

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

Explanation The principle of this approach is accepted generally. However, we would note that with respect Area 5 – Calderwood, the proposed greenfield land release, the site is not in close proximity to existing public greenspace provision. It is noted within the Green Network assessment of the area known as Bonnington (which Calderwood has been formed in part from) that “Most of the site may not be considered of value for the strategic green network, due to lying outwith identified green network opportunity areas and having no identified existing or potential use as part of the network.” But goes on to state that the site includes the Jupiter Artland sculpture park and designed landscape, “which is in active use as a cultural attraction and has value as a potential component of the green network. Any development should protect the setting and important view cones around the park.” (Housing Study, page 191)The importance of protecting Jupiter Artland’s setting is supported and we would reiterate the significant importance of this in protecting the view cones around the park to enable the facility to continue to operate successfully. However, we would also wish to clarify that Jupiter Artland is a charitable commercial operation and while the Park has an important role in the local cultural landscape, its presence should not be used as justification for the allocation of housing, given the site is in private ownership. Its function is distinct from residential use and would be undermined by a housing land allocation alongside it. It is not appropriate for Jupiter to be used as amenity parkland for a new greenfield housing development. In addition, the provision of public open spaces on land adjacent the park would undermine the capability of the park to operate successfully in terms of control of access or the ability to attract high profile artists if the unique setting of the park is altered. If the visitor experience is compromised this will reduce visitor footfall. The allocation of housing within the view cones from the estate would undermine the setting, impacting upon the ability of the park to attract internationally renowned artists and visitors. The creation of open space adjacent to the boundaries will bring about uncontrolled access, which will impact on the ability of the park to operate commercially and introduce unacceptable risk to art installations. Conversely the planting of boundaries to hem in Jupiter Artland would interrupt the open views that contribute to the Garden and Design Landscape and the setting of the park which is so crucial to the ability to attract interest from the international art world, and which have been identified in the Council’s own background studies. For these reasons, we would question the justification for allocating housing in areas where there is not already green network capacity or connections available, meaning that new sites would not be capable of meeting this policy requirement.

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

Supporting Info
Email

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

Explanation

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

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

Supporting Info
Email

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

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

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

Supporting Info
Email

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

The importance of directing new development (whether within the urban area or on greenfield land) to locations that have existing infrastructure capacity, including education, healthcare and sustainable transport is fundamental. However, it is noted that some of the sites which have been identified as potential for greenfield land release within the Choices for City Plan document do not meet these requirements and it is unclear how they could do so within the plan period. Specifically relating to Calderwood, this site has been formed from the sites referred to as Bonnington and Overshiel from the Sector 5 Site Assessment as shown on Page 217 of the Housing Study document. Both sites have been assessed within the Housing Study as being ‘potentially suitable for development’, despite numerous areas where they do not meet the criteria required, e.g. not within SESplan Strategic Development Area (SDA); no primary or secondary school capacity; poor accessibility; and impacts to the landscape. With respect Bonnington, the site is not within an SDA, has no public transport links, does not benefit from active travel routes, has no capacity in terms of community infrastructure (schools) and due to landscape impacts has no capacity for development. More specifically with respect schools, in light of the above policy, the Sector Assessment notes that “The site does not have sufficient community infrastructure capacity to support development and no appropriate existing intervention has been identified to address this. A new primary school would be required. A new secondary school would be required. The Council’s preference is to deliver new secondary schools with a capacity for 1200 pupils. If a new 1200 secondary school was delivered it could support a significant amount of additional housing development, but it would have to serve a wide catchment area so good active travel and transport links would be important. Capacity could be partially addressed through provision of schools included as part of the Calderwood development in West Lothian, subject to discussion with this authority.” Regardless of the approach, either through new schools within Edinburgh or across the boundary into West Lothian, there is significant uncertainty as to the ability to deliver this site in the plan period. The active travel and transport links are also not satisfactory to support a school of the capacity required, with no clear plan as to how it would be delivered.

With respect Overshiel, the assessment concludes that the site is not within an SDA, has no active travel links, with the exception of pedestrian routes to local convenience stores, no public transport links, and no community infrastructure capacity. It is noted the site is within the West Lothian school’s catchment which may result in additional concerns as to available capacity, as it is not clear how the schools requirement could be delivered through City Plan 2030.

The purpose of this emerging policy is to ‘Direct development to where there is existing infrastructure capacity’. Considering the above, it has not been demonstrated that the required capacity is currently available, nor has it been demonstrated that it could be delivered through the plan period. All of the background studies which have been prepared as part of the preparation for Choices for City Plan have demonstrated that there is insufficient existing capacity, in terms of education and transport infrastructure in relation to the Calderwood site. Site’s which cannot reasonably meet the required infrastructure needed for development to function should be removed from consideration and a focus made on sites which are better connected, within

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

SDA's, have existing education capacity and are more sustainable in terms of access to green and blue infrastructure which in turn limits the impact on the surrounding area.

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

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

Supporting Info
Email

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

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

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

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

Supporting Info
Email

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

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

Supporting Info
Email

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Customer Ref: 00418 Response Ref: ANON-KU2U-GFW6-1
Name: Deirdre Thom
Response Type: Agent / Consultant
On behalf of: Jupiter Artland

Supporting Info: Yes
Email: deirdre.thom@eu.jll.com

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: Not Answered

Explanation: Not Answered

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

Customer Ref: 00418 Response Ref: ANON-KU2U-GFW6-1
Name: Deirdre Thom
Response Type: Agent / Consultant
On behalf of: Jupiter Artland

Supporting Info: Yes
Email: deirdre.thom@eu.jll.com

Choice 12 A

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

Short Response: Option 1 (Council/

Explanation Option 1. Followed by Option 3 only if required. Jupiter Artland recognises the need for new housing sites to be identified to meet Edinburgh’s housing land requirements. It is considered that these should be delivered within the Urban Area where possible. However, it is recognised that this approach may not deliver all of the housing that Edinburgh needs. As such, we would suggest the fall back is a blended approach which includes some greenfield land release to meet the targets needed. If greenfield land release is required, the preference would be to focus on the most sustainable sites, in closer proximity to existing public transport corridors/infrastructure and with access to more sustainable transport modes and employment centres. For example, those within the SDA are considered to be most suitable and are more appropriate in terms of the existing (and proposed) policy context, which has identified these locations for strategic development as part of the existing spatial strategy. In many cases these locations are capable of meeting the requirements of other council policy principles such as access to green and blue infrastructure, proximity to employment centres, and existing or deliverable community infrastructure. Sites outwith SDA’s will need far greater interventions in the form of community and transport infrastructure to ensure they are deliverable within the Plan period.

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

Customer Ref: Response Ref:
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

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

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: 00418 Response Ref: ANON-KU2U-GFW6-1
Name: Deirdre Thom
Response Type: Agent / Consultant
On behalf of: Jupiter Artland

Supporting Info: Yes
Email: deirdre.thom@eu.jll.com

Choice 12 BX

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

Short Response: Not Answered

Explanation

Jupiter Artland objects to the greenfield site identified as Calderwood. This is due to the potential impacts on the functioning of Jupiter Artland and the impact it would have on its future success. Development which encroaches on the boundaries of the park will have a significant impact on the landscape setting of Jupiter Artland and its designed landscape, with particular focus on the extent of the proposed allocation which extends eastwards and lies to the north of the Jupiter boundary. The landscape setting is a critical factor for many of the artists and sculptors that come to Jupiter, many utilising the backdrop its landscape offers as part of their installations. Development that encroaches on the site, has the potential to impact on committed art installations or attractions if the landscape setting is altered. The background studies which have informed Choices for City Plan have identified a number of constraints to the development of Calderwood which should not be disregarded, and which require further consideration by CEC prior to the site being taken forward to the Proposed Local Development Plan. These relate to landscape impacts, which are of most significance for Jupiter Artland's setting and function; transport; and community infrastructure.

1. Impacts on Landscape Character

The proximity to a Garden and Designed Landscape is a significant concern in terms of the allocation of Calderwood and in particular the importance of the designed landscape and its essential setting to the successful future operations of Jupiter Artland. One of the background studies includes an Environmental Report (ER) which has considered the potential environmental effects of potential new development sites to inform the preferred approach and reasonable alternatives to be identified in the MIR. The Environmental Report's Non-Technical Summary notes that some of the 'reasonable alternative' Choices, which Calderwood is identified, are expected to have significant negative environmental effects, specifically Choice 12: Building our new homes and infrastructure. The findings note that the development of greenfield sites is expected to have more significant impacts than brownfield sites. Appendix 3 to the Environmental Report provides a Cumulative Assessment of the sites considered, within Edinburgh and in terms of adjacency to other councils. With respect Calderwood the cumulative assessment states "The site ... would have a modest (cross boundary) visual and landscape cumulative impact when combined with the existing Calderwood development. Its location adjacent to Jupiter Artland makes it sensitive in terms of landscape and visual impacts could be mitigated as addressed in the Greenfield site assessment (appendix 5 of ER)." The potential allocation around Calderwood could not be satisfactorily mitigated without impacting on the important view cones out of the site and thus the function of Jupiter Artland, for the reasons as set out within this representation. This is of most significance in relation to the part of the proposed allocation which extends eastwards and lies to the north of the boundary of the Garden and Designed Landscape as it would impact the view cones out from the site. Appendix 5: Greenfield Site Assessment to the Environmental Report sets out the assessment of sites from an environmental perspective and identifies the constraints to development and the necessary mitigation, referred to above, to minimise / contain impacts. Of note the assessment of Bonnington (West) states with respect mitigation that "The design of the development should be justified and seek to fully understand and preserve and/or enhance the character and appearance of the listed building/structures including their setting". It goes on to state that, "Masterplanning should mitigate impact on the views and setting of the Jupiter Artland sculpture park and designed landscape by allowing open viewlines from key areas of the park across the surrounding sites." (City Plan Environmental Report, page 192) The importance of the landscape is further demonstrated through CEC's Survey of the

Customer Ref: 00418 Response Ref: ANON-KU2U-GFW6-1

Supporting Info Yes

Name Deirdre Thom

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Response Type Agent / Consultant

On behalf of: Jupiter Artland

Bonnington Garden and Designed Landscape, which identifies an ‘essential setting’ outwith the designation boundary. The Site Plan, which is presented at Appendix 1 to this response, also identifies panoramic views out from the site. The allocation at Calderwood will impact directly onto those views. Jupiter Artland wishes to stress the importance of protecting that ‘essential setting’, the panoramic views and the unique cultural attraction which it offers. The allocation of housing land will impact significantly on Jupiter Artland’s operation, due to impacts on the important views out from the Park and also in terms of the surrounding landscape which is of huge importance to the setting and which is one of the main attractions for artists exhibiting their works at the site.

The proposals for Calderwood, that we have seen to date, significantly undermine this objective of protecting the essential setting and view cones out from the site, due to the proximity of placing amenity land/screening adjacent the immediate boundary of the Jupiter Artland site. The provision of amenity land in-between the potential allocation and the Jupiter Artland site undermine its function and setting. Similarly, with respect Overshiel, it states that “Appropriate open space should be provided within the development to meet open space standards. The design of the development should be justified and seek to fully understand and preserve and/or enhance the character and appearance of the listed building/structures including their setting.” (City Plan Environmental Report, page 193) We would reiterate the importance of offsetting and views to Jupiter Artland. Maintaining the important views which are afforded from the site are vital to its success and function. The information presented to date does not go far enough to mitigate the impacts to Jupiter.

Further analysis of potential greenfield sites has been done as part of a Landscape and Visual Impact Assessment background paper and the previously mentioned Environmental Report, which have concluded that in terms of the landscape impacts, Overshiel and Bonnington (which Calderwood has been formed from) have no capacity for development (Emphasis added). It states that Bonnington was excluded from the field assessment, due to the presence of constraints, including inclusion in the Special Landscape Area, a designed landscape and its setting. Relating to Overshiel, the assessment concludes no capacity for development due to its openness, and physical and perceptual isolation from existing settlements. These assessments appear to have been disregarded in the identification of Calderwood as a ‘reasonable alternative’ for delivering the necessary housing land within Edinburgh. It is considered that a housing land allocation would directly contravene the findings of the capacity study and the firm conclusions that there is no capacity for development. If the site were to come forward, there is significant likelihood that it will impact upon Jupiter Artland’s ability to continue to successfully operate and grow. The setting is vital to the ability to encourage artists and visitors to engage with the location. In this regard, Jupiter Artland have secured a commission by artist Tracey Emin which is due to be in place for the 2021 season. The landscape setting is of huge importance to this commission and Tracey’s work, and significant changes may have a negative impact on the success of those sculptures and the ability to attract new commissions. The sensitivity of Bonnington, in particular, and Overshiel have been clearly stated in the Landscape Capacity Study in terms of the existing landscape designations and cultural heritage, as well as the open views which are afforded across the landscape. These open views form an important aspect of Jupiter Artland’s setting and what attracts artists and visitors to the site. Development within that setting would have a detrimental impact on Jupiter Artland and its functions. Jupiter Artland is not satisfied that its interests would be protected through the proposals presented to date.

2. Transport Infrastructure Constraints The site is not considered to be sustainable in terms of its connectivity to existing public transport links, with reliance on the private car being highly likely. This is supported by the various background studies which support the Choices document. It appears that Area 5 - Calderwood has been chosen as a ‘reasonable alternative’ within the Choices document due to the proximity of the existing development proposals within West Lothian Council at East Calder also known as Calderwood. Whilst this may be attractive in principle, the site has poor connectivity and little relationship with the City of Edinburgh. Furthermore, it is disjointed from the main development and carries urban sprawl into the view lines that the landscape capacity study identified as being of importance. If the

Customer Ref: 00418 Response Ref: ANON-KU2U-GFW6-1

Supporting Info Yes

Name Deirdre Thom

Email deirdre.thom@eu.jll.com

Response Type Agent / Consultant

On behalf of: Jupiter Artland

site was allocated it would result in a significant increase in vehicle trips due to huge reliance on the private car. In addition, the capacity of the road network to manage these increases is questioned. The Environmental Report notes that with respect both Bonnington and Overshiel, that the "Site does not have good public transport accessibility and site does not provide opportunity for active travel connecting to the national cycle network" (City Plan Environmental Report, page 192)The allocation of this site is not considered to support the Council's aspirations as set out in the Choices document to become carbon neutral by 2030 nor will it help to reduce reliance on the private car as set out under Choice 7. We have also undertaken a high-level review of the Edinburgh Strategic Sustainable Transport Study. The document identifies 10 transport corridors which represent those that are more likely to be suitable for transit-based solutions. The purpose of the Phase 1 study is to examine each of these corridors and identify those that should be prioritised for more detailed consideration of transit options as part of a more detailed Phase 2 study, which will include a transport appraisal for the proposed City Plan 2030.The Calderwood site does not sit within or immediately adjacent any of these corridors. The Choices document identifies transportation infrastructure required to support Calderwood's development. This includes public transport links through the site and to a public transport hub - tram/bus interchange, connections through the site with a focus on sustainable transport modes and connections to neighbouring developments and employment uses. We would also question the ability of the existing road network to cope with this increased capacity. The ability for these improvements to be delivered in order to support the scale of development envisaged, within the Plan period, has not been demonstrated. It is considered that more accessible sites have been identified within City Plan Choices.3. Community infrastructure capacityDelivery of the Calderwood site would require three new primary schools and one secondary school to be built to support the allocation. Where and how these schools would be delivered is unclear, as part of the site appears to fall within the West Lothian Council. Clarity is needed as to how these would be delivered if the site is to be taken forward to the Proposed Local Development Plan.Overall ConclusionThe Housing Study which informs the Choices document concludes that the sites of Bonnington and Overshiel, which Calderwood has been formed from, are not located within a SESplan SDA, have poor accessibility and their development would result in landscape impacts. As such, it is not clear how the site at Calderwood can reasonably be assessed as being suitable for development by The City of Edinburgh Council, given the constraints to development which have been identified. The Housing Study states that the sites should be considered as part of the wider Calderwood development in West Lothian and it appears that this is the main driver for expanding development in this location.The Housing Study also concludes that as the sites are not within the SESplan spatial strategy area they should be considered only as reasonable alternatives to other sites within the SDAs. (Emphasis added) (Housing Study, page 191 & P 227). As such, taking a sequential view, it is considered that sites within the Urban Area should be delivered first, followed by those within SDAs, and lastly where only absolutely necessary by release of suitable greenfield sites.Jupiter Artland is an important international, national and local cultural asset which contributes significantly to the landscape, cultural heritage and economy. In summary, Jupiter Artland wish to reiterate the following:1. Jupiter Artland lies within a sensitive landscape which includes designated assets such as a Garden and Designed Landscape and a number of listed buildings. The setting of these assets requires protection.2. Jupiter Artland is a world-renowned cultural attraction and is an asset to the local and national landscape, which should be protected. It has been ranked by The Guardian as one of the "10 best outdoor art installations worldwide" and was recently listed by The Times as one of 'five of the best galleries and art spaces' in the UK, alongside the V&A in Dundee.The existing setting of Jupiter Artland is fundamental to its success and function and its ability to continue to attract world renowned artists to exhibit their work. Alterations to that setting have the potential to jeopardise the future functioning of the site. It also plays an important part in the cultural identity of this local area and indeed the wider city region, through its many programmes including the pioneering and acclaimed learning and outreach programme to engage with every child in Scotland by offering free school visits throughout the year. We question the ability of the Park to continue to attract the best international artists and associated investment in the park, which will secure its continued success, if the proposals for Calderwood are to come forward.3. The area of search

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

identified on Map 18 Area 5 Calderwood is seemingly intended to be an extension of the development ongoing within West Lothian Council area. This appears to be unjustified urban sprawl into a landscape that has been assessed as having no capacity for development in landscape and visual terms, but also with respect existing transport and community infrastructure capacity. The allocation of this site would be to disregard the findings of the significant work undertaken in the background studies to assess the capacity of sites for development.4. The Calderwood site has a very limited relationship with the City of Edinburgh in terms of public transport links, active travel links and links into the green network. The existing road network is also not designed to support the level of traffic demand that the development would result in. 5. This development will be heavily reliant on the private car due to the lack of public transport links, its isolation from the city and major employment hubs and local infrastructure. The site is not sustainable and does not meet CEC's own objectives for City Plan 2030 to become carbon neutral by 2030. To conclude, the Calderwood site does not meet the high aspirations which have been set in terms of future policy provisions as set out within the MIR, such as reduced reliance on the car, directing development to areas with existing infrastructure capacity, encouragement of active travel, and a focus on delivering housing within the 'Urban Area' to avoid greenfield release. The key concern for Jupiter Artland in respect of the Calderwood site relates to the part of the proposed housing land allocation which extends out to the east and lies to the northern boundary of Jupiter. This extension of urban sprawl would have the most significant impact and cause the most damage to Jupiter Artland's function, by impacting on the important view cones and the panoramic views identified in a number of landscape studies. For these reasons the site at Calderwood should not be allocated in the Proposed Local Development Plan.

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:

00418

Response Ref:

ANON-KU2U-GFW6-1

Supporting Info

Yes

Name

Deirdre Thom

Email

deirdre.thom@eu.jll.com

Response Type

Agent / Consultant

On behalf of:

Jupiter Artland

Choice 12 C

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

Short Response

No

Explanation

Choice 12 C

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

Short Response

No

Explanation

Choice 12 D

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

Short Response

No

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

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

Supporting Info
Email

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

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

Supporting Info
Email

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

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

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

Supporting Info
Email

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

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

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

Supporting Info
Email

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

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

Supporting Info
Email

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

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

Customer Ref:

00418

Response Ref:

ANON-KU2U-GFW6-1

Supporting Info

Yes

Name

Deirdre Thom

Email

deirdre.thom@eu.jll.com

Response Type

Agent / Consultant

On behalf of:

Jupiter Artland

Choices for City Plan 2030

Representation on behalf of Jupiter Artland

Introduction

JLL represent Jupiter Artland, as planning and development advisors. On behalf of Jupiter Artland, we are pleased to respond to the City of Edinburgh Council's (CEC) Main Issues Report (MIR) consultation 'Choices for City Plan 2030'.

This paper responds to the questions contained within the MIR consultation 'Choices for City Plan 2030' which are relevant to the potential allocation of greenfield land at Calderwood (Area 5) for housing led development, as part of the next Local Development Plan for Edinburgh.

The responses have been drafted taking into consideration the information within the MIR: Choices for City Plan 2030 consultation as well as the various background studies. These include a Housing Study, Environmental Report, Landscape and Visual Impact Assessment and Strategic Sustainable Transport Strategy.

Context

Jupiter Artland¹ is an award-winning contemporary sculpture garden, founded in 2009. It has since welcomed over 300,000 visitors and is home to unique, site-specific sculptures by internationally renowned artists which has seen it grown into one of Scotland's most significant arts organisations. It was nominated for ArtFund's Museum of the Year in 2016 and has been ranked by The Guardian as one of the '*10 best outdoor art installations worldwide*'. Set over 100 acres of meadow, woodland and five indoor gallery spaces, Jupiter Artland is home to 35 permanent site-specific sculptures, as well as a programme of exhibitions and events including learning and outreach programmes aimed at engaging every child in Scotland, by offering free school visits throughout the year. Further details about Jupiter Artland and its function are provided at appendix 1 to this response.

The objective of this response by Jupiter Artland is to protect this important designed landscape now and, in the future, to ensure the continued success of the site. The response is intended to be a positive contribution to the Choices consultation.

Choices for City Plan 2030

Following the various assessment's undertaken by CEC, Area 5 Calderwood was identified as one of a number of what was termed 'reasonable alternatives' to the CEC's 'preferred approach' of 'delivering all housing within the urban area'.

The below extract from the Choices document sets out the key principles which will require to be considered if this site was to come forward, and we understand that these have been informed by the various background papers referred to above.

¹ <https://www.jupiterartland.org/>

Area 5 - Calderwood

This site is adjacent to development at West Lothian. New housing, if required in this location, could link to development and new education infrastructure being delivered at Calderwood. If allocated, development at Calderwood could be supported on the land identified on Map 14, provided that development complies with the policies in City Plan, and a Place Brief, delivering the following (but not limited to) principles.

Green/Blue Infrastructure

- Address the setting of Bonnington House and designed landscape at Jupiter Artland - the principles of the designed landscape and the setting of the art sculptures should be reflected in the design and layout of the site. Views from and to the sculptures and designed landscape features to be protected.
- Provide a well connected ecologically diverse landscape which enhances biodiversity / or provides a net gain to biodiversity.
- Provide a landscape framework that creates a new extension to Calderwood.
- Provide a landscape adaptable to future climate change including above ground water management areas, linear conveyance water features for surface water incorporating natural processes to replicate greenfield conditions for attenuation of discharge rate and volume.
- Provide a robust green belt edge
- Use analysis of the wider site context, including heritage and landscape, to assess development capacity and identify measures to avoid negative impact.
- Use masterplan(s) to show how a site or a series of sites will be developed, setting the framework for efficient land use, connectivity, urban design, landscape/open space design, built form, infrastructure and service provision.
- Support creation or expansion of integrated, mixed-use neighbourhoods that combine residential, employment, commercial and community uses with easy access to facilities, services and good public transport connections.

- Ensure built form achieves a strong sense of place that reflects the special visual and spatial character of the city.

Uses

- Provide high-density residential – a minimum of 65 units per hectare on average across all areas and at least 100 units/hectare in specified areas.
- Include a mix of uses – community, local centre, new schools, businesses and industrial land.

Transport Infrastructure

- Public transport to be provided through the site and to a public transport hub - tram/bus interchange.
- Provide connections through the site with a focus on sustainable transport modes and connections to neighbouring developments and employment uses.
- Any vehicular routes through the site should have bus priority measures and active travel routes.
- Transport Infrastructure requirements will be updated as we prepare the proposed plan, through a Transport Appraisal.

Education Infrastructure

- New primary schools – 3
- New secondary School - 1

NOTE: new housing development here could link to education infrastructure being delivered to support the Calderwood site.

Grey infrastructure

Underground pylons

We have set out our response following the format of the online consultation portal with a particular focus on those questions from Choices for City Plan 2030 that are of relevance to Jupiter Artland's interests. We have focused on those questions or issues insofar as they relate to greenfield land release and the proposal to allocate the Calderwood site for housing led development land.

Choice 1 - Making Edinburgh a sustainable, active and connected city

1A. 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?

The principle of this approach is accepted generally. However, we would note that with respect Area 5 – Calderwood, the proposed greenfield land release, the site is not in close proximity to existing public greenspace provision.

It is noted within the Green Network assessment of the area known as Bonnington (which Calderwood has been formed in part from) that *“Most of the site may not be considered of value for the strategic green network, due to lying outwith identified green network opportunity areas and having no identified existing or potential use as part of the network.”* But goes on to state that the site includes the Jupiter Artland sculpture park and designed landscape, *“which is in active use as a cultural attraction and has value as a potential component of the green network. Any development should protect the setting and important view cones around the park.”* (Housing Study, page 191)

The importance of protecting Jupiter Artland's setting is supported and we would reiterate the significant importance of this in protecting the view cones around the park to enable the facility to continue to operate successfully.

However, we would also wish to clarify that Jupiter Artland is a charitable commercial operation and while the Park has an important role in the local cultural landscape, its presence should not be used as justification for the allocation of housing, given the site is in private ownership. Its function is distinct from residential use and would be

undermined by a housing land allocation alongside it. It is not appropriate for Jupiter to be used as amenity parkland for a new greenfield housing development.

In addition, the provision of public open spaces on land adjacent the park would undermine the capability of the park to operate successfully in terms of control of access or the ability to attract high profile artists if the unique setting of the park is altered. If the visitor experience is compromised this will reduce visitor footfall. The allocation of housing within the view cones from the estate would undermine the setting, impacting upon the ability of the park to attract internationally renowned artists and visitors. The creation of open space adjacent to the boundaries will bring about uncontrolled access, which will impact on the ability of the park to operate commercially and introduce unacceptable risk to art installations. Conversely the planting of boundaries to hem in Jupiter Artland would interrupt the open views that contribute to the Garden and Design Landscape and the setting of the park which is so crucial to the ability to attract interest from the international art world, and which have been identified in the Council's own background studies.

For these reasons, we would question the justification for allocating housing in areas where there is not already green network capacity or connections available, meaning that new sites would not be capable of meeting this policy requirement.

1E. 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?

Jupiter Artland has no objection to this principle, however as noted above, it is expected that these green spaces should be provided without detriment to existing landscape setting.

Choice 2 Improving the quality and density of development

2B. 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 or No Explain.

The proposals set out in the Choices document are for 65 dwellings per hectare or 100 dwellings per hectare on specified sites. Dependent on the site and its context, we would question these densities, and would argue that these are unlikely to be suitable in the context of the setting and more rural greenfield locations such as for example at Calderwood and would not be in keeping with the nature of the rural environment. These densities are likely to have an impact on the surrounding landscape and are more appropriate in urban areas.

Choice 4- Creating Place Briefs and supporting the use of Local Place Plans in our communities

4A. 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. Jupiter Artland supports the requirement to produce Place Briefs for areas and sites within the city in consultation with local communities to ensure potential localised impacts are mitigated through design, site layout and landscape mitigation as may be required.

Choice 5 - Delivering community infrastructure

5A. 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, Jupiter Artland agrees with this approach.

The importance of directing new development (whether within the urban area or on greenfield land) to locations that have existing infrastructure capacity, including education, healthcare and sustainable transport is fundamental. However, it is noted that some of the sites which have been identified as potential for greenfield land release within the Choices for City Plan document do not meet these requirements and it is unclear how they could do so within the plan period.

Specifically relating to Calderwood, this site has been formed from the sites referred to as Bonnington and Overshiel from the Sector 5 Site Assessment as shown on Page 217 of the Housing Study document. Both sites have been assessed within the Housing Study as being ‘potentially suitable for development’, despite numerous areas where they do not meet the criteria required, e.g. not within SESplan Strategic Development Area (SDA); no primary or secondary school capacity; poor accessibility; and impacts to the landscape.

With respect Bonnington, the site is not within an SDA, has no public transport links, does not benefit from active travel routes, has no capacity in terms of community infrastructure (schools) and due to landscape impacts has no capacity for development. More specifically with respect schools, in light of the above policy, the Sector Assessment notes that *“The site does not have sufficient community infrastructure capacity to support development and no appropriate existing intervention has been identified to address this. A new primary school would be required. A new secondary school would be required. The Council’s preference is to deliver new secondary schools with a capacity for 1200 pupils. If a new 1200 secondary school was delivered it could support a significant amount of additional housing development, but it would have to serve a wide catchment area so good active travel and transport links would be important. Capacity could be partially addressed through provision of schools included as part of the Calderwood development in West Lothian, subject to discussion with this authority.”*

Regardless of the approach, either through new schools within Edinburgh or across the boundary into West Lothian, there is significant uncertainty as to the ability to deliver this site in the plan period. The active travel and transport links are also not satisfactory to support a school of the capacity required, with no clear plan as to how it would be delivered.

With respect Overshiel, the assessment concludes that the site is not within an SDA, has no active travel links, with the exception of pedestrian routes to local convenience stores, no public transport links, and no community infrastructure capacity. It is noted the site is within the West Lothian school’s catchment which may result in additional concerns as to available capacity, as it is not clear how the schools requirement could be delivered through City Plan 2030.

The purpose of this emerging policy is to ‘Direct development to where there is existing infrastructure capacity’.

Considering the above, it has not been demonstrated that the required capacity is currently available, nor has it been demonstrated that it could be delivered through the plan period.

All of the background studies which have been prepared as part of the preparation for Choices for City Plan have demonstrated that there is insufficient existing capacity, in terms of education and transport infrastructure in relation to the Calderwood site.

Site’s which cannot reasonably meet the required infrastructure needed for development to function should be removed from consideration and a focus made on sites which are better connected, within SDA’s, have existing education capacity and are more sustainable in terms of access to green and blue infrastructure which in turn limits the impact on the surrounding area.

Choice 6 - Creating places for people, not cars

6A. 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?

The principle of this policy is considered to be reasonable, however there seems to be a situation where some of the sites proposed for greenfield release in particular Calderwood do not meet the terms of this emerging policy, and it is difficult to envisage how development would be able to deliver that infrastructure within the plan period. For example, the site at Calderwood, is not considered to be a sustainable site in terms of its access to public transport and active travel infrastructure and would fail to meet the terms of this proposed new policy.

Choice 12 Building our new Homes and infrastructure

12A . Which option do you support? Option 1 (Council/Partners/Urban Area) Option 2 (Market/Greenfield) Option 3 (Blended approach)

Explain why you support that option, or why haven't chosen an option

Option 1 followed by Option 3.

Jupiter Artland recognises the need for new housing sites to be identified to meet Edinburgh's housing land requirements. It is considered that these should be delivered within the Urban Area where possible. However, it is recognised that this approach may not deliver all of the housing that Edinburgh needs. As such, we would suggest the fall back is a blended approach which includes some greenfield land release to meet the targets needed.

If greenfield land release is required, the preference would be to focus on the most sustainable sites, in closer proximity to existing public transport corridors/infrastructure and with access to more sustainable transport modes and employment centres. For example, those within the SDA are considered to be most suitable and are more appropriate in terms of the existing (and proposed) policy context, which has identified these locations for strategic development as part of the existing spatial strategy.

In many cases these locations are capable of meeting the requirements of other council policy principles such as access to green and blue infrastructure, proximity to employment centres, and existing or deliverable community infrastructure. Sites outwith SDA's will need far greater interventions in the form of community and transport infrastructure to ensure they are deliverable within the Plan period.

12B. Do you support or object to any of the proposed greenfield areas? (Please tick all that apply)

Calderwood Kirkliston West Edinburgh East of Riccarton South East Edinburgh

Explain Why

Jupiter Artland objects to the greenfield site identified as Calderwood.

This is due to the potential impacts on the functioning of Jupiter Artland and the impact it would have on its future success. Development which encroaches on the boundaries of the park will have a significant impact on the landscape setting of Jupiter Artland and its designed landscape, with particular focus on the extent of the proposed allocation which extends eastwards and lies to the north of the Jupiter boundary. The landscape setting is a critical factor for many of the artists and sculptors that come to Jupiter, many utilising the backdrop its landscape offers as part of their installations. Development that encroaches on the site, has the potential to impact on committed art installations or attractions if the landscape setting is altered.

The background studies which have informed Choices for City Plan have identified a number of constraints to the development of Calderwood which should not be disregarded, and which require further consideration by CEC prior

to the site being taken forward to the Proposed Local Development Plan. These relate to landscape impacts, which are of most significance for Jupiter Artland's setting and function; transport; and community infrastructure.

1. Impacts on Landscape Character

The proximity to a Garden and Designed Landscape is a significant concern in terms of the allocation of Calderwood and in particular the importance of the designed landscape and its essential setting to the successful future operations of Jupiter Artland.

One of the background studies includes an Environmental Report (ER) which has considered the potential environmental effects of potential new development sites to inform the preferred approach and reasonable alternatives to be identified in the MIR.

The Environmental Report's Non-Technical Summary notes that some of the 'reasonable alternative' Choices, which Calderwood is identified, are expected to have significant negative environmental effects, specifically Choice 12: Building our new homes and infrastructure. The findings note that the development of greenfield sites is expected to have more significant impacts than brownfield sites.

Appendix 3 to the Environmental Report provides a Cumulative Assessment of the sites considered, within Edinburgh and in terms of adjacency to other councils. With respect Calderwood the cumulative assessment states *"The site ... would have a modest (cross boundary) visual and landscape cumulative impact when combined with the existing Calderwood development. Its location adjacent to Jupiter Artland makes it sensitive in terms of landscape and visual impacts could be mitigated as addressed in the Greenfield site assessment (appendix 5 of ER)."*

The potential allocation around Calderwood could not be satisfactorily mitigated without impacting on the important view cones out of the site and thus the function of Jupiter Artland, for the reasons as set out within this representation. This is of most significance in relation to the part of the proposed allocation which extends eastwards and lies to the north of the boundary of the Garden and Designed Landscape as it would impact the view cones out from the site.

Appendix 5: Greenfield Site Assessment to the Environmental Report sets out the assessment of sites from an environmental perspective and identifies the constraints to development and the necessary mitigation, referred to above, to minimise / contain impacts.

Of note the assessment of Bonnington (West) states with respect mitigation that *"The design of the development should be justified and seek to fully understand and preserve and/or enhance the character and appearance of the listed building/structures including their setting"*. It goes on to state that, *"Masterplanning should mitigate impact on the views and setting of the Jupiter Artland sculpture park and designed landscape by allowing open viewlines from key areas of the park across the surrounding sites."* (City Plan Environmental Report, page 192)

The importance of the landscape is further demonstrated through CEC's Survey of the Bonnington Garden and Designed Landscape, which identifies an 'essential setting' outwith the designation boundary. The Site Plan, which is presented at Appendix 1 to this response, also identifies panoramic views out from the site. The allocation at Calderwood will impact directly onto those views.

Jupiter Artland wishes to stress the importance of protecting that 'essential setting', the panoramic views and the unique cultural attraction which it offers.

The allocation of housing land will impact significantly on Jupiter Artland's operation, due to impacts on the important views out from the Park and also in terms of the surrounding landscape which is of huge importance to the setting and which is one of the main attractions for artists exhibiting their works at the site.

The proposals for Calderwood, that we have seen to date, significantly undermine this objective of protecting the essential setting and view cones out from the site, due to the proximity of placing amenity land/screening adjacent the immediate boundary of the Jupiter Artland site. The provision of amenity land in-between the potential allocation and the Jupiter Artland site undermine its function and setting.

Similarly, with respect Overshiel, it states that *"Appropriate open space should be provided within the development to meet open space standards. The design of the development should be justified and seek to fully understand and preserve and/or enhance the character and appearance of the listed building/structures including their setting."* (City Plan Environmental Report, page 193)

We would reiterate the importance of offsetting and views to Jupiter Artland. Maintaining the important views which are afforded from the site are vital to its success and function. The information presented to date does not go far enough to mitigate the impacts to Jupiter.

Further analysis of potential greenfield sites has been done as part of a Landscape and Visual Impact Assessment background paper and the previously mentioned Environmental Report, which have concluded that in terms of the landscape impacts, **Overshiel and Bonnington (which Calderwood has been formed from) have no capacity for development** (Emphasis added). It states that Bonnington was excluded from the field assessment, due to the presence of constraints, including inclusion in the Special Landscape Area, a designed landscape and its setting. Relating to Overshiel, the assessment concludes no capacity for development due to its openness, and physical and perceptual isolation from existing settlements.

These assessments appear to have been disregarded in the identification of Calderwood as a 'reasonable alternative' for delivering the necessary housing land within Edinburgh. It is considered that a housing land allocation would directly contravene the findings of the capacity study and the firm conclusions that there is no capacity for development.

If the site were to come forward, there is significant likelihood that it will impact upon Jupiter Artland's ability to continue to successfully operate and grow. The setting is vital to the ability to encourage artists and visitors to engage with the location. In this regard, Jupiter Artland have secured a commission by artist Tracey Emin which is due to be in place for the 2021 season. The landscape setting is of huge importance to this commission and Tracey's work, and significant changes may have a negative impact on the success of those sculptures and the ability to attract new commissions.

The sensitivity of Bonnington, in particular, and Overshiel have been clearly stated in the Landscape Capacity Study in terms of the existing landscape designations and cultural heritage, as well as the open views which are afforded across the landscape. These open views form an important aspect of Jupiter Artland's setting and what attracts artists and visitors to the site. Development within that setting would have a detrimental impact on Jupiter Artland and its functions.

Jupiter Artland is not satisfied that its interests would be protected through the proposals presented to date.

2. Transport Infrastructure Constraints

The site is not considered to be sustainable in terms of its connectivity to existing public transport links, with reliance on the private car being highly likely. This is supported by the various background studies which support

the Choices document. It appears that Area 5 - Calderwood has been chosen as a 'reasonable alternative' within the Choices document due to the proximity of the existing development proposals within West Lothian Council at East Calder also known as Calderwood. Whilst this may be attractive in principle, the site has poor connectivity and little relationship with the City of Edinburgh. **Furthermore, it is disjointed from the main development and carries urban sprawl into the view lines that the landscape capacity study identified as being of importance.** If the site was allocated it would result in a significant increase in vehicle trips due to huge reliance on the private car. In addition, the capacity of the road network to manage these increases is questioned.

The Environmental Report notes that with respect both Bonnington and Overshiel, that the *"Site does not have good public transport accessibility and site does not provide opportunity for active travel connecting to the national cycle network"* (City Plan Environmental Report, page 192)

The allocation of this site is not considered to support the Council's aspirations as set out in the Choices document to become carbon neutral by 2030 nor will it help to reduce reliance on the private car as set out under Choice 7.

We have also undertaken a high-level review of the Edinburgh Strategic Sustainable Transport Study. The document identifies 10 transport corridors which represent those that are more likely to be suitable for transit-based solutions. The purpose of the Phase 1 study is to examine each of these corridors and identify those that should be prioritised for more detailed consideration of transit options as part of a more detailed Phase 2 study, which will include a transport appraisal for the proposed City Plan 2030.

The Calderwood site does not sit within or immediately adjacent any of these corridors.

The Choices document identifies transportation infrastructure required to support Calderwood's development. This includes public transport links through the site and to a public transport hub - tram/bus interchange, connections through the site with a focus on sustainable transport modes and connections to neighbouring developments and employment uses. We would also question the ability of the existing road network to cope with this increased capacity. The ability for these improvements to be delivered in order to support the scale of development envisaged, within the Plan period, has not been demonstrated.

It is considered that more accessible sites have been identified within City Plan Choices.

3. Community infrastructure capacity

Delivery of the Calderwood site would require three new primary schools and one secondary school to be built to support the allocation. Where and how these schools would be delivered is unclear, as part of the site appears to fall within the West Lothian Council. Clarity is needed as to how these would be delivered if the site is to be taken forward to the Proposed Local Development Plan.

Conclusion

The Housing Study which informs the Choices document concludes that the sites of Bonnington and Overshiel, which Calderwood has been formed from, are not located within a SESplan SDA, have poor accessibility and their development would result in landscape impacts. As such, it is not clear how the site at Calderwood can reasonably be assessed as being suitable for development by The City of Edinburgh Council, given the constraints to development which have been identified. The Housing Study states that the sites should be considered as part of the wider Calderwood development in West Lothian and it appears that this is the main driver for expanding development in this location

The Housing Study also concludes that as the sites are not within the SESplan spatial strategy area they **should be considered only as reasonable alternatives to other sites within the SDAs**. (Emphasis added) (Housing Study, page 191 & P 227). As such, taking a sequential view, it is considered that sites within the Urban Area should be delivered first, followed by those within SDAs, and lastly where only absolutely necessary by release of suitable greenfield sites.

Jupiter Artland is an important international, national and local cultural asset which contributes significantly to the landscape, cultural heritage and economy. In summary, Jupiter Artland wish to reiterate the following:

1. Jupiter Artland lies within a sensitive landscape which includes designated assets such as a Garden and Designed Landscape and a number of listed buildings. The setting of these assets requires protection.
2. Jupiter Artland is a world-renowned cultural attraction and is an asset to the local and national landscape, which should be protected. It has been ranked by The Guardian as one of the *"10 best outdoor art installations worldwide"* and was recently listed by The Times as one of 'five of the best galleries and art spaces' in the UK, alongside the V&A in Dundee.

The existing setting of Jupiter Artland is fundamental to its success and function and its ability to continue to attract world renowned artists to exhibit their work. Alterations to that setting have the potential to jeopardise the future functioning of the site.

It also plays an important part in the cultural identity of this local area and indeed the wider city region, through its many programmes including the pioneering and acclaimed learning and outreach programme to engage with every child in Scotland by offering free school visits throughout the year. We question the ability of the Park to continue to attract the best international artists and associated investment in the park, which will secure its continued success, if the proposals for Calderwood are to come forward.

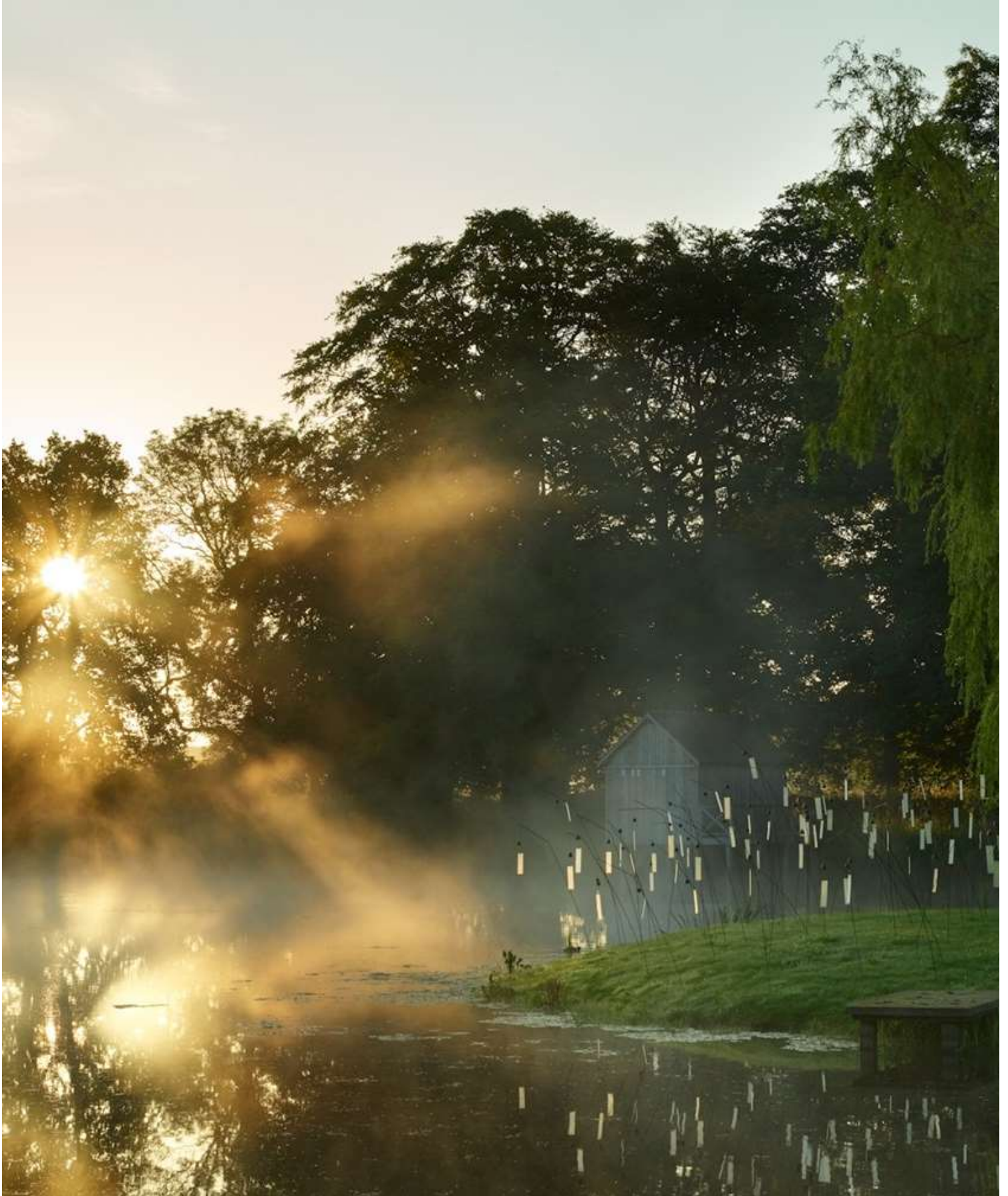
3. The area of search identified on Map 18 Area 5 Calderwood is seemingly intended to be an extension of the development ongoing within West Lothian Council area. This appears to be unjustified urban sprawl into a landscape that has been assessed as having no capacity for development in landscape and visual terms, but also with respect existing transport and community infrastructure capacity. The allocation of this site would be to disregard the findings of the significant work undertaken in the background studies to assess the capacity of sites for development.
4. The Calderwood site has a very limited relationship with the City of Edinburgh in terms of public transport links, active travel links and links into the green network. The existing road network is also not designed to support the level of traffic demand that the development would result in.
5. This development will be heavily reliant on the private car due to the lack of public transport links, its isolation from the city and major employment hubs and local infrastructure. The site is not sustainable and does not meet CEC's own objectives for City Plan 2030 to become carbon neutral by 2030.

To conclude, the Calderwood site does not meet the high aspirations which have been set in terms of future policy provisions as set out within the MIR, such as reduced reliance on the car, directing development to areas with existing infrastructure capacity, encouragement of active travel, and a focus on delivering housing within the 'Urban Area' to avoid greenfield release.

The key concern for Jupiter Artland in respect of the Calderwood site relates to the part of the proposed housing land allocation which extends out to the east and lies to the northern boundary of Jupiter. This extension of urban

sprawl would have the most significant impact and cause the most damage to Jupiter Artland's function, by impacting on the important view cones and the panoramic views identified in a number of landscape studies. For these reasons the site at Calderwood should not be allocated in the Proposed Local Development Plan.

Appendix 1: About Jupiter Artland



Jupiter Artland Foundation



“With new commissions added every year, this glorious sculpture park is a wonderland of world-class, often large-scale outdoor art from artists such as Joana Vasconcelos, Cornelia Parker, Anish Kapoor, Phyllida Barlow, Anya Gallaccio, Antony Gormley, Nathan Coley, Andy Goldsworthy, Helen Chadwick, Charles Jencks and more. Jupiter Artland is much loved by the public and runs a pioneering Scotland-wide art education and engagement programme.”

Nancy Durrant, *The Times*, 2019

About Jupiter Artland

Jupiter Artland Foundation opened to the public in 2009 and has since become one of Scotland’s most important contemporary art institutions. Nominated for **Museum of the Year** in 2016, and awarded **Five Stars** by VisitScotland annually since 2018, Jupiter Artland has welcomed over 300,000 visitors and is home to unique, site-specific sculptures by internationally renowned artists including Antony Gormley OBE, Anish Kapoor CBE, Phyllida Barlow CBE, Andy Goldsworthy OBE, Cornelia Parker OBE, Ian Hamilton Finlay CBE and Tracey Emin CBE (forthcoming 2021).

A registered charitable foundation, Jupiter’s pioneering approach to commissioning acclaimed artists within the landscape, which is unique internationally, has led to the creation of Scotland’s most important collection of site-specific sculpture. Recognised by *The Guardian* as one of the **‘10 best outdoor art installations worldwide’** Jupiter Artland is a valued cultural asset, with a vision to continue to grow the collection in tandem with the landscape, with new major artworks joining the Collection each year. The Collection is fully accessible to the public between May and September, with **free learning** visits for Schools across Scotland operating throughout the whole year.

Jupiter Artland’s ground-breaking **Learning Programme’s** vision is to engage **Every Child in Scotland**, through visits with hands-on activities or through Jupiter’s pioneering digital projects. Described by BBC Arts Editor **Will Gompertz** as a “jewel of an institution”, highlights of Jupiter Artland Foundation’s forthcoming programme include a major new permanent sculpture by **Tracey Emin CBE** accompanied by her first gallery exhibition in Scotland in over a decade; an expansive new permanent installation by Scottish maverick artist **Rachel Maclean** and **ORBIT Youth Council**, a pioneering engagement programme bringing together 16 to 18 year-olds from across Scotland, from Orkney to Mallaig, and connecting them with outstanding contemporary artists.

- 1999: Site acquired by current owners
- 2009: Jupiter Artland opens to the public
- 2016: Nominated for **Museum of the Year** by Art Fund
- 2018: Receives and retains **Five Star Visitor Attraction** status from VisitScotland
- 2019: Wins **Edinburgh International Festival Herald Angel Award**
- 2020: Announces **Tracey Emin CBE** and **Rachel Maclean** for 2021 artistic programme

Plans for Jupiter Artland

Jupiter Artland’s 2021 artistic programme will be our most ambitious to-date, with **Tracey Emin CBE** and **Rachel Maclean**, who represented Scotland at the Venice Biennale, both producing new, permanent artwork for sites personally chosen by each artist. Our international reputation continues to grow, with our inaugural participation at Edinburgh International Festival **Trisha Brown: In Plain Site** receiving five-star reviews from *The Times UK*, *The New York Times* and the prestigious **Herald Angel Award** with future productions in the pipe-line from 2021 onwards.

Our audience reach continues to grow by 20 to 25% annually, with a view to accommodating **250,000 visitors per year** by 2025. Our investment plans for 2020-2030 include an expansion of our visitor services, including increased provisions for public transport, expanded retail and dining opportunities, which are already ranked as ‘outstanding’ by **VisitScotland**. Our seasonal programme of exhibitions, festivals and masterclasses continues to attract internationally renowned visual artists, musicians, writers and thinkers, connecting them to communities in West Lothian, Edinburgh and Scotland more broadly, with initiatives like **Jupiter Rising** and our **Rising Residency** engaging BAME, LGBTQ+ and under-represented communities. 2021 will also see our inaugural **ORBIT commission**, where internationally renowned artists making artwork for Jupiter Artland trial new ways of connecting with diverse audiences and linking up with our Learning Programme to achieve our aim to reach **Every Child in Scotland**. What makes Jupiter Artland unique is our connection to site and landscape, which underpins all the charitable activity of our organisation.

Future of Jupiter Artland in the Context of Potential Greenfield Land Release

Edinburgh City Council's **Survey of Gardens and Designed Landscapes** includes Jupiter Artland as listing **133 Bonnington**. Given the importance both of its historic landscape and the contemporary artwork within it, the site is ranked as '**outstanding**': <https://www.edinburgh.gov.uk/downloads/file/23011/bonnington-house>

The site contains three **Category A Listed Buildings**, as identified by Historic Environment Scotland. These features and their setting contribute to the success and interest of Jupiter Artland. Source:

<http://historicscotland.maps.arcgis.com/apps/Viewer/index.html?appid=18d2608ac1284066ba3927312710d16d>

Jupiter Artland have invested significantly, both time and money, in its growth and development over the past 10+ years. We do not object to the principle of greenfield land release and acknowledge there may be a need to provide more housing land to meet City of Edinburgh Council's need. Our main concern relates to the extent and potential impact the expansion of housing at Calderwood may have on the setting and function of Jupiter Artland, if not managed carefully.

The open landscape which surrounds Jupiter Artland provides an important buffer to the success of our operation (see Fig. 1 of Jupiter Artland's Essential Setting, Principle Vistas and Panoramic Views).

Re-designating this area as public amenity space, which is indicated in the Calderwood housing development, would pose a significant risk to Jupiter Artland's operations as follows:

- Existing high-value artwork exposed to risk of vandalism or destruction;
- Future artists may withdraw from our artistic programme as essential panoramic views materially altered;
- Impossible to control unauthorised access without erection of security wall or barrier, further diminishing the essential setting of artworks within the site.

As we have set out above, there are many exciting prospects for the development of Jupiter Artland Foundation over the coming years, with significant investment by world-class artists already committed. There is a very real risk that this investment will no longer proceed if the very essence of what has attracted it were to be altered. Jupiter Artland needs to be protected from development encroaching upon its boundaries to maintain the important landscape view and setting which make it a success.

'Jupiter Artland is an inspired place where a long history of British engagement with landscape continues. Sculpture does not need shelter, either intellectual or physical, and can stand in the elements, encouraging dialogue between human time, the time of the seasons and the time of geology.' Jupiter Artland is not just a Jacobean manor house given new purpose, it is an experiment in human relations and human imagination: a workshop for the spirit, the body and the mind.'

Sir Antony Gormley



Fig. 1 Survey of Gardens and Designed Landscapes: Bonnington 133, Edinburgh City Council, 2008

Appendix 2: Map of 133 Bonnington House Garden and Designed Landscape

