

Response ID ANON-KU2U-GPRA-H

Submitted to **Choices for City Plan 2030**

Submitted on **2020-04-30 16:34:22**

Your information and data

1 What is your name?

Name:

Diarmid Jamieson

2 What is your email address?

Email:

[REDACTED]

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

Full address including postcode:

Inch House, 225 Gilmerton Road, Edinburgh EH16 5UF

4 I am responding as

Amenity Organisation

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

Agent on behalf of:

Inch Community Education Centre Association (Reg. Charity SC001317)

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

Yes

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

1A We want to connect our places, parks and green spaces together as part of a city-wide, regional, and national green network. We want new development to connect to, and deliver this network. Do you agree with this?

Not Answered

Explain why:

1B 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?

Not Answered

Explain why:

1C We want to identify areas that can be used for future water management to enable adaptation to climate change. Do you agree with this?

Not Answered

Explain why:

1D 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?

Not Answered

Explain why:

1E We want to introduce a new 'extra-large green space standard' which recognises that as we grow communities will need access to green spaces more than 5 hectares. Do you agree with this?

Yes

Explain why:

Inch Park is designated as an 'extra large green space' in the CityPlan 2030 Choices document. As part of a wider programme to carry out a 'Survey of Gardens and Designed Landscapes' in the city, CEC commissioned a report into the Inch Park, which was completed by Peter McGowan Associates in Sept. 2007.

The 2007 Report sets out the history and unique features of Inch Park and concludes:

"Very little attention has been paid to the historic layout of the estate in the management and planning of facilities over several decades and there is no external interpretation. While sites for schools and the flood prevention scheme are essential, much could have been done to restore the planting structure and avoid spoiling the setting of the house with play facilities. The location and fencing around the nursery is also an impediment to the functioning of The Inch as a park. Overall the place has great attraction and could be improved in many ways, including by the better integration of various uses and adaptation to new pressures in the future, that should be considered in the context of a Conservation Management Plan" "Overall an estate landscape that now accommodates many modern functions although surviving in large part as a public park with many attractive features, but where a coordinated plan is needed to conserve its values and to plan and enhance it for the future."

The Inch Association notes that the findings of this 2007 survey do not appear to have been progressed and we are not aware that any such coordinated plan has been implemented by CEC for the conservation and management of Inch Park.

1F 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?

Not Answered

Explain why:**Upload (max size 3mb):**

No file was uploaded

1G We want to identify space for additional cemetery provision, including the potential for green and woodland burials. Do you agree with this?

Not Answered

Explain why:**1H 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?**

Not Answered

Explain why:**Choice 4 - Creating Place Briefs and supporting the use of Local Place Plans in our communities****4A We want to work with local communities to prepare Place Briefs for areas and sites within City Plan 2030 highlighting the key elements of design, layout, and transport, education and healthcare infrastructure development should deliver. Do you agree with this?**

Yes

Explain why:

It is vitally important to take account of local community concerns about their individual areas in developing Place Briefs.

4B 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?:**

The Council should establish a clear framework, process and timetable for development of Local Place Plans and then engage with the established local community organisations regarding the contents of these.

Choice 12 - Building our new homes and infrastructure**12A Which option do you support?**

Option 3 (Blended approach)

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

Probably the most flexible approach

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

Support Greenfield - Support:

Support Greenfield - Object:

Explain why:

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

Greenfield file upload:

No file was uploaded

Greenfield file upload:

No file was uploaded

Greenfield file upload:

No file was uploaded

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

Brownfield sites upload:

Objections of ICECA to proposed housing development in Inch Park.pdf was uploaded

Environmental Report

18 Do you have any comments on the environmental impacts set out in the Environmental Report arising from the Choices?

Yes

Please use the space below for comments.:

The 'Cultural Heritage Plan' of Edinburgh included in the Environmental Report does not include any mention of Inch House or Park. Given that Inch House is an A-listed historic 16th/17th Century tower house and along with its adjacent walled garden, is of significant historic and cultural value and interest, this is a significant omission from the CityPlan 2030 supporting documents that should be corrected.

OFFICIAL RESPONSE OF INCH COMMUNITY EDUCATION CENTRE ASSOCIATION (ICECA) TO THE PROPOSAL CONTAINED IN THE CITYPLAN 2030 DOCUMENT TO DESIGNATE INCH PARK FOR HOUSE-BUILDING PURPOSES

This response to the City of Edinburgh Council's (CEC) 'City Plan 2030' document (January 2020) has been prepared by Inch Community Education Centre Association, a registered Scottish Charity (SC001317) based at: Inch House, 225 Gilmerton Road, EH16 5UF.

Inch Community Education Centre Association

We are a local member-based charity responsible for running the Inch Community Education Centre, located within Inch House, an A-listed 16th/17th century tower house of exceptional architectural importance set within the extensive parkland and gardens of the surrounding Inch Park. Our aims include the strengthening of community resilience within the Inch residential estate through promotion of education and social welfare for the local community and improving understanding of and participation in active citizenship, community development, urban regeneration, culture, heritage, the arts and recreation, by local residents and the wider community.

Inch House is a focal point for the surrounding Inch community and through our custodianship of Inch House, the SCIO currently provides a wide range of services and facilities to all elements of the community (although targeted, whenever possible, at those most in need) including a youth programme, cultural and historical activities, exercise courses, adult learning and 'golden years' events (for older residents). We also host and support many related community programmes such as scouts, provision for special needs children, and breast-feeding courses for young mums. Our future aims include broadening out our activities and community outreach via an expanded programme that in future will provide a community café and associated activities to promote healthy eating within the community, including cooking courses and a kitchen garden on adjacent land to deliver invaluable social inclusion benefits.

Inch Park

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A copy of the plan of Inch Park from this report is shown at the end of this document; it includes the following features: Inch House, West Gate and original Walled Garden (WG) – with this latter now part of the fenced-off Nursery area used by CEC to provide plants for the whole City. This nursery area with its original walled garden and parkland areas, is an integral part of the historic Inch House and Estate, of which the current Inch Park is the remnant.

The 2007 Report sets out the history and unique features of Inch Park and concludes:

“Very little attention has been paid to the historic layout of the estate in the management and planning of facilities over several decades and there is no external interpretation. While sites for schools and the flood prevention scheme are essential, much could have been done to restore the planting structure and avoid spoiling the setting of the house with play facilities. The location and fencing around the nursery is also an impediment to the functioning of The Inch as a park. Overall the place has great attraction and could be improved in many ways, including by the better integration of various uses and adaptation to new pressures in the future, that should be considered in the context of a Conservation Management Plan” *“Overall an estate landscape that now accommodates many modern functions although surviving in large part as a public park with many*

attractive features, but where a coordinated plan is needed to conserve its values and to plan and enhance it for the future.”

The Inch Association notes that the findings of this 2007 survey do not appear to have been progressed and we are not aware that any such coordinated plan has been implemented by CEC for the conservation and management of Inch Park.

We also note that Inch House and Park are missing from the ‘Cultural Heritage Map’ included in the Environmental Report (January 2020) that supports the City Plan 2030 document (refer below).

City Plan 2030 and supporting documents

We understand that the purpose of the City Plan 2030 document is to invite comments that can be used by CEC to complete the process of preparation of the new Local Development Plan (LDP) for Edinburgh that will set out the development areas and designations that will provide the framework and zoning for delivery of the key objectives of the City Plan, particularly in terms of key metrics like sustainable transport, affordable housing, zero carbon, economic success and people-focus.

The core document, ‘**Choices for City Plan 2030**’ contains a number of key references to Inch Park; these are:

- Map 1 – identifies Inch Park as an ‘extra large green space’;
- Map 3 – indicates the route of the proposed Transport Corridor 3 (SE Edinburgh - Bioquarter) immediately adjacent to the east of Inch Park (route of A7);
- Maps 7 & 8 identify the area of Inch Park currently used by CEC as its plants Nursery, as Urban land suitable for housing led mixed use;
- Map 15 – includes the Inch Nursery site amongst those from elsewhere in the city considered suitable for housing-led mixed-use under CEC’s proposed ‘Option 3 blended approach’*.

*NOTE: CEC is considering 3 possible options with respect to its delivery strategy for new housing, i.e. using:

1. Delivery by the Council and its partners within the Urban Area;
2. Delivery through market housing by releasing Greenfield land;
3. A Blended Approach (of 1 and 2).

With respect to new housing development, the Inch Nursery is a designated ‘brownfield’ site in the supporting **Housing Report** for consideration for new housing, as shown below, i.e. 4.65 Ha area with medium density housing of between 465-813 housing units.

Assessment Area 8- Inch Nursery - Cameron Toll – Prestonfield

Site No.	Site name	Area (Ha)	Density	Low	High	Current Use
353	Peffermill Road	0.2	L	12	20	Retail
364	Old Dalkeith Road	0.28	L	16	28	Retail
372	Inch Nursery	4.65	M	465	813	Employment - industrial
	TOTAL	5.13		493	861	

Overall the Housing Report concludes that around 22,600 units of market housing and 20,800 units of affordable homes will be required by 2027, with a substantial proportion of these likely to be developed on urban or brownfield land.

Part 2a of the Housing Report carries out a screening assessment of the various sites included in the designated Urban Area. This includes Site 8 – the Inch Nursery, Cameron Toll – Prestonfield area, with the screening criteria based on local access to services, amenities and transport and the level of flood risk. The outcomes from this are summarised below:

Figure 2 - Assessment of site groupings

Assessment Group Number	Assessment Group Name	10 min walk to local convenience services	30 min walk to employment clusters	Access to wider cycle network	Active travel overall	Public transport	Community infrastructure	Flood risk	Summary
1	North Leith	Green	Green	Green	Green	Green	Green	Green	Green
2	Leith - Bonnington & Leith Walk	Green	Green	Green	Green	Green	Green	Green	Green
3	Beaverbank	Green	Green	Green	Green	Green	Green	Green	Green
4	Lochend - Meadowbank	Green	Green	Green	Green	Green	Green	Green	Green
5	Seafield	Green	Green	Green	Green	Green	Green	Green	Green
6	Portobello	Green	Red	Green	Green	Green	Green	Green	Red
7	Niddrie - Bingham - Willowbrae	Green	Green	Green	Green	Green	Green	Green	Green
8	Inch Nursery - Cameron Toll - Prestonfield	Green	Green	Red	Red	Green	Green	Green	Red
9	Southside	Green	Green	Green	Green	Green	Green	Green	Green
10	Liberton Hospital	Green	Green	Green	Green	Green	Green	Green	Green
11	Astlie Ainslie	Green	Green	Green	Green	Green	Green	Green	Green
12	Redford Barracks	Green	Green	Green	Green	Green	Green	Green	Green
13	Wester Hailes	Green	Green	Green	Green	Green	Green	Green	Green
14	Lanark Road	Green	Green	Green	Green	Green	Green	Green	Green
15	Gorgie - Dalry	Green	Green	Green	Green	Green	Green	Green	Green
16	Fountainbridge	Green	Green	Green	Green	Green	Green	Green	Green
17	New Town	Green	Green	Green	Green	Green	Green	Green	Green
18	Orchard Brae - Craigleith	Green	Green	Green	Green	Green	Green	Green	Green
19	Pilton	Green	Green	Green	Green	Green	Green	Green	Green
20	Silverlea	Green	Green	Green	Green	Green	Green	Green	Green
21	Corstorphine	Green	Green	Green	Green	Green	Green	Green	Green
22	West Edinburgh	Green	Green	Green	Green	Green	Green	Green	Green
23	Government Buildings	Green	Green	Green	Green	Green	Green	Green	Green

Suitability for development Yes Partially No. See Figure 1 at page 3 for assessment criteria

Site Number	Area Name	Assessment Group Number	10 min walk to local convenience services	30 min walk to employment clusters	Access to wider cycle network	NCN/Quiet route 5 year intervention	Active Travel (overall)	Public Transport	Primary Capacity	Secondary Capacity	Community Infrastructure Overall	Flood Risk	Summary
349	Russell Road (Royal Mail)	15	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
350	Willowbrae Road	7	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
352	Niddrie Mains Road (B)	7	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
353	Peffermill Road	8	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
356	Dalry Road	15	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
357	Westfield Road (B)	15	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
361	Murrayburn Road (B)	13	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
363	West Gorgie Park	15	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
364	Old Dalkeith Road	8	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
367	Redford Barracks	12	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
368	Peatville Gardens	13	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
369	Murrayburn Road (Murrayburn Motors)	13	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
371	Cowan's Close	9	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
372	Inch Nursery	8	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Red
374	Moredun Park Loan		Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
375	Moredun Park View		Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
376	Peffer Place	7	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
378	Russell Road	15	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
379	Lanark Road (D)	14	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
381	Lanark Road (B)	14	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
382	Stead's Place	2	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
383	Seafield	5	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
384	Jane Street	2	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
385	Cornuma Place	2	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
386	Commercial Street	1	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
387	North Leith Sands	1	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

Suitability for development Yes Partially No. See Figure 1 at page 3 for assessment criteria

Based on this assessment, the Inch site (refer site numbers 8 & 372) was allocated red (unsuitable) designations for Primary Capacity and access to cycle and active travel networks, thus leading to an overall red (unsuitable) designation for housing development.

The City Plan 2030 is also supported by the findings of the **Environmental Report**, which assesses the environmental risks of the proposed housing development sites. Appendix 4 of this report includes the following risk screening summary for the Inch Nursery site. This indicates that the site received red (high environment risk) designations for two criteria, A4 (encourage provision of low/zero carbon

technologies) and M1 (encourage and enhance protection of open spaces) and amber (uncertain risk) designations for five other criteria.

Site Assessment: (372) Inch Nursery (South East Locality)																													
SEA Objective	Biodiversity					Population				Soil	Water			Air & Climate				Material Assets		Heritage						Landscape			
Question	B1	B2	B3	B4	B5	P1	P2	P3	P4	S1	W1	W2	A1	A2	A3	A4	M1	M2	H1	H2	H3	H4	H5	H6	L1	L2	L3	L4	
Effect	-	?	-	-	-	-	-	✓	✓	?	?	?	-	✓	-	x	x	✓	-	-	-	-	-	-	-	?	-	-	-
Comment	Existing use is Inch Nursery. Adjacent uses designated open space. Part of site is in 1 in 200 year flood zone, and is existing designated open space. The site is within the catchment area for a river or burn, where there is known to be engineered alterations to the river (considered in bad/poor condition by SEPA) and therefore development of the site will need to take into account the reduced resilience of this river with regard to surface water. Site is adjacent to a core path, existing open space and a LNCS. Site is visible in several protected view cones. Site visible in some local views. Site has a landscape setting.																												
Mitigation	A flood risk assessment would be required for this site which has a risk of flooding as part of the site is within a 1 in 200 year flood zone. If developable, an appropriate design of development is required in order to ensure that there is no associated increase in flood risk outwith the site and to ensure that there is no unacceptable flood risk for future uses of the site. The design and layout of this site will have to include greater attenuation than standard practice to reduce the risk of surface water flooding and its impacts. Design and layout of development should seek to make linkages with the adjacent open space and core path. An suitable assessment should be carried out to ensure the development of the site has no detrimental impact on the natural heritage interests of the designation. Comprehensive visual and townscape appraisals required to determine appropriate mass, scale, height and layout of new development.																												

Discussion

Against a backdrop of the 2007 Inch Park Report which acknowledges the unique aspects of Inch Park, including Inch House, the walled garden and the park’s landscape value, CEC appears not to have acted on the findings of this report, in terms of either (a) developing a Conservation Plan to protect and enhance Inch Park or (b) including Inch House on the city Cultural Heritage Plan (as set out in the City Plan 2030 document). The 2007 Report also notes that the location and fencing around the CEC Nursery is an impediment to the functioning of The Inch as a park.

CEC propose the inclusion of a medium density housing development (of 465-813 households) on the 4.65Ha Inch Nursery site in the local development plan. This development would cover the existing Inch House walled garden and surrounding wooded area (all currently fenced off from the rest of Inch Park) and result in a new population of up to around 2,000 residents who would require access to transport, schools, medical services and other local amenities.

CEC’s own analysis of housing development on this site has indicated several issues (e.g. travel, capacity, flood risk, protection of open spaces and encouragement of low carbon technologies) which make the site unacceptable for housing development, without significant mitigation of these factors.

Taking account of the above factors, the Inch Association considers that development of the Inch Nursery site for housing is an entirely unsuitable use of this parcel of land. CEC appears to have overlooked the unique cultural, historical and amenity value of Inch Park to Edinburgh (including Inch House and adjacent walled garden and parkland), as set out in its own 2007 Report and also omitted this from the City Plan 2030 document. In addition, its own preliminary analysis of the Nursery Site has concluded that for several reasons, the development of this site for housing is unacceptable.

A housing development on the Inch Nursery site (i.e. the site of the Inch House walled garden and surrounding parkland) would permanently destroy the historic and cultural value of Inch Park, as well as substantially degrading its amenity value as a unified green community space within the city. As part of its wider community objectives, the Inch Community Association is currently developing an alternative vision and future plan for Inch House and the adjacent CEC Nursery space, which is based on restoration of the house, walled garden and development of the adjacent parkland for community use, benefit and enjoyment.

In summary the Association considers that the proposal to designate the Inch Nursery parcel of land for housing development in the new LDP, to be a threat to the integrity and future of Inch Park as a valuable community and city asset and we cannot support this proposal.



Key			
	Site boundary		Essential setting
	Ruined buildings		Site of former house
	Principal buildings		Main drive
	Gardens		Principal views or vista
	Water		Panoramic View
	Woodlands		Walled Garden
	Parkland		

EDINBURGH
THE CITY OF EDINBURGH COUNCIL

**SURVEY OF GARDENS AND
DESIGNED LANDSCAPES**

Peter McGowan
Associates with
Christopher Dingwall

OFFICIAL RESPONSE OF INCH COMMUNITY EDUCATION CENTRE ASSOCIATION (ICECA) TO THE PROPOSAL CONTAINED IN THE CITYPLAN 2030 DOCUMENT TO DESIGNATE INCH PARK FOR HOUSE-BUILDING PURPOSES

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City Plan 2023 and supporting documents

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*NOTE: CEC is considering 3 possible options with respect to its delivery strategy for new housing, i.e. using:

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20	Silverlea	Green	Green	Green	Green	Green	Green	Green	Green
21	Corstorphine	Green	Green	Green	Green	Green	Green	Green	Green
22	West Edinburgh	Green	Green	Green	Green	Green	Green	Green	Green
23	Government Buildings	Green	Green	Green	Green	Green	Green	Green	Green

Suitability for development Yes Partially No. See Figure 1 at page 3 for assessment criteria

Site Number	Area Name	Assessment Group Number	10 min walk to local convenience services	30 min walk to employment clusters	Access to wider cycle network	NCN/Quiet route 5 year intervention	Active Travel (overall)	Public Transport	Primary Capacity	Secondary Capacity	Community Infrastructure Overall	Flood Risk	Summary
349	Russell Road (Royal Mail)	15	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
350	Willowbrae Road	7	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
352	Niddrie Mains Road (B)	7	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
353	Peffermill Road	8	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
356	Dalry Road	15	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
357	Westfield Road (B)	15	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
361	Murrayburn Road (B)	13	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
363	West Gorgie Park	15	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
364	Old Dalkeith Road	8	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
367	Redford Barracks	12	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
368	Peatville Gardens	13	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
369	Murrayburn Road (Murrayburn Motors)	13	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
371	Cowan's Close	9	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
372	Inch Nursery	8	Green	Green	Red	Red	Green	Green	Red	Green	Green	Green	Red
374	Moredun Park Loan		Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
375	Moredun Park View		Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
376	Peffer Place	7	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
378	Russell Road	15	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
379	Lanark Road (D)	14	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
381	Lanark Road (B)	14	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
382	Stead's Place	2	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
383	Seafield	5	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
384	Jane Street	2	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
385	Cornuma Place	2	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
386	Commercial Street	1	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
387	North Leith Sands	1	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

Suitability for development Yes Partially No. See Figure 1 at page 3 for assessment criteria

Based on this assessment, the Inch site (refer site numbers 8 & 372) was allocated red (unsuitable) designations for Primary Capacity and access to cycle and active travel networks, thus leading to an overall red (unsuitable) designation for housing development.

The City Plan 2030 is also supported by the findings of the **Environmental Report**, which assesses the environmental risks of the proposed housing development sites. Appendix 4 of this report includes the following risk screening summary for the Inch Nursery site. This indicates that the site received red (high environment risk) designations for two criteria, A4 (encourage provision of low/zero carbon

technologies) and M1 (encourage and enhance protection of open spaces) and amber (uncertain risk) designations for five other criteria.

Site Assessment: (372) Inch Nursery (South East Locality)																													
SEA Objective	Biodiversity					Population				Soil	Water			Air & Climate				Material Assets		Heritage						Landscape			
Question	B1	B2	B3	B4	B5	P1	P2	P3	P4	S1	W1	W2	A1	A2	A3	A4	M1	M2	H1	H2	H3	H4	H5	H6	L1	L2	L3	L4	
Effect	-	?	-	-	-	-	-	✓	✓	?	?	?	-	✓	-	x	x	✓	-	-	-	-	-	-	?	-	-	-	
Comment	Existing use is Inch Nursery. Adjacent uses designated open space. Part of site is in 1 in 200 year flood zone, and is existing designated open space. The site is within the catchment area for a river or burn, where there is known to be engineered alterations to the river (considered in bad/poor condition by SEPA) and therefore development of the site will need to take into account the reduced resilience of this river with regard to surface water. Site is adjacent to a core path, existing open space and a LNCS. Site is visible in several protected view cones. Site visible in some local views. Site has a landscape setting.																												
Mitigation	A flood risk assessment would be required for this site which has a risk of flooding as part of the site is within a 1 in 200 year flood zone. If developable, an appropriate design of development is required in order to ensure that there is no associated increase in flood risk outwith the site and to ensure that there is no unacceptable flood risk for future uses of the site. The design and layout of this site will have to include greater attenuation than standard practice to reduce the risk of surface water flooding and its impacts. Design and layout of development should seek to make linkages with the adjacent open space and core path. An suitable assessment should be carried out to ensure the development of the site has no detrimental impact on the natural heritage interests of the designation. Comprehensive visual and townscape appraisals required to determine appropriate mass, scale, height and layout of new development.																												

Discussion

Against a backdrop of the 2007 Inch Park Report which acknowledges the unique aspects of Inch Park, including Inch House, the walled garden and the park’s landscape value, CEC appears not to have acted on the findings of this report, in terms of either (a) developing a Conservation Plan to protect and enhance Inch Park or (b) including Inch House on the city Cultural Heritage Plan (as set out in the City Plan 2030 document). The 2007 Report also notes that the location and fencing around the CEC Nursery is an impediment to the functioning of The Inch as a park.

CEC propose the inclusion of a medium density housing development (of 465-813 households) on the 4.65Ha Inch Nursery site in the local development plan. This development would cover the existing Inch House walled garden and surrounding wooded area (all currently fenced off from the rest of Inch Park) and result in a new population of up to around 2,000 residents who would require access to transport, schools, medical services and other local amenities.

CEC’s own analysis of housing development on this site has indicated several issues (e.g. travel, capacity, flood risk, protection of open spaces and encouragement of low carbon technologies) which make the site unacceptable for housing development, without significant mitigation of these factors.














Taking account of the above factors, the Inch Association considers that development of the Inch Nursery site for housing is an entirely unsuitable use of this parcel of land. CEC appears to have overlooked the unique cultural, historical and amenity value of Inch Park to Edinburgh (including Inch House and adjacent walled garden and parkland), as set out in its own 2007 Report and also omitted this from the City Plan 2030 document. In addition, its own preliminary analysis of the Nursery Site has concluded that for several reasons, the development of this site for housing is unacceptable.

A housing development on the Inch Nursery site (i.e. the site of the Inch House walled garden and surrounding parkland) would permanently destroy the historic and cultural value of Inch Park, as well as substantially degrading its amenity value as a unified green community space within the city. As part of its wider community objectives, the Inch Community Association is currently developing an alternative vision and future plan for Inch House and the adjacent CEC Nursery space, which is based on restoration of the house, walled garden and development of the adjacent parkland for community use, benefit and enjoyment.

In summary the Association considers that the proposal to designate the Inch Nursery parcel of land for housing development in the new LDP, to be a threat to the integrity and future of Inch Park as a valuable community and city asset and we cannot support this proposal.



Key

- | | |
|---|--|
|  Site boundary |  Essential setting |
|  Ruined buildings |  Site of former house |
|  Principal buildings |  Main drive |
|  Gardens |  Principal views or vista |
|  Water |  Panoramic View |
|  Woodlands |  Walled Garden |
|  Parkland | |

EDINBURGH
THE CITY OF EDINBURGH COUNCIL

**SURVEY OF GARDENS AND
DESIGNED LANDSCAPES**

Peter McGowan
Associates with
Christopher Dingwall