

# Cramond & Barnton Community Council



**Incorporating Cramond, Barnton, Cammo and Quality Street (West)**

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For attention, Declan Semple, Planning Service, City of Edinburgh Council

Sent by e-mail: 15<sup>th</sup> December 2020

Dear Declan,

**20/02916/FUL: S.42 application to vary condition of planning permission 13/01843/FUL. Land north of Cramond Road North.**

**Cramond and Barnton Community Council's response to 'AMA Cramond: Proposed Route-Map' (November 2020)** (see Annex to this letter)

Cramond and Barnton Community Council would appreciate full consideration of the following –

**a. Lack of notification of AMA's Route-Map and request for revised closing date for submissions**

The Community Council understands that some neighbouring residents have been notified of the Route-Map paper submitted by AMA's agents, which outlines a variation in approach to the development of the former Cramond Campus/Brighthouse site. We note also that **the planning portal shows a closing date for responses to this new information by AMA of 23<sup>rd</sup> December**. As of the evening of 14<sup>th</sup> December, the Community Council has had no formal notification of this new information and has seen no notification through the Weekly Lists or received tracking via the planning portal. The Community Council is, therefore, seeking an extension of the closing date for submissions on behalf of the local community. This should take account of the Festive Season and we suggest **a final submission date of 6<sup>th</sup> January, or thereafter**. This would give the Community Council time to publicise AMA's amended approach and give the many households across Cramond with concerns over the future of this site time to consider and respond to AMA's proposals.

**b. Submission of Community Council's Alternative Route-map** (see Annex, below)

The Community Council, with support from residents of the Brighthouse development and taking account of responses to our survey of neighbouring households, has produced an alternative Route-map. This seeks to ensure a more effective and sustainable approach to the development of the site, through use of a range of planning mechanisms, and would provide public greenspace, biodiversity and landscape enhancement, and a limited scale of development, as identified in a revised Planning Framework for the remaining undeveloped and vacant land within AMA's ownership. Importantly, **agreement to the Community Council's alternative Route-map would commit AMA to site improvements, overcome the impasse resulting from unenforceable planning conditions relating to sports pitches, which has been evident over the past 17 years, and provide the community with much needed public greenspace, with provision for informal sports, play and exercise.**

**c. Request for a Meeting with Planning Officers**

**The Community Council would appreciate the opportunity to present and discuss its alternative Route-map to yourself and relevant colleagues**, including Enforcement and LDP Team members, prior to finalisation of your report to the Development Management Sub-Committee. Other than the period from 23<sup>rd</sup> December to 4<sup>th</sup> January, Community Council members are likely to be available for a virtual meeting.

Yours sincerely,

Peter Scott

Planning Representative, Cramond & Barnton Community Council

## Annex: CRAMOND & BARNTON COMMUNITY COUNCIL'S ALTERNATIVE ROUTE-MAP FOR BRIGHOUSE SITE

### Context

Without going into all issues and the long history of the site, some key factors appertaining to the development of the former Cramond Campus site are -

- a. Current planning conditions are, and have long been, unenforceable.
- b. AMA have had 17 years to find operators for a sports complex, but failed to do so (reasons include: intended high levels of charges on sports users, time limited clawback due to University on uplift in land values following any revenue-generating development of site). It is believed that AMA's primary objective is the development of further housing on the site and that they have persistently abused the planning system through attrition.
- c. AMA's statements on establishing a Company with £1m capital to support maintenance of sports facilities cannot be verified.
- d. AMA have deposited demolition and other debris across the site, increasing costs of new sports pitches and effectively rendering much of the ground derelict.
- e. AMA have continually failed to comply with conditions regarding the provision of sports facilities and destoning, levelling and grassing of the site.
- f. **As a result of the above, the community has no confidence that AMA will find a sports facilities operator in the short-/mid-terms** - especially given likely post-Covid and financial contexts. The community's discussions with sports interest have shown that none can meet the financial commitments required to develop and support formal sports facilities (e.g. pitches or courts) on the site along with built facilities (e.g. changing facilities)
- g. There have been no approvals for development on the site owned by AMA other than the completed housing on the northern section of the site. AMA continue to use a vacant and undeveloped part of the site unlawfully for unsightly storage buildings and storage yard.
- h. Consultations with the neighbouring community support CBCC's assessments that **the local community's priorities lie with the provision of public amenity and activity greenspace** (e.g. casual exercise, informal sports, play space and provision for Cramond Primary's needs) **and landscape and biodiversity enhancement, rather than formal sports facilities** – especially those serving commercial clients from outwith the local area. This is consistent with the needs assessment and policies in the Council's '2020 Open Space Strategy', its promotion of active citizens and tackling obesity, and the developing National Planning Framework.

### Route-maps for future planning of the Brighouse site

AMA's 'Proposed Route-Map' paper (Nov. 2020) suggests that –

- i. If a sports solution is to be achieved, a further 5 years would be required to secure a partner, develop and implement proposals
- ii. A review should be taken after 2 years, and if AMA fails to identify a sustainable sports scheme, it should discuss alternative options with CEC and the community.
- iii. Quarterly up-dates should be provided through a Review Group of key stakeholders.

CBCC considers that i. and ii. are disingenuous, as AMA has already had 17 years and failed to achieve these objectives.

Having made no progress over the past 17 years, as demonstrated above, local residents and the wider community have little or no confidence that AMA will deliver a sustainable sports scheme and suitable partners, and improvements to the amenity of the entire site, including provision of much needed, community-oriented, greenspace. Hence, **CBCC rejects the elements illustrated in the left-hand column of AMA's proposed Route-Map diagram -**

**Years 1 and 2: Activities to identify a sports facilities operator(s) and initial proposals**

**Years 3 to 5: Develop and implement sports facilities to operational stage.**

**CBCC's proposed route-map (overleaf) contrasts AMA's proposed approach with the desired approach of the community**, but excludes the column in their table devoted to the delivery of sports facilities, for the reasons stated above.

Year	AMA's Proposed Route-Map 'If no development partner/sports potential is identified' (summary)	Community Council's Proposed Route-Map
1	New advertising/marketing for sports provision	<p><b>January/February, 2021:</b> CEC withdraws the planning condition requiring sports provision, as this is unenforceable.</p> <p><b>By March, 2021:</b> AMA be required to identify any shortfalls in capital and revenue funding required to support the provision and management of agreed community greenspace, after taking account of revenues from sales of completed houses reasonably attributable to undertaking to provide sports facilities. Further, AMA must provide accounting for the £1m reported to have been invested in the management company it created to maintain sports facilities.</p> <p><b>By June, 2021:</b> CEC completes preparation of a new Planning Framework for all vacant and undeveloped land within AMA's ownership in partnership with AMA and the community. This Framework should give priority (including in terms of location and gross area) to –</p> <ul style="list-style-type: none"> <li>- providing public activity greenspace</li> <li>- landscape and biodiversity enhancement</li> <li>- protecting the values of the adjacent Special Landscape Area and Local Nature Conservation Site</li> </ul> <p>in addition to identifying potential sites for, and types of informal sports, residential or related development, which may be acceptable and sustainable.</p> <p><b>By end-July 2021:</b> If no agreement is reached on the way forward, CEC serves an Amenity Notice on AMA. This should require ground preparation, greenspace and informal activities provision and landscaping and biodiversity enhancement over all of the site not identified for built development in the Planning Framework.</p> <p><b>AMA begins to develop planning proposals.</b></p>
2	Continued marketing. Engage with interests on sports proposals	<p><b>Proposals for site progressed by AMA/other developer</b> through planning process and in consultation with community and other stakeholders.</p> <p><b>Details of proposals and progress to be reported bi-monthly.</b></p> <p><b>If an Amenity Notice is required, AMA must fulfil its requirements by March 2022.</b> Otherwise, CEC undertakes remaining works at AMA's expense.</p>
3	Consult on options for site Work up details and progress scheme through planning process	Subject to planning consent and only after all activity greenspace and landscaping has been completed, site preparation for development commences.
4	Progress scheme through planning process	Construction and marketing of development
5	Commence site enhancement, greenspace provision and development	
Notes	Programme driven by AMA No proposals for improvements to site in years 1-4.	<p>Planning Framework driven, and greenspace and amenity improvements ensured, by CEC.</p> <p>Greenspace and other amenity improvements are achieved by year 3, if Planning Framework progressed, or by year 2, if Amenity Order is required.</p> <p>Site works can start by year 3 or earlier, if greenspace and amenity improvements are completed earlier.</p>