

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **1 A**

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

Short Response

Explanation

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

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

Supporting Info
Email

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 We agree with the principle that poor quality or underused open space could be considered appropriate for development. More detail is required on whether the Council intend to set this out in an emerging City Plan 2030 policy or a form of guidance, and on what specific criteria will be suggested.

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

Customer Ref:

01705

Response Ref:

ANON-KU2U-GPH3-S

Supporting Info

Name

Iain Hynd

Email

Iain.hynd@bartonwillmore.co.uk

Response Type

Agent / Consultant

On behalf of:

Spire Healthcare Ltd.

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

Not Answered

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

No

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

Not Answered

Explanation

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

Supporting Info
Email

Choice 1 H

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

Short Response

Explanation

Choice 2 A

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

Short Response

Explanation We would support these measures, particularly the need to identify and support allocations for sites / land which will deliver additional specialist housing / housing for the elderly / housing for varying needs. Suitable sites like our proposal at land to the south of Spire Murrayfield Hospital should be given allocations for this sort of specialist housing in City Plan 2030.

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

Supporting Info
Email

Choice **2 B**

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

Short Response

Explanation

Choice **2 C**

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

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

Supporting Info
Email

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

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

Supporting Info
Email

Choice 8 C

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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 We consider that specific allocations should be made to encourage tenures such as housing for the elderly, or specialist housing, to be delivered on appropriate sites in suitable locations close to public transport and services. This should include sites like our proposal at land to the south of Spire Murrayfield Hospital.

Choice 12 A

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

Short Response

Explanation We support the City Plan 2030 to follow a blended approach towards delivering its housing needs. Specifically, we support the release of appropriate parts of the urban greenbelt to deliver private housing and housing for other tenures (such as housing for the elderly and specialist housing) in city locations that are close to public transport and services.

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

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **12 B2**

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

Short Response

Explanation

Choice **12 B3**

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

Short Response

Explanation

Choice **12 B4**

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

Short Response

Explanation

Customer Ref: 01705 Response Ref: ANON-KU2U-GPH3-S

Supporting Info

Name Iain Hynd

Email Iain.hynd@bartonwillmore.co.uk

Response Type Agent / Consultant

On behalf of: Spire Healthcare Ltd.

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 Not Answered

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 Not Answered

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 Not Answered

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **12 B8**

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

Short Response

Explanation

Choice **12 B9**

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

Short Response

Explanation

Choice **12 B10**

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

Short Response

Explanation

Customer Ref:

01705

Response Ref:

ANON-KU2U-GPH3-S

Supporting Info

Name

Iain Hynd

Email

Iain.hynd@bartonwillmore.co.uk

Response Type

Agent / Consultant

On behalf of:

Spire Healthcare Ltd.

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

Choice

12 C

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

Short Response

Yes

Explanation

Choice

12 C

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

Short Response

No

Explanation

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 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

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

Supporting Info
Email

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

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:

Name

Response Type

On behalf of:

Supporting Info

Email

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: 01705 Response Ref: ANON-KU2U-GPH3-S
Name: Iain Hynd
Response Type: Agent / Consultant
On behalf of: Spire Healthcare Ltd.

Supporting Info:
Email: Iain.hynd@bartonwillmore.co.uk

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: Not Answered

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: Not Answered

Explanation: Not Answered

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: Not Answered

Explanation: Not Answered

Customer Ref: 01705 Response Ref: ANON-KU2U-GPH3-S

Supporting Info

Name Iain Hynd

Email Iain.hynd@bartonwillmore.co.uk

Response Type Agent / Consultant

On behalf of: Spire Healthcare Ltd.

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 Not Answered

Explanation Not Answered

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 Not Answered

Explanation Not Answered

LAND TO THE SOUTH OF
**SPIRE MURRAYFIELD
HOSPITAL, EDINBURGH**

REPRESENTATION TO
CHOICES FOR EDINBURGH'S CITY PLAN 2030

APRIL 2020

CONTENTS

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1. INTRODUCTION

This short document has been prepared by Barton Willmore, on behalf of Spire Healthcare Ltd ('Spire'), to support their representation to the City of Edinburgh Council's ('CEC') consultation to the Choices For City Plan 2030, which is effectively the Main Issues Report for CEC's emerging Local Development Plan ('City Plan 2030').

This representation document relates specifically to a site being promoted in relation to land to the south of the existing Spire Murrayfield Hospital, Edinburgh ('the site'). It has been provided to support Spire's responses to City Plan 2030 'Choice 11 - Delivering more affordable homes' and 'Choice 12 - Building our new homes and infrastructure'.

Spire's proposal to the Choices for City Plan 2030 is that the proposed site (see Figure 1 for its red line boundary) be released from its present status as 'urban' green belt land and be allocated for either a care home / housing for the elderly / specialist housing or for general residential development on the western part of the site with the remainder to the south of Beechwood House to be designated as protected open space (see Figure 4).

Accordingly, Spire supports the removal of the site from the green belt under either the Choices for City Plan 2030 Housing Option 2 (Greenfield Release) or Option 3 (Blended Approach). Spire object to Housing Option 1 (urban Area) being selected as CEC's preferred approach for City Plan 2030.

Spire will welcome any opportunity to discuss the site with CEC and to provide any supporting studies or information that may be required to facilitate any potential allocation of the site for housing and open space in the emerging City Plan 2030.



FIGURE 1: SITE LOCATION

2. THE SITE

The site is located in north western Edinburgh at 122 Corstorphine Road, on land to the south of the Spire Murrayfield Hospital ('Murrayfield Hospital') and adjacent to Edinburgh Zoo and the Holiday Inn to the west. Please refer to Figure 1.

The site is generally rectangular in shape and extends to 3.18ha in size. It currently comprises of open grassland to the south of a parking area (for Murrayfield Hospital) and Beechwood House (a Category A listed building which forms part of the hospital complex). It also features woodland areas along its southern and western edges.

The site slopes downwards from north to south, with the site graded at some point in its past to have a generally level area in the middle section of the site. At the woodland on the southern edge of the site the topography slopes steeply down to Corstorphine Road.

The site is currently designated within the adopted Edinburgh Local Development Plan (2016) as Green Belt and is, therefore, outwith the defined urban area of Edinburgh. It is also designated as Open Space and as part of the Special Landscape Area for Corstorphine Hill.

Access to the site can be achieved via Corstorphine Road and the existing access road to the Murrayfield Hospital, although the site is not visible from Corstorphine Road due to the existing woodland. Access to public transport is offered by bus stops on Corstorphine Road, with three sets of bus stops located within 400m of the site. One of these also serves Edinburgh Zoo and so they are served by a large number of bus services, providing linkages throughout the City, to the airport and beyond.

In terms of the surrounding area, the buildings and parking of the operational Murrayfield Hospital lie to the north of the site. This includes the Category A listed Beechwood House and the more modern hospital buildings. The operation of the hospital will not be adversely affected by development of any part of the site.

The residential dwelling at 112-144 Corstorphine Road, which is located on the eastern side of the hospital's access road and close to the junction which Corstorphine Road, forms part of the Beechwood House Category A listing. The park and Local Nature Conservation Site of Corstorphine Hill lie further beyond to the east.

To the south of the site, beyond Corstorphine Road, lie a mixture of residential and commercial uses, with Manor Grange Care Home and Carrick Knowe Golf Course further to the south. A Holiday Inn, circa 6-7 storeys in height, lies to the west of the site with the grounds of Edinburgh Zoo to the north west.



3. THE PROPOSAL

Choice 12 - Building Our New Homes and Infrastructure

Spire recognise that CEC are requiring to take ambitious measures in order to deliver sufficient land that it requires to deliver the affordable housing that the residents of Edinburgh require up to 2030. It is also noted that the Council's preferred approach (Housing Option 1) is for all the housing land to be provided on land already within the urban boundary of Edinburgh, with housing to be delivered by CEC and its partners.

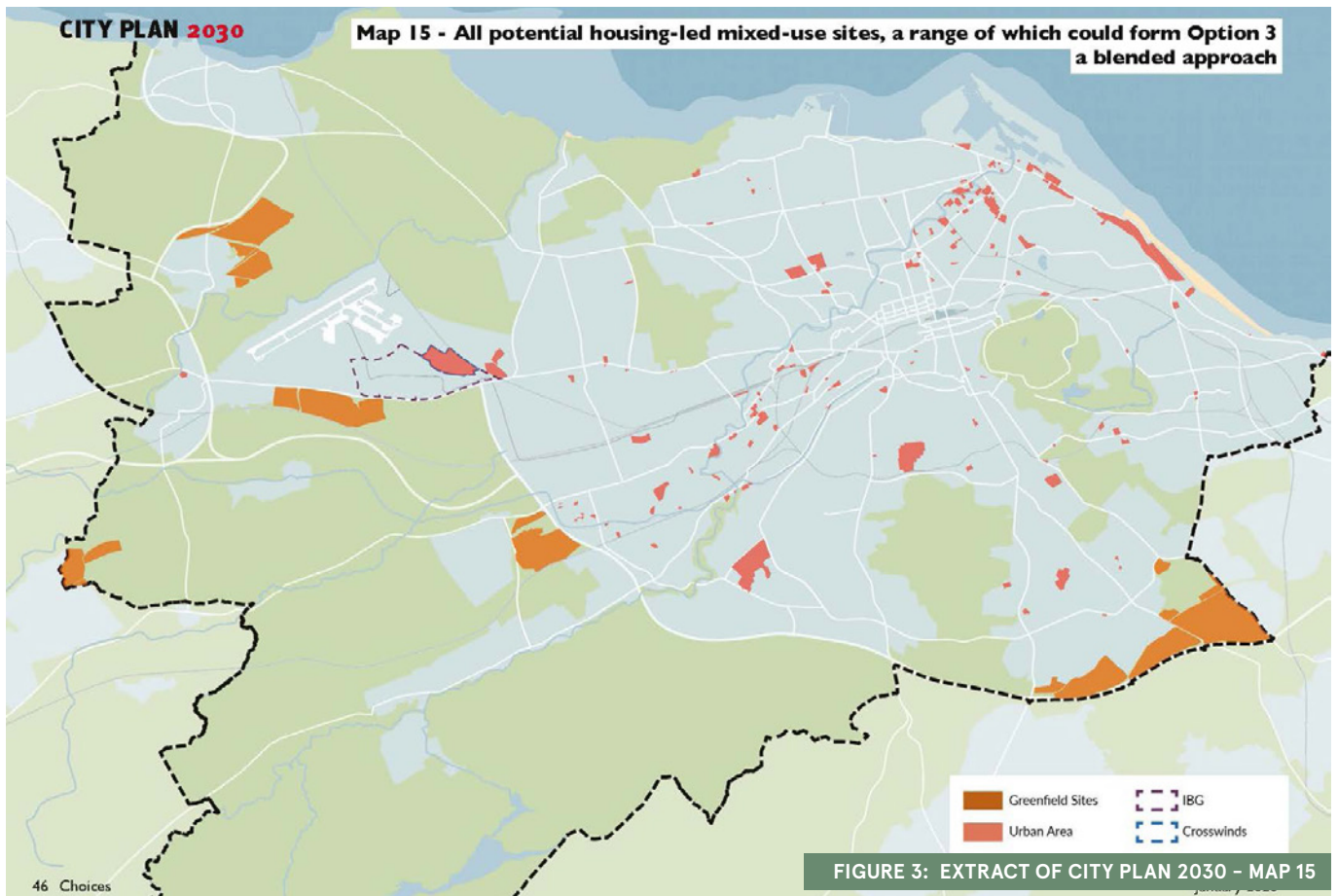
Spire wish to object to Housing Option 1 as being the preferred approach on the basis that it would:

- Miss the opportunity of allocating suitable green belt release sites that are well connected to public transport and services;

- Risk a housing shortfall (particularly for affordable housing) due to the uncertainty of requiring complicated compulsory purchase requirements and reliance on resolving constrained brownfield sites; and
- Fail to enable suitable, under-utilised sites in Edinburgh's urban green belt area to contribute to the sought increases in density within the City.

Spire support that the emerging City Plan 2030 follows either Housing Option 2 (Greenfield Release) or Option 3 (Blended Approach).

Spire wish to promote an additional green field / green belt release site which is not currently indicated on the broad Choices for City Plan 2030 maps for Options 2 and 3.



Specifically, Spire propose that land to the south of Murrayfield Hospital be released from the green belt, included within the urban area of Edinburgh and allocated for a form of residential development with an area retained for open space. Spire would accept this being for a care home development or housing for the elderly / specialist housing. It would also support a more flexible allocation that could include market and affordable housing.

In order to ensure that development of the site would avoid having any significant adverse impact on the setting and views to and from the Category A listed Beechwood House, our proposal is for development to be located only at the western part of the site, with the remainder designated as protected open space. This will also retain open space for both the development and the hospital, Please refer to Figure 4.

The developable area indicated in Figure 4 would provide an area of 0.65ha for a care home or form of residential development. An area of 1.54ha would be retained as open space with the remainder being the existing woodland and an area for access. This could provide between 20 -30 homes or a three to four storey care home of circa 50 - 70 beds. Development can be provided without the need to remove any mature trees.

It is considered that suitable access can be provided in the southern part of the site, just north of the existing woodland. Potential visibility of this access road from Beechwood House can be mitigated through structure planting to the north of the road and potentially by also lowering the level of the road itself if required.

Further consideration of the proposal is provided in the following sections.



FIGURE 4: PROPOSAL TO CITY PLAN 2030

4. PLANNING CONTEXT & JUSTIFICATION

Planning Context

As highlighted previously, the site is identified within the adopted Edinburgh Local Development Plan (LDP) as within the green belt, within a Special Landscape Area for Corstorphine Hill and designated for open space.

There is no planning application history of relevance relating to the site.

Representations were made to the preparation stages and Examination of the now adopted LDP for a larger site that sought for the whole Murrayfield Hospital site to be removed from the green belt and the Special Landscape Area, have the designation for open space removed and be identified as within the urban area of Edinburgh.

Ultimately, these representations for the grounds of Murrayfield Hospital were not accepted at the time. It was felt that the area of greenspace in the site made an important contribution to the character and identity of the city of Edinburgh, contributes to the setting of the listed Beechwood House and has a function in maintaining the setting and landscape character of Corstorphine Hill.

City Plan 2030 Housing Background Paper Site Assessment

Spire recognise that land at Murrayfield Hospital has been assessed in the Housing Study (January 2020) background paper to City Plan 2030. It is understood that this looked at the whole Murrayfield Hospital site. This recognised the strengths of the site as including that it is in walking distance to local shops and services, has sufficient secondary school capacity and avoids area of flood risk.

However, concerns were raised over the distance on foot to employment clusters, the lack of primary school capacity, impact on landscape character and on the majority of the site being considered as of value to the strategic green network.

Overall, the potential for a limited scope of development to be introduced in the landscape setting of the site is recognised but ultimately the site was not supported “due to its prominent landscape and value for the strategic green network.”

City Plan 2030 Landscape Background Paper Site Assessment

The site has also been assessed in another background paper to the City Plan 2030, the Landscape and Visual Assessment of Greenfield Sites (April 2019). This identifies scope for some development at the Murrayfield Hospital site, although it is “very limited scope for minimal low-rise development”.

This paper identifies that this potential for development should only associated with more recent development located on lower slopes to the north west of the Category A listed Beechwood House, in order to minimise effects on its setting. It adds that all mature trees should be retained to conserve the parkland character of the area and maintain wooded views to Corstorphine Hill from parts of the City.

Justification for Allocation within City Plan 2030

Response to the Background Paper's Site Assessments

The Housing and Landscape and Visual Assessment background papers of City Plan 2030 appear to have assessed the development potential of the overall Murrayfield Hospital site, although it is recognised that this will have included the site now being promoted by Spire.

The specific boundaries and identification of developable areas and open space areas, as defined in Figure 4, has been carefully set to respond to and mitigate potential concerns over impact on landscape character, the green network and the setting of the listed Beechwood House. As such, it enables a well connected and sustainable site to be developed to provide new residential development to help meet the City's needs, be it as a care home, housing for the elderly / specialist housing or a mixture of private and affordable market housing.

Allocation for a care home or for specialist housing for the elderly would avoid concern noted on whether there was sufficient scales of development within the area to address primary school capacity concerns. It would also site the elderly or infirm in a well connected location that is close to local shops, services and public transport connections.

Use of the site for houses for the elderly or care home will also negate concern over active travel connections to major employment areas. The site is close to active lifestyle options such as walking route, the green network at Corstorphine Hill and beyond, nearby cycle connections and local golf courses.

However, Spire believe that the above considerations are not insurmountable at the site such that would prevent private and affordable housing being delivered on the site, if preferred by the Council.

The proposed developable area on the site is under-utilised open space that can be considered acceptable for a well designed development of an appropriate scale.

It is considered to be highly marketable for all of the residential types proposed and would be able to support for financial

contributions to be provided for improvement to primary school capacity. The site's strong links to public transport would be a benefit to residents commuting to work and minimising the reliance of cars within the site.

With regards to landscape character and the green network, the Housing paper's site assessment does acknowledge the potential for some development to be acceptable on the site, stating "Although some limited scope for development is identified on this site, the attractive parkland character, mature woodland which coalesces in more distant views, and steeply sloping topography of the site restricts development to a very low number of units, below that which this assessment seeks to identify."

All appropriate opportunities for residential development to meet the City's needs should be embraced by CEC, regardless of scale, and Spire consider that the site represents a strong opportunity for the uses listed.

Restricting development to the western part of the site and retaining the remainder as open space will preserve the setting, and views to and from, Beechwood House. It will also retain the sense of this open space continuing from the setting of Corstorphine Hill further to the east (and behind from long distance views) and preserve the core part of its existing green network value.

Development of an appropriate density can be suitably provided for on this flatter area of land at the western edge of the site, either at a scale of detached or semi-detached properties, or of a higher height with consideration of the context of the adjacent Holiday Inn, which is circa 6-7 storeys in height.

Further design work (such as indicative layout options), strategic landscaping proposals and a Landscape and Visual Impact Appraisal or Assessment can be prepared to support potential inclusion within City Plan 2030. Spire and any development partner will also commit to providing a full suite of technical studies and specific design work to support any future planning application for this site.

5. CONCLUSION

Spire Healthcare Ltd welcome the opportunity to respond to the Choices for City Plan 2030 consultation and propose that the site on land to the south of Murrayfield Hospital, as identified in Figures 1 and 4 of this document, be included within the urban area of Edinburgh and be allocated for development on the western part of the site, with the remainder preserved as open space. Specifically, Spire will support allocation of the identified developable area for a care home, housing for the elderly / specialist housing or private / affordable market housing.

The developable area of the site currently comprises under-utilised open space within Edinburgh's 'urban' green belt within a sustainable and accessible location that is close to services and well connected to the remainder of the City.

Spire's proposal offers the potential to deliver a choice of tenures of residential accommodation which will help to deliver the City's housing land requirements and reduce the pressure for the need to support less connected and sustainable locations.

The developable area of 0.65 hectares is considered appropriate for development of circa 20-30 houses, or a care home of 50-70 beds (subject to detailed design). The proposal will also retain the majority of the site as open space, preserving amenity areas for both new residents and patients / visitors of Murrayfield Hospital.

The location of the proposed residential development at the western edge of the site will ensure it will be 'read' in long term views alongside the built development context of Holiday Inn directly to the west (which rises to 6-7 storeys in height) and the Murrayfield Hospital buildings to the north. At the same time, it will preserve the setting of, and view to and from, the Category A listed Beechwood House.

Spire will be willing to provide further design work and / or a Landscape and Visual Appraisal if required by CEC to inform their further consideration of whether to include the site as an allocation in the Proposed City Plan 2030.

Spire consider that an attractive, well designed residential development can be provided on this site which can operate without any detriment to Murrayfield Hospital. Indeed, any financial return can help fund enhancements to the services of the hospital.

The site is not considered to have any insurmountable physical or technical constraints to development, with a well designed development being capable to respect the landscape character of the area and preserve the setting of adjacent listed buildings. It is considered that issues highlighted within the site assessments undertaken for the background papers can be addressed and that they would not prevent development of the site for housing - be it a care home, a form of specialist housing or market housing - within the lifetime of City Plan 2030.

The site is located within a strong market location and Spire are confident that, allied with a lack of significant site constraints, the site can be delivered with an appropriate development partner, and without public funding, within five years of the adoption of City Plan 2030. As such, the site is considered to be effective and suitable to help deliver the Plan's housing land requirements on a sustainable, well connected site.

Accordingly, we respectfully request that CEC recognise our objection to Housing Option 1, our support for Housing Options 2 or 3 and that they include the site within the urban area of Edinburgh and allocate it for residential development or a care home, and an area of protected open space, within the emerging City Plan 2030.

