

## Edinburgh Local Development Plan – Proposed Plan Representation Form

All Representations on the Proposed Plan should be submitted using this form.  
**Please use a separate form for each individual representation i.e. each aspect of the Proposed Plan you wish to comment on.**

If you have any queries regarding your representation, please refer to the accompanying guidance note or contact 0131 469 3552

Representation forms must be received by <b>5pm on Friday 14 June 2013</b> and can be submitted electronically to; <a href="mailto:localdevelopmentplan@edinburgh.gov.uk">localdevelopmentplan@edinburgh.gov.uk</a> or by post to; Local Development Plan Team, City of Edinburgh Council, Business Centre G.3, Waverley Court, 4 East Market Street, Edinburgh, EH8 8BG.					
<b>Section 1. Please provide your contact details</b> Please note that representations cannot be treated as confidential. Representations will be made available for public inspection, except any information which would be subject to the Data Protection Act 1998.					
<b>Name:</b>  Gary Bennett (Chair)			<b>Organisation Name:</b> (if applicable) <b>CAMMO RESIDENTS ASSOCIATION</b>		
<b>Address:</b>  42 Cammo Grove, Edinburgh, EH4 8EX					
<b>Telephone:</b>  0131 339 7555			<b>Email:</b> <b>info@cammoresidentsassociation.org</b>  Please provide an email address if possible as this helps us improve efficiency		
<b>Agent:</b> N/A			If you provide an Agent's name we will direct all subsequent correspondence to your Agent		
<b>Agent Address:</b> N/A					
<b>Agent telephone:</b> N/A			<b>Agent Email:</b> N/A		
<b>Section 2. Please tell us which part or parts of the Proposed Plan this representation relates to:</b>					
Page No.		Part and Section		Paragraph No.	
Proposal Reference	HSG (20)		Policy Reference	Policy Des 3 Policy Des 9 Policy Env 18	
Other					

**Section 3. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written**

Seeking a change            X             (Please complete sections 4 and 5 below)

Support as written                        (Please complete section 5 below)

**Section 4. Please indicate what changes you would like made to the Proposed Plan**

Amendment to Table 4 New Housing Proposals of the LDP to remove Cammo (site HSG 20) from the list of sites in West Edinburgh.

Removal of Cammo from the Maybury and Cammo Site Brief, included in the LDP (p. 50).

**Section 5. Representation**

Your representation should be no more than 2000 words. You should explain clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. If you are attaching additional documents as part of your representation you must refer to these in this section of the form and include a summary of their content. Representations which simply state "see attached" or similar will not be accepted and will be returned.

This representation will concisely prove that due to the issue of biodiversity the site in Cammo, West of Maybury Road, should be removed from the Proposed Local Development Plan.

**SESplan**

There are multiple sections of SESplan which provide a means of supporting the conservation of biodiversity.

Paragraph 17 of the SESplan which was published in November 2011, states that SESplan aims to:-

*"Promote green networks including through increasing woodland planting to increase competitiveness, enhance biodiversity and create more attractive, healthy places to live."*

This aim adds weight to our argument that the Cammo fields current status as both a Greenfield site and a green belt site, which is supposedly protected against development, require them to be removed from the PLDP.

The SESplan also highlights in paragraph 2 that regard should be given to - The Scottish Biodiversity Strategy (SBS). Although this Strategy is currently under review due to changes in European legislation, according to the Scottish Government website this Strategy is still used. It cannot be ignored that the main aims will always include conserving natural environments and protecting habitats where creatures make their homes. If true regard were given to this strategy then the Cammo site would not be

proposed for the development of 500-700 new houses.

### **Local Development Plan Policy**

The Local development plan consistently enforces the need to maintain and protect biodiversity.

The most forceful sections of the Local Development plan in regards to biodiversity are;

- *“Policy Des3 Development Design – Incorporating and Enhancing Existing and Potential Features Planning permission will be granted for development where it is demonstrated that existing characteristics and features worthy of retention on the site and in the surrounding area, have been identified, incorporated and enhanced through its design...structures, archaeology, trees and woodland, landscape character, views and biodiversity can enhance a development’s sense of place and contribution to the wider habitat and green network. Where practicable, proposals should provide new habitat to further the conservation of biodiversity.”*

Our concerns are, firstly, Cammo Tower will not be retained as a view from those currently living in Cammo, but 'glimpses' will instead be classed as sufficient to outweigh the fact that they will be blocked out from their views of natural beauty. This is not sufficient. Additionally, the current green open field is a home to many species of animal life, and a place which, despite being within walking distance of homes, has been allowed to dedicate itself completely to the wildlife. This is one of the reasons why Cammo Walk is such a popular dog/nature walk.

- *“Policy Des 9 Urban Edge Development Planning permission will only be granted for development on sites at the green belt boundary where it:*

*a) conserves and enhances the landscape setting and special character of the city*

...

*c. includes landscape improvement proposals that will strengthen the green belt boundary, improve amenity and enhance biodiversity.”*

In our view this development will be entirely detrimental to the landscape of the area and will weaken the greenbelt boundary, while destroying the areas biodiversity, therefore planning permission should not be granted on this site.

- *“Policy Env 18 Open Space Protection Proposals involving the loss of open space will not be permitted unless it is demonstrated that:*

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

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

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

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

*e) the development is for a community purpose and the benefits to the local community outweigh the loss.... The Council will only support development on open space in exceptional circumstances..."*

The Council have shown no 'exceptional circumstances' from what can be seen in the Proposed plan, it is therefore baffling why they seem to continue to support this development.

The existing Edinburgh and Lothians Structure Plan also has several sections directly applicable to this objection because of the way the LDP clearly goes against the aims of the Plan.

*"2.14 The structure plan's objectives are to: ...*

*- protect the natural environment from inappropriate or damaging development".*

### **Implications for Cammo**

There are many negative effects which the development would have on the biodiversity of the area, although as there is a word limit on representations only a few can be argued.

Page 11 of the Habitat Appraisal states that in the area of HSG 20 there are 4 species of birds which may occupy the area and therefore may be affected by the potential development. These are Curlew, Oystercatcher, Redshank and Lapwing. The continuance of these plans will result in an adverse effect for the population bird species. Even though the report claims this development will have a minor residual effect on these species of birds in the Cammo area, it must be taken into account that first the birds would have to maintain living in the area throughout the next 10 years, while the stages of building are completed. It must be questioned if there would be any birds still in the area after that extensive disturbance has ended.

Furthermore, the Habitat Appraisal lists HSG 20 development as having a 'minor residual' effect which will have little impact on the conservation of the area. It is difficult to understand why a site already classed as having the potential to disrupt 4 species of birds habitat and destroying an open green field, potentially disrupting many animals and the overall biodiversity of the area is stated to be minor.

Finally, this development would also increase the use of cars in the surrounding area. This is mainly a transport issue but also has an impact on the environment due to the increase in emissions. On inspection of the Proposed Local Development Plan it is clear that there are no plans to introduce any bus routes within the proposed Cammo

area. This means that for those located in the development, there would be a long walk to the nearest bus stop, vastly increasing the likelihood that they will decide to drive.

### **Scottish Planning Policy**

Scottish Planning Policy, Paragraph 37;

*“Decision making in the planning system should: ...*

- *protect and enhance the cultural heritage,*
- *protect and enhance the natural environment, including biodiversity and the landscape,*
- *maintain, enhance and promote access to open space and recreation opportunities”.*

All three of these aims of protection within the planning system seem to have been disregarded in terms of deciding that Cammo is a suitable site for the creation of 500-700 new houses.

Paragraph 126 of SPP states;

*“Planning authorities should take a broader approach to landscape and natural heritage than just conserving designated or protected sites and species, taking into account the ecosystems and natural processes in their area. A strategic approach to natural heritage in which wildlife sites and corridors, landscape features, watercourses, and areas of open space are linked together in integrated habitat networks can make an important contribution to the maintenance and enhancement of biodiversity and to allowing ecosystems and natural processes to adapt and respond to changes in the climate. Planning authorities should seek to prevent further fragmentation or isolation of habitats and identify opportunities to restore links which have been broken. Where possible, planning authorities should seek benefits for species and habitats from new development including the restoration of degraded habitats.”*

This paragraph clearly dictates that all natural areas, wildlife and open spaces are significant. The Cammo site encompasses almost all of the issues which are said to be taken into account in this paragraph, and it is therefore quite the opposite of this policy to decide upon a site like Cammo.

### **Conclusion**

In conclusion, if the proposed Local Development were to go ahead at the Cammo site in the West of Edinburgh then the biodiversity of that area would be damaged beyond repair and as such Edinburgh City Council will have ignored their *“duty to further the conservation of biodiversity under the Nature Conservation (Scotland) Act 2004”* as seen in paragraph 129 of SPP.

Please use a continuation sheet if required