

Customer Ref: 01728 Response Ref: ANON-KU2U-GWFQ-V
Name: Oliver Munden
Response Type: Agent / Consultant
On behalf of: Hillend Leisure Ltd

Supporting Info: Yes
Email: oliver.munden@avisonyoung.com

Choice 1 A

We want to connect our places, parks and green spaces together as part of a city-wide, regional, and national green network. We want new development to connect to, and deliver this network. Do you agree with this? - Select support / don't support

Short Response: Not Answered

Explanation: Not Answered

Choice 1 B

We want to change our policy to require all development (including change of use) to include green and blue infrastructure. Do you agree with this? - Support / Object

Short Response: Not Answered

Explanation: See rep

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On behalf of:

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Choice 1 C

We want to identify areas that can be used for future water management to enable adaptation to climate change. Do you agree with this? - Yes / No

Short Response

Explanation

Choice 1 D

We want to clearly set out under what circumstances the development of poor quality or underused open space will be considered acceptable. Do you agree with this? - Yes / No

Short Response

Explanation

Choice 1 E

We want to introduce a new 'extra-large green space standard' which recognises that as we grow communities will need access to green spaces more than 5 hectares. Do you agree with this? - Yes / No

Short Response

Explanation

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Response Type

On behalf of:

Supporting Info

Email

Choice 1 F

We want to identify specific sites for new allotments and food growing, both as part of new development sites and within open space in the urban area. Do you agree with this? - Yes / No

Short Response

Explanation

Choice 1 F

We want to identify specific sites for new allotments and food growing, both as part of new development sites and within open space in the urban area. Do you agree with this? - Upload (max size 3mb)

Short Response

Explanation

Choice 1 G

We want to identify space for additional cemetery provision, including the potential for green and woodland burials. Do you agree with this? - Yes / No

Short Response

Explanation

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Supporting Info

Email

Choice **1 H**

We want to revise our existing policies and green space designations to ensure that new green spaces have long term maintenance and management arrangements in place. Do you agree with this? - Yes/No

Short Response

Explanation

Choice **2 A**

We want all development (including change of use), through design and access statements, to demonstrate how their design will incorporate measures to tackle and adapt to climate change, their future adaptability and measures to address accessibility for people with varying needs, age and mobility issues as a key part of their layouts. - Yes / No

Short Response

Explanation

Choice **2 B**

We want to revise our policies on density to ensure that we make best use of the limited space in our city and that sites are not under-developed. Do you agree with this? - Yes / No

Short Response

Explanation

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On behalf of:

Supporting Info

Email

Choice **2 C**

We want to revise our design and layout policies to achieve ensure their layouts deliver active travel and connectivity links. Do you agree with this? - Yes / No

Short Response

Explanation

Choice **2 D**

We want all development, including student housing, to deliver quality open space and public realm, useable for a range of activities, including drying space, without losing densities. Do you agree with this? - Yes / No

Short Response

Explanation

Choice **3 A**

We want all buildings and conversions to meet the zero carbon / platinum standards as set out in the current Scottish Building Regulations. Instead we could require new development to meet the bronze, silver or gold standard. Which standard should new development in Edinburgh meet? - Which standard?

Short Response

Explanation

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On behalf of:

Supporting Info

Email

Choice **4 A**

We want to work with local communities to prepare Place Briefs for areas and sites within City Plan 2030 highlighting the key elements of design, layout, and transport, education and healthcare infrastructure development should deliver. Do you agree with this? - Yes / No

Short Response

Explanation

Choice **4 B**

We want to support Local Place Plans being prepared by our communities. City Plan 2030 will set out how Local Place Plans can help us achieve great places and support community ambitions. - How should the Council work with local communities to prepare Local Place Plans?

Short Response

Explanation

Choice **5 A**

We want City Plan 2030 to direct development to where there is existing infrastructure capacity, including education, healthcare and sustainable transport, or where potential new infrastructure will be accommodated and deliverable within the plan period. Do you agree with this? - Yes / No

Short Response

Explanation

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Response Type

On behalf of:

Supporting Info

Email

Choice **5 B**

We want City Plan 2030 to set out where new community facilities are needed, and that these must be well connected to active travel routes and in locations with high accessibility to good sustainable public transport services. Do you agree with this? - Yes / NO

Short Response

Explanation

Choice **5 C**

We want to reflect the desire to co-locate our community services close to the communities they serve, supporting a high walk-in population and reducing the need to travel. Do you agree with this? - Yes / No

Short Response

Explanation

Choice **5 D1**

We want to set out in the plan where development will be expected to contribute toward new or expanded community infrastructure. Do you agree with this? - Yes / No

Short Response

Explanation

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On behalf of:

Supporting Info

Email

Choice 5 D2

We want to use cumulative contribution zones to determine infrastructure actions, costs and delivery mechanisms. Do you agree with this? - Yes / No

Short Response

Explanation

Choice 5 E

We want to stop using supplementary guidance and set out guidance for developer contributions within the plan, Action Programme and in non-statutory guidance. Do you agree with this? - Yes / No

Short Response

Explanation

Choice 6 A

We want to create a new policy that assesses development against its ability to meet our targets for public transport usage and walking and cycling. These targets will vary according to the current or planned public transport services and high-quality active travel routes. Do you agree with this? - Yes / No

Short Response

Explanation

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Supporting Info

Email

Choice **6 B**

We want to use Place Briefs to set the targets for trips by walking, cycling and public transport based on current and planned transit interventions. This will determine appropriate parking levels to support high use of public transport. Do you agree with this? - Yes / No

Short Response

Explanation

Choice **7 A**

We want to determine parking levels in development based on targets for trips by walking, cycling and public transport. These targets could be set by area, development type, or both and will be supported by other measures to control on-street parking. Do you agree with this? - Yes / No

Short Response

Explanation

Choice **7 B**

We want to protect against the development of additional car parking in the city centre to support the delivery of the Council's city centre transformation programme. Do you agree with this? - Yes / No

Short Response

Explanation

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On behalf of:

Choice **7 C**

We want to update our parking policies to control demand and to support parking for bikes, those with disabilities and electric vehicles via charging infrastructure. Do you agree with this? - Yes / No

Short Response

Explanation

Choice **7 D**

We want to support the city's park and ride infrastructure by safeguarding sites for new park and ride and extensions, including any other sites that are identified in the City Mobility Plan or its action plan. Do you agree with this? - We want to support the city's park and ride infrastructure by safeguarding sites for new park and ride and extensions, including any other sites that are identified in the City Mobility Plan or its action plan.

Short Response

Explanation

Choice **8 A**

We want to update our policy on the Cycle and Footpath Network to provide criteria for identifying new routes. Do you agree with this? - Yes / No

Short Response

Explanation

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Choice **8 B**

As part of the City Centre Transformation and other Council and partner projects to improve strategic walking and cycling links around the city, we want to add the following routes (along with our existing safeguards) to our network as active travel proposals to ensure that they are delivered. Do you agree with this? - Yes / No

Short Response

Explanation

Choice **8 C**

We want City Plan 2030 to safeguard and add any other strategic active travel links within any of the proposed options for allocated sites. We also want the City Plan 2030 to include any new strategic active travel links which may be identified in the forthcoming City Plan 2030 Transport Appraisal, the City Mobility Plan, or which are identified through this consultation. Do you agree with this? - Yes / No

Short Response

Explanation

Choice **8 C**

We want City Plan 2030 to safeguard and add any other strategic active travel links within any of the proposed options for allocated sites. We also want the City Plan 2030 to include any new strategic active travel links which may be identified in the forthcoming City Plan 2030 Transport Appraisal, the City Mobility Plan, or which are identified through this consultation. Do you agree with this? - Upload new cycle routes

Short Response

Explanation

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Choice 9 A

We want to consult on designating Edinburgh, or parts of Edinburgh, as a 'Short Term Let Control Area' where planning permission will always be required for the change of use of whole properties for short-term lets. Do you agree with this approach? - Yes / No

Short Response

Explanation

Choice 9 B

We want to create a new policy on the loss of homes to alternative uses. This new policy will be used when planning permission is required for a change of use of residential flats and houses to short-stay commercial visitor accommodation or other uses. Do you agree with this? - Yes / No

Short Response

Explanation

Choice 10 A

We want to revise our policy on purpose-built student housing. We want to ensure that student housing is delivered at the right scale and in the right locations, helps create sustainable communities and looks after student's wellbeing. Do you agree with this? - Yes / No

Short Response

Explanation

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Choice **10 B**

We want to create a new policy framework which sets out a requirement for housing on all sites over a certain size coming forward for development. Do you agree with this? - Yes / No

Short Response

Explanation

Choice **10 C**

We want to create a new policy promoting the better use of stand-alone out of centre retail units and commercial centres, where their redevelopment for mixed use including housing would be supported. Do you agree with this? - Yes / No

Short Response

Explanation

Choice **11 A**

We want to amend our policy to increase the provision of affordable housing requirement from 25% to 35%. Do you agree with this approach? - Yes / No

Short Response

Explanation

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Choice 11 B

We want City Plan 2030 to require a mix of housing types and tenures – we want the plan to be prescriptive on the required mix, including the percentage requirement for family housing and support for the Private Rented Sector. Do you agree with this? - Yes / No

Short Response: Not Answered

Explanation: Not Answered

Choice 12 A

Which option do you support? - Option 1/2/3

Short Response: Not Answered

Explanation:

Choice 12 B1

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Support - Calderwood

Short Response: Not Answered

Explanation:

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Name
Response Type
On behalf of:

Supporting Info

Email

Choice **12 B2**

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Support - Kirkliston

Short Response

Explanation

Choice **12 B3**

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Support - West Edinburgh

Short Response

Explanation

Choice **12 B4**

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Support - East of Riccarton

Short Response

Explanation

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Supporting Info

Email

Choice **12 B5**

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Support - South East Edinburgh

Short Response

Explanation

Choice **12 B6**

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Object - Calderwood

Short Response

Explanation

Choice **12 B7**

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Object - Kirkliston

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **12 B8**

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Object - West Edinburgh

Short Response

Explanation

Choice **12 B9**

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Object - East of Riccarton

Short Response

Explanation

Choice **12 B10**

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Object - South East Edinburgh

Short Response

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **12 BX**

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Explain why

Short Response

Explanation

Choice **12 C**

Do you have a greenfield site you wish us to consider in the proposed Plan? - Greenfield file upload

Short Response

Explanation

Choice **12 C**

Do you have a greenfield site you wish us to consider in the proposed Plan? - Greenfield file upload

Short Response

Explanation

Customer Ref: Response Ref:

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Name

Email

Response Type

On behalf of:

Choice **12 C**

Do you have a greenfield site you wish us to consider in the proposed Plan? - Greenfield file upload

Short Response

Explanation

Choice **12 D**

Do you have a brownfield site you wish us to consider in the proposed Plan? - Brownfield sites upload

Short Response

Explanation

Choice **13 A**

We want to create a new policy that provides support for social enterprises, start-ups, culture and tourism, innovation and learning, and the low carbon sector, where there is a contribution to good growth for Edinburgh. Do you agree with this? - Yes / No

Short Response

Explanation

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On behalf of:

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Choice 14 A

We want City Plan 2030 to support the best use of existing public transport infrastructure in West Edinburgh and accommodate the development of a mix of uses to support inclusive, sustainable growth. We will do this through ‘an area of search’ which allows a wide consideration of future uses within West Edinburgh without being tied to individual sites. Do you support this approach? - Yes / No

Short Response

Explanation

Choice 14 B

We want to remove the safeguard in the existing plan for the Royal Highland Showground site to the south of the A8 at Norton Park and allocate the site for other uses. Do you agree with this approach? - Yes / No

Short Response

Explanation

Choice 14 C

We want City Plan 2030 to allocate the Airport’s contingency runway, the “crosswinds runway” for the development of alternative uses next to the Edinburgh Gateway interchange. Do you agree with this approach? - Yes / No

Short Response

Explanation

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On behalf of:

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Choice 15 A

We want to continue to use the national 'town centre first' approach. City Plan 2030 will protect and enhance the city centre as the regional core of south east Scotland providing shopping, commercial leisure, and entertainment and tourism activities. Do you agree with this? - Yes / No

Short Response

Explanation

Choice 15 B

New shopping and leisure development will only be allowed within our town and local centres (including any new local centres) justified by the Commercial Needs study. Outwith local centres, small scale proposals will be permitted only in areas where there is evidence of a lack of food shopping within walking distance. Do you agree? - Yes / No

Short Response

Explanation

Choice 15 C

We want to review our existing town and local centres including the potential for new identified centres and boundary changes where they support walking and cycling access to local services in outer areas, consistent with the outcomes of the City Mobility Plan. Do you agree? - Yes / No

Short Response

Explanation

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Choice 15 D

We want to continue to prepare and update supplementary guidance for our town centres to adapt to changing retail patterns and trends, and ensure an appropriate balance of uses within our centres to maintain their vitality, viability and deliver good placemaking. Instead we could stop using supplementary guidance for town centres and set out guidance within the plan. Which approach do you support? - Yes / No

Short Response

Explanation

Choice 15 E

We want to support new hotel provision in local, town, commercial centres and other locations with good public transport access throughout Edinburgh. Do you agree with this approach? - Yes / No

Short Response

Explanation

Choice 15 G

We could also seek to reduce the quantity of retail floorspace within centres in favour of alternative uses such as increased leisure provision and permit commercial centres to accommodate any growing demand. Do you agree with this approach? - Yes / No

Short Response

Explanation

Customer Ref: Response Ref:

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Email

Response Type

On behalf of:

Choice **16 A1**

We want to continue to support office use at strategic office locations at Edinburgh Park/South Gyle, the International Business Gateway, Leith, the city centre, and in town and local centres. Do you agree? - Yes / No

Short Response

Explanation

Choice **16 A2**

We want to support office development at commercial centres as these also provide accessible locations. - Yes / No

Short Response

Explanation

Choice **16 A3**

We want to strengthen the requirement within the city centre to provide significant office floorspace within major mixed-use developments. Do you agree? - Yes / No

Short Response

Explanation

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On behalf of:

Supporting Info

Email

Choice **16 A4**

We want to amend the boundary of the Leith strategic office location to remove areas with residential development consent. Do you agree? - Yes / No

Short Response

Explanation

Choice **16 A5**

We want to continue to support office development in other accessible locations elsewhere in the urban area. Do you agree? - Yes / No

Short Response

Explanation

Choice **16 A5**

We want to continue to support office development in other accessible locations elsewhere in the urban area. Do you agree? - Do you have an office site you wish us to consider in the proposed Plan?

Short Response

Explanation

Customer Ref: Response Ref:

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Email

Response Type

On behalf of:

Choice **16 B**

We want to identify sites and locations within Edinburgh with potential for office development. Do you agree with this? - Yes/No

Short Response

Explanation

Choice **16 C**

We want to introduce a loss of office policy to retain accessible office accommodation. This would not permit the redevelopment of office buildings other than for office use, unless existing office space is provided as part of denser development. This would apply across the city to recognise that office locations outwith the city centre and strategic office locations are important in meeting the needs of the mid-market. Or we could Introduce a 'loss of office' policy only in the city centre. - Yes / No

Short Response

Explanation

Choice **16 E1**

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Support - Leith Strategic Business Centre

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 E2

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Support - Newbridge

Short Response

Explanation

Choice 16 E3

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Support - Newcraighall Industrial Estate.

Short Response

Explanation

Choice 16 E4

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Support - The Crosswinds Runway

Short Response

Explanation

Customer Ref: Response Ref:

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Response Type

On behalf of:

Supporting Info

Email

Choice 16 E5

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Do not support - Leith Strategic Business Centre

Short Response

Explanation

Choice 16 E6

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Do not support - Newbridge

Short Response

Explanation

Choice 16 E7

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Do not support - Newcraighall Industrial Estate.

Short Response

Explanation

Customer Ref: Response Ref:
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Response Type
On behalf of:

Supporting Info

Email

Choice 16 E8

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Do not support - The Crosswinds Runway

Short Response

Explanation

Choice 16 EX

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Explain why

Short Response

Explanation

Choice 16 F

We want to ensure new business space is provided as part of the redevelopment of urban sites and considered in Place Briefs for greenfield sites. We want to set out the amount expected to be re-provided, clearer criteria on what constitutes flexible business space, and how to deliver it, including the location on-site, and considering adjacent uses, servicing and visibility. Do you agree? - Yes / No

Short Response

Explanation

Customer Ref: Response Ref:

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On behalf of:

Supporting Info

Email

Choice **16 G**

We want to continue to protect industrial estates that are designated under our current policy on Employment Sites and Premises (Emp 8). Do you agree? - Yes / No

Short Response

Explanation

Choice **16 H**

We want to introduce a policy that provides criteria for locations that we would support city-wide and neighbourhood goods distribution hubs. Do you agree? - Yes / No

Short Response

Explanation



Edinburgh City Plan Representation

Choices Consultation April 2020

Representation

On Behalf of: Hillend Leisure Ltd

Site: Land at Lothianburn, North of Hillend Road, Subject to Proposals for the Pentland Trail Centre

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Appendices

Appendix I Avison Young Pentland Hills Regional Park – Representations, January 2020

Prepared By: Oliver Munden

Status: Draft

Draft Date: 8 April 2020

For and on behalf of Avison Young (UK) Limited

1. Introduction

- 1.1 This representation is made on behalf of Hillend Leisure Limited ("HLL"), the business promoting the proposal to develop a mountain bike and walkers' trail centre, with other outdoor leisure facilities on the north-eastern slopes of the Pentland Hills at Lothianburn, north of Hillend Road. Swanston Farm Limited is the land owning farm and is the main business behind the Hillend Leisure Ltd Pentland Trail Centre proposals.
- 1.2 The proposals are the subject of an on-going pre-application consultation (City of Edinburgh Reference: 19/00764/PAN) and HLL has a web page which details the proposals. See: <https://swanston.co.uk/pentland-trail-centre/>
- 1.3 Figures 1, 2 and 3 below detail the site and proposals, with figure 4 providing some context to the surrounding area.

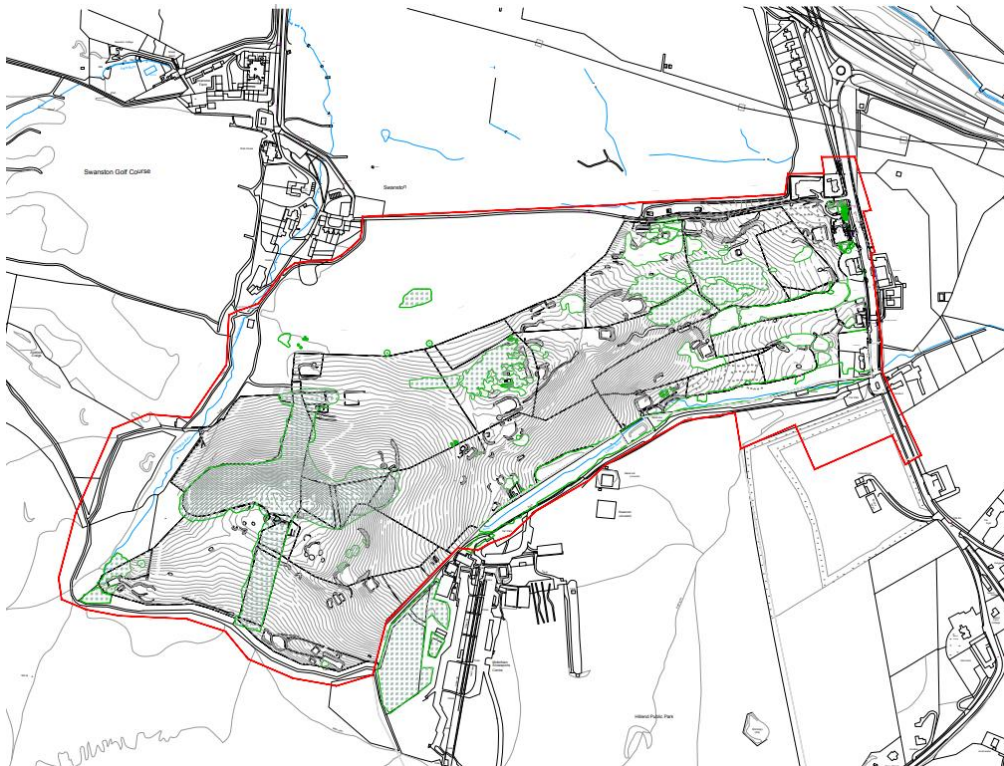


Figure 1: Site Location Plan



Figure 2: Indicative Trail Map and Trail Head Development Zone (see link above to the Pentland Trail Centre Consultation Website).



Figure 3: Image of Trail Head Hub



Figure 4: Plan showing surrounding context of approved and emerging proposals for leisure based activities

2. Summary of Representations

- 2.1 Hillend Leisure Limited wishes to request that the City of Edinburgh Council recognises this leisure development opportunity in the Proposed City Plan and associated proposals map for this area, with a symbol to note the opportunity for a trail centre and a linked trail-head commercial/ leisure hub. It is also requested that the green belt policy is amended in the Proposed Plan, to include more detail on types of built /indoors facilities for recreational, leisure and wellbeing development, which can complement the outdoor recreational role of green belt. This relates directly to Choice 1 of 'Choices'
- 2.2 This case is made simultaneously with the representations already lodged in response to the recent consultation on the Pentland Hills Regional Park management Plan. See **Appendix 1** for a copy.
- 2.3 Our summary case is to specifically request that:
- The Proposals Map gives a designation similar to the adjoining Midlothian LDP symbol / proposal, which acknowledges a significant site proposal at Hillend and reflects this with the same for the proposed Pentland Trail Centre (PTC) trail head hub area to the immediate west to the Steading Inn. See Figure 5.
 - To promote a policy in the City Plan to encourage increased levels of woodland planting and woodland renewal in locations close to the city-fringe.
 - Also to acknowledge in the Proposed City Plan that a site masterplan for the built and recreational trail facilities at the Pentland Trail Centre can be part of a planning application and consultation-led masterplan.
 - Further, the PTC case is to request that the detail of the criteria allowances in the "ENV10" green belt policy be broadened and clarified to make a much stronger reference to appropriate built developments in the green belt. It is suggested that this should fully support viable recreational and outdoor activities, with supporting indoor built facilities, subject to appropriate design and environmental guidelines, as per Figure 6. We note that ENV 10 is not a policy which is proposed to be reviewed through the City Plan, however we would encourage CEC to do so as per the above and the contents of this representation.



Figure 5: A request to Request to designate the Pentland Trail Centre site on a future proposals map – for appropriate built development within the green belt.

Edinburgh Local Development Plan

Natural Environment

180 Policies Env 10 to Env 16 will play an important role in ensuring development proposals protect and where possible enhance Edinburgh's natural heritage. Further advice can be found in Council guidance.

Policy Env 10 Development in the Green Belt and Countryside

Within the Green Belt and Countryside shown on the Proposals Map, 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:

- a) For the purposes of agriculture, woodland and forestry, horticulture or countryside recreation, where a countryside location is essential and provided any buildings, structures or hard standing areas are of a scale and quality of design appropriate to the use.

Figure 6: A request for a revision to green belt policy, to amplify the importance of human health and well-being within the allowance for countryside recreation development in the green belt. Within the limits and safeguards on environment and design quality, make an allowance for appropriate built development to support viable countryside recreation proposals in successor ENV10 policy. In addition, policies and proposals to promote new woodland and the Million Tree City along the fringes of the urban area of the city (Choice 1)

3. Sustainable City Which Supports Everyone's Physical and Mental Well-Being

3.1 Here, we respond to:

- **Choice 1: Making Edinburgh sustainable, active and connected city.**
- **Choice 2: Improving their quality, density and accessibility of development.**
- **Choice 3: Delivering carbon neutral buildings.**

3.2 The primary objective of the planning authority in the Choices consultation for the new City Plan is for a resilient city which is sustainable and healthy, supporting everyone's physical and mental well-being through the creation of a network of green spaces which protects the green setting and promotes sustainable travel choices.

3.3 Hillend Leisure Ltd (HLL) makes this representation in the context of a sustainable, accessible and high quality outdoor recreational development on the edge of the Pentland Hills, for all citizens of Edinburgh and the wider catchment area to enjoy.

3.4 In response to the Choices consultation, this is a request for a clear identification/notation to be given in the new Proposed City Plan for an appropriate scale and kind of development set to the immediate west of Lothianburn (Steading Inn) and on the lower slopes of the Pentland Hills. Combined with the future success of the snow sports centre at Hillend in Midlothian, HLL believes that a highly successful complex and outdoor facilities can be achieved this location on the edge of the city and at the edge of the Pentland Hills.

3.5 As noted in our representations on the recent Pentland Hills Regional Park consultation, this will help further to promote the Pentland Hills as a beautiful multi-use green space and with a particular focus on the future health and well-being of the population of Edinburgh, Midlothian and further afield. The Pentland Trail Centre (PTC) is focused on walking, cycling and sport, with an opportunity to address other environmental factors such as climate change, biodiversity and air quality. There could be opportunities at the site to creatively manage the water environment and future opportunities for food growing could be included at the site.

3.6 Specifically, we note the importance of the 2012 Edinburgh and Lothians Forestry and Woodlands Strategy approved by the City Planning Committee and the City Council's approval (Culture and Communities Committee 28 January 2020) to promote Edinburgh as a "Million Tree City" by 2030 through on-going management of established woodland and new initiatives to establish woodland in suitable locations that are close to the city. The above 2020 Committee resolution noted the City Plan Choices review and stated that the new LDP is a positive opportunity to develop new policies and proposals for increasing the tree stock (para 3.2). The partners in the Pentland Trail Centre wish to actively engage in the Million Tree City initiative and intend to support the Million Tree Forum.

3.7 A starting point will be the future management and phased re-planting of the "T-wood" on the higher slopes of the proposed Pentland Trail Centre, located north of Caerketton Hill and immediately west of the ski

centre. Dating from the Trotter family making the first plantation here in 1766, this wood has been subject to recent tree surveys. The surveys confirmed that, due to the advanced age of the trees and the root zones becoming stressed due to the shallow soil cover, advanced age, height and size of the fully matured canopies, there is now a need to replenish the woodland on a phased basis.

- 3.8 The recent tree surveys have been supported by the Edinburgh and Lothians Greenspace Trust, which is based at Swanston Farm.
- 3.9 In respect to the green corridor aspirations, active/ connected city and carbon neutral objectives it is particularly relevant in this case to highlight the main business behind the Hillend Leisure Ltd Pentland Trail Centre proposals – Swanston Farm Limited (<https://swanston.co.uk/>).
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 - An opportunity to link this significant hillside green space with the other "extra-large greenspaces" in south Edinburgh.
 - The possibility of food growing at the site and other attractions for visitors to Edinburgh and event space.
 - An intention to undertake long-term maintenance and management on the site.
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4.5 Our client is also currently securing detailed planning permission adjacent to this park and ride facility, for a new hotel. As part of that development, a new signalised crossing is required, offering further connectivity benefits between the city and the proposed Pentland Trail Centre.

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Figure 7: Extract from Choices Map 5, with our red routes indicated for potential cycle route connections.

- 4.8 HLL is keen to pursue further detailed dialogue with the planning authority on the exact routing of a Pentland to Portobello Link. The PTC proposal can make provision to link eastwards to this route if required. The proposed new signalised junction (see Fig 8 and that required for the new hotel adjacent to the proposed location for the Park and Ride facility) would be able to provide for new safe crossing of the A702.
- 4.9 Furthermore, recognising the growing significance of active travel modes, the PTC proposal envisages further non-car-based links to the south suburbs of Edinburgh and beyond. **It is suggested that the proposed city plan highlights more links to the Pentland Hills** and the PTC development can make provision for future cycle routes to and through the site and augment this with on-site changing, meeting space, cycle repair, equipment hire, sales and public information.
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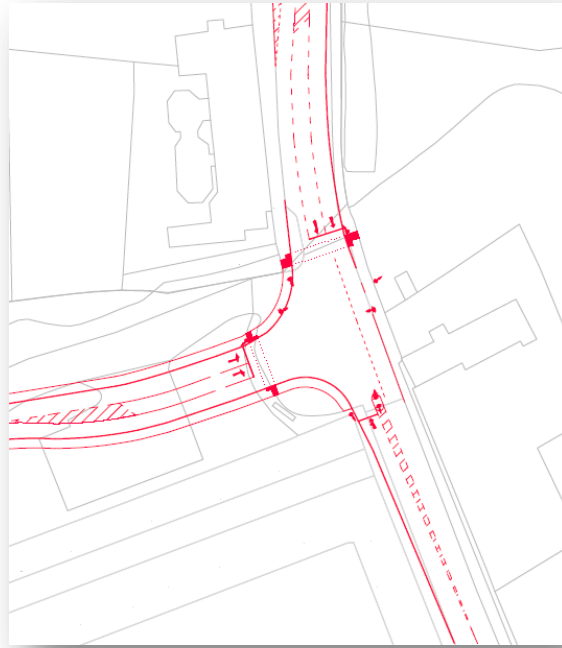


Figure 8: Systra's proposed signalised junction. Currently under consideration by Transport Scotland. Hillend Road to A702 Biggar Road. To serve PTC, Hillend Snowsports and the proposed Calderstone Hotel.

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5.1 Here, we respond to:

- **Choice 13: supporting inclusive growth, innovation, universities and culture.**

5.2 The fourth key objective of the Choices consultation is to promote a city where everyone shares an economic success. HLL wish to put forward the PTC development as a significant recreational facility which can assist in supporting inclusive growth, innovation, tourism and culture.

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5.4 **Finally, under the general objective of economic success, HLL wishes to highlight with the planning authority, the urgency for economic stimulus in 2020 as a result of the recent virus outbreak.**

5.5 As an investor/developer with an interest in committing resources and investment in a centre for recreation, sport, health and well-being, HLL wishes to work with the local authority under its planning and economic responsibilities, to promote this development.

5.6 HLL can also assist in efforts to extend the reach of the authority's planning function to other national and city-wide initiatives which could help to stimulate the economy and, most importantly integrate with new strategies on health and well-being in the future. In the scoping for Environmental Impact Assessment for this site, HLL intends to include a significant input on the impacts for human health and wellbeing.

Appendix I

Avison Young Pentland Hills
Regional Park – Representations,
January 2020

Response ID ANON-X3XM-WUJH-E

Submitted to **Pentland Hills Regional Park Strategic Plan 2019-2028**

Submitted on **2020-01-31 11:51:25**

Your comments

Please use the space below for any comments, concerns or questions relating to the draft PHRP Strategic Plan.

Comments, concerns or questions:

We are appointed by Hillend Leisure Limited (HLL) to make a consultation submission in response to the proposed Pentland Hills Regional Park Strategic Management Plan. This submission relates specifically to the proposed Pentland Trail Centre (PTC) at the former Lothianburn Golf Course. Whilst the PTC proposals are still in early stages, they relate to the redevelopment of the former golf course as a mountain bike trail centre with a central hub building providing educational facilities, mountain bike hire for use within the PTC, changing facilities for cyclists and significantly improved access to the wider PHRP. This facility would sit alongside the other various rural and recreational business activities currently operated by our client principal, Mr A McClung of Swanston Farm Limited, based at Swanston. Mr McClung is the lead director in the Hillend Leisure Limited business.

We have reviewed the Strategic Management Plan, primarily in the land-use planning context and our comments are as follows:

1. Swanston Farm Ltd. has been a PHRP Forum liaison member for a number of years and has actively participated in the previous Park Management Plan and maintains a continuing dialogue with Rangers and other officers of the appointed local authority – City of Edinburgh Council.
2. HLL has engaged with the PHRP Forum and Joint Committee (February 2019 and November 2019) on the specifics of the Pentland Trail Centre proposals. Pre-application consultation is on-going for the PTC scheme including consultation with the Friends of the Pentlands, local community councils and the public. The current focus for the project relates to the signalisation of the existing A702/Hillend truck road, which is acceptable to the national roads agency – Transport Scotland. The PTC planning and design team is also engaged in pre-application discussions with the local authorities on development content, planning policy, landscape masterplan, environmental impact and on-site trail building/maintenance and site management, prior to the submission of a formal application.
3. HLL wishes to record a general welcome to the updated Management Plan and the general aims which are to retain the essential character of the hills for peaceful enjoyment of the countryside; protecting and enhancing the landscape and habitat; encouraging responsible public enjoyment and allowing these aims to co-exist with farming and other land uses in the Park. It is noted that the Regional Park acknowledges a living and changing environment evolving as a mixed land use resource and an important leisure, economic, community and heritage asset to the capital city and surroundings.
4. Figure 1.1 is fully supported as a mapping reference and the categorisation of the path-ways is helpful. However, HLL wishes to encourage a footnote to the map which acknowledges the emerging potential of further development of trail-ways for cycles, particularly through a controlled network of mountain biking (MTB) trails at Swanston.
5. Other icons and imagery in the Plan highlight the cycling activity, however the Plan does not specifically reference this activity as being supported within the Park. As a general comment HLL wishes to promote more prominence in the Plan for well-managed cycling trails and activities. In particular, this should cross-refer to the national campaign to promote the Development of Mountain Biking in Scotland, DMBiS (<http://www.dmbins.com/>).
6. The Plan has a summary at Section 2 on relevant planning policies. HLL recognises that the PTC scheme will need to address the likes of policies ENV 10 and ENV 11 of the Edinburgh City Local Development Plan (green belt / special landscape area) but it will also be crucial to link these policies to a continuing support for the evolving aims of the Park under the LDP policy ENV 17 for planning decisions to respect to the aims of the Pentland Hills Regional Park. Similar policies exist in the Midlothian LDP.
7. It is our submission that the PHRP Strategic Management Plan should make more emphasis in its aims for an increasing popularity of the hills and open spaces from city residents and other communities for cycling – particularly given the development of cycling in the capital city and in Scotland nationally. This would help support Theme A identified in Figure 1.2 on page 16.
8. Whilst there is a case to welcome the health and wellbeing benefits of cycling generally across the Pentlands, there is a concurrent need to shape this general welcome with some forms of controlled management. The directors of HLL are national mountain bike leaders / instructors and are working alongside Development of Mountain Biking in Scotland. Following direct experience in the Scottish Borders, Cairngorms and other focal locations (particularly the “7 Stanes” network), they believe that unrestricted “free-trailing” can be damaging to the likes of the Pentlands and managed sites can promote more responsible cycling activities in future. A managed site intensifies the mountain bike trail building and up/down hill courses in one focussed area and promotes an engaged cycling community which supports and respects the hillsides and with a propensity to help support sustainable trail building.
9. The Proposed Plan notes at page 9 and 10 that various current national strategies are relevant. It is suggested that this section should make reference to cycling in more clear terms and in particular the Development of Mountain Biking in Scotland initiative.
10. HLL supports the 4-element Vision at pages 12 and 13 of the Plan. The primacy of conservation, enhancement and partnering with private land managers to welcome visitors and local communities is a positive element along with a developed public understanding of the Park, responsible access for all and support for local communities living and working in the Park. However, HLL believes that the Plan’s vision could be more explicit about the range of actual activities which will be welcomed under a sensitively managed regime, including cycling. The same comment applies to the Themes and Principles A to E, at page 16, where cycling would fall within these themes, particularly A which relates to responsible enjoyment and understanding of the hills, and D, relating to public health and future PHRP stewardship.
11. The Pentland Trail Centre proposal at Lothianburn is an exciting new cycle and walking trail centre with other activities to complement the impressive mix of

snow sports and other facilities at Hillend, where separate proposals by Midlothian Council for the intensification of uses on their site are currently progressing through planning. While HLL recognises that the PTC proposal is at a pre-planning application stage, it is suggested that the Plan's Aims should be more specific about proposed and potential for a new trail and activity centre. As such, we would support additions to the end of Part 4 of the Plan, referring to the delivery of new physical development (including buildings) in the Park, such as the PTC.

12. In this regard the HLL team recognises the Monitoring proposals in Section 5, particularly the fourth bullet and would invite a more specific route to further liaison on cycling. HLL would welcome a future protocol in the Plan for relevant landowner/ developers of new activity sites to liaise with the PHRP Committee and Rangers to set out evolving Aims, to accord with emerging new activities and trails such as the combined cycle and hiking trails proposed in the PTC scheme at Lothianburn.

13. Turning to the various aims introduced from page 18 onwards, there is little included which relates to working with third parties, such as HLL, to assist in the delivery of the identified aims. This is particularly relevant for Theme A, aims 1 and 3; Theme B, aim 1; and, all of the aims of Theme D. HLL therefore requests the aims are amended to make reference to the third parties who could assist in the delivery of these aims, and the schemes that are proposed, such as the PTC.

14. Whilst it is noted that Theme D, aim 3 includes partnership working, HLL believe this could be further expanded to include not only sponsorship, but assisting in the delivery of new or improved facilities to help deliver the aims of the plan. This is particularly relevant to the PTC project given one of its key aims is to improve accessibility into the PHRP for cyclists, as well as the associated benefits (i.e. health and wellbeing) linked with it.

In summary, Hillend Leisure Limited support the contents of the plan, however request that specific reference is made under Theme A, to the plan undertaking to develop a more detailed management plan to support and encourage cycling across PHRP. Our client is keen to develop this with the forthcoming PTC and we would welcome a Plan which allows for sustainable and responsible new developments within the park. Should further detail be required on any of the above, we would be happy to meet with representatives from the PHRP to discuss further.

In light of our current pre-application planning proposals, a copy of this submission will also be issued to J Paton, J Waldron and J Dewar of CEC Planning.

About you

What is your name?

Name:

Oliver Munden

What is your email address?

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What is your organisation / business?

Organisation / business:

Avison Young OBO Hillend Leisure Ltd.

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Edinburgh City Plan Representation

Choices Consultation April 2020

Representation

On Behalf of: Hillend Leisure Ltd

**Site: Land at Lothianburn, North of Hillend Road, Subject to Proposals
for the Pentland Trail Centre**

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4.	Encouraging Non-Car-Based Travel	9
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Appendices

Appendix I Avison Young Pentland Hills Regional Park – Representations, January 2020

Prepared By: Oliver Munden

Status: Draft

Draft Date: 8 April 2020

For and on behalf of Avison Young (UK) Limited

1. Introduction

- 1.1 This representation is made on behalf of Hillend Leisure Limited ("HLL"), the business promoting the proposal to develop a mountain bike and walkers' trail centre, with other outdoor leisure facilities on the north-eastern slopes of the Pentland Hills at Lothianburn, north of Hillend Road. Swanston Farm Limited is the land owning farm and is the main business behind the Hillend Leisure Ltd Pentland Trail Centre proposals.
- 1.2 The proposals are the subject of an on-going pre-application consultation (City of Edinburgh Reference: 19/00764/PAN) and HLL has a web page which details the proposals. See: <https://swanston.co.uk/pentland-trail-centre/>
- 1.3 Figures 1, 2 and 3 below detail the site and proposals, with figure 4 providing some context to the surrounding area.

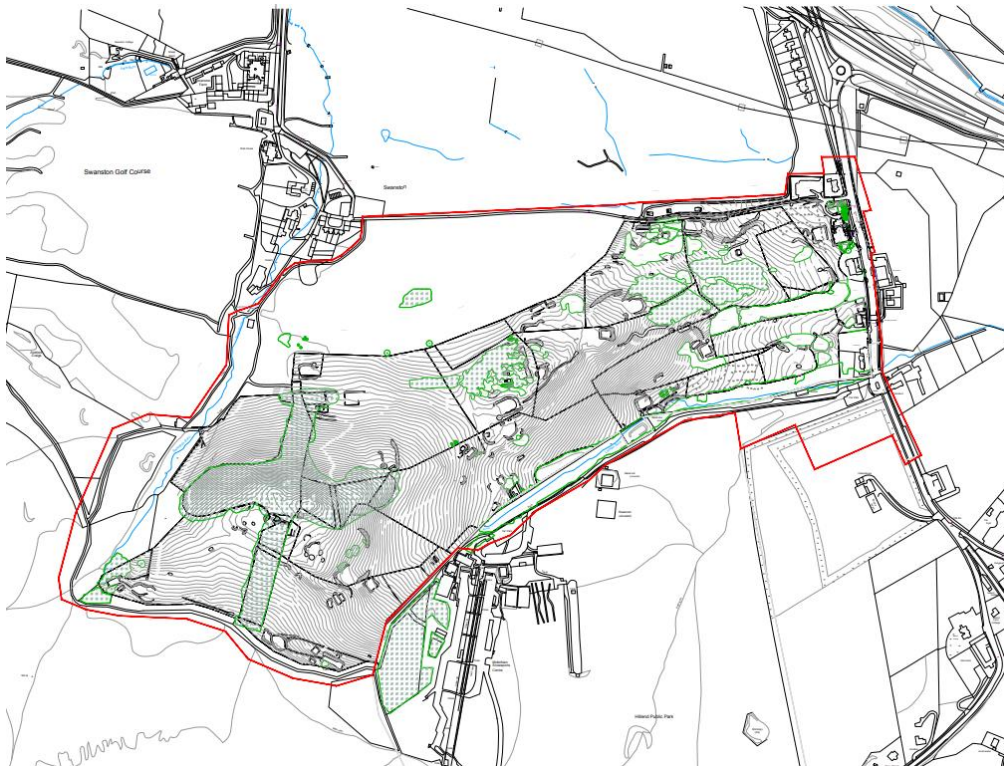


Figure 1: Site Location Plan



Figure 2: Indicative Trail Map and Trail Head Development Zone (see link above to the Pentland Trail Centre Consultation Website).



Figure 3: Image of Trail Head Hub



Figure 4: Plan showing surrounding context of approved and emerging proposals for leisure based activities

2. Summary of Representations

- 2.1 Hillend Leisure Limited wishes to request that the City of Edinburgh Council recognises this leisure development opportunity in the Proposed City Plan and associated proposals map for this area, with a symbol to note the opportunity for a trail centre and a linked trail-head commercial/ leisure hub. It is also requested that the green belt policy is amended in the Proposed Plan, to include more detail on types of built /indoors facilities for recreational, leisure and wellbeing development, which can complement the outdoor recreational role of green belt. This relates directly to Choice 1 of 'Choices'
- 2.2 This case is made simultaneously with the representations already lodged in response to the recent consultation on the Pentland Hills Regional Park management Plan. See **Appendix 1** for a copy.
- 2.3 Our summary case is to specifically request that:
- The Proposals Map gives a designation similar to the adjoining Midlothian LDP symbol / proposal, which acknowledges a significant site proposal at Hillend and reflects this with the same for the proposed Pentland Trail Centre (PTC) trail head hub area to the immediate west to the Steading Inn. See Figure 5.
 - To promote a policy in the City Plan to encourage increased levels of woodland planting and woodland renewal in locations close to the city-fringe.
 - Also to acknowledge in the Proposed City Plan that a site masterplan for the built and recreational trail facilities at the Pentland Trail Centre can be part of a planning application and consultation-led masterplan.
 - Further, the PTC case is to request that the detail of the criteria allowances in the "ENV10" green belt policy be broadened and clarified to make a much stronger reference to appropriate built developments in the green belt. It is suggested that this should fully support viable recreational and outdoor activities, with supporting indoor built facilities, subject to appropriate design and environmental guidelines, as per Figure 6. We note that ENV 10 is not a policy which is proposed to be reviewed through the City Plan, however we would encourage CEC to do so as per the above and the contents of this representation.



Figure 5: A request to Request to designate the Pentland Trail Centre site on a future proposals map – for appropriate built development within the green belt.

Edinburgh Local Development Plan

Natural Environment

180 Policies Env 10 to Env 16 will play an important role in ensuring development proposals protect and where possible enhance Edinburgh's natural heritage. Further advice can be found in Council guidance.

Policy Env 10 Development in the Green Belt and Countryside

Within the Green Belt and Countryside shown on the Proposals Map, 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:

- For the purposes of agriculture, woodland and forestry, horticulture or countryside recreation, where a countryside location is essential and provided any buildings, structures or hard standing areas are of a scale and quality of design appropriate to the use.

Figure 6: A request for a revision to green belt policy, to amplify the importance of human health and well-being within the allowance for countryside recreation development in the green belt. Within the limits and safeguards on environment and design quality, make an allowance for appropriate built development to support viable countryside recreation proposals in successor ENV10 policy. In addition, policies and proposals to promote new woodland and the Million Tree City along the fringes of the urban area of the city (Choice 1)

3. Sustainable City Which Supports Everyone's Physical and Mental Well-Being

3.1 Here, we respond to:

- **Choice 1: Making Edinburgh sustainable, active and connected city.**
- **Choice 2: Improving their quality, density and accessibility of development.**
- **Choice 3: Delivering carbon neutral buildings.**

3.2 The primary objective of the planning authority in the Choices consultation for the new City Plan is for a resilient city which is sustainable and healthy, supporting everyone's physical and mental well-being through the creation of a network of green spaces which protects the green setting and promotes sustainable travel choices.

3.3 Hillend Leisure Ltd (HLL) makes this representation in the context of a sustainable, accessible and high quality outdoor recreational development on the edge of the Pentland Hills, for all citizens of Edinburgh and the wider catchment area to enjoy.

3.4 In response to the Choices consultation, this is a request for a clear identification/notation to be given in the new Proposed City Plan for an appropriate scale and kind of development set to the immediate west of Lothianburn (Steading Inn) and on the lower slopes of the Pentland Hills. Combined with the future success of the snow sports centre at Hillend in Midlothian, HLL believes that a highly successful complex and outdoor facilities can be achieved this location on the edge of the city and at the edge of the Pentland Hills.

3.5 As noted in our representations on the recent Pentland Hills Regional Park consultation, this will help further to promote the Pentland Hills as a beautiful multi-use green space and with a particular focus on the future health and well-being of the population of Edinburgh, Midlothian and further afield. The Pentland Trail Centre (PTC) is focused on walking, cycling and sport, with an opportunity to address other environmental factors such as climate change, biodiversity and air quality. There could be opportunities at the site to creatively manage the water environment and future opportunities for food growing could be included at the site.

3.6 Specifically, we note the importance of the 2012 Edinburgh and Lothians Forestry and Woodlands Strategy approved by the City Planning Committee and the City Council's approval (Culture and Communities Committee 28 January 2020) to promote Edinburgh as a "Million Tree City" by 2030 through on-going management of established woodland and new initiatives to establish woodland in suitable locations that are close to the city. The above 2020 Committee resolution noted the City Plan Choices review and stated that the new LDP is a positive opportunity to develop new policies and proposals for increasing the tree stock (para 3.2). The partners in the Pentland Trail Centre wish to actively engage in the Million Tree City initiative and intend to support the Million Tree Forum.

3.7 A starting point will be the future management and phased re-planting of the "T-wood" on the higher slopes of the proposed Pentland Trail Centre, located north of Caerketton Hill and immediately west of the ski

centre. Dating from the Trotter family making the first plantation here in 1766, this wood has been subject to recent tree surveys. The surveys confirmed that, due to the advanced age of the trees and the root zones becoming stressed due to the shallow soil cover, advanced age, height and size of the fully matured canopies, there is now a need to replenish the woodland on a phased basis.

- 3.8 The recent tree surveys have been supported by the Edinburgh and Lothians Greenspace Trust, which is based at Swanston Farm.
- 3.9 In respect to the green corridor aspirations, active/ connected city and carbon neutral objectives it is particularly relevant in this case to highlight the main business behind the Hillend Leisure Ltd Pentland Trail Centre proposals – Swanston Farm Limited (<https://swanston.co.uk/>).
- 3.10 Swanston Farm is the lead business behind the Pentland Trail Centre project. The 700 acre working farm on the city edge is a long-established rural business with livery, pony riding, golf (including disc golf, foot golf), walking/hiking and cycling all managed alongside a working farm in the Pentland Hills Regional Park. Swanston Farm Ltd also manages successful self-catering, offices and a brasserie alongside the outdoor focus. This is critical to the core objective of these representations – to endorse the higher quality and enduring management of the outdoor landscape asset by co-locating carefully planned and professionally managed built facilities, together with the planting of significant areas of new woodland.
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- 4.8 HLL is keen to pursue further detailed dialogue with the planning authority on the exact routing of a Pentland to Portobello Link. The PTC proposal can make provision to link eastwards to this route if required. The proposed new signalised junction (see Fig 8 and that required for the new hotel adjacent to the proposed location for the Park and Ride facility) would be able to provide for new safe crossing of the A702.
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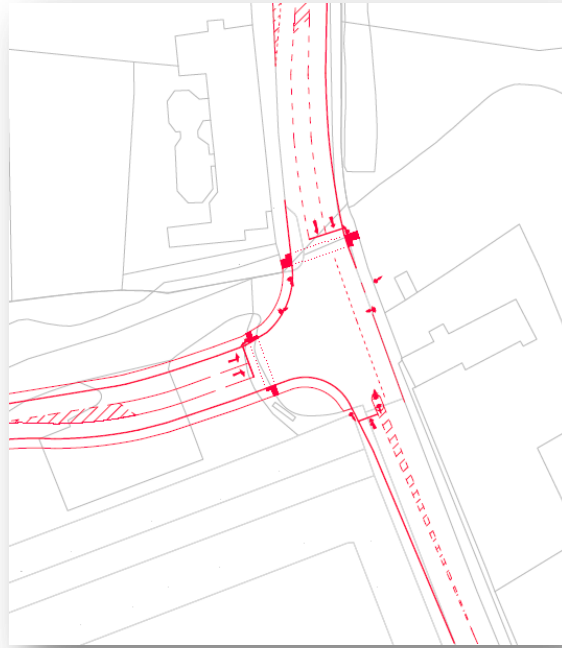


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5.3 Other major initiatives for innovation, employment and digital, research and development businesses are underway to the south of the city and the PTC facilities can integrate well with emerging future developments under the City Region Deal, particularly at the University's Bush Estate innovation centre to the south. HLL would be pleased to develop spaces within the hub complex at PTC to complement nearby businesses with a recreational and meeting facilities.

5.4 **Finally, under the general objective of economic success, HLL wishes to highlight with the planning authority, the urgency for economic stimulus in 2020 as a result of the recent virus outbreak.**

5.5 As an investor/developer with an interest in committing resources and investment in a centre for recreation, sport, health and well-being, HLL wishes to work with the local authority under its planning and economic responsibilities, to promote this development.

5.6 HLL can also assist in efforts to extend the reach of the authority's planning function to other national and city-wide initiatives which could help to stimulate the economy and, most importantly integrate with new strategies on health and well-being in the future. In the scoping for Environmental Impact Assessment for this site, HLL intends to include a significant input on the impacts for human health and wellbeing.

Appendix I

Avison Young Pentland Hills
Regional Park – Representations,
January 2020

Response ID ANON-X3XM-WUJH-E

Submitted to **Pentland Hills Regional Park Strategic Plan 2019-2028**

Submitted on **2020-01-31 11:51:25**

Your comments

Please use the space below for any comments, concerns or questions relating to the draft PHRP Strategic Plan.

Comments, concerns or questions:

We are appointed by Hillend Leisure Limited (HLL) to make a consultation submission in response to the proposed Pentland Hills Regional Park Strategic Management Plan. This submission relates specifically to the proposed Pentland Trail Centre (PTC) at the former Lothianburn Golf Course. Whilst the PTC proposals are still in early stages, they relate to the redevelopment of the former golf course as a mountain bike trail centre with a central hub building providing educational facilities, mountain bike hire for use within the PTC, changing facilities for cyclists and significantly improved access to the wider PHRP. This facility would sit alongside the other various rural and recreational business activities currently operated by our client principal, Mr A McClung of Swanston Farm Limited, based at Swanston. Mr McClung is the lead director in the Hillend Leisure Limited business.

We have reviewed the Strategic Management Plan, primarily in the land-use planning context and our comments are as follows:

1. Swanston Farm Ltd. has been a PHRP Forum liaison member for a number of years and has actively participated in the previous Park Management Plan and maintains a continuing dialogue with Rangers and other officers of the appointed local authority – City of Edinburgh Council.
2. HLL has engaged with the PHRP Forum and Joint Committee (February 2019 and November 2019) on the specifics of the Pentland Trail Centre proposals. Pre-application consultation is on-going for the PTC scheme including consultation with the Friends of the Pentlands, local community councils and the public. The current focus for the project relates to the signalisation of the existing A702/Hillend truck road, which is acceptable to the national roads agency – Transport Scotland. The PTC planning and design team is also engaged in pre-application discussions with the local authorities on development content, planning policy, landscape masterplan, environmental impact and on-site trail building/maintenance and site management, prior to the submission of a formal application.
3. HLL wishes to record a general welcome to the updated Management Plan and the general aims which are to retain the essential character of the hills for peaceful enjoyment of the countryside; protecting and enhancing the landscape and habitat; encouraging responsible public enjoyment and allowing these aims to co-exist with farming and other land uses in the Park. It is noted that the Regional Park acknowledges a living and changing environment evolving as a mixed land use resource and an important leisure, economic, community and heritage asset to the capital city and surroundings.
4. Figure 1.1 is fully supported as a mapping reference and the categorisation of the path-ways is helpful. However, HLL wishes to encourage a footnote to the map which acknowledges the emerging potential of further development of trail-ways for cycles, particularly through a controlled network of mountain biking (MTB) trails at Swanston.
5. Other icons and imagery in the Plan highlight the cycling activity, however the Plan does not specifically reference this activity as being supported within the Park. As a general comment HLL wishes to promote more prominence in the Plan for well-managed cycling trails and activities. In particular, this should cross-refer to the national campaign to promote the Development of Mountain Biking in Scotland, DMBiS (<http://www.dmbins.com/>).
6. The Plan has a summary at Section 2 on relevant planning policies. HLL recognises that the PTC scheme will need to address the likes of policies ENV 10 and ENV 11 of the Edinburgh City Local Development Plan (green belt / special landscape area) but it will also be crucial to link these policies to a continuing support for the evolving aims of the Park under the LDP policy ENV 17 for planning decisions to respect to the aims of the Pentland Hills Regional Park. Similar policies exist in the Midlothian LDP.
7. It is our submission that the PHRP Strategic Management Plan should make more emphasis in its aims for an increasing popularity of the hills and open spaces from city residents and other communities for cycling – particularly given the development of cycling in the capital city and in Scotland nationally. This would help support Theme A identified in Figure 1.2 on page 16.
8. Whilst there is a case to welcome the health and wellbeing benefits of cycling generally across the Pentlands, there is a concurrent need to shape this general welcome with some forms of controlled management. The directors of HLL are national mountain bike leaders / instructors and are working alongside Development of Mountain Biking in Scotland. Following direct experience in the Scottish Borders, Cairngorms and other focal locations (particularly the “7 Stanes” network), they believe that unrestricted “free-trailing” can be damaging to the likes of the Pentlands and managed sites can promote more responsible cycling activities in future. A managed site intensifies the mountain bike trail building and up/down hill courses in one focussed area and promotes an engaged cycling community which supports and respects the hillsides and with a propensity to help support sustainable trail building.
9. The Proposed Plan notes at page 9 and 10 that various current national strategies are relevant. It is suggested that this section should make reference to cycling in more clear terms and in particular the Development of Mountain Biking in Scotland initiative.
10. HLL supports the 4-element Vision at pages 12 and 13 of the Plan. The primacy of conservation, enhancement and partnering with private land managers to welcome visitors and local communities is a positive element along with a developed public understanding of the Park, responsible access for all and support for local communities living and working in the Park. However, HLL believes that the Plan’s vision could be more explicit about the range of actual activities which will be welcomed under a sensitively managed regime, including cycling. The same comment applies to the Themes and Principles A to E, at page 16, where cycling would fall within these themes, particularly A which relates to responsible enjoyment and understanding of the hills, and D, relating to public health and future PHRP stewardship.
11. The Pentland Trail Centre proposal at Lothianburn is an exciting new cycle and walking trail centre with other activities to complement the impressive mix of

snow sports and other facilities at Hillend, where separate proposals by Midlothian Council for the intensification of uses on their site are currently progressing through planning. While HLL recognises that the PTC proposal is at a pre-planning application stage, it is suggested that the Plan's Aims should be more specific about proposed and potential for a new trail and activity centre. As such, we would support additions to the end of Part 4 of the Plan, referring to the delivery of new physical development (including buildings) in the Park, such as the PTC.

12. In this regard the HLL team recognises the Monitoring proposals in Section 5, particularly the fourth bullet and would invite a more specific route to further liaison on cycling. HLL would welcome a future protocol in the Plan for relevant landowner/ developers of new activity sites to liaise with the PHRP Committee and Rangers to set out evolving Aims, to accord with emerging new activities and trails such as the combined cycle and hiking trails proposed in the PTC scheme at Lothianburn.

13. Turning to the various aims introduced from page 18 onwards, there is little included which relates to working with third parties, such as HLL, to assist in the delivery of the identified aims. This is particularly relevant for Theme A, aims 1 and 3; Theme B, aim 1; and, all of the aims of Theme D. HLL therefore requests the aims are amended to make reference to the third parties who could assist in the delivery of these aims, and the schemes that are proposed, such as the PTC.

14. Whilst it is noted that Theme D, aim 3 includes partnership working, HLL believe this could be further expanded to include not only sponsorship, but assisting in the delivery of new or improved facilities to help deliver the aims of the plan. This is particularly relevant to the PTC project given one of its key aims is to improve accessibility into the PHRP for cyclists, as well as the associated benefits (i.e. health and wellbeing) linked with it.

In summary, Hillend Leisure Limited support the contents of the plan, however request that specific reference is made under Theme A, to the plan undertaking to develop a more detailed management plan to support and encourage cycling across PHRP. Our client is keen to develop this with the forthcoming PTC and we would welcome a Plan which allows for sustainable and responsible new developments within the park. Should further detail be required on any of the above, we would be happy to meet with representatives from the PHRP to discuss further.

In light of our current pre-application planning proposals, a copy of this submission will also be issued to J Paton, J Waldron and J Dewar of CEC Planning.

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