

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

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| Representation forms must be received by 5pm on Friday 14 June 2013 and can be submitted electronically to; localdevelopmentplan@edinburgh.gov.uk 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. | | | | | |
| Section 1. Please provide your contact details 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. | | | | | |
| Name: Gary Bennett (Chair) | | | Organisation Name: (if applicable) Cammo Residents Association | | |
| Address: 42 Cammo Grove, Edinburgh, EH4 8EX | | | | | |
| Telephone: 0131 339 7555 | | | Email: info@cammoreResidentsAssociation.org Please provide an email address if possible as this helps us improve efficiency | | |
| Agent: N/A | | | If you provide an Agent's name we will direct all subsequent correspondence to your Agent | | |
| Agent Address: N/A | | | | | |
| Agent telephone: N/A | | | Agent Email: N/A | | |
| Section 2. Please tell us which part or parts of the Proposed Plan this representation relates to: | | | | | |
| Page No. | 11-16 | Part and Section | Part 1- Section 2 | Paragraph No. | 31-52 |
| Proposal Reference | HSG (20) | | Policy Reference | Policy DES 9 Urban Edge Policy ENV10 Green Belt and Countryside | |

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| Other | Green Belt (Paragraphs 32-34) Fig4 Edinburgh Green Belt |
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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 **YES** (Please complete sections 4 and 5 below)

Support as written **NO** (Please complete section 5 below)

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

The Cammo Residents Association object to the LDP on the basis of Green Belt and Countryside policy. It wishes to see changes to the LDP in order to include Cammo (HSG20), within the policy provisions of LDP Policy ENV10 Development in the Countryside and Green Belt. This should also include:

- Retention of the existing Green Belt Boundary at Cammo Edinburgh in respect of Proposal HSG 20 in order to preclude proposed housing development ;
- Amendment to re-instate the Green Belt at Cammo and preclude further urban expansion, coalescence and sprawl in this location;
- Maintain the Green Belt at Cammo in order to protect the landscape character and setting of the City; and
- Amendment to the Green Belt Plan (Fig 4) to re-instate the Cammo Green Belt.

CRA has engaged VLM Landscape and Urban Design to provide a professional opinion of Landscape and Visual Impact of the LDP proposals and wish to see this issue fully scrutinised at Inquiry.

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.

Proposed LDP

Land at Cammo (HSG 20), proposed for urban development (500-700 houses) on Green Belt land is contrary to the principles of the Natural Environment section of the Proposed LDP (Pg 11). It is also inconsistent with Proposed Policy Env 10 *Development in the Green Belt and Countryside* and Policy Des 9 *Urban Edge Development*.

The purpose of Green Belt (Paragraph 32) is to direct planned growth as well as:

- *Protect and enhance the quality, character and landscape setting and identity of neighbouring towns and cities; and*
- *Protect and give access to open space within and around the city and neighbouring towns.*

This is exactly what the Green Belt at Cammo achieves. HSG 20 will promote urban sprawl and coalescence without defensible and robust physical boundaries being established. The quality character and landscape setting will be detrimentally affected by major visual impacts of built development. Suburban development will have the effect of reducing established and valuable access to open space in the West of the city.

Existing Green Belt boundaries are robust and defensible, and any alteration would be unnecessary and inconsistent with the spatial strategy in both the SDP and the Proposed LDP.

Proposed Policy ENV 10 Development in the Green Belt and Countryside sets out conditions for future development in the Green Belt. It states that: *'Within the Green Belt and Countryside shown on the Proposals Map, development will only be permitted where it meets certain criteria and would not detract from landscape quality and or / the rural character of the area'*.

Development at Cammo does not comply with these criteria and is an unnecessary incursion into the Green Belt. It will result in poor quality suburban development and reduce the environmental amenity, recreational potential and biodiversity of the area conflicting with other Council strategies relating to open space. In addition the density of development would preclude current short and long distance views to Cammo Tower, Maudsley Hill and the Pentlands as breach the skyline.

It would be impossible to maintain the landscape quality or rural character of the remainder of the area within this part of West Edinburgh. HSG 20 and consequent development on the Green Belt is therefore counter - productive. Indeed this is justified in the corollary to ENV10 (page 95) where it is stated that *'the key test for all proposals in the green belt and countryside areas will be to ensure that the development does not detract from the landscape quality and or rural character of the area'*.

Planning and landscape reasons for objecting to this part of the LDP are as follows;

- HSG 20 represents an unjustified and unwarranted incursion into the Green Belt;
- Removal of Green Belt in this location is contrary to the existing Development Plan and is also inconsistent with SESplan and Scottish Planning Policy and Supplementary Guidance;
- It would detract from the quality, character and landscape setting and identity of this part of the city directly visible from a main arterial road;
- It would lead to coalescence and urban sprawl effectively conjoining Cammo with East Craigs and proposed housing at West Craigs;
- It removes access to valuable recreational open space at the Cammo Estate;
- It is not supported by SNH, key Government Agencies or community organisations; and
- No adequate evidence has been prepared by the Council to justify the deletion of this land from the Green Belt.

The Councils' Revised Environmental Report (March 2013) advises that *'To the east the Green Belt is relatively well defined by Maybury Road and planting bordering the Bughlin and Drumbrae housing estates'*. Also that *'elevated landform to the west and ridge of West Craigs to the south are capable of providing an inferior but still acceptable green belt boundary and visual containment to restrict future urban growth'*. This is strongly disputed by our analysis and there are development aspirations beyond these areas.

The LDP must accommodate the strategic growth requirements. However it is not accepted

that Cammo needs to be identified within the LDP as a housing site as West Edinburgh has an over allocation of housing land. Paragraph 33 states that the Green Belt boundaries ‘*remain largely unchanged*’ and does not refer specifically to Cammo.

It is not considered that there has been a full or proper assessment of the Green Belt and indeed this process has been criticised as being inconsistent by Scottish Natural Heritage and the Cockburn Association. Indeed the latter states that:

The Association strongly opposes the sacrifice of green belt for urban sprawl. The Scottish Planning Policy (2010) identifies a purpose of the green belt “to protect and enhance the quality, character, landscape setting and identity of towns and cities”. The Edinburgh Green Belt Study (2008) Stage 2 report assesses certain sites for development suitability. We are unable to find any evidence that the potential capacity of Stage 2 sites for housing has been assessed. Hence, we are very concerned that this study seems to have been ignored and that different criteria are being used to identify sites for development (paragraph 3.8 of the MIR) – apparently in order to find sites within the two SDAs. The EGB study demonstrated that there is very limited capacity for additional development in the green belt without causing unacceptable damage to its integrity and purposes...The SDP only considered an even greater use of the green belt in its alternative scenario, but there are many different scenarios and to build on the green belt is neither inevitable nor acceptable in light of the SDP’s admission of increased carbon emissions during the lifetime of the Plan...We therefore strongly oppose the sacrifice of this agricultural land in the green belt for low density urban sprawl...The alternative area West of Maybury Road is unsuitable for development as it provides a very clear division between the suburban edge of the city and the rural agriculture to the west. Further, it provides an excellent setting for the Cammo Estate with clear uninterrupted views to Cammo Tower notable as the alleged inspiration for the tower at the House of Shaws in Robert Louis Stevenson’s novel Kidnapped. This provides an excellent approach to the historic city of Edinburgh and would be greatly diminished by extending the suburb of Cammo.”

Development of the Green Belt at Cammo will not assist in planned growth and will counter LDP objectives. Also it will adversely impact on Cammo Estate, Cammo Tower and the River Almond. Development would be directly contrary to Biodiversity (Paragraphs 39-40), the Central Scotland Green Network and National Planning Framework 2 (paragraph 46).

Cammo is specifically referenced in Paragraph 47 ‘*Some parts of the Green Belt contribute to Edinburgh’s green network. Key elements include the Pentlands Hill Regional Park, Bonaly Country Park, Cammo Estate, the Water of Leith, the Union Canal Waterfront Promenade and the proposed South East Wedge Parkland*’. It goes on to emphasise the wildlife recreational landscape and access value of the Green Network.

This has led to a contradictory and inconsistent approach to Figure 5 The Green Network in the LDP. Indeed paragraph 50 states that ‘*The growth areas of West and South East Edinburgh provide opportunities to extend existing green corridors into the wider countryside...*’ This proposal would reduce the green corridor.

LDP Policy Des 9 Urban Edge Development is being applied without due regard to the impact and adverse affects. Re-designation of this land has not been subject to a full and proper appraisal of key Green Belt tests.

- The LDP does not promote the opportunity to enhance the appearance of the green belt nor increase the potential for countryside access or enjoyment; and
- Interpretation of Green Belt guidance is not fully consistent with Scottish Planning Policy (SPP) which is a material consideration.

LDP Policy DES 9 specifies that : *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;*
- b. *Promotes access to surrounding countryside if appropriate;*

c. Includes landscape improvements that will strengthen the Green Belt Boundary improve amenity and enhance bio-diversity.

It is clear from our appraisal (see attached) that the proposed development would not meet these requirements. This view is also strongly supported by SNH, the Cockburn Association, Cramond and Barnton Community Council, Friends of Cammo and River Almond Trust.

Strategic Development Plan - SESplan

SESplan Policy 12 Green Belts states that:

Local Development Plans will define and maintain Green Belts around Edinburgh ... for the following purpose to:

- a. maintain the identity and character of Edinburgh and Dunfermline and their neighbouring towns and prevent coalescence unless otherwise justified by the Local Plan settlement strategy;*
- b. Maintain the landscape setting of these settlements; and*
- c. Provide opportunities for access to open space and the countryside.*

Local Development Plans will define Green Belt boundaries to conform to those purposes ensuring that the strategic growth requirements of the Strategic Development Plan can be accommodated. Local development Plans should define the types of development appropriate within Green Belts. Opportunities for contributing to the Central Scotland Green Network proposals should also be identified in these areas.

Retention of Green Belt at Cammo would conserve and enhance the landscape setting as well as enhancing the character of the city. This area is integral to the Green Network and facilitates access to the surrounding area. Maybury Road provides an effective and robust green belt boundary. Clear demarcation between town and country is important to the defensibility of the Green Belt boundary and its objectives and is justified in this respect.

Scottish Planning Policy (SPP)

SPP identifies the role of Green Belts as a key part of the settlement strategy to protect and enhance the quality, character landscape setting and identity of towns and cities. Paragraph 159 states that '*Green Belt designations should provide clarity and certainty as well as directing development to suitable locations in order to manage growth*'.

In this case none of the above requirements would be met and coalescence would invariably result.

Paragraph 161 specifies that '*where it is considered necessary the proposed release of land previously designated as green belt should be identified as part of the settlement strategy set out in the development plan*'. It should be noted that the extant plan is the Edinburgh and Lothian's Structure Plan 2015 and the City of Edinburgh Local Plan as the SDP. SESplan is not yet approved, therefore the settlement strategy has not yet been endorsed. Indeed proposed modifications before Scottish Ministers suggest Supplementary Planning Guidance are required to determine housing land allocations.

SPP (Paragraph 162) states that '*Green Belt boundaries should be clearly identifiable on the ground using strong visual or physical landscape features such as rivers, tree belts railways or main roads. Hedges and field enclosures will rarely provide a sufficiently robust boundary*'.

Paragraph 163 states that '*Where a proposal would not normally be consistent with green*

belt policy, it may still be considered to be appropriate, either as a national priority or to meet an established need if no other site is available. An established need is not proven. The Council is over supplying land in West Edinburgh, but most relevantly Cammo has not been tested against other suitable locations within the Green Belt.

Draft Scottish Planning Policy (May 2013)

Emerging SPP re-enforces the emphasis given to Green Belt designations (paragraphs 49-52). It emphasises the need to support the spatial strategy rather than substituting for other countryside and development policies.

Cammo may appear to be an obvious development site to the Council however the guidance states that *'The spatial form of a green belt should be appropriate to the location (Para 50)'*. This need not encompass all the built development but can be a buffer area and wedge of land as at Cammo. LDPs are required to consider the *'detailed boundary of any green belt'* and this has not been done.

Paragraph 50 states that *'Local development plans should establish the detailed boundaries of any green belt, giving consideration to:*

- *Redirecting development pressures to more suitable locations;*
- *Establishing clearly identifiable visual boundary markers..... Hedges and field enclosures will rarely provide a sufficiently robust boundary'.*

No consideration of re-directing development pressures has been undertaken. Finally any amendment would be reliant on field enclosures and hedges rather than Maybury Road.

Paragraph 52 states that *'In developing the spatial strategy, planning authorities should identify the most sustainable locations for longer term development and where necessary, review the boundaries of any green belt'*. There is no current need to re-assess the boundaries in this location given the availability of land in other locations.

Conclusion

There is no over-riding need for development of the Cammo Green Belt. Alternative locations have not been tested and allocation is contrary to the Councils Environment Report and specialist advice from consultees.

HSG 20 will contribute to the cumulative erosion of the Green Belt's integrity in West Edinburgh leading to coalescence. The proposed development will have major unacceptable landscape and visual impacts destroying the character setting and identity of Cammo. The recreational value of the area would be significantly diminished with Cammo Estate becoming a suburban park.

There is no guarantee that the Councils mitigation measures or that planting on Maudesley Hill will provide a strong green Belt boundary or prevent further development to the west of Cammo.

Given the numbers and density of development would not permit important views from Maybury Road and other receptors to Cammo Tower, Maudsley Hill or the Pentlands where the skyline would be breached.

Please use a continuation sheet if required