

Customer Ref: 00832 Response Ref: ANON-KU2U-GPUV-9
Name: John Wright
Response Type: Agent / Consultant
On behalf of: Rosebery Estate Partnership

Supporting Info:
Email: john.wright@struttandparker.com

Choice 1 A

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

Short Response: Yes

Explanation
We agree, in principle, with the aspiration to connect our places as part of a city-wide, regional, and national green network. However, we do not believe that it is appropriate for new development to deliver this in isolation. We would also appreciate clarity for landowners of the maintenance of this network, we believe it is the Councils responsibility. Parts of the desired improvements represent existing deficiencies in the network which are required anyway, and whilst it is appropriate that new development contributes towards delivering these connections, they should not carry the full cost. Similarly, by requiring the development/developer to deliver these, brings in possible ransom situations which could frustrate, and even prevent, development from happening. Therefore, proportionate contributions should be sought, but delivery (particularly off site) should be by the Council (utilising statutory powers, where required). Map 1 showing the existing active travel network is incorrect (at least in one location – CEC11 confirmed by the Core Path Plan) as it shows the River Almond Walkway as being complete between Kirkliston and Crammond, and it would be worth ensuring that the plan is correct. In a similar vein (in respect of the River Almond Walkway), there seems little point investing funds and delivering an active travel route within an area identified on the Proposals Map as being within a flood plain and an area identified for airport expansion. There may be other examples of this which would be worth checking before progressing the plan to adoption. It is critical that consultation with the affected landowners is undertaken prior to agreeing a route for new parts of the network to ensure that it doesn't prejudice their ongoing agricultural/sporting activities.

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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 We support this in principle however, it will not be possible for “all development” to deliver this, particularly for surface water (Blue Infrastructure) within the vicinity of Edinburgh Airport (no open water allowed). Therefore, further thought on the types, scales, and locations of development that this requirement is applicable to prior to progressing the plan towards adoption.

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 We support this aspiration in principle however prior agreement with the landowner is required, and there may be compensation necessary. If areas are to be identified on the plan for future water management, this will have an impact on the agricultural operations being undertaken and discussions with the landowner will be required prior to identifying areas, and to agree compensation for lost crops etc.

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 We support this, in principle, but require further detail to be able to comment further. These areas, if deemed poor quality or underutilised should first be considered for allotments/community growing areas before other uses.

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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 No issue with the aspiration, but further detail is required on the scale of development that this will be imposed on. This will only be achievable on very large sites (likely greenfield and there are not many identified in the plan) and there will be unintended impacts on the ability to achieve the density aspirations, and the numbers achievable on site. 5ha (12 acres) is very significant area, and we would support the continuation (in certain circumstances) of the 2ha requirement, but for this to be identified as a minimum to be provided at a certain scale, which is expected to be exceeded depending on the scale of development. It should be borne in mind (particularly considering Choice 1D) that it is not just the scale of the open space, but its usability and accessibility, that is the more important factor in this.

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 We support this in principle, however, if the Council are to be identifying/allocating specific sites for new allotments and food growing, it is critical that they first consider their own ownership (including under used Open Space) before considering other locations. It is also critical that there is prior agreement with the owner (failing which the allocation will fail the tests of effectiveness set out in SPP) of the land to ensure that they are prepared to release it for that use, otherwise, there will be constrained allocations in the plan from the point of adoption. Where this is required as part of an allocation, it should be borne in mind that Allotments form part of the Open Space to be delivered on site (SPP definition of "Open Space" is "Space within and on the edge of settlements comprising green infrastructure and/or civic areas such as squares, market places and other paved or hard landscaped areas with a civic function" and "Green Infrastructure" is defined as "Green features include parks, woodlands, trees, play spaces, allotments, community growing spaces, outdoor sports facilities, churchyards and cemeteries, swales, hedges, verges and gardens").

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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? - 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 We support this in principle, however, as with Allotments, if the Council are to be identifying specific sites for new Cemetery or green/woodland burials, they should consider the Councils ownership (including underused Open Space) prior to engaging in discussion to reach agreement with a landowner. This is critical before including a site in the plan to avoid allocations in the plan which fail the tests of effectiveness set out in SPP.

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 It is unclear from the detail provided what is going to change from the current arrangements where adoption (with long term maintenance provision) or factoring is required/provided by the developer.

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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 Design and Access Statements are a formal part of the process for certain scales of development (Major and National Development, or development within a World Heritage Site, a Conservation Area, Historic Gardens & Designed Landscapes, National Scenic Areas, the site of a Scheduled Ancient Monuments, the curtilage of an A Listed Building), and in certain locations, but are not required for all proposals. Requiring these for changes of use where there is no change to the external appearance, these buildings are present in the locality and should not need to re-justify their design for a simple change of use. Further detail is required prior to commenting further, but we would recommend maintaining the existing thresholds for triggering the requirement for a Design & Access Statement. These measures however implemented should only apply to applications submitted following adoption of the LDP and not before, or retrospectively to currently pending applications under determination.

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 We welcome the drive to maximise the efficient use of land, however, we suggest that minimum densities are replaced with requirements to demonstrate that development proposals offer the most efficient use of land taking into account site-specific technical considerations and local context. We support the work undertaken by Homes for Scotland, and their submission in respect of the Densities. These measures (as with all other new measures, policies, requirements in this LDP) however implemented should only apply to applications submitted/registered following adoption of the LDP and not before, or retrospectively applied to currently pending applications under determination.

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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 Cross referencing our response to Choice 1A - National Policy in terms of SPP and Designing Streets already require this, there is no need to duplicate or further complicate this issue by arriving at a further Policy requirement. These measures however implemented should only apply to applications submitted following adoption of the LDP and not before, or retrospectively to currently pending applications under determination.

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 Whilst we agree with the statement, the detail in the Choices Document raises question marks over whether the aspiration is achievable “without losing densities” particularly within the urban area and on brownfield development sites. Student Housing should be treated no differently to private and affordable housing, delivering the same amount of open space as mainstream housing. Along with the other aspirations outlined in the Choices Document, it is important that the Council look at all of these in the round to arrive at a view of how this will affect delivery of development, in terms of timing and numbers, and ensure that this is reflected in the programming of sites in the supply to ensure the required minimum 5 year supply is maintained at all times. It is possible that, when reflected in the programming, this prompts a need for additional sites to be identified to maintain that supply and to avoid departure applications in response to a failing land supply that increases uncertainty for communities and the Council.

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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 Current Building S

Explanation The Building Control function of the Council is there to implement the requirements of the Building Regulations and the Planning Process should not duplicate or stipulate the requirements to be achieved. This will add complexity in the determination of planning applications by requiring consultation with Building Control on the standard being achieved (which will require additional detail to be provided by the applicant, and considered by Officers), and will duplicate the specific role of the Building Control Officer.

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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: No

Explanation If the Council are to be preparing Place Briefs (although it is unclear what the difference is between a Place Brief and a LPP) for areas and sites within City Plan 2030, they will need to await the Examination Report before proceeding with these to be certain what areas and sites they are to be working on to avoid aborted work, wasted resources and raised community expectations. In order to prepare a Place Brief (or LPP) it is critical that relevant landowners and developers are involved in the process. At that stage in the process it is likely there will be insufficient information available to arrive at a consensus on a Place Brief that won't change when the detailed site specific studies are undertaken (which can have a bearing on the layout and developable areas) and a detailed layout prepared. Assuming these are prepared following adoption of the LDP, the Council (working with the relevant stakeholders) would prepare the Place Brief (say 12 months); then community consultation could be undertaken on proposed Planning Application (min 3 months); a planning application could be progressed (current timeframe for determining a Major App (including S75) being approx. 9 months (35 weeks being 2019 Q1 and Q2 stats amalgamated); with discharge of pre-commencement conditions (assuming Full Planning, PPP would be longer), obtaining Building Warrant and other necessary consents prior to commencement of development (say 18 months). Therefore, if this is the case and assuming the anticipated timeframes are correct, the lead in time to delivering anything on site (assuming a running start at adoption of the plan) would be approx. 42 months (3.5 years) meaning that this needs to be reflected in the programming of sites allocated in the plan to establish whether a minimum 5 year supply is maintained at all times. If this is the case, and this approach is followed, it would be justifiable to identify additional generosity to the supply, and identify in excess of the minimum 5 year requirement prior to adopting the Plan. It would also be helpful to have definitions provided as to what the various terms used in the consultation mean such as "Community Body" (particularly where there is no Community Council); "Community Ambitions" (is this a majority of the community, if so, how is the community defined, is there a vote held locally or is this simply the ambitions of the vocal minority?); "Community Infrastructure"; "Community Facilities"; "Community Services"; "Community Uses" all of which are terminology used in the Choices Document. The planning system is designed to provide certainty and it is important that we all know the terms being used, understand their meaning, and how they are to be consistently applied, to provide that certainty. It also needs to be borne in mind that Healthcare is centrally funded, in parts a private enterprise, and whilst opportunities for Healthcare can be identified within a development, we do not believe that it is for the developer to deliver this. Fife Council recently (Dec 19) confirmed in a Committee Report (19/00250/FULL) that "Concerns raised regarding health care services and provision are noted, however, this is not an issue that can be addressed by the planning system. The NHS operate a list system which allocates a certain number of registered patients per GP. If a GP has too many patients registered, then funding is available for a new GP as part of that practice's business case to expand services where required to meet additional demand. The funding of healthcare is an issue for central government and there is no policy or legal mechanism in place for the planning system to require a developer to remedy this situation". We do not understand why this situation would be any different in Edinburgh. It is critical that the relevant landowners and developers are necessary participants in this process. Considerably more detail is required on how these will work to be able to comment further at this stage.

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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

The Planning (Scotland) Act 2019 (new s15A) sets out the process (except for the further detail to be provided in Regulations) to be followed in relation to local place plans. Before preparing a local development plan, a planning authority are to publish “an invitation to local communities in their district to prepare local place plans in accordance with schedule 19” (s15A (a)). Was this invitation published prior to preparing the LDP? Alongside this published invitation, the local authority are to (s15A (b)) publish information on, “(i) the manner in which and date by which such local place plans are to be prepared in order to be taken in to account in the preparation of the local development plan”; and information on “(ii) the assistance available for local communities to prepare local place plans”. New Schedule 19 provides some of the detail (except for the further detail to be provided in Regulations) as to how these should be prepared. Whilst we don’t see how this would be possible in the absence of the Regulations, has this been done? If so, what are the dates by which these local place plans are expected to be in place by in order to be taken in to account in this local development plan? What support/resource has been offered and has this been accounted for in the Financial Assessment of the Plan? It was estimated in 2019 (Financial Memorandum) that a local place plan could cost in the region of £13,000 to prepare. This figure assumes that the planning authority’s role, including provision of information to communities, would not add any significant costs. Has the Council considered the number they anticipate being prepared and the associated resource implication and cost of these in the financial appraisal of the LDP process? Local place plans should have regard to the local development plan for the land, as well as the Scottish Government’s Strategic National Planning Framework (currently under review, not anticipated to receive Parliamentary approval until 2021 – Scot Gov website) which covers the whole of Scotland. As the Act does not indicate the content and scope of local place plans (to be prescribed by regulations), and at this stage in the process (assuming the relevant precursor steps haven’t been taken already), there seems little point in progressing/ability to progress these as they may fail to meet (when published) the requirements of a local place plan (and therefore unable to be submitted/registered (and in turn taken in to account in the local development plan process)) resulting in abortive costs to community groups little able to afford such costs. It is critical that communities are well informed about the constraints and opportunities of particular sites, and that the relevant landowners and developers are necessary participants in this process. Considerably more detail is required on how these will work to be able to comment further at this stage.

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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 Whilst we do not disagree with the thrust of this Choice, we understand that Healthcare provision is centrally funded, in parts private enterprises, and whilst opportunities for Healthcare provision can be identified within a development, or as an allocation, we do not believe that it is for the developer to deliver this (See our reference to Fife Council comments on this issue set out at 4a). It is essential that any contributions meet the tests of the Circular and are justifiable, reasonable and proportionate. In terms of the four transport corridors identified in the consultation, we believe that a fundamental arterial route in to Edinburgh (A90 from Fife) has been ignored in the consultation. There has been an increase in traffic approaching the City (due to Edinburgh displacing need and demand to Fife (and other Lothian authorities) in the last SDP/LDP, along with significant development, recent and proposed in this plan, at Kirkliston) and there are opportunities/proposals (such as a proposed Park & Ride at Craigiehall) which would fill an obvious gap in similar provision at nodes around the City (see Map 4).

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 Whilst we agree with this, we believe that clarity is required over the terms being used in the Consultation, consistency used in their application, and clarity over the responsibility for delivery of these features is required. Prior agreement with the landowner is also required to satisfy the tests of effectiveness set out in SPP to avoid constrained allocations in the plan, and potential unintended delays in delivering development, by not being able to bring forward the Community Facilities. It is also worth bearing in mind that some of these community facilities are already required, in part meet an existing deficiency, and therefore not wholly deliverable by contributions from new development.

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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 See our submission to 12B, we believe that there is an opportunity to achieve this at South Queensferry (Business and Tourism development) and at Maybury (small scale residential).
No response to 12 B, but 12 A; We support a Blended approach due to the need to deliver the urban/brownfield sites, however, it must be recognised that in doing so, a larger allowance for generosity is required due to the significant lead in times associated with delivering these sites, coupled with the question marks raised over the deliverability of these associated with some of the other Choices in the consultation, and the potential lead in times (where Place Briefs, Local Place Plans etc are involved). We believe that, as has been the approach in other Local Authorities (Midlothian for example), the Council should consider identifying “reserve” sites for delivery in the event of a failure in the land supply, these “reserve sites” could be the priority in the event of a failure in the land supply which would at least allow this to be met in a plan led manner, rather than a first come first served approach that currently exists. In terms of the housing numbers required, we support the position that Homes for Scotland have set out in their representations.

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 We don't disagree with this aim, subject to our comments elsewhere (at 5B) about the scope of these, the definitions (and consistency in use of them) used and clarity being provided on the responsibility for delivery.

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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 There are issues with the legality of this approach (Ref Elswick, and the recent Chief Planners Letter regarding the Edinburgh SG on Developer Contributions and Infrastructure) and whilst a cumulative approach may be beneficial to the Council in considering what improvements might be required in the area, significantly more information is required before this can be robustly considered as being appropriate and what forms of development contributions will be sought from.

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 We are unable to support this approach. Edinburgh Council has been applying their Developer Contributions Guidance (unadopted) for a number of years (and continue to do so, despite the Scottish Government resisting its adoption highlighting deficiencies which have not been addressed). When submitted to the Government for approval, the approval was not given, and the Guidance put to the side. This highlights the issues that the Development Industry, and Landowners, are wary of in respect of non-statutory guidance being used for critical issues such as this. If reduced to non-statutory guidance, there is no third-party consideration, and this cannot be allowed to happen with an element of the plan which can result in £m of contributions being paid to the Council. We need the confidence that this has been independently considered prior to adoption, and ONLY applied following adoption. It will not be possible to set out the precise amounts until the content of the plan is approved (otherwise, updates to the Contributions will be required prior to adopting the Plan to reflect changed allocations which could have a bearing on the amounts identified in the plan), therefore, we believe that the precise contributions should continue to be set out in Statutory Supplementary Guidance prepared following receipt of the Examination Reporters Report. We believe that there is also an issue with Action Programme also setting out costs and duplication/contradiction between the two documents. We do not believe that the Action Programme should contain anything other than the Actions required to deliver the plan, and the contributions should be contained in one document.

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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 This is a highly subjective approach to considering the acceptability of development and relies on a variety of very broad ranging assumptions and interpretation thereof. We do not believe that this approach delivers the certainty required by the Planning System. New development can trigger enhancements (not planned), and in some cases new development subsidises enhancements to public transport in their early years, which would not be taken in to account in this process.

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 The terms "Place Brief" and "Place Plan" are used in the Consultation, however, it is not clear what each does, and which is prepared first. If these are separate documents, prepared in sequence (which is what we understand would be the case), this will add to the resource required, and the timescale involved before development can proceed or sufficient certainty is available to be able to progress an application (see response at 4A). We do not believe that it is appropriate to identify in separate policy documents differing levels of parking provision and are of the view that these should still be dealt with in a separate piece of statutory supplementary guidance to provide the certainty required by the Planning System. Whilst we support the move towards public transport, this cannot be forced upon people, and in instances where minimum parking has been provided, problems have been experienced with people parking on verges/open space etc. It must be borne in mind that whilst the drive towards public transport is sensible, the current move is towards electric cars and therefore car ownership will remain prevalent and whilst the Council may decide to reduce their ability to park in the city or at their work, they should be able to park them at home.

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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 Aspirational targets are not an appropriate basis on which to base the parking levels applicable to the new homes in this plan. If the targeted trips are not converted into actual trips, then there will be an under provision of parking which will result in undesired consequences. The number of people who will walk, cycle or use public transport is dictated by personal choice and this cannot be targeted, it is dictated by the attractiveness and availability/reliability of the transport modes being encouraged. People should not be left in a position where they have no choice but to use public transport, walk or cycle if they don't want to, or it isn't convenient for, the trip that they are making.

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 We are of the view that restricting city centre car parking simply pushes this out to surrounding areas, with consequential adverse impacts.

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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 We don't believe that it is possible to control demand through policy, policy should be responding to and accommodating demand rather than attempting to control it. As outlined elsewhere there are issues associated with this approach which need to be considered in more detail. In the absence of the wider infrastructure being in place to support development in this way, only future proofing of sites should be provided at this stage.

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 Whilst we agree with this approach, the Map (Map 4) published alongside this question indicates (bottom right) that what is shown on the Map is "Potential Park & Ride Sites", but confuses new and existing provision (see also our response to 5A). When considering Map 4, it occurs to us that; • **H**ngliston P&R (shown on Map 4) is existing but potential to be extended; • **H**ermiston P&R (shown on Map 4) is existing but potential to be extended; • **S**traiton P&R (not shown on Map 4) is existing no change discussed; • **S**herrifhall P&R (not shown on Map 4) is existing, no change discussed; • **N**ewcraighall P&R (shown on Map 4) is existing but potential to be extended; • **G**ilmerton Rd (shown on Map 4) is potential new provision; • **P**asswade Rd (shown on Map 4) is potential new provision; There is an obvious gap in provision, when looking at the existing and proposed provision in the network, which is on the A90 at Craigiehall.

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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 However, at 8A it is indicated that the Council are to provide criteria, but at 8C people are asked to propose links, how is this possible if the criteria haven't been published. Clarity should be provided on the responsibility for funding, delivery and maintenance of these routes before commenting further.

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 We support the aspiration, however as indicated in various other responses to the consultation, clarity is required as to the responsibility for delivery of these routes, and the relevant landowners should be informed and consulted as part of the process of identifying these (some may require amendment to alignment to take account of existing farming, shooting etc activities).

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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

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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 The amount of student housing coming forward is in response to the demand, quite simply, if the developers didn't believe there would be occupiers, they wouldn't be progressing schemes. It would appear to us, from press coverage of student housing proposals, that residents don't appear to like student housing being pepper potted amongst open market housing due to the likelihood of students and the working population keeping very different hours. The presence of the student population within the open market housing stock is one factor which pushes rents/market values of property upwards and prices out the local resident population (Marchmont for example) and therefore accommodating students in specifically designed accommodation and maximising the delivery of that in close proximity to the universities would appear to have beneficial effects which would not be achieved through the approach being advocated here.

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 As outlined at 10A, a Policy such as this is likely to be too prescriptive and difficult to apply in a wide range of circumstances, and should have regard to surrounding character, rather than dictate a range of uses to be delivered. The result of applying a policy such as this could result in conflicting uses being accommodated on site. A site of 0.25ha is very small indeed to attempt to deliver this range of uses, and insisting on this type of approach to urban sites within close proximity to educational establishments, will only reduce the ability of those sites to meet the demand in close proximity to the establishment they serve. The reasoning behind the proposed restriction on studio flats to 10% max on site is not clear, student accommodation is largely studio flats (which can be used out with term time as holiday accommodation during the festival etc.). Also, the planning process cannot dictate the ownership of student housing, this would appear to be imposing a cartel/monopoly on the student market which is not appropriate.

Customer Ref: 00832 Response Ref: ANON-KU2U-GPUV-9
Name: John Wright
Response Type: Agent / Consultant
On behalf of: Rosebery Estate Partnership

Supporting Info:
Email: john.wright@struttandparker.com

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

Explanation It is not possible at this stage in plan preparation to stipulate a mix of housing types and tenures which will be delivered on sites, some of which (given the timescales set out in our other responses) may be delivered towards the end of the LDP Period (therefore in approx. 4-7 years' time). This is highly fluid and should only be determined by market conditions at the time the proposal is being consented. This point is confirmed by the changes of house type applications by housebuilders on sites under construction to reflect changing market conditions. The design guide should be produced in conjunction with the developer and not lead by the RSL. We do not support the representative mix as we work with the RSL to meet their needs which is 1, 2 and 3 bed properties regardless of what is being built on the private site. The further down side to a representative mix is that densities would reduce as land take would increase for the affordable element and as a result both private and affordable numbers would reduce overall. Housing for Varying Needs standards is a wide term and we would only support the broad principles of this as all criteria cannot be met.

Choice **12 A**

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

Short Response

Explanation We support a Blended approach due to the need to deliver the urban/brownfield sites, however, it must be recognised that in doing so, a larger allowance for generosity is required due to the significant lead in times associated with delivering these sites, coupled with the question marks raised over the deliverability of these associated with some of the other Choices in the consultation, and the potential lead in times (where Place Briefs, Local Place Plans etc are involved). We believe that, as has been the approach in other Local Authorities (Midlothian for example), the Council should consider identifying "reserve" sites for delivery in the event of a failure in the land supply, these "reserve sites" could be the priority in the event of a failure in the land supply which would at least allow this to be met in a plan led manner, rather than a first come first served approach that currently exists. In terms of the housing numbers required, we support the position that Homes for Scotland have set out in their representations.

Customer Ref:

00832

Response Ref:

ANON-KU2U-GPUV-9

Supporting Info

Name

John Wright

Email

john.wright@struttandparker.com

Response Type

Agent / Consultant

On behalf of:

Rosebery Estate Partnership

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

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

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

Supporting Info
Email

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

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

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

Supporting Info
Email

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

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

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

Supporting Info
Email

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

Choice **12 BX**

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

Short Response

Explanation

Choice **12 C**

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

Short Response

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **12 C**

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

Short Response

Explanation

Choice **12 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

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

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

Supporting Info
Email

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 In order to properly consider this choice, we would appreciate confirmation that either Edinburgh Airport is no longer expanding in the way that it has previously been anticipated to (prompting the need to relocate RHS and in turn safeguard this land for that purpose), or that the RHS will never relocate from its current site. This land was safeguarded for RHS relocation (as it is the most logical site for it to relocate to), and if that is no longer happening, then the designation of the land (as anticipated in the Choices document) for housing, needs to be considered in the same manner as every other greenfield greenbelt release with no regard to the previous designation being taken in to account (i.e. not as an allocated site being changed, but a new green belt release).

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 Whilst not aviation specialists, we do not understand how an international airport serving the capital city of a potentially independent country with aspirations to grow can operate efficiently without a cross wind runway.

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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:

00832

Response Ref:

ANON-KU2U-GPUV-9

Supporting Info

Name

John Wright

Email

john.wright@struttandparker.com

Response Type

Agent / Consultant

On behalf of:

Rosebery Estate Partnership

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

Not Answered

Explanation

Not Answered

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

Not Answered

Explanation

Not Answered

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:
Name
Response Type
On behalf of:

Supporting Info
Email

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:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 E8

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

Short Response

Explanation

Choice 16 EX

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

Short Response

Explanation

Choice 16 F

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

Short Response

Explanation

Customer Ref: 00832 Response Ref: ANON-KU2U-GPUV-9
Name: John Wright
Response Type: Agent / Consultant
On behalf of: Rosebery Estate Partnership

Supporting Info:
Email: john.wright@struttandparker.com

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:

Land at Bankhead Steading, South Queensferry

We are promoting the area of land (approx. 5.6ha) between the Forth Bridges Experience site and the existing Bankhead Steading Business site on the eastern edge of South Queensferry for a phased business (range of uses including a pub/restaurant, meeting/exhibition space, flexible events space, as well as class 4, 5 and 6 space) and tourism (holiday lodges and play area) development.

Working with WYG Architects we have prepared the attached concept/vision document drawing together the known constraints (pipelines, ridge, etc.) to show how the site might be developed in phases over time (please note, this is indicative only at this stage). The route of the pipeline (no HSE safeguards, simply a 3m standoff) severs the site, but allows for the tourism element to the north west closest to the settlement and attractions, and the business element to the south east of it building upon the current business space at Bankhead Steading (continuing the broad architectural form present).

The recently consented Forth Bridges Experience will be a significant boost to the already significant tourist interest in South Queensferry and we believe that providing an opportunity (in addition to the existing hotels (4 according to the Councils Commercial Needs Study)) to diversify the offering in South Queensferry. Being suitably different to avoid detracting from the existing hotels custom to provide accommodation in close proximity to the Train Station and the cycle/footpath network as well as within walking distance of the other attractions in South Queensferry would compliment this proposal, makes logical sense, and should be supported.

Indeed, one of the “Priority Activities” identified in the “Forth Bridges Area Tourism Strategy” is to “encourage local tourism businesses to grow and create employment opportunities through their proximity to the bridges” and this proposal is responding, in part, to that priority.

The Bankhead Steading business space has been a considerable success providing space for local business (established businesses and start ups), but also for small companies relocating from central Edinburgh. The existing business space has been operating for approximately 15-20 years now, and still retains their original anchor tenant, turnover rates are low, and vacancies limited which provides confidence that there is demand for this type of accommodation in the locality. The proposal is partly in response to enquiries which have been unable to satisfy due to the high occupancy rates.

The only Employment Land allocation at South Queensferry was at Ferrymuir, converted a number of years ago to housing (now complete), there are no other current or proposed employment allocations at Queensferry, and in line with the Spatial Strategy this satisfies an unmet demand and is within close proximity to non-car modes of transport, and would likely be taken up predominantly by local firms anyway. Unfortunately, there is no reference to Queensferry in either the Commercial Needs Study (Office, Industrial or Retail & Leisure) to support our assertion that there is a demand to be met.

We have had a review of the services available for the site and there is no practical or capacity constraint to delivering this proposal.

Whilst the site currently lies within the green belt, the area being promoted benefits from existing robust defensible boundaries and established landscape setting, and a detailed layout would be influenced by landscape and visual impact assessment to ensure development is accommodated within the landscape structure (which would be improved and enhanced through additional planting within the development). Community Consultation would similarly influence the precise mix, and features to be provided on site (we are aware of parking issues being experienced in Queensferry and whilst we are comfortable this proposal will not exacerbate those issues, it could provide some parking

for either the train station, or to mitigate parking issues on Hawes Brae if deemed appropriate through consultation).

The site is identified as Prime Quality Agricultural Land (PQAL) however, as this is a relatively minor part of an overall ownership, and would contribute to the Spatial Strategy, and meet local need (for which there is no other proposal, or location as well serviced by non car modes of transport) not addressed elsewhere in the plan, we believe that this minor loss should not prevent serious consideration of this proposal.

We have identified a contradiction within the Councils "Key Viewpoints" document in respect of key Viewpoint 6. We have sought clarification of this from the Council however, not had a response. The mapped location of the Viewpoint does not tie in with the view shown. The view shown is not possible to achieve from the mapped View point (shown at Station Road), rather the view shown (which is the view we believe is the one being protected) can only be achieved from Hawes Brae, therefore for the purposes of the Vision/Concept we have assumed that the mapped location of the Viewpoint is at Hawes Brae rather than at Station Road. It would be helpful nevertheless to receive clarification of this.



A Vision for Bankhead Steading, Dalmeny

Prepared on behalf of Rosebery Estates





Document Control

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Client: Rosebery Estates

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1. Introduction



This section will set out the key drivers behind the development and outline the purpose of the Vision Document.



1.1 Introduction

This document has been prepared on behalf of Rosebery Estates to set out a vision for the potential expansion of the existing Bankhead Steading development, with a range of mixed use proposals which will complement the recently approved Forth Bridge Experience project.

The document has been structured to firstly, describe the site's location and context; secondly, establish any opportunities and constraints to future development; and finally, to set out a vision for the landholding.

1.2 The Vision

Within the context of the existing Bankhead Steading development, and the recently approved Forth Bridge Experience visitor attraction, Rosebery Estates have identified an opportunity to complement these existing and emerging developments with a new mixed use development proposal.

The proposals aim to extend the existing steading development with new Class 4, 5 and 6 business accommodation arranged around a series of courtyard developments similar in scale and style to the existing steading. A range of mixed-use and visitor orientated facilities will also be introduced to complement the Forth Bridge Experience, including a pub / restaurant with internal meeting and exhibition space, visitor / holiday accommodation, and flexible events spaces and play areas.

Importantly, it is recognised that the site lies within the Edinburgh Green Belt and adjacent to a Special Landscape Area, an inventory Garden and Designed Landscape, Local Nature Conservation Site and the Dalmeny Conservation Area. A 'Key Viewpoint' relating to the Forth Bridge World Heritage Site has also been identified to the north of the landholding. As such, the landscape and visual context to the proposals have been carefully considered, with development designed to respect and enhance the landscape setting through the introduction of new woodland, tree belts, path and cycleway links and public open space..

Parking provision within the site will be subject to further consultation however, it is noted that there is potential to provide overflow car parking to alleviate existing parking pressure.

1.3 Key Opportunities



There is an opportunity to introduce new facilities and land uses which are complementary to the recently approved Forth Bridge Experience development, including self catering holiday accommodation such as cabins and wigwams, play areas and interior and exterior events / exhibition space.



The holiday cabins and/or wigwams could be set in an enclosed woodland setting, with a range of path and cycleway links offering direct links to nearby visitor destinations including the Forth Bridge Experience, Hawes Pier, the railway station and South Queensferry.



There are opportunities to expand the existing successful business development by extending the Bankhead Steading for Class 4, 5 and 6 business use.

Opportunity to create a pub/ restaurant with an indoor events space and meeting rooms.



The site benefits from a strong framework of tree belts and woodland along its edges however, these would be complemented by areas of native species based structure planting and tree belts. Once established, these would provide an additional sense of enclosure to the development and extended green corridors which connect to existing woodlands. They would also help to filter and obscure views towards the new development from the nearby roads and settlement.

This enhanced landscape structure would be complemented by a range of new path and cycleway links which tie into the existing Core Path, local path and cycleway network.





2. Site Appraisal & Context



This section provides an appraisal of the site and its immediate context, focusing on planning context, land use, landscape character, landform and access.



Figure 1
Site Location

2.1 Site Location & Context

The proposed development site is situated to the north-east of the village of Dalmeny, immediately abutting the settlement boundary. Dalmeny is located approximately 12km to the north-west of Edinburgh city centre and 1km to the east of the town of Queensferry.

The site lies within a predominantly rural, coastal setting with the Firth of Forth estuary directly to the north of the site and the iconic Forth Bridge being located approximately 200m to the north-west. The site is also approximately 150m to the north-east of Dalmeny train station and 1km to the north of the M90.

Planning Context

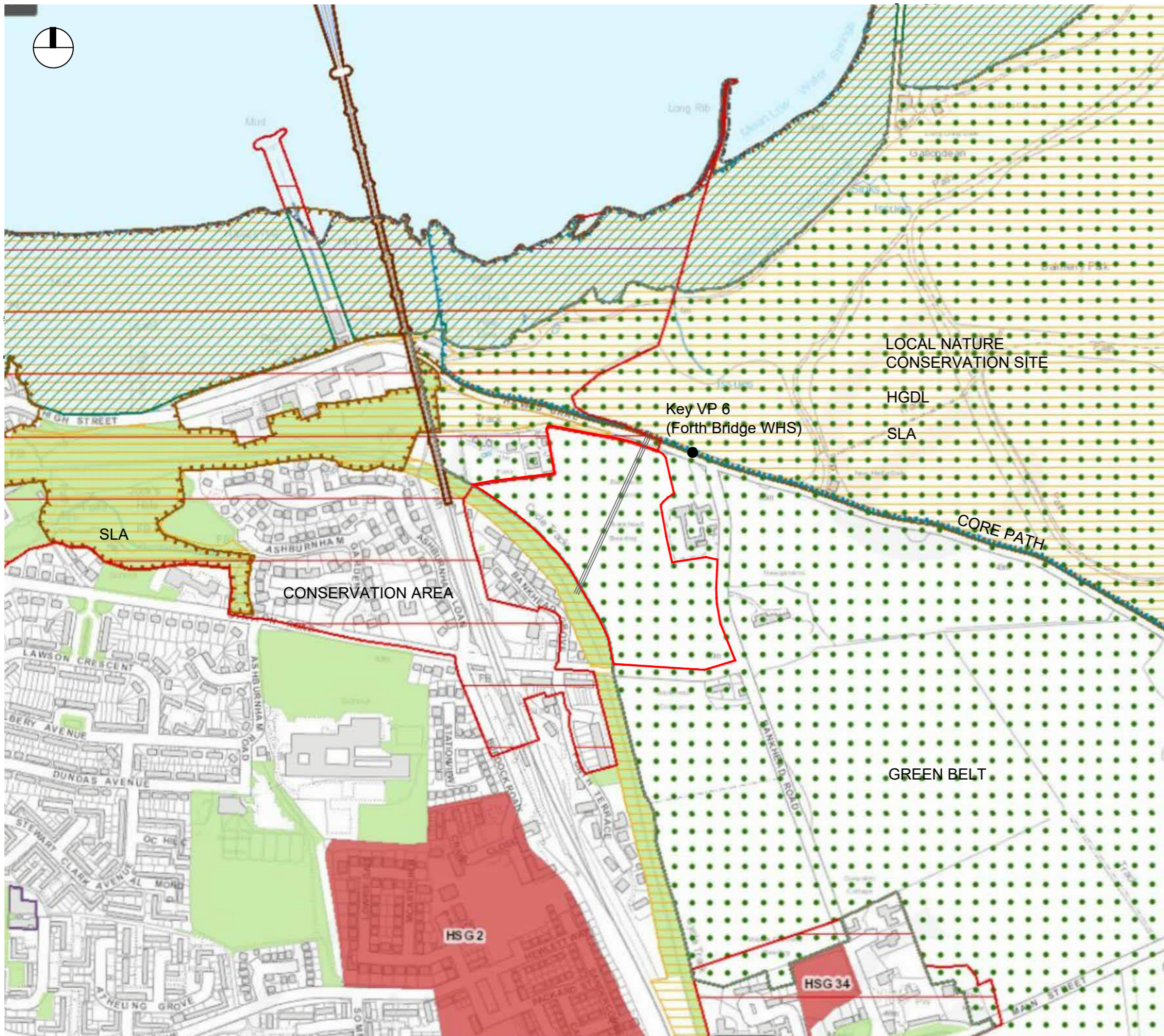
The site is located within the City of Edinburgh local authority area. The development plan for Edinburgh is the Edinburgh Local Development Plan (LDP) adopted in November 2016.

The site lies to the east of the Dalmeny settlement boundary within the Edinburgh Green Belt. The site is also situated to the east of the Queensferry Conservation Area and to the south and east of the Forth Coast Special Landscape Area. The site also lies to the south west of the Dalmeny Inventory Garden and Designed Landscape.

The site's planning policy context is illustrated on the adjacent Figure 1.



Figure 2
Planning Policy Context



Legend

-  Site Boundary
-  Green Belt
-  Open Public Space
-  Local Nature Conservation Site
-  Housing Site
-  Conservation Area
-  Forth Coast Special Landscape Area
-  Core Path

Note: Information is extracted from the City of Edinburgh Council Local Development Plan Interactive Map



Figure 3
Site Context

Legend

- Site Boundary
- Woodland
- Public open space / private land
- Agricultural land
- Sand
- Mud
- Water
- Buildings

2.2 Landscape of the Site

The proposed development site consists of an agricultural field (approximately 5.6 hectares) framed to the west by mature woodland belts and to the north by a narrow tree belt located along Hawes Brae. The southern boundary is framed by Station Road which is lined by mature specimen trees, and to the east by Bankhead Road and Bankhead Steading, which has been successfully converted to Class 4 business use.

The site falls gently from south to north, with a minor rolling ridgeline extending east-west across the southern sector of the site. There is also an oil pipeline and wayleave, which extends diagonally through the site, and has been considered as part of the designs.

Landscape Character

The SNH National Landscape Character Assessment (2019) identifies the site as being located within the 'Coastal Farmland - Lothians' Landscape Character Type (LCT 280). This landscape type is characterised by 'smooth, gently rolling and subtle with predominantly good quality, intensively managed arable farmland' with 'an even scatter of farm steadings, estates and cottages, with a limited number of other settlements'. It also notes that the landscape is characterised by the 'highly distinctive and differing designs of the three Forth bridges and their approaches' with there being 'extensive views northwards across the Firth of Forth and its bridges to the Ochil Hills and beyond, and to the south to the Bathgate Hills and Pentland Hills beyond' (page 1).



Figure 4
The Site



View looking south-west from Hawes Brae over the northern part of the site. The Bankhead Steading development is visible to the left of the view.



View looking north-east from the western site boundary. The Bankhead Steading development is visible beyond the intervening vegetation at the centre of the view.

Figure 5

Site Photos



View from within the central courtyard of the Bankhead Steading development.



View looking west from Bankhead Road towards Bankhead Steading development.

Figure 6

Site Photos

2.3 Visibility

The site lies in a relatively enclosed position, with tree belts located along the southern, western and northern boundaries providing a strong sense of containment. As such, views into the site are limited to near views from Station Road (to the south) and from Hawes Brae to the north. From Bankhead Road, views are often obscured by the roadside hedgerow and tree planting, and by the Bankhead Steading building group. Middle and longer distance views are generally restricted by the strong boundary vegetation described above.

It is also noted that within 'The Forth Bridge World Heritage Site: Key Viewpoints' document, prepared by the Forth Bridge World Heritage Management Group / Forth Bridges Forum (2016), a key viewpoint (Viewpoint 6) is identified near the proposed development site boundary.

Whilst the viewpoint location identified on page 17 of the document identifies the viewpoint location as lying near the junction of Station Road and Bankhead Road, with the associated view arc extending over the site, the actual viewpoint location described on page 18 and illustrated with a photo is located to the north of the site on Hawes Brae.

Whilst the importance of key views towards the Forth Bridge is acknowledged and respected, it is noted that the proposed development would be located to the south of this key viewpoint, with no resulting impact addition, it is also noted that the proposed building forms will be set back away from the northern edge of the site and Hawes Brae to reduce any potential visual impacts from views to the north.



Figure 7
Key Viewpoint Analysis

Legend

- A** Mapped location of 'Key Viewpoint 6' as set out within the 'Forth Bridge WHS: Key Viewpoints' (page 17)
- B** Actual location of 'Key Viewpoint 6' based on viewpoint photograph and view description (page 18)

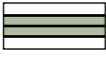








- B** View looking north west from Hawes Brae (B924). Assumed actual location of 'Key Viewpoint 6' based on viewpoint photograph and view description (page 18). From this location, more of the bridge is visible, particularly in winter months, and the view arc overlooks the Special Landscape Area (SLA), and Inventory Garden and Designed Landscape designations.

Figure 8

Site Analysis Plan

Legend

-  Approximate alignment of oil pipeline (3m wayleave)
-  Features providing a strong sense of containment
-  Features providing a limited / broken sense of containment
-  Existing entrances
-  Access roads adjacent to site
-  Footpath / Cycleway link (to NCR) along former railway line route
-  Forth Bridge Experience site





3. The Vision

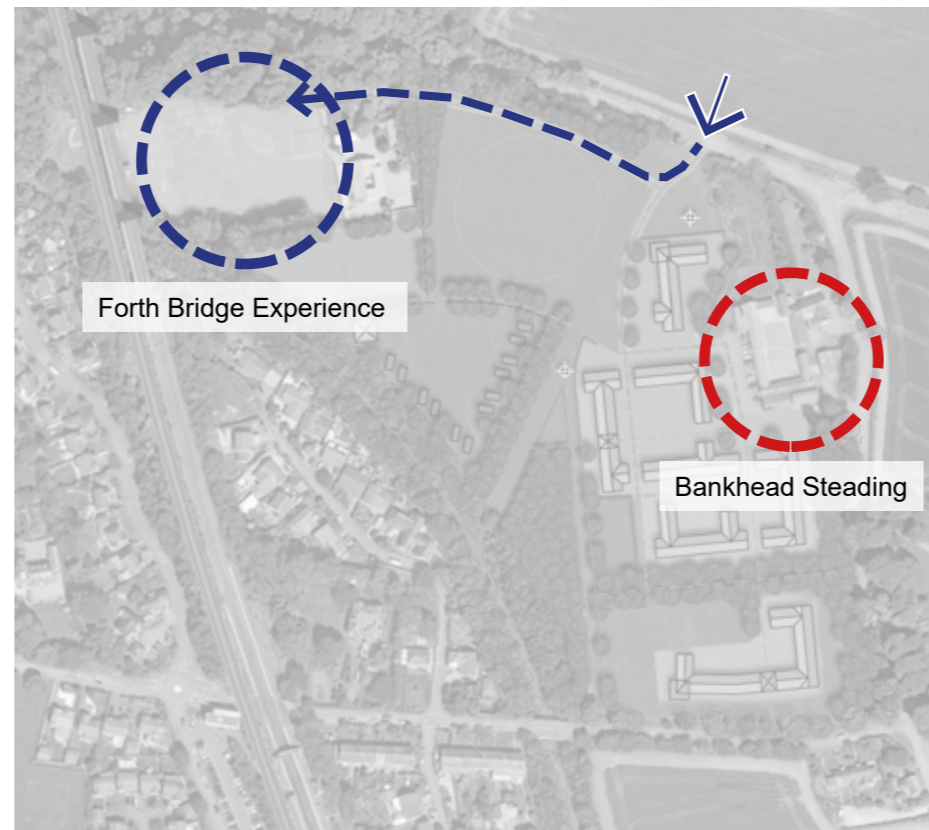


This section will set out the design concept and preliminary development framework proposals for the site.



3.1 Concept

The development proposals have been designed to respond to the existing and emerging development context, with a range of new complementary facilities and land uses set within an enhanced landscape framework of woodland tree belts and path links.

The following concept diagrams illustrate the key design drivers behind the proposals.



The proposals aim to build on the the existing and emerging development located next to the site. These are the existing Bankhead Steading development, which has successfully been converted into Class 4 business use, and the recently approved Forth Bridge Experience (FBE) development.

-  Forth Bridge Experience (FBE)
-  Bankhead Steading



Proposed uses are complementary to these developments, with holiday accommodation, camping, play and multi-use facilities all located near the FBE site, and expanded Class 4, 5 and 6 business development set around the existing steading.



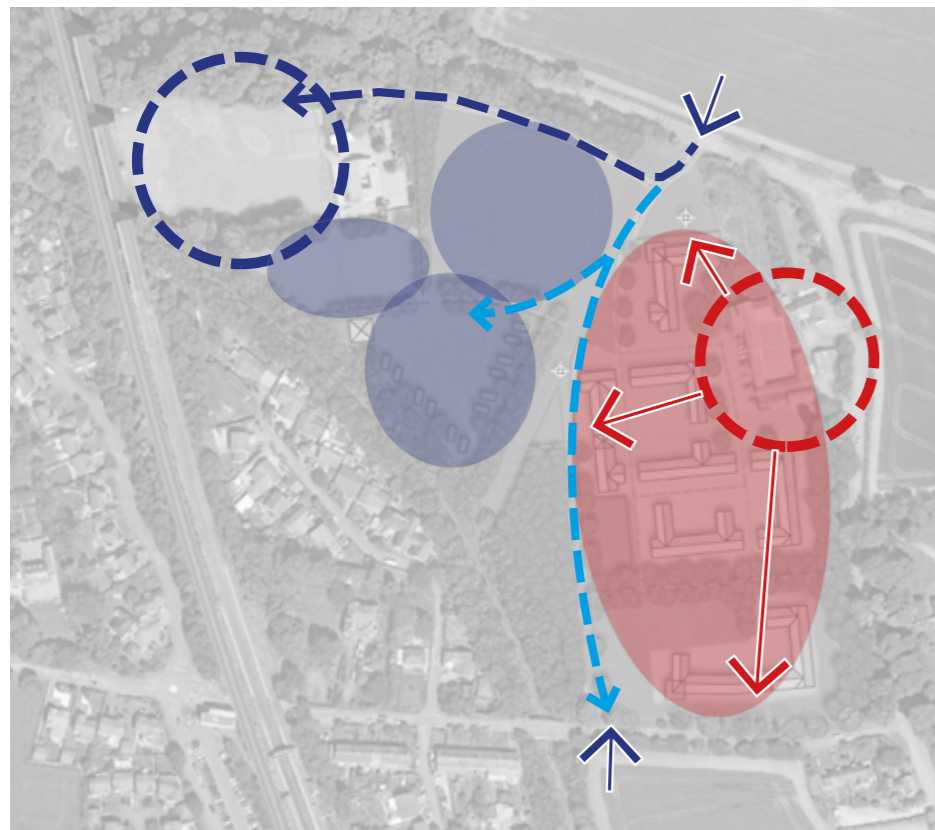
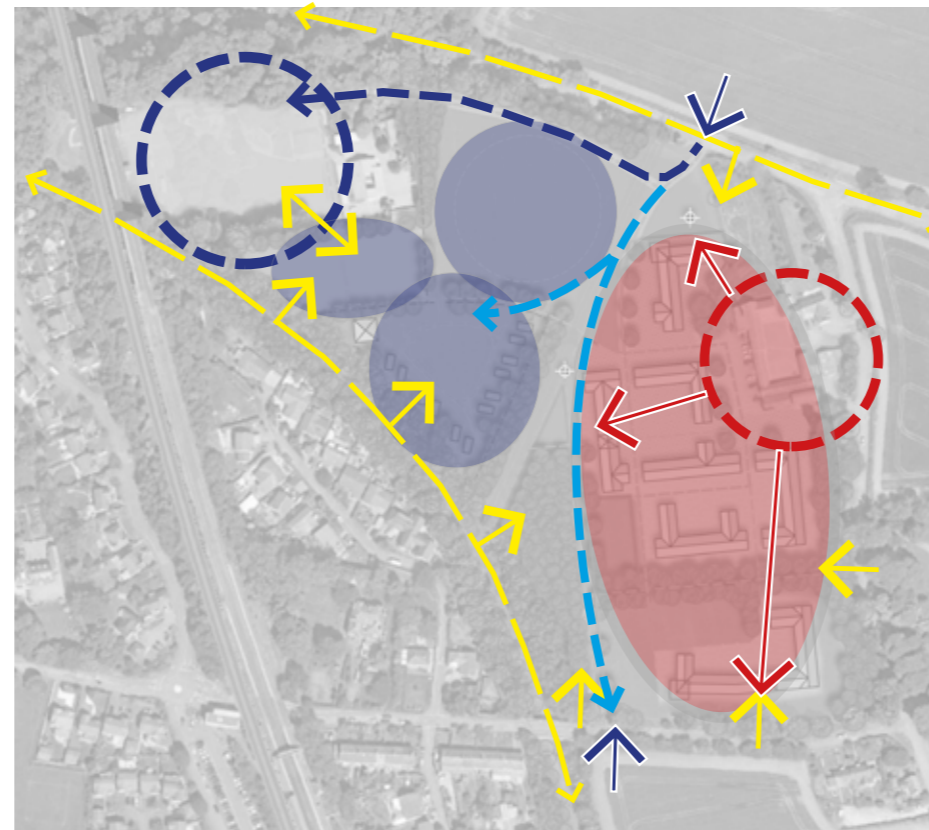
-  Proposed uses complementary to the FBE
-  Extended business use, inc potential for a pub / restaurant with events and meeting space

Figure 9
Concept Diagrams



Access into the proposed development will be via the upgraded junction onto Hawes Brae, with new access roads extending into the central part of the site, providing access to the new facilities. This will also offer an opportunity to form a second new vehicular access into the southern part of the site from Station Road.

- Approved access road to FBE
- Proposed vehicular access into the site
- Proposed vehicular access points



Importantly, the new development would be linked to the wider path, Core Path and cycleway network via a range of new path links. This will increase connectivity and allow direct access from the site to the station, the settlement edge, and the wider countryside setting.

- Existing Core Path / cycleway
- Proposed pedestrian / cycle links into the site from the existing active travel network



Whilst the site benefits from a strong landscape structure of enclosing tree belts and woodland, the proposals also include extensive areas of new structure planting designed to provide additional screening and to integrate the development into its setting.

- Proposed tree belts / woodland framing development and extending the existing landscape structure

3.2 The Vision

The landscape-led proposals aim to build on the existing and emerging developments located adjacent to the site through the introduction of a range of complementary facilities and land uses.

Following the redevelopment of the existing Bankhead Steading into class 4 business use, these proposals look to build on the success of this development through the introduction of new steading style buildings which reflect the existing scale, massing and architecture. In addition, the recently approved Forth Bridge Experience development located immediately to the north west will be complemented by new holiday accommodation, play areas events space and multi-use, flexible spaces.

In addition, the site benefits from a strong landscape setting of mature woodland and tree belts, so the proposals have been carefully designed to respect and enhance this setting. New native species based woodland areas and tree belts are proposed around the edges of the site, and within its southern sector. Once established, these will help to mitigate views towards the new development and provide an additional sense of enclosure.








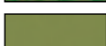

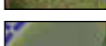
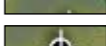

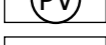

This will be complemented by a range of new path and cycleway links which will tie into the existing active travel network of Core Path's, local paths and cycleways. This will provide access to the nearby railway station and settlement edge, and to the wider countryside setting.

Parking provision within the site will be subject to further consultation however, it is noted that there is potential to provide overflow car parking to alleviate existing parking pressure.

- ① Access into the site will be via Station Road, to the south, and the upgraded access junction to the Forth Bridge Experience site off Hawes Brae.
- ② Potential location for a pub / restaurant / events building, with flexible meeting and exhibition space.
- ③ The existing Bankhead Steading development will be retained as it currently exists, with extended development designed to complement the existing character. The existing vehicular access onto Bankhead Road could be retained as a secondary / emergency access.
- ④ Extended steading development (Class 4, 5 and 6 business use) designed to complement the scale, massing and character of the existing development.
- ⑤ Large courtyard / events space within extended steading. Potential uses include beer festival, arts / performance area / seasonal market.
- ⑥ The southern edge of the extended Bankhead Steading development could present positively towards Station Road, acting as a 'gateway' building to the settlement edge. The existing mature trees located along Station Road would be retained and protected.
- ⑦ Potential location for holiday accommodation such as self catering cabins and/or wigwams etc.
- ⑧ Multi-use events space.
- ⑨ New native species based structure planting and tree belts will be located around the site. Once established, these will provide an additional sense of enclosure to the new development; will filter and obscure views from the nearby road networks; will help to break up the extent of visible development; and, will create a series of green corridors which will complement the existing landscape structure.
- ⑩ New path links into the existing Core Path, National Cycle Route link and local path network. This will provide active travel links to the railway station and into the edge of Dalmeny and South Queensferry.
- ⑪ Potential location for a semi-private garden for use by local business employees. This could be used for lunchtime recreation and informal meetings.
- ⑫ The existing oil pipeline route and its associated wayleave has been incorporated into the design, with proposed uses set back to the east and west of the route.



Figure 10
Illustrative Masterplan

- Legend**
-  Proposed pub / restaurant
 -  Proposed commercial (Class4) development
 -  Public realm
 -  Vehicular access points
 -  Internal road network
 -  Paths / cycleways
 -  Proposed woodland / trees
 -  Public open space
 -  Meadow
 -  Potential SUDS location
 -  Landscape feature / public art
 -  'Key viewpoint 6' location
 -  Approximate alignment of oil pipeline (3m wayleave)
 -  Illustrative Masterplan reference notes (see adjacent page)



Land at Lennie Cottages, Maybury

We support the continuation of the Maybury allocation to the new LDP. Significant progress has been made agreeing its servicing (with capacity) to the edge of the site as part of the adjacent development. We are aware that progress has been made in bringing forward the eastern elements of the allocation and we are on track to deliver this part at the appropriate time once progress has been made on the adjacent land.

However, we would seek one very minor modification to this allocation (or alternatively a new small scale allocation – Reporters at Examination have allocated sites as small as 12 homes, therefore we do not see why this cannot be done here) to the Maybury Allocation which would be the gap site at Lennie Cottages (see attached plan).

In Green Belt terms, this small area of unused scrub land provides very little in terms of setting for the city, does not prevent coalescence (nor would its loss result in coalescence), and provides no access to recreation or open space (nor will it). As part of the wider development in the area, the wider context and setting of the city has fundamentally changed. We have secured the servicing of this land with capacity (for up to 15 homes) and as a result of the wider development the site will be within an area of infrastructure capacity (with bus stops within easy walking distance) which ties in with and supports the spatial strategy.

There are no constraints whatsoever to delivery of housing on this site, and having previously promoted this land through the LDP (and been advised to bring this forward through the Development Management process), we would request that serious consideration be given to removing this land from the Green Belt and allocating it for housing. Progressing a site of this size in the green belt through the Development Management process is very risky indeed (requiring a failure in the land supply to justify housing, relying on an Officer, and possibly Members, agreeing a departure from Policy to secure consent, and then potentially receiving a decision that the numbers are too small to rectify the shortfall with a right of appeal likely to the Local Review Body) and costly. On the back of an allocation, the landowner has far more confidence to invest the funds necessary to bring this forward through the Development Management process given the reduction in risk provided by the allocation.

This is a very deliverable site, if removed from the Green Belt, and could deliver housing numbers very quickly if allocated and should receive your support.

Land at Craigs Road, Turnhouse - Site Plan

