

Leith Docks Development Framework– Internal Responses to draft development framework

APPENDIX 4

Note: input from within the City Development Department, such as from Transport, is integral to the framework preparation process and has not been recorded here.

FUNCTION/DEPT.	COMMENT	RESPONSE/NOTES
Environmental & Consumer Services	The method of assessing air quality in the Environmental Impact Assessment of the forthcoming outline application has been agreed with the environmental consultants.	Noted.
	ECS stated serious concerns regarding the impact on air quality that this scale of development is likely to have, due to early indications that traffic on the surrounding will be significantly affected. Gridlock on parts of the network is predicted.	Noted.
	ECS stated that its opinion is that the LDDF proposals are likely to have a significant adverse impact on air quality in surrounding areas, with the prospect of creating further Air Quality Management Areas in Leith. The LDDF proposals are also anticipated to have a deleterious impact on the existing AQMA in the city centre. It is not clear at this stage what mitigation options are available nor the extent to which they might counter the effects of the projected additional traffic loading.	Noted. The framework has been amended to make clear that the mitigation proposals in the environmental statement and transport assessment will need to complement and reinforce one another. These measures will need to be significant, will be essential if planning consent is to be delivered.
	Consequently, ECS strongly cautions against a level of development at Leith Docks which is likely to lead to the creation of new Air Quality Management Areas or to the further degradation of existing ones.	Noted. The framework identifies the emerging air quality issue as one which must be addressed by the transport measures identified by the transport assessment, and identifies the tram and low/no emission bus vehicles as part of those measures.
	ECS described the statutory notice process currently underway addressing the odour nuisance from Seaford Sewage Treatment Works, and noted that careful consideration needs to be given to the establishment of odour-sensitive uses in the LDDF area.	Noted
	ECS stated that sensitive and appropriate phasing will be critical to address noise issues and stated the necessary assessment methodology.	Noted.
ECS referred to necessary assessment methodology regarding ground	Noted.	

contamination.

ECS stated that the dock water quality related to the low turnover of water in the dock basins and the composition of mud-sediment forming the basin, and listed the toxic substances and biological samples which should be taken as part of the necessary assessment.

ECS stated that consultation with SEPA suggests that the potential future use of impounded waters within the docks for leisure/recreational purposes could lead to their classification as 'Recreational Waters' in terms of the Water Framework Directive. Such classification will require the water quality to be established to, and maintained at, the appropriate statutory standards.

ECS identified the opportunity to implement good practice in waste storage and management in new development.

Noted. The Framework has been amended accordingly.

The sustainability targets address these issues.

Housing

Housing stated that the 4,500 affordable houses which application of the 25% affordable housing requirement would deliver would contribute almost half of Edinburgh's currently identified affordable housing needs. Housing stated that it is currently updating the Council's Housing Needs Assessment and the results will be available by mid-2005.

Noted.

Housing welcomed the requirement that the developer will be expected to provide full and verifiable financial details of any extraordinary site preparation costs cited as justification for reducing the level of affordable housing, and requested that this information be made available at an early stage.

Noted.

Housing stated for the avoidance of doubt that costs associated with the preparation of the LDDF, e.g. those relating to site investigation, environmental appraisal and the masterplanning exercise itself are not considered to be extraordinary site preparation costs.

Noted.

Housing supported the commitment to providing a range of housing types, recommended that, in the interests of achieving better integration between affordable and market housing, no more than 50 affordable units be located in the same place and advised that 70% of the affordable units be provided as social rent. In the event that this tenure mix changes following the updating of the Housing Needs Assessment, Housing will advise Forth Ports as quickly as possible.

Noted. Some of these points are reiterations of the current affordable housing policy as set out in the current local plan.

Housing stated concern regarding the definition of 5-16 storeys as 'Medium'.

Housing stated that the tram depot option which locates the depot between Constitution St and Bath Rd is a lost opportunity to create valuable social and cultural linkages between the heart of 'old' Leith and the 'new' development area, and it would be more desirable to locate the tram depot on site 1.11.

Housing responded to the Committee's additional question (d) by stating that the well-being of existing communities in Newhaven and Leith may be enhanced by ensuring that people living there have access to new affordable housing in the waterfront, thus allowing the existing communities to view the development as offering options to improve their quality of life and not simply as a dormitory for 'new residents' moving in.

Housing responded to the Committee's additional question (f) by stating that it has been in discussion with City Development and others with regard to the need to develop an investment plan by the Council and other service providers across the waterfront, a process which could be considered as part of the wider community planning process.

The framework has been amended to address this issue.

Reference to an alternative depot location in the VA Tech building is made in the finalised framework. Site 1.11 is identified as a suitable alternative location for uses to be accessed by both 'old' and 'new' Leith in the event that Site 1.12 is occupied by the tram depot.
Noted.

Noted. This will be a key aspect of the implementation of the framework's strategy.

Education

Education carried out a new survey of different types of development in Edinburgh and the pupil product from each of these developments, and thereby revised its general child-to-house ratios used to assess education infrastructure requirements on planning applications. These ratios were applied to the assumptions in the draft LDDF, i.e.:

- 18,000 dwellings on FP land
- 30% of this to be 'family housing'
- 25% of both 'family' and 'general' housing to be affordable

The number of secondary pupils was assumed to be 5/7 of that for primary-aged pupils, and 12.5% of total pupils were assumed to attend a denominational school.

The ratios and assumptions generated estimates as follows:

1640 non-denominational primary pupils

Noted.

Noted.

1170 non-denominational secondary pupils

230 denominational primary pupils

170 denominational secondary pupils

Assuming a notional capacity of 415 pupils for a double-stream primary school would mean 4 such ND primary schools would be required. Education will report on investigation into existing capacity in early 2005, and infrastructure requirements would be adjusted accordingly.

National regulations require a 1.2ha site for each double-stream primary school.

There is no spare capacity in existing nearby secondary schools therefore a new secondary school will be required. This will require a site of at least 1.7ha assuming nearby playing fields are available for use (c.f. Boroughmuir feasibility study for a 4-storey design). If nearby playing fields are not available for use by the school, the minimum secondary school requirement would be 5.34ha.

A single-stream denominational primary school is required (0.91ha site), which could be sited with a denominational school on a shared campus.

Secondary denominational capacity can be provided through an extension to Holy Rood High School.

Potential requirements are described in text and locationally critical schools are identified in diagrams.

Referred to in text, with reference to potential for exceptions. Potential requirements described in text and locationally critical schools identified in diagrams. Playing pitch provision will be off-site but nearby (see Culture & Leisure response below)

Potential requirements described in text.

Potential requirements described in text.

Potential requirements described in text as appropriate.

Culture & Leisure

C&L provided a general response which stated:

- there may be opportunities to provide new and perhaps larger facilities within and around the development area;
- the references to Cultural and Leisure uses in para 6.9 of the draft seem to be 'add-ons' rather than substantial mainstream facilities such as a library and leisure centre;
- the Cultural Centre identified in the framework could lend itself to the creation of a multi-purpose venue or site combining leisure, sports, library and arts uses.
- The residential densities envisaged indicate that there will be demand for allotments or communal gardens and existing provision is already overstretched in this area (c.f. new models in Craigmillar)

- C&L Department has been seeking to progress the idea of a Museum of Leith for some time – one of the listed buildings in the LDDF area could serve as a location for this;
- In order to integrate public art into development, artists should be brought into the design process at an early stage.

C&L provided a further response focused on sports pitch provision, based upon the level of existing demand and the Council's Sports Pitches Strategy. This response identified the sports pitch requirements arising from 18,000 new dwellings. These equate to a quality pitch sports venue consisting of:

- 1 semi-final/final pitch (100x70m = 0.7ha)
- at least 3 other A or B quality supporting pitches (90x60m = 0.54ha each)
- at least two 7-a-side pitches (60x45m = 0.27ha each)
- at least one floodlit synthetic grass full-size pitch (100x70 = 0.7ha) with an extra area for 5 or 7-a-side play (e.g. 50x35ha = 0.175ha)
- Grade I changing facilities
- 'Field Turf' synthetic surfaces where appropriate
- facilities fully open to public use
- social facilities

The land requirement for such a facility is likely to be around 4 ha in area.

A pitch strip which could accommodate these or similar facilities has been identified in the framework in a form similar to that proposed in the Leith Urban Design Framework, adjacent and parallel with Albert Road as indicated in the LUDF. The width of this strip would be determined by consideration of pitch layout. The pitch strip would be divided by the eastern road link, but that is acceptable. Extension of this strip to the south of Salamander St, and the associated land use implications will be considered in the ECLP. In order to contribute to the formal visual effect proposed in the LUDF, the east and west edges of the strip should be lined by a single formal row of trees.

Youth Services Advisory Committee

The YSAC stated that if the new community is to be mixed balanced and inclusive, young people need to be involved in planning at each stage of development, especially on issues relating to:

- the use of public space;
- the role and character of new centres
- cultural and leisure facilities
- housing
- educational facilities
- transport infrastructure

Noted. The YSAC is included in a list of groups to be consulted on the preparation of future masterplans within the framework area.

The YSAC stated that new development should be designed in such a way as to be integrated with other parts of existing Leith, and planners and developers need to take cognisance of the importance of new community and leisure provision being accessible from beyond the new development and young people's needs being designed into the scheme.

See above.

The YSAC recommended that further consultation with young people be co-ordinated with organisations such as Edinburgh Youth Council and Edinburgh Young Scot/Dialogue Youth.

See above.