

Local Place Plan
for
The field known as Midmar Paddock, Midmar Drive,
Edinburgh



Photo: Midmar Paddock from Blackford Hill

Playing its part in a green vision for Edinburgh

Produced by the Friends of Midmar Paddock in consultation with the local community and submitted to Edinburgh Council by Save Midmar Paddock on behalf of the Friends.

February 2025

Midmar Paddock is a privately owned greenspace located east of the junction of Midmar Drive with Hermitage Drive, Edinburgh. It is bounded by these two streets on the west side, by Midmar Allotments to the north and by the Hermitage of Braid and Blackford Hill Local Nature Reserve to the east and south. Midmar Paddock is much used by the general public both for enjoyment of the space itself, plus it gives access to other popular locations as noted in the plan below:



Diagrammatic map showing six Rights of Way, specifically 2-5, 2-3, 4-5, 1-5, 2-6 and 2-4. Route 2-5 is also designated a Core Path.

A Location Plan is provided in Appendix 1.

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1) Introduction

Who we are:

Friends of Midmar Paddock (FMP) were formed at a public meeting in September 2018. The primary purpose of the organisation is the following:

To preserve Midmar Paddock as unbuilt on publicly accessible open space

The group is currently administered by nine Trustees and holds a mailing list of some 1,200 supporters.

The group is viewed on Facebook (3,400 followers).

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This Local Place Plan is submitted by the community body Save Midmar Paddock on behalf of Friends of Midmar Paddock. The Save Midmar Paddock Constitution accompanies this Local Place Plan under separate cover.

2) Aims of the Plan

This Local Place Plan aims to set out the current use of the Paddock and demonstrate why FMP believe that Midmar Paddock should be protected from development and preserved as unbuilt on publicly accessible Open Space, all in accordance with its current planning protections and designations.

This Local Place Plan aligns with existing planning policies and proposes no alteration to the current Local Development Plan, City Plan 2030. **This Local Place Plan proposes that the current designations (see section 3, Current planning context, below) be carried over into the next Local Development Plan, namely City Plan 2040.** The city council is requested to consider this Local Place Plan in the preparation of City Plan 2040.

No alteration to NPF4 is proposed.

This Local Place Plan has been prepared having regard to the South-East Edinburgh Locality Improvement Plan incorporated into the “Edinburgh Partnership Community Plan 2022 – 2028”, as it contributes positively towards Priority 3 - A good place to live.

3) Current planning context

The current **Local Development Plan “City Plan 2030”** was approved by the city council on 7th November 2024. Within the plan, Midmar Paddock is designated as Open Space, Green Belt, a Special Landscape Area and a Local Nature Conservation Site. These designations have been carried over from previous Local Development Plans.

There have been no planning applications on the site in terms of current records. There are no applications pending at the time of preparing this document.

It is worth noting what **National Planning Framework 4** (adopted 13 February 2023) says about our “Natural places”:-

“Policy Intent:

To protect, restore and enhance natural assets making best use of nature-based solutions.

Policy Outcomes:

- Natural places are protected and restored.
- Natural assets are managed in a sustainable way that maintains and grows their essential benefits and services.”

Circa 2005, a **Core Path** across Midmar Paddock was declared under the Land Reform (Scotland) Act 2003

4) The Community's Use of Midmar Paddock

The Paddock is privately owned land which has been in one ownership during the period 1923 to 2024. Despite this, Midmar Paddock has been adopted by Edinburgh people as a place where they can enjoy a wide open space for dog walking and exercising, personal exercise by walking and running, and botanical study.

A count of users undertaken in pre-Covid October 2018, for the FMP, suggested that visitors numbered around 500 on a weekday and around 1,000 a day on weekend days. Numbers greatly increased during Covid as people could not travel far for exercise.

Data collected during the preparation of the case for Rights of Way in the Paddock in December 2018/January 2019 indicated that visitors came from all parts of Edinburgh, not just within the immediate surroundings. This is evidenced in part by the pressure on the small public car park which serves the site. The parking overflows along both Hermitage Drive and Midmar Drive.

The Rights of Way survey data covered 750 users. Analysis of that data showed what brought visitors to the Paddock:

Recurring Themes mentioned in Comments	Number of comments received	% of forms with comments
Running. Walking. Exercise	439	65.5%
Green / Open Space	388	57.9%
Views. Scenery. Nature. Fresh Air. Wildlife	314	46.9%
Mental Health	290	43.3%
Physical Health. Fitness	234	34.9%
Social. Community	188	28.1%
Access to Local Nature Reserve	165	24.6%
Dog Walking	137	20.4%

The claimed benefits to mental health and personal wellbeing were a recurring theme amongst users:

Q1. Do you think you get health and well-being benefits from the Midmar Paddock Green space?	99.6%
Q3. Do you think building development on the green space at the Paddock would have an impact on your health and well-being?	96.3%
Q4. Do you think any proposed building development on the Paddock would affect you personally?	94.8%

In January 2022, the city council's Access Forum agreed to assert six Rights of Way criss-crossing Midmar Paddock and this was later ratified by the council's legal officer.

5) Heritage of the site

Midmar Paddock has been used for agriculture since medieval times evidenced by the rig and furrow pattern still visible in the landscape and recorded in an illustration in the Canmore archive reference Canmore Id : 293232. See this link:

<https://canmore.org.uk/site/293232/edinburgh-blackford-hill#site-images>

There are no WWII records of cultivation which would have disrupted the above.

In more recent years, the site has been leased for periods (circa year 2000) of grazing by cattle, but this use ceased some fifteen years ago. An earlier period of grazing by sheep has also been recorded.

There are two tree roundels in the Paddock, the west one of which may have been the site of an early house or castle, later replaced by Hermitage House (1783-85). No excavation of these area is understood to have taken place. Tree Preservation Orders apply to these tree roundels (more on this in Appendix 2).

A survey of users undertaken by the Friends of Midmar Paddock has indicated that the field has been open to public access and use for a period in excess of 75 years.

6) Biodiversity of the site

Various biodiversity studies have confirmed that Midmar Paddock has a rich biodiversity. 129 plants, 21 insects and 15 fungi have been recorded, well justifying its Local Biodiversity Site status.

A Midmar Paddock Preliminary Ecological Appraisal Report was commissioned by FMP in May 2022. The Report's Conclusion and Recommendations are attached as Appendix 3.

Whilst Midmar Paddock is a relatively small site in biodiversity terms, it already contributes positively to ecological connectivity. It could reasonably be added to the list of Edinburgh Nature Network sites as, with its 129 plant varieties, it makes a positive contribution to the Edinburgh Living Landscape vision of making Edinburgh one of the most sustainable cities in Europe by 2050.

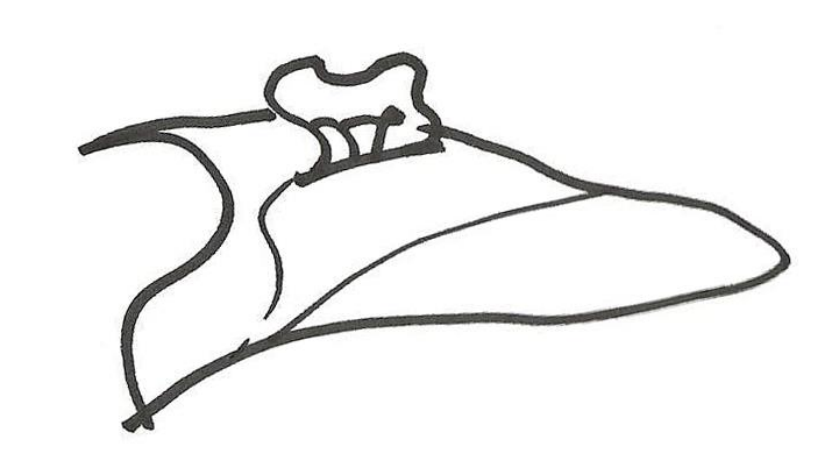
Midmar Paddock is bounded on the east and south by the Hermitage of Braid and Blackford Hill Local Nature Reserve and acts as a buffer zone to the Reserve thereby contributing to its ecology and biodiversity.

7) Statement on Consultations

To follow

8) Conclusion

This Local Place Plan shows that there is overwhelming public support and community health and wellbeing benefits, as well as benefits to nature, in continuing the current planning protections and designations of Midmar Paddock and keeping Midmar Paddock as unbuilt on publicly accessible open space.



Appendix 1

Location Plan of Midmar Paddock

Midmar Paddock is bounded by Hermitage Drive, Midmar Drive, The Hermitage of Braid and Blackford Hill Local Nature Reserve, and to the north by Midmar Allotments.

Midmar Paddock is shown in light green and bordered in a thick black line.



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Appendix 2

Planning History

Site History: The history of this site held on file by the City Council goes back to 1965 and includes the following:

6 July 1965: submission of an application to develop 18.25 acres for residential purposes (including the adjoining allotment area); withdrawn on 25 August 1965.

November 1965: an application to develop 10.37 acres for a private school and sports ground; the decision letter of 8 December 1965 advised that this was acceptable in principle.

December 1965: application 1379165 for change of use of 18.625 acres (the Midmar Drive site plus adjoining allotments) for low density residential development (in principle) This was considered by Planning Sub-committee on 22 December 1965 but despite considerable negotiation, no formal decision appears to have been issued.

November 1966: application 1320/66 for the erection of 31 houses etc on the same site as above submitted. Full Planning Committee on 2 February 1967 endorsed the Planning Sub-Committee decision to refuse the application for the reason that “the proposals would be contrary to the principle, and would detract from, the amenity of the Green Belt”.

6 December 1966: The Report to Planning Committee indicated that the Quinquennial Review of the 1957 City and Royal Burgh of Edinburgh Development Plan sought to designate this area as Private Amenity Open Space, allotments, Green Belt and as an area of Special Landscape Value.

August 1967: an application for outline permission for one house immediately east of 26 Hermitage Drive submitted was refused by Planning Committee later that month, on Green Belt principles.

December 1982: application 2405482 for permission in principle to erect 28 houses: the applicants were the site Trustees and Cala Homes Ltd. This application was refused by Planning Committee in June 1983 for the reasons that it would be contrary to Structure Plan policy for the Green Belt, contrary to Development Plan zoning as private open space and would adversely affect the visual appearance of this site in an area of landscape value.

24 July 2003: the City of Edinburgh **Tree Preservation Order No.3.2003** was made to take effect on the 25 of July 2003 and in terms of Section 163 (2) of the Act would remain in effect until confirmed. Confirmation would have to be within six months of the placing of the order, i.e. by the 24 of January 2004. This order applies to the two tree roundels or copses.

The Order was made for the reason that that the trees provide considerable visual amenity to the west of Blackford Hill and make a significant contribution to the character and landscape quality of the locality. The trees range between young mature, mature and over mature. The trees are not natural regeneration but have been planted to a design in the two copses. The condition of the trees ranges from poor to good, which is all that can be expected given the lack of proactive management. It is not the individual tree that contributes to the amenity and character of the area, but the two copses, as a whole, so individual components are not as important. The two copses provide transitional islands for local wildlife migrating from the urban areas to Blackford Hill. The heights of the trees go up to a maximum of 18 metres. Given the

orientation of the site, the height and mass of the copses are visually important to their surroundings.

February 1987: applications 413/87 and 414/87 for the erection of one house adjacent to No. 26 Hermitage Drive. The application offered a number of elements of “planning gain” in respect of adjacent land (including sale of the allotments to CEDC, securing the future and public access to the rest of the area - “the Paddock”). Planning Sub-committee in September 1987 was minded to grant conditional consent to the first application but no decision was formally issued. The Secretary of State resolved to “call in” one application and a Public Local Inquiry were held in August 1988 which also took account of an appeal for non-determination of the other. The decision letter issued in March 1989. The conclusion of the Reporter was that this site made a valuable contribution to Green Belt objectives, that the existing boundary was sound, that the suggested elements of planning gain were of little significance and that the proposal should be refused as contrary to Structure Plan Green Belt policy. The recommendation was that planning permission should not be granted to the application called-in by the Secretary of State and that the appeal against failure to determine the other application should be dismissed.

November 1992: application A02694/92 to formalise the existing car parking area and access and to landscape the perimeter area. This was approved in February 1993 and the work was undertaken on behalf of the Edinburgh Green Belt Trust.

Further Planning History paper appended here as Appendix 4.

Appendix 3

Conclusion of 2022 Preliminary Ecological Appraisal Report

The site is included in the Hermitage of Braid and Blackford Hill Local Biodiversity Site (LBS) (a designation of local importance), is within 1 km of two further LBSs, and is adjacent to Hermitage of Braid / Blackford Hill Local Nature Reserve (also of local importance). A 12.31 ha stand of Ancient woodland (of semi-natural origin) is adjacent to the site on the south and a 28.62 ha stand of plantation origin, approximately 1 km south of the site are listed on the Ancient Woodland Inventory of Scotland.

The majority of the site comprised of neutral semi-improved grassland, with two small copses of broadleaved semi-natural woodland and a very small extent of marsh/marshy grassland and scattered scrub, which may constitute a Ground Water Dependent Terrestrial Ecosystem. Surrounding habitats include extensive seminatural broadleaved woodland, dense scrub and neutral semi-improved grassland, as well as allotments and residential urban areas.

Badger, bats (common pipistrelle, soprano pipistrelle, and Daubenton's bat), otter and hedgehog were identified as notable and/or protected mammals in the data search. The survey identified a disused badger sett approximately 50 m from the site and an unidentified disused mammal hole approximately 10 m from the site boundary. Several trees with multiple bat roost features of moderate to high potential were identified within the site and trees with veteran features were numerous in adjacent woodland, particularly in ancient woodland to the south of the site. Both roosting and foraging bat potential within the survey area are considered to be high. Although the site itself offers more limited roosting habitat than the surrounding woodland, the open grassland complements adjacent woodland habitat by providing woodland-edge foraging opportunities for bats.

Records of 52 species of bird were found within 1 km of the site including 15 Red listed, 18 Amber listed species, 13 SBL, and three LBAP species.

Three species of amphibian were identified in the data search including common toad (SBL).

While no reptile records were found, habitat features with the potential to support reptiles, including cracks in stone walls, stone piles and fallen deadwood at woodland edge locations were recorded during the survey.

A record of one SBL moth species (cinnabar) was found within the site and records of grayling butterfly (Endangered), small heath butterfly (Vulnerable), 21 SBL species of moth, and 1 LBAP butterfly were found within 1 km of the site boundary within the last 10 years. The data search also identified historic records of two Nationally Scarce beetles, a SBL bee and four SBL wasp species, all of which may be supported by habitats present within the site.

Records of one Schedule 8 species, 15 SBL, three LBAP, 13 NS, one Endangered, two Vulnerable, and 3 Near Threatened plant species were found within 1 km of the site boundary were identified in the data search and two further NS species were cited in the Hermitage of Braid and Blackford Hill Local Nature Reserve Management Plan (City of Edinburgh Council, 2011).

While the grassland habitat within the site is of relatively low floral diversity, it has the potential to support notable and/or protected species of mammal (particularly bats), birds, amphibian (common toad), reptiles and invertebrates (deadwood and flower associated species). There is

also potential for the grassland to be managed to promote greater floral diversity, since it has suffered from minimal management including cessation of grazing in recent years, as well as nutrient enrichment as a result of dog walking activities.

Key ecological features identified within Midmar Paddock or supported by habitats in the site include:

- Potential bat roost features in trees;
- Habitat providing bat foraging opportunities along woodland margins and around the small extent of wetland habitat present;
- Habitat linkages providing a potential otter commuting route between Braid Burn and Hermitage of Braid pond, (viz. Blackford Pond) where otters have been recorded in the past;
- Habitat providing nesting opportunities (predominantly in trees and scrub), which may support bird species with conservation designations.
- Foraging habitat for a wide range of birds include numerous species with conservation designations.
- Veteran trees with deadwood features and open habitats which may support invertebrate communities of conservation importance, including life stages of numerous notable invertebrate species identified in the data search; and
- Sensitive habitats which may correspond with Annex I habitats, GWDTEs or SBL priority habitats. These include semi-natural broadleaved woodland and marshy grassland.

In addition Midmar Paddock provides a buffer to negative impacts on habitats of higher conservation value, including ancient woodland, scrub and grassland habitats in Hermitage of Braid and Blackford Hill Local Nature Reserve, which are of high local importance (City of Edinburgh, 2011). Without the buffering effect of Midmar Paddock, potential negative impacts from light pollution, diffuse pollution (such as nutrient enrichment and pesticide runoff), and disturbance to adjacent sensitive habitats at Hermitage of Braid and Blackford Hill could occur.

Any loss or decline of habitats within the site could result in detrimental impacts on the features outlined above. At a landscape scale, Midmar Paddock also contributes to ecological habitat networks, which are important in supporting biodiversity. Incremental loss of habitats leads to fragmentation and decline of species populations. Therefore while Midmar Paddock is of relatively low local importance in isolation, its value is considerably higher when viewed in combination with other adjacent habitats, as indicated by the inclusion of Midmar Paddock in the Hermitage of Braid & Blackford Hill LBS designation. In recognition of the contribution habitat fragmentation has had on biodiversity, the Edinburgh LBAP highlights the importance of green networks for ecology at a landscape scale (Edinburgh City Council, 2019). Midmar Paddock provides a buffer to the high conservation value habitats present at Hermitage of Braid, while complementing these habitats by providing open habitats. Together these habitats contribute to the ecological habitat networks within the city landscape.

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14 June 2022

Appendix 4

9 July 2016

Extracts from Scottish Government's Report on the Edinburgh Draft Local Plan June 2014 with particular reference to Midmar Paddock.

Proposer: Amend green belt boundary to exclude land at Midmar from the Green Belt and allocate it for housing development (8-10 dwellings). States that the site would comply with SDP Policy 7 and would not undermine the green belt objectives. All infrastructure would be funded by the developer. The site is not identified as Grade 1 agricultural land, is considered to be effective and deliverable and will meet the shortfall in the housing land supply. (2244 Blackford Hill Limited)

Amend green belt boundary to exclude land at Midmar from the green belt and allocate it for housing development. (2244 Blackford Hill Limited)

Most of these proposed housing sites were the subject of representations to the first Proposed Plan. Midmar Paddock • Suggests removing the site from the green belt and allocating it for housing development with associated open space/community uses/greenspace proposals. PROPOSED EDINBURGH LOCAL DEVELOPMENT PLAN 593 States that it has the capacity for 8-10 houses, with the remaining 2ha for new greenspace. It complies with SDP Policy 7 in by being in keeping with the character of the adjacent built development and not undermining the green belt objectives. The site is not identified as Grade 1 agricultural land, is considered to be effective and deliverable, and will help meet the shortfall in housing land supply. Any additional infrastructure required will be committed or funded by the developer. (2244 Blackford Hill Limited)

SG: The suggested green belt change to land at Midmar and suggested housing allocation has been assessed. The assessment criteria are explained in the LDP Environmental Report. These changes are not supported for the reasons explained in Issue 17. No modification proposed. (2244 Blackford Hill Limited)

Other locations in the green belt for housing 13. Land at Craiggrook Road, **Midmar** and Duddingston Golf Course is assessed through Issue 17. This includes assessment of their contribution to green belt objectives and whether they merit current inclusion in this local development plan. Our conclusions on these sites do not support their deletion from the green belt and consequently Policy Env 10 would continue to apply. **86 individuals submitted in support of Midmar Paddock** (See Issue 17 Appendix A)

Representations:

Supports the designation of Midmar Paddock as green belt, open space, Local Nature Conservation Site and Special Landscape Area. Considers that the site is important in terms of contribution to landscape and setting of the conservation area. It also contributes to the ecology, provides an amenity space and establishes a clear green belt boundary. The field is also identified by the Allotment Strategy Group as a potential site for extension of the allotment site. Support non-designation of site for housing in the Plan. (0511 Friends of the Hermitage of Braid; 0579 Esk Valley Trust; 1973 Morningside Community Council; 1976 Midmar Allotments

Association; 2297 Friends of Craighouse; 2662 Ian Murray MP; 86 individuals listed in Issue 17 Appendix A)

Modifications sought by those submitting representations:

Midmar Paddock • Suggests removing the site from the green belt and allocating it for housing development with associated open space/community uses/greenspace proposals. States that it has the capacity for 8-10 houses, with the remaining 2ha for new greenspace. (2244 Blackford Hill Limited). • Supports the designation of Midmar Paddock as green belt, open space, Local Nature Conservation Site and Special Landscape Area. (0511 Friends of the Hermitage of Braid; 0579 Esk Valley Trust; 1973 Morningside Community Council; 1976 Midmar Allotments Association; 2297 Friends of Craighouse; 2662 Ian Murray MP; 86 individuals listed in Issue 17 Appendix A)

Summary of responses (including reasons) by planning authority:

A representation for a smaller site at Midmar Drive was submitted to the first Proposed Plan. The Environmental Report – Second Revision, Volume 2, June 2014 p30 concluded that the site was considered too small to identify as a housing proposal in the Plan. The potential for housing development on this site would be better addressed through the planning application process. This representation refers to a larger area of land at Midmar Drive. The site has been assessed in the Environmental Report Addendum, using criteria, which includes whether it was brownfield or greenfield, availability of the site for development, accessibility to existing public transport, opportunities for enhancing public transport, level of infrastructure capacity, opportunities for enhancing infrastructure, the landscape setting of the city, whether the site can create clear and defensible green belt boundaries, integration with the character of the settlement and impact on countryside recreation. Current public transport accessibility was found to be acceptable for the majority of the site. Development of the site was found to impact adversely on the landscape setting of the city due to the loss of landscape features and views of the city-wide importance. The existing road is a clear green belt boundary allowing key city views. The development would result in a poorly defined boundary. Development of the site would introduce urban residential development into an area of open space on the western fringe of Blackford Hill thereby diluting the clear definition between the single sided urban street and the open landscape which define the boundary of the adjoining Morningside Conservation Area. The development would restrict views and informal access routes across the open space, thereby harming countryside recreation. The allocation of this site would not be appropriate in terms of compliance with Scottish Planning Policy and SDP Policies, as identified in the Council’s housing site assessment. This site should be retained in the green belt. No modification proposed.

Reporter’s conclusions:

Midmar Paddock Site selection and accessibility:

9. This comprises two adjoining paddocks of green belt land, separated only by a public footpath, within a larger area of open space known as The Hermitage of Braid that also encompasses wooded valleys along the Braid Burn. The site is located immediately to the north of Braid Burn and Blackford Hill and to the west it abuts residential areas within Morningside Conservation Area. The site is within an area identified as protected open space for grazing and this is crossed by a number of linked un-surfaced footpaths, which were well used by recreational walkers during my site visit. Whilst the site is solely accessed on foot, it is

reasonably accessible by public transport. It adjoins the junction of Hermitage Drive and Midmar Drive where there is a small public car park for visitors wishing to access the walks through the site linking to others further afield in the PROPOSED EDINBURGH LOCAL DEVELOPMENT PLAN 605 countryside areas immediately to the south and east.

10. In the above context I am concerned, firstly, that the proposed allocation for housing development, no matter how well designed and landscaped, would impact adversely to an unacceptable degree on the role of this land as one of the key points of access leading into the Hermitage of Braid and Blackford Hill Local Nature Reserve (LNR). This includes the historic Hermitage House located within a secluded valley to the south of the site in question. This area, as well as having significant heritage and landscape qualities, appears to be widely used and enjoyed by visitors for its unspoilt rural character on the fringe of the built-up area of this part of the city. This is reflected in the number of representations lodged and the concerns that have been raised by those objecting to the proposed allocation. Based on the considerations summarised above and others outlined below, I share many of those concerns.

Green Belt and landscape considerations

11. The proposal as well as seeking the site's removal from the green belt proposes a housing allocation here for 8-10 houses with the remainder of the land being retained as green space. In support of this position it is contended that this would not be in conflict with development plan policies, would be in keeping with the character of the adjacent residential area, as well as not undermining green belt objectives. **I do not find those arguments persuasive and instead consider that they are outweighed by the detailed site-specific and policy-based case for maintaining the 'status quo' – as being advocated by the council and by those registering concerns about the proposal. In summary, for the reasons outlined below I find most compelling the evidence that justifies retaining the site in the green belt and protecting it against the likely adverse effects on the local ecology and recreational amenity if the site was reallocated, even in part, for housing development.**

12. More specifically I am concerned that the proposal would allow urban expansion, albeit in a limited form, into an area of accessible and well-used recreational open space that is also performing a valuable role in the green belt. As such in my view this land should be safeguarded from built developments. I am also concerned that such an allocation would lead to a less clear and less defensible definition of the remaining greenbelt land and in my opinion, it would erode the overall integrity of the Hermitage of Braid area and its heritage and recreational values, which appear to be well respected and appreciated by local users and visitors. Furthermore, given the fact that it is overlooked from higher vantage points, at the local and strategic levels I conclude that the proposed allocation would be wholly inappropriate as **the resulting development would have a significant adverse impact on the visual amenity and landscape setting of this part of the city**, which merits being protected.

13. Based on the available evidence, the considerations outlined above and my own site visits, I conclude that the site today meets the purposes of and criteria for green belts summarised in paragraphs 49 and 52 of the Scottish Planning Policy (SPP). As development of part of the site for housing would have a significant adverse effect on local and wider views of this and adjoining parts of the green belt I consider that this would be inappropriate and unjustified. I conclude that the proposal would not be consistent with the terms of policy 12 of SESplan or paragraph 34 of the proposed plan - both of which highlight that one of the objectives of green

belts is to protect and provide opportunities for access to open space and the countryside. Furthermore, I conclude that the proposal would not satisfactorily address criteria (a) and (b) of policy 7 of SESplan. PROPOSED EDINBURGH LOCAL DEVELOPMENT PLAN 606 Based on all of these considerations, **I conclude that the proposed allocation would be wholly inappropriate and instead the site should be retained unaltered for its important contribution to the green belt as well as for its recreational value. The site and its adjoining visitor car park were both being well used by walkers during my site visit, which was consistent with the statements made in representations lodged objecting to the loss of the recreational opportunities here if the site was reallocated.**

14. Given the above conclusions, which in combination rule out the principle of this allocation, I have not given close consideration to other matters such as educational provision, and the adequacy of other infrastructure capacities of local community facilities and services to serve any new residential development on the site in question. I do not consider the benefits of adding to the housing land supply would outweigh the adverse impacts identified above.

END