

Customer Ref: 01735 Response Ref: ANON-KU2U-GWMJ-V  
Name Philip Neaves  
Response Type Agent / Consultant  
On behalf of: Turnhouse Golf Club

Supporting Info Yes  
Email philip@felshampd.co.uk

Choice 1 A

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

Short Response Not Answered

Explanation Not Answered

Choice 1 B

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

Short Response Not Answered

Explanation Not Answered

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Choice **1 C**

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

Short Response

Explanation

Choice **1 D**

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

Short Response

Explanation

Choice **1 E**

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

Short Response

Explanation

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Supporting Info

Email

Choice 1 F

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

Short Response

Explanation

Choice 1 F

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

Short Response

Explanation

Choice 1 G

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

Short Response

Explanation

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Supporting Info

Email

Choice **1 H**

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

Short Response

Explanation

Choice **2 A**

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

Short Response

Explanation

Choice **2 B**

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

Short Response

Explanation

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Email

Choice **2 C**

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

Short Response

Explanation

Choice **2 D**

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

Short Response

Explanation

Choice **3 A**

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

Short Response

Explanation

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Choice **4 A**

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

Short Response

Explanation

Choice **4 B**

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

Short Response

Explanation

Choice **5 A**

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

Short Response

Explanation

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Email

Choice 5 B

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

Short Response

Explanation

Choice 5 C

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

Short Response

Explanation

Choice 5 D1

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

Short Response

Explanation

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Email

Choice 5 D2

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

Short Response

Explanation

Choice 5 E

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

Short Response

Explanation

Choice 6 A

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

Short Response

Explanation



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Choice **6 B**

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

Short Response

Explanation

Choice **7 A**

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

Short Response

Explanation

Choice **7 B**

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

Short Response

Explanation

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Choice **7 C**

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

Short Response

Explanation

Choice **7 D**

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

Short Response

Explanation

Choice **8 A**

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

Short Response

Explanation

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Choice **8 B**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

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Choice 9 A

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

Short Response

Explanation

Choice 9 B

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

Short Response

Explanation

Choice 10 A

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

Short Response

Explanation

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Choice **10 B**

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

Short Response

Explanation

Choice **10 C**

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

Short Response

Explanation

Choice **11 A**

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

Short Response

Explanation

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Choice 11 B

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

Short Response Not Answered

Explanation Not Answered

Choice 12 A

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

Short Response Not Answered

Explanation Not Answered

Choice 12 B1

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

Short Response Not Answered

Explanation

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Yes

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Choice

12 B2

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

Short Response

Not Answered

Explanation

Choice

12 B3

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

Short Response

Not Answered

Explanation

Choice

12 B4

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

Short Response

Not Answered

Explanation

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Choice **12 B5**

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

Short Response

Explanation

Choice **12 B6**

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

Short Response

Explanation

Choice **12 B7**

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

Short Response

Explanation



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Choice **12 B8**

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

Short Response

Explanation

Choice **12 B9**

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

Short Response

Explanation

Choice **12 B10**

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

Short Response

Explanation

Customer Ref:  Response Ref:

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Supporting Info

Email

Choice **12 BX**

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

Short Response

Explanation

Choice **12 C**

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

Short Response

Explanation

Choice **12 C**

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

Short Response

Explanation

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Yes

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Choice 12 C

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

Short Response

No

Explanation

Choice 12 D

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

Short Response

No

Explanation

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

Not Answered

Explanation

Not Answered

Customer Ref:  Response Ref:   
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Choice 14 A

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

Short Response

**Explanation** Turnhouse Golf Course is within the area defined as an Area of Search in the Choices for City Plan 2030. Choice 14 on pages 50-51 deals with West Edinburgh Growth Area and includes the Golf Club within an area of search. The consultation makes clear that there are no sites being identified or boundaries being confirmed. However, we are instructed to submit a response stating that the Golf Club is opposed to any development and setting out the reasons. In our view there is a strong position to defend any suggestion the golf course should be developed because of the important contribution it makes as a large area of open space in an increasingly urbanised area. Turnhouse Golf Course does not want to be considered for proposed future development as the Golf Course functions as a viable and sustainable business. Turnhouse Golf Course respectfully requests that the Golf Course remain allocated as green belt land. A full response to this question has been submitted separately as part of this consultation process.

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**

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Choice 14 C

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

Short Response

Explanation

Choice 15 A

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

Short Response

Explanation

Choice 15 B

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

Short Response

Explanation

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Choice 15 C

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

Short Response

Explanation

Choice 15 D

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

Short Response

Explanation

Choice 15 E

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

Short Response

Explanation

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Choice 15 G

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

Short Response

Explanation

Choice 16 A1

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

Short Response

Explanation

Choice 16 A2

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

Short Response

Explanation

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Choice **16 A3**

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

Short Response

Explanation

Choice **16 A4**

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

Short Response

Explanation

Choice **16 A5**

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

Short Response

Explanation



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Email

Choice 16 A5

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

Short Response

Explanation

Choice 16 B

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

Short Response

Explanation

Choice 16 C

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

Short Response

Explanation

Customer Ref:  Response Ref:

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Response Type

On behalf of:

Supporting Info

Email

Choice 16 E1

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

Short Response

Explanation

Choice 16 E2

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

Short Response

Explanation

Choice 16 E3

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

Short Response

Explanation

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On behalf of:

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Choice 16 E4

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

Short Response

Explanation

Choice 16 E5

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

Short Response

Explanation

Choice 16 E6

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

Short Response

Explanation

Customer Ref:  Response Ref:

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Response Type

On behalf of:

Supporting Info

Email

Choice 16 E7

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

Short Response

Explanation

Choice 16 E8

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

Short Response

Explanation

Choice 16 EX

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

Short Response

Explanation

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Choice 16 F

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

Short Response

Explanation

Choice 16 G

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

Short Response

Explanation

Choice 16 H

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

Short Response

Explanation

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**Supporting Info**

Yes

**Name**

Philip Neaves

**Email**

philip@felshampd.co.uk

**Response Type**

Agent / Consultant

**On behalf of:**

Turnhouse Golf Club

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**Turnhouse Golf Club**  
**Choices for City Plan 2030 - Edinburgh City Plan 2030 Public Consultation**  
**April 2020**

**1.0 Introduction**

Felsham Planning and Development is planning advisor to Turnhouse Golf Course. This submission is made in respect of the Choices for City Plan 2030.

Turnhouse Golf Course is within the area defined as an Area of Search in the Choices for City Plan 2030. Choice 14 on pages 50-51 deals with West Edinburgh Growth Area and includes the Golf Club within an area of search. The consultation makes clear that there are no sites being identified or boundaries being confirmed. However, we are instructed to submit a response stating that the Golf Club is opposed to any development and setting out the reasons.

In our view there is a strong position to defend any suggestion the golf course should be developed because of the important contribution it makes as a large area of open space in an increasingly urbanised area.

Turnhouse Golf Course does not want to be considered for proposed future development as the Golf Course functions as a viable and sustainable business. Turnhouse Golf Course respectfully requests that the Golf Course remain allocated as green belt land.

We have considered the development proposals at Cammo, Maybury, Edinburgh International Gateway and Edinburgh Airport's *Cross Winds* proposal. We have considered the changing character of the area around the Golf Course from these developments and the prospects of Golf Course land being developed. This assessment has been undertaken in the context of national, strategic and local planning policy and Sport Scotland's approach to loss of sports facilities.

**2.0 Background**

There are a number of development proposals in the vicinity of the Golf Club. With the exception of *Cross Winds* each is identified for development in the Local Development Plan (LDP).



The Maybury proposal (75 hectares) for housing-led development on land to the north and south of Turnhouse Road for approximately 1700 – 2000 houses and associated infrastructure.

The Cammo Proposal (28 hectares) New housing site on land to the west of Maybury Road for 500 – 700 houses and infrastructure.

The Maybury and Cammo sites lie within the Almond basin, set against the backdrop of Lennie Hill with views to the Pentlands to the south. These housing sites are served by bus, rail and tram connections and will be physically integrated with their surroundings by street design and green corridors linking to Cammo Estate Park and the River Almond to the north and the Gyle, Edinburgh Park and IBG to the south. Comprehensive master planning and phasing of development will be required drawing upon place-making and street design principles to create distinctive and sustainable urban communities at the gateway to the City.

International Business Gateway (IBG) is an opportunity for housing development as a component of business-led mixed-use proposals but the primary role of the site is in supporting strategic airport enhancement and international business development.

Edinburgh Airport intends to develop its redundant cross winds runway. This comprises 150 acres on the eastern edge of the airport. The area is currently being master planned, and the nature of the proposals are unclear, but it is expected to contain a significant business element.

It is important to note that the LDP description of key considerations stresses the importance of defining and strengthening the green belt boundary. The Golf Course forms part of the green belt boundary to the development sites and we request that it remains green belt in any forthcoming plan.



### 3.0 Planning Policy

Turnhouse Golf Course is currently allocated as green belt land. Development on the site would have to be in accordance with planning policy and inter alia Policies Env10, Env18 and Env19 would be particularly relevant. To have a site removed from the green belt the wider policy context also has to be considered to assess whether it is appropriate to do so and in compliance with the current development plan and assessment for the new Local Development Plan.

#### Edinburgh Local Development Plan (Adopted 2016)

##### *Policy Env 10 Development in the Green Belt and Countryside*

*Within the Green Belt and Countryside shown on the Proposals Map, development will only be permitted where it meets one of the following criteria and would not detract from the landscape quality and/or rural character of the area:*

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

*b) For the change of use of an existing building, provided the building is of architectural merit or a valuable element in the landscape and is worthy of retention. Buildings should be of domestic scale, substantially intact and structurally capable of conversion.*

*c) For development relating to an existing use or building(s) such as an extension to a site or building, ancillary development or intensification of the use, provided the proposal is appropriate in type in terms of the existing use, of an appropriate scale, of high quality design and acceptable in terms of traffic impact.*

*d) For the replacement of an existing building with a new building in the same use provided:*

*1) the existing building is not listed or of architectural / historic merit;*

*2) the existing building is of poor-quality design and structural condition,*

*3) the existing building is of domestic scale, has a lawful use and is not a temporary structure; and*

*4) the new building is of a similar or smaller size to the existing one, lies within the curtilage of the existing building and is of high design quality.*

##### Policy Env 18 Open Space Protection

*Proposals involving the loss of open space will not be permitted unless it is demonstrated that:*

*a) there will be no significant impact on the quality or character of the local environment and*

*b) the open space is a small part of a larger area or of limited amenity or leisure value and there is a significant over-provision of open space serving the immediate area and*

*c) the loss would not be detrimental to the wider network including its continuity or biodiversity value and either*

*d) there will be a local benefit in allowing the development in terms of either alternative equivalent provision being made or improvement to an existing public park or other open space or*

*e) the development is for a community purpose and the benefits to the local community outweigh the loss.*

#### Policy Env 19 Protection of Outdoor Sports Facilities

*In addition to the requirements of Policy Env 18, the loss of some or all of a playing field or sports pitch will be permitted only where one of the following circumstances applies:*

*a) The proposed development is ancillary to the principal use of the site as outdoor sports facilities*

*b) The proposed development involves a minor part of outdoor sports facilities and would not adversely affect the use or potential of the remainder for sport and training*

*c) An alternative outdoor sports facility is to be provided of at least equivalent sporting value in a no less convenient location, or existing provision is to be significantly improved to compensate for the loss*

*d) The Council is satisfied that there is a clear excess of sports pitches to meet current and anticipated future demand in the area, and the site can be developed without detriment to the overall quality of provision.*

#### **Scottish Planning Policy June 2014**

Scottish Planning Policy contains a presumption in favour of sustainable development and development in the appropriate locations. The SPP paragraph 49 states:

*For most settlements, a green belt is not necessary as other policies can provide an appropriate basis for directing development to the right locations. However, where the planning authority considers it appropriate, the development plan may designate a green belt around a city or town to support the spatial strategy by:*

- directing development to the most appropriate locations and supporting regeneration;*
- protecting and enhancing the character, landscape setting and identity of the settlement; and*
- protecting and providing access to open space.*

Paragraph 51 continues:

*The spatial form of the green belt should be appropriate to the location. It may encircle a settlement or take the shape of a buffer, corridor, strip or wedge. Local development plans should show the detailed boundary of any green belt, giving consideration to: ....*

- *the need for development in smaller settlements within the green belt, where appropriate leaving room for expansion; ...*
- *establishing clearly identifiable visual boundary markers based on landscape features*

### **Planning Advice Note 43 Golf Courses and Associated Development**

Planning Advice Notes (PANs) provide advice on good practice and other relevant information. The importance of retention of golf courses and associated facilities is such that it is subject to specific advice from the Scottish Government. Government policy is to encourage and increase participation in sport, including golf.

Government policy attaches particular importance to the maintenance and protection of green belts around our towns and cities. Development within green belts approved in development plans continues to be strictly controlled. One of the purposes of green belts is to provide for recreation and they may in some circumstances be suitable locations for golf courses, bearing in mind their relationship to the SSC priority areas for development.

PAN 43 paragraph 43 states:

*Associated development such as new housing is however likely to be incompatible with green belt policy unless such sites can be justified as part of an overall strategic appraisal of housing land requirements in a structure plan and where they do not undermine the continued overall effectiveness of the green belt.*

### **Planning Advice Note 65 Planning and Open Space**

Paragraph 1 states:

*Open spaces are important for our quality of life. They provide the setting for a wide range of social interactions and pursuits that support personal and community well-being. They allow individuals to interact with the natural environment and provide habitats for wildlife. They define the character and identity of settlements. Connecting them in a green network can provide enhanced benefits for people, the environment and biodiversity.*

Paragraph 6 continues:

*The future growth of settlements and the need to find sustainable locations for housing and economic development will have implications for open space. SPP 17: Planning for Transport supports higher densities in locations that are most accessible by walking, cycling and public transport. This should not lead to a loss of amenity and will place greater emphasis on the need for a well-distributed, well-connected and accessible supply of quality open space.*

Paragraph 40 states:

*The credibility of the planning system can be significantly undermined when policies on the protection and provision of open space are set aside in development management decisions without sound and clear justification, particularly where planning authorities have an interest in the land.*

## Edinburgh City Plan 2030 - Landscape and Visual Assessment of Greenfield Sites (Final Report April 2019)

The Landscape and Visual Assessment of Greenfield Sites is a background paper for the preparation of the City Choices 2030 Plan. *“This study considers opportunities and constraints for housing development on greenfield areas across Edinburgh. The study focuses on landscape and visual issues and will form part of the suite of environmental, social and sustainability information evaluated by the Council in the emerging City Plan 2030”*

### Page 53 States

#### *LCA 8 Lennie golf course*

*This golf course is located on the south and west-facing slopes of Lennie Hill, which forms part of a distinct area of low, knolly hills between the airport and Barnton. The Gold Course includes managed greens, tree groups with areas of scrub and gorse. This area abuts the Cammo Inventory site. There are a few cottages along the southern boundary of the golf course and a disused quarry and tip which is used as a Council composting facility.*

*The Lennie Hill has a complex knolly landform, which is accentuated by clumps of broadleaved trees and scrub and areas of rough grassland. Although its summit rises to only 77m, it is locally prominent in views across the Almond valley and from the A8. Development within this CAA would necessitate considerable ground modification and would be visually intrusive. It would also adversely affect the setting of Cammo Inventory site, which lies to the north-east. The hill will also provide an important undeveloped backdrop to extensive allocated developments at Maybury and Cammo. There is no scope for development in this CAA.*

## 4.0 Assessment

### Planning Policy

LDP Policy *Env 10 Development in the Green Belt and Countryside* criterion a) states that development in the green belt will not be permitted unless necessary for the purposes of agriculture, woodland and forestry, horticulture or for countryside recreational use compatible with an agricultural or natural setting.

In this case the combination of green belt policy and the requirement to have *a positive impact on the character and appearance of the special landscape area* will be significant tests to overcome and we do not believe that planning permission will be granted for housing development on golf course land in the green belt.

The site is identified in the LDP as a *Special Landscape Area (SLA)*. Policy *Env 11 Special Landscape Areas* states that planning permission will not be granted for development which would damage or detract from the overall character and appearance of the SLA.

Policy *Env18* aims to protect all open spaces, both public and privately owned, that contribute to the amenity of their surroundings and the city, provide or are capable of providing for the recreational

needs of residents and visitors or are an integral part of the City's landscape and townscape character and its biodiversity. The Council will only support development on open space in exceptional circumstances, where the loss would not result in detriment to the overall network and to open space provision in the locality. Such circumstances tend to exist where large areas of residential amenity space have been provided without a clear purpose or sense of ownership. The Council's Open Space Strategy sets the standards to be met for open space provision across Edinburgh and will be used to assess whether there is an over provision of open space in the immediate area (criterion b). To accord with criterion d), proposals for alternative provision or improvements to open space should normally address an identified action in the Open Space Strategy.

Outdoor sports facility provision must be considered as a city-wide resource and in terms of its contribution to local needs. The Council's assessment of provision in the city as a whole has concluded that the amount of pitches, whether or not in public ownership or publicly accessible, is equivalent to the need. However, there needs to be significant improvements in quality. On this evaluation, the loss of pitches to development cannot be justified in principle.

Whilst policy Env18 identifies circumstances where loss of sports facilities may be permissible, we do not believe that such circumstances apply to the Golf Course. We would expect objections from Sport Scotland for any proposals to develop Golf Course land.

The Landscape and Visual Assessment of Greenfield Sites is a background report for the new LDP. It is specific in its assessment of the land at Lennie Hill and the land forming the Turnhouse Golf Course site.

It is clear that it considered the removal of the Golf Course from the green belt to accommodate development. It concludes that the development of the land would involve **considerable ground modification and would be visually intrusive**. There would also be an adverse impact on the Cammo Inventory Site and the Golf Course and Lennie Hill also provide a green backdrop to the other proposed developments at Maybury and Cammo.

The Assessment concludes *There is no scope for development in this CAA*.

In terms of SPP paragraph 49 the Golf Course fulfils a clear function in:

- *protecting and enhancing the character, landscape setting and identity of the settlement; and*
- *protecting and providing access to open space.*

This role is increasingly important given its location in a rapidly urbanising area where further developments are planned.

Preserving the Golf Course from development follows an established land use pattern across Edinburgh, for example Corstorphine Hill and the Braid Hills, where the elevated land is preserved

and kept free from the development that surrounds it and in so doing provides open space and access to the countryside and to sport, including Golf Courses.

### **Suitability of Golf Course Land for Development**

Land has been removed from the green belt on all sides of Turnhouse Golf Course. The Golf Course remains part of the green belt and the LDP development allocations for Cammo and Maybury stress the importance of maintaining and strengthening the green belt boundaries. The Golf Course has become an important green wedge in a rapidly urbanising area. The planning system stresses the importance of green space within the urban area.

Given the extent of development in this area, with c 2000 dwellings either allocated or consented, the importance of the Golf Course is paramount in providing a continued landscape setting and green wedge. We consider the golf course to be analogous to Braid Hills and Murrayfield Golf Courses where development has engulfed the golf courses and has matured over many years and development of the golf courses themselves is now unthinkable.

Edinburgh is tightly constrained and development in this area continues a pattern of development that has been evident in waves over 20-year periods for the last century. Examination of maps over these intervals since the 1930s shows growth westward has been an obvious trend as Edinburgh moves steadily west towards its physical boundaries. This can be seen in current activity where land at New Ingliston has now been taken out of the green belt and is promoted as Edinburgh International. It provides a significant opportunity to help unlock Scotland's full economic potential and comprises of Edinburgh Airport, The Royal Highland Centre, a strategic reserve of employment land currently known as the International Business Gateway and associated rail, road and tram infrastructure. RHS has plans for its land; 365 acres is available for development at land at Gogar between A8 and railway; PPG has proposals for a major development at Hermiston; and in West Lothian Winchburgh is being developed for up to 5000 homes along M9 towards Newbridge.

Over the next 20 years it is anticipated that Ratho and Newbridge will be further developed; the airport land will be developed; business will shift to the airport; land on the airport periphery around the Cammo Estate will be developed for residential; and Edinburgh Park will increasingly change to become a brownfield housing site, with the Gyle acting as town centre. This will continue to place pressure on the west until it reaches its natural limits. Within this area of large scale expansion it is important to ensure that there are green spaces and to maintain those green spaces. Turnhouse Golf Course fulfils this function.

Site specific environmental designations contained in the LDP will also need to be considered in the development of any of the subject sites. These can affect inter alia, the acceptable uses, layout, design, landscaping, access and density of a proposal.

For a site to be suitable for development and in order to make a planning case, it will be necessary to demonstrate the site's suitability, availability and viability and address the following factors:

- The availability of infrastructure, including education and community facilities.

- Whether the development can realistically be achieved within a 5-year timeframe, or within such timeframe that it helps reduce the pressure on the planning authority to deliver it's already allocated sites.
- The provision of choice across the housing market area.
- The design, quality and density of development that can be achieved.
- The individual and cumulative impacts of the proposed development.
- The potential significant adverse effect on any natural or built heritage interests

### **Availability**

The Golf Course is not available for development within the timeframe of the LDP. The existing lease runs beyond the life of the LDP Review.

### **Loss of Sports Facilities**

The Golf Course is a functioning leisure facility and business. It provides green space and sports facilities. The landscape benefits from mature trees, shrubs, a mixture of maintained and managed grassland and a network of paths. The replacement of this facility in another location is not practical or viable to free up the Golf Course for development is not an option.

### **Development Viability**

The development of the golf course and its resultant relocation would create considerable costs and is not viable. The costs will include:

- Like for like replacement of Golf Course facilities before development commences – this will be expensive and will impact on cash flow. Developers seek to negotiate planning application legal agreements on the basis that they can commence development and obtain sales revenues before delivering planning gain. The replacement of golf course facilities will be a major cost that will have to be met before any sales revenue is achieved and the developer will need to fund this cost from their cash reserves
- Connection to services – the golf course land in question is removed from existing services and the developer will need to provide and fund these connections. This will be a significant cost.

It is questionable whether development of the golf course would be financially viable.

## **5.0 Conclusions**

There is a strong argument against future development of Golf Course land:

1. The land is not available for development within the timeframe of the LDP
2. The land is within the green belt where there is a presumption against development and there is no strong justification for its removal

3. The Council's background paper Landscape and Visual Assessment of the Greenfield Sites concludes that this area is not suitable for future development.
4. There is a presumption against the loss of sports facilities and open space
5. There is a significant amount of approved and proposed developments that adjoin and are close to the golf course. This will have a significant urbanising effect. Weight is given to preservation of green space within the urban area and the golf course is an important 'green wedge'
6. Sport Scotland will expect any loss of facilities to be made up on a 'like for like' basis
7. Sport Scotland and the Council are likely to expect replacement facilities to be provided at the developer's cost before the facilities they are to replace are lost. This will have a significant impact on the developer's cash flow
8. Scottish Golf are likely to object to the loss of a facility to an alternative development proposal and object to the redevelopment of the course land
9. We would expect considerable local objection to loss of all or parts of the golf course to redevelopment. Such objection would carry weight in making decisions on planning applications

We consider development of Golf Course land is not in accordance with the wider development plan. We do not consider that there are any material considerations that would overcome this policy objection.

For these reasons we believe that the Turnhouse Golf Course should remain in the green belt.