

Customer Ref: 01358 Response Ref: ANON-KU2U-GWG6-2
Name: Richard M henderson
Response Type: Community Council
On behalf of: Balerno Community Council

Supporting Info: Yes

Email: [REDACTED]

Choice 1 A

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

Short Response: Yes

Explanation
The Council agrees the general proposition and supports both connecting places, parks and green spaces together as part of a city, regional and national green network, and also that new developments should connect to and deliver such a network. The Council in particular would support creation of connections which are safe for all those accessing such places. Thus for example, •Provision should be made for a safe pathway between Balerno and the Pentland Hills the absence of which is a danger to pedestrians. •Provision should be made for a safe section of cycle route 75 to the west of Bridge Road at Balerno. •Provision should be made for a pathway or pavement on the A70 at Hannahfield, the absence of which is a danger to pedestrians. •Provision should be made for a controlled pedestrian crossing on the A70 between Somerville Road, Balerno and Dolphin Avenue in Currie , a distance of about one mile ; absence of such a crossing creates danger for pedestrians including in particular for bus passengers alighting at one of the intervening stops on Balerno bound services. •Provisions should be made to upgrade the paths network through the Ravelrig estate in Balerno, that not currently being effectively maintained and being potentially hazardous. •Provision should be made for the restoration of the pedestrian route across the 'Green Bridge' in Balerno across the Bavelaw Burn. The closure by Edinburgh Council of the 'Green Bridge' severed a right of way, and the continuing failure by Edinburgh Council to remove the condemned structure is preventing measures to replace the bridge and reconnect the local paths network.

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Choice **1 B**

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

Short Response

Explanation

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

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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 in part only. We agree that the condition of designated open space areas must be monitored. Questions will arise as to what is meant by 'poor quality' or 'underused'. There are areas of open space for example at Malley Bing off Harlaw Road that have simply been abandoned by the CEC such that they are now of limited actual use but That does not mean we want them to be given up. They have a high potential value. We do not agree that designated open space should be used for housing or other development simply because of its condition. The remedy for poor quality of underused open space is to render it of better quality and ensure its availability for active use. It should be the responsibility of the owner of designated open space to put it in a condition in which it is useable. Where open space cannot be rendered useable because of its condition it is open to the planning authority to re-designate in which case alternative provision of open space in the same area must be made. Processes analogous to improvement notices should be engaged to require improvements to be undertaken where necessary.

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 We agree that communities require green space and that should be taken to mean in excess of 5 hectares. Balerno has one public park, Marchbank Park, which we estimate to be under one hectare in size. Malleny Park in Balerno is effectively a sports ground and not a green space to which communities have unrestricted access. Malleny Bing – see above – is not looked after properly by CEC. Developers should be required to ensure provision of sufficient green space for the community in which they are undertaking development.

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Choice 1 F

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

Short Response

Explanation We agree that specific sites should be identified for new allotments and food growing. New allotment space must be acceptable to the community as a whole and not simply to prospective allotment holders. A site was identified in Balerno in 2015 at the derelict Ravelrig Walled Garden for development of a community garden, for which grant aid for development would have been available. The site is within the former Ravelrig Estate and includes an informal paths network of considerable value to the community . It is not designated as open space. Negotiations for a lease were not successful and the project was not pursued. The site remains derelict and the paths network is deteriorating and is insufficiently maintained for current use levels.

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

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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: No

Explanation
We do not agree with designation of open space for woodland burial within the City of Edinburgh. We do not consider that green and/or woodland burial sites are appropriate in urban or semi-rural, semi-urban locations. We consider that such sites in such settings would carry serious risks of vandalism. We do not support additional cemetery provision in the Balerno area. We have had no representations for extension of Currie Kirkyard. We understand that while there are some 541000 deaths in the UK pa, the proportion of burials is 140,000 each year – source FT Feb 2019. We consider that use of land for burial effectively sterilises that land for hundreds of years and is not easily justifiable in land use terms.

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: Yes

Explanation
We agree that green spaces must have long term maintenance and management arrangements in place, and we believe further that steps must be taken to ensure that existing green space is similarly protected.

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Choice **2 A**

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

Short Response

Explanation

Choice **2 B**

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

Short Response

Explanation

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Choice 2 C

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

Short Response

Explanation We agree that active travel and connectivity links are critical policy objectives and that appropriate design and layout policies are essential to achieving that end.

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 We agree that all development must deliver quality open space and public realm. We consider however that this objective must rank higher than and therefore must displace density objectives.

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 We consider that standards set out in the current Scottish Building Regulations should apply to new development in Edinburgh. We understand that the net-zero carbon standard is to be required in all cases of new public building, and we are not aware of reasons why a differential or lower standard might be appropriate for private developments.

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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 http://www.balerno-communitycouncil.org.uk/community-council.html. We would hope for a positive engagement with CEC in that process."/>

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Choice **5 A**

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

Short Response

Explanation GENERAL COMMENT - Q5A lies at the heart of what should be the purpose of CityPlan2030 to identify the role and purpose of communities and the capacity for future development. Planning should enable communities to function properly and to flourish. Provision of adequate infrastructure is central to such goals. So far as housing development is concerned infrastructure seems to be seen primarily as the function of government. The current system of develop contributions does not work. Developers build houses and they make formulaic payments to local authorities for certain assessed infrastructure needs. Those payments are made at or about the time when the development is being undertaken. At best there is a time lag between payment and infrastructure appearing. The categories of payment - Health, Education and Transport - are inadequate. Infrastructure must be seen as extending to ensuring facilities for social use as eh community centres, local shopping facilities, paths, bridges and the like. Payments made to local authority are not necessarily applied to the need assessed by reference to the development giving rise to the payment. Often the community will wonder where the money goes. We believe that it is absolutely essential that new development is accompanied by sufficient appropriate infrastructure, and that if that is to be done by payments to the local authority then those payments must be transparently applied to the assessed need. Better however if developers were required undertake the infrastructure development themselves, as eg roads, water and sewerage and street lighting at present. We do not think that promises of infrastructure being provided after the event, of in effect retrofitting, are good enough. Infrastructure must be in place at the point at which development is operational even if not yet complete. Retrofitting is, of course, often a necessary measure given the appalling record to date of providing appropriate infrastructure to cater for existing developments. **BALERNO AND INFRASTRUCTURE** Balerno has developed rapidly since the 1970's with very significant new housing development especially on and north of the Lanark Road West over the last twenty years or thereby, in the Newmills, Currievale and Cherry Tree areas, and in the Ravelrig Hill, Park and Gait etc areas. There was no discernible infrastructural development accompanying any of those developments. The current Newmills and Ravelrig Road developments similarly have had no parallel infrastructural development. The developments on and north of the Lanark Road West have virtually no connectivity to the village centre including to the High School and Primary School. They have grossly inadequate public transport provision verging on deprivation. Public transport provision to and from Balerno is lamentable with a single bus route to and from the City Centre. There are no public transport facilities to the north, south or west of the village. Balerno as a whole ranks 2 on the SIMD scale for access where 1 represents total deprivation. That in itself is an absolute scandal and an indictment of a complete absence of planning vision. Balerno currently has completely inadequate community and public meeting facilities. There is in effect no public community hall capable of hosting a gathering of 300 which is the minimum level to be expected in a community of over 6000. The Balerno Community Centre was former small supermarket. It was not designed for community use. It is substantially taken up during week days by essential playgroup / nursery activities. In any event its accommodation is quite unsuited to community centre use. **Education infrastructure** – In the modern age schools are the hubs around which communities are built. Having had its Community High School status effectively withdrawn Balerno High School no longer provides adult education opportunities. Since leisure services provision was taken over by Edinburgh

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Leisure the availability of facilities has reduced and management has been less than adequate. Healthcare infrastructure – There is no doctors surgery in Balerno. A diet bus service to Livingston StJohns Hospital was abruptly withdrawn in 2016 without notice. Public transport travel time to hospital has increased to @1.5hrs each way; elderly people without access to own transport are declining or missing appointments. While there are sheltered housing complexes the warden provision has been reduced very significantly. Transport infrastructure – Public transport provision to and from Balerno is lamentable. There is a single bus route which runs to and from the City Centre. There are no public transport facilities to the north, south or west of the village. Balerno as a whole ranks 2 on the SIMD scale for access. There is no internal public transport within Balerno beyond the circular route of the 44 bus within the south west corner of the village. Glenbrook has no access to public transport within @1.5 miles. A new service 63 may start on a pilot basis at some point in 2020. This will provide some connect between Balerno and Hermiston Gait/Gyle area of the city, and possibly a better interchange with other services west (possibly including to Livingston St Johns) and into the city. Its success will depend on timetabling and co-ordination with other transport options. Infrastructure maintenance is poor. It took literally years to get rural roads looked after. CEC operated a peculiar formula which seemed permanently to relegate rural roads to a position in which they could never be repaired. That seems to have been if not corrected then at least mitigated in the past two years, but the underlying problem of neglect remains. Th 'Green Bridge' - footbridge over the Bavelaw Burn was closed off by CEC in 2016 and CEC refuse to remove it thereby preventing community action to secure its replacement. CEC are viewed as obstructive rather than facilitative in this. Rural footpaths, useful for exercise and mental health cannot be developed for community benefit because of that. Developer contributions must be enhanced and extended beyond Education, Health and Transport to include social infrastructure. As noted above Balerno has expanded over the decades; it has little social provision outside of the High School the opening hours for which are unsatisfactory. There is a dearth of premises for short term social event or business lets. The Community Centre is grossly inadequate for the overall needs of a community nearing 7000 people. Our rural paths network is not maintained. CONCLUSION City Plan 2030 must be developed on the basis that the interests of the community are at the centre of discussion and of decisions. Balerno knows that as far as CEC is concerned it is viewed as at the end of the line and out on a limb. We consider that we are immensely fortunate to live in a place midway between town and country. We believe that smaller communities will be the future, and that Local Place Plans may help to secure that. But as long as CEC think only of the City Centre we cannot have confidence that the real needs of communities wherever they are will be taken seriously.

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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: No

Explanation
We agree that new Community Facilities must be well connected to active travel routes and invocations with high accessibility to good sustainable public transport services. In agreeing with that proposition however we qualify that by saying that this cannot be a recipe simply for building where there are such routes and connections already. If that were the case then only those areas with good connections cold possibly grow new facilities; good connections must be made to suit new facilities. Therefore we answer no to the question as put. As pointed out above Balerno is almost a desert when it comes to community facilities. There is no GP surgery in the community, our High School no longer offers the community facilities which it did, there is no community centre other than in name. Without facilities in the community then the residents are bound to have to travel to find them. Connectivity is essential. While public transport services must be sustainable, all communities and parts of communities, including hamlets, have to have reasonable connection to public transport.

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Choice 5 C

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

Short Response:

Explanation We emphatically agree that community services should be located close to the communities they serve, supporting a high walk-in population and reducing the need to travel. In part the question begs the point as to what is included in community services; if the answer is Education and Healthcare as well as Library and public authority availability then the following points are relevant. The population of Balerno is between 6000 and 7000. There is no local authority office in Balerno apart from the Library which has restricted opening hours. The Edinburgh Council Locality office is at West Side Plaza Wester Hailes, a minimum of 4.3 miles from Balerno Main Street and, if access to it, travelling by public transport, involves two buses with a travel time minimum of about 44 minutes. Currently Balerno has no medical surgery with for the most part Balerno patients travelling to Currie, a distance of up to 4 miles for some Balerno (Glenbrook) residents. The referral hospital for Balerno is St John's Livingston, a distance of 11 miles from some parts of Balerno taking about 1hr 30 mins by public transport. See also 5A above.

Choice 5 D1

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

Short Response:

Explanation We emphatically agree that development should be expected to contribute toward new or expanded community infrastructure. The system of S75 agreements is no longer apt to address the real problems of development. It does not really address even education and transport provision which is supposedly currently covered. There needs to be more investment by developers in assisting in integration across the whole community. Provision of community halls, repair and replacement of the Green Bridge etc should all be within scope. See also 5A above

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Choice 5 D2

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

Short Response:

Explanation
We agree but only reluctantly. We appreciate the benefit of cumulative contribution zones. The problem arises when communities feel not only that they have seen no benefit from successive developments, but also that funds that they might have expected to applied for their benefit are being applied for the benefit of other apparently unrelated areas. For example successive developments on the Water of Leith corridor have seen transport related s75 payments ascribed to improvement of traffic light systems at Gillespie Crossroads. At the same time there is still no safe crossing of Lanark Road West between Somerville Road and Curriehill Road, a distance of just about one mile. Or, in the case of education, contributions expressed in terms of classrooms result in temporary huts with the contribution apparently being assigned to a completely different area. We know that difficult choices have to be made, but at present there is no effective communication on contribution policies.

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
In principle, yes. Developer contributions should be transparent as to amount, purpose and terms. That argues for terms which are more than simply guidance. It is also important that there is certainty both for developers and as importantly for communities; they need to know what they can expect and what benefit they can expect. Ideally however the future of developer contributions is for a far more prescriptive regime.

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Choice 6 A

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

Short Response:

Explanation: In principle, yes. This sounds as though it's a return to something like the 800mtrs to nearest bus stop rule which CEC binned not so long ago. That clearly hadn't worked, but binning it simply accentuated that developers were in effect in charge.

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: In principle, yes. However, for many people reasonable access to public transport is likely to remain highly unlikely. For instance for Glenbrook, Balerno residents to access public transport involves a journey of about 1.5miles. Large swathes of Balerno are outside the 800mtrs standard which CEC used to apply for distance between a new housing development and the nearest bus stop. In any event local parking provision in Balerno is inadequate to support the emerging commuter use which is reducing the facility so far as local shopping is concerned. For places like Balerno there will still be a need for more parking whether we like it or not.

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Choice **7 A**

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

Short Response

Explanation In principle, yes. But with serious reservations about practicalities; and again serious doubts about whether this type of thinking can be applied in the semi rural setting. There is a clear difference between development in the semi rural environment of Balerno and the urban setting of say Morningside where public transport choices are greater. Setting of targets will also require a process in which the public can have confidence. There is unlikely to be radical change to a walking or cycling culture in the absence of improvements in safety provision; few people would wish to cycle on the Lanark Road West and certainly not to and from the city centre, and even fewer in the rush hour in winter. Parts of LRW do not have any pavement provision. Many of our pavements are narrow - as eg Harlaw Road - and surfaces are broken up. Even if they did elect to cycle, without a secure compound for parking bicycles few people will wish to risk their bike being stolen. Cycling out of the City to Balerno is not for the faint hearted. The only real alternative cycling route to Edinburgh involves the Water of Leith Pathway where cyclists are in competition with pedestrians which is not always an easy relationship; the WoL Pathway is not lit making its use in winter doubtfully safe. The WoL pants not surfaced and is therefore less suitable for cycling in any event. Equally, few people look forward to standing on a bus for an hour, especially when the bus is rendered unstable by the state of the roads. In other words setting targets for active or public transport travel will involve serious investment.

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 In principle, yes. However once again the policy objective is City Centre focussed. Transport infrastructure for semi-rural locations will have to be very considerably enhanced if the city centre is to be accessible. This will involve improved timetabling and introducing extended hours of operation. It will also involve development of safer cycle routes and destination storage facilities; many cyclists will not use the A70.

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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 In principle, yes. However there may be a tendency to control demand before infrastructure improvements have been introduced. In any event see also 7B above. It all depends whether you want to kill off the city centre so far as residents from suburbs and semi rural areas access is concerned. In any event a preferential tariff for electric cars is a regressive tax solution. If electric cars were cheaper everyone would buy one, and fairly soon they will have, and you'll be back at the start so far as controlling private vehicle access is concerned.

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 In principle, yes. We have noted that, in the City Mobility Plan, the A70 alone amongst the arterial roads into Edinburgh, had no statistical indication of traffic volume or pollution risks. Equally there was no identification of Balerno in City Mobility Plan maps. This does not fill us with confidence that Balerno's or the Water of Leith Valley's interests are recognised far less understood. New Park and Ride provision is essential on the A70 along with radical rethinking of bypass provision for the Water of Leith traffic corridor. We may need more research in order to assess whether traffic levels on the Lanark Road West are materially added to by traffic from West Lothian and Lanarkshire. P&R facilities at Hermistpn Gait might help relieve LRW congestion.

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Choice **8 A**

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

Short Response

Explanation

In principle, yes. We should be encouraging walking and cycling, not simply as a transport to work consideration, but for general health and well-being.

Walking and cycling routes must be safe for all users. There will be differences according to use. Recreational use will not have the same requirements as travel to work and school routes. Surface maintenance and lighting requirements are likely to differ. A cycle route connecting the schools and colleges of the Water of Leith corridor might encourage more cycling to local schools traffic. It might also facilitate more curriculum sharing across schools.

Developing the Water of Leith path as a lit and surfaced pathway and cycleway could reduce traffic on LRW by encouraging cycle transit into and from the City. Better regulation of cycling behaviour, including speed limits, would be essential. Cycle routes to Curriehill station along the WoL path and through Newmills / Currievale coupled with secure cycle storage would relieve pressure on LRW, and increase use of Curriehill Station. In passing it is interesting that you want new cross boundary cycle routes but our most recent experience of cross boundary routes is closure of a bus route. In 2017 a Scottish Government minister told us that the Government had no policy on cross boundary services. More joined-up thinking is required across the whole spectrum of cross boundary provision. We agree that new walking and cycling links around the city be developed. Start with Balerno please where our village connectivity has been ignored by planners for generations; our paths have been left to decay and be blocked off by landowners. Our cross routes are non-existent and our Green Bridge has been closed by the City Council and left to rot. Public Transport interchanges are vital for future public transport development. Our nearest public transport interchange is Haymarket Station some 8 miles away.

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

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Choice **8 C**

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

Short Response

Explanation There is nothing in the list under 8B for the SW Edinburgh area. What about the safe pathway to the Pentland Hills? The A70 corridor seems once again to be entirely ignored. There is no comment box for 8B and so we have therefore to reject the list as irrelevant and inadequate. On 8C our view is in principle to agree. On cycle ways - Cycle ways can be dangerous for pedestrians with speed of bikes well in excess of 30mph especially on downhill and level stretches. But assuming you also intend to ensure segregation of pedestrian and cycle routes then what about linking the 75 route to the Livingston / West Edinburgh super highway? And if you want people to use it to commute then you will have to light it and surface it, and you have absolutely to resolve the problems of pedestrians/wheelchairs/buggies sharing the space with speeding cycles. We have not produced a map for eg the Pathway to the Pentlands simply because the route is not yet settled. But that it is becoming essential is evidenced by the fact that the car parks at Harlaw and Hreipmuir irregularly overflowing causing difficulties for traffic on narrow roads and in particular for the farming community who are able to access their fields. The safe path to the Pentlands is a real and current road safety and local economy issue.

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

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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

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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

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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 In principle, yes. Recent planning approvals in Balerno and along the Water of Leith Valley have been for high value housing. Affordable housing appears to be treated as a grudging concession rather than being integrated across the developments as a whole. Increasing the proportion should lead to this problem being addressed. If anything 35% if on the low side. There is also an existing need for a more mixed housing approach with smaller retirement type houses and flats in addition to 'starter' homes, and also for 'sheltered' housing.

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 In principle, yes, although we are against and do not agree with a prescriptive approach. We agree that affordable housing should be tenure blind and should be a representative mix of the housing types etc which make up the development. We also agree that all private and/or rented residential accommodation of more than 12 units should be expected to make an onsite affordable housing contribution, and all relevant developments should also be expected to meet Housing for Varying Needs standards.

Customer Ref: 01358 Response Ref: ANON-KU2U-GWG6-2
Name: Richard M henderson
Response Type: Community Council
On behalf of: Balerno Community Council

Supporting Info: Yes

Email: [REDACTED]

Choice 12 A

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

Short Response: Option 1 (Council/

Explanation: We do not understand Edinburgh Council to be arguing that it is necessary to use Greenbelt land to meet housing land targets. We would not support the use of Green Belt land. We therefore support Option 1 - new homes to be delivered by the Council and its partners within the Urban Area.

Choice 12 B1

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

Short Response: Not Answered

Explanation:

Choice 12 B2

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

Short Response: Not Answered

Explanation:

Customer Ref:

01358

Response Ref:

ANON-KU2U-GWG6-2

Supporting Info

Yes

Name

Richard M henderson

Email

Response Type

Community Council

On behalf of:

Balerno Community Council

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

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

Customer Ref: 01358 Response Ref: ANON-KU2U-GWG6-2
Name: Richard M henderson
Response Type: Community Council
On behalf of: Balerno Community Council

Supporting Info: Yes

Email: [REDACTED]

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

Choice 12 B8

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

Short Response: Not Answered

Explanation

Customer Ref: 01358 Response Ref: ANON-KU2U-GWG6-2
Name: Richard M henderson
Response Type: Community Council
On behalf of: Balerno Community Council

Supporting Info: Yes

Email: [REDACTED]

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: Yes

Explanation

Choice 12 B10

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

Short Response: Not Answered

Explanation

Customer Ref: 01358 Response Ref: ANON-KU2U-GWG6-2
Name: Richard M henderson
Response Type: Community Council
On behalf of: Balerno Community Council

Supporting Info: Yes

Email: [REDACTED]

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: In principle we would be concerned about any developments which impacted on the A70 and the Water of Leith corridor. We therefore do not support East of Riccarton. In any event since we support Option 1 it follows that we do not support Option 2. Further in relation to East of Riccarton we assume residences at minimum average 65 units per hectare and 100 units/hectare in specified areas; community, local centre, new schools, businesses and industrial land. These buildings could well be in the range of 4-8 storeys, would be unlikely to be in keeping with current settlements and might set a precedent for the almost inevitable erosion of further prime quality agricultural land to the west. Re 12C and D - We have no sites to suggest in response together 12C or 12D.

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:

01358

Response Ref:

ANON-KU2U-GWG6-2

Supporting Info

Yes

Name

Richard M henderson

Email

Response Type

Community Council

On behalf of:

Balerno Community Council

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 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

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

Supporting Info

Email

Choice 13 A

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

Short Response

Explanation In general terms, yes. CEC suggest that this will be support for projects and actions arising from the transformation of the City Centre:
o COMMENT – this is another example of support for the City Centre while what is needed is support for local communities.
Edinburgh’s festivals and cultural offering across the city
o COMMENT – again this is simply support for the centre rather for local communities.
• Development associated with our universities and colleges that relates to innovation and learning.
o COMMENT – we agree.
The Edinburgh BioQuarter
o COMMENT – We agree
West Edinburgh (see also Choice 14)
o COMMENT – We think that concentration on West Edinburgh development risks sprawl and a spread of brownfield sites.

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 We do not agree an area of search approach. The purpose of the plan should be to provide some degree of certainty. An area of search approach provides no certainty beyond continuing uncertainty which would give rise to blight. We feel the proposed approach risks encouraging more inner city dereliction, and the using up agricultural land; and therefore we cannot agree the approach.

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

Supporting Info

Email

Choice 14 B

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

Short Response

Explanation

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:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Supporting Info

Email

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

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

Supporting Info

Email

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

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

Supporting Info

Email

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

Customer Ref: 01358 Response Ref: ANON-KU2U-GWG6-2
Name: Richard M henderson
Response Type: Community Council
On behalf of: Balerno Community Council

Supporting Info: Yes

Email: [REDACTED]

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: [REDACTED]

Explanation: [REDACTED]

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: Yes

Explanation: In principle, yes.

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: I support a loss of

Explanation: In principle yes. Development of serviced office accommodation is likely to feature in small communities as in the Water of Leith corridor

Customer Ref:

01358

Response Ref:

ANON-KU2U-GWG6-2

Supporting Info

Yes

Name

Richard M henderson

Email

Response Type

Community Council

On behalf of:

Balerno Community Council

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

Not Answered

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

Not Answered

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

Not Answered

Explanation

Customer Ref:

01358

Response Ref:

ANON-KU2U-GWG6-2

Supporting Info

Yes

Name

Richard M henderson

Email

Response Type

Community Council

On behalf of:

Balerno Community Council

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

Not Answered

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

Not Answered

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

Not Answered

Explanation

Customer Ref: Response Ref:
Name
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

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

Customer Ref:

01358

Response Ref:

ANON-KU2U-GWG6-2

Supporting Info

Yes

Name

Richard M henderson

Email

Response Type

Community Council

On behalf of:

Balerno Community Council

[REDACTED]

Balerno
Community
Council



CityPlan Team
The City of Edinburgh Council,
G.3 Waverley Court,
4 East Market Street,
Edinburgh,
EH8 8BG

By e-mail - cityplan2030@edinburgh.gov.uk

25 April 2020

Dear Sirs,

**Choices for CityPlan2030
Response by Balerno Community Council**

This letter sets out the comments of Balerno Community Council (the Council) in relation to City of Edinburgh Council's Choices for CityPlan2030 consultation. It should be read along with the comments submitted by the Council on-line; reference ANON-KU2U-GWG6-2

The consultation opened on 31 January and will now close on 30 April having been extended by one month in view of the Covid-19 outbreak.

The Consultation has not been amended other than in terms of the period for response. In particular it has not been amended with reference to any change in circumstances envisaged as arising from the Covid-19 outbreak.

For the reasons set out below the Council considers that the consultation should be suspended pending the UK and Scottish Governments setting a date by which they would expect that current emergency restrictions will be removed.

Impact of Covid-19

This Council has no more idea than anyone else as to the precise impacts which will follow from the current Covid-19 outbreak. It is unrealistic to suppose that the Covid-19 outbreak will have no long-term impacts on Edinburgh.

The Fraser of Allander Institute [1] has estimated that so far as Scotland is concerned the construction sector could contract by 40-50%, production by 25-30%, services by 15-20% and that Scottish GDP could contract by about 20-25% overall. Services are said to be by far the largest part of the Scottish economy. It has been suggested that they will take a hit in retail and wholesale, transport and storage, and accommodation and food services, with the majority of the latter sector currently mothballed. But there could be a "modest expansion" in the public sector and a "fairly modest" contraction in real estate. The agricultural sector is predicted to grow by 2-5%, though even a 5% growth in this sector would add less than +0.1 to overall Scottish GDP.

Commentators suggest that social habits and practices will be fundamentally altered as a result of the outbreak. It could take a considerable period of time before people might wish to re-adopt old patterns



of living and commuting. Home working may well become a preferred option leading to less pressure on transport to city centres and correspondingly less pressure on housing development in South East Scotland focussing on Edinburgh.

If that analysis is reasonable then to align transport and development policies for the next ten years to pre Covid-19 assumptions would be unwise. At the very least we should be arguing for a modification of the ten year planning perspective and looking at shorter periods for Local Plans as we emerge from Covid-19.

Planning for future development and transport provision for the next ten years in the current state of uncertainty will more resemble crystal ball gazing than anything else; it is simply not possible to conjecture with any degree of certainty what the state of the economy or of society is likely to be in one year's time far less ten.

In the circumstances the Council believes that preparation of CityPlan2030 should be suspended pending the conclusion of the current Covid-19 outbreak. If suspension required the continuation of the LDP then modifications of that would be necessary in particular in relation to issues of adequacy of housing land supply.

If for any reason the City were to consider that suspension of the CityPlan2030 process is at present impossible then the Council believes that a further period of consultation will be necessary to allow consideration of any provisional conclusions in advance of the City formulating its proposals.

The Council's observations on the specific issues raised in the on-line CityPlan2030 consultation as published have been submitted on-line but are set out below along with more general observations on the issues raised.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Richard M Henderson".

Richard M Henderson
Chair, Balerno Community Council

Cc Cllrs Graeme Bruce, Neil Gardiner, Ricky Henderson and Susan Webber; Ian Hynd (BCC) Tony Allen (BCC), Hugh Watt (BCC)



**ANNEX A – Choices for CityPlan2030
Response by Balerno Community Council**

General Comments

Choices for CityPlan2030 (Choices) is one of two linked documents, the other being City Mobility Plan which together will set the context for the development planning strategy in the city to succeed the 2016 Local Development Plan (the 2016 Plan).

Both Choices and City Mobility Plan are set at a high level. They do not, at this stage, set out detail down to the level of our community. This narrative response addresses some detail issues to illustrate the issues of concern for the Council.

NOTE – The comments in this Annex do not take account of any probable impacts of the current Covid-19 outbreak.

These comments consider matters under the following headings;

1. An overview of Balerno; and
2. General comments on CityPlan2030 process and approach

An overview of Balerno

Location – Balerno is a historic village with conservation area. It is at the same time a growing community with significant house building currently being carried on at Newmills (Kingfisher Park) (@206 units) and Ravelrig (Ravelrig Heights) (@120units). The village is situated at the south western extremity of the City at @540ft to 600ft altitude, on the northern slopes of the Pentland Hills.

Balerno identifies as a strong community feeling, with a good sense of neighbourhood. While in employment terms most opportunity is outside of the village, and therefore it is in a sense a commuter suburb of Edinburgh, that does not disable the overall sense of living in an identifiable community. The fabric of the community has however been put under strain by the scale and rate of recent expansion coupled to absence of investment in public infrastructure over much of the past thirty years or so.

Balerno's western boundary abuts on to Kirknewton, 5 miles away. Its southern boundary is with Penicuik and Midlothian on the northern flanks of the Pentland Hills while to the north is Ratho, again 5 miles distant. Balerno's eastern boundary is with Currie and its focus, for employment, commerce and leisure tends to be to the east, to Edinburgh city centre 8 miles away along the continuously built up A70 Lanark Road West. East is the only direction in which travel by public transport is possible, which means that there is a public transport barrier to accessing the public, and particularly hospital, facilities provided by Livingston only 7miles away. Balerno residents work across the whole of Edinburgh and its hinterland, including, its centre, its northern and southern sectors, as well as to the east and west.

Population – Balerno's population was noted at 6031in 2001. The Balerno boundary was moved in 2017 on the introduction of multi member City Council constituencies, leading in our estimate to the transfer of some 1200 residents to the Currie CC area. On that basis the figure for 2007 might have been @4900.

Commented [AA1]: Should this be 2017 ?



Estimates vary and are difficult given changes in boundaries and the vagaries of census districts. However, the ONS 2014 Mid-Year Estimate suggested a population of 5915, while the 2011 census figure is 5927. We estimate that since 2014 the population may have increased by <@1000 given housing developments at Ravelrig and Newmills.

Within the population the over 65's cohort, at 16.9%, is higher than the Edinburgh average of 12.%. There are no community facilities for elderly to meet together in Balerno other than the St Joseph's Centre, part of Balerno Parish Church.

Surgery – While Balerno does host a dental practice, the local medical surgery is in Currie, close to the bus route, but @3miles from the Balerno bus terminus; much of Balerno is situated more than 0.5 miles from the nearest bus stop.

Infrastructure – Balerno hosts two inns, two carry out food outlets, one bistro/café and one community café.

There are some commercial/industrial enterprises including two small supermarkets and one small hardware store. There are three hairdressers and one nail bar. While there are a number of locally based building and service trades, we do not have any detailed information on numbers. There are two garages. The Post Office is located with the bistro as a Post Office Local model. Main Street, Balerno is designated as a Local Centre in the 2016 Local Development Plan. The Library is located in Main Street. The public counter at the Police Station was closed in 2016.

Education, youth provision & social clubs – Balerno hosts Balerno High School and Dean Park Primary School both of which currently require serious investment. The High School feeder primaries apart from DPPS are Ratho PS and Kirknewton PS. There are three of four nurseries/playgroups and at least two after school and breakfast clubs.

Having in the past had a thriving and extensive programme, there is now little or no formal adult education provision in Balerno.

Balerno Bowling Club and Balerno Tennis Club are located in the middle of the village as is Currie Rugby Football Club (Currie Chieftains). All of which provide social facilities. Currie RFC has a youth operation catering for over 280 young players.

The Scout Group occupies the Scout Hall and provides activities for over 250 young people.

2 General comment on the CityPlan2030 process and approach

These comments supplement Balerno Community Council's responses to the CityPlan2030 questionnaire.

There is too great focus in the process on the City Centre

The draft CityPlan 2030 does not impact on Balerno as much as it does on some areas, but the Community Council believe that the Choices document fails to address the fall-out from earlier plans. The Plan is heavily focused on Edinburgh's city centre or at least its inner core. While the reasons for this may be discernible the approach tends to reduce the fullest consideration of the issues which affect the periphery of the city, and it undermines the 'one place' concept that is fundamental to achieving a thriving and successful Edinburgh city region.

Whilst we see logic in the development of central Edinburgh as a regional resource, the hub and spoke model underpinning the CityPlan 2030 is unsustainable in a low-carbon context, unless it is coupled

with a planned creation of networks of village communities that are themselves self-sustaining in the provision of community resources.

Over the past ten years or so there has been substantial expansion in housebuilding across Edinburgh. Driven by the requirements of SESPlan and the associated Supplementary Guidance this has led to a need for a constant supply of housing land. The result was that planning permissions, not all of which had been anticipated in the Local Development Plan, distorted community planning, and brought the planning system into discredit. We believe it has resulted in an over rapid and over concentrated expansion of our community, and that has led to serious stresses on the local infrastructure, which need to be addressed

CEC and government have fundamentally failed to ensure and maintain necessary infrastructure

The communities of the Upper Water of Leith Valley have warned for years of the need for infrastructure development to match increasing housing provision and the resulting strain on local facilities and resources. Housing development has been allowed by government with insufficient regard to the impact on host communities, while at the same time services to those communities have been cut

Thus, for example;

- I. *Medical services* - There is no medical surgery in Balerno despite the population increase from some 400 new houses over the past five years. Associated with that there is no bus service for a significant proportion of residents who live some distance from the 44 bus route, in particular in the Ravelrig, Newmills/Curriehill Castle and Harlaw Road areas.
- II. *Pathways and connectivity with the village* - There is no path network for pedestrian connectivity between housing developments at Ravelrig Hill, Park and Gait, meaning that pedestrians are forced to walk on a narrow pavement along the length of the busy and dangerous Lanark Road West, to Bridge Road, at which point pavements are clearly inadequate. Nor does CEC appear to have made any effort to support local demands to secure upgrading of paths through the Ravelrig Estate, which could provide a safe route to school and village facilities. We cannot overemphasize that having a properly designed and properly maintained paths network is central to the successful functioning of any community.
- III. *Traffic and the A70* - The A70 is the sole transport corridor connecting the Water of Leith communities and it has become massively congested. Until 2016 the then local plan, the Rural South West Edinburgh Local Plan had included provision for construction of a relief road bypassing Balerno. The opportunity for that was however lost when the route at Ravelrig/Pilmuir was given up for housing development. It is inexplicable that what was seen as necessary when RWELP was formulated is now dismissed despite traffic volumes increasing.
- IV. *Public transport deficit* - The Balerno bus service to Livingston St John's Hospital was withdrawn in 2016 depriving residents of access to an essential service. There are no bus services within Balerno, apart from the 44 route on which the number of bus services has recently been reduced. Now CEC also wish to cut the number of bus stops allocated to the community, further reducing ease of access to the service
- V. *No community halls or facilities* - Balerno's population has increased over the past ten years by an estimated 2500 people or more, yet there is no community hall or community centre other than a former Scotmid store which houses an essential service – a nursery – but is wholly inadequate for the community's needs
- VI. *Little lateral thinking in assessing opportunities for use of public buildings* - Balerno's Police Station effectively closed as a public resource in 2016. There did not appear to be any thought to developing the building as a shared community resource, suggesting an absence of joined up or cross cutting imagination in policy thinking.



- VII. *General removal of community facilities* - The loss of Community High School status for Balerno High School led to the decimation of adult education provision and the loss of a community hub. Balerno is determined to be an active community but the lack of basic support by CEC for rudimentary resources is a serious challenge.
- VIII. *Deficit in open space* - Balerno is underprovided with greenspace/amenity or open space, having only a single community park at Marchbank Park part of which CEC has recently sold off, without any consultation with the community. There is a small amount of green space access at Malleny Park, which is mainly a sports facility, while the Malleny area around the park offers substantial opportunities for development as community greenspace.
- IX. *Lack of public toilet access* - While CEC is known to have effectively withdrawn from public toilet provision, it is still surprising that a community at the Gateway to the Pentlands Regional Park merits no public toilet provision apart from one single convenience at Harlaw Reservoir. Nor does CEC appear to have taken any steps to encourage take up of its Community Toilets Scheme.

There are other examples which can be given of the failure of government properly to ensure that infrastructure was maintained to match developing community demands including in particular those which have arisen from new housing.

Planning process must better assess impact of development on communities

The overall sense we have is of an endemic failure on the part of the City and of government in general to assess, far less make provision for, the community impact of the developments which have been approved in recent years. From transport to roads to health to education, services have been reduced or removed.

So far as locations such as Balerno are concerned, it is easy to conclude that government relies on the community stepping up to the plate and ensuring shortfalls in provision will be made up by voluntary effort. If so, community action ought to be supported by the allocation of public resources. More likely we believe, is that planners may not now have the time to plan properly and that assessment of community impact may be a dispensable luxury.

Developers must be required to make more realistic contributions to infrastructure and to mitigate impact on communities

There seems to be a clear preference on the part of the City and of government in general to avoid demanding anything of developers when granting permission for changes which will alter irremediably the character and viability of communities. Because the community has not seen benefits flowing from large scale housing development it is unlikely to believe that s75 agreements work for the benefit of communities. The suspicion is that money levied because of local developments is allocated by CEC to other places. That is a corrosive situation which calls for a more transparent accounting by government to the community, and also for a far more robust approach to be taken with housing developers; they must integrate their developments into the community and also enhance the communities in which they are located.

Edinburgh Council and government at large must be much more transparent

There is a deep suspicion that resources accruing in this area to the City via the s 75 route are invested away from the Upper Water of Leith Valley communities. Whether that is the case or not is in a sense irrelevant. If there is an *apparent* disparity of infrastructure provision simply because communities do not see benefits accruing to them, the resulting sense of unfairness is corrosive of a good relationship between government and community.

Edinburgh Council must take seriously the position of outlying areas



While we appreciate the work that has gone into the CityPlan2030 draft, our experience is not such that we have great confidence that Balerno will be a significant focus so far as the development or implementation of the plan is concerned. Rather our experience is that we have to fight to get anything done for the benefit of the community – and that is not the way things should be.

While we understand that the plan does not suggest more housing development for Balerno we are concerned that the infrastructure which should have been put in place to cater for the existing situation has simply not been addressed. For example, we have suggested in the past the need for a proper transport review to enable proper access to rail as well as bus and tram provision. Located at over 500' up on the slopes of the Pentlands it seems to come as a surprise to CEC that snow and ice are a greater problem for Balerno than for Princes Street. Local government reorganisation twenty-five years ago means that our High School still has a cross--boundary catchment area, but there are no bus connections between feeder Primary Schools and Balerno High School. Similarly, a stroke of the pen removed a bus connection between Balerno and its hospital in West Lothian. These are the sorts of things which can be avoided with proper planning and consultation with communities. Scottish Government told us in 2016 that there was no provision for cross boundary planning of services. Without that proper planning and consultation, it is small wonder that a deficit of trust in public provision is the result.

Despite all of this however, we believe in our community. We are committed to encouraging it to thrive, to be innovative and successful. Our *Community Plan*, published in March 2019 sets out what we want to see for Balerno; it may well form the basis for a Local Place Plan for Balerno.

We hope that CityPlan2030 will take account of that Plan and will engage with it as CityPlan2030 develops.

Balerno
25 April 2020