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DRAFT NO: 1

CLOSING SUBMISSIONS

on behalf of

WEST CRAIGS LIMITED

Hearing held: 6 October 2008

Edinburgh City Local Plan Inquiry

Strategic Housing Proposal: Meadowfield Farm/West Craigs

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Strategic Housing Proposal: Meadowfield Farm/West Craigs

1. INTRODUCTION

- 1.1 West Craigs Limited (“WCL”) appeared at the Edinburgh City Local Plan Inquiry hearing session on 6 October 2008 in support of its objection to the Council’s strategic housing proposals.
- 1.2 WCL submits that the allocation of a site at Maybury Road, West Craigs, would be an appropriate site for housing allocation and would accord with the objectives of the policies of the Edinburgh and the Lothians Structure Plan 2015 (“the Structure Plan”).
- 1.3 WCL rests on its statement of case and documents WCL 1-17 in support of the allocation of the site. The submissions are therefore confined to clarifying issues discussed at the hearing.

2. BOUNDARY BETWEEN EDINBURGH CITY AND RURAL WEST EDINBURGH LOCAL PLAN AREAS

- 2.1 The boundary between the Edinburgh City Local Plan (“ECLP”) area and the Rural West Edinburgh Local Plan (“RWELP”) area bisects the West Craigs site. The City of Edinburgh Council (“the Council”) accepted at the hearing that there was no rationale for the present location of the boundary between the RWELP and ECLP areas, which does not correspond with any physical features on the ground and accepted that this caused “unfairness” to WCL. The Reporters requested the parties’ views as to whether they could competently recommend a change to the boundary between the local plan areas.
- 2.2 WCL submits that if the Council proposed to act on any recommendation to alter the boundary between the ECLP and RWELP areas, this would have the effect of altering the RWELP. In terms of section 12 of the Town and Country Planning (Scotland) Act 1997 the Council would have to publicise any such proposal and consider any representations. An alteration to the RWELP would also require the approval of the Scottish Ministers. This could lead to procedural confusion for the Council as it is currently taking forward a separate alteration to the RWELP.
- 2.3 WCL has submitted a masterplan (WCL7) that demonstrates the potential layout of a development at West Craigs. WCL does not seek the allocation of the entire West Craigs site (“the larger scheme”) in the context of this local plan inquiry. Instead, WCL seeks the allocation of that part of the West Craigs site within the ECLP boundary which could accommodate 50-60 units (“the smaller scheme”), together with the adjacent Maybury Road site (“the Taylor Wimpey site”). The total capacity of the conjoined sites would be around 210 – 260 units. WCL submits that while it is beyond the remit of

the Reporters to consider objections relating to the content of the RWELP, it would be competent for the Reporters to give a view in their report of this inquiry on the feasibility of future development in the part of the West Craigs site lying within the RWELP area.

3. STRUCTURE PLAN AND SCOTTISH GOVERNMENT POLICY

- 3.1 WCL submits that the allocation of the smaller scheme would meet the requirements of Policies HOU4 and ENV2 of the Structure Plan and would not conflict with relevant Scottish Government policies in SPP3 and SPP21.
- 3.2 Although an indicative plan for the smaller scheme has not been submitted to the inquiry, WCL confirmed that the smaller scheme could be developed independently of the larger scheme. Access to the smaller scheme could be provided from Craigs Road or from Turnhouse Road. The Council confirmed that the site had no other infrastructure constraints and that there was sufficient capacity in local schools. With regard to criterion (a) of Policy HOU4, there are no further steps required to enable the site to become effective. WCL submits that the site would be effective within five years as required by SPP3.
- 3.3 WCL submits that the site would not undermine Green Belt objectives, as required by criterion (c) of Policy HOU4. The Council accepted at the hearing that the smaller scheme would possibly not have any great visual impact, which is confirmed in document WCL2. The Council also accepted that the smaller scheme does not extend up to the ridge and would not affect the skyline and that the impacts on the landscape setting could be contained.
- 3.4 A physical and defensible green belt boundary could be established on the western edge of the smaller scheme within land owned by WCL and on the northern edge of the site by Craigs Road, enhanced by further structure planting on land to the north of Craigs Road owned by WCL. Policy Des 8 of the ECLP does not require planting of a 50m wide tree belt to establish physical boundaries as was suggested by the Council at the hearing; the supporting text merely states that landscaping and planting of up to 50m could be used to establish boundaries. The Council's witness, David Willcocks, accepted that the smaller site, in conjunction with the Taylor Wimpey site, had the potential to offer an acceptable Green Belt boundary through planting and that there would be scope for mitigation through WCL's landholdings to the north of Craigs Road on any impacts on the skyline from the Taylor Wimpey site.
- 3.5 The Council accepted that the site had excellent public transport links, with access to the tram and potentially to heavy rail services. WCL maintains that document WCL1 demonstrates that the majority of the larger scheme and the smaller scheme lie within 400m of a public transport stop and that good walking, cycling and public transport networks could be established in accordance with criterion (d) of Policy HOU4.

- 3.6 By allocating a site in the west of Edinburgh at Maybury Road, the plan would provide a range of sites to meet all sectors of the housing market in accordance with criterion (e) of Policy HOU4. WCL proposes family housing and a substantial proportion of affordable housing, which would allow greater choice than allocating the two sites proposed by the Council in the east of the Edinburgh Urban Fringe.
- 3.7 The allocation of the site would meet the Green Belt objectives of policy ENV2 and conform to guidance in SPP21. The landscape and visual assessment in WCL2 confirms that development even of the larger scheme would not have significant effects on the landscape setting of the city. The proposal would also have the advantage of providing a new public park to the north of the site for recreation, including a children's play park which would meet a deficit in this type of provision in the local area. WCL confirms that the costs of providing the park and associated maintenance could be delivered as part of the smaller scheme.
- 3.8 As stated at paragraph 3.4 above, a physical Green Belt boundary could be established for the smaller scheme. In the longer term, the robust and defensible boundaries of Craigs Road and the railway line could demarcate the Green Belt boundary to accommodate the larger scheme.
- 3.9 There was some discussion at the hearing about the impact of the vision contained in the West Edinburgh Planning Framework on Green Belt boundaries adjacent to the larger scheme at West Craigs. While any changes to the Green Belt will be brought forward through the ongoing Green Belt review and the new strategic development plan, the allocation of the smaller scheme would not threaten the maintenance of a continuous Green Belt and would not lead to coalescence. The Council accepted that the larger scheme was, in this context, an area of change and that even the development of the larger scheme would not lead to coalescence between settlements as the term is defined within the Structure Plan.
- 3.10 The smaller scheme does not form part of West Edinburgh, as defined in the Structure Plan, and therefore Structure Plan Policy ECON 5 would not prevent its release from the Green Belt.

4. OTHER ISSUES

- 4.1 WCL submits that its proposals for affordable housing, which are at a relatively advanced stage, would assist the Council in meeting its target for the provision of social rented housing. WCL 17 demonstrates that the Council is experiencing difficulties in meeting this target. While the Council submitted at the hearing that affordable housing provision would not be an overriding factor in allocating sites, it is a factor which should be taken into account.
- 4.2 The location of the site in the west of Edinburgh would provide an opportunity for Dunedin Canmore Housing Association to provide affordable family housing for which there is high demand. The Council submitted that

the areas for affordable housing on the indicative masterplan WCL 7 did not comply with the Council's supplementary planning guidance on affordable housing which provides that no more than 0.5 hectare limit of social rented housing should generally be located together. The Council accepted that this policy "pepper-potting" of small areas of affordable housing was not favoured by housing associations.

5. CONCLUSION

- 5.1 WCL submits that the Maybury Road site, comprising the smaller West Craigs site and the adjacent Taylor Wimpey site, would be more appropriate for allocation in the ECLP than HSG14 and that the proposal for housing at Newcraighall East should be abandoned.
- 5.2 The allocation of the site at Maybury Road would meet the objectives in Policy HOU 4 of the Structure Plan as the site has excellent public transport links and would allow for an element of choice to meet all sectors of the market.
- 5.3 Accordingly, Policy Hou 1 should be amended by deleting the reference to Newcraighall East HSG14 and substituting a reference to Maybury Road, West Craigs. The details of Newcraighall East HSG 14 should be deleted from Table 6.1 and replaced by the allocation of a housing site at Maybury Road, West Craigs, with an estimated capacity of 210-260 houses.