

February 15th 2008
Submitted via e-mail

Dear Sirs,

Planning Application 08/00007/OUT

I am writing to object to this application in its present form. I believe the current application represents overdevelopment of the site and breaches the North West Edinburgh Local Plan, previous planning consents for this site, and the original planning brief for the site. I hope the Planning Committee will reject this application and ask the applicant to enter into full and proper consultation and negotiations with the local community, its representatives, sportsScotland and Council officials to bring forward an application which delivers sustainable community sports facilities.

Background

My involvement with the development of Cramond Campus stretches back more than a decade. As the local ward councillor and as a local resident, whose family made use of the sports facilities at the Edinburgh University campus, I was acutely aware of the impact the loss of facilities such as the swimming pool and meeting rooms would have on the Cramond community. At the time, I worked with Council officials to put together a planning brief for the Campus site and at the heart of that document was the desire to keep greenspace available, and to provide sports facilities for the local community.

At the point when the University put the site out to tender, all applicants were made aware of the planning brief and their tenders were to be submitted accordingly, taking the provisions required into account. Therefore, from the outset of this housing development AMA/Bryant knew that part of the site was not to be developed for housing but was to be kept for sporting and ancillary uses and there would be a cost associated with this. I have no doubt that their bid to the University reflected the commercial reality of that stipulation.

Nevertheless, over the years the Campus site has been developed by AMA/Bryant and, in keeping with the location and Edinburgh housing inflation, the homes have been very expensive. There is little doubt in my mind that the sports facilities and pitches required should have been funded from the residential element of this development, and it is perhaps unfortunate that some form of Section 75 or other legal agreement was not entered into with the Council earlier in this process when approval was given for the housing element.

Over the past few years I have worked with Cllr MacKenzie, the Cramond Association, the Cramond Community Council and local residents to try to achieve a development which reflected the aspirations and requirements of the community. The developer's original application for a country club on this site was rejected by the community at public meetings and, ultimately, by the Planning Committee. The present application has approximately the same

footprint as that earlier scheme, only this time it's not all sports facilities. An alternative approach in terms of a small pavilion was also rejected but the application for five pitches was accepted. Sportscotland have been clear throughout the process that they required five pitches (four grass and one artificial) to be put in place to replace the pitches that were lost. I have spoken to sportscotland recently and would confirm that this remains their position.

Condition 16 – the “50%” rule

I understand that applications regarding the pavilion and a request to ease planning condition 16 of the original 2003 consent are in abeyance while this outline application is considered. I am aware that AMA are attempting to get Council approval to remove the safeguard condition that no more than 50% of the housing on this site can be occupied before the sports pitches and facilities are operational. I would urge members of the Planning Committee to resist these attempts strenuously. This condition gives the community the leverage to make sure, with Council assistance, that the promised sports facilities are actually delivered. If this condition were to be relaxed or withdrawn the developer could, theoretically, build the rest of the houses on the site and walk away from the sports facilities and pitches completely. Clearly, the Council has different options at its disposal including Section 75 agreements and planning conditions and I would suggest that these should be put in place at the relevant time in the process.

The Current Application

I believe that the current application represents an overdevelopment of the site as well as being in breach of the North West Edinburgh Local Plan in respect of retail and office development. I also believe that SPP11 which looks at Open Space says that playing fields and pitches should only be redeveloped in certain circumstances, e.g. when the development is ancillary to the principal use of the site as playing fields. While it seems clear that a pavilion is ancillary, and is debateable that some of the offices could be ancillary if used by sports clubs or community organisations, a supermarket and a care home are not ancillary.

The applicant is attempting to put forward the proposal that the sports facilities can only be delivered via cross subsidy from other commercial operations on the site. While I believe that the applicant was well aware of their obligations to the community when they had their bid for the site accepted, I am keen to see progress being made on this site. Bearing that in mind I believe that the majority of local residents are prepared to consider some other facilities on the site if the Council puts in place the necessary legal agreements to secure the funding for ongoing maintenance of the sports pitches and the pavilion.

Having received representations from constituents, spoken at the well attended public meeting in January, attended the AMA exhibition and met with

local elected representatives and bodies over the past few weeks, there is no clear community view in terms of what facilities people would support at this stage so I would ask the Council to reject this application and allow further discussions to take place. There are elements of the application which appear to be more acceptable than others but many of the component parts have raised concerns.

Sports Pavilion

I believe the sports pavilion is broadly acceptable but would prefer to see it expanded to include more space for a gym and a larger dance studio for community use. Some residents believe that there are too many showers etc and not enough other sports facilities. The offices within the pavilion could be used by local community groups, sports clubs and ancillary health/sports uses e.g. physiotherapists. I believe that the community and sportscotland should be involved in the detailed design of the pavilion. The original closure of the Campus deprived local groups of one of the few local buildings where meetings could be held. I am sure that local organisations and the community would make good use of these facilities and would prefer to see a pavilion, pitches and other green space held in trust by the community or by the Council for community use.

I believe the Cramond area has a enviable reputation of community involvement and that the local organisations would be able to undertake voluntarily many of the duties involved in the long term future of this sort of project. This would obviously be dependent on a certain amount of funding being put aside by the developer to pay for the ongoing maintenance of the sports provision. The community require input from sportscotland and Council officials to make sure that the amount set aside is reasonable to ensure ongoing viability. In the past I believe the figure of £1 million was discussed with the developer by Council officials, however I am not aware of any signed agreement on this matter. Such a figure would seem to me to be extremely generous to the developer given that some of the houses built already on the site have sold for more than £1million each.

If the Council isn't minded to attach such a condition to secure the ongoing future of these sports facilities in community or council management, could I suggest that the Committee look at some sort of safeguarding condition which makes it clear what sorts of developments e.g. retail or housing, would **not** be acceptable on this location in the future, thereby taking away any perverse incentive there might be for the developer to not maintain or manage the sports facilities effectively.

Given that there is meant to be a nursery in this building, a children's playpark and garden attached to or adjacent to the pavilion would be useful. While I believe that the pitches have already secured planning permission it has been pointed out to me that they would certainly benefit from more space around them and are currently cramped. If the retail element were to be dropped there would be more space available to revisit this issue.

Care Home

While I am personally of the view that a local care home might be a positive development in Cramond, I am aware of concerns about the scale and height of the building; the fact that it breaches planning guidance and questions about the viability of such a project. I am also concerned at the lack of garden and green space around the proposed care home, especially given the needs of home residents. There may also be an issue about the proximity to floodlit pitches. There are also concerns about the ability of local GP surgeries to cope with the extra workload involved, particularly when the Davidsons Mains surgery has already taken moves to restrict new entrants to their list. My general feeling is that a care home is potentially more acceptable to many residents than other elements of the scheme, but only on the understanding that such development helps to sustain the community and sports facilities and is not simply a profit making venture for the developer on land set aside originally for green space and sports provision.

Retail Element

It is the retail element of the proposals that appears to be the most unacceptable to local residents. There are a number of areas for concern. This would totally change the ambience of this area of green space. There would be little or no community gain as the area is well served with supermarkets within a short distance by car, therefore in terms of Structure Plan policy RET2 I would suggest there is no present deficiency.

The location of this supermarket on the edge of Cramond would not lead to large numbers of residents walking to the shop, however it is quite likely that it would have a detrimental impact on the viability of the current small local shop/post office on Whitehouse Road at the top of School Brae. I would take issue with the figures used in the GVA Grimley Retail Statement which suggest that while the proposed supermarket and second shop would take trade from the Tesco at Davidsons Mains and the Scotmid at Barnton; it would not take any trade whatsoever from a small local shop which is much closer to this proposed location. I trust the Committee will question the applicant on this matter.

Again in terms of SP Policy RET2 and Policy RET 5 of the finalised City Local Plan I would suggest this scale of retail development would have a negative impact on the vitality or viability of a small local shop which is currently used by many elderly local residents. The smaller proposed shop is assumed to take all of its trade from the catchment area and might then be assumed to have an impact on a small local shop/newsagent/post office. There would be little in the way of pass by trade that could not be catered for at the Barnton or Davidsons Mains shopping centres, so I would question the assertion that 10% of trade for the supermarket would come from that source. It is also worth noting that the retail study is out of date because the Iceland store in Davidsons Mains has been closed for some time, and is now a tile shop. The suggestion that 76% of the supermarket's trade will come at the expense of much larger supermarkets such as Tesco in Corstorphine or Sainsburys at

Craigleith Road, when both these stores have a much wider selection and are situated alongside other retail units on major roads is open to debate at the very least.

I see nothing to commend the inclusion of a retail element in these proposals. These represent a total departure from the Planning Brief and the previous applications, and I do not believe they are justified. The developer will suggest that this level of development is required to cross-subsidise the sports facilities, but I am not aware that any figures have been produced by the developer to support this claim. I am not adverse to some form of cross-subsidy but I would prefer to see something which is more in keeping with the local environment and requirements. I hope the Committee will request to see evidence that this level of overdevelopment is required to provide the proposed facilities, bearing in mind the profitability of the housing which has been built, and that which has yet to be built as well. This is only part of the original site, and I hope the Committee will bear in mind that this part of the site was never intended for anything other than sports or ancillary use.

A 10,000 sq. ft supermarket appears to me to represent overdevelopment and the presence of the supermarket/shop/offices also leads to an unacceptable level of car parking (256 spaces), compared to the amount of parking which would be required to serve a small pavilion and a care home. Such a level of car parking would increase traffic in the area, and would again totally change the local environment. I am not aware of any disabled spaces on the plans. I am also concerned about the narrowness of the pavement on Cramond Road North given the proposed size of this development.

Many residents are also concerned that a supermarket, with an off sales licence, could attract groups of people to hang around what is currently a quiet area. Clearly if such a development was to go ahead it would be necessary to impose conditions in terms of opening times and times when loading etc was acceptable because of the proximity to the flats on Cramond Road North. The developer has suggested that a care home would require a shop nearby and while I accept that access to shops is an advantage, the home would be on a direct bus route to supermarkets at Davidsons Mains and Barnton, therefore I think an adjacent shop is unlikely to be a stated requirement.

Consultation

Over the years there has been a limited amount of consultation with local residents, much of it through the auspices of local politicians and organisations. AMA did send questionnaires out to some local residents some years ago, but prior to the lodging of this application, there was no pre-application consultation with the wider community that I am aware of.

However, I welcome the fact that the developer attended a Community Council run public meeting on the 17th January and had an exhibition of their proposals in the Kirk Halls at the beginning of this month following a request from local councillors. I have continued to correspond and meet with Mr Mike Afshar of AMA to discuss the development over the years. I met with Mr Afshar on 7th November 2007 to discuss the project and suggested that he should meet with the Community Council and the Cramond Association to explain his plans. I believe he subsequently spoke to their representatives on the phone and that he had previously discussed his plans with Cllr MacKenzie.

At no time at this meeting did I intimate to Mr Afshar that I was in support of his proposals. Therefore, I was extremely disappointed to say the least to see such an assertion in the documents supporting this planning application when I read them on the Council planning portal. Support was also claimed to be in place from Bill Scholes, Chair of the Community Council; Kay Wallace, Secretary of the Cramond Association and Cllr MacKenzie. Having discussed this matter with all of them I believe that none of them are in support of the proposals as they stand. I believe all of us have intimated as much to relevant planning officials.

I'm sure members of the Planning Committee know me well enough to know that if I was supportive of this proposal I would say so and would do so having seen the finalised plans as lodged, and having taken on board the views and comments of local residents and representative bodies.

Conclusion

While there are different views on the best use of the site amongst residents there is unanimity on the need for the Committee to re-iterate the previous planning Condition 16 in relation to the need for the sporting facilities to be in operation prior to more than 50% of the housing provision being occupied. Without this safeguard, the community will suffer more construction and traffic without any benefit being delivered. I would urge the Committee not to relax this condition in any way.

However, as I said previously, there is a need to make progress on this site. I hope that Committee members will reject this current proposal and suggest that the developer work with the community, including local young people, with professional input from sportscotland, and council officials to deliver a sustainable solution which represents the spirit of the planning brief, acknowledges the need for a pragmatic approach to acceptable forms of cross-subsidy, and investigates means by which the sports facilities can be maintained in some form of community or council management or ownership, with a financial contribution having been made by the developer. This is, I believe, a better way forward than being faced as a community with a fait accompli approach, backed up by the suggestion that if the community doesn't accept this proposal in its entirety the undeveloped part of the site will fall into a terrible state of neglect.

I trust the Planning Committee will continue the approach taken by previous Committees in trying to deliver and safeguard the sporting and community facilities and space the community was promised. After almost a decade of discussion and development, of increased pupil numbers in the local Primary school, and increased traffic on local roads, the community has yet to receive any of the hoped for or promised community gain.

There are a number of elements to these proposals, some of which I am more sympathetic towards than others. However, I wish to object to this particular proposal as it currently stands.

Yours sincerely,

Margaret Smith MSP
Edinburgh West