

## 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>  <b>G. Bennett (Chair)</b>			<b>Organisation Name:</b> (if applicable)  CAMMO RESIDENTS ASSOCIATION		
<b>Address:</b>  <b>Cammo Grove, Edinburgh</b>					
<b>Telephone:</b>			<b>Email:</b> Info@cammoreResidentsAssociation.org  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>					
<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		
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. 62).

**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.

Cammo Residents Association (CRA) is concerned that housing development at Cammo cannot be supported by the existing local educational infrastructure. CRA is also concerned that the location of the site at Cammo cannot be effectively or sustainably serviced by the new primary school proposal put forward in the LDP (SCH 6), nor the proposed extension to Forrester High. CRA therefore challenges the identification of the site at Cammo (HSG 20) as a proposed New Housing Site within the Edinburgh Local Development Plan (LDP).

Underlying problems currently exist concerning the location of this site in relation to the existing and proposed educational infrastructure in the West Edinburgh area. CRA strongly believe that Cammo is an unnecessary addition to the LDP's list of New Housing Sites. The existing sites in the region, combined with the remainder of additional proposals are more than sufficient to meet the housing needs of West Edinburgh during the LDP period.

The educational capacity in West Edinburgh is currently highly pressurised, and a new primary school (proposal SCH 6) and large extension to Forrester High are proposed as a result. Although these improvements will increase the pupil capacity in the area to an appropriate level, the distance between the concerned schools and the site at Cammo will result in an unnecessarily and unacceptably high level of unsustainable traffic to be generated.

It is not recommended that the location of SCH 6 be altered, as it is accepted that the existing proposal is located a manner that can best serve the housing development proposed at Maybury. Similarly, Forrester High is the only local secondary school capable of being suitably extended in response to the level of proposed housing in the

area. Instead, it is recommended that Cammo be no longer identified as a strategic housing proposal. There is already more than enough housing land identified within West Edinburgh consisting of existing housing sites and other sites identified in Table 4 of the LDP, and the location of Cammo is not suitable for the large scale development of family homes owing to the site's lack of proximity to the proposed improvements to the local school network.

### **Policy context**

#### *SPP*

National, regional and local policy stipulates that adequate educational infrastructure must be provided in line with LDP development proposals, and consequently, the Council has proposed provision of a sufficient amount of additional space at local schools. However, the site at Cammo is not suitably located to utilise these proposed educational service improvements.

In SPP, it is stated that 'the fundamental principle of sustainable development is that it integrates economic, social and environmental objectives' and that an overarching aim is to achieve the right development in the right place (para. 35). It is also stated that the location of new development should, 'reduce the need to travel and prioritise sustainable travel and transport opportunities' and should also 'take account of the capacity of existing infrastructure' (para. 38).

The Council has made efforts to increase the local educational services capacity, in line with the number of homes expected to be generated by the New Housing Sites proposed in the LDP. The site at Cammo (HSG 20) however, is not ideally located to effectively and sustainably utilise these school improvements and the capacity at nearby establishments is already pressurised. Therefore, HSG 20 does not mirror other newly identified LDP housing sites (notably Maybury 1 and 2), in terms of its location in relation to the intended network of schools in west Edinburgh.

The accompanying Education Appraisal (EA) of the proposed Edinburgh LDP identifies that an estimated 146 primary school pupils will result from the intended residential development of the site. Out of all the proposed housing sites in West Edinburgh, development at Cammo will generate one of the highest numbers of primary school aged children in the area. It is acknowledged that this is partly due to the number of family sized homes which will likely be built on the site.

In addition to this, a further 260 pupils are expected to be generated as a result of proposed development at the Maybury sites. Therefore, the level of secondary school aged pupils in the wider local area will only intensify as a result of these proposed developments.

Due to the high number of pupils expected to result from development at the Cammo site, it is likely that the majority of these pupils will attend the new 14 class structure (two stream) primary located south of Turnhouse Road (EA, para. 6.7). The addition of this primary school is necessary, in line with SPP, as only a 'small amount of spare capacity' currently exists, and there is 'limited scope for extensions' to existing schools in the area (EA, para. 6.6).

There is also currently insufficient capacity at local secondary schools to accommodate the number of secondary pupils generated by development at Cammo (HSG 20). It is stated in the Education Appraisal that 105 secondary school pupils are estimated to result from the Cammo proposal, when developed. Again, this number is second only to the number of pupils estimated to be generated by housing development of the large Maybury site (188 pupils). In total, across all proposed sites in the LDP, 359 pupils will result.

Currently, there is only capacity for an additional 346 secondary school pupils in the entire West Edinburgh area. It should be noted that the majority of this capacity is associated with Forrester High School (245 spaces), and the remaining found at Craigmount High School. Both of these numbers should however, be viewed in relation to The Royal High School, which is currently 31 pupils over capacity. It is stated in SPP that, 'when identifying locations for housing, planning authorities and developers should consider the reuse of previously developed land before development on greenfield sites', and that 'the availability of infrastructure, including waste management infrastructure and education and community facilities' are crucial considerations in this identification process (para. 80).

The council has put forward proposals geared towards improving local educational services within the West Edinburgh area as a response to the New Housing Sites proposed in Table 4 of the LDP. It is contended that the site at Cammo is not suitably located to utilise these improvements. Adversely, housing development at the site will result in the generation of excessive, unnecessary and unsustainable levels of traffic during peak travelling times. Owing to busy traffic activity on several roads and junctions surrounding the proposed site, there are also apparent issues which may result concerning the safety of the pupils anticipated to live at Cammo (HSG 20) in the future.

#### *SESplan*

The South East Scotland Strategic Development Plan (SESplan) does not explicitly provide comment on the relationship between LDPs and local educational services. However, it does provide general comment on the necessity of having adequate infrastructure provided for as a means of facilitating development. In Policy 9 of SESplan, it is stated that authorities should 'safeguard land to accommodate the necessary infrastructure' in the area.

By proposing that a new primary school be built, and by proposing an extension to Forrester High School, it is acknowledged that the Council has adequately addressed the issue of school capacity in the area, and these improvements are ideally located to serve the majority of new housing sites proposed in the LDP. However, as a result of these improvements, the proposed allocation at Cammo is no longer a sustainable housing location in relation to available and / or proposed infrastructure in the area.

#### *Proposed Edinburgh Local Development Plan*

A site brief for the sites at Maybury and Cammo is contained within the LDP. Here, it is stressed that ultimately 'sustainable urban communities' will be created at these sites (p. 62). In terms of the site at Cammo, it is argued that this is not the case. While housing development at Maybury will be located in close proximity to the newly

proposed primary school, development at Cammo will result in unnecessary increases in traffic levels at peak times.

The location of the new school will be highly accessible for pupils living at the Maybury sites. However, primary aged pupils intended to live at the Cammo site will have to walk approximately 20 minutes to get to this new school. It is argued that this length of journey will not encourage green transport methods (such as cycling and walking) to and from the school.

Much of this journey will take place on Maybury Road, which is already busy and congested. It is therefore argued that Cammo should be removed from the list of New Housing Sites as a result of the unsuitability of this location for family homes. An oversupply of housing land has been allocated through the emerging LDP, and there is little justification for identifying Cammo as a potential housing site owing to the site's distance from the proposed new school. Maybury road is also currently too dangerous to expect primary school aged pupils to walk down regularly.

Furthermore, the use of public transport links to convey children from home to school, although ideal, is not entirely realistic. In line with modern living standards, it is therefore likely that large scale development at the Cammo site will result in an unnecessarily large amount of extra traffic during peak travelling times from the site to the proposed school location.

In terms of local secondary schools and their accessibility, and their distance from the Cammo site, Craigmount High is closest, followed by the Royal High School. Forrester high is the furthest from the site, and is an estimated 40-45 minute walk from Cammo. In a similar manner to the proposed new primary school, it is estimated that this walking distance will result in an unnecessary increase in the numbers of cars used during peak traffic times in the area. It is argued that this impact will result in spite of the public transport links found in the area, as it is unrealistic to suggest that every secondary school pupil will use this transport method.

Forrester High will inevitably be used to accommodate the number of pupils generated by development at the Cammo site. It is stated that 'due to the size of Craigmount High and The Royal High schools and the Council's commitment to a maximum number of pupils in a school, an extension at Forrester High from 900 to 1300 pupils is proposed' (para 6.15), and this school is therefore the **only establishment in the area suitable for expansion.**

In the LDP, a series of infrastructural improvements are included as part of the Action Plan, which establishes various tasks that must be addressed in line with the development of proposed housing sites. 'School capacity increases, including new schools' is included in this list (p. 80). There is therefore a consistent policy approach towards the provision of schools and other forms of infrastructure across national, regional and local policies. This consistent approach highlights the importance of the availability of school capacity in relation to proposed housing. It also highlights the unsuitability of the site at Cammo as a location for the large scale development of further family homes in the area.

The vast majority of primary school pupils who will potential live at the Cammo site

will inevitably use the new primary school. This is unavoidable due to the estimated 146 pupils that will result from this development at the limited primary school capacity in the area (currently only 109 pupil places available across all 4 primary schools in the West Edinburgh area).

***Conclusion***

As a response to the level of housing development proposed to occur in West Edinburgh, the Council has admittedly taken steps towards increasing the local school capacity throughout the LDP plan period. These major actions, primarily being the development on an entirely new school at Maybury and an extension to Forrester High, are necessary to facilitate the housing needs of the local area. However, it is contended that the site at Cammo cannot adequately be supported by the intended local school network, and should be eradicated from the LDP as an identified New Housing Site.

The location of the Cammo in relation to existing and proposed schools will also have a detrimental impact on traffic during peak times. The proposed primary and secondary school development projects will inevitably cause a disproportionate amount of private car trips to result from housing development at Cammo.

The site at Maybury, in terms of the pupils expected to be generated and convenience of local schools, appears to be a more sustainable location for family housing. The ample houses proposed at the Maybury sites are also capable much of the housing needs of West Edinburgh.

CRA strongly objects to proposal HSG 20 on educational infrastructure and capacity grounds, and would ask the Planning Committee to reconsider this proposal as a result of these matters.

Please use a continuation sheet if required