

Customer Ref: 01717      Response Ref: ANON-KU2U-GWPH-W

Name Holder Planning

Response Type Agent / Consultant

On behalf of: Prestonfield Golf Club

Supporting Info Yes

Email robin@holderplanning.co.uk

Choice 1 A

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

Short Response Not Answered

Explanation Not Answered

Choice 1 B

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

Short Response Not Answered

Explanation Not Answered

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Choice **1 C**

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

Short Response

Explanation

Choice **1 D**

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

Short Response

Explanation

Choice **1 E**

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

Short Response

Explanation

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Choice 1 F

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

Short Response

Explanation

Choice 1 F

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

Short Response

Explanation

Choice 1 G

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

Short Response

Explanation

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Choice **1 H**

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

Short Response

Explanation

Choice **2 A**

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

Short Response

Explanation

Choice **2 B**

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

Short Response

Explanation

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Choice **2 C**

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

Short Response

Explanation

Choice **2 D**

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

Short Response

Explanation

Choice **3 A**

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

Short Response

Explanation

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Choice **4 A**

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

Short Response

Explanation

Choice **4 B**

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

Short Response

Explanation

Choice **5 A**

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

Short Response

Explanation

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On behalf of:

Supporting Info

Email

Choice **5 B**

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

Short Response

Explanation

Choice **5 C**

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

Short Response

Explanation

Choice **5 D1**

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

Short Response

Explanation

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On behalf of:

Choice **5 D2**

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

Short Response

Explanation

Choice **5 E**

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

Short Response

Explanation

Choice **6 A**

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

Short Response

Explanation



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Choice **6 B**

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

Short Response

Explanation

Choice **7 A**

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

Short Response

Explanation

Choice **7 B**

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

Short Response

Explanation

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Choice **7 C**

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

Short Response

Explanation

Choice **7 D**

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

Short Response

Explanation

Choice **8 A**

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

Short Response

Explanation

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Choice **8 B**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

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On behalf of:

Choice **9 A**

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

Short Response

Explanation

Choice **9 B**

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

Short Response

Explanation

Choice **10 A**

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

Short Response

Explanation

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Choice **10 B**

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

Short Response

Explanation

Choice **10 C**

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

Short Response

Explanation

Choice **11 A**

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

Short Response

Explanation

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Choice 11 B

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

Short Response: Not Answered

Explanation: Not Answered

Choice 12 A

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

Short Response: Not Answered

Explanation:

Choice 12 B1

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

Short Response: Not Answered

Explanation:

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Yes

Name

Holder Planning

Email

robin@holderplanning.co.uk

Response Type

Agent / Consultant

On behalf of:

Prestonfield Golf Club

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

Not Answered

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

Not Answered

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

Not Answered

Explanation

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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



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Yes

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Response Type

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On behalf of:

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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

Not Answered

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

Not Answered

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

Not Answered

Explanation

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Response Type Agent / Consultant  
On behalf of: Prestonfield Golf Club

Supporting Info Yes  
Email robin@holderplanning.co.uk

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** Prestonfield Golf Club do not object to any of the housing allocations proposed in Choices 2030. However, as explained in other submissions by Holder Planning in response to Q12A of the submission form, the number of greenfield allocations proposed by all three strategy options is significantly less than needed to approach meeting Edinburgh's housing need and demand. In particular there is almost a complete absence of smaller housing sites proposed on greenfield land, which could make a contribution to the significant shortfall in housing provision in the short to medium term. Although the allocation of large strategic sites is to be welcomed, past experience is that such sites will have long lead-in times and will be dependent on significant infrastructure provision, which in many cases is not yet in place. With that in mind, Prestonfield Golf Club are therefore seeking the allocation of a site for housing on the north side of Peffermill Road, opposite the Nairn Oatcakes factory. The site currently comprises two practice holes, which in the challenging financial circumstances the Club find themselves in, have been decided to be surplus to requirements (see below) A plan of the site in question is submitted in response to Q12C of the online submission form. Although the total area of the two practice holes is approximately 1 hectare, the northern part of the site, comprising approximately 0.6 hectares is identified on the SEPA flood maps as a potential flood risk. The extent of the flood plain requires further detailed investigation in order to establish the remaining area of land available for housing development, but is likely to be approximately 0.4 hectares. The developable area fronts onto Peffermill Road, with an existing vehicle access point from which a residential development could be served. The site is currently subject to a number of designations in the Adopted Edinburgh Local Development Plan, which we consider in turn: GREEN BELT The site is a very small fragment of the wider Green Belt which permeates into the City. This zoning covers the whole of Prestonfield Golf Course but is separated from the Green Belt zoning to the south by Peffermill Road, which of course is a very urban feature, characterised locally by the Nairn Oatcakes Factory. The Choices 2030 consultation has put forward the possibility of allocating large areas of existing Green Belt on the edge of the City for residential development. City Choices 2030 rightly recognises that one purpose of the Green Belt identified in Scottish Planning Policy is to guide required development to appropriate sustainable locations. The South East Scotland Strategic Development Plan (SESplan 1) recognises that the release of Green Belt land for housing development will be necessary if challenging housing targets are to be achieved. Policy 7 of SESplan 1 identifies the criteria that require to be met for a site to be allocated for housing in CityPlan 2030, as follows: a. The development will be in keeping with the character of the settlement and local area; b. The development will not undermine green belt objectives; and c. Any additional infrastructure required as a result of the development is either committed or to be funded by the developer. Crucially, the removal of this site from the Green Belt and its development for housing will not undermine Green Belt objectives. The site is extremely well contained by surrounding trees (which are to be retained) and because of its small size, its development will have no discernible impact on the wider Green Belt. The fact that the site fronts onto a busy main road, opposite a factory building, obviously lends itself to development. OPEN SPACE The site is identified as open space because of its relationship to the golf course. The land comprises practice holes and is therefore not a necessary element of the facility. The Golf Club would have preferred to keep it in its current use but, for the financial reasons explained below, its non-essential function is expendable. The majority of the site will remain in use as open space, and it may even be possible that this is maintained as public open space for

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the benefit of local residents. At present there is very little public use of the area. The loss of private open space to development will be negligible in the context of the wider area. AREA OF IMPORTANCE FOR FLOOD MANAGEMENT (northern part only) As described above, it is only proposed to develop the area to the south which is not subject to flood risk. LOCAL NATURE CONSERVATION SITE The land is currently maintained as practice golf holes, and therefore the majority of the site has no particular nature conservation value. The site is surrounded by trees and other vegetation, which will serve as a wildlife corridor. Any development of the site will therefore retain and maintain this green network. We have included this surrounding green resource on the submitted plan, only to highlight the area that requires to be protected. REASONS FOR PROPOSING HOUSING DEVELOPMENT In response to Q12C of the submission form, we have provided a letter from Prestonfield Golf Club, explaining the reasons behind this proposal to zone the land in question for housing, the text of which is set out below: "Prestonfield Golf Course has been part of the local landscape and community for 100 years now and the current Club are doing all they can to ensure that they will be around for the next 100 years. It will be no surprise to the City of Edinburgh Council that the economics of running a golf club is challenging like many other leisure activities. In an effort to provide stability and some sustainability to the golf club we are looking to maximise the use of our limited assets. The Club have increased the members subscriptions and raised two levies from the membership. Continuing to raise funds from our members is not a sustainable business plan as there will come a tipping point when increasing fees will result in the loss of members from the club rather than help the finances of the club. The two practice holes included in this representation at Peffermill are not and have never been an integral part of the James Braid designed 18-hole golf course. So, the change of use of the Peffermill area of land would have no impact on our Golf Course and are in fact surplus to the Club's operations. The change of use of this area of land would enable the club to realise some funds from this surplus piece of ground which in turn will allow the Club to sustain its operations, remain part of the community, look forward as one of the leading local clubs to continue to develop our Junior Golf further and focus on moving the club to profitability without asking the current membership to continue to dig deep to pay more and more to keep the Golf Club operational, part of the local community and the landscape of our city. In summary Prestonfield Golf Club Council who have done all they can in the last few years to keep the club functioning, really need an opportunity to develop a more strategic business plan for the sustainability of the Golf Club. The acceptance of this representation will give Prestonfield Golf Club such an opportunity." The site is small part of the Prestonfield Golf Course Assessment Area contained in the City Choices Housing Study. Because that assessment deals with a much wider area than that being proposed for development, many of its findings are of insignificant relevance to the site in question. In order to assist the Council, therefore, we have set out the conclusions of the Prestonfield Golf Course Assessment below, and provided a comments (in capital letters) on each of the conclusions in respect to the smaller site. Does the site fit within an area identified as a strategic development area? No – The site is not within an identified SDA. COMMENT: THIS IS CORRECT BUT SESPLAN 1 POLICY 7 DOES SUPPORT THE ALLOCATION OF SITES IN THE LDP WHICH ARE OUTWITH AN SDA ON THE FOLLOWING CONDITIONS: A. THE DEVELOPMENT WILL BE IN KEEPING WITH THE CHARACTER OF THE SETTLEMENT AND LOCAL AREA; B. THE DEVELOPMENT WILL NOT UNDERMINE GREEN BELT OBJECTIVES; AND C. ANY ADDITIONAL INFRASTRUCTURE REQUIRED AS A RESULT OF THE DEVELOPMENT IS EITHER COMMITTED OR TO BE FUNDED BY THE DEVELOPER AS EXPLAINED IN COMMENTS BELOW, ALL OF THESE CONDITIONS CAN BE MET. IT SHOULD ALSO BE NOTED THAT IN LDP 1, A NUMBER OF SITES OUTWITH AN SDA WERE ALLOCATED IN PREFERENCE TO SITES WITHIN AN SDA. EACH SITE SHOULD BE CONSIDERED ON ITS INDIVIDUAL MERITS REGARDING THE CRITERIA IDENTIFIED IN SESPLAN POLICY 7, WHICH DOES NOT DISTINGUISH BETWEEN SITES WITHIN OR OUTWITH THE SDA IN TERMS OF ALLOCATION. Does the site support travel by foot to identified convenience services? Yes – The site is within walking distance of local convenience services. COMMENT: AGREED Does the site support travel by foot to identified employment clusters? Yes – The site is within walking distance to employment clusters. COMMENT - AGREED Does the site have access to the wider cycle network? Yes – The site has access to the wider cycle network. COMMENT: AGREED Can the site support active travel overall through appropriate intervention? Yes – The site supports active travel overall.

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Limited points of walking access to the site and links to the Innocent Railway cycle path should be addressed through masterplanning.COMMENT: AGREEDDoes the site support travel by public transport through existing public transport network accessibility and capacity?No – The site does not support travel by public transport based on existing or incrementally improved provision.COMMENT: DISAGREE. WE PRESUME THE ABOVE CONCLUSION HAS BEEN REACHED BECAUSE THE ASSESSMENT CONSIDERS THE WHOLE OF THE GOLF COURSE AREA, SOME PARTS OD WHICH ARE NOT CLOSE TO PUBLIC TRANSPORT. HOWEVER, THE SMALL AREA OF LAND UNDER CONSIDERATION HERE IS IMMEDIATELY ADJACENT TO PEFFERMILL ROAD, WHICH IS A HIGH FREQUENCY BUS ROUTEIs the site potentially served by an identified public transport intervention project which is deliverable in the plan period to serve and accommodate development?Partially – The site has limited support for travel by public transport based on an identified major intervention deliverable within the plan period. This intervention would serve the wider south-east corridor of the city along Old Dalkeith Road and improve accessibility from this area.COMMENT – AGREED. HOWEVER, THIS PARTICULAR SITE IS ALREADY SO WELL SERVED BY PUBLIC TRANSPORT, NO ADDITIONAL INTERVENTION WOULD BE REQUIRED.Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?No – The site does not have sufficient primary school infrastructure capacity.COMMENT: DISAGREE. WE PRESUME THE ABOVE CONCLUSION HAS BEEN REACHED BECAUSE THE ASSESSMENT CONSIDERS THE WHOLE OF THE GOLF COURSE AREA AND THE VERY SUBSTANTIAL DEVELOPMENT THAT AREA COULD IN THEORY ACCOMMODATE. THE SITE IS QUESTION HAS A CAPACITY OF APPROXIMATELY 30 HOMES AND WOULD THEREFORE PRODUCE ONLY ABOUT 10 PRIMARY SCHOOL CHILDREN. THIS WOULD BE WITHIN THE CAPACITY OF THE LOCAL PRIMARY SCHOOL.Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?No – The site does not have sufficient secondary school infrastructure capacity.COMMENT: DISAGREE. WE PRESUME THE ABOVE CONCLUSION HAS BEEN REACHED BECAUSE THE ASSESSMENT CONSIDERS THE WHOLE OF THE GOLF COURSE AREA AND THE VERY SUBSTANTIAL DEVELOPMENT THAT AREA COULD IN THEORY ACCOMMODATE. THE SITE IS QUESTION HAS A CAPACITY OF APPROXIMATELY 30 HOMES AND WOULD THEREFORE PRODUCE ONLY ABOUT 6 SECONDARY SCHOOL CHILDREN. THIS WOULD BE WITHIN THE CAPACITY OF THE LOCAL SECONDARY SCHOOL.If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?Partially – The site does not have sufficient community infrastructure capacity to support development but this can be addressed through the extension of Prestonfield Primary School, subject to a feasibility study, and the delivery of additional capacity through the expansion strategy of the new Castlebrae High School.COMMENT: SEE ABOVE COMMENTS ON EDUCATIONWould development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?No – No scope is identified here due to the number of landscape constraints on the site, and its contribution to the setting of the city adjacent to Holyrood Park.COMMENT: WE AGREE WITH THIS CONCLUSION SO FAR AS THE WHOLE GOLF COURSE IS CONCERNED. HOWEVER, AS EXPLAINED ABOVE, THIS IS A SMALL, VERY WELL CONTAINED SITE, THE APPROPRIATE DEVELOPMENT OF WHICH WOULD HAVE NO SIGNIFICANT LANDSCAPE IMPACT ON THE SETTING OF THE CITY. THE PARTICULAR SITE IS ON THE OTHER SIDE OF THE GOLD COURSE FROM HOLYROOD PARK AND FRONTING ON TO PEFFERMILL ROAD, WHICH IS HEAVILY URBANISED ALREADY, ITS DEVELOPMENT IS QUITE APPROPRIATE IN BOTH A LOCAL AND CITY CONTEXT/Would development of the site avoid significant loss of landscape-scale land identified as being of existing or potential value for the strategic green network?No – The site is of value for the strategic green network, due to lying within an area identified as a green network opportunity in Edinburgh itself. The site designated as open space, currently contributes to the unbroken landscape scale multi-functional green network stretching from Midlothian to Holyrood Park and is in active use for recreation as a golf club.COMMENT: WE AGREE WITH THIS CONCLUSION SO FAR AS THE WHOLE GOLF COURSE IS CONCERNED. HOWEVER, THIS DEVELOPMENT OF THIS SMALL SITE WOULD HAVE NEGLIGIBLE IMPACT ON THE STRATEGIC GREEN NETWORK AND WOULD CLEARLY NOT RESULT IN SIGNIFICANT LOSS. MOREOVER, THE SITE COULD BE DEVELOPED IN SUCH A WAY THAT MAINTAINS IT MINOR VALUE AS A GREEN NETWORK.Would development of the site avoid identified areas of ‘medium-high flood risk’ (fluvial) or areas of importance for flood

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management?Partially – Approximately half of the site to the east is covered by an area of medium-high flood risk and an area of importance for flood management.COMMENT: AS EXPLAINED ABOVE, THERE WOULD BE NO DEVELOPMENT IN AREAS OF FLOOD RISK.Is the site suitable for development?No - The site is not suitable for development due to its landscape constraints and contribution to the strategic green network.COMMENT: WE AGREE WITH THIS CONCLUSION SO FAR AS THE WHOLE GOLF COURSE IS CONCERNED. HOWEVER, FOR ALL OF THE REASONS EXPLAINED ABOVE, THIS SMALL SITE FRONTING ON TO PEFFERMILL ROAD IS SUITABLE FOR RESIDENTIAL DEVELOPMENT.IN CONCLUSION OF THIS REPRESENTATION, THEREFORE, WE RECOMMEND THAT THE IDENTIFIED SITE IS ALLOCATED FOR RESIDENTIAL DEVELOPMENT IN CITYPLAN 2030.

Choice **12 C**

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

Short Response

Explanation

Choice **12 C**

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

Short Response

Explanation

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Choice **12 C**

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

Short Response

Explanation

Choice **12 D**

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

Short Response

Explanation

Choice **13 A**

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

Short Response

Explanation

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Choice **14 A**

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

Short Response

Explanation

Choice **14 B**

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

Short Response

Explanation

Choice **14 C**

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

Short Response

Explanation

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Choice 15 A

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

Short Response

Explanation

Choice 15 B

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

Short Response

Explanation

Choice 15 C

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

Short Response

Explanation



Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 15 D

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

Short Response

Explanation

Choice 15 E

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

Short Response

Explanation

Choice 15 G

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

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **16 A1**

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

Short Response

Explanation

Choice **16 A2**

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

Short Response

Explanation

Choice **16 A3**

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

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **16 A4**

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

Short Response

Explanation

Choice **16 A5**

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

Short Response

Explanation

Choice **16 A5**

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

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **16 B**

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

Short Response

Explanation

Choice **16 C**

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

Short Response

Explanation

Choice **16 E1**

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

Short Response

Explanation

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

Supporting Info

Email

Choice 16 E2

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

Short Response

Explanation

Choice 16 E3

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

Short Response

Explanation

Choice 16 E4

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

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 E5

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

Short Response

Explanation

Choice 16 E6

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

Short Response

Explanation

Choice 16 E7

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

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 16 E8

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

Short Response

Explanation

Choice 16 EX

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

Short Response

Explanation

Choice 16 F

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

Short Response

Explanation

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

Supporting Info   
Email

Choice **16 G**

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

Short Response

Explanation

Choice **16 H**

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

Short Response

Explanation



## Response ID ANON-KU2U-GWPH-W

Submitted to **Choices for City Plan 2030**

Submitted on **2020-04-29 12:35:10**

### Your information and data

#### 1 What is your name?

**Name:**

Holder Planning

#### 2 What is your email address?

**Email:**

robin@holderplanning.co.uk

#### 3. If you do not have an email address What is your address?

**Full address including postcode:**

#### 4 I am responding as

Agent / Consultant

#### 5 IF you are responding on behalf of an organisation or an other individual, what is their name?

**Agent on behalf of:**

Prestonfield Golf Club

#### 6 I agree to my response being published to this consultation.

Yes

### Choice 12 - Building our new homes and infrastructure

#### 12A Which option do you support?

Not Answered

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

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

**Support Greenfield - Support:**

**Support Greenfield - Object:**

**Explain why:**

Prestonfield Golf Club do not object to any of the housing allocations proposed in Choices 2030. However, as explained in other submissions by Holder Planning in response to Q12A of the submission form, the number of greenfield allocations proposed by all three strategy options is significantly less than needed to approach meeting Edinburgh's housing need and demand. In particular there is almost a complete absence of smaller housing sites proposed on greenfield land, which could make a contribution to the significant shortfall in housing provision in the short to medium term. Although the allocation of large strategic sites is to be welcomed, past experience is that such sites will have long lead-in times and will be dependent on significant infrastructure provision, which in many cases is not yet in place.

With that in mind, Prestonfield Golf Club are therefore seeking the allocation of a site for housing on the north side of Peffermill Road, opposite the Nairn Oatcakes factory. The site currently comprises two practice holes, which in the challenging financial circumstances the Club find themselves in, have been decided to be surplus to requirements (see below)

A plan of the site in question is submitted in response to Q12C of the online submission form. Although the total area of the two practice holes is approximately 1 hectare, the northern part of the site, comprising approximately 0.6 hectares is identified on the SEPA flood maps as a potential flood risk. The extent of the flood plain requires further detailed investigation in order to establish the remaining area of land available for housing development, but is likely to be approximately 0.4 hectares.

The developable area fronts onto Peffermill Road, with an existing vehicle access point from which a residential development could be served.

The site is currently subject to a number of designations in the Adopted Edinburgh Local Development Plan, which we consider in turn:

#### GREEN BELT

The site is a very small fragment of the wider Green Belt which permeates into the City. This zoning covers the whole of Prestonfield Golf Course but is separated from the Green Belt zoning to the south by Peffermill Road, which of course is a very urban feature, characterised locally by the Nairn Oatcakes Factory.

The Choices 2030 consultation has put forward the possibility of allocating large areas of existing Green Belt on the edge of the City for residential development. City Choices 2030 rightly recognises that one purpose of the Green Belt identified in Scottish Planning Policy is to guide required development to appropriate sustainable locations. The South East Scotland Strategic Development Plan (SESplan 1) recognises that the release of Green Belt land for housing development will be necessary if challenging housing targets are to be achieved. Policy 7 of SESplan 1 identifies the criteria that require to be met for a site to be allocated for housing in CityPlan 2030, as follows:

- a. The development will be in keeping with the character of the settlement and local area;
- b. The development will not undermine green belt objectives; and
- c. Any additional infrastructure required as a result of the development is either committed or to be funded by the developer.

Crucially, the removal of this site from the Green Belt and its development for housing will not undermine Green Belt objectives. The site is extremely well contained by surrounding trees (which are to be retained) and because of its small size, its development will have no discernible impact on the wider Green Belt. The fact that the site fronts onto a busy main road, opposite a factory building, obviously lends itself to development.

#### OPEN SPACE

The site is identified as open space because of its relationship to the golf course. The land comprises practice holes and is therefore not a necessary element of the facility. The Golf Club would have preferred to keep it in its current use but, for the financial reasons explained below, its non-essential function is expendable. The majority of the site will remain in use as open space, and it may even be possible that this is maintained as public open space for the benefit of local residents. At present there is very little public use of the area. The loss of private open space to development will be negligible in the context of the wider area.

#### AREA OF IMPORTANCE FOR FLOOD MANAGEMENT (northern part only)

As described above, it is only proposed to develop the area to the south which is not subject to flood risk.

#### LOCAL NATURE CONSERVATION SITE

The land is currently maintained as practice golf holes, and therefore the majority of the site has no particular nature conservation value. The site is surrounded by trees and other vegetation, which will serve as a wildlife corridor. Any development of the site will therefore retain and maintain this green network. We have included this surrounding green resource on the submitted plan, only to highlight the area that requires to be protected.

#### REASONS FOR PROPOSING HOUSING DEVELOPMENT

In response to Q12C of the submission form, we have provided a letter from Prestonfield Golf Club, explaining the reasons behind this proposal to zone the land in question for housing, the text of which is set out below:

"Prestonfield Golf Course has been part of the local landscape and community for 100 years now and the current Club are doing all they can to ensure that they will be around for the next 100 years. It will be no surprise to the City of Edinburgh Council that the economics of running a golf club is challenging like many other leisure activities. In an effort to provide stability and some sustainability to the golf club we are looking to maximise the use of our limited assets. The Club have increased the members subscriptions and raised two levies from the membership. Continuing to raise funds from our members is not a sustainable business plan as there will come a tipping point when increasing fees will result in the loss of members from the club rather than help the finances of the club.

The two practice holes included in this representation at Peffermill are not and have never been an integral part of the James Braid designed 18-hole golf course. So, the change of use of the Peffermill area of land would have no impact on our Golf Course and are in fact surplus to the Club's operations. The change of use of this area of land would enable the club to realise some funds from this surplus piece of ground which in turn will allow the Club to sustain its operations, remain part of the community, look forward as one of the leading local clubs to continue to develop our Junior Golf further and focus on moving the club to profitability without asking the current membership to continue to dig deep to pay more and more to keep the Golf Club operational, part of the local community and the landscape of our city.

In summary Prestonfield Golf Club Council who have done all they can in the last few years to keep the club functioning, really need an opportunity to develop a more strategic business plan for the sustainability of the Golf Club. The acceptance of this representation will give Prestonfield Golf Club such an opportunity."

The site is small part of the Prestonfield Golf Course Assessment Area contained in the City Choices Housing Study. Because that assessment deals with a much wider area than that being proposed for development, many of its findings are of insignificant relevance to the site in question,

In order to assist the Council, therefore, we have set out the conclusions of the Prestonfield Golf Course Assessment below, and provided a comments (in capital letters) on each of the conclusions in respect to the smaller site.

Does the site fit within an area identified as a strategic development area?

No – The site is not within an identified SDA.

COMMENT: THIS IS CORRECT BUT SESPLAN 1 POLICY 7 DOES SUPPORT THE ALLOCATION OF SITES IN THE LDP WHICH ARE OUTWITH AN SDA ON THE FOLLOWING CONDITIONS:

- A. THE DEVELOPMENT WILL BE IN KEEPING WITH THE CHARACTER OF THE SETTLEMENT AND LOCAL AREA;
- B. THE DEVELOPMENT WILL NOT UNDERMINE GREEN BELT OBJECTIVES; AND
- C. ANY ADDITIONAL INFRASTRUCTURE REQUIRED AS A RESULT OF THE DEVELOPMENT IS EITHER COMMITTED OR TO BE FUNDED BY THE DEVELOPER

AS EXPLAINED IN COMMENTS BELOW, ALL OF THESE CONDITIONS CAN BE MET. IT SHOULD ALSO BE NOTED THAT IN LDP 1, A NUMBER OF SITES OUTWITH AN SDA WERE ALLOCATED IN PREFERENCE TO SITES WITHIN AN SDA. EACH SITE SHOULD BE CONSIDERED ON ITS INDIVIDUAL

MERITS REGARDING THE CRITERIA IDENTIFIED IN SESPLAN POLICY 7, WHICH DOES NOT DISTINGUISH BETWEEN SITES WITHIN OR OUTWITH THE SDA IN TERMS OF ALLOCATION.

Does the site support travel by foot to identified convenience services?

Yes – The site is within walking distance of local convenience services.

COMMENT: AGREED

Does the site support travel by foot to identified employment clusters?

Yes – The site is within walking distance to employment clusters.

COMMENT - AGREED

Does the site have access to the wider cycle network?

Yes – The site has access to the wider cycle network.

COMMENT: AGREED

Can the site support active travel overall through appropriate intervention?

Yes – The site supports active travel overall. Limited points of walking access to the site and links to the Innocent Railway cycle path should be addressed through masterplanning.

COMMENT: AGREED

Does the site support travel by public transport through existing public transport network accessibility and capacity?

No – The site does not support travel by public transport based on existing or incrementally improved provision.

COMMENT: DISAGREE. WE PRESUME THE ABOVE CONCLUSION HAS BEEN REACHED BECAUSE THE ASSESSMENT CONSIDERS THE WHOLE OF THE GOLF COURSE AREA, SOME PARTS OD WHICH ARE NOT CLOSE TO PUBLIC TRANSPORT. HOWEVER, THE SMALL AREA OF LAND UNDER CONSIDERATION HERE IS IMMEDIATELY ADJACENT TO PEFFERMILL ROAD, WHICH IS A HIGH FREQUENCY BUS ROUTE

Is the site potentially served by an identified public transport intervention project which is deliverable in the plan period to serve and accommodate development?

Partially – The site has limited support for travel by public transport based on an identified major intervention deliverable within the plan period. This intervention would serve the wider south-east corridor of the city along Old Dalkeith Road and improve accessibility from this area.

COMMENT – AGREED. HOWEVER, THIS PARTICULAR SITE IS ALREADY SO WELL SERVED BY PUBLIC TRANSPORT, NO ADDITIONAL INTERVENTION WOULD BE REQUIRED.

Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?

No – The site does not have sufficient primary school infrastructure capacity.

COMMENT: DISAGREE. WE PRESUME THE ABOVE CONCLUSION HAS BEEN REACHED BECAUSE THE ASSESSMENT CONSIDERS THE WHOLE OF THE GOLF COURSE AREA AND THE VERY SUBSTANTIAL DEVELOPMENT THAT AREA COULD IN THEORY ACCOMMODATE. THE SITE IS QUESTION HAS A CAPACITY OF APPROXIMATELY 30 HOMES AND WOULD THEREFORE PRODUCE ONLY ABOUT 10 PRIMARY SCHOOL CHILDREN. THIS WOULD BE WITHIN THE CAPACITY OF THE LOCAL PRIMARY SCHOOL.

Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?

No – The site does not have sufficient secondary school infrastructure capacity.

COMMENT: DISAGREE. WE PRESUME THE ABOVE CONCLUSION HAS BEEN REACHED BECAUSE THE ASSESSMENT CONSIDERS THE WHOLE OF THE GOLF COURSE AREA AND THE VERY SUBSTANTIAL DEVELOPMENT THAT AREA COULD IN THEORY ACCOMMODATE. THE SITE IS QUESTION HAS A CAPACITY OF APPROXIMATELY 30 HOMES AND WOULD THEREFORE PRODUCE ONLY ABOUT 6 SECONDARY SCHOOL CHILDREN. THIS WOULD BE WITHIN THE CAPACITY OF THE LOCAL SECONDARY SCHOOL.

If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?

Partially – The site does not have sufficient community infrastructure capacity to support development but this can be addressed through the extension of Prestonfield Primary School, subject to a feasibility study, and the delivery of additional capacity through the expansion strategy of the new Castlebrae High School.

COMMENT: SEE ABOVE COMMENTS ON EDUCATION

Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?

No – No scope is identified here due to the number of landscape constraints on the site, and its contribution to the setting of the city adjacent to Holyrood Park.

COMMENT: WE AGREE WITH THIS CONCLUSION SO FAR AS THE WHOLE GOLF COURSE IS CONCERNED. HOWEVER, AS EXPLAINED ABOVE, THIS IS A SMALL, VERY WELL CONTAINED SITE, THE APPROPRIATE DEVELOPMENT OF WHICH WOULD HAVE NO SIGNIFICANT LANDSCAPE IMPACT ON THE SETTING OF THE CITY. THE PARTICULAR SITE IS ON THE OTHER SIDE OF THE GOLD COURSE FROM HOLYROOD PARK AND FRONTING ON TO PEFFERMILL ROAD, WHICH IS HEAVILY URBANISED ALREADY, ITS DEVELOPMENT IS QUITE APPROPRIATE IN BOTH A LOCAL AND CITY CONTEXT/

Would development of the site avoid significant loss of landscape■scale land identified as being of existing or potential value for the strategic green network?

No – The site is of value for the strategic green network, due to lying within an area identified as a green network opportunity in Edinburgh itself. The site designated as open space, currently contributes to the unbroken landscape scale multi-functional green network stretching from Midlothian to Holyrood Park and is in active use for recreation as a golf club.

COMMENT: WE AGREE WITH THIS CONCLUSION SO FAR AS THE WHOLE GOLF COURSE IS CONCERNED. HOWEVER, THIS DEVELOPMENT OF THIS SMALL SITE WOULD HAVE NEGLIGIBLE IMPACT ON THE STRATEGIC GREEN NETWORK AND WOULD CLEARLY NOT RESULT IN SIGNIFICANT LOSS. MOREOVER, THE SITE COULD BE DEVELOPED IN SUCH A WAY THAT MAINTAINS IT MINOR VALUE AS A GREEN NETWORK.

Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?  
Partially – Approximately half of the site to the east is covered by an area of medium-high flood risk and an area of importance for flood management.  
COMMENT: AS EXPLAINED ABOVE, THERE WOULD BE NO DEVELOPMENT IN AREAS OF FLOOD RISK.

Is the site suitable for development?

No - The site is not suitable for development due to its landscape constraints and contribution to the strategic green network.

COMMENT: WE AGREE WITH THIS CONCLUSION SO FAR AS THE WHOLE GOLF COURSE IS CONCERNED. HOWEVER, FOR ALL OF THE REASONS EXPLAINED ABOVE, THIS SMALL SITE FRONTING ON TO PEFFERMILL ROAD IS SUITABLE FOR RESIDENTIAL DEVELOPMENT.

IN CONCLUSION OF THIS REPRESENTATION, THEREFORE, WE RECOMMEND THAT THE IDENTIFIED SITE IS ALLOCATED FOR RESIDENTIAL DEVELOPMENT IN CITYPLAN 2030.

**12C Do you have a greenfield site you wish us to consider in the proposed Plan?**

**Greenfield file upload:**

Plan Prestonfield Golf Course Practice Holes - Area for Potential Housing.pdf was uploaded

**Greenfield file upload:**

Letter Prestonfield Golf Club.pdf was uploaded

**Greenfield file upload:**

No file was uploaded

**12D Do you have a brownfield site you wish us to consider in the proposed Plan?**

**Brownfield sites upload:**

No file was uploaded

TOTAL SITE AREA =  
9,363 m<sup>2</sup> / 2.31 acres

Approximate Area  
Within flood plain =  
6,096 m<sup>2</sup> / 1.50 acres

Approximate Line  
of Flood Plain

Approximate Area  
Out-with flood plain =  
3,267 m<sup>2</sup> / 0.81 acres

Existing Vehicular Access





Prestonfield Golf Club  
6 Priestfield Road  
Edinburgh EH16 5HS  
Tel: 0131 667 9665

Dear Sirs,

**Prestonfield Golf Club representation to the City of Edinburgh Local Development Plan Main Issue Report (MIR).**

As Prestonfield's Golf Club Council acting on behalf of the members of Prestonfield Golf Club we felt it is essential that we write a letter supporting this representation.

Prestonfield Golf Course has been part of the local landscape and community for 100 years now and the current council are doing all they can to ensure that the Golf Club will be around for the next 100 years. It will be no surprise to the City of Edinburgh Council that the economics of running a golf club is challenging like many other leisure activities. In an effort to provide stability and some sustainability to the golf club we are looking to maximise the use of our limited assets. The Council have increased the members subscriptions and raised two levies from the membership. Continuing to raise funds from our members is not a sustainable business plan as there will come a tipping point when increasing fees will result in the loss of members from the club rather than help the finances of the club.

The two practice holes included in this representation at Peffermill are not and have never been an integral part of the James Braid designed 18-hole golf course. So, the change of use of the Peffermill area of land would have no impact on our Golf Course and are in fact surplus to the Club's operations. The change of use of this area of land would enable the club to realise some funds from this surplus piece of ground which in turn will allow the Club to sustain its operations, remain part of the community, look forward as one of the leading local clubs to continue to develop our Junior Golf further and focus on moving the club to profitability without asking the current membership to continue to dig deep to pay more and more to keep the Golf Club operational, part of the local community and the landscape of our city.

In summary Prestonfield Golf Club Council who have done all they can in the last few years to keep the club functioning, really need an opportunity to develop a more strategic business plan for the sustainability of the Golf Club. The acceptance of this representation will give Prestonfield Golf Club such an opportunity.

We trust that you will take the above comments into consideration when deliberating over this representation and would be happy to provide additional information if you consider it necessary.

Yours Faithfully

Ian Cowan

A handwritten signature in black ink, appearing to read 'Ian Cowan', written in a cursive style.

Club Captain.