

# Cramond & Barnton Community Council



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

For attention: Sonia Macdonald, Planning Service, City of Edinburgh Council

Dear Ms Macdonald

## **21/04210/PPP: RESIDENTIAL & RELATED DEVELOPMENT, NORTH EAST OF 210 CRAIGS ROAD, EDINBURGH**

Cramond and Barnton Community Council is making this submission as a statutory consultee. While the site is outwith CBCC's statutory boundaries, it is adjacent to these and the proposed development would have significant impacts on the local landscape and countryside character, strategic and local roads network and other aspects of the local environment and amenities enjoyed by our community.

In preparing this submission, the Community Council (CBCC) has reviewed the application and consulted the community on the proposals at PAN and PPP stages. We are aware also of the growing number of objectors via the planning portal (108 objections at early October).

### **The Community Council recognises –**

- i. Edinburgh's substantial housing needs, especially for affordable housing;**
- ii. the current proposals would provide a significant number of affordable homes, with design details complying with 'net zero' principles;**
- iii. the policy principle set out in para. 33 of Scottish Planning Policy – i.e. the presumption in favour of development that contributes to sustainable development.**

However, CBCC supports the strategic sustainable growth strategy principles set out in the proposed City Plan 2030 giving priority to brownfield sites for development over the next 10 years and safeguarding of the City's green belt and countryside, which has been increasingly important to the wellbeing of the community during the Covid crisis. In these contexts and for the reasons set out below, **Cramond and Barnton Community Council believes that –**

- i. any decision to approve development on this green belt site, at the current 'proposed' stage of City Plan 2030, would be premature and inevitably give rise to further applications for incremental development on neighbouring green belt land;**
- ii. the adverse impacts of this specific development significantly outweigh the development's benefits.**

In particular, and in summary, **the development proposals will -**

- a. erode the City's green belt, encourage further encroachment on the open countryside and replace the current robust green belt boundaries with more permeable boundaries. In so doing, the development would have significant implications for the emerging City Plan policies;**
- b. impose unacceptable impacts on local landscape character, including that of the neighbouring Special Landscape Area and Historic Garden and Designed Landscape Inventory site;**
- c. generate additional residential and service traffic, which will add to the cumulative pressures from current and proposed developments in North and West Edinburgh on local traffic networks, which frequently operate substantially at/over capacity;**
- d. expose residents, in their homes and open space, to occasional, unacceptable and unpleasant odours from the neighbouring composting site;**

- e. result in development of prime agricultural land, which continues to offer potential for agricultural or horticultural activity, including food growing.

These reasons for opposing the application are described in more detail below.

In framing this objection, the CC notes that –

- i. the Council's Decision Letter in respect of application 16/04738/PPP, which states ... *The proposal is contrary to Strategic Development Plan Policy 12 and Local Development Plan Policies Env 7, Env 10, Des 9 a) and c) and Hou 1 in that the proposed development of land to the north of Craigs Road ... would undermine greenbelt objectives, the nature of the urban edge and setting of the special character of the city and the setting of the Cammo Park Estate recorded in the Inventory of Gardens and Designed Landscapes.*

Refusal of the above application was supported at Appeal (PPA-230-2207) largely for reasons of erosion of the green belt and landscape impacts;

**The Community Council sees no substantial reasons why the Council should revise its previous objections to major development on this site (16/0473/PPP), which were largely supported by DPEA Reporters.**

- ii. The DPEA Reporters' Notice of Intention in respect of the above appeal (30 April 2018) states ... *The appellants confirmed ... that they did not intend to construct any housing on the greenbelt and accordingly, would accept the matter being regulated by either a condition or planning obligation expressly prohibiting housing on the greenbelt.*

**The current application would appear to directly contradict the above assertions.**

Also in 2018, the applicants commissioned the excavation of extensive trenches across the site for archaeological investigations. The ground has still not been reinstated, resulting in blighting of the landscape with the apparent intention of giving the site the appearance of a brownfield site suitable for development.

**The Community Council is now seeking action by the planning authority to require the developers to restore ground conditions and, thereby remove the hazards to public safety arising from the open and unsigned trenches** (see 'Restoration of Ground Conditions and Amenity' below).

## **DETAILED REASONS FOR REFUSAL OF APPLICATION 21/04210/PPP**

### **a. Erosion of Green Belt**

Both the current LDP and Proposed City Plan identify the site of the proposed development as within green belt. The site's green belt status was emphasised in the planning authority's refusal of the West Craigs North component of application 16/04738/PPP.

The green belt and countryside character of this area is greatly valued by residents of Cammo, Barnton and East Craigs for its scenic values, countryside character and recreational access and will be much appreciated by the 2,500+ residents of the new Maybury and Cammo developments.

Further erosion of the green belt is strongly opposed by the local communities, as –

- it would adversely affect the local landscape and open countryside character;
- result in coalescence of recent major developments at Maybury and Cammo and conflict with the green belt's purposes of preventing unrestricted growth and incremental spread of built up areas;
- resultant green belt boundaries would be much less robust and more permeable than the current northern and eastern boundaries along Craigs Road and Maybury Road.

The proposed development would be contrary to –

- the spatial strategies set out in SESPlan, the current LDP and Proposed City Plan.
- LDP Policies Hou 1(2b.) Housing Development and Proposed City Plan Policy 4 Housing Land Supply – which require that any new development in the green belt or countryside should not to undermine green belt objectives and should safeguard landscape character;
- LDP Policy Env 10 Development in the Green Belt and Countryside and Proposed City Plan Policy Env 18 Development in the Green Belt and Countryside.

#### b. Impacts on Landscape Character and Designated Sites

The West Craigs North site is a key 'green' and rural component of the local landscape with the Craigs Road ridge and Pentland Hills beyond being prominent in views southwards from parts of the new Cammo Meadows and established Cammo residential estates, Cammo Estate parkland, proposed Cammo Walk green corridor and active travel route, and the Mauseley Hill and iconic Cammo Water Tower.

Development of the application site – in particular 2- and 3-storey housing and 4-storey tower on eastern parts of the site and on higher ground towards the Craigs Road ridge, will diminish views westward towards Mauseley Hill and Cammo Water Tower from sections of Maybury Road, Cammo Walk and East Craigs residential areas and be diminish the scenic values and enjoyment of the Special Landscape Area and Cammo Estate Historic Gardens and Designed Landscape Inventory Site.

It is noted that **Proposed City Plan Policy Place 22 Maybury** includes the principle that ***Development must respect the ridgeline of Craigs Road and elevated slopes within the site.*** CBCC considers that this principle should be applied in assessing the current application and does not accept that the proposed layout and heights of proposed homes adequately respect the Craigs Road ridgeline (see accompanying photos).

**City Plan 2030 Housing Study (2020) confirms the CC's assessments of the proposed development's unacceptable impact on landscape character.** It states ... *No scope is identified for development on this site due to its prominence in views from Cammo, Barnton and from the A8 and A902, the requirement for considerable and visually intrusive ground modification and its provision of an important undeveloped backdrop to the allocated developments at Maybury and Cammo.*

The proposed development is, therefore, contrary to –

- LDP Policies Des 9(a) Urban Edge Development, Env 7 Historic Gardens and Designed Landscapes and Env 11 Special Landscape Areas;
- Proposed City Plan Policies Env 15 Historic Gardens and Designed Landscapes, Env 19 Special Landscape Areas and Env 28 Urban Edge Development.

#### c. Traffic Generation

It is recognised that current studies are being undertaken to provide enhanced active travel facilities and improve traffic management on the Maybury Road network and the efficiency of Maybury and Barnton Junctions. However, the CC does not accept that the applicants' traffic assessments and assertions that marginal increases in traffic generated by the development are insignificant, as–

- a. statistically, the additional traffic generated by the West Craigs North development at peak times [e.g. estimated 149 pcus (passenger car units) at AM peak; 142 pcus at PM peak] may appear marginal. However, this will inevitably result in additional queuing and travel delays on Maybury Road and its key junctions, which already operate near/at/over-capacity during much of the day. This congestion has significant economic and air quality impacts;
- b. the substantial recent increases in housing allocations for West Edinburgh in City Plan 2030 are unlikely to have been fully taken into account in traffic modelling. These will generate significant additional traffic pressures on Maybury Road and its junctions;

- c. the introduction of a new (potentially signalised) arm at the East Craigs roundabout to serve the development, alongside active travel improvements and new crossings on Maybury Road, and additional bus services (e.g. Orbital service proposed in City Plan) will cause further congestion on Maybury Road and at its key junctions;
- d. insufficient consideration has been given to increases in courier and food delivery traffic and other traffic resulting from changing household behaviours pre-Covid and exacerbated by Covid, which are likely to be continuing.

**This application does not adequately comply with –**

- **LDP Policy Tra 1(d) Location of Major Travel Generating Development and Tra 8 Provision of Transport Infrastructure.**
- **Proposed City Plan Policies Inf 3 Infrastructure Delivery and Developer Contributions and Inf 4 Provision of Transport Infrastructure.**

#### **d. Air Quality Issues**

The site is within close proximity to Braehead composting site which operates 7 days a week. The applicants' assessments include sniff tests in November and assume that the prevailing wind will keep the development site free from unpleasant smells. These are misleading, as odours from the composting operations are highest in warm weather and can build up in the area around the composting site in calm weather, with the local topography occasionally channelling unpleasant odours towards the site. Such odours would be unacceptable to residents wishing to spend time outdoors around their properties.

Hence the Community Council supports the **Council's Environmental Protection Team (16/11/20) response to the Scoping Opinion Request, which stated ... Odours are another issue due to the nearby composting facility. A condition would need to be applied to ensure that before any development started the composting facility will need to cease operation, buildings demolished and SEPA permits cancelled.** The site remains zoned for composting in proposed City Plan 2030 and there is no reason to assume that it is likely to be closed in the near future.

**The proposed development is clearly contrary to –**

- **LDP Policy Env 22 Pollution and Air, Water and Soil Quality;**
- **Proposed City Plan Policies Env 33 Amenity, Env 34 Pollution and Air, Water and Soil Quality and Inf 17 Safeguarding of Existing Waste Management Facilities.**

#### **e. Loss of Prime Agricultural Land**

The site comprises Category 2 and 3.1 prime agricultural land, which until the recent excavation of archaeological survey trenches grew arable crops. **While the current West Craigs and Maybury developments may have resulted in the land at West Craigs North becoming an uneconomic unit for traditional arable farming, the land remains capable of supporting some forms of agricultural or horticultural production, including commercial or community food growing.**

#### **f. Capacity of Strategic Sewer**

The River Almond strategic sewer overflows at several points between Cammo and Cramond pumping station during severe rainfall events. **This development would pose additional loading on the strategic drainage infrastructure which is operating over-capacity at times.**

## **ROADS AND TRAFFIC MANAGEMENT ARRANGEMENTS SHOULD APPROVAL BE RECOMMENDED**

**Should the planning authority be of a mind to approve of the current application, then the Community Council would wish the following issues to be considered as the basis of amendments to the application or conditions of consent –**

- i. adoption of an ‘Infrastructure First’ approach** – the current lack of progress by the City Council on traffic management and infrastructure improvements in North West Edinburgh, including delays in LDP Action Programme projects (e.g. Cammo Walk, Barnton Junction), do not assure the community that proposed traffic management measures intended to assist delivery of the proposed development will take place timeously. **Should this development be approved, this should be conditional on an ‘Infrastructure First’ approach, with all necessary traffic management and roadworks, in particular the East Craigs Roundabout link road, being completed before house building commences;**
- ii. Cammo Walk Traffic Management** – Ever since first sight of the HSG 20 Cammo Development and associated traffic management arrangements, the Community Council has argued that Cammo Walk between Craigs Road and Cammo Estate South Car Park should either be –
  - closed to traffic to enable active travel provision, conditional on traffic lights being installed at the Maybury Road/Cammo Gardens Junction to prevent substantial community severance, resulting from the significant proportion of residents who are unwilling to, or extremely apprehensive of, using the above junction due to traffic hazards; or
  - be kept open to southbound vehicles with a separate active travel corridor.

The lack of a firm commitment by the Council on the future of Cammo Walk over the past 8+ years has led to the current, so far inconclusive, Community Participation Request discussions between Council and CBCC representatives.

**Prior to any approval, the Council should make a commitment on future traffic management arrangements for Cammo Walk based on one of the two options outlined above.**

The applicants’ Illustrative Masterplan appears to show no vehicular access retained on Cammo Walk, whereas their separate application 21/02306/PPP shows the option of southbound traffic continuing to along Craigs Road to a new junction on Craigs Road, as opposed to joining Maybury Road via a link to the East Craigs Junction.

**Should agreed traffic management arrangements for Cammo Walk retain southbound traffic between Cammo Estate South Car Park and Maybury Road, traffic arrangements should –**

- a. provide a Cammo Walk southbound traffic joining Maybury Road at the proposed East Craigs Roundabout link road, with a left turn (eastwards) towards the Maybury Road to prevent rat-running on Cammo Walk, but no right turn (westwards) into the West Craigs North estate and or other residential developments at West Craigs, Maybury and Turnhouse and the Turnhouse Air Freight Depot;**
  - b. exclude any other vehicular links into the proposed development from Cammo Walk, to prevent rat-running, as in a.**
- iii. Housing Layout**

The current layout largely restricts views across the site from Maybury Road to Mauseley Hill and Cammo Water Tower to a narrow landscape corridor and locates housing on higher land in the vicinity of Craigs Road which would be dominant in the landscape.

**Prior to any planning approval, the proposed housing layout should be**

- a. modified to increase views through the site from Maybury Road to the important Mauseley Hill and Cammo Tower landscape features;**
- b. housing on high sections of the site, which would intrude on the Craigs Road ridgeline, should be removed from the proposed development layout.**

## **REQUEST FOR ENFORCEMENT ACTION TO REQUIRE RESTORATION OF LANDSCAPE AND AMENITY VALUES AND REMOVAL OF SAFETY HAZARDS**

Should the planning authority decide to refuse this application, this will not remedy the loss of amenity and safety hazards to people accessing the site under Scotland's rights of responsible access, due to the extensive archaeological excavations across the site undertaken two to three years ago. There is no evidence of the developers' intending to infill the trenches and reinstate the previous ground levels, as a result –

- i. productive use of the land cannot be restored until the trenches have been infilled;
- ii. the visual landscape qualities of the site and its values for recreational access have been substantially diminished;
- iii. the extensive, open and, in many cases, partially or wholly water-logged trenches, many of which are partially obscured by vegetation, pose hazards to the safety of local people who visit the site for walking or other pursuits (e.g. nature watching). For example, children have been observed in winter treading on variable levels of ice covering waterlogged trenches of 0.5-1.5 metres in depth, without recognising the hazards involved.

**Should the planning authority refuse the current planning application, CBCC would encourage it to serve an Amenity Notice, under s.179 of the 1997 Planning Act, requiring the landowners to infill all trenches across the site and reinstate ground levels; thereby, restoring some of the amenity and landscape qualities of the site and removing the safety hazards posed by the often waterlogged trenches** (see attached photos).

Representatives of the Community Council will be pleased to discuss or clarify any aspects of this submission.

Yours sincerely,

John Loudon  
Chairperson, Cramond & Barnton Community Council



Extensive trenches excavated in 2018 and 2019 cover site.

Houses on higher land would be intrusive on Craigs Road ridgeline.



Trenches are up to 1m deep. Several are waterlogged.

Children were observed playing on thin covering of ice in winter '20/21.



Trenches obscured by vegetation pose hazards.