

Craigeleith/Blackhall Community Council Draft City Plan 2030 - Consultative Draft

Background

1. To quote para 1.6 of the Plan, the “City Plan 2030 is our Local Development Plan for Edinburgh for the period 2022-2032. A Local Development Plan protects places of value, sets out locations for new homes and businesses, and ensures essentials for a good quality of life are in place - such as public transport, active travel, schools, healthcare and green space.”
2. Underpinning the Plan are over-arching objectives to respond to climate change and for the city to achieve net zero by 2030; to eliminate poverty by ensuring residents have access to work, learning and training opportunities and have a good place to live - and a commitment to build 20,000 affordable and low cost houses; to build new homes to the highest emission quality standards, connected neighbourhoods in the right locations and with the right infrastructure; to support businesses and promote an inclusive well-being economy.
3. The draft Plan says these objectives will be achieved by :-
 - delivering a network of 20-minute walkable neighbourhoods embedding a place based approach to the creation of high quality, high density, mixed use and walkable communities linked by active travel and public transport infrastructure;
 - directing new development to, and maximising the use brownfield land, rebuilding the city from within and delivering new communities in Edinburgh Waterfront and West Edinburgh;
 - setting out place policies, development principles and preparing place briefs;
 - requiring all new buildings to be net zero;
 - implementing environment policies to deal with climate change mitigation and adaptation including reducing flooding and other climate impacts;
 - securing 35% affordable housing contribution from new developments;
 - protecting residential amenity by presuming against the loss housing to other uses and ensuring any uses in residential areas are appropriate; and
 - adopting an infrastructure first approach, addressing future healthcare and education requirements and to deliver key economic land use needs.

What does this mean for Craigeleith and Blackhall ?

4. Both Craigeleith and Blackhall are well established residential areas. The scope for major change is limited other than one or two large sites such as the

former Royal Victoria Hospital site, the Crewe Road South Police Scotland Fettes site, albeit in Stockbridge CC area but with significant implications for the adjacent part of our CC area. Additionally the Plan recognises the scope for modest housing increase adjacent to Orchard Brae House on Orchard Brae Avenue and the renewal of Finance House on Orchard Brae for housing, also in the Stockbridge CC area.

5. Elsewhere in the CC area the Plan recognises locally important sites valued by the local community such as Hillhouse Road Woods opposite Blackhall Library and the horse field on Craigmillar Road both shown as open space and green belt respectively. The open site at the junction of Craigmillar Road and Queensferry Road is also safeguarded as open space.

6. The Plan also provides the policy framework for future change at the Craigmillar Shopping Centre.

7. Additionally it provides for a peripheral bus route - with the preferred route in the Plan being Queensferry Road, Quality Street, Main Street, Ferry Road and Pennywell Road in north Edinburgh. Within Craigmillar/Blackhall Community Council area there are 2 future tram routes safeguarded. These are the line of the Roseburn Path and Crewe Road South / A90 serving Comely Bank and Western General Hospital.

Royal Victoria Hospital (Place 5) and Crewe Road South (Place 6) Sites

8. Both sites are covered in the Plan by specific and detailed Place Policies. For the former hospital site on Craigmillar Road, the Plan states :-

“Planning permission will be granted for development within the boundary of Royal Victoria Hospital, as defined on the Proposals Map, provided it accords with the Royal Victoria Hospital Development Principles.

3.34 Proposal to provide housing-led mixed use on this former hospital site. The site contains two listed buildings (the East Lodge and Hospital Administration building) and designated open space lining the southern boundary. The entire site is covered by a Tree Preservation Order. It lies within the view cones of Protected City Views.

Proposals will be expected to:

- a. Deliver a housing-led mixed-use development in line with the density requirements in Part 4, Table 2.
- b. Incorporate small-scale retail (no larger than 250 sq m) and class 2/3 uses, proportionate to the needs of future residents, as an integral part of the design,
- c. Improve the setting of the listed buildings using analysis of historic garden and landscape structure to inform design and layout of open space, movement routes and public realm,
- d. Make iterative use of topographic and view analysis (including views within the site) to inform height and massing, and to integrate development into the setting of the listed buildings and the wider context,
- e. Demonstrate pedestrian priority throughout, providing limited private car parking, all on-street,

- f. Line all new routes and open space with active frontages that promote pedestrian movement between inside and out and enable good passive surveillance at ground floor level,
- g. Provide new active travel infrastructure: Active Travel Route: Royal Victoria Hospital to Roseburn Path via Quiet Route 20 and New active travel crossing: Craigleith Road at Orchard Drive,
- h. Retain and enhance designated open space as public greenspace. Use selective tree thinning and minor adjustments to boundary walls to improve visual and physical connections to and through the site,
- i. Ensure design and layout of streets and spaces incorporate key views towards listed buildings and surviving historic features (landscape and built form). Design active travel links to incorporate green blue infrastructure, including tree- planting,
- j. Retain mature trees and stone walls. Consider appropriate re-use of non- designated heritage asset (stable block) in north west corner of the site,
- k. Integrate site history interpretation into public realm design,
- l. Integrate new outdoor play facilities into the site layout in a well overlooked and accessible location with a welcoming setting that provide for a range of users, including those with disabilities (see Proposal BGN 36)
- m. Take contemporary surface management proposals in this sewer catchment area into account in designing the site layout and corresponding surface water management plan, particularly in relation to ongoing work lead by the Edinburgh and Lothians Strategic Drainage Partnership,
- n. Provide or contribute towards education, and healthcare infrastructure and community facilities.”

9. Do these principles provide for adequate safeguards for the community interest ?

10. With regard to the **Crewe Road South (Policy Place 6)**, the Plan states :-

Planning permission will be granted for development within the boundary of Crewe Road South , as defined on the Proposals Map provided it accords with the Crewe Road South Development Principles.

3.35 Proposal to provide housing-led mixed use on a site which currently comprises a mix of commercial uses and substantial greenspace. The site is adjacent to the Inverleith Conservation Area and there are listed buildings and structures adjacent to the site as part of Fettes College and at Avenue Villas. The site lies within the view cones of Protected City Views. It contains two electricity substations.

Crewe Road South Development principles

Proposals will be expected to:

- a. Deliver a housing-led mixed-use development in line with the density requirements in Part 4, Table 2.
- b. Respect green landscape setting of Inverleith Conservation Area, in particular dominance of landscaped open space and its relationship with built form. Retain and enhance

greenspace on northern and eastern boundaries within a new structure of tree/woodland planting and blue-green infrastructure. Reinforce existing green network between Comely Bank Cemetery and Inverleith Park and enable potential for new allotment space,

- c. Incorporate existing mature trees and other significant vegetation into site layout,
- d. Create a strong urban form, including ground floor commercial uses, at the corner of Crewe Road South and Comely Bank Road equivalent in scale to a 4-storey tenement,
- e. Make provision for a potential new Annexe to Flora Stevenson Primary School (0.8ha),
- f. Create a permeable network of streets and paths that increase active travel links to facilities such as Western General Hospital, Inverleith Park and public transport stops,
- g. Line all new routes and open space with active frontages that promote pedestrian movement between inside and out and good passive surveillance at ground floor level,
- h. Provide active travel infrastructure: New Active Travel Route: Crewe Road South from Orchard Brae Roundabout to Crewe Toll; link from Victoria Hospital site to Carrington Road (Quiet Route 20) ensuring safe crossing of Crewe Road South and new Active Travel link: along Fettes Avenue from Comely Bank to Carrington Road,
- i Incorporate a mobility hub in a prominent location with high footfall and good passive surveillance. Provide direct links for active travel between this hub and public transport stops. As a minimum, the hub should incorporate bike/e-bike cycle hire point (19 docks approx. 14.5m x 2m) and car share opportunities,
- j. Demonstrate pedestrian priority throughout, providing no or very limited private car parking apart from accessible parking spaces and vehicular access for servicing and deliveries,
- k. Make iterative use of Townscape and Visual Impact Assessment to identify footprint, height and massing of built form, respecting existing townscape, landscape and conservation area setting and surrounding residential character (predominantly 2-3 storey villas, townhouses and tenements),
- l. Adjust height and create new openings in stone wall lining Crewe Road South to provide an active frontage and improve visual and physical connections to and through the site.
- m. Address potential requirement to re-locate gas infrastructure (District Governor, gas main) in north western corner.

Incorporate a new open river channel that maximises riparian habitat and reduces overall flood risk from the culvert to the north of the site by diverting the stretch of the existing culverted watercourse that is north of the site from Crewe Road South (at the North West corner of this site) up to the junction of Carrington Road at its junction with Fettes Avenue (at the North East corner of this site). The diverted watercourse shall be routed to run inside the northern boundary of the site as shown the site brief diagram. As part of this, the developer shall upgrade any remaining length of culvert between where the open watercourse enters the culvert under Crewe Road South, and the new open river channel within the site. The developer shall coordinate with Scottish Water, SEPA and City of Edinburgh Council regarding the planning, design and delivery of this diversion (see proposal BGN20), and,*

n. Take contemporary surface management proposals in this sewer catchment into account in designing the site layout and corresponding surface water management plan, particularly in relation to ongoing work lead by the Edinburgh and Lothians Strategic Drainage Partnership

11. Do these principles meet the concerns of local residents, particularly the issue of flooding as indicated in italics above ? (*above - it has not been possible to copy the diagram which is on page 58 of the draft City Plan.)

12. These sites and others in the Comely Bank corridor are estimated to provide the following number of housing units:-

H31 Royal Victoria Hospital -360 units. Former hospital site proposed for housing-led mixed-use development. Proposals should accord with the Royal Victoria Hospital Development Principles set out in Place 5.

H32 Crewe Road South - 256 units. Proposal to provide housing-led mixed use development. Development should accord with the Crewe Road South Development Principles set out in Place 6. A density range of 60-100 dwellings per hectare should be achieved.

H33 Orchard Brae Avenue - 55units. Development should accord with Development Principles set out in Appendix D.

H34 Orchard Brae 124 units. Development should accord with Development Principles set out in Appendix D.

13. It should be noted that the site at Orchard Brae Avenue (ie development in part of the car park at Orchard Brae House) has been the subject of planning applications which have generated objections from local residents. There could be local concerns about this proposal.

Other Sites

14. Other sites which currently or in the past that have generated concerns from the community are Hillhouse Road Woods, the undeveloped site at the junction of Craigcrook Road and Queensferry Road, and the horse field on Craigcrook Road.

15. **Hillhouse Road Woods** (opposite Blackhall Library) which was the subject of a planning application for a care home in 2017 continues to be shown and safeguarded as open space and covered by policies Env 23 - Protection of Open Space and Env 24 Protection of Outdoor Sports Facilities. The continued protection of the site as open space is most welcome. While policy Env 23 is most relevant to the protection of the site, policy Env 24 is not relevant to this site. Policy Env 20 - Protection of Trees and Woodlands is far more relevant to this particular site, given the tree cover and the protection from a Tree Preservation Order. Policy Env 21 Protection of Biodiversity could arguably also have more relevance than indicated in the Plan.

16. With the exception of protection of biodiversity, similar comment applies to the site at the junction of Craigcrook Road and Queensferry Road.

17. The **horse field at Craigcrook Road** continues to be identified as green belt covered by Policy Env 18, as well as Corstorphine Hill Special Landscape Area

Policy Env 19, Local Nature Conservation site Policy Env 21, a local biodiversity site - Corstorphine Hill and Ravelston Wood, and Open Space Policies Env 23-24. This level of protection is to be welcomed.

18. Further site which will be the subject of a planning application in the future is **Ravelston Park**. As well as being safeguarded by open space policies, it is recognised as a local biodiversity site and part of the local conservation site. The protection of open space (Policy Env 23) provides for the loss of open space in particular defined circumstances including where development would be for a community purpose.

Conclusion

19. Some local concerns have been addressed positively in the draft City Plan 2030 and are to be welcomed eg the issue of flooding at Crewe Road South and the continued protection of both Hillhouse Road Woods and Craigcrook Road horse field. There may be a question whether the Plan could go further and this would be a matter for discussion at the meeting on Monday.

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