more of the reasons listed below:</p> <ul style="list-style-type: none"> • 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. Object to the proposed new cycle path because of anti-social behaviour. • 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. • 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. <p>(1064 Malbet and Yewlands Residents Association; 2006 Liberton & District Community Council; 2126 Cockburn Association; 2662 Ian Murray MP; and individuals listed in Appendix A)</p>	

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 grounds 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; 1213 Friends of Curriemuirend 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

- 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, including HSG31 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 Curriemuirend 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 Curriemuirend Park and GS10 Curriemuirend

Seek removal of HSG 31 and GS 10 on the grounds of one or more of the reasons listed below:

- **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 HSG30 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 HSG30 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 HSG31 Curriemuirend

- Remove proposal from the Plan.

(170 Balerno Community Council; 184 Curriemuirend Park Allotment Association; 305 Colinton Amenity Association; 321 Ratho & District Community Council; 1150 Bill Henderson; 1213 Friends of Currimuirend Park; 1554 Wester Hailes Community Council; 1638 Juniper Green/Baberton Mains Community Council; 2706 Juniper Green Community Council and individuals in Appendix C)

Representations opposed to HSG31 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 should 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 Curriemuirend Park)**
- Remove proposal from plan, the site 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. Suggest 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 Beavers; 2237 Cliff Beavers)

Representations seeking removal of Hsg 31 and GS 10 Curriemuirend

- Remove proposal from the Plan.

(1638 Juniper Green/Baberton Mains 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.

- **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

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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)

Representations opposed to HSG28 Ellen's Glen Road in current form and seeking its removal and/or change

- 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 2. Sewage, subsidence and other environmental issues including the impact on residential amenity is addressed through Policy Env22. 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.

No modification proposed.

(1221 Moredun 4 Multis Residents Association; 1226 Goodtrees Neighbourhood Centre; 2126 Cockburn Association and individuals in Appendix B)

Representations opposed to HSG30 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 - HSG31 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 reduction 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's Quality Assessment. 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.

(170 Balerno Community Council; 184 Curriemuirend Park Allotment Association; 305 Colinton Amenity Association; 321 Ratho & District Community Council; 1150 Bill Henderson; 1213 Friends of Currimuirend Park; 1554 Wester Hailes Community Council; 1638 Juniper Green/Baberton Mains Community Council; 2706 Juniper Green Community Council and individuals in Appendix C)

Representations opposed to HSG31 Curriemuirend in current form and seeking its removal and/or change

- 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 Curriemuirend 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's Quality Assessment. 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 and transport infrastructure is set out for each site individually above.

No modification proposed. (1638 Juniper Green/Baberton Mains Community Council and Individuals in Appendix D)
Reporter's conclusions:
Reporter's recommendations:

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:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>0131 Iain & Alison Macleod 0225 Cramond & Barnton Community Council 0244 Tony Gray 0278 Richard Owen 0324 Ross Lennen 0326 Loiusa Lennen 0328 Ian Lennen 0330 Jeff Deherdt 0331 Lynne Deherdt 0517 W & R Stewart 0651 M Allen & P Scott 0755 BDW Trading Ltd 1202 Land Options East 1921 Derek Cran 1998 Bruce Finday Mair 2006 Liberton and District Community Council</p>	<p>2088 Scottish Government 2168 Yvonne Tuffy 2246 Mactaggart & Mickel Homes 2265 Springfield Properties 2275 Murray Estates 2279 Hallam Land Management Ltd 2281 Wallace Land Investment and Management 2291 Defense Infrastructure Organisation 2334 Paul and Sally Rutkowski 2408 HolderPlanning 2421 SEEDco 2480 Rosebery Estates Partnership 2584 Sally Mair 2649 Carina Dahlstrom 2717 Ruth Davies</p>	
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):		
<p>CONTEXT</p> <p>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).</p> <p>WEST EDINBURGH</p> <p><u>Edinburgh Garden District - East of Millburn Tower</u></p> <ul style="list-style-type: none"> • Suggests the allocation of Edinburgh Garden District for housing. 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. 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; 0517 W & R Stewart; 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)**
- Suggest that the Plan should clarify if the land at East of Milburn Tower is part of the Plan or not. **(0278 Richard Owen)**
- 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 safeguarded 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. States that these additional housing sites 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 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)**

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 opportunities and removed from the green belt. The representation restates the position that the sites can be developed sensitively. **(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; 1998 Bruce Finday Mair; 2584 Sally Mair; 0131 Iain & Alison Macleod; 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. Burdiehouse 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 accommodate at least 600-650 residential 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. 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 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. 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)**

South East Wedge (South)

- Suggested that the South East Wedge 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 stabilising 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; 0278 Richard Owen; 0324 Ross Lennen; 0326 Louisa Lennen; 0328 Ian Lennen; 0330 Jeff Deherdt; 0331 Lynne Deherdt; 0517 W & R Stewart; 0651 M Allen & P Scott; 2168 Yvonne Tuffy; 02717 R Davies)**
- Requires clarity over whether the Plan includes land East of Milburn Tower or not. **(0278 Richard Owen)**

East of Ratho Station

- Suggests the allocation of land at East of Ratho Station 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. **(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. **(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 as residential development opportunities 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 for 220 houses. **(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. **(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. 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)**

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 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.

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. **(2275 Murray Estates; 0225 Cramond & Barnton Community Council; 0244 Tony Gray; 0278 Richard Owen; 0324 Ross Lennen; 0326 Louisa Lennen; 0328 Ian Lennen; 0330 Jeff Deherdt; 0331 Lynne Deherdt; 0517 W & R Stewart; 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

South of Frogston Road East

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 Alnwickhill 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 detrimental.

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 considered the Candidate Strategic Housing Site – Burdiehouse. The reporter recommended that an 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.

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 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 part of Green Space Proposal GS4.

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 through 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 compatible 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. **(2408 HolderPlanning)**

Reporter's conclusions:

Reporter's recommendations:

Issue 15	Suggested Housing Sites Outwith the Urban Area – North West	
Development plan reference:	Table 4 pages 25 – 27 Proposals Map	Reporter:
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):		
<p>CONTEXT</p> <p>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).</p> <p><u>Kirkliston East</u></p> <ul style="list-style-type: none"> 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. <p>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)</p> <p><u>'Factory Field', Kirkliston</u></p>		

- 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.

Kirkliston East

- The land was assessed under 'Kirkliston East' in the Environmental Report - Second Revision, Volume 2, June 2014 pages 144-146 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 pages 147-149 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:**Reporter's recommendations:**

Suggested Housing Sites Outwith the Urban Area – South West		
Development plan reference:	Table 4 pages 25 – 27 Proposals Map	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
0204 Gordon Laing 0685 Cala Management Ltd 0698 David Wilson Homes and J & J Muir 1252 Michael Crowe 2085 A & D Brewster 2131 Lafarge Tarmac 2251 Taylor Wimpey	2272 Lord Dalmeny 2275 Murray Estates 2276 Gladman Developments Ltd 2278 Stewart Milne Homes 2280 Mr and Mrs Philip and Barratt David Wilson Homes 2281 Wallace Land Investment and Management 2333 Goldsmith Brothers Ltd 2583 Colin Paton	
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):		
<p>CONTEXT</p> <p>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.</p> <p>RATHO</p> <p><u>South of Freeland Road</u></p> <ul style="list-style-type: none"> • 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, 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) <p><u>East of Ratho (land at Ashley House)</u></p>		

- 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)**

Currivale

- 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 DISTRICTEdinburgh 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

South of Freelands Road

- 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)**

South of Ratho Park Road

- 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 (Riccarton 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 be 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 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:

Issue 17	Suggested sites outwith the Urban Area - Elsewhere	
Development plan reference:	Table 4 pages 25-27 Proposals Map	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>85 individuals submitted in support of Midmar Paddock (See Issue 17 Appendix A)</p> <p>53 individuals submitted in support of Winton Gardens (See Issue 17 Appendix B)</p> <p>Organisations, elected representatives and individuals other than those in Issue 17 Appendix A & B:</p> <p>0136 Richard Gillanders 0252 Aithrie Estates 0364 Craigeith / 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</p>	<p>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 2246 Mactaggart & Mickel Homes 2266 Susan MacFarlane 2297 Friends of Craighouse 2416 Miller Homes Ltd 2425 Jo Ellis 2482 Simon Wilson 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 Iain Michie 2703 Ogilvie Homes</p>	
Provision of the development plan to which the issue relates:	<p>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.</p> <p>Sites not allocated for commercial and business use outwith the Urban Area, which are being promoted by developers and landowners in their representations.</p>	
Planning authority's summary of the representation(s):		
<p>CONTEXT</p> <p>Most of these proposed housing sites were the subject of representations to the first Proposed Plan.</p> <p><u>Midmar Paddock</u></p>		

- 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. Support non-designation of site for housing in the Plan. **(0511 Friends of the Hermitage of Braid; 0579 Esk Valley Trust; 0672 Scottish Rights of Way & Access Society; 1973 Morningside Community Council; 1976 Midmar Allotments Association; 2297 Friends of Craighouse; 2662 Ian Murray MP; 85 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 and not undermining green belt objectives. 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. 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; 2246 Mactaggart & Mickel Homes)**
- 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; 01149 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)**
- 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 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 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. **(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. **(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; 0672 Scottish Rights of Way & Access Society; 1973 Morningside Community Council; 1976 Midmar Allotments Association; 2297 Friends of Craighouse; 2662 Ian Murray MP; 85 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 and removing the site from the green belt, Special Landscape Area, Local Nature Conservation Site, and open space designation. **(1154 CALA Management Ltd; 2246 Mactaggart & Mickel Homes)**
- 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 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. **(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 Iain Michie)**

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; 2246 Mactaggart & Mickel Homes)**

Other proposed housing outwith the Urban Area

- 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, Special 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 p61 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 Iain Michie)**

Reporter's conclusions:

Reporter's recommendations:



Issue 18	Suggested Housing Sites in Urban Area	
Development plan reference:	Part 1 Section 3 Table 4 pages 25 – 27	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>96 individuals submitted in support of East Suffolk Road (See Issue 18 Appendix A)</p> <p>Organisations, elected representatives and individuals other than those in Issue 18 Appendix A:</p> <p>0153 Craigmillar Park Association 0246 Hopetoun Estate Trust/Aithrie Estates 0552 Tony Jones 0553 Pat Jones 0744 G Dunbar and Sons Builders Ltd</p>	<p>1915 Philip Hepburn 2126 Cockburn Association 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</p>	
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):		
<p>CONTEXT</p> <p>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.</p> <p><u>East Suffolk Road</u></p> <ul style="list-style-type: none"> • 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. (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)**

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. **(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)**
- No modification sought. 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

- 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)**

Brownfield sites

- Suggests that the brownfield site located at 371 Lanark Road West be allocated for housing within 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)**

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:

Reporter's recommendations:

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:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>0225 Cramond & Barnton Community Council</p> <p>0243 Friends of the River Almond Walkway</p> <p>0245 West Lothian Council</p> <p>0256 Hopetoun Estate Trust/Aithrie Estates/Hopetoun House Preservation Trust</p> <p>0360 Grahame Whitehead</p> <p>0432 Greener Leith</p> <p>0510 Morningside Community Council</p> <p>0641 Cammo Residents Association</p> <p>0651 M Allen</p> <p>0672 Scottish Rights of Way & Access Society</p> <p>0743 Mark Sydenham</p> <p>0749 Cramond and Harthill Estate</p> <p>0755 BDW Trading Ltd</p> <p>0828 Network Rail</p> <p>1015 John Watson</p> <p>1159 New Ingliston Limited</p> <p>1170 A.J.C. Clark</p> <p>1660 Adrian Graham</p> <p>1726 Marchmont & Sciennes Community Council</p> <p>1739 South East Scotland Transport Partnership</p>	<p>1789 Corstorphine Old Parish Church</p> <p>1955 Royal High School Parent Council</p> <p>1964 Grange Association</p> <p>1986 East Craigs Wider Action Group</p> <p>2013 Transport for Edinburgh Ltd</p> <p>2088 Scottish Government</p> <p>2093 Aldi Stores Ltd</p> <p>2116 Blacket Association</p> <p>2126 Cockburn Association</p> <p>2146 Transform Scotland</p> <p>2173 K J Wilson</p> <p>2354 Grange/Prestonfield Community Council</p> <p>2480 Rosebery Estates Partnership</p> <p>2517 Britannia Quay Proprietors Association</p> <p>2687 Leith Central Community Council</p> <p>2690 West End Community Council</p> <p>2697 Scottish Natural Heritage</p> <p>2700 Midlothian Council</p> <p>2706 Juniper Green Community Council</p>	
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 SAFEGUARDSGeneral

- 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)**

Other Transport Proposals and Safeguards - Cycle and Pedestrian Routes

- 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)**

Other Transport Proposals and Safeguards - Cycle and Pedestrian Routes

- 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 Blasket 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 TransportRoad

- 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 Proposal T12) 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 these transport actions 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)**

Other Transport Proposals and Safeguards - Cycle and Pedestrian Routes

- 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 certain distance of cycle routes is a matter for the Council's Active Travel Action Plan. 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. In addition, the provisions of the Disability Discrimination Act will apply 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.

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:

Reporter’s recommendations:

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:
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) 2493 IBG Stakeholders 2313 Jeremy Darot 2341 New Town & Broughton Community Council 2402 West Craigs Ltd 2460 Scottish Power 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	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	

relates:	not covered in other issues.
Planning authority's summary of the representation(s):	
<p>CONTEXT</p> <p>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.</p> <p>The first Proposed Plan set out provisions for these areas which are largely unchanged in the Second Proposed Plan.</p> <p>CITY CENTRE</p> <p><u>Proposal CC 1 – St James</u></p> <ul style="list-style-type: none"> • 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) <p><u>Proposal CC 2 – New Street</u></p> <ul style="list-style-type: none"> • 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) <p><u>Proposal CC 3 – Fountainbridge</u></p> <ul style="list-style-type: none"> • 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)**

Leith Waterfront – EW 1b Central Leith Waterfront

- 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 approved 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))**

Granton Waterfront – EW 2c Granton Harbour

- 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)**

Policy Del 4 – Edinburgh Waterfront

- 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)**
- A separate representation dealt with under Issue 2 seeks the removal of the land covered by the safeguard for relocation of the Royal Highland Centre from the green belt, made by **2559 Norton Farm Consortium**.

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 ever 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)**

Edinburgh Park / South Gyle

- 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 than 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)**

RBS Gogarburn and related matters

- 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; 133 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 EDINBURGHGeneral

- 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)**

International Business Gateway

- 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 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) 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 T16) 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 new road form the 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)**

Leith Waterfront – EW 1b Central Leith Waterfront

- 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)).**

Leith Waterfront – EW 1c Salamander Place

- 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. **(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:

Reporter's recommendations:

Issue 21	Developer Contributions Policies	
Development plan reference:	Part 2 Section 1 pages 76-78	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
0245 West Lothian Council 0698 David Wilson Homes and J&J Muir 0749 Cramond and Harthill Estate 0799 NHS Lothian Public Health & Health Policy 0828 Network Rail 1159 New Ingliston Limited 1202 Land Options East 2088 Scottish Government 2126 Cockburn Association 2192 Edinburgh Bioquarter Partners 2276 Gladman Developments Ltd	2279 Hallam Land Management Ltd 2290 Edinburgh Developers' Group (Edinburgh Chamber of Commerce) 2402 West Craigs Ltd 2505 Scottish Wildlife Trust 2683 Scottish Enterprise 2684 Homes for Scotland 2703 Ogilvie Homes 2708 Royal Highland & Agricultural Society of Scotland (RHASS) 2709 Scottish Property Federation	
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):		
<p>CONTEXT</p> <p>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.</p> <p><u>Policy Del 1 – Developer Contributions</u></p> <ul style="list-style-type: none"> • 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 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 applies 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 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. 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:**Reporter's recommendations:**

Issue 22	Design and Environment Policies	
Development plan reference:	Part 2 Section 2 pages 80 – 85 Part 2 Section 3 pages 86 – 93	Reporter:
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):		
<p>CONTEXT</p> <p>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.</p> <p>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.</p>		

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 POLICIESGeneral

- 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)**

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)**

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)**

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 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)**.

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 is 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)**.

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)**.

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 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 modifications 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. **(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)**

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)**

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)**

Reporter's conclusions:**Reporter's recommendations:**

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:
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 Gilmour 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 Craigmillar 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

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 Gilmour 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 Craigeith/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 POLICIESGeneral

- 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 Gilmour 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 Gilmour 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 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. **(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 Gilmour 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 Gilmour 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 is 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. 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 and action plans. 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 than 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:**Reporter's recommendations:**

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:
Body or person(s) submitting a representation raising the issue (including reference number):		
0124 sportscotland 0432 Greener Leith 1023 Edinburgh Airport 1345 Brock Lueck 1485 Brenda Molony 1487 Derek O'Carroll 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 22 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):		
<p>CONTEXT</p> <p>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.</p> <p>TRANSPORT POLICIES</p>		

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 SERVICESPolicy 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)**

Policy RS 3 – Waste Management Facilities

- 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; 22 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)

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)**

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 (National Energy Action Plan) 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)**

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:

Reporter's recommendations:

Issue 3 Appendix A – Seven Hills

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

Issue 3 Appendix B - Craighouse

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

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: Buileyon 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							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	
Developer	Representation Code	Site Location	Site Size (ha)	Site Capacity (Units)	Delivery Timescale	Associated Documents																				
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	Craigiehall	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 Freeland Road	50	180	Year 2017/2018- 35 units, 2018/2019- 35 units 2019/2020- 25 units, 2020/2021- 35 units, 2021/2022- 40 units	David Wilson Homes and J & J Muir, Land East of Ratho				35	35	35	35	40												
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	150	50					
CALA/Miller	00685	Currievale	30	420	Start Construction April 2017: April 2018- 25th completion, April 2019- 85th 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 achievable 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				35																	
Boland Properties (Colliers)	01463	Ravelston Quarry	2	4	Within 5 years				4																	
Blackford Hill Ltd.	02244	Midmar Paddock	4.1	10	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				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				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				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	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				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	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	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,...
	2000 units +	3 developers, programme as 50,50,100,100,150,150,150,200,200,...

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	1191	Eric Liu
0008	Scott D MacMillan	1192	Gordon Cheung
0024	Brian Minshull	1194	Douglas Anderson
0065	Linda Fullerton	1196	Sandra Cheung
0066	Moira Willis	1198	Kelly Liu
0080	Aleksander Wito	1201	E Symons
0082	Beryl Sutherland	1204	Hilda Symons
0123	James Sutherland	1207	A Krwawcz
0129	Mark Beautyman	1340	Robert Glen
0182	Alistair Hutcheon	1349	Evelyn Buchanan
0183	Grant McCulloch	1352	Martyn Strachan
0230	Graham Holden	1658	Jillian Glen
0231	Alastair Thomson	1662	John Simpson
0236	Kathy Thomson	1681	Carol Abbey
0265	Mr & Mrs Ewing	1732	Ruth Gladwell
0267	Allan Macleod	1745	Alasdair MacIntyre
0270	Ray Heyworth	1777	Cara McCulloch
0277	Ian Massie	1908	Jacquie Simpson
0281	Neil Petrie	1956	Peter Malone
0287	J Davidson	1960	S Watson
0288	Alan Campbell	1971	Scott McCulloch
0323	Bruce Patullo	1975	Ailsa Davidson
0324	Ross Lennen	1992	Keith Doig
0326	Loiusa Lennen	2004	Armando DiTano
0328	Ian Lennen	2014	Fiona Crutchfield
0330	Jeff Deherdt	2022	John Allan
0331	Lynne Deherdt	2028	Lorraine Fraser
0334	Helen Robb	2029	Frederick Neil Todd
0373	Louise Taylor	2043	Brooke Petterson
0380	Jean Morley	2044	Esther Petterson
0382	Malcolm Wright	2057	Morris Lorimer
0384	Alan Pithie	2058	John Lumsden
0385	Alisdair Pithie	2068	Fiona Lumsden
0386	Maggie Pithie	2083	Carol Mackay
0396	U Robertson	2094	Beatrice Buchanan
0404	Anne Benge	2114	Simon Jackson
0427	Cynthia Jamieson	2127	Claire Mellor-Clarke
0437	M Gilmour	2136	Sally Chalmers
0443	Lesley Hoyle	2112	Lynne Young
0468	Steven Livingstone	2140	Angus Chalmers
0485	George Braithwaite	2141	Rosina F Liston
0487	Lindsay McEwan	2155	Jamie A Mackay
0490	Michael Barrow	2157	Jet Cameron
0501	Kenneth D Pye	2165	Alan Joyce
0522	KJ Tait	2180	Christopher Peace
0528	P & L Palumbo	2186	Christine Shaw
0548	Alan Harrison	2198	Hugh Davidson
0549	Margaret Harrison	2207	Jim Baird

0561	Alex Maltman	2216	Dr Anita Morrison
0567	James Helliwell	2282	Leigh Hughes
0570	Mairi Blackie	2300	Helen Macleod
0571	Lesley Bennie	2305	Emily Liu
0597	Niketa Platt	2309	Ewan Posey
0598	David Platt	2310	Suzanne Posely
0645	Anne Gumley	2311	James Posely
0658	G R Barrow	2312	Leah Posely
0673	George Dennis Holmes	2330	Peter Widdowson
0700	William Eckford	2343	Marcel Guibout
0705	Charlotte Macbeath	2339	Anne Oliver
0707	Lawrence Elliot	2347	Julie Kirby
0714	Gordon Clarke	2357	Claire Lumsden
0819	Hamish Duguid	2362	Madeline Johnston
0847	David Scott	2365	Owen Oliver
0848	Sarah Scott	2366	Adam Oliver
0928	W.B Campbell	2371	Derren Oliver
0973	S Mackie	2372	Andrew Lumsden
0975	Marilyn Barrett	2404	Colin Mackay
1009	Pamela Mackay	2415	Claire McDowell
1014	Carol Ann Smith	2424	June Briglmen
1026	Neil Bird	2427	Byran Little
1040	Stephen Warwick	2430	Felix Reid
1050	Diamian Singh	2437	F Breckenridge
1163	Lindsay David	2470	Charlie Youngs
1164	James McKean	2471	Evie Youngs
1165	Catherine Wilson	2472	Isla Youngs
1166	Linda Clarke	2473	Katy Youngs
1167	Maria Wharton	2474	Anna Youngs
1168	Winifred Joan Whyte	2508	Marion Finc
1171	George Whyte	2541	J Breckenridge
1172	Lewis Thomson	2546	James MacPherson
1174	Dylan Egelstaff	2555	Iain Moffatt
1176	Fiona Cameron	2558	Juliet Wilson
1180	Fiona Kennedy	2598	Lisa Egan
1184	Ronald Wharton	2606	Angus Egan
1186	Sue Warwick	2620	Phoebe Egan
1187	James Hardie	2605	Naomi Egan
1188	George Preston	2627	WR Armstrong
1190	Andrea Liu	2642	Liam Liu
		2644	John Lumsden
		2671	Ian Morrison
		2720	James Tait

Issue 7 Appendix C - HSG 19 and HSG 20

0006	Gary Mill	0692	David Kidd
0023	Warren Hope	0701	Kirsty Eckford
0052	Peter Stamper	0963	Robert Thomson
0067	Iain Cameron	0992	Rosemary Steers
0099	Esther Davidson	1029	Phyllis Melvin
0111	Robert Hope	1036	Vinod Vohra
0142	R Brown	1118	Mary Kidd
0192	Richard Adlington	1120	Katherine Ross
0232	Fiona Constable	1655	Fraser Smith
0253	Alan Horne	1731	Bill Smith
0266	Rhoda Macneil	1957	Alan Shanks
0280	Pauline Hetherington	1958	Louise Eckford
0297	Gadsbey	2036	Kim McCabe
0315	Robin McLeish	2163	Jane Gould
0354	Charles Fraser	2197	Sandra Fountain
0464	E Young	2198	Hugh Davidson
0593	P Donnelly	2242	K Duckett
0625	David Ewing	2260	Séamus McCabe
0659	David L Martindale	2292	Moirá Kinnear
0691	Jayne Thorpe	2450	Helen Kennedy
		2464	Nick Gould

Issue 8 Appendix A – HSG 21 Broomhills

0244	Tony Gray	1266	Linda Lothian
0234	Charles Cornelius	1267	Alex Jackson
0421	Finlay Valentine	1268	Iain Stavert
0491	Fiona Gomes	1269	Steffi Ludwig
0555	J James	1270	Lilian Fotheringham
0507	Evelyn Faulkner	1271	Michael Hughes
0586	Jane McCann	1273	L.V.H. Martin
0587	Albert Bennett	1274	Ian Bernard
0697	Linda Wylie	1275	Susan Hampson
0912	John Matear	1276	Veronica Wright
0932	L Matheson	1277	Priscilla Ball
0983	Kay Dickson	1738	Joyce Haldane
1010	Elaine Dobbie	2031	John Stewart
1011	Eric Dobbie	2080	Susan Gill
1035	Alex Thomson	2154	Keith Gill
1140	Diana Cairns	2230	Kevin Gallagher
1151	George Baxter	2319	Pamela Gallagher
1248	Robert Fitzpatrick	2322	James Anderson
1256	Joan Bernard	2337	James Martin
1258	Peter Connolly	2323	Claire Anderson
1259	Tom Jamieson	2581	Stephen Hawkins
1260	Marjorie A White	2639	David Morgan
1261	Robert Brydon	2323	Clare Anderson
1264	Keith Salton	2337	James Martin
1265	Karen Mackenzie	2435	Karen Grieve
2635	Marion Stevenson	2495	Yvonne Webster
2639	David Morgan	2568	Stephen Hawkins

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		

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	1175	Annie Watson
0240	William Hunter	1222	Melody Jo Robertson
0413	Susan Macdonald	1223	Lorraine C Fagan
0433	Brian Chrystal	1290	R G Charles
0463	Ana Duarte	1306	Gwen Tarbet
0508	Morag Fowlie	1444	Jill Raby
0543	Robert Taylor	1445	E J Hannay
0554	Eddie Philp	1446	David Rafferty
0556	Suzanne Lowe	1453	Michael Baillie
0573	Hilary Stokes	2031	John Stewart
0576	Eric Sykes	2035	Janet McNab
0577	D Leitch	2052	Margaret S Gibson
0609	Ross Birnie	2053	James Gibson
0640	Duncan Crookston	2054	John J Gibson-Eaglesham
0642	Christine Crookston	2055	Lesley J Gibson-Eaglesham
0686	George Kenny	2056	David Eaglesham
0687	Sheila Kenny	2080	Susan Gill
0690	Joao Lima	2154	Keith Gill
0715	Patricia Meaney	2236	David Pratt
0729	Anthony Randell	2303	Stefan Kruk
0737	Young Graham	2304	Gabriela Kruk
0789	S Rogers	2344	Caroline Mulvenna
0936	Mr & Mrs David Young	2367	Janet Dawson Mowels
0964	L Hunter	2548	Euphemia Paxton
0994	Mary Gibson	2556	Timothy Hunter
0998	Catherine Paxton	2557	Andrew Wilkie
1004	Ruth Addinall	2568	Stephen Hawkins
1052	Laura Pennett	2721	David Young
1140	Diana Cairns		

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 Appendix A – HSG 29 Brunstane

0086	D & A Woodburn	0961	Chloe Walker
0147	Martin Stobbart	0962	Mariane Gibson Brown
0154	John O'Brien	0965	Gordon Eldrett
0171	K Beertram	0966	Betsy Thomson
0261	Janet Brown	0967	Harry Kiernan
0286	Susan Martin	0968	Irene Spanswick
0369	Anthony Kent	0969	D Bruton
0378	Barry Turner	0970	Thomas Baxter
0388	Pauline Cowan	0971	Sheila Baxter
0390	Angela Wrapson	0972	Paul Thomson-Bernard
0397	Elsbeth Fleming	0981	Mark Baillie
0406	Carol Richardson	0982	Eddington Drew
0407	Alaine Walters	0995	Peter Bell
0411	Adrian Tulloch	0999	Sandra Swinton
0412	Jane Tulloch	1000	J H Laidlaw
0414	Peter McGauchran	1001	J A Kowalski
0415	Janet Brodie	1003	R R Kowalski
0416	Fiona Henderson	1028	Douglas Latto
0423	John Crombie	1049	G Harkin
0424	Jessie Crombie	1054	John Dalgleish
0425	Mr & Mrs Vaughan	1058	Campbell Foggo
0430	Vivian Murphy	1063	Elizabeth McKinnon
0435	Neil Kynaston	1065	Lauren O' Brien
0436	Nicholas Ross	1068	Janet Young
0440	Margaret Ford	1071	Frank Young
0442	Jane Stafford	1072	T Webb
0444	Laurence Roscoe	1075	D J Young
0445	David Woodburn	1077	Niall O' Brien
0446	Alastair Hare	1078	Allan Turner
0449	Maria Gray	1079	Dorothy Anderson
0451	Pamela Mackay	1080	Nicky Turner
0452	Catherine Robertson	1081	Charles Thomson
0453	Keith Robson	1082	Duncan Foggo
0454	Marion Pauline Gray	1083	David Honeyman Brown
0455	G Boyd	1084	Greta Tiffney
0456	Krista Black	1086	Marie O' Brien
0457	Laurence Winram	1088	Alan Murphy
0458	Steven Black	1090	Connor Walker
0459	Doreen Hare	1092	Ian Leslie
0462	Joy Stockley	1093	Jamie Leslie
0472	Jessica Gioia	1095	Caroline Leslie
0473	David Bain	1096	George Leslie
0476	W Devine	1099	Steve Hay
0477	Gary Williamson	1104	Linda McKay
0479	Alastair Hamley	1106	S & A Yeaman
0483	William Mould	1108	Pamela Morrison
0484	Patricia Mould	1110	Eilish Garland
0488	Allan Cameron	1112	Sandra Wallace

0493	William Jansen	1114	Elizabeth Brown
0498	Ian Millar	1128	George Maxwell
0499	C Todd	1130	Audrey Johnstone
0500	R Todd	1131	Malcolm Morrison
5009	J Meldrum	1132	Megan McIntosh
0512	James Crombie	1134	Elaine Wilson
0513	Euan Thomson	1135	Sade Bankole
0514	Fiona Thomson	1137	Lynn Aitchison
0515	Nicola Thomson	1138	Jennifer Jones
0537	Anne Thomson	1140	Diana Cairns
0540	Frank Sibbald	1142	Alexander McKay
0541	Joyce Sibbald	1143	F N Ford
0544	Denise Marr	1147	D Creelie
0551	John Speedman	1328	Margaret Steel
0557	James Turnbull	1355	Evelyn Jamieson
0564	John Mccarron	1356	Vincent Holliean
0582	Donald Ball	1357	John Bishop
0590	Damian Rowell	1358	Bruce Murray
0591	William McKay	1359	Norman Brown
0592	S Rahimi-rizi	1360	Joyce Brennan
0596	Jennifer Whitehouse	1361	David Adam
0600	Sheena Cramb	1362	D Skirving
0602	G A M Johnstone	1363	Gwenan Sedgeworth
0603	Jacqueline Griffin	1364	Judith Smith
0604	Jamie Griffin	1365	James Brennan
0610	G A Dickerson	1366	George Maxwell
0611	Gail Simpson	1367	Catherine Jansen
0613	Pauline Hamilton	1368	Natalie Welsh
0614	B P Wilson	1369	Margaret Ramsay
0615	William Hamilton	1370	M H B Ramsay
0616	Robert Graeme Arnott	1371	Alexander Foster
0617	Julie Wilson	1372	Julie Foster
0619	Paul Arnott	1373	David Morham
0620	R G Arnott	1374	Karen Morham
0621	Janice Arnott	1375	Elizabeth Morham
0629	Gavin Fairbairn	1376	Janet Brown
0630	Helen Knox	1377	Nichola Spence Fraser
0634	Michael R Richards	1378	Brian Bradley
0635	David Gordon	1379	Mike Cheesbrough
0639	Ian Marr	1380	Janet Beveridge
0644	Donald Thomson	1381	Lindsay Sedgeworth
0647	Andrew Shiels	1382	Richard Alastair Scott
0650	M G T Falconer	1383	Sandra Craig
0656	Sandra O'Binnie	1384	Marjory Lamb
0665	Barbara McLuckie	1385	Katherine Robertson
0678	Doherty	1386	Kenneth J McKenzie
0681	Lisa McCallum	1387	N McQueen
0682	Rosalind McCallum	1388	Helen Kiernan
0683	Scott McCallum	1389	Paul McGhee
0684	S McCallum	1390	John Colledge

0702	Sammy Hyett	1391	Mary Sprott
0704	Kyle McLennan	1392	Angela Mackay
0708	Neil Cochran	1393	Neil McDonald
0709	Jennifer Cochran	1395	Ian Small
0710	Ian Caldwell	1396	Denise Colledge
0712	Yvonne Caldwell	1397	David Grant
0713	K Inness	1398	Anne Blunden
0718	Margaret Mckinley	1399	Brian Montgomery
0719	Thomas Ford	1400	J Black
0724	Grace Buckingham	1401	I F Smith
0730	Lee Dickson	1402	D Dorian-Smith
0735	Hayley Johnson	1403	Laura Nolan
0739	Ernest M. Whiteoak	1404	Kevin Nolan
0745	Celia Butterworth	1405	Shannon Nolan
0750	Paul Dunning	1406	Kathleen Nolan
0751	Laura Doyle	1408	Joseph McVey
0753	Steven Carlin	1409	Neil Martin
0754	Amanda Carlin	1410	Catherine Nolan
0756	Melanie Sangster	1411	Moira Nolan
0757	Marcus Sangster	1413	Stephen Lorimer
0758	Sheila Thomson	1416	Charles Smith
0759	Janie Buchanan	1417	Sheila C Smith
0760	Imran Akran	1419	Robert Bruce Powell
0761	Sharon Mackenzie	1420	Ronald Duncan Douglas
0762	Louise Newall	1421	Sylvia Nesbit
0763	Nigel Finlam	1422	Theresa Ogg
0765	Andrew Anderson	1423	Iain Abbot
0767	Irvine Allan	1424	Fiona Johnston
0772	Kenny McGregor	1425	Douglas Mair
0776	G Ali	1426	Ishbel Mair
0777	Allan Williams	1427	Madeleine Latto
0778	Richard Skeldon	1429	Joseph Arnott
0779	Rhiannon Naismith	1431	Susan Graham
0780	Jasmine Ghazantar	1432	Grahame Robertson
0781	Isabel Armstrong	1434	William Noble
0782	Ralph Hannay	1435	Ian Greep
0783	Elizabeth Telford	1437	Evelyn Saunders
0785	N Hannay	1480	James Thomson
0787	Charles Roper	1481	Eva Thomson
0790	Doreen Douglas	1482	Wendy Bain
0791	Yvonne Thabet	1485	Brenda Molony
0792	David Gail	1495	Sheila Bullen
0793	Mark Noble	1496	Kenneth Bullen
0796	Sahra Noble	1535	Karen Irving
0797	David McKinnon	1683	Lynsey Orbegozo
0798	Norma Fisher	1687	Patricia Anne Rodger
0800	William McGregor	1979	Sean Hignett
0801	John Nesbit	1980	Gillian Anderson
0802	William Tait	1981	Stephen Griffin
0803	Shazia Akram	1983	Caroline De Jonge

0804	Ronald McDonald	1988	Helen Lumsden
0805	Jane McDonald	1989	Peter Wraith
0806	FE McDonald	2001	Shelagh Rodger
0807	Tracey McGregor	2003	Frances Wraith
0808	Michael Wingate	2009	Ursula Wright
0809	Antonio Mozzarella	2012	Gareth Thomson
0810	Victoria Gibson	2015	Carol Mathieson
0811	Marlene Tait	2030	Richard Wright
0812	Ann Noble	2039	Elisabeth McCulloch
0813	Ross	2065	Kris Griffiths
0814	Callum Nesbit	2069	Alex Lumsden
0815	Charlie Philp	2084	Lynn Stewart
0816	Christine Philp	2125	Martijn De Jonge
0817	Alister Hadden	2159	Claire Duncanson
0825	Gordon Santana	2160	Mirelle Allan-Wheeler
0831	Stephen Quinn	2164	Chris Hewitt
0878	Helen MacNeath	2181	Raymond Faccenda
0891	June Doyle	2182	Frances Faccenda
0899	David Smith	2187	L Davies
0901	Kim Waugh	2190	Elizabeth Stuart
0904	Kevin Doyle	2205	Janette Allan
0905	April Fyfe	2209	Katie Weaver
0906	Alan Waugh	2215	Tommy Taylor
0907	Mohammed Akram	2221	John Scott
0908	Kalsoom Akram	2225	Jonathon Ash
0909	Margo Stewart	2226	Ewan Sinclair
0911	Kenneth Stewart	2234	Rachel Everitt
0913	Billy Mckinley	2247	Ben McLeish
0914	Billy Mckinley Jnr	2264	Catherine Carnegie
0915	McNab	2294	Ian Gardner
0916	Michael Taylor	2295	Elaine Dobbie
0917	L P McPhillips	2336	Michael James McGrath
0918	Alan J Yeaman	2401	Helena Forses-Scott
0920	Shiela Shillitto	2403	Victoria Allan
0921	Nicole Noble	2423	Stephen Foster
0923	Dawn Noble	2436	Linda Armstrong
0924	P Dunlop	2438	Susan Davidson
0926	Catherine Thomson	2447	David Stillie
0927	Lesley Boubert	2457	Jacqueline Ritchie
0938	Carla Bichan	2478	Patsy King
0939	Lynn Panton	2481	Fiona King
0940	Linda Dobson	2485	Hazel Hewitt
0942	Alan Henderson	2498	Alexander Gilroy
0943	Joan Henderson	2501	Mark McLean
0945	Sheila Fisher	2515	Jonathon Wraith
0946	Melvyn Lee	2521	Martin Kelly
0947	Maureen Harkness	2522	James Hurford
0948	Agnes Foster	2535	I B Hansen
0949	Yvonne Speedman	2568	Stephen Hawkins
0951	Maureen Scott	2581	Eric McCabe

0952	Frances Whiteoak	2613	Douglas Greatorex
0953	Thomas Tiffney	2646	David King
0954	Elizabeth Turner	2647	Gillian Dunn
0955	Fay Foggo	2659	Elaine Gilroy
0956	Pam Denholm	2665	Robert Tait
0957	Gail Brown	2666	Catriona Salvona
0958	Norma Brown	2701	Portobello Heritage Trust
0959	A McCauley		
0960	Gilmour Brown		

Issue 11 Appendix A - HSG 32 Builyeon Road

0045	Georgina Hay
0079	Robin Morris
0087	Peter FitzGerald
0374	Sharon Howat
0495	David Donnelly
0552	Tony Jones
0553	Pat Jones
0618	Graham Sutherland
0667	Leslie Chapman
0622	Evelyn Sutherland
0667	Leslie Chapman
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

0045	Georgina Hay	1100	Nicholas Jackson-Bass
0160	Mr & Mrs Ritchie	1200	Julie Devlin
0231	Alastair Thomson	1484	Lorna Duffin
0242	Iain Russell	1589	Edward Kelly
0300	Iain Scott	1689	Susan MacNeil
0340	Fiona Carvel	1729	Katharine Ness
0363	John Halliday	1786	Catherine Bolan
0374	Sharon Howat	1794	Christine Wood
0481	J Dodgson	2016	Samantha MacNeil
0552	Tony Jones	2087	Ivor Murray
0553	Pat Jones	2206	Claire Smith
0576	Joan Proven	2128	Diane Hogg
0584	Lisa Topping	2162	Frances Kirkwood
0618	Graham Sutherland	2208	Kenneth Morrison
0622	Evelyn Sutherland	2220	Chris Ward
0688	David Willis	2325	Donald Jackson
0693	Louise Beattie	2348	Karen Solley
0716	Denise Havard	2380	Moira Fraser
0717	Lindsay Agnew	2381	Debbie Murray
0919	Jill Woodley	2420	John Shaw
0933	Nicholas Gracie Carmichael	2434	Fiona Duncan
0991	Sandra Jackson-Bass	2477	Iain MacRobert
1006	John Boyd	2512	Linda Macleod
1045	Johan Harrower	2531	Patrice Reid
1053	Pamela Fowler	2562	Joanne Underhill
1098	Barbara Mathieson	2603	Tricia Fraser
		2614	Moira Lyne
		2618	Caroline Bell
		2674	Vicky West

Issue 11 Appendix C - HSG 34 Dalmeny

0045	Georgina Hay
0231	Alastair Thomson
0333	Andrea Robertson
0340	Fiona Carvel
0363	John Halliday
0531	Helen Kingan
1042	Fiona Christie
1053	Pamela Fowler
1594	Richard Carvel
1786	Catherine Bolan
2082	Susan Williamson
2087	Ivor Murray
2126	Frances Kirkwood
2208	Kenneth Morrison
2231	Sheila Page
2307	David Murdoch
2348	Karen Solley
2352	Collin
2358	Keith Hogg
2380	Maira 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 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 Wotherspoon
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 Appendix A – HSG 35 Riccarton Mains Road

0007	Archie Smith	0563	Kenneth Dickson
0091	Margaret Gourlay	0566	Helen Lumsden
0098	James Simpson	0572	Nicola Watson
0100	Robin Davey	0575	Robert Renton
0101	Evelyn Davey	0733	Mark Galloway
0102	D Stewart	0980	Robert Turnbull
0103	C Stewart	0985	Isabella Howes
0105	J Gatenby	1021	E.J Harkness
0106	William Burns	1024	Barbara McMaster
0137	Desmond Brady	1025	R.A Harkness
0148	Sheila Reid	1030	Ann Stephen
0166	Beryl Moncrieff	1034	Kenneth Stephen
0167	Douglas Allan	1039	James Cunningham
0169	Anne Murray	1041	B Clark
0174	Lorna Thompson	1061	George Chalmers
0178	Phillip Thompson	1062	Susan Chalmers
0198	Elaine Wilkinson	1076	George Marple
0203	Scott Watson	1085	Emma Marple
0204	Gordon Laing	1087	Carole Marple
0205	W Watson	1091	Richard Cameron
0206	Christine Laing	1094	Mette Friis
0207	Peter Mack	1101	Alison Lyon
0208	Fiona Mack	1102	George Gill
0209	A. Cameron Grant	1107	Patricia Gill
0210	Kerstin Grant	1113	George S Ballantyne
0214	Gillian Mackenzie	1116	Sandra Cunningham
0215	Stephen Mackenzie	1126	Colin Arthur
0216	Kenneth Ashurst	1150	Bill Henderson
0217	Evelyn Ashurst	1152	Lorna Henderson
0218	Colin Ashurst	1153	Janet Johnston
0219	Margaret Forsyth	1156	Alan Johnston
0220	Robert Charles Forsyth	1157	John Henderson
0221	Jill Thomson	1158	Alison Henderson
0222	Andrew Thomson	1348	Harry Simpson
0249	D.C Foggo	1492	Richard Mitchell Henderson
0250	M.A Foggo	1661	James Westwood
0255	Jennifer Mallon	1929	K Burnside
0257	Alex Mallon	2005	Keith Bain
0258	Jean Barton	2067	William Hamilton
0262	Douglas Reid	2109	Margaret Deans
0264	Eleanor Wilkinson	2129	Stewart Dredge
0279	Maurice Green	2139	Russell Salton
0282	E Manson	2183	Ewing Grainger
0289	Stewart Mackinnon	2191	George A Fraser
0296	Joyce Sneddon	2202	Alan Johnston
0307	Catherine Dowds	2219	Arlene Ward
0316	Gladys Morton	2220	Chris Ward
0320	Alexander Valentine	2224	Janet Mary Cowlishaw

0327	Douglas Marr	2240	Teresa Martin
0336	Tim Lear	2253	Michael Martin
0351	Connie Trail	2261	Peter Dawson
0352	Derek Trail	2296	Eddie Gownas
0356	Margaret Tracey-Bower	2298	Linda Gowans
0365	Angela Loftus	2374	Rosalind Salton
0370	Malcolm Stewart	2412	Peter Cowlshaw
0383	Robert Hodge	2466	Kristina Vysotskaja
0391	Holman	2469	Andrew Naylor
0392	George Taylor	2483	Douglas N Lowe
0393	Alisdair Taylor	2490	Alex Heron
0395	Sue Hamilton	2503	Beth Rankin
0399	Mary McLeod Hodge	2530	Enid L Lowe
0461	Jennie Hulse	2571	Scott Lobban
0466	James Douglas	2575	Greig Buckner
0469	Peter Wilson	2577	Nicola Boyle
0497	Douglas Hamilton	2578	Keri Lobban
0516	Jon Wilson	2579	William Lobban
0524	Kathleen Dishington	2587	Elizabeth Lobban
0527	Caroline Milne	2588	Jacqueline Lobban
0530	J Macdonald	2591	Stephanie Russell
0545	Kenneth Rankin	2601	Janet Russell
0546	Paul Hulse	2626	Jack Millar
0547	Pauline Rankin	2667	Fraser Mackay
0560	John Lumsden	2668	Louise Mackay
0562	Shauna Dickson		

Issue 12 Appendix B – HSG 36 Curriehill Road

0085	Ann Visser	0562	Shauna Dickson
0091	Margaret Gourlay	0563	Kenneth Dickson
0098	James Simpson	0566	Helen Lumsden
0100	Robin Davey	0575	Robert Renton
0101	Evelyn Davey	0733	Mark Galloway
0102	D Stewart	0764	Ian McGlade
0103	C Stewart	0937	Harry Simpson
0105	J Gatenby	0980	Robert Turnbull
0106	William Burns	0985	Isabella Howes
0107	Robert Phillips	1021	E.J Harkness
0112	Pearl Clark	1024	Barbara McMaster
0135	Andrew Clark	1025	R.A Harkness
0137	Desmond Brady	1030	Ann Stephen
0148	Sheila Reid	1034	Kenneth Stephen
0166	Beryl Moncrieff	1039	James Cunningham
0167	Douglas Allan	1041	B Clark
0169	Anne Murray	1061	George Chalmers
0174	Lorna Thompson	1062	Susan Chalmers
0178	Phillip Thompson	1076	George Marple
0180	Graham Curran	1085	Emma Marple
0198	Elaine Wilkinson	1087	Carole Marple
0203	Scott Watson	1091	Richard Cameron
0204	Gordon Laing	1094	Mette Friis
0205	W Watson	1101	Alison Lyon
0206	Christine Laing	1102	George Gill
0207	Peter Mack	1107	Patricia Gill
0208	Fiona Mack	1113	George S Ballantyne
0209	A. Cameron Grant	1116	Sandra Cunningham
0210	Kerstin Grant	1122	Christine Thompson
0214	Gillian Mackenzie	1123	Stephen J Thompson
0215	Stephen Mackenzie	1126	Colin Arthur
0216	Kenneth Ashurst	1136	Steven Aldridge
0217	Evelyn Ashurst	1150	Bill Henderson
0218	Colin Ashurst	1152	Lorna Henderson
0219	Margaret Forsyth	1153	Janet Johnston
0220	Robert Charles Forsyth	1156	Alan Johnston
0221	Jill Thomson	1157	John Henderson
0222	Andrew Thomson	1158	Alison Henderson
0249	D.C Foggo	1333	Alasdair Sligo
0250	M.A Foggo	1492	Richard Mitchell Henderson
0255	Jennifer Mallon	1661	James Westwood
0257	Alex Mallon	1929	K Burnside
0258	Jean Barton	2005	Keith Bain
0262	Douglas Reid	2067	William Hamilton
0264	Eleanor Wilkinson	2109	Margaret Deans
0279	Maurice Green	2129	Stewart Dredge
0282	E Manson	2139	Russell Salton
0289	Stewart Mackinnon	2183	Ewing Grainger

0296	Joyce Sneddon	2191	George A Fraser
0303	James Loftus	2202	Alan Johnston
0316	Gladys Morton	2219	Arlene Ward
0320	Alexander Valentine	2220	Chris Ward
0327	Douglas Marr	2224	Janet Mary Cowlshaw
0336	Tim Lear	2240	Teresa Martin
0351	Connie Trail	2253	Michael Martin
0352	Derek Trail	2261	Peter Dawson
0356	Margaret Tracey-Bower	2296	Eddie Gownas
0365	Angela Loftus	2298	Linda Gowans
0370	Malcolm Stewart	2318	Arthur Howes
0371	Douglas Kinghorn	2373	C Jones
0383	Robert Hodge	2374	Rosalind Salton
0391	Holman	2412	Peter Cowlshaw
0392	George Taylor	2466	Kristina Vysotskaja
0393	Alisdair Taylor	2469	Andrew Naylor
0395	Sue Hamilton	2483	Douglas N Lowe
0399	Mary McLeod Hodge	2530	Enid L Lowe
0431	Jeni Sligo	2571	Scott Lobban
0461	Jennie Hulse	2574	Jacqueline Lobban
0466	James Douglas	2575	Greig Buckner
0469	Peter Wilson	2577	Nicola Boyle
0497	Douglas Hamilton	2578	Keri Lobban
0516	Jon Wilson	2579	William Lobban
0518	Alan Wilkie	2587	Elizabeth Lobban
0523	William Dent	2591	Stephanie Russell
0524	Kathleen Dishington	2601	Janet Russell
0527	Caroline Milne	2626	Jack Millar
0530	J Macdonald	2667	Fraser Mackay
0532	Alan Coupe	2668	Louise Mackay
0546	Paul Hulse		
0560	John Lumsden		

Issue 12 Appendix C – HSG 37 Newmills Road

0091	Margaret Gourlay	0563	Kenneth Dickson
0098	James Simpson	0566	Helen Lumsden
0100	Robin Davey	0575	Robert Renton
0101	Evelyn Davey	0594	Heather Gordon
0102	D Stewart	0607	Hugh Parker
0103	C Stewart	0670	Carol Hughes
0106	William Burns	0674	Alexandra F Henderson
0107	Robert Phillips	0676	Leslie Hughes
0112	Pearl Clark	0679	Brian C Henderson
0122	Ian Alexander	0733	Mark Galloway
0125	David Hay	0764	Ian McGlade
0135	Andrew Clark	0774	Susan Smith
0137	Desmond Brady	0786	Pamela Thomas
0140	George McDonald	0852	David Steel
0141	Barbara McDonald	0985	Isabella Howes
0143	Peter Ewen	1021	E.J Harkness
0148	Sheila Reid	1024	Barbara McMaster
0166	Beryl Moncrieff	1025	R.A Harkness
0167	Douglas Allan	1030	Ann Stephen
0169	Anne Murray	1034	Kenneth Stephen
0178	Phillip Thompson	1039	James Cunningham
0180	Graham Curran	1041	B Clark
0196	Fiona Smith	1061	George Chalmers
0198	Elaine Wilkinson	1062	Susan Chalmers
0203	Scott Watson	1076	George Marple
0204	Gordon Laing	1085	Emma Marple
0205	W Watson	1087	Carole Marple
0206	Christine Laing	1091	Richard Cameron
0207	Peter Mack	1094	Mette Friis
0208	Fiona Mack	1101	Alison Lyon
0209	A. Cameron Grant	1102	George Gill
0210	Kerstin Grant	1107	Patricia Gill
0214	Gillian Mackenzie	1113	George S Ballantyne
0215	Stephen Mackenzie	1116	Sandra Cunningham
0216	Kenneth Ashurst	1122	Christine Thompson
0217	Evelyn Ashurst	1123	Stephen J Thompson
0218	Colin Ashurst	1126	Colin Arthur
0219	Margaret Forsyth	1136	Steven Aldridge
0220	Robert Charles Forsyth	1150	Bill Henderson
0221	Jill Thomson	1152	Lorna Henderson
0222	Andrew Thomson	1153	Janet Johnston
0229	David W Coull	1156	Alan Johnston
0249	D.C Foggo	1157	John Henderson
0250	M.A Foggo	1158	Alison Henderson
0255	Jennifer Mallon	1333	Alasdair Sligo
0257	Alex Mallon	1348	Harry Simpson
0258	Jean Barton	1492	Richard Mitchell Henderson
0262	Douglas Reid	1661	James Westwood

0263	David Wilkinson	1774	Ruth Smith
0264	Eleanor Wilkinson	1929	K Burnside
0278	Richard Owen	2066	C A Burnside
0279	Maurice Green	2067	William Hamilton
0282	E Manson	2072	Sarah Dawson
0284	Paul Begg	2109	Margaret Deans
0285	Josephine Bisacre	2120	Helen Sturrock
0289	Stewart Mackinnon	2129	Stewart Dredge
0298	Sunita Crawford	2139	Russell Salton
0303	James Loftus	2156	David McGregor
0306	David Young	2177	Pauline McKenzie
0307	Catherine Dowds	2183	Ewing Grainger
0310	Jim West	2202	Alan Johnston
0316	Gladys Morton	2219	Arlene Ward
0320	Alexander Valentine	2220	Chris Ward
0327	Douglas Marr	2224	Janet Mary Cowlshaw
0336	Tim Lear	2228	Sonya Dunbar
0343	David Kennedy	2239	Roy Sturrock
0346	Adam Fila	2240	Teresa Martin
0351	Connie Trail	2253	Michael Martin
0352	Derek Trail	2261	Peter Dawson
0356	Margaret Tracey-Bower	2293	Elaine Hutchison
0365	Angela Loftus	2296	Eddie Gownas
0370	Malcolm Stewart	2298	Linda Gowans
0376	Neal Fleming	2318	Arthur Howes
0383	Robert Hodge	2373	C Jones
0391	Holman	2374	Rosalind Salton
0392	George Taylor	2397	Genevieve Mackinlay
0393	Alisdair Taylor	2412	Peter Cowlshaw
0395	Sue Hamilton	2466	Kristina Vysotskaja
0399	Mary McLeod Hodge	2469	Andrew Naylor
0403	Rory Henderson	2483	Douglas N Lowe
0426	Graeme Davidson	2530	Enid L Lowe
0431	Jeni Sligo	2571	Scott Lobban
0460	Christopher Linn	2578	Keri Lobban
0461	Jennie Hulse	2579	William Lobban
0466	James Douglas	2587	Elizabeth Lobban
0469	Peter Wilson	2588	Jacqueline Lobban
0497	Douglas Hamilton	2589	Andrew Hamlett
0516	Jon Wilson	2591	Stephanie Russell
0518	Alan Wilkie	2599	Andrew Hoggarth
0524	Kathleen Dishington	2601	Janet Russell
0525	Gillian Coupe	2608	Joanne Hoggarth
0527	Caroline Milne	2615	Marian Burnett
0530	J Macdonald	2626	Jack Millar
0532	Alan Coupe	2630	Robert Thomson
0546	Paul Hulse	2667	Fraser Mackay
0560	John Lumsden	2668	Louise Mackay
0562	Shauna Dickson		

Issue 12 Appendix D – HSG 35, HSG 36, HSG 37

0084	Colin Morton	0728	Linda MacLeod
0110	Iain MacLeod	0989	Mairi Fenelon
0117	Hugh Ross	0993	Kevin Fenelon
0119	Anne Ross	1043	Michael Fenelon
0127	John Wilkinson	1170	A J C Clark
0130	Cara Wilkinson	1346	Iain McKay
0134	William Kelly	1350	Alan Campbell
0151	James McQue	1490	Matthew Philp
0162	Elizabeth Cull	1797	Graeme Kerr
0163	Roger Cull	1999	Linda Campbell
0164	James Brown	2025	Katharine Philp
0181	Lynda Angela Cowie	2034	Sheila Steven
0187	Julie Bianco	2142	James Montgomery
0188	Dario Bianco	2143	Lesley Montgomery
0269	Ian Macphail	2171	Laura Cargill
0312	Linda Philp	2329	Helen Ogg
0314	Peter Philp	2359	Alan Williamson
0338	Michael Caird	2360	Douglas Forsyth
0405	Joan Proudfoot	2442	P Cooper
0408	Marion Fleming	2455	W Cooper
0420	Louise Wilson	2575	Greig Buckner
0429	Margaret Fenelon	2577	Nicola Boyle
0496	Gordon Kinghorn	2643	Caroline Ritchie
0680	Brian Keyse		

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	1233	Thomas Judge
0400	Simon Burton	1234	Donnie Johnston
0450	Anna Goldie	1235	Zoe Angus
0465	Helen Metcalfe	1236	Derek Leslie
0467	Helen Malcolm	1237	Kaily Mills
0471	Jennifer Binnie	1239	Ashley Borthwick
0559	Alan Sneddon	1240	James Murray
0588	Donald Macarthur	1241	T Judge
0648	Andrew Hall	1242	Gordon Johnston
0769	Alec Kennedy	1243	Tracy Ivy Johnston
0770	Isobel Kennedy	1244	Fraser McLellan
0771	John Millar	1245	Duncan Stirling
0773	Ray Wynn	1246	Julie Dunn
0775	Susan Tully	1247	Sue Tomlinson
0766	Jennifer Crawford	1248	Robert Fitzpatrick
0768	A Mackenna	1278	Jamie Sutherland
0987	Alexander Crow	1282	Sean O' Boyle
0997	Sheila Crow	1284	Geoff Ward
1002	Emma Moncrieff	1288	Donka Karabunarlieva
1005	Joanna Crawford	1290	RG Charles
1007	Teigha Robertson & Young	1292	Desmond Fagan
1008	Chloe Bang	1296	Mr & Mrs Boynes
1046	Abbie Reid	1300	Nadine Reynolds
1056	Roy Pratt	1302	Richard Livingstone
1060	Sheila Wood	1304	James Tuff
1160	Poppy Evans	1309	Angela Booth
1169	Cath Clarkson	1310	Joe Cameron
1173	Brian Gray	1312	Thomas Meharry
1175	Annie Watson	1314	Jackie Cruikshank
1178	Robert Raiker	1315	D R Allan
1179	Debbie Haldane	1316	Gary Kerr
1182	Robert Lawson	1317	Monique Stevenson
1183	Alex Farquhar	1318	William John Tomlinson
1185	Zofia Wieczorek	1319	J McEwan
1189	Susan Quinn	1320	Derek Hamilton
1193	Miriam Whiting	1322	J Wotherspoon
1195	Mrs Craig	1323	Kinnear
1197	Stephanie Wood	1325	Angela Shearer
1199	Linda Alexander	1326	Keith McKenzie
1200	Julie Devlin	1327	Chris Bain
1202	Rachel Lambe	1330	Stephen Millar
1203	James Sutherland	1331	Alison McKendry
1205	George Thomson	1332	Alex Fey
1206	Maria Juste	1334	Donna McQueen
1208	Julie Gibson	1335	Dale Alexander
1212	Sarah Wynn	1336	Scott Watson
1223	Lorraine Fagan	1337	Joanne Finlay
1224	Leonie Fagan	1338	W Tully

1225	Todor Karabunaruev	1339	Kenny Paul M Todd
1227	Scott Robertson	1341	Jennifer Ewen
1228	RF Gorman	1343	Niel Hansen
1229	Neil Harvey	1963	Anne Mulligan
1230	Joe Richardson	2241	Stephnie Inglis
1231	Janet Scotland	2486	Eileen Crow
1232	Peter Shaw		

Issue 13 Appendix C - HSG 31 Curriemuirend

0009 Daniel Ferguson	1531 Norma Ross
0010 Grant Osinski	1533 J Dignan
0011 Fiona Osinski	1534 John Gow
0012 Amy Dixon	1536 H Shaw
0013 Peter McConnon	1537 Valerie Gow
0014 Agnes McConnon	1538 Seren Vickers
0015 Dave Gradwell	1539 Annika Nordstrom
0016 David McBain	1540 Brian Fulton
0017 Leigh Aitchison	1541 Kerstin Nordstrom
0018 Adam Dower	1542 Mairi Ovenston
0021 Ian Seath	1543 Linda Russell
0022 June Browne	1544 Anna Farley
0025 Damien Watson	1545 Michael Allan
0026 Paula Watson	1546 Pamela Coover
0027 Ruth Collins	1547 Marcus Malison
0028 Kevin Rushton	1548 Alex Robinson
0029 Hunter Fiona	1549 George Naylor
0030 Hugh Boyle	1550 Elaine Merrilees
0031 Claire Paterson	1551 Claire Monkman
0032 Pratt Sharon	1552 Micudel Gordon Connor
0033 Andrew Tasker	1553 Kevin Calder
0034 Jane Robertson	1555 Bryan Cameron
0035 Sarah Wilson	1556 Alex McFarlane
0036 Louise Bird	1557 Robert McGuilan
0037 Leigh Philip	1558 Neil Muirhead
0038 Jennifer Thomas	1559 Elaine Hill
0039 David Aitchison	1561 Arthur Hill
0040 Eric Moonery	1562 Katie Shepherd
0041 Irene Mooney	1563 Mag Carson
0042 John Charalambous	1564 Peter Carson
0043 Jo Potter	1565 Gordon Macdonald
0044 Susan Ferguson	1566 Paul Gunn
0047 Keith Rarity	1567 Patrick Brown
0048 David Andrew	1569 Gary McLeod
0049 S Smith	1570 Cath Munro
0050 Duncan Curr	1571 Morag Kerr
0051 Jeanette Campbell	1572 Tom Watt
0053 Steven Hunter	1573 Norman Cumming
0055 George Urquhart	1575 John Baird
0059 Claire Shirsinger	1576 Celia Baird
0060 Ronald Crichton	1577 Gerry Stovin
0062 Norma McGeever	1578 Patricia Muirhead
0063 Richard Heathwood	1579 Corina Stovin
0064 Lilian Wilson	1580 Tabitha Stovin
0068 Fiona Thorburn	1581 John Munis
0069 Helena Mackay	1582 Lynsey Inglis
0070 George MacKay	1583 Leigh Dingsdale
0071 June Browne	1584 Ewan Drysdale

0072 Charlene Taylor	1585 Elizabeth Muckersie
0073 Paul Louden	1586 Chris Brown
0074 Jill Louden	1587 Christine McColl
0075 Duncan Smithyman	1588 Ingrid Butler
0076 Rita Bennett	1590 John Johnstone
0077 Clive Bennett	1595 Steven Grubb
0078 Greg Paterson	1596 Eric Andrew
0091 Margaret Gourlay	1597 Irene Barclay
0093 Gavin Dawson	1598 Diane Sedgwick
0094 Susan Dawson	1599 Will Golding
0095 Matthew Dawson	1600 Kasia Banaszewska-Diaz
0096 Christopher Dawson	1610 John Martin Johnston
0098 James Simpson	1611 Diane Johnston
0100 Robin Davey	1615 Claire McKenzie
0101 Evelyn Davey	1616 Alison H Buchanan
0102 D Stewart	1617 Robert Douglas Buchanan
0103 C Stewart	1621 Sheena Ramsay
0106 William Burns	1623 Marjorie Combe
0109 James Spence	1625 Ed Maddox
0126 David McArdle	1629 Gracie Johnston
0128 Elizabeth McArdle	1632 Kevin Kealy
0137 Desmond Brady	1635 J Kecheran
0139 Frank Higgins	1639 E.C Miller
0148 Sheila Reid	1643 Moraig Cassels
0151 James McQue	1644 Janet Stewart
0166 Beryl Moncrieff	1645 Christopher Scott-Jupp
0167 Douglas Allan	1648 Ruby Robb Adamson
0169 Anne Murray	1661 James Westwood
0172 Douglas Bishop	1663 Linda Fital
0174 Lorna Thompson	1664 Wayne Enwood
0175 Alan Anderson	1665 Lauren McEwan
0178 Phillip Thompson	1666 Erin Gorrie
0187 Julie Bianco	1667 Caitlin Allordice
0188 Dario Bianco	1668 Jamie Allordice
0189 Jane Stewart	1669 Paul Regan
0198 Elaine Wilkinson	1670 Tracey Regan
0203 Scott Watson	1671 Emma Cameron
0204 Gordon Laing	1672 Simmone Khanyal
0205 W Watson	1673 Billy Elviene
206 Christine Laing	1674 Sarah O'Donnell
207 Peter Mack	1677 Sarah J Bannerman
208 Fiona Mack	1678 Sophie A Bannerman
209 A. Cameron Grant	1680 Ben Love
210 Kerstin Grant	1682 Michele Stewart
214 Gillian Mackenzie	1684 Edward Gray
215 Stephen Mackenzie	1685 Layla King
216 Kenneth Ashurst	1686 Alison Gorrie
217 Evelyn Ashurst	1690 Maureen McNeill
218 Colin Ashurst	1692 David McNeill
219 Margaret Forsyth	1693 Sam Enwood

220 Robert Charles Forsyth	1694 Jean Clements
221 Jill Thomson	1696 John Clements
222 Andrew Thomson	1698 Kim Quigley
235 Andrew Stewart	1699 David McEwan
249 D.C Foggo	1700 Ayesha Quigley
250 M.A Foggo	1701 Faye Henderson
255 Jennifer Mallon	1702 Emma James
257 Alex Mallon	1703 Sophie Smith
258 Jean Barton	1704 John Paul Hannan
259 James Brown	1705 Laura Hannan
260 Kate Brown	1706 Sarah Ann Boyle
262 Douglas Reid	1707 Richard Pringle
269 Ian Macphail	1708 Celia Boyle
276 Gabi Pouso	1709 Kathryn Drinnan
278 Richard Owen	1710 Shona Pennock
279 Maurice Green	1711 Claire Miller
289 Stewart Mackinnon	1712 Jennifer Miller
296 Joyce Sneddon	1713 Thomas Smith
301 Robin Scott	1714 Sean Hanley
307 Catherine Dowds	1715 Hannah Newall
316 Gladys Morton	1716 Ross Darling
320 Alexander Valentine	1717 Gordon McKenzie
327 Douglas Marr	1718 Chris Ross
336 Tim Lear	1719 Mary Ross
351 Connie Trail	1720 Karine Pearson
352 Derek Trail	1721 Ian Henderson
356 Margaret Tracey-Bower	1722 Mary McKerrow
365 Angela Loftus	1723 James Kennedy
370 Malcolm Stewart	1724 Ellen Sherlow
379 A Robertson	1725 Gordon Brown
383 Robert Hodge	1728 Shaun Miller
387 Brian Findlay	1762 S. Charles Morrison
392 George Taylor	1775 Gavin Mears
393 Alisdair Taylor	1776 Alan Logan
395 Sue Hamilton	1779 Hazel Tyrie
399 Mary McLeod Hodge	1780 Astrid Bunne
405 Joan Proudfoot	1781 Kirsty McBirnie
417 Sonja Smith	1782 Martin Tyrie
418 John Smith	1788 Sean Robertson
422 Karen Andrew	1791 Mark Kane
429 Margaret Fenelon	1792 Jill Kane
461 Jennie Hulse	1795 Stella Robertson
466 James Douglas	1796 Darren King
469 Peter Wilson	1797 Graeme Kerr
497 Douglas Hamilton	1798 Ian Rollo
516 Jon Wilson	1799 Christine Crighton
518 Alan Wilkie	1801 Ross Crighton
527 Caroline Milne	1802 Lauren Kane
529 Jane Dickson	1803 Kayleigh Kane
530 J Macdonald	1804 Colin Dorward

545 Kenneth Rankin	1805 Jenny Muir
546 Paul Hulse	1806 Joyce Hobson
560 John Lumsden	1807 Emma Murdoch
562 Shauna Dickson	1808 Iain Murdoch
563 Kenneth Dickson	1809 Chris Kerr-Milroy
566 Helen Lumsden	1810 Sheryl McArthur
575 Robert Renton	1811 Kerry Middlemass
578 Mary Aitken	1812 Andrea Rollo
605 Andrena Crawford	1813 David Mack
606 Arthur Crawford	1814 Fiona MacDonald
607 Hugh Parker	1815 James Stead
661 Norma Kerr	1816 Wilma Mack
663 George Leslie Kerr	1817 Gary McArthur
664 Kathryn Kerr	1818 Dalvina Kerr-McIlroy
666 Patricia Kerr	1820 Diana Fakhoury
699 I B Aitken	1821 E Wilson
720 Rachel Souter	1822 Sheila Stuart
721 Jean Ann Forster	1823 Gordon Stuart
722 Paul Bullen	1824 Lindsay Wilson
723 Eileen Scott	1826 Elizabeth Berry
725 Kimberley Campbell	1827 Alasdair Swan
726 Walter Robertson	1830 Amy Gorrie
727 Nicholas Ferguson	1831 Joanne Gorrie
733 Mark Galloway	1832 Sarah Gorrie
818 Sabine Kubangel	1833 Kiera Quigley
820 Maree Bell	1834 Kenny Sime
821 Grant Cameron	1835 Caroline Sime
823 Catherine Cameron	1836 Owen Sime
824 JD Cameron	1837 Wendy McEwan
827 Laura Quinn	1838 Joseph Quigley
832 Heledd Mai Rheinallt	1839 Chris McEwan
833 Roseann Ferguson	1840 Julie Innes
834 Iain Bell	1841 Matthew McCloud
835 Eric Paulin	1842 Claire Anderson
837 Gordon Campbell	1843 Stuart Don
839 Karen Bery	1844 Brett Halley
840 Kenneth Hunter	1845 Grant Rutherford
842 Yvonne Hunter	1846 Kathryn Toon
843 Sandra Paulin	1847 James Simms
844 Colin Stewart	1848 Debbie Lonsdale
845 Anne Wimberley	1850 Cheryl Lonsdale
846 Graeme McDougall	1851 Margaret Quigley
849 Sam Denis	1853 Scott Frew
850 Jon Denis	1854 Kat Frew
853 Jennifer Stead	1855 Michael Quigley
854 Harris Wilson	1856 Julie Allardice
855 Isla Wilson	1857 Kate Allardice
856 Hannah Wilson	1858 Thomas Allardice
857 Grant Wilson	1859 Lauren Campbell
859 May Reid	1860 Jules Quigley

860 Jan Beevers	1861 Jake Quigley
861 Lorraine Henderson	1862 Phil Henderson
862 Usman Shah	1863 Patricia Henderson
863 Shona Sandison	1864 David Stevenson
864 Alastair Souter	1865 Rita Forbes
865 Nadine Robb	1866 Jake Stevenson
866 Leigh Swan	1867 Chelsea Stevenson
867 Gill Muckersie	1868 Karen Stevenson
868 Shipra Kohli	1870 Adam Forbes
869 Anne Goldie	1871 Ian Graham
870 Katie Adam	1872 Lauren Marshall
871 Steven Adam	1873 Liz Gordon
872 Cecilia Buell	1874 Scott Robertson
873 Eric Hope	1875 Nick Wise
874 I Colquhoun	1876 Lean MacIntosh
875 Hugh Colquhoun	1877 Gordon MacIntosh
876 Richard Watt	1878 Stan Fital
877 John McBain	1879 Shirley McIntosh
880 Michael Livingstone	1880 Emily Lightfoot
881 Louise Graham	1881 Steve Lightfoot
882 James Smith Tillbrook	1882 Susan Lightfoot
883 John Tripp	1883 Alison Fital
884 Donna Michelle Cook Tillbrook	1884 Kori Fital
885 Brigitte Thomas	1885 Joshua Fital
886 Sheila McDougall	1886 Antoni Fital
887 Paul Watt	1887 Niki Robertson
888 Donald W McLaren	1888 Morgan Robertson
889 Agnes Drew	1889 Kaylee Rose
890 William Hamilton	1890 Conrad Cornie
892 Elaine Smith	1891 Dean Blomfield
893 Mairi Haddow	1892 Rachel Bell
894 David Kinmond	1893 Billy Campbell
895 Lesley Brown	1896 John Barron
896 Emma Forrester	1898 Angela McIlhone
897 Joan Walker	1899 Arthur Wilson
898 Lorna Broadhurst	1900 Margaret Doull
900 Cathy Cooney	1902 Ian McKerrow
902 Rab Hallett	1903 Samir Saga
903 Julie Watt	1904 Derek Wheldon
929 Rhoda Hornig	1905 Catherine Marshall
934 Gladys Notman	1906 James Marshall
935 Jessie McMahon	1907 Philip Shinton
937 Harry Simpson	1909 Dorothy Baird
979 Ken Sandilands	1910 Nicola Newton
985 Isabella Howes	1911 Caroline Miller
989 Mairi Fenelon	1912 Lawrie Douglas
993 Kevin Fenelon	1913 Sheila Dudgeon
1021 E.J Harkness	1914 Anita Shanley
1025 R.A Harkness	1916 Siobhan Stewart
1030 Ann Stephen	1917 Carolyn Tabb

1034 Kenneth Stephen	1918 Ian Bruce
1043 Michael Fenelon	1919 Christine Bruce
1055 Gavin Davies	1920 Craig Bruce
1062 Susan Chalmers	1922 Irene MacKay
1066 Jim Ferguson	1923 Lorraine MacKay
1067 Emily Davies	1924 Heather McNab
1069 Marjorie Davies	1925 Bryan Berry
1070 Kenneth Davies	1926 Susan Lyndsay
1076 George Marple	1927 Colin Johnston
1085 Emma Marple	1928 Madge Mcintosh
1087 Carole Marple	1930 Christine Wilkinson
1101 Alison Lyon	1931 Chris Marshall
1102 George Gill	1932 S Sonohue
1107 Patricia Gill	1933 Chris Saddler
1116 Sandra Cunningham	1934 David Nelson
1126 Colin Arthur	1935 Nick Cornhill
1150 Bill Henderson	1936 Paul Wilson
1152 Lorna Henderson	1937 Linda Galloway
1153 Janet Johnston	1938 Helen Cowles
1156 Alan Johnston	1939 Mark Benaicha
1157 John Henderson	1940 Cimeon Benaicha
1158 Alison Henderson	1941 Alistair Morrice
1170 A.J.C. Clark	1942 Beatrice Morrice
1210 H Innes	1943 Caroline Milne
1211 Alison McEwan	1944 Douglas Thomson
1214 Gordon Miller	1945 Kenny Galloway
1215 S Noakes	1947 George McNab
1216 Hazel Barron	1948 Rachel Barron
1218 Lynne Brown	1949 Kenneth Barron
1219 June Henderson	1950 Richard Barron
1279 V W Stewart	1951 Kirsty Barron
1280 Craig Nolan	1952 Jacqueline Nointon
1281 Claire Sloan	1953 Nancy Tonner
1283 Helena Nolan	1962 Laura Morrison
1285 Ronald Nolan	1978 Graeme Robb
1286 Daniel Malcolm	1987 Alasdair Anderson
1287 Eilidh Nolan	1990 Cathy Summers
1289 Helena Hunter	1991 Daryl Summers
1291 Cathy Jess	1999 Linda Campbell
1293 E Lang	2005 Keith Bain
1294 Jillian Macaulay	2011 Peter Tuffy
1295 A Preston	2017 Doris Waterson
1297 Connie Di Rollo	2023 Jacqui Herbert
1298 J Summers	2024 Owen Rafferty
1299 Wilma Summers	2038 Barry Neilson
1301 John Sutherland	2049 Sarah McFarlane
1303 R Sutherland	2090 Innes McFarlane
1305 John Ward	2091 Denis Wight
1307 Maureen Heathwood	2097 Andrew Dalgleish
1311 Emma Clark	2100 Jeremy Nicoll

1313 M Watson	2102 Allan Rhynas
1350 Alan Campbell	2103 Margaret Rhynas
1353 Frances Scougall	2106 J Dewar
1354 Georgina Suckling	2109 Margaret Deans
1415 Donald Clark	2112 S Walker
1418 Rivan Buell	2121 Joyce Gilmartin
1428 Inez Paisley	2123 J Dewar
1430 Rodric Leslie	2129 Stewart Dredge
1433 Sally Leslie	2134 G Hales
1436 S Amery-Behr	2139 Russell Salton
1438 John Mears	2171 Laura Cargill
1439 Joyce Mears	2183 Ewing Grainger
1440 Aonghas McIntosh	2202 Alan Johnston
1441 Dee McIntosh	2233 E Beevers
1443 Graeme Thomson	2237 Cliff Beevers
1450 Alisdair Muckersie	2240 Teresa Martin
1452 Irene Louden	2253 Michael Martin
1454 Linda Louden	2254 N Murphy
1456 Lorna Gow	2255 K Murphy
1457 Eric Laing	2261 Peter Dawson
1458 John Horne	2262 Barry Struthers
1459 Rena Young	2263 Victoria Struthers
1460 Audrey Johnston	2286 Helen Main
1461 Sylvia Cunningham	2318 Arthur Howes
1462 Alison Clark	2329 Helen Ogg
1464 Gavin Skinner	2332 Ewan Struthers
1466 James McIntosh	2345 L John
1468 Jean McIntosh	2349 Neil Struthers
1469 Marc Summers	2355 Colin McFarlane
1470 Andrew Ross	2356 Charlie Struthers
1471 Louise Coventry	2360 Douglas Forsyth
1472 Gayle Robertson	2363 J Corglone
1473 Lesley Hind	2364 Andy Stewart
1474 Susan Ireland	2374 Rosalind Salton
1475 Kevin Higgins	2379 P John
1476 Jolon Dixon	2439 Michael Gilmartin
1477 Emma Saunders	2441 Elayne Gilmartin
1478 Lindsay Cockburn	2442 P Cooper
1479 Stephanie McLaren	2452 Fiona Struthers
1492 Richard Mitchell Henderson	2455 W Cooper
1507 Jacqueline McCafferty	2466 Kristina Vysotskaja
1508 Daniel O'Donnell	2469 Andrew Naylor
1509 Anne O'Donnell	2487 John Nicolson
1510 Connor Johnston	2509 Michael J Gilmartin
1511 Bobbie Ainslie	2511 Fiona Gilmartin
1512 Karen Hill	2513 V Walker
1513 Barry Hill	2519 Thelma Ingram
1514 Peter Hay	2520 Christine Struthers
1515 Marc Wilson	2573 Ryan Mcwilliam
1516 William McCathie	2578 Keri Lobban

1517 J McCathie	2579 William Lobban
1519 Michael Haldane	2587 Elizabeth Lobban
1520 Findlay Elder	2588 Jacqueline Lobban
1521 Jean Elder	2591 Stephanie Russell
1522 K Morrison	2601 Janet Russell
1524 S Dignan	2610 Marie Robertson
1525 W Morrison	2626 Jack Millar
1528 M Davie	2638 Joyce Clingan
1529 Scott Robertson	2643 Caroline Ritchie
1530 Gordon Ross	

Issue 13 Appendix D - HSG 31 Curriemuirend and GS10

0269	Ian Macphail	1618	Ross Pearson
0858	Judith Hill	1619	Mark Pearson
1520	Findlay Elder	1620	Bernard Ramsay
1521	Jean Elder	1621	Sheena Ramsay
1522	K Morrison	1623	Marjorie Combe
1525	W Morrison	1624	Marilyn Shepherd
1528	M Davie	1625	Ed Maddox
1536	H Shaw	1626	Laura Ferguson
1539	Annika Nordstrom	1628	Melissa Begg
1540	Brian Fulton	1629	Gracie Johnston
1546	Pamela Coovert	1630	William Johnston
1548	Alex Robinson	1631	Helen Pearson
1550	Elaine Merrilees	1632	Kevin Kealy
1582	Lynsey Inglis	1633	Elaine Wilson
1584	Ewan Drysdale	1634	E Kecheran
1602	Eilidh Mears	1635	J Kecheran
1603	Elizabeth A Gilmour	1636	Stuart McVie
1604	Marcus Manson	1637	Alison McVie
1605	K McNaughton	1639	E.C Miller
1606	S Charles Morrison	1640	J Loch
1607	A.S Paisley	1641	M Heigh
1608	Judith Benton	1643	Moraig Cassels
1609	Anne Macnab	1644	Janet Stewart
1610	John Martin Johnston	1645	Christopher Scott-Jupp
1611	Diane Johnston	1647	Mary Paterson
1613	Derek Moir	1648	Ruby Robb Adamson
1615	Claire McKenzie	1649	M I MacNamara
1616	Alison H Buchanan	1650	Moira Young
1617	Robert Douglas Buchanan	2459	Neil Ingram

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		

Issue 17 Appendix B – Winton Gardens

0795	Amanda Griffin	2314	Moira Scott
0829	Richard Playfair	2326	Sarah J Kinnear
1734	James Houston	2369	H A Campbell
1744	Gordon Kinnear	2370	M Campbell
1965	James Robertson	2375	Jeremy Whitley
1972	Anne Brownie	2376	Robina Doyle
1977	Allan Brownie	2377	Christopher Kenmore
1982	Rosemary Playfair	2394	Richard Sparks
1997	Alison Gault	2399	Richard Bath
2021	Patricia Irving	2400	John Crawford
2032	Dawn Blaik	2418	Tessa Whitley
2145	Lisa Kinnear	2429	John Griffin
2147	Andrew Renton	2431	William Blair
2152	David Alan Pickup	2444	Audrey C S Ryan
2167	Graeme Watherstone	2449	David Elder
2176	Tony Quade	2496	George L Gault
2184	Morag Murison	2524	Phil Hobbins
2185	Craig Murison	2525	Lynn Hobbins
2203	Alan Heron	2526	Ronny Strachan
2204	Alex Justice	2550	Gerald Granger
2211	Harold Feather	2590	Doreen Patterson
2212	Sandra Feather	2604	William Robb
2223	John Henderson	2607	Iain Smith
2243	Janice Hutchinson	2611	Elaine Aitken
2245	Alistair Bowman	2623	Phillip Newlands
2259	Graham Mair	2655	Christopher Sayer
2302	Graeme Danskin		

Issue 18 Appendix A – East Suffolk Road

0115	Francesca Bray	0375	M.J.R Simpson
0116	Alexander Robertson	0377	Jane Darling
0138	Peter Laing	0389	Elsbeth Dougall
0144	Frances Grieve	0394	Ann Simpson
0146	Ronald Macarthur	0410	Gerald McGovern
0149	Hilary Spenceley	0419	Rosemary Langeland
0150	William Grieve	0441	Graham Doherty
0152	Alison Riach	0486	Muriel Evans
0154	John O'Brien	0502	Mark Dewar
0157	Albert Clowes	0504	Brian Bain
0158	Marilyn Higgins	0538	Andrew Ranicki
0159	Sallie Clowes	0539	Ida Thompson
0168	L. Ben Brahim Lotfi	0558	Mervyn Jack
0177	P M Williams	0565	Deborah Adlam
0179	Neil Clifton	0569	Valerie Akhtar
0197	Stanley Davidson	0583	Ian Green
0199	Luz Maria Buckland	0612	Jacqueline Johnson
0200	Hilary McGuire	0633	Jean McMillan
0201	Kay Boulton	0706	Flora Wotherspoon
0202	Ian WR Malcolm	0851	Kate Dewar
0211	Lionel Jackson	0925	Margaret Hunter
0212	David Ainslie Thin	0930	T.E Dickson
0213	Shona McLean	0976	Tim Mckay
0226	Will Hean	0977	Sheila Kirk
0227	John Kelly	1032	Brian Johnston
0237	Peredur Williams	1047	R.J.M Wilson
0238	Dale Finlayson	1105	Rosa Bisset
0251	Emily Owen	1111	Sheila Burtles
0268	Morag Yellowlees	1115	Richard Burtles
0272	Patricia Bagheri	1117	St Clair Taylor
0273	Jenny Dewar	1119	Peter Bloomfield
0274	Colette Backwell	1145	John Forrest
0290	Rana Sallam	1448	Valery Devlin
0291	Jean Burns	1486	Imogen Dewar
0292	Patrick Prenter	1651	Alan Dewar
0293	Wilma Elton	2050	Andrew Johnson
0294	Robert Wilton	2059	Catriona Kelly
0299	Ian Murray	2071	Mike Mitchell
0304	DC McKean	2113	Charles Aspinall
0313	Lilias Thain	2232	Sean Keaveney
0317	SJ Closs	2258	Lindsey Harkins
0318	John Mykura	2338	Fraser Nevett
0319	I Maxwell	2340	Iain Gordon
0325	Elizabeth Philp	2361	Tim Arnold
0348	G Walker	2378	Rachel Jones
0349	David Michie	2448	Katherine Ivory
0353	Diana Philipson	2523	Merrilie Cameron
0361	Anne Semple	2537	Allen Simpson

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												2013 to 2024
				March 2013	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	
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 Ph	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
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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
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

DEVELOPMENT PLAN SCHEME

MAY 2015

Contents

What is a Development Plan Scheme?
What is a Development Plan?
Current Local Plans in Edinburgh
Edinburgh's Local Development Plan
 Purpose
 Progress to date
 Timetable
Participation Statement
Contact

What is a Development Plan Scheme?

This leaflet is a Development Plan Scheme. It sets out the programme for preparing Edinburgh's first Local Development Plan. It includes:

- an explanation of what a Local Development Plan is;
 - an update of progress to date in preparing the Local Development Plan;
 - an updated programme for the next steps in preparing the Local Development Plan;
- and
- a Participation Statement which sets out when and how you can get involved.

This is the Council's ninth Development Plan Scheme. It replaces one published in June 2014.

What is a Development Plan?

The planning system has an impact on everyone. Government requires Councils to prepare development plans which are the basis for decision making on planning applications. They contain a strategy for the future development of an area and set out policies and proposals to guide future development and use of land.

Decisions on how and where development will take place in Edinburgh are influenced by the following statutory documents:

The National Planning Framework: this sets out, at the national level, the Scottish Government's strategy for the country's spatial development, including schemes of national importance. The third NPF was published in June 2014.

A Strategic Development Plan: these are produced for Scotland's four largest city regions. They set out a long term (20 years or more) spatial planning strategy indicating in broad terms where future development will be located and what's required to deliver it. The Strategic Development Plan for South East Scotland was approved in June 2013. It was prepared by the Strategic Development Plan Authority for Edinburgh and South East Scotland (SESplan). The six councils which are members of SESplan are Edinburgh, East Lothian, Fife, Midlothian, Scottish Borders and West Lothian. Supplementary guidance setting out increased housing land requirements was adopted in autumn 2014.

A Local Development Plan: these are produced by the local planning authorities and set out more detailed policies and proposals to guide development. These plans are adopted by the

planning authority and must accord with the approved Strategic Development Plan and seek to implement its requirements on a site-specific basis. When the Edinburgh Local Development Plan is adopted, it will replace two existing local plans.

The Strategic Development Plan, together with the Local Development Plan and any associated supplementary guidance, form the statutory Development Plan.

Current Local Plans in Edinburgh

The Edinburgh area is currently covered by two local plans:

- Edinburgh City Local Plan (ECLP), which was adopted in January 2010.
www.edinburgh.gov.uk/eclp
- Rural West Edinburgh Local Plan (RWELP), which was adopted in 2006 (alteration adopted in June 2011).
www.edinburgh.gov.uk/rwelp

The area the two plans cover is set out in Figure 1.

Local Development Plan

Purpose

The purpose of the Local Development Plan is to:

- provide a clear basis for determining planning applications
- allocate land to meet the needs and targets set out in the Strategic Development Plan for the wider city region (the SESplan area).

Progress

Since the publication of the first Development Plan Scheme in 2009, preparation of the Local Development Plan has progressed. The Main Issues Report, accompanied by an Environmental Report and Monitoring Statement, was published in October 2011 to seek views on the policy and development options that could be included in the Local Development Plan.

At the Main Issues Report stage, we consulted a wide range of stakeholders - members of the public, Community Councils and groups, private businesses, key consultation agencies, neighbouring authorities and the Scottish Government. We used a number of different methods to make people aware of the Main Issues Report and to encourage them to get involved in the LDP process. This was the main consultation stage for the project and responses were published online in April 2012 (see www.edinburgh.gov.uk/localdevelopmentplan).

The Main Issues Report responses informed the preparation of a Proposed LDP. This was approved in March 2013 and published in May for a six week period in which formal representations could be submitted. Those representations are available online.

Since preparation of the Proposed LDP the Strategic Development Plan was approved by Scottish Ministers with changes. These included a larger housing land requirement and greater scope for large housing sites outwith the main development areas. As a result SESplan prepared supplementary guidance setting out how much housing land needed to be provided by each Local Development Plan. The changes meant that the LDP needed to provide more housing land. Doing so changed the spatial strategy of the LDP which meant that a new Second Proposed Plan had to be prepared. This Second LDP, informed by responses received on the first Proposed LDP, was approved in June 2014 and published in August for a six week period where formal representations could be submitted.

Representations were received from 2,500 individuals and organisations during this period and these have been made available online.

Timetable

The Second Proposed LDP, accompanied by a summary of unresolved representations, has been approved for submission to Scottish Ministers with a request for them to appoint a reporter to undertake an examination. Thereafter Scottish Ministers will commence an examination of the Plan. The examination is to independently test the issues arising from the unresolved representations made on the Second Proposed LDP. It will focus on the issues raised rather than every individual representation. A report from the examination is expected within 6 to 9 months of submission.

Strategic Development Plan (SDP)

The key stages in the SDP and its supplementary guidance process are:

- November - December 2011 Published Proposed SDP and received representations
- January – June 2012 Considered representations and prepared SESplan response (schedule 4 forms)
- August 2012 Submitted Proposed SDP to Scottish Ministers
- October 2012 Examination Started
- April 2013 Report of Examination published
- June 2013 Approval of SDP by Scottish Ministers
- November 2013 Draft Supplementary Guidance published for consultation
- March 2014 Finalised Supplementary Guidance approved by SESplan Joint Committee
- May 2014 Finalised Supplementary Guidance submitted to Ministers
- October 2014 Supplementary Guidance adopted by SESplan
- May 2015 Publication of Strategic Development Plan 2 Main Issues Report
- July-September 2015 Consultation on Main Issues Report

Local Development Plan (LDP)

The timetable for the process is set out in the following table.

Stage	Timetable for May 2015 DPS
MIR consultation	October 2011 - January 2012
Report first Proposed Plan	March 2013
Period for representations	May – June 2013
Published representations & new DPS	October 2013
Report Second Proposed Plan	June 2014
Period for representations	August – October 2014
Report representations	May 2015
Submit Plan & Schedules to Scottish Ministers	May 2015
Report of Examination	November 2015*
Adoption	April 2016*

*Timescales are based on target examination time of 6-9 months and guidance on post-examination timescales.

Participation Statement

The following section sets out how we intend to engage with the public and other stakeholders in the Local Development Plan process.

- Everyone who submitted responses to the Second Proposed LDP, the Proposed LDP or the Main Issues Report will be notified that the LDP has been submitted to Scottish Ministers and that they have appointed reporters.
- A copy of the submitted plan will be available for inspection at all public libraries and the Council planning office.
- A summary of unresolved representations will be provided online.
- While the Proposed Plan is being considered by Scottish Ministers the Council's website will be kept up-to-date. Information about the current stage of an examination is also available from the Scottish Government at <http://www.dpea.scottish.gov.uk>
- Await the report of examination in 6 to 9 months, and potentially respond to any requests for further information or hearing session(s) from the reporter.
- On receipt of the report, make any modifications it recommends (which are largely binding on the Council) and notify all those who made representations to the Second Proposed Plan.

We will then adopt the LDP in that modified form.

To find out more about community engagement in the LDP project:

Irene Beautyman at irene.beautyman@edinburgh.gov.uk

Add yourself to the LDP mailing list *(if you submitted comments at the Main Issues Report stage or representations to the first or Second Proposed Plan you will already be on our list)*

localdevelopmentplan@edinburgh.gov.uk

Questions about the content of current local plans or the LDP:

Ben Wilson, Team Manager at ben.wilson@edinburgh.gov.uk

or contact us by post

**Local Development Plan project team,
Waverley Court (G3),
4 East Market Street,
Edinburgh EH3 8BG**

Planning Committee

1.00 pm, Thursday, 19 June 2014

Present

Councillor Perry (Convener), Howat (Vice-Convener), Bagshaw, Blacklock, Brock, Child, Dixon, Heslop, McVey, Mowat, Robson, Rose and Ross.

1. Local Development Plan: Second Proposed Plan

At its meeting on 12 June 2014 the Planning Committee continued consideration of the Local Development Plan: Second Proposed Plan to allow the decision of the Scottish Minister on the Strategic Development Plan Supplementary Guidance on Housing Land to be received.

The Acting Head of Planning and Building Standards advised that the decision on the Supplementary Guidance on Housing Land had now been received & consideration of the Local Development Plan, second proposed plan could proceed.

The Acting Head of Planning and Building Standards presented the proposals in the second proposed plan.

Motion

1. Committee agrees the recommendations at paragraph 1.1 of the report by the Acting Director of Services for Communities, with minor clarifications and adjustments, as per the text of the Motion below.
2. Committee notes that, provided parties who made representations on the first proposed plan (LDP1) resubmit representations as appropriate on the second proposed plan (LDP2), the Committee will have an opportunity to consider all such representations at the next stage in a meaningful way and in the context of the Strategic Development Plan's increased housing land requirement.
3. Committee instructs the Acting Head of Planning and Building Standards to inform all those who made representations to the first Proposed Plan (LDP1) that they need to resubmit their representations, as required by legislation, and offer any assistance that they may require.
4. Committee further notes that, notwithstanding the requirement on the Development Management Sub-Committee to determine planning applications, for any assessment of Greenfield or existing open space housing sites, prematurity shall be a material consideration in any such determination.

5. Committee further instructs the Acting Head of Planning and Building Standards to re-assess the site referred to as 'East of Milburn Tower' on the following basis:
 - a. The proposed site lies predominantly within the West Edinburgh Strategic Development Area. The strategic development plan states that there is a policy presumption for directing any new housing releases to SDA's;
 - b. The site has good accessibility to existing public transport. There are four easily accessible Tram stops (Edinburgh Park Station, Edinburgh Park Central, Gyle Centre and Gogarburn) and there are existing bus services that serve Edinburgh, Gyle Centre and the RBS headquarters. It would also be feasible to route a bus through the site. Mainline train stations also afford the area additional public transport opportunities. The southern part of the site has access to Hermiston Park & Ride facility. Direct pedestrian access to Edinburgh Park can be provided through the existing under pass and path next to the culvert;
 - c. A clear and defensible green belt boundary can be formed by dense and mature woodland along Gogar Station Road at the western edge of the site. The southern part of the site is more open but already partly developed and the existing tree belt could be extended. The M8 motorway provides a clear edge to the site at the southern and south western end;
 - d. The site integrates well with existing centres of employment, retail and existing public transport. The eastern boundary is aligned with Edinburgh Park and the northern boundary would afford greater integration with the proposed International Business Gateway (IBG)
 - e. The site is contained and not visible from most surrounding areas. Although the site is visible from the north on Glasgow Road this is generally by vehicular travellers who are passing quickly and through an area that will change significantly as the International Business Gateway (IBG) is developed. The ground level of the site is below the road and important views to the Pentland Hills can be preserved.
6. Committee instructs the Acting Head of Planning and Building Standards to report back to the Committee on his re-assessment of the "east of Milburn Tower" site, including a revised Transport Appraisal and Education Appraisal which will set out the infrastructure requirements to achieve high settlement integration and a sustainable community, when Committee considers representations received on the second proposed plan.
7. Committee notes the requirement to have in place sufficient infrastructure to facilitate the level of housing development, and the associated community needs (health, transport, education, retail, community hub, etc). These should be identified and costed, with a budget provision identified through the Corporate Action Programme, and have an agreed implementation date before housing development is initiated.
8. Committee reaffirms its commitment to protecting as much of the Green Belt as possible; and notes that 74% of the homes within the Plan are expected to be built on Brownfield sites.

9. 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.
 10. Granton Waterfront Central Development Area (EW 2b) should continue to be developed as a housing led-mixed use development creating a sense of place and community. The section relating to EW 2b of the Granton Waterfront Development Principles should have added "The potential to enhance employment and a 'destination' through existing and new commercial, tourist and retail opportunities should be expressly encouraged".
- Moved by Councillor Perry, seconded by Councillor Brock.

Amendment 1

Committee notes the detailed work that has been undertaken to prepare the Local Development Plan; the thoroughness of this and thanks officers for this work which has been undertaken in response to a new process requiring response to National Planning Policy and the Strategic Development Plan and that this is the first time the process has been worked through and the challenges that have arisen from this. This process has been lengthy, complex and has not produced a plan that will "make Edinburgh the very best it can be".

The City has previously agreed a vision for the future of the City (A Vision for Capital Growth 2020 -2040) which accommodates growth along clearly defined public transport corridors thus allowing the City to grow; to share the wealth and the benefits of the City with those who have grown up in the City and wish to set up their own households and with people who wish move into the City to take advantage of all it has to offer.

Due to the requirement to allocate additional housing as a result of the Scottish Government's rejection of the first proposed Strategic Development Plan the proposed plan does not clearly articulate this vision. The revised SESPlan requires the allocation of such significant additional housing that in order to protect Edinburgh's green spaces and to allow development in a sustainable manner a new plan, rather than a revised plan which simply adds in additional housing to a plan which was at its limit, should be developed.

The Plan as currently proposed will cause additional congestion and, due to the significant amount of housing required, has allocated housing in areas that do not have the infrastructure to support new housing which will render this housing unattractive for new residents and place significant pressures upon existing residents overloading services such as schools and health centres and reducing amenity for residents. There are concerns that making such significant allocations will mean greenbelt land will be designated for housing before available brownfield land has been fully built out and given the lower costs of developing greenfield and greenbelt land this is likely to lead to development of these areas before available brownfield land is used because there are no means available to the Council to prevent this happening.

The Plan should make clear the type of development that will be possible in Edinburgh to maximise land usage and release the minimum necessary greenbelt and greenfield land. The Plan should guide developers as to what type of development is acceptable - it must be high quality, well designed dense development that creates a sense of place with the necessary facilities easily available to residents; it should contain sufficient numbers of dwellings to support new facilities in areas where existing ones would be overburdened. Edinburgh has many examples of areas where housing is dense but highly desirable to live in which create healthy communities, such as the colonies and traditional tenements of 4 or 5 storeys. The City should be confident in its heritage and seek to reinterpret these traditional and local forms as an Edinburgh vernacular for the 21st century. It should be noted that requiring higher densities will allow less land in total to be required and that development returns per hectare should be higher.

Committee therefore:

1. Rejects the proposed Local Development Plan;
 2. Instructs officers to bring forward new proposals which accommodate development firstly on brownfield sites and then along fixed rail transport corridors both existing and proposed in two cycles;
 3. Encourages a significantly higher density (c.70 - 80 dwellings per hectare) than has been allowed in the plan with provision for adequate services either in supporting existing local centres which would benefit from additional users or by creating new local centres supported by sufficient housing to provide local employment, retail, education, community and health facilities;
 4. Requires the Convenor to raise the following matters with Scottish Ministers; a review of the planning process which has proved to be cumbersome, slow and confusing; consideration of how the effective housing land supply can be better calculated so that brownfield sites can be prioritised; how the HNDA can be modified in order that future plans do not require such large amounts of land to be allocated leading to further unsustainable releases of land.
- Moved by Councillor Mowat seconded by Councillor Hyslop.

Amendment 2

1. Recognises the established need for more affordable housing in the city;
2. Recognises the unrealistic nature of the identified housing requirement for 107,000 homes in the South East of Scotland which significantly exceeds all recent rates of construction;
3. Notes the need to bring back into use the up to 2,000 homes in Edinburgh which lie empty for more than 6 months, to re-examine housing densities, and to give priority to housing in existing urban areas in order to make full use of brownfield land;
4. Recognises that the changing demography of the city region and the way that it is reflected in household formation is unlikely to be best-fulfilled by building low density housing in suburban estates.

5. Recognises that if the citizens of Edinburgh are to have faith in the planning process and local democracy in general, genuine account must be taken of their views on the proposed LDP;
 6. Recognises that the impact of the LDP on transport, schools, the environment and air quality have not been adequately addressed;
 7. Concludes therefore that the city's current housing requirements can be met by the use of brownfield land and that there is at present no need for the inclusion of any of the greenfield sites set out in the plan;
 8. Consequently, agrees the recommendations at paragraph 1.1 of the above report, subject to the removal of the greenfield allocations, and calls for urgent talks with Scottish ministers to resolve the issues raised.
- Moved by Councillor Bagshaw, seconded by Councillor Ross

Voting

- | | | |
|-----------------|---|---------|
| For the motion | - | 8 votes |
| For amendment 1 | - | 3 votes |
| For amendment 2 | - | 1 vote |

Decision

1. Committee agrees the recommendations at paragraph 1.1 of the report by the Acting Director of Services for Communities, with minor clarifications and adjustments, as per the text of the Motion below.
2. Committee notes that, provided parties who made representations on the first proposed plan (LDP1) resubmit representations as appropriate on the second proposed plan (LDP2), the Committee will have an opportunity to consider all such representations at the next stage in a meaningful way and in the context of the Strategic Development Plan's increased housing land requirement.
3. Committee instructs the Acting Head of Planning and Building Standards to inform all those who made representations to the first Proposed Plan (LDP1) that they need to resubmit their representations, as required by legislation, and offer any assistance that they may require.
4. Committee further notes that, notwithstanding the requirement on the Development Management Sub-Committee to determine planning applications, for any assessment of Greenfield or existing open space housing sites, prematurity shall be a material consideration in any such determination.
5. Committee further instructs the Acting Head of Planning and Building Standards to re-assess the site referred to as 'East of Milburn Tower' on the following basis:

- f. The proposed site lies predominantly within the West Edinburgh Strategic Development Area. The strategic development plan states that there is a policy presumption for directing any new housing releases to SDA's;
 - g. The site has good accessibility to existing public transport. There are four easily accessible Tram stops (Edinburgh Park Station, Edinburgh Park Central, Gyle Centre and Gogarburn) and there are existing bus services that serve Edinburgh, Gyle Centre and the RBS headquarters. It would also be feasible to route a bus through the site. Mainline train stations also afford the area additional public transport opportunities. The southern part of the site has access to Hermiston Park & Ride facility. Direct pedestrian access to Edinburgh Park can be provided through the existing under pass and path next to the culvert;
 - h. A clear and defensible green belt boundary can be formed by dense and mature woodland along Gogar Station Road at the western edge of the site. The southern part of the site is more open but already partly developed and the existing tree belt could be extended. The M8 motorway provides a clear edge to the site at the southern and south western end;
 - i. The site integrates well with existing centres of employment, retail and existing public transport. The eastern boundary is aligned with Edinburgh Park and the northern boundary would afford greater integration with the proposed International Business Gateway (IBG);
 - j. The site is contained and not visible from most surrounding areas. Although the site is visible from the north on Glasgow Road this is generally by vehicular travellers who are passing quickly and through an area that will change significantly as the International Business Gateway (IBG) is developed. The ground level of the site is below the road and important views to the Pentland Hills can be preserved.
6. Committee instructs the Acting Head of Planning and Building Standards to report back to the Committee on his re-assessment of the "east of Milburn Tower" site, including a revised Transport Appraisal and Education Appraisal which will set out the infrastructure requirements to achieve high settlement integration and a sustainable community, when Committee considers representations received on the second proposed plan.
7. Committee notes the requirement to have in place sufficient infrastructure to facilitate the level of housing development, and the associated community needs (health, transport, education, retail, community hub, etc). These should be identified and costed, with a budget provision identified through the Corporate Action Programme, and have an agreed implementation date before housing development is initiated.
8. Committee reaffirms its commitment to protecting as much of the Green Belt as possible; and notes that 74% of the homes within the Plan are expected to be built on Brownfield sites.

9. 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.
 10. Granton Waterfront Central Development Area (EW 2b) should continue to be developed as a housing led-mixed use development creating a sense of place and community. The section relating to EW 2b of the Granton Waterfront Development Principles should have added “The potential to enhance employment and a ‘destination’ through existing and new commercial, tourist and retail opportunities should be expressly encouraged”.
- Moved by Councillor Perry, seconded by Councillor Brock.

(References – Planning Committees 19 March 2013 (Item 1), 3 October 2013 (Item 2), 23 October 2013 (Item 3), to Corporate Policy and Strategy Committee 4 December 2012 (Item 9); 12 June 2014 (Item 2); reports by the Acting Director of Services for Communities, submitted.)

2. Declaration of Interests

Councillor Ross declared a non-financial interest in the above item as a director of EDI, PARC Craigmillar, Shawfair Developments and Waterfront Edinburgh.