

Northfield & Willowbrae Community Council

Comments on '*Outline Strategic Plan for Holyrood Park - September 2023*'

While Northfield & Willowbrae Community Council (N&W CC), have not undertaken specific, direct canvassing of the local community on Historic Environment Scotland's new '*Outline Strategic Plan for Holyrood Park*', it did consider the draft document at its meeting of 14th November 2023.

The Community Councillors resolved to make the following representation on the plan. Individual members have also responded individually, via the consultation link. The HES consultation link was placed on the community council's Facebook page to encourage other local responses.

N&W CC would wholly endorse the opening statement in the Executive Summary (and repeated in the '*Statement of Purpose*' first paragraph) that '*Holyrood Park is truly a city park like no other,.....*'

The following comments and observations are divided into **general**, **major** and **minor points**.

General points -

This plan is limited to broad objectives rather than detail. Presumably this is because HES want to see what support there would be for these broad and major changes to the management and use of the park. Northfield & Willowbrae Community Council (N&WCC) should have the opportunity to comment in detail on the several proposed subject plans to follow over the next few years and hence would welcome confirmation from HES that the community council will be consulted on these other subject plans?

N&WCC would wish to offer the services of the community council in communicating with the local community within the N&WCC area, (although we cannot act in this way for other communities adjacent to Holyrood Park given their 3 respective community councils – e.g.; Old Town CC / Southside CC / Grange & Prestonfield CC).

Most of the objectives and their components are uncontroversial and indeed would likely be welcomed by most people. However, the details of implementing their delivery and the ways in which conflicts between objectives will be resolved (as will be set out in subject plans), will be crucial and local people will need to be convinced about the choices made. Again, N&WCC would like to be involved as a voice of community opinions at these future stages.

Major Points - There are three:

- 1) **Objective 5: Traffic** - "*Steps will be implemented to very substantially reduce, or remove all, vehicular through traffic from the Park*" - this is a proposal on which it appears that there is no consensus in the local community and that consideration of the wider implications will be necessary, as well as thorough consultation with local residents. Hence, HES should recognise this aspect at the outset in the Outline Strategic Plan and indicate the general steps involved and a general timescale over the 10 years of the Strategic Plan to consider this major proposal and the potential various options and what consultation will be undertaken before any further decision is made.

- 2) **The re-opening of the Radical Road footpath** – ‘Access & Movement’ section (Page 35) - It was expected to see specific reference to the closed Radical Road footpath in this section. This appears to be a glaring omission in the Strategic Outline Plan given the path has been closed for over 5 years and the recent adverse national press coverage for HES with concerns raised by Scotways, Ramblers Scotland, The Cockburn Association and others. It is a major community issue that needs addressed in the Strategic Plan. N&WCC appreciate the risk and liabilities issues confronted by HES, but there must be some indication on how this path resource can be re-opened, or partially re-opened and the general timescale involved and the removal of the unsightly security fences & notices at either end that do not in any way contribute to the setting of the Park.

- 3) **Entrance Lodges at Duddingston and Meadowbank** – N&WCC are aware of the recent refusal of planning applications for both these properties as Short Term Lets. As these are valuable assets located within the Park HES should give an indication what may be their future use and also the use of the other two lodges at the Holyrood Road Park (west) entrance and near the Prestonfield ponds / Innocent railway tunnel east entrance. Suggestions to consider could be perhaps as a small café(s) that would complement the other cafe opposite the parliament, or letting them to families on long term lets due to the recent ‘Housing crisis’ declared by the City Council.

Minor Points (in order of draft text)-

‘Contents’ – this should list the numerous supporting Appendices after ‘Section 6’ that appear in the separate document, but are referred to in the text (e.g.; Page 19 / para 1; Page 23 / para 1 etc.)

‘Overview’ (Page 9) - With the reference in 1st para / line 4, “*It has the potential to measurably improve peoples’ lives and wellbeing; to help us adapt to the ongoing and deepening* (perhaps also insert, ‘**Biodiversity and**) *climate crisis*”; to reflect the urban nature conservation issues that such a large area of public land use in the city centre can help contribute towards over the next 10 years of this Plan.

Map on Page 11 - ‘Holyrood Park - Edinburgh Context’:

- ‘Haymarket Station’ and the ‘The Meadows’ captions seem to have been transposed !
- Perhaps ‘**Portobello Beach**’ should be inserted on the coast as a significant feature;
- and insert ‘**Leith Docks**’ to clarify.

Map on Page 12 - ‘Holyrood Park - Site Features’:

- Two of the captions (‘Hunters Bog’ & ??) on the left of the map are obscured.
- There is no reference to the ‘**Radical Road path**’, nor the ‘**Radical Road**’ itself, though it is referred to in the text (Para 2 / line 3). These should be included on the map.
- Consider adding a reference to the ‘**Hutton Section**’. Further info: <https://www.historicenvironment.scot/about-us/news/new-digital-models-of-salisbury-crags-hutton-section-and-hutton-s-rock/>

Para 1 insert into the sentence *“the Park has been largely undeveloped (excepting some quarrying, land drainage (Add ‘**Road construction**’ i.e.; as this was another important land use change since 1541) and military activity),..... ”*. This aspect is referred too on Page 31 /para 1 / line 4.

Page 13 – ‘*Current Management*’ - and reference to the current staff structure, it would be helpful for an organisational chart to be included, perhaps as an Appendix, to aid understanding of the general duties, coverage and lines of HES management reporting.

Page 13 / last para - with the comment *“Duddingston Loch is managed by the Scottish Wildlife Trust under the terms of a lease with HES”*, it would be helpful if the extent of this lease area was shown on the above ‘*Holyrood Park - Site Features*’ map.

Page 15 / last line - in relation to ‘*Review of Designations*’, and the comment, *“It is expected that the initial consultation process will be undertaken in **2023**.”* – due to the timescale this should now read ‘**2024**’. Northfield & Willowbrae Community Council would be happy to participate in any review of designations in and around Holyrood Park and their related boundaries.

Page 17 Map ‘*Wider Green Infrastructure Context*’ - ‘*Duddingston Playfield Fields*’ are located in the wrong position and denotes the southern half of the golf course. The playfields are further west towards Duddingston Loch.

Page 19 Map of Walking & Cycling times - would it be worth inserting onto the map the names of the surrounding communities i.e.; ‘**Duddingston**’, ‘**Northfield**’, ‘**Craigmillar**’, ‘**Portobello**’, ‘**Leith**’, ‘**Prestonfield**’, etc., etc., to give some general context to the communities involved and within the walking & cycling catchments?

Page 23 - ‘*Legislative Context*’ - the various policies should be listed with the most recent first, rather than a scatter-gun approach; e.g. see ‘*Environmental Legislation*’ section.

Page 24 - N&WCC are supportive of the statement, under the ‘*National Context*’ section relating to ‘*Communities – we live in communities that are inclusive, empowered, resilient and safe*’, that *“.....community involvement and benefit is a priority for the future of Holyrood Park”*.

Page 25 - it would be worth all the national policies listed relevant to Holyrood Park to have a date inserted when enacted and also arranged in date order. This also applies to the following section (Page 26) on ‘*Local Context*’ policies and the list of HES policy documents at the end of Page 27 to define how recent they are as they will date in the context of a 10 year plan.

Page 26 – ‘*Local Context*’ – it would be worthwhile having a sentence under each strategy summary on how Holyrood Park may input e.g.; this is evident under the ‘*Edinburgh Biodiversity Action Plan*’ section, but not in the other policies sections.

Page 27 – it would be helpful if there was a short paragraph in this section outlining what HES / & previous Historic Scotland management plans were in operation before this draft ‘*Outline Strategic Plan for Holyrood Park*’. There could be a tabulated Appendix in the separate document that runs through the last management plan actions with a short commentary on what was achieved and what actions could be transferred to the new Strategic plan, or those that are no longer relevant.

Page 29 / para 3 – ‘Purposes & Principles’ section 4 - N&WCC wholeheartedly commend the statement under ‘Purpose’ that “.....needs to reflect the fact that as a major public open space, Holyrood Park is not a typical HES property..... “

Page 29 / para 3 – ‘Statement of Purpose’ section - rather than referring to “.....enabling people to escape the City”; perhaps should read “.....enabling people to escape the urban environment “

Page 30 - ‘Guiding Principles’ - N&WCC are supportive of the first / key guiding principle relating to ‘putting people first’ and would seek future involvement to help meet the statement that, “It is critical that residents, interest groups and local communities play a leading role in shaping the future of the Park, and that the shape of its future use and development is created in partnership with them through a people centred approach”. This could be in the form of hosting with HES, future park issue specific meetings with residents from the Northfield & Willowbrae community. There may be scope for local volunteer involvement in emerging environmental and other projects.

Page 31 – Principle 4: ‘Be Guided by Nature’ – the penultimate statement that ‘Strategic and operational management decisions, particularly relating to land management, should be founded on the principle of letting natural processes lead the way’, seems at odds with the earlier reference on page 12 under ‘Context’, that “..... these grassland habitats have been subject to different management regimes and are now in an unfavourable and declining condition“, as the inference is that if habitats are poor, they should remain so (although the intention is that this is not the case). Perhaps the penultimate sentence needs re-worded to clarify interventions will be proposed to improve land management.

Page 31 - Principle 6: ‘Experiment & Learn’ - consider removing / re-wording the initial statement: “There is no template or fixed manual for the future of Holyrood Park” as this rather undermines the need for producing the 10 year ‘Outline Strategic Plan’.

Page 33 – ‘Vision Statement 2023 - 2034’ – while most of the statements are supportable and the reference to climate change and environmental issues have been covered in preceding sections, the reference (para 5) to ‘Vehicular traffic will largely cease, and active travel will become the primary mode of transport across the Park’; has no lead-in. Perhaps the section (Page 26) on ‘Local Context under ‘The City Centre Transformation Strategy’ and ‘The City Mobility Plan’ references needs slightly expanded to explain where this aspiration derives from, or a link to Appendix B / Page 25. Also there seems to be no reference to the HES consultation on this specific issue carried out in 2021 and reported on in 2022. A summary of its results and conclusion, or a web-link to the report, could be placed in Appendix B.

Last statement, (Para 6 / line 1) ‘All this will be delivered by partnership between the people of Edinburgh and key organisations’ - it would help if these ‘key’ organisations were named e.g. ‘**City Council , NatureScot, Scottish Wildlife Trust and the surrounding adjacent community councils**’.

Page 34 - minor – the picture used cuts someone in half ! and doesn’t add anything to the document.

Page 34 - Future landscape Objective 1: - first bullet point – ‘Significant improvement to surface water management to help safeguard Edinburgh’, perhaps should refer to ‘surrounding communities’ rather than the whole city.

5th bullet point – “*Increased carbon sequestration through vegetation and soils*”, should ***‘management’*** be added to the end of this point to clarify the objective?

Objective 2 – surely the park, under management by HS since the 1970s’ already has a host of “*habitat surveys*” as baseline information?

Page 35 – ‘*Access & Movement*’ section Objective 3 / para 3: “*signage will be implemented, and offsite (insert - ***as well as on-site***) information revised and improved*” - i.e.; interpretation information within the park for the many archaeological, historical and nature conservation aspects are sadly lacking.

Minor – there is a footnote, ‘4’, at the foot of page 35, but no reference to it within the text.

Page 36 - ‘*Facilities*’ section – Objective 6: consider adding a 6th bullet point to “*.....address the following key areas*” i.e.; ‘***Existing entrance lodges re-uses***’, given the considerable recent investment in the Duddingston (South) Lodge that has been refused planning permission as a Short Term Let, as well as the lodge at St Margaret’s Loch entrance and the other lodges at Holyrood Rd and Prestonfield. HES should address in the Outline Strategic Plan what is the long term future of these valuable, public assets.

Minor – the photo of birdlife on St Margaret’s Loch at the foot of the page is out of focus (as is the photo on the following page - 37).

Page 38 – ‘*Governance and Stewardship*’: Objective 8 – while diminishing budgets available to HES to manage Holyrood Park are fully appreciated, in terms of the reference to “*.....steps will be taken to significantly increase revenue from the Park....*” (Line 2), could HES give a general indication of what these proposals may entail, so that stakeholders understood the possibilities that could come under consideration over the next 10 years?

Objective 10: ‘*Create a volunteer base to support conservation and other activity*’ – N&WCC would be interested in further discussions on forming this ‘*Friends of*’ group and exploring what activities they might undertake.

Objective 11: ‘*New Regulations for a New Park*’ – the introduction of Scottish Ministers role in park management rules is just introduced here on Page 38. It would be worthwhile outlining and summarising, in the ‘*Current Management*’ section (page 13), their unusual role with regard to Holyrood Park, compared to other public open spaces.

Page 41 – ‘*Key Strategies And Plans For Development*’ – there are a considerable number of proposed plans listed - 11 in total with numerous sub-actions involved to feed into them that could take the proposed 10 years of the Outline Strategic Plan to complete. They will also be time consuming for staff and costly if all involve consultants. It would be useful if they were listed in order of priority and a general timescale allocated over the 10 years of the Plan.

It is expected that a ‘*Strategic Environmental Assessment*’ (SEA) should be conducted for the Outline Strategic Plan that would then mean individual SEAs were not required for each of the dozen or so emerging Action Plans.

Under 'Conservation Management Strategy', clarify that the 'Conservation Plan' is a **Built Conservation Plan** rather than for Nature Conservation.

Other Comments –

'Overview' / Page 11 - 'While no exact figure exists for the number of visits to the Park per annum,' – perhaps HES should consider obtaining this baseline information from a Visitor Survey within the early years of the Strategic Plan?

Would it be worth captioning the numerous photos used throughout the Strategic Plan to give them some context?

There are not many places in Scotland of which it can be said it has not had major interventions for almost 500 years since it was enclosed in 1541. This must be the basis of scope to manage or re-introduce native species such as more woodland on the fringes of the Park to contribute towards climate CO2 absorption and reducing the cities heat island effect, or wildflower meadows at appropriate locations where community groups could get involved in implementation and management of such improvement projects.

N&WCC were appreciative of the two HES rangers for Holyrood Park who attended the 2023 'Environment Fair', organised by the Community Council at Northfield Community Centre on Saturday 23rd September. Using this annual event and perhaps other individual events focused on the park, hosted at the Community Centre, arising from the detailed management plans should be considered by HES.

N&WCC would be happy to help promote and facilitate such future meetings to try and engage a wider selection of the surrounding community in relation to their use of Holyrood Park.

Meadowbank entrance to the park - main cycle path is in great need of improvement e.g. re-design for sharing with pedestrians with emphasis on the dangerous section near St Margaret's Loch (where path just stops and cyclists can only re-join the road).

On the other side of the park, the access steps up to St Leonards should be made wheel chair and bike friendly, as the current Dumbiedykes path is too steep for many users.

There is an extensive amount of graffiti along the high brick wall at Dumbiedykes (along Holyrood Court) that is very visible from the path and adjacent Queen's Drive road through this part of the Park. Ideally it could be power-washed and treated with anti-resistant paint to try and deter and minimise further large scale graffiti.

Paths / links / signs to other Edinburgh facilities – there is a need for signage from the park's Meadowbank entrance to Lochend and Portobello. Hopefully the new Meadowbank Village development will, in the future, improve the routing to these areas.

Current models of land management in Scotland - Holyrood Park, given its unique and iconic status could be managed like a mini/urban version of the Cairngorms National Park, with consideration to suitable path construction (some of which is complete at Jacobs Ladder steps or well underway at Pipers Steps) and signage, erosion, native forest and wildlife / plant diversity. More could be made of the Hutton section e.g. better signage and information on the geology of the park.

'Appendices' Document –

It would be helpful if there were a contents list for both Appendices, A & B.

Page 19 – *'Edinburgh Open Space Strategy'* and reference to *'Located within the Strategy's North East Locality Action Plan'* – would it be useful to summarise in a sub-section what are the specific actions from this Action Plan related to Holyrood Park?

Page 29 – in relation to the City of Edinburgh Council recently launched a draft Vision and Strategy for their greenspaces *"Edinburgh's Thriving Greenspaces 2050"* (October 2022), and the value of the associated green infrastructure, there is comment, *"We are not aware of any similar study having been undertaken for Holyrood Park at this time. Understanding the value of the social, economic and environmental benefits for the City's residents generated from investment in Holyrood Park would be beneficial for negotiating future core funding settlements from Scottish Ministers, and in supporting the business case for capital funding bids."*

However, this Social Return on Investment study is not listed within the Outline Strategic Plan *'Key Strategies And Plans For Development'* on page 41 and it should be and perhaps prioritised if it would support the case for more funding, or specific project funding within the Park over the next decade.

Finally, Page 31 - *"Further plans and statements"* states, *'The following are also relevant'*: but just lists four plans without saying why they are relevant, as occurs with the various strategies covered above in Appendix B. These final four Frameworks and Statements should also be summarised as to how they relate to Holyrood Park.

It would be helpful in HES acknowledge receipt of these comments and observations and Northfield & Willowbrae Community Council look forward to receiving a response to the various points. As outlined above, the Community Council is very keen to work with HES to continue the improvement of the Park for the surrounding residents, as well as visitors.

(END)

(V4 Finalised – 16.12.23)