

Leith Docks Development Framework– Responses to draft development framework

APPENDIX 3

ORGANISATION	COMMENT	RESPONSE
BAA plc	<p>BAA stated that the following aspects of development in the framework area could give cause for concern to Edinburgh Airport:</p> <ul style="list-style-type: none">• Flat roof developments which birds could use. Access to roofs to remove nests will be necessary.• Water parks could have the potential to attract hazardous birds to the area, depending on their design and size.• Wind turbines could interfere with navigational equipment and will need to be assessed by BAA's navigational aid consultants.• Food outlets, public areas, the incorrect disposal of putrescible waste and the feeding of birds should be designed out.• Certain types of landscaping have the potential to attract hazardous birds and should be designed out.• Sustainable Urban Drainage Systems should be designed so as not to increase the birdstrike risk to the airport. <p>BAA referred to the possibility of a 140m high building, stated that the ground level in the area is between 2m – 5m AOD giving the overall height of such a building as 142m – 145m AOD. This is approx. 35m below Edinburgh Airport's Outer Horizontal Surface and such a building height would therefore not be a problem for Edinburgh Airport. However, obstacle lighting on such a building may be required and construction cranes may require obstacle lighting.</p>	<p>Noted. These issues will be more appropriately addressed at the detailed design stage.</p> <p>Noted.</p>
Cyclist's Touring Club (CTC) Scotland	<p>CTC stated cyclists' basic aspiration for a cycle route which follows the shoreline and avoids main roads, and identified a western extension of Marine Esplanade as an opportunity</p>	<p>Noted. The finalised framework identifies several such routes.</p>

to provide such an east-west route.

East Lothian Council

ELC stated that the draft development strategy responds positively to the existing amenities of the site and surrounding area. ELC responded in more detail to the list of additional questions to consultees, identifying general points of good practice is sustainability.

Noted. Sustainability targets are set out in Annex A to the framework.

Edinburgh Community Safety Partnership

ECSP requested that the framework include:

- A requirement to consult with Lothian & Borders Architectural Liaison Officers, and that their recommendations be adopted prior to planning approval.
- A requirement that developers and planners are able to demonstrate an understanding of current and future Community Safety Strategy priorities.
- A requirement that developers work closely with key public service providers and consider the potential increase on public service resources as a result of large-scale development in Leith Docks.

Noted. The framework's Masterplan Consultation Groups list includes the L&B ALO and the ECSP.

Edinburgh Green Party

EGP welcomed the prospect of developing the area for a mix of residential, commercial, retail and industrial use but stated its extreme alarm that the whole philosophy of the present project appears to be to develop the waterfront with more consideration for immediate profit rather than long-term benefit to the city as a whole.

EGP stated that the opportunity presented by the waterfront should not be undermined by a piecemeal approach and emphasised the importance of planning for marine activities.

EGP stated that building massive structures up to 40 storeys high will not contribute to the creation of a vibrant urban maritime hub and cited the ex-fish market at Newhaven as a model for development in keeping with the

Not accepted. The finalised framework sets out the Council's principles and requirements in order to achieve long-term benefits for Leith, the city and the city-region as a whole.

The framework is intended to avoid such a piecemeal approach.

Noted. Reference to buildings over 16 storeys has been removed in the finalised framework. The general question of very tall buildings is part of a separate, city-wide process. The prevailing heights of

spirit of the area.

EGP questioned the need for building a further 18,000 dwellings in North Edinburgh on top of those proposed in Granton and elsewhere in the area.

EGP stated concern at the lack of true consultation that has gone into these plans, stating that the local community has been given little notice of these proposals and citing the short time period of the consultation process and the poor publicity of the LDDF.

EGP stated that there is little consideration of the impacts of the development on the wider North Edinburgh community, especially in terms of increased traffic.

EGP stated that it does not want the LDDF to be approved by the Council in its draft form and would wish to see it re-drafted with full public participation.

EGP stated while the plans to create public parks and open space are welcomed, the density and heights proposed suggest town-cramming, and suggested that a uniform building height no higher than the traditional height of Leith tenements should be applied to the whole area.

EGP stated that Leith Walk and other parts of Leith have capacity for new major non-food retailing and could be improved as a shopping destination and that therefore the framework's description of Ocean Terminal is incorrect. EGP stated that the framework's content does not suggest that development in its area will be more distinguished than

buildings in the majority of the LDDF area (5-8 storeys) reflect those in existing areas of Leith, with 3 storeys prescribed at the coastal edge. Providing a balanced mix of dwellings in Leith docks helps address a large part of the city-region's housing needs in an accessible, sustainable brownfield location.

Not accepted. The consultation process is described in detail in the main committee report.

Not accepted. The potential impacts, and opportunities, for the wider community are being considered appropriately, and cumulative transport impact issues have been considered to inform the finalisation of the framework. The Transport and Environmental Assessments of the outline application will address these issues in more detail before any consents are given.

Noted. The LDDF has been finalised in order to address consultation responses as appropriate. Public involvement is described in the main committee report.

Not accepted. The finalised framework requires an extensive amount and range of open space provision. Variation in building heights is sought across the LDDF area in order to respond to the different characters of the different docks and to ensure distinct neighbourhoods are created.

Noted. The framework has been clarified with regard to Ocean Terminal's role relative to town centres such as Leith Walk and Leith Central.

Noted. The framework is not a masterplan and it is at the masterplanning stage that the quality of buildings

recent building in the area.
EGP suggested that the percentage requirements for affordable housing be extended to require affordable premises for office, retail and other commercial activity.

EGP stated that provision of facilities for community events and activities should be required and made available at little or no cost to voluntary/community organisations.

EGP stated that space for water-based activities should be included in the development and bridges should not sever stretches of water.

EGP stated that the central parks and other open spaces should be planned, planted and built at the outset.

EGP stated that the energy and resource demands of future buildings should be minimised and on-site sustainable energy production included, and stated a number of potential ways these could be achieved.
EGP stated that no east-west road linkages should be created through the site, instead a traffic management system should be put in place to downgrade the entire east-west route across north Edinburgh and a variety of access roads to the site to disperse traffic.
EGP made several suggestions relating to street and cycleway design intended to emphasis pedestrian and cycle priority.

EGP suggested that a significant proportion of new residential developments should be deemed car-free.

EGP suggested that where an existing building is retained,

and the detail of the spaces between are created.
Noted. The Council does not have a development plan policy framework for affordable commercial premises, however by identifying a substantial amount land for such uses the framework ensures that a significant amount of such premises will be proved.

Accepted. Reference to the need for space for such facilities has been included in the finalised framework. The management, maintenance and charges for these facilities are not planning matters.
Noted. Reference to access for small leisure craft has been clarified. Several of the proposed new bridges are opening to allow access to all of the docks for craft of varying size.

Not accepted. The phasing of development, which will allow a gradual change in the employment role of the area, requires that certain spaces will come later in the overall programme.

Noted. Sustainability targets are set out in Annex A to the framework.

Not accepted. The proposed extension of Ocean Drive to the east is intended and needed to allow the Commercial St/Bernard St/Salamander St corridor to be downgraded in importance as a traffic route.

Noted. The framework, the forthcoming public realm strategy for its area and the Council's non-statutory guidelines regarding movement all reflect those priorities.

Noted. The framework states that parking provision will be comparable with city centre levels. The Council's criteria for car-free development apply here.
Not accepted. Some of the listed pumphouses to be

no building should be built taller than it within a 700m radius, and increases in height thereafter should be gradual.

EGP expressed concern at the long timescale for the construction of the area and made several suggestions regarding construction mitigation.

EGP emphasised the importance of informing the local and city-wide communities at every stage of development, suggested that a dedicated information outlet be set up and suggested that applications should be submitted for areas larger than individual sites.

EGP referred to lighting quality and stated that lighting should be designed so that it does not contribute to light pollution.

retained within the area are 1-storey high.

Noted. Mitigation of construction impacts will be specified in the Environmental Statement associated with the outline planning application for the area and subsequent planning conditions.

Partly accepted. The finalised framework sets out the future masterplanning and consultation process, and identifies a site for a docklands heritage and information centre.

Noted. Lighting standards and design are addressed by the city-wide streetscape manual and the public realm strategy.

Noted.

Noted.

Noted. The LDDF has been revised to address this issue.

Accepted.

Noted. Section 5 refers to such opportunities.

The Transport and Environmental Impact Assessments of the outline application will address this issue.

Edinburgh Sustainable Development Partnership

The ESDP stated that it does not object to the principle of the redevelopment of Leith docks for the purposes outlined in the draft LDDF and welcomes the aspiration to ensure a sustainable development. The ESDP stated the Council's commitment to developing a sustainable city.

The ESDP made the following suggestions/comments:

- Welcomed the provision of a greenspace network.
- Stated concerns regarding the potential impact on the Special Protection Areas.
- Para. 1.6 - Vision should include a note regarding the safeguarding of habitats
- SUDS should be incorporated into the road network and parking areas and the LDDF should identify opportunities for surface water drainage, integrated into the landscaping, to improve water quality in the impounded docks
- More detailed consideration of air quality issues relating to traffic associated with this development is needed.

- The need to rehabilitate contaminated land should be considered.
- Provision of open space should be phased to match residential development.
- Stated serious concerns over the visual effects of building heights and the relative locations of tall buildings, and recommends that further character and visual assessments are necessary.
- The framework should require provision of adequate facilities for the separation and recycling of waste, require that a suitable area of the site be identified for such facilities, indicate the nature of facilities to be provided in line with the Council's waste strategy.
- Supported principle of renewable energy, any such proposals will require assessment in relation to the nature conservation interests.
- Measures that would lead to modal shifts in transportation and reduction in commuting distance should be considered.

The Environmental Impact Assessment of the outline application will address this issue.

Noted. The phasing of development, which will allow a gradual change in the employment role of the area, requires that certain spaces will come later in the overall programme.

The Environmental Impact Assessment of the outline application will address this issue.

Noted. Sustainability targets are set out in Annex A to the framework.

Noted. Sustainability targets are set out in Annex A to the framework.

Noted. These are fundamental objectives of the strategy set out in the framework.

Edinburgh World Heritage Trust

EWHT welcomed the principle of a comprehensive mixed-use sustainable development, and cited the Holyrood North site as an exemplar of development planning.

EWHT stated that scoping and assessment of impacts on key views into and out of the World Heritage Site should take acknowledge that it is the composition of landmarks within the city centre, and how they relate to each other and form important points of reference in the skyline which is of prime importance.

EWHT requested that the Council take cognisance of the EWHS Management Plan Consultation Draft (September 2004) and that sea-borne views and those from the Lomond Hills in Fife are used as part of the assessment

Noted.

Noted.

Noted. The Environmental Impact Assessment of the outline application will address this issue.

process.

Fife Council

FC noted that the proposed relocation of port activities in part to Rosyth appeared to be consistent with Rosyth's national role and sought confirmation.

Noted.

FC indicated that it would be broadly supportive of proposals for a tall building provided it enhanced the skyline.

Noted.

FC requested clarification of the LDDF's implications for structure plan housing allocations.

The eventual capacity of the LDDF area will have implications for the next structure plan.

Forth Ports

FP requested that the framework be amended as follows:

- Changes to the illustrative layouts for Waterfront Plaza and Ocean Triangle to reflect current planning applications which FP has lodged.

Not accepted. The framework reflects the Council's preferences and requirements for this site, these are not necessarily embodied in the current applications. The indicative height range for Waterfront Plaza has been increased, however, to reflect the high accessibility of this site to public transport and the city centre.

- Changes to the illustrative layout for Britannia Quay to take better account of key views from the south and linkages within the site and beyond.

Forth Ports has subsequently decided to withdraw this request.

- Identification of the VA Tech building as an alternative location for the tram depot instead of Site 1.11, which should be designated for residential use.

The framework has been amended to move the alternative depot site., though Site 1.11 has been identified for Education/Mixed Use rather than residential.

- Removal of the term 'Energy Park' and all references to waste transfer facilities.

The term 'Energy Park' has been removed. Reference to the suitability in principle of land at Site 1.9 for a waste transfer station remains, as this use is acceptable in principle in an area designated for industrial uses and can make use of the strategic rail freight yard in this location.

- Identification of Britannia Quay as a suitable location in principle for a 'resort casino'.

Not accepted. Such a facility will require to undergo a sequential test. It is sufficient for the purposes of the framework to identify the suitability of the site for commercial leisure uses.

- Recognition in the framework that the mixed use development prospects for the area are not dependent upon implementation of the tram and that alternative public transport improvements could satisfactorily address the requirements for accessibility. Not accepted. The scale of development, the nature of historic transport links to the rest of the city and concern for air quality along the existing main transport routes in Leith mean that the scale of development proposed in the LDDF could not proceed without the major improvement in transport infrastructure that the tram will deliver.
- Recognition in the framework that the percentage of affordable housing should reflect the wider benefit of the development to the city and the implications arising from an imbalance of affordable housing already existing in north Edinburgh, as well as the extraordinary site preparation costs associated with the development. Not accepted. The adopted local plan policy makes no provision for such factors to be taken into account when considering exceptions to the required percentage.

Health & Safety Executive

No comment on the proposals for redevelopment of the area. Noted.

There are 3 sites subject to hazardous substances consent however HSE understands that Forth Ports will wish to work with the Council to address their impact. Noted.

Historic Scotland

HS acknowledged the positive contribution much of the proposed development could have on the important cultural heritage of the area. In particular, HS welcomed the proposed retention of listed buildings, scheduled monuments and Imperial Dock cranes. Noted.

HS made the following suggestions/comments:

- It is inappropriate to describe buildings of between 5-16 storeys as 'medium' in the context of Edinburgh. Heights in Figure 1.15 have been redefined so that 5-8 storeys are the prevailing heights.
- Questioned whether an 'identifiable landmark cluster' in Leith should be of such a scale that it competes with iconic views of Edinburgh Castle from the north, and requested a much fuller exploration of the impact of this cluster on these views. Noted. The finalised framework does not identify potential sites for buildings of over 16 storeys. The Environmental Impact Assessment of the outline application will include assessment of visual impact on key views.
- The impact of buildings below 16 storeys should be assessed before their principle is established. The framework has been amended accordingly.

- The creation of bridges over listed structures could have a detrimental effect on these designations, both directly and upon their setting. The framework should also recognise that the setting of some of the listed buildings is much wider than the area which immediately surrounds them.
 - Consideration should be given to whether forming bridges which prevent boats passing through may have a stifling impact on how the water is used.
 - The highest contemporary design aesthetics should be sought and in general bridges should align perpendicular to the water channels they cross.
 - The creation of underground parking to the south of the Scottish Executive could allow the reinstatement of shallow water as a security barrier (c.f. Scottish Parliament).
 - The proposed insertion of a building and footpath into Victoria Dock would have an adverse impact on the integrity of the site.
 - It would be preferable to retain and reuse the Edinburgh Dock swing bridge for the north-south road, but if a new bridge is necessary this should be done in conjunction with the retention and reuse of the existing bridge.
 - Proposals to extend development over and into the docks are likely to have an adverse impact on the integrity and setting of these listed structures.
 - Consideration should be given to re-establishing the original layout of Edinburgh Dock.
 - The Martello Tower is a very rare type of monument, currently in poor condition and consolidation works should be undertaken in the short-term.
 - A Conservation Plan for the listed buildings and scheduled monuments should be required.
- Noted. The creation of new bridges as identified in the framework is fundamental to the objective of integration between existing and new parts of Leith, however the framework seeks to protect the character and setting of designated structures, and will require any additions to be sensitively-designed. The arrangement of new bridges, opening bridges and reinstated channel between Imperial and Albert Docks are designed to avoid such an impact. Noted. Various factors, including pedestrian desire lines, will influence the alignment of new bridges.
- The framework has been amended accordingly.
- Noted. The framework has been amended accordingly.
- Noted. The framework has been amended accordingly.
- Noted. The framework has been amended to remove references to new buildings extending over and into docks subject to further detailed design work at the masterplanning stage.
- Noted.
- Noted.
- The framework has been amended accordingly.

Leith Action Group (representing an unidentified local Community Council, St. Mary's RC Primary School, Leith Primary School, Leith Links Residents' Association and others) (letter addressed to Forth Ports, copied to Council)

LAG stated its concern that the area neighbouring Seafield Sewage Treatment Works is identified as an industrial area including an 'Energy Park', and suggested that this area should not be entirely industrial but a mixed development including a residential element.

The term 'Energy Park' has been removed, however reference to the suitability in principle of land at Site 1.9 for a waste transfer station remains, as this use is acceptable in principle in an area designated for industrial uses and can make use of the strategic rail freight yard in this location. The principle of industrial and business use in the eastern industrial area is established in the current local plan, and the question of changing this designation will be addressed in the Edinburgh City Local Plan process with the benefit of a city-wide study of industrial and small business needs.

LAG stated that Leith Links should have open access to the coast, not cut off by industrial development.

The framework has been amended to include a strip of sports pitches which could potentially run from the Links to the coast.

LAG noted that Forth Ports had publicly declared that there would be no waste incinerator proposals on its land.

Noted.

Leith Ahead

LA supported the broad principles of the LDDF.

Noted.

LA stated that consultation with LA and the wider community, including young people, should continue on a regular basis.

Noted. The finalised framework requires future masterplans to be informed by consultation processes.

LA stated that the vision set out should be realised, which requires developers to contribute to on- and off-site infrastructure, facilities and services necessary.

Noted.

LA objected to the definitions of Medium and Tall buildings in the draft framework and stated that this issue should not be addressed until after the city-wide Tall Buildings Study is complete.

Noted. Heights in Figure 1.15 have been redefined so that 5-8 storeys are the prevailing heights.

LA emphasised the importance of linkages between old and new Leith and the role of streetscape along linking routes in achieving this.

Noted. A public realm strategy for the whole of central Leith, covering the boundary between old and new, will seek to ensure seamless integration.

LA stated that facilities should serve all sectors of the existing population, be accessible from both old and new areas and should not lead to closure of facilities in the

The framework establishes principles regarding the location of facilities which reflect these concerns.

	<p>existing area. LA identified a number of uses and facilities. LA stated support for the concept of a boulevard from Leith Links to the coastal path. LA stated that phasing should ensure that public uses are brought forward early in the development programme, or where this is not possible existing facilities should be upgraded to cope with the additional demand. LA made a number of detailed comments and suggestions regarding the text of the framework.</p>	<p>Noted. These have been referenced as appropriate. Part of such an open space strip has been identified within the LDDF area. Noted. Reference to the importance of phasing facilities appropriately has been made in the framework. These have been addressed as appropriate.</p>
Leith Links Community Council	<p>LLCC welcomed the reference to affordable housing and the new road to the east and stated a hope that development would not proceed in a similar manner to that west of Granton Harbour. LLCC stated a strong desire for its area not to have any more 'sewage' type works with resultant pollution (i.e. a waste transfer station).</p>	<p>Noted. Noted. See comments in response to Leith Action Group above.</p>
Leith Links Residents' Association	<p>LLRA objected in principle to the proposal for an Energy Park and stated that it does not support the concentration of waste and industry near an established residential community.</p>	<p>Noted. See comments in response to Leith Action Group above.</p>
Lothian and Borders Fire Brigade	<p>L&BFB did not comment on the proposals but requested that at the appropriate stage, when the new road network and development proposals have consent, they have access to electronic mapping information for the new proposals. This information could then be fed into their Risk Assessment Model in order to determine that there is optimum placing of resources to deal with emergencies.</p>	<p>Noted. The Fire Brigade is included on the list of Masterplan Consultation Groups to allow the opportunity for any new facilities required to be included at the more detailed masterplan stage.</p>
Lothian and Borders Police	<p>L&BP advised that 'Secure by Design' criteria be adopted for all new and refurbishment developments, and listed the relevant principles, including provision for public space CCTV.</p>	<p>The Council's existing guidelines establish general community safety principles. It is considered that it is premature to assume a need for CCTV before this area has been occupied for a significant period of</p>

Lothian Buses

LB stated that there will be a need for bus termini at both the north-west and north-east areas of the LDDF area, and that these will both require toilet facilities, as at Ocean Terminal at present.

LB stated that interim turning points for buses will be required through the phased development of the area, and in particular that the existing roundabout at Ocean Terminal would be essential for this in the medium term and would be advisable to retain in the long-term.

LB welcomed the contribution that Tram Line 1 will make but stated that there will be a need for bus services to be enhanced and that the maximum walking distance to a bus stop should be 400m.

LB stated that Bernard Street should continue to be used as a major bus route.

LB stated that Constitution St and Bath Road should be shown as bus routes.

time and crime levels assessed.

Noted.

Noted. The reconfiguration of the street outside Ocean Terminal to remove all roundabouts remains a long-term objective.

Noted.

Noted. The framework does not preclude such a route.

Accepted. The framework has been amended accordingly.

Lorne Community Council

LCC queried whether the density and building heights in the framework have been driven by a need to meet predicted increase in households, citing other sites with potential to accommodate some of this growth. LCC stated that the framework should look beyond the dock area and consider the impact of the development on Leith as a whole.

LCC defined a sustainable community as one that can provide a whole life experience, providing a range of housing and facilities that can meet or be adapted to meet residents' needs as these change over time and which does not oblige residents to move away to meet their needs.

LCC made the following suggestions/comments/queries:

- How can the aspirational target of 30% family housing be achieved and is this sufficient in the context of

The density proposed in the draft framework was determined through an strategic urban design process as being appropriate for the site and its character. The density identified in the final framework is determined taking into account additional needs and constraints (e.g. school sites, open space and environmental constraints).

Noted. The need for dwellings, facilities and spaces to provide such a whole life experience has been emphasised in the framework.

Though the proportion of 30% may not be achievable due to market forces, the Council will require a

- housing developments over the wider Leith?
- There is a need for more older people's and sheltered housing in North Edinburgh, such groups should be consulted on their needs for housing and community provision, and a degree of separation between family and older people's housing is needed.
 - Increasing buy-to-lets/HMOs in Lorne is resulting in lifestyle conflict with owner-occupiers, therefore there is a need for purpose-built managed accommodation for student/young workers.
 - Affordable housing elements should be provided on-site with the associated main development.
 - Existing community, leisure and cultural facilities should be sustained and enhanced for the benefit of both existing and new residents, and provision in the new Leith should not put at risk the sustainability of existing facilities.
 - Recreational provision should be considered in relation to national guidelines for public sports pitches.
 - Further retail development must be considered in relation to its impact on Great Junction Street/Leith Walk/Kirkgate.
 - LCC is concerned that the northern peninsula will be remote from the tram.
 - A spread of employment opportunities should be facilitated, not just office and retail.
 - The Council's allotment strategy should be considered in relation to the LDDF.
 - LCC is concerned that developers may be discouraged from building family housing if they then have to fund the construction of a school.
 - LCC asked whether it is intended to provide a new
- significant proportion of family housing to be built. Noted. The need for dwellings to accommodate a range of household types including older people has been emphasised in the framework. Planning policy seeks a balanced integration of different housing and household types. Noted.
- This is a principle of the Council's Affordable Housing Policy. Noted. The framework has been amended to make reference to this concern and to state the need to consider the provision of such uses in relation to the total provision in Leith.
- Noted. The Council has identified sports pitch needs and the framework amended accordingly. Accepted. This is a requirement of existing planning policy. The framework has been amended to clarify the nature and location of local services, and of the scale of new retail facilities. Noted. Bus services will provide public transport to the peninsula, and new bridge proposals will improve the pedestrian walking distances between the peninsula and tram stops. The framework makes provision for such a range.
- Noted.
- The Council requires a significant proportion of family housing to be built and for the necessary infrastructure, including schools, to be provided. Noted. The need for a new police station in Leith has

police station in Leith to cover the increase in population, and welcomed Forth Ports' willingness to fund additional CCTV cameras in Leith outwith their ownership.

not yet been identified, however the Council and L&B Police are in dialogue regarding the implications of the LDDF proposals, and reference to the location of any new facilities has been made in the framework.

Mappin Planning & Development (on behalf of **Wm Morrison Supermarkets plc**)

Wm Morrison made the following comments:

- The LDDF should contain a definition of 'local centre facilities' and include details of the scale of any retail facilities.
- It should be made clear within the LDDF that any requirement for 'local centre facilities' will be considered as part of the ECLP review.
- The retail policies and proposals within the ECLP should ultimately inform the retail content of the LDDF.
- Any proposals for retail development within the LDDF study area should be assessed against relevant development plan policy.

Noted. The framework has been amended to clarify the nature and location of local services, and of the scale of new retail facilities.

Noted. It is appropriate to make provision for limited new local shopping facilities in an area of planned housing growth ahead of the ECLP.

Noted.

Noted and agreed.

National Playing Fields Association

No comment.

Network Rail

NR objected to the LDDF proposals as they effectively reduce the available area for rail freight facilities. NR stated that it recognises that there is scope for some rationalisation and the release of brownfield land for alternative uses.

NR commented that the proposal for a linear park/promenade in Site 1.9 appears incompatible with the proposed waste management use.

NR queried the residual rail line to Imperial Dock.

NR stated that any increase in traffic over level crossings would have to be the subject of a risk assessment, and any required upgrade would have to be developer-funded.

Noted. The change in the role of the port way from freight handling reduces the need for these facilities.
Noted.

An attractive coastal path use is not incompatible with adjacent industrial/waste management uses.

The framework has been amended accordingly.
Noted.

Newhaven Community Council

NCC supported the principle of redeveloping Leith docks. NCC raised concerns over the following issues:

- The architectural standards of development, citing recent developments as poor and seeking new ways to improve standards.
- Transport impact, on the existing road network and on the proposed tram services.
- The amount of employment space, particularly offices, which would reduce the need for new residents to travel to the west of the city to work, resulting in a more sustainable development.

Noted.

The Council will continue to seek high standards of design quality as detailed proposals come forward.

The Transport Assessment of the outline application will address these issues.

The framework includes a significant amount of office and other employment space, creating conditions for more sustainable travel patterns.

NHS Lothian

NHS stated that there would be insufficient capacity in surrounding GP practices to accommodate the growth in population envisaged in the draft framework. NHS noted that the likely health requirements would depend upon the extent to which population is displaced from existing residential areas, and the age mix of the population in the framework area.

NHS confirmed that the draft framework's ratio of one medical practice per 6-8,000 people was appropriate, stated that such a centre would require around 1000 sq.m. floorspace and stated that it would be appropriate to seek developer contributions towards the cost of these essential community resources.

Noted.

Noted. The framework now includes this approximate floorspace figure.

Royal Fine Art Commission for Scotland

RFACS stated that it continues to support the need for a development framework to set the context for the redevelopment of the docks.

RFACS stated that it does not appear logical for the ferry and cruise liner terminal to be located at the end of the eastern breakwater where it would be least accessible to public transport, including the tram.

RFACS suggested that consideration should be given to

Noted.

The sealing dam and lock gates at the entrance to the docks restrict the potential location of these facilities to outwith the current docks. An alternative potential location for a cross-Forth ferry terminal has been identified separately at Newhaven.

Noted. The shape and size of the central park is

more strategic open space reflecting the long narrow shape of the main docks.

RFACS referred to the Holford Study regarding tall buildings and stated that the outcome of the new city-wide high buildings study should be known before the framework is finalised.

RFACS stated that more careful consideration needs to be given to the future use of the docks themselves.

RFACS referred to the preparation process of the Edinburgh City Local Plan, and stated that the supplementary planning guidance should be developed and informed by the development plan review process, and it would therefore be premature to approve the framework prior to the adoption of the local plan.

RFACS referred to the public consultation exercise that surrounded the Council's commissioning of the Llewelyn-Davies' masterplan for Granton and stated that the public consultation and independent scrutiny of the Leith Docks proposals should be no less thorough and open.

Royal Society for the Protection of Birds

RSPB accepted the principle of the proposed redevelopment of Leith docks.

RSPB stated serious concerns regarding the potential impact of some aspects of the proposals on the Firth of Forth Special Protection Area (SPA) and the Imperial Dock Lock SPA and therefore objected to the adoption of the LDDF as SPG until the necessary environmental

similar to that of Edinburgh and Albert Docks.

Not accepted. The framework does not establish the principle of very tall buildings in the docks and makes clear the role of the new city-wide study in considering proposals for tall buildings, and therefore can be approved in finalised form prior to conclusion of that study.

The framework has been amended to clarify the need to accommodate small-leisure craft and assess and if necessary improve water quality in the docks to recreational standard.

Not accepted. National planning policy states that supplementary planning guidance can be prepared for areas of change and in a more detail than is appropriate for a development plan. The preparation of this framework has been briefed and managed by the Council's local plan team, and relevant elements will be incorporated into the new local plan with the benefit of a more detailed consultation process than would have been appropriate for the local plan.

Noted. The extensive consultation process on the draft framework has informed its finalisation. The framework makes clear that the preparation of future masterplans must also be informed by further public involvement, reflecting the nature of public involvement as an on-going process rather than a one-off event.

Noted.

The framework has been amended significantly to address these concerns. Building heights on the north-west end of Edinburgh Harbour are now subject to further study of their likely impact on the Imperial Dock Lock SPA, the footbridge here has been

assessments have been carried out and it has been demonstrated that the proposals will not be detrimental to the integrity of either of these SPAs. RSPB stated concerns relating to the environmental impact assessment methodology and the level of detail to be provided in the outline application.

RSPB objected to the indicative location of the cruise liner terminal landfall and open space in the vicinity, and requested that the relevant figure be changed.

moved, and details at the coastal edge have been changed to partly address RSPB's concerns.

Further discussion and survey data has addressed this concern and RSPB has subsequently stated that an EIA of an outline application is appropriate provided that application is sufficiently detailed. The framework has been amended to show greater flexibility regarding the open space and the cruise liner terminal position and to state the requirement for detailed and appropriate assessment of the landfall of the terminal. RSPB continues to object to the principle of the terminal in this location.

John G Russell (transport) Ltd.

JR was supportive of the general aims and objectives of the LDDF.

JR requested that his site (Site 1.11 and Site 1.10 (part)) be identified for residential use rather than industrial, citing the following reasons:

- local residents and the local councillor prefer that the site be zoned for residential use;
- tram depot Option 2 would be better located in the VA Tech building;
- rail access to JR's site will be severed by the new access road as proposed, thus constraining the site's industrial potential;
- residential use would result in a more logical land use pattern and would be more compatible with the existing adjacent tenement building.
- adequate industrial land supply would be provided by other sites to the east, north and south.

Noted.

Not accepted. Site 1.11 has been identified as well-placed for a school to serve both existing and new communities in a similar way to Site 1.12, which may be unavailable to do so (Tram Depot Option 1). Accordingly, it has been identified as Education/Mixed Use in the finalised framework. Part of Site 1.10 has been identified as land needed to provide for the sports pitch needs of the development area.

Scottish Enterprise Edinburgh & Lothian

SEEL welcomed the approach to the LDDF area, confirmed comments made in July 2004 and made the following comments:

Noted.

- the framework identifies a balanced range of land uses;
- the proposed routes provide a good transport strategy;
- the identification of a range of open spaces is sustainable and discussions on delivery of these should take place at an early stage;
- the first phase of development could potentially include projects which could be brought forward earlier.

Scottish Environmental Protection Agency

SEPA referred to earlier correspondence which addressed drainage, flood risk, contaminated land, air quality, ecology and construction works.
SEPA made additional suggestions regarding sustainability criteria, waste minimisation, air quality, sewage capacity and provision of land for civic uses and open space.

The Environmental Impact Assessment of the outline application will address these issues.

Noted.

Scottish Natural Heritage

SNH did not object to the general principle of the proposed redevelopment of Leith docks.
SNH stated serious concerns regarding the potential impact of some aspects of the proposals on the Firth of Forth Special Protection Area (SPA) and the Imperial Dock Lock SPA and therefore objected to the adoption of the LDDF as SPG until the necessary environmental assessments have been carried out and it has been demonstrated that the proposals will not be detrimental to the integrity of either of these SPAs.
SNH objected to the adoption of the LDDF as SPG until appropriate landscape/townscape character assessments and visual impact assessments have been conducted.
SNH made the following additional comments:

- The Vision should include safeguarding the designated habitats.
- The Background and Planning Policy sections require some revisions.
- The capacity of existing open space to accommodate new users is limited therefore new open space

Noted.

The framework has been amended significantly to address these concerns. Building heights on the north-west end of Edinburgh Harbour are now subject to further study of their likely impact on the Imperial Dock Lock SPA, the footbridge here has been moved, and details at the coastal edge have been changed to address SNH's concerns. SNH has now withdrawn its objection.
The Environmental Impact Assessment of the outline application will address this issue.

The framework has been amended to include such a reference.
The framework has been amended accordingly.

Open space provision is being considered in the context of the whole of Leith, therefore enhancement

	<p>development should be phased to match residential development.</p> <ul style="list-style-type: none"> • Renewable energy proposals are supported in principle but would require assessment in relation to nature conservation interests. • Proposals for a fully integrated network of paths and public transport are welcomed. 	<p>of existing spaces to provide for early phase developments is appropriate. Playing field provision has been addressed in more detail in the framework.</p> <p>Noted.</p> <p>Noted.</p>
Scottish Rights of Way Society	<p>The National Catalogue of Rights of Way does not show any rights of way in the area of development. The proposed cycle and pedestrian routes will provide ample access across the area and link to other recognised routes outwith the area.</p>	<p>Noted.</p>
Scottish Water	<p>SW stated that it is generally supportive of the framework, stated that any changes to access to Seafeld Wastewater Treatment Works would require to be discussed with SW, and stated that careful consideration of the odour complaint history of Seafeld Wastewater Treatment Works should take place before permitting new development in the immediate vicinity of the works.</p> <p>SW suggested several edits regarding technical water and drainage issues.</p>	<p>Noted.</p> <p>Noted. The framework has been amended accordingly.</p>
Sport Scotland	<p>SS noted that development of up to 18,000 new houses will generate significant demand for facilities for sport and recreation and recommended that needs are established through strategic assessment taking account of supply and demand of facilities in the wider area. SS noted that this approach would contribute to the aim of achieving functional integration between existing and new residential areas in Leith.</p> <p>SS stated that on-site provision of a dry sports centre providing facilities such as a sports hall, dance studio and fitness studio would be warranted and such facilities would</p>	<p>Noted. An overview of open space in Leith is to be addressed by the Leith Ahead initiative.</p> <p>Noted. Reference to a dry sports centre has been made in the framework.</p>

be best provided on a community school campus.
SS stated that if the Sports Pitches strategy identifies a deficiency that cannot be addressed by upgrading existing playing fields new land should be reserved for this purpose in the LDDF.

The framework has been amended to include a pitch centre.

SS stated that an open and transparent mechanism should be established for securing developer contributions to community facilities, both on- and off-site.

Noted.

Transport Initiatives Edinburgh

TIE welcomed the recognition that the tram network will provide the necessary step change in transport infrastructure to ensure sustainable development of the LDDF area.

Noted.

TIE stated that it is inappropriate to consider an alternative tram depot location to the Constitution St site identified in the Private Bill for Tram Line 1, and that therefore the development scenario based on the alternative depot location should be deleted from the LDDF.

Not accepted. Option 1 for the depot will result in visual, physical and functional severance between the existing and new areas of Leith. It is appropriate to identify alternative solutions.

The following parties were also sent consultation drafts but did not provide written responses:

Port of Leith Housing Association

Cala Homes (East) Ltd.

Scottish Coastal Forum

Leith – Harbour CC

Leith – Bonnington CC

Cockburn Association

Craighentinny CC

Trinity CC

Civil Aviation Authority

National Museums of Scotland

Architectural Heritage Society of Scotland

Edinburgh Chamber of Commerce

Crown Estates

Bell & Scott Solicitors

Dundas & Wilson

First Edinburgh

Jones Lang LaSalle

Forth Estuary Forum

Scottish Wildlife Trust

Water of Leith Conservation Trust

Waterfront Edinburgh Ltd.

Edinburgh Architectural Association

SPOKES

Second Site Properties

EDI Group

Communities Scotland

J Smart & Co

The relevant local councillors had all been provided with copies prior to committee approval in September.

The following parties were notified of the consultation process but did not respond:

West Lothian Council

MSP for Edinburgh Pentlands

MP for Edinburgh Pentlands

Scottish Borders Council

MSP for Edinburgh West

MP for Edinburgh Central

Midlothian Council

MSP for Edinburgh South

MP for Edinburgh West

Falkirk Council

MSP for Edinburgh Central

MP for Edinburgh South

List MSPs for Lothian (except Greens, who did respond).