

## Edinburgh Local Development Plan – Second Proposed Plan Representation Form

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

**Please fill out contact details in BLOCK CAPITALS.**

If you have any queries regarding your representation, please refer to the accompanying guidance note or contact Marius Hince on 0131 529 4692.

Representation forms must be received by **5pm on Friday 3 October 2014**

and can be submitted electronically to:  
[localdevelopmentplan@edinburgh.gov.uk](mailto: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 online and for public inspection at Waverley Court, except any information which would be subject to the Data Protection Act 1998 (i.e. signature, telephone number, email).

<b>Name:</b>  Gary Bennett	<b>Organisation Name (if applicable) :</b> Cammo Residents Association
<b>Address:</b>  	
<b>Telephone:</b>  	<b>Email:</b> gbennett@braidwood-fire.com Please provide an email address if possible as this helps us respond more efficiently
<b>Agent (if applicable) :</b>  	If you provide an Agent's name we will direct all subsequent correspondence to your Agent
<b>Agent Address (if applicable) :</b>  	
<b>Agent telephone (if applicable) :</b>  	<b>Agent Email (if applicable) :</b>  

<b>Section 2. Please tell us which part or parts of the Second Proposed Plan this representation relates to (not all boxes require to be completed):</b>				
Proposal/Site Reference	HSG20		Policy Reference	
Page No.		Part and Section		Paragraph No.
Site name/Other	cammo			

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

Seeking a change (Yes/No) → (If Yes please complete sections 4 and 5 below)  
 Support as written (Yes/No) → (If Yes please complete section 5 below)

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

The Cammo Residents Association seeks an amendment to the Proposed LDP to remove Proposal (HSG 20). It also demands that all references to associated design and mitigation measures including and the Maybury and Cammo Site Brief are removed from the LDP.

This objection to the Proposed LDP is against the principle of development and the need for Cammo as an additional housing site. In addition:

- There is a disparity between LDP Spatial Strategy Summary and Edinburgh Green Belt within the LDP in relation to Cammo;
- Objection to SESplan regarding the West Edinburgh SDA remains outstanding and is a material consideration; and
- Reference to CRA concerns over HSG19 is identified within the accompanying Transport and Infrastructure submission.

CRA is not prepared to fully engage on material development, design or mitigation factors until the principle of development is established through a Public Inquiry.

**Section 5. Representation**

Your representation should be no more than 2,000 words. You should explain clearly and concisely your reasons for seeking a change to or supporting this aspect of the Second Proposed Plan. You may also provide additional documents at this stage, and may not have the chance to do so later (i.e. at the examination stage). 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.

## *Introduction*

Cammo residents association is concerned that the Proposed LDP is making provision for up to 700 new houses at Cammo (HSG 20). This is an unjustified and unwarranted incursion into the Green Belt without due regard to the housing requirement or for the environmental and infrastructure capacity of the location. Fundamentally CRA believe that the scale of housing being proposed for West Edinburgh is excessive and that housing at Cammo is unnecessary in any event and the least sustainable option.

CRA is concerned that the LDP has not been prepared in a transparent manner.

In addition, CRA would like to raise concerns over the public consultation associated with this proposal and the lack of transparency from being a reasonable alternative to becoming a preferred option. We are in discussion with officials and councillors on this matter at present.

CRA has assessed the housing proposals and consider these to be:

- At odds with Scottish Planning Policy;
- Contrary to the aims and objectives of the Proposed LDP;
- Not in accordance with SESplan;
- Not supported by market analysis; and
- In conflict with public opinion across the whole of West Edinburgh.

Furthermore we are not in agreement with the development brief for the site which will result in urban sprawl, a loss of character and identity and is not in accordance with best practice on Designing Places, Planning Advice Notes (PANS) 67 Housing Development and Planning Advice Note 83 on Masterplanning.

Cammo has a planning history of resisting development and previous applications and appeals have been rebuffed on landscape and environmental grounds related to Green Belt policy irrespective of the housing needs and demands prevalent at the time. This is an important material consideration. The same situation currently applies and should not override weak representations made by developers based on a flawed requirement.

## *Proposed LDP*

This objection relates to Policy HOU1 in the Proposed LDP2. Other CRA submissions deal with related Policy DES9 Urban Edge Development and Policy ENV10 Green Belt and Countryside.

The existing supply of housing land in Edinburgh is currently more than adequate to meet the housing needs of the city over the next five years and well beyond. Proposed New Housing Sites will therefore result in an over-supply of housing land within the west of the city. Release of further Green Belt land in the countryside at Cammo is therefore unnecessary to maintain the required 5 year supply of land over the plan period.

- The City's total contribution to meeting the overall strategic housing land requirement is 32460 houses in the period 2009-24. Therefore 2164 additional homes should be built each year and 10820 homes over 5 years. This includes 10% "to allow generous supply". We challenge that extra allowance as unnecessary, unrealistic and inflated.
- LDP2 Table 3 outlines the Existing Housing Proposals in the Edinburgh area (Sites Refs: HSG 1-18, CC 2-4, EW 1a-c, EW 2a-d). Total current effective supply across these sites can be calculated at approximately 23,800 units. Therefore, the current supply of housing land in Edinburgh equates to over 75% of what is required throughout the proposed LDP period without any windfall allowance (approximately 15 -20%).
- Current effective supply (calculated on the remaining capacity at Existing Housing Sites) is well in excess of the five-year supply figure that is clearly stipulated within the plan. Unnecessary release of green-field land at Cammo is therefore inappropriate and ultimately detrimental to the character of the City.
- In Housing Land Audit (HLA 2012), it is stated that 14,676 housing completions are programmed to occur in Edinburgh during the five-year period 2012-17. This equates to an average annual completion rate of 2,935, which greatly exceeds the annual rate of 2164 completions proposed within the emerging LDP2.

This information demonstrates the adequacy of Edinburgh's existing supply of housing land over the plan

CRA is concerned that the Council through both LDP1 & LDP2 has fundamentally misunderstood the requirements of Scottish Planning Policy and the interpretation of the SDP Housing Needs and Demand Assessment (HNDA), by allocating this site in West Edinburgh. The production of Supplementary Planning Guidance will allow the Council to re-visit its spatial strategy afresh.

We are also aware from the MIR consultations that:

- Other parts of the Green Belt adjacent to areas in need of re-generation are being promoted by developers and resisted by the Planning Department; and
- In addition other parts of the city such as Balerno remain sacrosanct under a perceived policy of restraint (even for single houses in the Green Belt).

A full assessment of the available sites within the city through urban capacity or a Green Belt assessment has not been undertaken and this is a major deficiency within the LDP. For example, the SAICA premises on Glasgow Road -Turnhouse Road is a potential re-development opportunity identified within the LDP which will again increase the housing provision. Other opportunities in West Edinburgh have not been properly considered by the LDP2.

Feasible opportunities within the Green belt at Craighall will also occur within the plan period. Likewise these have not been fully considered. The result is urban sprawl and over-provision to the detriment of Cammo on this occasion.

Housing completion rates have been slower than expected owing to the economic recession and its impact on the house-building industry. However, it is stated within the proposed LDP2 that 'recent housing completion figures show that building rates are increasing'. As economic circumstances are improving, it is argued that there is no other clear impediment to development taking place on sites included in the Council's existing supply of housing land. The release of greenfield land at Cammo for housing purposes is therefore not demonstrably required.

There are currently approximately 10 existing housing sites identified within West Edinburgh, demonstrating the scale of growth already happening in this part of the city. The inclusion of Cammo would lead to an oversupply and result in a dangerous situation whereby developers are land-banking unable to effectively develop at an appropriate rate thereby threatening essential infrastructure and community facilities. Cammo's inclusion may therefore be detrimental to the success of development occurring at neighbouring locations and the site should be removed from the list of Proposed Housing Sites in order to avoid this eventuality.

In support of the arguments stated above, the Edinburgh and the Lothians Structure Plan Joint Liaison Committee have previously stated that 'the overall land supply is more than adequate to meet the requirement of ELSP 2015'. Similarly, in his letter dated 29<sup>th</sup> October 2010, Scotland's Chief Planner stated that 'the general availability of mortgages' and the 'low level of demand from purchasers' were the main impediments to house completions taking place on sites within local authorities' current land supplies. As Edinburgh has an effective 5 year supply of land, there is no immediate requirement to vary this approach.

These arguments support of the effectiveness of the existing and abundant supply of housing land in Edinburgh with a concentration in West Edinburgh. As the economy and house-building industry are beginning to strengthen, there is no clear reason why the existing housing sites are not capable of being readily developed to meet demand. Additional release of important green-field sites, such as Cammo, cannot be justified in terms of any deficiency in the current stock of housing land. It is therefore strongly recommended that Cammo be

removed from Table 3 of the emerging LDP, which lists New Housing Sites proposed in the Edinburgh area.

#### *Strategic Development Plan – SESplan*

SESplan is concerned with delivering effective land to allow economic growth and housing development for the population. The SDP and overall requirement is currently under consideration by Scottish Ministers and significant modifications envisaged to the final approved Plan.

Provision needs to be made for 10,150 houses across the SESplan area up to 2024 within Strategic Development Areas. It is therefore premature to consider details in advance of any supplementary planning guidance however:

- Within Edinburgh (Tables 3 and 4), SESplan identifies a net supply 36,500 houses with a further requirement of 1,500 between 2009-19 and 1,500 2019- 2024.
- In West Edinburgh, SESplan identifies a committed development of 800 units with a further 2,000 units required to 2024.

These figures derived from the HNDA assessment and applied to West Edinburgh are not clear and should be revised by the LDP. For example it is clear from Table 3 of the LDP that there are far more than 800 committed allocations within West Edinburgh. Our estimate is that the figure is closer 1,410 houses with the vast majority still to be built.

CRA therefore objects to the figures presented in the LDP (as derived from the SDP). The housing requirement issued by the Council for West Edinburgh is not clearly stated or transparent. It is clear that the requirement is actually already being met and will be exceeded by other planning consents through the plan period.

**THE LDP2 is proposing over 4000 new allocations within West Edinburgh which is well in excess of the requirement and unwarranted given the existing supply city wide and in the local area.**

There is an existing an outstanding objection to the West Edinburgh SDA. This objection relates to the existing outstanding issue and states that the whole of west Edinburgh needs to be considered as part of the proposed land allocation.

#### *Scottish Planning Policy*

Allocation of land at Cammo is contrary to Scottish Planning Policy (paragraphs 66 - 88). It is recognised that some green-field development is required and that a 5 year supply of land needs to be maintained. However, housing should be provided on a sustainable basis with appropriate land identified in the ‘right places’.

In particular CRA is concerned that the LDP has not taken policy guidance in respect of:

- The LDP interpretation of the HNDA Requirements and alignment with Local Housing Strategy (paragraphs 67, 68 and 69);
- The lack of account given to ‘wider economic , social and environmental objectives should be taken into account when determining the scale and distribution of the housing requirement’ (paragraph 70); and
- Consideration of the scale and location of the housing land requirement aligned with infrastructure (paragraph 71).

Paragraphs 77 - 85 deals with the Location and Design of New Development setting out key principles for new housing. CRA is concerned that important criteria relating to location, Draft Scottish Planning Policy (May 2013)

The Draft SPP (currently under consultation) re-enforces the importance of place making. In addition it emphasises that the spatial strategy should be informed through engagement with stakeholders (paragraph 43), ensure an integrated approach (paragraph 44) and co-ordinate development with infrastructure and service capacity (paragraph 45). Relevantly (paragraph 48) states that 'Development Plans should also set out the circumstances in which new development outwith settlements may be appropriate'. The LDP has not undertaken any of this.

In terms of Enabling the Delivery of New Homes (paragraphs 79 - 99) provision should be made where economic investment is planned or there is a need for re-generation. Contrary to practice, the outcome of the HNDA is not yet determined and paragraph 83 states that 'In city regions, local authorities may wish to wait until the strategic development plan has been approved before finalising the local housing strategy to ensure that any modifications to that plan can be reflected in the Local Housing Strategy and local development plans'.

The approach taken by the LDP in seeking to maintain a housing land supply is also contrary to Circular PAN 2/2010 on Housing Land Audits and Affordable Housing. No details on affordable housing related to Cammo are included within the LDP.

#### Site Specific Development

CRA object to the Development Brief for Maybury and Cammo within the LDP and are unprepared to negotiate on this until the principle of development is determined. Suffice to say that it is not in accordance with Designing Places or current Planning Advice Notes on design and development.

We reserve the right to comment on this further at the next stages of the planning process where it will be demonstrated that development here is not feasible or viable given necessary environmental and planning safeguards required.

#### Conclusions

CRA consider that there is no requirement for additional green field housing at Cammo and that any such allocation is premature and contrary to Scottish Planning Policy. A fundamental re-assessment of the capacity of committed land in West Edinburgh is required.

SESplan calls for only 2,000 new allocations in West Edinburgh. It is therefore not accepted that Cammo should be sacrificed when there is adequate capacity on committed sites and new allocations elsewhere without taking into consideration windfall developments and future planning applications in other locations.

The Council LDP has not demonstrated a clear requirement and the developers and landowners have not made any form of convincing case for the inclusion of Cammo to date.

CRA has grave concerns how this land was included in the plan given the consultation exercise, the weight of public objection and lack of justification. The Cammo community is not being treated equitably and many preferable alternative locations exist within the city.

CRA objects in the strongest of terms and would ask the Planning Committee to reconsider the principle of development on housing requirement grounds. Accessibility, infrastructure, natural environment, heritage and bio-diversity have been largely ignored by the LDP. This is

totally contrary to the Governments Place Making agenda and Supplementary Guidance approved by the Council. Finally, there are no reasonable traffic measures proposed to deal with the anticipated increased volumes at Barnton and Maybury.