

Customer Ref: 01750 Response Ref: ANON-KU2U-GWP4-9
Name: Stuart Szylak
Response Type: Agent / Consultant
On behalf of: A Brewster and Sons

Supporting Info:
Email: stuart@rickfincassociates.com

Choice 1 A

We want to connect our places, parks and green spaces together as part of a city-wide, regional, and national green network. We want new development to connect to, and deliver this network. Do you agree with this? - Select support / don't support

Short Response:

Explanation:

Choice 1 B

We want to change our policy to require all development (including change of use) to include green and blue infrastructure. Do you agree with this? - Support / Object

Short Response:

Explanation:

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On behalf of:

Choice **1 C**

We want to identify areas that can be used for future water management to enable adaptation to climate change. Do you agree with this? - Yes / No

Short Response

Explanation

Choice **1 D**

We want to clearly set out under what circumstances the development of poor quality or underused open space will be considered acceptable. Do you agree with this? - Yes / No

Short Response

Explanation

Choice **1 E**

We want to introduce a new 'extra-large green space standard' which recognises that as we grow communities will need access to green spaces more than 5 hectares. Do you agree with this? - Yes / No

Short Response

Explanation

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Choice 1 F

We want to identify specific sites for new allotments and food growing, both as part of new development sites and within open space in the urban area. Do you agree with this? - Yes / No

Short Response

Explanation

Choice 1 F

We want to identify specific sites for new allotments and food growing, both as part of new development sites and within open space in the urban area. Do you agree with this? - Upload (max size 3mb)

Short Response

Explanation

Choice 1 G

We want to identify space for additional cemetery provision, including the potential for green and woodland burials. Do you agree with this? - Yes / No

Short Response

Explanation

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Choice **1 H**

We want to revise our existing policies and green space designations to ensure that new green spaces have long term maintenance and management arrangements in place. Do you agree with this? - Yes/No

Short Response

Explanation

Choice **2 A**

We want all development (including change of use), through design and access statements, to demonstrate how their design will incorporate measures to tackle and adapt to climate change, their future adaptability and measures to address accessibility for people with varying needs, age and mobility issues as a key part of their layouts. - Yes / No

Short Response

Explanation

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Choice **2 B**

We want to revise our policies on density to ensure that we make best use of the limited space in our city and that sites are not under-developed. Do you agree with this? - Yes / No

Short Response

Explanation

Choice **2 C**

We want to revise our design and layout policies to achieve ensure their layouts deliver active travel and connectivity links. Do you agree with this? - Yes / No

Short Response

Explanation

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Choice **2 D**

We want all development, including student housing, to deliver quality open space and public realm, useable for a range of activities, including drying space, without losing densities. Do you agree with this? - Yes / No

Short Response

Explanation

Choice **3 A**

We want all buildings and conversions to meet the zero carbon / platinum standards as set out in the current Scottish Building Regulations. Instead we could require new development to meet the bronze, silver or gold standard. Which standard should new development in Edinburgh meet? - Which standard?

Short Response

Explanation

Choice **4 A**

We want to work with local communities to prepare Place Briefs for areas and sites within City Plan 2030 highlighting the key elements of design, layout, and transport, education and healthcare infrastructure development should deliver. Do you agree with this? - Yes / No

Short Response

Explanation

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Choice **4 B**

We want to support Local Place Plans being prepared by our communities. City Plan 2030 will set out how Local Place Plans can help us achieve great places and support community ambitions. - How should the Council work with local communities to prepare Local Place Plans?

Short Response

Explanation Yes, but where will resource and budget for such exercises come? If every Community Council decided to prepare a Local Place Plan, as is its right, how would the Council respond to this? We can't see how the Council could provide a resource that was meaningful and consistent across each exercise.

Choice **5 A**

We want City Plan 2030 to direct development to where there is existing infrastructure capacity, including education, healthcare and sustainable transport, or where potential new infrastructure will be accommodated and deliverable within the plan period. Do you agree with this? - Yes / No

Short Response

Explanation The availability of education and health facilities have been considered as part of the previous applications relating to the site. It is intended make appropriate health and education contributions in line with the Council's Supplementary Guidance. The Council has aspirations for a new West Edinburgh High School. This would be within the Ratho catchment area and would provide for housing development at this site. The development would comply with the terms of Policy Del 1 and Scottish Government Guidance on planning obligations. Criteria within Policy 7 of SESplan 2013 and Policy Hou1 on the provision of infrastructure in relation to the release of greenfield housing sites can therefore be met. The site is well located in terms of access to public transport and active travel in line with the City Mobility Plan. The A8 Newbridge corridor is identified as a preferred corridor within the Sustainable Travel Study.

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Choice **5 B**

We want City Plan 2030 to set out where new community facilities are needed, and that these must be well connected to active travel routes and in locations with high accessibility to good sustainable public transport services. Do you agree with this? - Yes / NO

Short Response

Explanation

Choice **5 C**

We want to reflect the desire to co-locate our community services close to the communities they serve, supporting a high walk-in population and reducing the need to travel. Do you agree with this? - Yes / No

Short Response

Explanation

Choice **5 D1**

We want to set out in the plan where development will be expected to contribute toward new or expanded community infrastructure. Do you agree with this? - Yes / No

Short Response

Explanation

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Choice 5 D2

We want to use cumulative contribution zones to determine infrastructure actions, costs and delivery mechanisms. Do you agree with this? - Yes / No

Short Response:

Explanation

Choice 5 E

We want to stop using supplementary guidance and set out guidance for developer contributions within the plan, Action Programme and in non-statutory guidance. Do you agree with this? - Yes / No

Short Response:

Explanation

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Choice **6 A**

We want to create a new policy that assesses development against its ability to meet our targets for public transport usage and walking and cycling. These targets will vary according to the current or planned public transport services and high-quality active travel routes. Do you agree with this? - Yes / No

Short Response

Explanation Yes, but would this not disadvantage already deficient areas of the City even further? It should be noted that the Housing Study assessment table for Arbor Lodge is wholly inaccurate when considering Active Travel and Public Transport assessment criteria. The site is located adjacent to a bus route (Service 20) and bus stops are within 300m of the site. The site is within walking distance to Ratho Station industrial estate and employment cluster (1.5km). The site is within walking distance to local convenience services. The Local Path network lies directly to the north and south of the site (Wilkies Basin to Ratho, and Hillend to Ratho Hall paths). The Union Canal Core Path and National Cycle Route lies 450m to the south of the site. The site is well positioned to maximise development in accordance with the City Mobility Plan and the Sustainable Transport Strategy. The nearby A8 is identified as a strategic transport link and can serve development in a sustainable and integrated manner. This includes access to Park and Ride facilities. The site is compliant with the walkable neighbourhood principles contained within Designing Streets. Existing amenities and employment clusters are well within the recommended maximum walking distance of 1,600m as detailed in PAN 75.

Choice **6 B**

We want to use Place Briefs to set the targets for trips by walking, cycling and public transport based on current and planned transit interventions. This will determine appropriate parking levels to support high use of public transport. Do you agree with this? - Yes / No

Short Response

Explanation Who is setting these targets? SPP and other guidance already provides spatial targets for active travel provisions, these should be sufficient. Similarly, parking standards are already in place.

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Choice **7 A**

We want to determine parking levels in development based on targets for trips by walking, cycling and public transport. These targets could be set by area, development type, or both and will be supported by other measures to control on-street parking. Do you agree with this? - Yes / No

Short Response

Explanation Higher targets for city centre locations, lower for urban edge or rural locations.As a site on the urban edge adjacent to a public transport corridor, development at Baird Road will support the City Mobility Plan and restrict demand for vehicular movement in and out of the city. Development could contribute to public transport and car club initiatives as well as electric car charging points.The site scores highly when considering Active Travel (see Objective 6 above).Currently Policies 7 of SESplan 2013 and LDP Policy Hou 1 require developments to provide appropriate infrastructure. This is supplemented by Policy Del 1 Developer Contributions and Infrastructure Delivery. All relevant infrastructure can be provided. The site is accessible by a range of transport modes and located within walking distance of local services and employment cluster.

Choice **7 B**

We want to protect against the development of additional car parking in the city centre to support the delivery of the Council's city centre transformation programme. Do you agree with this? - Yes / No

Short Response

Explanation

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Choice **7 C**

We want to update our parking policies to control demand and to support parking for bikes, those with disabilities and electric vehicles via charging infrastructure. Do you agree with this? - Yes / No

Short Response

Explanation

Choice **7 D**

We want to support the city's park and ride infrastructure by safeguarding sites for new park and ride and extensions, including any other sites that are identified in the City Mobility Plan or its action plan. Do you agree with this? - We want to support the city's park and ride infrastructure by safeguarding sites for new park and ride and extensions, including any other sites that are identified in the City Mobility Plan or its action plan.

Short Response

Explanation

Choice **8 A**

We want to update our policy on the Cycle and Footpath Network to provide criteria for identifying new routes. Do you agree with this? - Yes / No

Short Response

Explanation

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Choice

8 B

As part of the City Centre Transformation and other Council and partner projects to improve strategic walking and cycling links around the city, we want to add the following routes (along with our existing safeguards) to our network as active travel proposals to ensure that they are delivered. Do you agree with this? - Yes / No

Short Response

Not Answered

Explanation

Choice

8 C

We want City Plan 2030 to safeguard and add any other strategic active travel links within any of the proposed options for allocated sites. We also want the City Plan 2030 to include any new strategic active travel links which may be identified in the forthcoming City Plan 2030 Transport Appraisal, the City Mobility Plan, or which are identified through this consultation. Do you agree with this? - Yes / No

Short Response

Not Answered

Explanation

Choice

8 C

We want City Plan 2030 to safeguard and add any other strategic active travel links within any of the proposed options for allocated sites. We also want the City Plan 2030 to include any new strategic active travel links which may be identified in the forthcoming City Plan 2030 Transport Appraisal, the City Mobility Plan, or which are identified through this consultation. Do you agree with this? - Upload new cycle routes

Short Response

No

Explanation

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Choice 9 A

We want to consult on designating Edinburgh, or parts of Edinburgh, as a 'Short Term Let Control Area' where planning permission will always be required for the change of use of whole properties for short-term lets. Do you agree with this approach? - Yes / No

Short Response

Explanation Yes, but how would this fit with the Use Class Order, would it not need a change of law? In what form will this 'consultation' take? Will it be a new Supplementary Guidance approach, or just through the LDP policy review?

Choice 9 B

We want to create a new policy on the loss of homes to alternative uses. This new policy will be used when planning permission is required for a change of use of residential flats and houses to short-stay commercial visitor accommodation or other uses. Do you agree with this? - Yes / No

Short Response

Explanation It is acknowledged that the existing housing stock within the city is under pressure from alternative uses such as short term lets. However, this is also because the supply of new houses is artificially constrained by the available and effective land supply and reliance on brownfield and windfall sites. This issue needs to be seen in the context of the overall requirement and demand for housing in the city from all sources, including visitors and students as well as specialist housing types. We are therefore not in agreement with the Council's estimates in terms of requirement to 2030 as this would provide for a gross undersupply of sites for the city. We are therefore in support of a blended approach to housing land supply for development. Land around Baird Road can contribute to this choice. However, would this new policy fit with the Use Class Order, would it not need a change of law? Such a change is currently permitted development.

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Choice 10 A

We want to revise our policy on purpose-built student housing. We want to ensure that student housing is delivered at the right scale and in the right locations, helps create sustainable communities and looks after student's wellbeing. Do you agree with this? - Yes / No

Short Response

Explanation

Choice 10 B

We want to create a new policy framework which sets out a requirement for housing on all sites over a certain size coming forward for development. Do you agree with this? - Yes / No

Short Response

Explanation

Choice 10 C

We want to create a new policy promoting the better use of stand-alone out of centre retail units and commercial centres, where their redevelopment for mixed use including housing would be supported. Do you agree with this? - Yes / No

Short Response

Explanation

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Choice **11 A**

We want to amend our policy to increase the provision of affordable housing requirement from 25% to 35%. Do you agree with this approach? - Yes / No

Short Response

Explanation Increasing the Affordable Housing quota to 35% essentially requires a ratio of affordable to market housing of 1:2 rather than the current 1:3. This has implications for viability and delivery, particularly given the reliance on more difficult and costly brownfield sites. The Council's approved Strategic Housing Investment Plan (SHIP) 2020-2025 highlights the significant challenges associated with fulfilling the Council's commitment to deliver 20,000 affordable homes over the next 10 years, including securing both land and finance. The new LDP requires to address the shortfall in supply, particularly given the need to deliver in the region of 2,000 affordable homes every year in accordance with the SHIP programme. The SESplan 2 examination acknowledged that new land would require to be released to meet the demand for affordable housing. Delivery of this quantum of development will require more land to be identified in locations such as Ratho. In order to meet the 35% affordable housing objective, the Council will need to take a more realistic and flexible policy to allocation as part of a blended housing land approach.

Choice **11 B**

We want City Plan 2030 to require a mix of housing types and tenures – we want the plan to be prescriptive on the required mix, including the percentage requirement for family housing and support for the Private Rented Sector. Do you agree with this? - Yes / No

Short Response

Explanation This will surely be primarily market driven . How will the council decide what the mix, type and tenure should be for each site? In reality this mix will vary from site to site and by location. The policy needs to attract houebuilders, not hinder them.

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Choice 12 A

Which option do you support? - Option 1/2/3

Short Response: Option 3 (Blended)

Explanation

We are not in agreement with this section of the Main Issues Report or the preferred approach being taken by the Council, which discriminates against locations such as Ratho. There is no strategic guidance and the Council's Housing and Transport studies are currently considered to be unsuitable evidence bases for determining these issues. The proposal to base City Plan 2030 on targets within SDP1 and HNDA2 is therefore open to question and interpretation, for reasons as set out in the MIR itself. On this basis, and in addition to 20,800 affordable houses, the market housing target is 22,600 units. This is a gross underestimate over the plan period. Regarding delivery, the City Council considers that there is currently sufficient land for 47,000 houses. Of this 9,200 has no consent and 16,900 is brownfield or windfall supply. It is not considered that this constitutes a robust or generous supply. The Council's Housing Study is sub divided into two parts which are internally inconsistent and do not relate to equivalent sub-divisions or sectors in the city. In terms of brownfield analysis there are 23 Assessment Areas, none corresponding to Ratho. Two large sites on Baird Road are identified on the Council's derelict and vacant land register but do not feature in the Council's assessment. The brownfield Urban Area Site Assessment identifies 142 sites with development potential and a notional density capacity of 16,900-27,000 units. Based on Figure 4 Estimated Site Capacities, this is considered a gross overestimate of urban brownfield capacity and underestimates the difficulties of delivering such land. The assessment of potential housing land sites is not competent and not properly considered. Regarding greenfield housing land the methodology is 'partially based' on Strategic Development Areas without justification for their continued existence, as opposed to development corridors. It is also undertaken in the absence of information from the Council's emerging West Edinburgh Study. Ratho is considered under Sector 6 which also covers the preferred East Riccarton site which is also outwith the SDA. West Edinburgh is Sector 1 which is only one of two sectors based on SDAs. The evaluation methodology is considered to be flawed and inconsistent, both in its content and detail. Accordingly, we have re-assessed the and re-evaluated the merits of the Baird Road site. RFA has produced an alternative and more accurate and informed scoring for the site, as presented in the attached document. The Sustainable Transport Study identifies Newbridge and the A8 as a Priority Transit Corridor. This emphasises the potential for releasing development sites through the LDP.

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Supporting Info

Name

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Response Type

Agent / Consultant

On behalf of:

A Brewster and Sons

Choice

12 B1

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Support - Calderwood

Short Response

Not Answered

Explanation

Choice

12 B2

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Support - Kirkliston

Short Response

Not Answered

Explanation

Choice

12 B3

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Support - West Edinburgh

Short Response

Yes

Explanation

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Name Stuart Szylak

Email stuart@rickfincassociates.com

Response Type Agent / Consultant

On behalf of: A Brewster and Sons

Choice 12 B4

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Support - East of Riccarton

Short Response Not Answered

Explanation

Choice 12 B5

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Support - South East Edinburgh

Short Response Not Answered

Explanation

Choice 12 B6

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Object - Calderwood

Short Response Not Answered

Explanation

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Choice 12 B7

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Object - Kirkliston

Short Response:

Explanation

Choice 12 B8

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Object - West Edinburgh

Short Response:

Explanation

Choice 12 B9

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Object - East of Riccarton

Short Response:

Explanation

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Response Type

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Choice 12 B10

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Object - South East Edinburgh

Short Response

Not Answered

Explanation

Choice 12 BX

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Explain why

Short Response

Not Answered

Explanation

Choice 12 C

Do you have a greenfield site you wish us to consider in the proposed Plan? - Greenfield file upload

Short Response

Yes

Explanation

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Response Type

On behalf of:

Choice **12 C**

Do you have a greenfield site you wish us to consider in the proposed Plan? - Greenfield file upload

Short Response

Explanation

Choice **12 C**

Do you have a greenfield site you wish us to consider in the proposed Plan? - Greenfield file upload

Short Response

Explanation

Choice **12 D**

Do you have a brownfield site you wish us to consider in the proposed Plan? - Brownfield sites upload

Short Response

Explanation

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Choice **13 A**

We want to create a new policy that provides support for social enterprises, start-ups, culture and tourism, innovation and learning, and the low carbon sector, where there is a contribution to good growth for Edinburgh. Do you agree with this? - Yes / No

Short Response

Explanation

Choice **14 A**

We want City Plan 2030 to support the best use of existing public transport infrastructure in West Edinburgh and accommodate the development of a mix of uses to support inclusive, sustainable growth. We will do this through 'an area of search' which allows a wide consideration of future uses within West Edinburgh without being tied to individual sites. Do you support this approach? - Yes / No

Short Response

Explanation We support the delivery of West Edinburgh as a national priority and believe that the Baird Road site can contribute to this strategy. However, absolute adherence to the Strategic Development Area boundary is not agreed as a spatial approach. West Edinburgh is a fundamental element of the City's Economic Development Strategy. The MIR refers to the West Edinburgh Study but choices have been made without any findings of this Study being available for scrutiny as part of the LDP Choices Report. Baird Road is well placed for the A8 corridor and West Edinburgh identified as a strategic and sustainable public transport corridor. It is also well placed to enhance the City Deal offer in this part of the city.

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Choice **14 B**

We want to remove the safeguard in the existing plan for the Royal Highland Showground site to the south of the A8 at Norton Park and allocate the site for other uses. Do you agree with this approach? - Yes / No

Short Response

Explanation

Choice **14 C**

We want City Plan 2030 to allocate the Airport's contingency runway, the "crosswinds runway" for the development of alternative uses next to the Edinburgh Gateway interchange. Do you agree with this approach? - Yes / No

Short Response

Explanation

Choice **15 A**

We want to continue to use the national 'town centre first' approach. City Plan 2030 will protect and enhance the city centre as the regional core of south east Scotland providing shopping, commercial leisure, and entertainment and tourism activities. Do you agree with this? - Yes / No

Short Response

Explanation

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Choice 15 B

New shopping and leisure development will only be allowed within our town and local centres (including any new local centres) justified by the Commercial Needs study. Outwith local centres, small scale proposals will be permitted only in areas where there is evidence of a lack of food shopping within walking distance. Do you agree? - Yes / No

Short Response

Explanation

Choice 15 C

We want to review our existing town and local centres including the potential for new identified centres and boundary changes where they support walking and cycling access to local services in outer areas, consistent with the outcomes of the City Mobility Plan. Do you agree? - Yes / No

Short Response

Explanation We have had regard to the Commercial Needs Study and this choice is noted. Development at Baird Road offers the opportunity of enhanced community infrastructure and facilities allowing local convenience facilities in Ratho within easy distance of a walkable location.

Choice 15 D

We want to continue to prepare and update supplementary guidance for our town centres to adapt to changing retail patterns and trends, and ensure an appropriate balance of uses within our centres to maintain their vitality, viability and deliver good placemaking. Instead we could stop using supplementary guidance for town centres and set out guidance within the plan. Which approach do you support? - Yes / No

Short Response

Explanation

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Choice 15 E

We want to support new hotel provision in local, town, commercial centres and other locations with good public transport access throughout Edinburgh. Do you agree with this approach? - Yes / No

Short Response

Explanation

Choice 15 G

We could also seek to reduce the quantity of retail floorspace within centres in favour of alternative uses such as increased leisure provision and permit commercial centres to accommodate any growing demand. Do you agree with this approach? - Yes / No

Short Response

Explanation

Choice 16 A1

We want to continue to support office use at strategic office locations at Edinburgh Park/South Gyle, the International Business Gateway, Leith, the city centre, and in town and local centres. Do you agree? - Yes / No

Short Response

Explanation

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Choice 16 A2

We want to support office development at commercial centres as these also provide accessible locations. - Yes / No

Short Response: Not Answered

Explanation

Choice 16 A3

We want to strengthen the requirement within the city centre to provide significant office floorspace within major mixed-use developments. Do you agree? - Yes / No

Short Response: Not Answered

Explanation

Choice 16 A4

We want to amend the boundary of the Leith strategic office location to remove areas with residential development consent. Do you agree? - Yes / No

Short Response: Not Answered

Explanation

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Response Type

Agent / Consultant

On behalf of:

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Choice 16 A5

We want to continue to support office development in other accessible locations elsewhere in the urban area. Do you agree? - Yes / No

Short Response

Not Answered

Explanation

Choice 16 A5

We want to continue to support office development in other accessible locations elsewhere in the urban area. Do you agree? - Do you have an office site you wish us to consider in the proposed Plan?

Short Response

Explanation

Choice 16 B

We want to identify sites and locations within Edinburgh with potential for office development. Do you agree with this? - Yes/No

Short Response

Not Answered

Explanation

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Choice 16 C

We want to introduce a loss of office policy to retain accessible office accommodation. This would not permit the redevelopment of office buildings other than for office use, unless existing office space is provided as part of denser development. This would apply across the city to recognise that office locations outwith the city centre and strategic office locations are important in meeting the needs of the mid-market. Or we could Introduce a 'loss of office' policy only in the city centre. - Yes / No

Short Response

Explanation

Choice 16 E1

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Support - Leith Strategic Business Centre

Short Response

Explanation

Choice 16 E2

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Support - Newbridge

Short Response

Explanation

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Choice 16 E3

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Support - Newcraighall Industrial Estate.

Short Response

Explanation

Choice 16 E4

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Support - The Crosswinds Runway

Short Response

Explanation

Choice 16 E5

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Do not support - Leith Strategic Business Centre

Short Response

Explanation

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Choice 16 E6

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Do not support - Newbridge

Short Response

Explanation

Choice 16 E7

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Do not support - Newcraighall Industrial Estate.

Short Response

Explanation

Choice 16 E8

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Do not support - The Crosswinds Runway

Short Response

Explanation

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Choice 16 EX

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Explain why

Short Response

Explanation

Choice 16 F

We want to ensure new business space is provided as part of the redevelopment of urban sites and considered in Place Briefs for greenfield sites. We want to set out the amount expected to be re-provided, clearer criteria on what constitutes flexible business space, and how to deliver it, including the location on-site, and considering adjacent uses, servicing and visibility. Do you agree? - Yes / No

Short Response

Explanation The existing industrial use for this site is obsolete. Having had regard to the Commercial and Industrial Needs Studies, it is clear that Baird Road is not feasible or viable as a marketable employment site. There is no proposal to retain any class 4, 5 or 6 use on the land and the owners are seeking a change of use to residential.

Choice 16 G

We want to continue to protect industrial estates that are designated under our current policy on Employment Sites and Premises (Emp 8). Do you agree? - Yes / No

Short Response

Explanation

Customer Ref: 01750 Response Ref: ANON-KU2U-GWP4-9

Name: Stuart Szylak

Response Type: Agent / Consultant

On behalf of: A Brewster and Sons

Supporting Info:

Email: stuart@rickfincassociates.com

Choice 16 H

We want to introduce a policy that provides criteria for locations that we would support city-wide and neighbourhood goods distribution hubs. Do you agree? - Yes / No

Short Response: Not Answered

Explanation

Appendix 2 – Baird Road Masterplan



Appendix 2 – Baird Road Masterplan





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Senior Partner

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Representation to Choices for City Plan 2030

Land at Baird Road, Ratho, Edinburgh

Introduction and Context

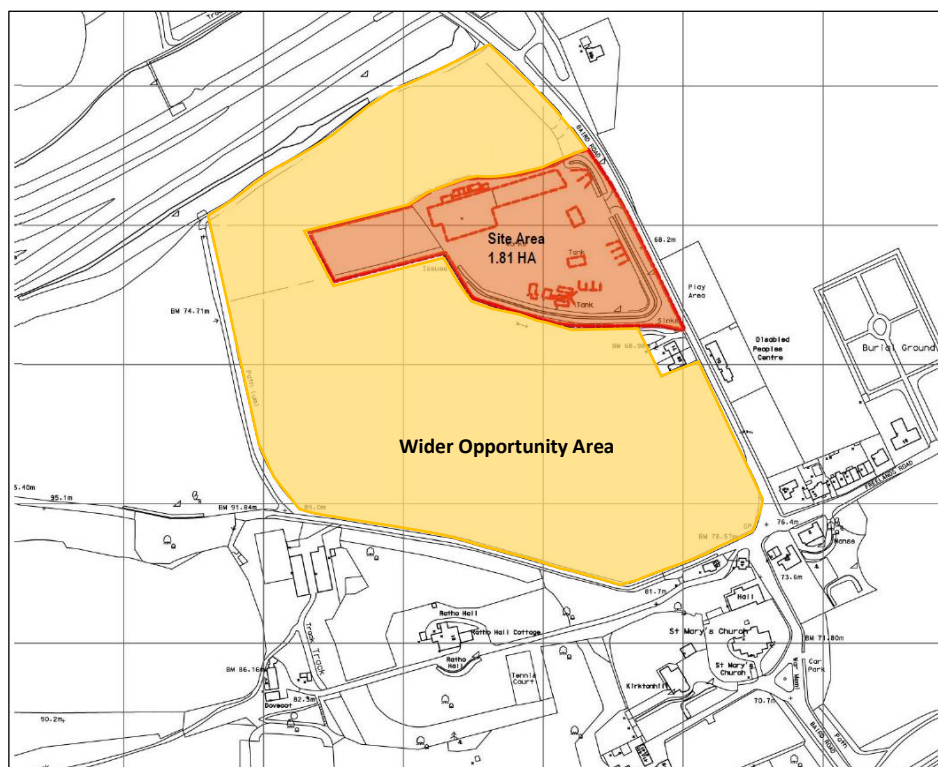
- 1.1 RFA Development Planning is appointed by Mssrs Brewster to respond to the Choices for City Plan 2030, published in January 2020. This submission is made in conjunction with the promotion of land for allocation as a housing development at Baird Road, Ratho, West Edinburgh.
- 1.2 The site benefits from having been considered by CEC as a planning application, ref 16/05637/PPP and 16/02736/PPP. This representation made effectively constitutes an objection to the LDP Choices report in respect of its housing strategy and the exclusion of this land at Ratho.
- 1.3 A meeting to discuss the development of land was held with the City Plan 2030 team in November 2019 to assess the potential for the wider development in this part of north Ratho. Unfortunately, and without good reason, this has been excluded from proper consideration within the Housing Study and site assessments.
- 1.4 In addition, there are inconsistencies in the background supporting reports. There are some significant errors in the Council's assessment tables, particularly for the Arbor Lodge area where the Baird Road site sits.
- 1.5 Furthermore, the West Edinburgh Study is not available for comment making it impossible to give proper consideration of Choice 12 Building New Homes and Infrastructure and Choice 14 Delivering West Edinburgh.
- 1.6 In progressing this exercise we respond directly to the Preferred Choices in the MIR and also re-work the assessment tables and figures where required in order to make these more representative of accurate evidence (Appendix 1). A masterplan is also submitted for consideration (Appendix 2) demonstrating how the site can be developed, meeting the key objectives of the existing and emerging LDP.

Site Description and Location

- 1.7 The site is brownfield, derelict and sits within a Countryside designation. It is included within a wider area named 'Arbor Lodge', as part of the Sector 5 Housing Study prepared by CEC. It also sits within the 'West Edinburgh Area of Search', as identified in the MIR.

- 1.8 Although the site has been designated as part of the Countryside, it is included within CEC's Register of Vacant and Derelict Land (Site 32). Being on the Register indicates the Council's aspiration for this site to be remediated and redeveloped.
- 1.9 The site is approximately 1.8 hectares in area and is located on a former concrete batching plant, now vacant and derelict, in the north of Ratho (see Figure 1). The site has been vacant since 1998 and currently blights the entrance of the village detracting from the overall setting of the area.
- 1.10 Large areas of concrete hardstanding cover the site and unsightly derelict buildings stand within the northern part of the site. The east of the site is bound by Baird Road, the north and west by a further area of vacant and derelict land. To the south of the site is an agricultural field which lies wedged between the village and derelict concrete batching plant which is in separate ownership (Tarmac La Farge). The site makes up a portion of the 'Arbor Lodge' assessment area, as presented in the Council's supporting MIR documentation.
- 1.11 The site could also be combined with a wider area of land owned by Tarmac La Farge to the south, and the Alison Trust to the north. This wider area presents a logical and sustainable extension to the north of Ratho (see Figure 1). This wider area covers much of the Arbor Lodge assessment area, as utilised by CEC. It is demonstrated within this representation that the Greenfield Site Assessment undertaken by the Council for Arbor Lodge is not representative of the actual baseline environment, particularly in relation to active travel, public transport connections and proximity to services and employment clusters. It is recommended that CEC reconsiders and reassesses this part of the Arbor Lodge assessment area.

Figure 1 - Site Location (with wider area of opportunity)



West Edinburgh Location

- 1.12 As indicated above the site sits within the West Edinburgh 'Area of Search' identified in the MIR. The MIR states that "**West Edinburgh is well served by public transport** including the existing tram line from the city to the airport, with a safeguard for a tramline extension past the Highland Centre and Ratho to Newbridge and the Airport express bus routes along the A8".
- 1.13 The 'Area of Search' concept is intended to link with the findings of the West Edinburgh Study, and future decisions by the Scottish Government on uses within West Edinburgh. However, these findings or decisions are nowhere near being finalised. Given this, it is perhaps not appropriate for the Council to make informed decisions on development allocations within any part of the West of Edinburgh at this time.
- 1.14 Regardless, Scottish Planning Policy seeks the most effective and sustainable use of land in appropriate locations, adjacent to available infrastructure. This site at Baird Road is more appropriate in strategic, accessibility and sustainability terms than other preferred or reasonable alternative sites presented within the Choices for City Plan 2030. It must therefore be included as a potential housing site at these early stages of policy development.

Housing Land Requirement

- 1.15 The Second Proposed Strategic Development Plan (SDP2) together with the associated HNDA2 and Transport Strategy, was rejected by Scottish Ministers in May 2019. It is not accepted that CEC's approach of simply using supply targets in SDP1 and HNDA2 is a legitimate or sensible basis for determining the City's housing requirement up to 2032.
- 1.16 An overall requirement of 20,800 Affordable Housing and 22,600 market houses is 'assumed' from SDP1; HNDA2 and the Council's affordable housing commitment. A total Housing Land Supply Target of 43,400 is identified. This target 2019-32 has not been evidenced.
- 1.17 The suggested target of 22,600 market houses is considered a gross underestimate of the actual requirement. This has the potential to significantly underestimate the real requirement and housing supply target for Edinburgh over the plan period.
- 1.18 We are concerned over the robustness of the Effective Housing Land Supply (HLA 2019) and its deliverability over the plan period to 2030. Optimistically it is estimated that there is potential for 47,000 units as of 2019 with 6,100 affordable and 14,800 market housing. This is reliant on 9,200 units without consent and 16,900 houses which is identified through a very optimistic Housing Study.
- 1.19 The Council considers that there is sufficient land with consent within the urban area to deliver the requirement of 17,600 without releasing new greenfield land. Achievement of this target is reliant on mixed use development using employment land with no guarantee or certainty on delivery.

- 1.20 An increased Housing Supply Target of 52,800 is assumed (in MIR Table 2) providing a more realistic requirement of 27,900. Thereafter there is a high-level and lightweight assessment of how these scenarios may be delivered through three options including Option 3 as a 'Blended Approach'.
- 1.21 Although the Baird Road site is vacant, brownfield and included on CEC's register of vacant and derelict land, it does not feature as part of the Council's analysis, other than being part of a wider Site Assessment of 'Arbor Lodge'.
- 1.22 The preferred approach (brownfield, Option1) to deliver new homes by the Council and its partners within the urban area is not considered feasible or viable to allow an annual delivery of 3,340 units per annum. There is no evidence that the Council and its partners can deliver this approach.
- 1.23 A blended approach would in principle appear to be the most practical and realistic approach and is estimated to involve the release of 6,600 units from greenfield sources. However, it is not clear that this would be adequate to meet the city's housing supply target.
- 1.24 In terms of options for housing the Council has not carried out a detailed or comprehensive site assessment of all potential housing sites, such as Baird Road. The brownfield land at Baird Road has not been properly assessed by CEC, nor has the wider site at 'Arbor Lodge' and the assessment must be revisited.

Response to Choices for City Plan 2030

- 1.25 The Baird Road site at Ratho can positively contribute to the four underlying objectives of City Plan 2030 namely:
- A sustainable city which supports everyone's physical and mental well-being.
 - A city where you don't need to own a car to move around.
 - A city in which everyone lives in a home which they can afford; and
 - A city where everyone shares in its economic success.

A sustainable city which supports everyone's physical and mental wellbeing

- 1 Making Edinburgh a sustainable, active and connected city
- 2 Improving the quality, density and accessibility of development
- 3 Delivering carbon neutral buildings
- 4 Creating Place Briefs and supporting the use of Local Place Plans in our communities

A city in which everyone lives in a home which they can afford

- 9 Protecting against the loss of Edinburgh's homes to other uses
- 10 Creating sustainable communities
- 11 Delivering more affordable homes
- 12 Building our new homes and infrastructure

A city where you don't need to own a car to move around

- 5 Delivering community infrastructure
- 6 Creating places that focus on people not cars
- 7 Supporting the reduction in car use in Edinburgh
- 8 Delivering new walking and cycle routes

A city where everyone shares in its economic success

- 13 Supporting inclusive growth, innovation, universities, & culture
- 14 Delivering West Edinburgh
- 15 Protecting our city centre, town and local centres
- 16 Delivering office, business and industry floorspace

- 1.26 It is considered that the LDP Choices Report in its current form risks failure in terms of reducing carbon outputs as well as reducing the level of housing and economic growth possible during the plan period. We are concerned that the exclusion of Baird Road from the Preferred Choices 12a will result in a sub-optimal spatial arrangement and will remove potential social, economic and environmental benefits available to the town of Ratho and the City as a whole.
- 1.27 The following table presents a response to each of the Choices and explains how allocation of the site at Baird Road can contribute to achieving the overall aims and objectives of City Plan 2030.

CHOICE	JUSTIFICATION AND EVIDENCE
<i>A sustainable city which supports everyone's physical and mental well-being.</i>	
<i>1. Making Edinburgh a sustainable active and connected city.</i>	<p>We agree with the option presented within Choice 1 and a strengthening of policies to reflect climate change and a carbon neutral city by 2030. Baird Road, Ratho can assist in achieving this choice. However, achieving this will be difficult if a purely brownfield housing land approach is adopted as recommended.</p> <p>A blended approach towards housing land would be needed to ensure sufficient open space and green and blue networks can be achieved within new development.</p> <p>Policy Env 10: Development in the Green Belt and Countryside states that within the Green Belt and Countryside development will only be permitted where it meets specific criteria and would not detract from the landscape quality and /or rural character of the area: The Ratho proposals do not currently accord with the types of development listed in Policy Env 10. However, this should not automatically preclude housing development where the relevant balance of considerations points to approval and the objectives of the city-wide designation is maintained.</p> <p>The principle of development conforms with the spatial strategy of the development plan and fits with criterion (b) of Policy 12 by directing growth to a location where new development is supported (ie West Edinburgh).</p> <p>Proposals for Baird Road will not lead to an expansion of the city area. As the land is not in active agricultural use there will be no breach of the green belt objective of preserving prime agricultural land.</p> <p>The proposals therefore fulfil the objectives of criteria (a), (c) and (d) of SDP Policy 12. They also comply with the criteria in SESplan Policy 7 in that they will be in keeping with the character of the local area and will not undermine the green belt/countryside objectives.</p> <p>Proposals have been carefully designed to draw upon the existing developments in the area, residential developments in terms of height and form; scale; layout, materials and detailing and have followed the design principles outlined in the Edinburgh Design Guidance. In combination with housing land supply, it is submitted that there are grounds for allocating land for development contrary to Policy Env 10 of the LDP.</p> <p>Development at Ratho is therefore strongly in conformity with Choice 1.</p>
<i>2. Improving the quality, density and accessibility of development.</i>	<p>The underlying aims of Choice 2 are agreed. A more consistent approach to design, layout and accessibility is welcomed in relation to Baird Road, Ratho.</p> <p>Delivering this aspiration will be difficult if a purely brownfield housing land approach is adopted. Smaller city centre brownfield sites would be restricted in developable area once open space and car parking requirements are met. A</p>

	<p>blended approach towards housing land is therefore needed to ensure that sufficient land is available to meet housing needs.</p> <p>Development at Ratho will respond to climate change, accessibility for all ages and mobility needs. The village is under considerable development pressure and this remains the best option for the allocation of land in this location.</p> <p>The layout for Baird Road is revised to reflect City Plan 2030 objectives and SPP objectives regarding streets and high-quality layouts. The Masterplan also delivers high quality useable open space and would stand up well to scrutiny on the basis of more rigorous policy standards.</p> <p>It therefore strongly complies with the objectives of the MIR.</p>
<i>3.Delivering Carbon Neutral Buildings</i>	Buildings at Baird Road can meet the zero carbon /platinum standards as set out in the Scottish Building Regulations (50% carbon reduction).
<i>4.Creating Place Briefs and Local Place Plans in our communities.</i>	<p>The landowners are prepared to involve the local community in preparation of a Place Brief to guide development standards and quality. Indeed, discussions have previously taken place with the Community Council.</p> <p>The existing layout plan is a starting point for this Place Brief.</p>
<i>A city where you don't need to own a car to move around.</i>	
<i>5.Delivering Community Infrastructure</i>	<p>The availability of education and health facilities have been considered as part of the previous applications relating to the site. It is intended make appropriate health and education contributions in line with the Council's Supplementary Guidance.</p> <p>The Council has aspirations for a new West Edinburgh High School. This would be within the Ratho catchment area and would provide for housing development at this site.</p> <p>The development would comply with the terms of Policy Del 1 and Scottish Government Guidance on planning obligations. Criteria within Policy 7 of SESplan 2013 and Policy Hou1 on the provision of infrastructure in relation to the release of greenfield housing sites can therefore be met.</p> <p>The site is well located in terms of access to public transport and active travel in line with the City Mobility Plan. The A8 Newbridge corridor is identified as a preferred corridor within the Sustainable Travel Study.</p>
<i>6.Creating Places that focus on people and not cars</i>	<p>It should be noted that the Housing Study assessment table for Arbor Lodge is wholly inaccurate when considering Active Travel and Public Transport assessment criteria.</p> <p>The site is located adjacent to a bus route (Service 20) and bus stops are within 300m of the site.</p> <p>The site is within walking distance to Ratho Station industrial estate and employment cluster (1.5km).</p> <p>The site is within walking distance to local convenience services.</p> <p>The Local Path network lies directly to the north and south of the site (Wilkie's Basin to Ratho, and Hillend to Ratho Hall paths).</p> <p>The Union Canal Core Path and National Cycle Route lies 450m to the south of the site.</p> <p>The site is well positioned to maximise development in accordance with the City Mobility Plan and the Sustainable Transport Strategy.</p> <p>The nearby A8 is identified as a strategic transport link and can serve development in a sustainable and integrated manner. This includes access to Park and Ride facilities.</p>

	<p>The site is compliant with the walkable neighbourhood principles contained within Designing Streets. Existing amenities and employment clusters are well within the recommended maximum walking distance of 1,600m as detailed in PAN 75.</p>
<p><i>7.Supporting the reduction of car use in Edinburgh.</i></p>	<p>As a site on the urban edge adjacent to a public transport corridor, development at Baird Road will support the City Mobility Plan and restrict demand for vehicular movement in and out of the city. Development could contribute to public transport and car club initiatives as well as electric car charging points.</p> <p>The site scores highly when considering Active Travel (see Objective 6 above).</p> <p>Currently Policies 7 of SESplan 2013 and LDP Policy Hou 1 require developments to provide appropriate infrastructure. This is supplemented by Policy Del 1 Developer Contributions and Infrastructure Delivery. All relevant infrastructure can be provided.</p> <p>The site is accessible by a range of transport modes and located within walking distance of local services and employment cluster.</p>
<p><i>8.Delivering new walking and cycling routes</i></p>	<p>Development at Baird Road would directly contribute to this MIR objective and facilitate the preferred choice.</p> <p>Development would also provide an opportunity for enhancement of walking and cycling routes linking into the Union Canal and wider footpath network between Edinburgh and West Lothian.</p>
<p><i>A city in which everyone lives in a home in which they can afford.</i></p>	
<p><i>9.Protecting against the loss of Edinburgh's homes to other uses.</i></p>	<p>It is acknowledged that the existing housing stock within the city is under pressure from alternative uses such as short term lets. However, this is also because the supply of new houses is artificially constrained by the available and effective land supply and reliance on brownfield and windfall sites.</p> <p>This issue needs to be seen in the context of the overall requirement and demand for housing in the city from all sources, including visitors and students as well as specialist housing types.</p> <p>We are therefore not in agreement with the Council's estimates in terms of requirement to 2030 as this would provide for a gross undersupply of sites for the city. We are therefore in support of a blended approach to housing land supply for development.</p> <p>Land around Baird Road can contribute to this choice.</p>
<p><i>10.Creating Sustainable Communities</i></p>	<p>Ratho is a sustainable community which is subject to significant development pressures. Managed development of the settlement can assist in improving its vibrancy and sustainability.</p> <p>The desire to increase the number of new homes built in Edinburgh is welcomed and supported by the proposed development at Baird Road. The simple assumption that using 'the limited space in our city to ensure the creation of sustainable communities' is not accepted or evidenced in any way by the Monitoring Report.</p> <p>This issue also needs to be seen in the context of the overall requirement and demand for housing in the city from all sources. However, the Council's estimates in terms of requirement to 2030 would provide for an undersupply of sites. We are therefore in support of a more blended approach to housing development.</p> <p>The simplest way of relieving pressure and providing choice will be to increase the stock of available housing in order to meet projected household and student numbers in the city. Ratho is an appropriate location for residential family accommodation, relieving pressure on stock elsewhere in the city and allows re-locations and flexibility in the market.</p>

<p><i>11. Delivering more affordable homes.</i></p>	<p>The Council's aspirations to provide 20,000 new affordable dwellings in the city up to 2030 is noted and supported.</p> <p>Increasing the Affordable Housing quota to 35% essentially requires a ratio of affordable to market housing of 1:2 rather than the current 1:3. This has implications for viability and delivery, particularly given the reliance on more difficult and costly brownfield sites.</p> <p>The Council's approved Strategic Housing Investment Plan (SHIP) 2020-2025 for submission to the Scottish Government highlights the significant challenges associated with fulfilling the Council's commitment to deliver 20,000 affordable homes over the next 10 years, including securing both land and finance.</p> <p>The new LDP requires to address the shortfall in supply, particularly given the need to deliver in the region of 2,000 affordable homes every year in accordance with the SHIP programme. The SESplan 2 examination acknowledged that new land would require to be released to meet the demand for affordable housing.</p> <p>Delivery of this quantum of development will require more land to be identified in locations such as Baird Road. In order to meet the 35% affordable housing objective, the Council will need to take a more realistic and flexible policy approach to allocation as part of a blended housing land.</p>
<p><i>12. Building our new homes and infrastructure</i></p>	<p>We are not in agreement with this section of the Main Issues Report or the preferred approach being taken by the Council, which discriminates against locations such as Ratho.</p> <p>There is no strategic guidance and the Council's Housing and Transport studies are currently considered to be unsuitable evidence bases for determining these issues.</p> <p>The proposal to base City Plan 2030 on targets within SDP1 and HNDA2 is therefore open to question and interpretation, for reasons as set out in the MIR itself.</p> <p>On this basis, and in addition to 20,800 affordable houses, the market housing target is 22,600 units. This is a gross underestimate over the plan period.</p> <p>Regarding delivery, the City Council considers that there is currently sufficient land for 47,000 houses. Of this 9,200 has no consent and 16,900 is brownfield or windfall supply. It is not considered that this constitutes a robust or generous supply.</p> <p>The Council's Housing Study is sub divided into two parts which are internally inconsistent and do not relate to equivalent sub-divisions or sectors in the city. In terms of brownfield analysis there are 23 Assessment Areas, none corresponding to Ratho. Two large sites on Baird Road are identified on the Council's derelict and vacant land register but do not feature in the Council's assessment.</p> <p>The brownfield Urban Area Site Assessment identifies 142 sites with development potential and a notional density capacity of 16,900-27,000 units. Based on Figure 4 Estimated Site Capacities, this is considered a gross overestimate of urban brownfield capacity and underestimates the difficulties of delivering such land.</p> <p>The assessment of potential housing land sites is not competent and not properly considered.</p> <p>Regarding greenfield housing land the methodology is 'partially based' on Strategic Development Areas without justification for their continued existence, as opposed to development corridors. It is also undertaken in the absence of information from the Council's emerging West Edinburgh Study.</p>

	<p>Ratho is considered under Sector 6 which also covers the preferred East Riccarton site which is also outwith the SDA. West Edinburgh is Sector 1 which is only one of two sectors based on SDAs.</p> <p>The evaluation methodology is considered to be flawed and inconsistent, both in its content and detail. Accordingly, we have re-assessed the and re-evaluated the merits of the Baird Road site. RFA has produced an alternative and more accurate and informed scoring for the site, as presented in Appendix 1.</p> <p>The Sustainable Transport Study identifies Newbridge and the A8 as a Priority Transit Corridor. This emphasises the potential for releasing development sites through the LDP.</p>
A city where everyone shares in its economic success	
<i>13.Supporting Inclusive growth innovation universities and culture</i>	<p>Noted as part of the ongoing Economic Development Strategy.</p> <p>The preferred strategy choice however is opaque and refers to Choice 14 which relates to the West Edinburgh Study. This is not yet available so it is not possible to fully comment.</p>
<i>14.Delivering West Edinburgh</i>	<p>We support the delivery of West Edinburgh as a national priority and believe that the Baird Road site can contribute to this strategy. However, absolute adherence to the Strategic Development Area boundary is not agreed as a spatial approach.</p> <p>West Edinburgh is a fundamental element of the City's Economic Development Strategy. The MIR refers to the West Edinburgh Study but choices have been made without any findings of this Study being available for scrutiny as part of the LDP Choices Report.</p> <p>Baird Road is well placed for the A8 corridor and West Edinburgh identified as a strategic and sustainable public transport corridor. It is also well placed to enhance the City Deal offer in this part of the city.</p>
<i>15.Protecting City Centre Town and Local Centres</i>	<p>We have had regard to the Commercial Needs Study and this choice is noted.</p> <p>Development at Baird Road offers the opportunity of enhanced community infrastructure and facilities allowing local convenience facilities in Ratho within easy distance of a walkable location.</p>
<i>16.Delivering Office Business and Industry Floorspace</i>	<p>The existing industrial use for this site is obsolete. Having had regard to the Commercial and Industrial Needs Studies, it is clear that Baird Road is not feasible or viable as a marketable employment site.</p> <p>There is no proposal to retain any class 4, 5 or 6 use on the land and the owners are seeking a change of use to residential.</p>

1.28 It can be clearly seen that a masterplanned development of Baird Road helps achieve the objectives in relevant Choices and complies with the underlying objectives being pursued by the City Council.

Effectiveness and Sustainability

1.29 Guidance on the assessment of sites, in terms of deeming their 'effectiveness', is contained within Planning Advice Note (PAN) 2/2010 'Affordable Housing and Housing Land Audits' (Scottish Government, 2010). This is critical factor locally in West Edinburgh and in relation to the uncertainty of a proportion of the city's land supply.

1.30 Baird Road Ratho is effective or capable of becoming effective in the immediate 5-year period of City Plan 2030. An Effectiveness Matrix is set out below to demonstrate the effectiveness and consequently the likelihood of deliverability and implementation of the Ratho site for residential-led development.

Effectiveness Matrix

PAN Criteria	Evaluation and Comment
i. Ownership	The Site is wholly owned by a single landowner. The site is capable of being promoted by a developer and released for development by house-builders subject to an allocation and/or planning permission being granted.
ii Physical Conditions	<p>There are no known constraints on the land that would preclude development as proposed.</p> <p>It is understood that the Site conditions are suitable for construction. In relation to technical matters;</p> <ul style="list-style-type: none"> • Access and egress can be achieved on to the existing adopted road network at an improved junction in accordance with local highway standards. • There would be no flood risk from the development, the proposals can be drained and that the Sustainable Urban Drainage System (SUDS) strategy would not affect adjacent housing. Surface water run-off would be restricted to a maximum of green field run-off by attenuation to avoid discharging additional surface water. • A Drainage Impact Assessment (DIA) will likely be required at the full planning stage. • Any potential contamination can easily be identified and any remediation measures will be minimal and easily achievable. • No other abnormal costs exist and the development is able to fully fund the cost of infrastructure as part of the development programme.
iii. Contamination	<p>The previous use of the site was for a concrete batching plant. There is no evidence of serious contamination that would preclude its marketability for residential use.</p> <p>Any potential contamination can easily be identified and any remediation measures will be minimal and easily achievable.</p>
iv. Deficit Funding	<p>There is no requirement for public funding to make the residential development financially viable.</p> <p>Private housing development will contribute to affordable housing and developer contributions towards educational and transport infrastructure improvements where necessary.</p> <p>The development of all land and supporting infrastructure will be privately led.</p>
v. Marketability	The site would be available for marketing following the granting of planning permission and is very likely to attract strong interest from house builders.

	The site would form part of the 5 year land supply and also contribute to the overall housing requirement therefore reducing any current or emerging deficit for market and affordable housing.
vi. Infrastructure	<p>There are no known infrastructure constraints and the site can be adequately serviced from Baird Road, Ratho.</p> <ul style="list-style-type: none"> • Surface water run-off is limited to Greenfield discharge. A SUDS strategy will be developed and will likely include two levels of treatment for roads, porous paving and an attenuation basin. • Drainage provision will be made in conjunction with Scottish Water following a Drainage Impact Assessment to determine capacity and any downstream re-enforcement. • A full Development Impact Assessment for the Foul Water discharge and Water Impact Assessment will be required at the appropriate time.
vii. Land Use	<p>Housing is the sole preferred use of the land.</p> <p>In addition to the housing the development will likely provide for;</p> <ul style="list-style-type: none"> • Structural landscaping and green corridors; • Open space and play areas; and • Pedestrian footpaths and cycle paths.

Sustainability Matrix

1.31 Given the importance of sustainability placed within the LDP we have represented the Sustainability Matrix presented to CEC in support of the aforementioned planning application. Unlike the rather random evaluation criteria used by CEC, this references directly to Scottish Government Sustainability Principles as derived from SPP (Paragraph 29).

Sustainability Principle	Development Proposal Compliance
giving due weight to net economic benefit;	There will be significant net economic benefit through a number of mechanisms such as developer contributions towards education and affordable housing; Council revenue from new Council Tax receipts; increased local population to support the local facilities within Ratho.
responding to economic issues, challenges and opportunities, as outlined in local economic strategies;	The proposals respond to both national and local strategies relating to the provision of housing, and in particular the provision of a mix and choice of housing.
supporting good design and the six qualities of successful places;	This proposal presents a perfect opportunity for the developer and Council to work together through the detailed design stages to promote and showcase good design and qualities of place.
making efficient use of existing capacities of land, buildings and infrastructure including supporting town centre and regeneration priorities;	The scheme is proposed on previously developed and therefore brownfield land. The proposals will be supported by existing infrastructure.

supporting delivery of accessible housing, business, retailing and leisure development;	Supports the housing strategy and will comply with affordable housing Policy H7. The site is in one of the most well connected locations within Edinburgh with a significant choice of public and sustainable transport travel options.
supporting delivery of infrastructure, for example transport, education, energy, digital and water;	It provides much needed housing and will provide all necessary site infrastructure to support its operation. Developer contributions may apply.
supporting climate change mitigation and adaptation including taking account of flood risk;	Flood risk will be assessed in detail and any appropriate mitigation (in agreement with SEPA) will be proposed.
improving health and well-being by offering opportunities for social interaction and physical activity, including sport and recreation;	The site is located within close proximity to both the Local and the Core Path Network. Opportunity exists to link the development directly to these networks.
having regard to the principles for sustainable land use set out in the Land Use Strategy;	The scheme is proposed on previously developed and therefore brownfield land.
protecting, enhancing and promoting access to cultural heritage, including the historic environment;	The proposals do not impact on any existing access privileges or routes and have no impact on existing cultural heritage features.
protecting, enhancing and promoting access to natural heritage, including green infrastructure, landscape and the wider environment;	Proposals for new green space and landscaping within the design will comply with standards. The site is located close to the Local and Core Path Network. The proposals do not impact on any existing routes which afford access to greenspace and natural heritage.
reducing waste, facilitating its management and promoting resource recovery;	Recycling and refuse facilities will be incorporated into the design and collection of waste will be undertaken in line with local authority procedures.
avoiding over-development, protecting the amenity of new and existing development and considering the implications of development for water, air and soil quality.	The development sits upon previously developed land. The impact of the development will be controlled through the careful design, siting and use of finishes. This will be enforced through planning conditions.

- 1.32 Of particular importance are the obvious cross references to the aims and objectives of the LDP Choices Report. Fundamentally, the site makes the best use of existing land and infrastructure. The landscape setting of the city would not be compromised, and indeed active transport links would be enhanced linking into other parts of West Edinburgh.

Conclusion and Recommendation

- 1.33 We do not believe that the Council's preferred strategy of relying on brownfield sites to meet the

housing requirement is feasible or realistic in meeting demographic pressures. Furthermore, CEC's planning for housing has taken place within a strategic policy vacuum and without adequate assessment of possible brownfield and greenfield housing sites.

- 1.34 A Blended Approach to housing land allocations is needed and ALL brownfield sites, including this one at Baird Road, should be included as development sites in the LDP.
- 1.35 In terms of options for housing the Council has not carried out a detailed or comprehensive site assessment of all potential housing sites, such as Baird Road. The brownfield land at Baird Road has not been properly assessed by CEC, nor has the wider site at 'Arbor Lodge'. The Greenfield Site Assessment for Arbor Lodge must be revisited by CEC and particular attention paid to the existing attributes, particularly in relation to active travel, public transport linkages and proximity to convenience services and employment clusters.
- 1.36 Scottish Planning Policy seek to make the best use of land and allocating this site for housing development would focus on that principle.

Appendix 1 – Assessment Tables

Introduction

This Appendix of the representation provides the City of Edinburgh Council with a balanced and informed assessment of the Baird Road site in terms of its characteristics and acceptability for development. The appraisal is informed by detailed surveys, consultee comments and opinions, many of which are a result of the preparation and determination of planning application ref 16/02736/PPP for the site.

The Baird Road site makes up a portion of the 'Arbor Lodge' area of assessment. CEC has presented a site assessment of Arbor Lodge in the preparation of the Choices document. Those considered in this reassessment are as follows and are discussed in turn further below.

- Landscape and Visual Assessment. Sector 4 LCA 7 - Arbor Lodge (p30-31).
- Edinburgh Strategic Sustainable Transport Study - Phase 1. Table 5.2 and 5.3.
- Housing Study. Greenfield Site Assessment: Arbor Lodge (page 184).

Landscape and Visual Assessment

The Council's assessment is provided below in Table A1 for reference.

Table A1 - Extract from Council Assessment

Assessment and conclusions on scope for development
<p>CAA 7 forms part of the distinctive series of ridges and hills which arc around Ratho to the north and west. The steep southern face of this ridge is a prominent feature, seen from the historic core of Ratho and from the Union Canal. Although some dispersed housing is present on the lower eastern part of this face, steeper slopes are well wooded and are an important component of the setting of Ratho. This part of the ridge lies within an SLA and there is no scope for development on these steep south-facing slopes.</p> <p>The scarp grades more gently to the north where it is bounded by the M8, which is in cutting. An industrial facility is located in a dip close to the motorway. This area lies away from Ratho, which has a strong linear form and association with the Union Canal. While housing on this northern part of CAA 7 would be perceptually divorced from Ratho and conflict with the existing settlement form, it would lie physically close to its core. Some dispersed housing is visible on the perimeter of this CAA. This northern part of CAA 7 is visually discrete and the landform, surrounding roads and ridge top woodland would provide firm boundaries. Although some conflicts could occur with settlement pattern, there is some limited scope to accommodate housing on the lower slopes and flatter ground of this part of CAA 7. Woodland should be planted on steeper upper slopes to enhance the ridgeline. Earth bunding and planting along the M8 may also mitigate traffic noise and pollution.</p>

The Baird Road site is described in the assessment above as "an industrial facility". The site is

clearly not an active industrial facility, rather a brownfield and vacant site in need of redevelopment.

We agree with the Council's assessment and conclusion that "*there is **some limited scope** to accommodate housing on the lower slopes and flatter ground of this part of CAA 7*". This is precisely where the Baird Road site is located.

Edinburgh Strategic Sustainable Transport Study

The Baird Road site lies 1.5km to the south of the A8/Newbridge Corridor. This corridor is identified as one of only 2 where significant improvements can be made to facilitate future development in the area.

The Study states that the corridor presents an opportunity to support the sustainable development of key sites, and would provide for further opportunity for new sites to be developed south of the A8.

Works would improve public transport connectivity between the Strategic Development Area, the rest of West Edinburgh and the city centre. Clearly, any improvement to this transit corridor would benefit Ratho as a whole, given its proximity.

Housing Study

Assessment Sites were assessed against defined criteria based on SDP1 spatial strategy and policies, National Planning Framework developments and Scottish Planning Policy. Figure 1 of the Housing Study sets out the criteria, the policy background for each of the criteria, and the methodology and sources used to determine the criteria.

The site makes up a portion of the 'Arbor Lodge' area of assessment. The Council's Housing Study assessment is presented below in Table A2 below.

Table A2 – CEC Greenfield Site Assessment

SDP1 SDA AREAS	
<i>Does the site fit within an area identified as a strategic development area?</i>	No – The site is not within an identified SDA.
ACTIVE TRAVEL	
<i>Does the site support travel by foot to identified convenience services?</i>	Yes – The site is within walking distance of local convenience services.
<i>Does the site support travel by foot to identified employment clusters?</i>	No – The site is not within walking distance to employment clusters. It is unlikely that access can be improved and employment clusters are unlikely to be provided on the site due to lack of scope for development nearby.
<i>Does the site have access to the wider cycle network?</i>	No – The site does have access to the wider cycle network but access is impeded by the Union Canal cycle path which is considered at capacity. Access is unlikely to be improved as capacity cannot be improved here and no other suitable potential cycle route interventions have been identified which could serve the site.
<i>Can the site support active travel overall through appropriate intervention?</i>	No – The site would not support active travel overall, as the site is not within walking distance of employment clusters and these are unlikely to be provided through development due to lack of scope for development nearby. Access to the wider cycle network is poor and it is unlikely to be improved through an identified intervention.
PUBLIC TRANSPORT	
<i>Does the site support travel by public transport through existing public transport network accessibility and capacity?</i>	No – The site does not support travel by public transport based on existing or incrementally improved provision.
<i>Is the site potentially served by an identified public transport intervention project which is deliverable in the plan period to serve and accommodate development?</i>	No – The site does not support travel by public transport based on an identified intervention.
COMMUNITY INFRASTRUCTURE	
<i>Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?</i>	No – The site does not have sufficient primary school infrastructure capacity.
<i>Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?</i>	No – The site does not have sufficient secondary school infrastructure capacity.
<i>If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?</i>	No – The site does not have sufficient community infrastructure capacity to support development and no appropriate intervention has been identified to address this. A new primary school would be required. A new secondary school would be required. A new secondary school in this area could help to address pressures on secondary school capacity from new housing already proposed within West Edinburgh. The Council's preference is to deliver new secondary schools with a capacity for 1200 pupils. If a new 1200 secondary school was delivered it could support a significant amount of additional housing development, but it would have to serve a wide catchment area so good active travel and transport links would be important. There is not enough scope for development on this and nearby sites to support this level of intervention.
LANDSCAPE CHARACTER	
<i>Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?</i>	Partially – Some limited scope for development is identified on the northern part of the site where it is more visually discrete and surrounding roads and ridgetop woodland would provide firm boundaries, despite some conflict with the linear settlement pattern of Ratho. The rest of the site, incorporating the ridge and south-facing slopes are an important well-wooded component of the settlement of Ratho.
GREEN NETWORK	
<i>Would development of the site avoid significant loss of landscape-scale land identified as being of existing or potential value for the strategic green network?</i>	Partially – The site may be considered of value for the strategic green network, due to lying adjacent to an area identified as a green network opportunity related to Ratho and the Union Canal.
FLOOD RISK	
<i>Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?</i>	Yes – The site has no SEPA-identified areas of medium-high flood risk/for flood management.
SUMMARY COMMENTS	
<i>Is the site suitable for development?</i> No The site is not suitable for development due to its poor accessibility and community infrastructure capacity.	

The Site is appraised by the promoter below against CEC's own criteria and also SPP to assess its appropriateness as a preferred allocated site for housing led development. Given the promoter's knowledge of the site and background information available it can be demonstrated that none of the assessment categories warrant a 'No'/red scoring.

Table A3 – Promoter’s Greenfield Site Assessment (for Baird Road site)

SDP1 SDA AREAS		
Does the site fit within an area identified as a strategic development area?		Not Relevant or appropriate to this LDP review
ACTIVE TRAVEL		
Does the site support travel by foot to identified convenience services?		Yes The site is within walking distance of local convenience services
Does the site support travel by foot to identified employment clusters?		Yes The site is within walking distance to Ratho Station industrial estate and employment cluster (1.5km). Two route options are available.
Does the site have access to the wider cycle network?		Yes As identified by CEC, it has access to the wider cycle network. CEC suggests the site is marked down because the Union Canal cycle path “is considered at capacity”?
Can the site support active travel overall through appropriate intervention?		Yes The site is located adjacent to a bus route (Service 20) and bus stops are within 300m of the site. The site is within walking distance to Ratho Station industrial estate and employment cluster (1.5km). The site is within walking distance to local convenience services. The Local Path network lies directly to the north and south of the site (Wilkie Basin to Ratho, and Hillend to Ratho Hall paths). The Union Canal Core Path and National Cycle Route lies 450m to the south of the site.
PUBLIC TRANSPORT		
Does the site support travel by public transport through existing public transport network accessibility and capacity?		Yes The site is located adjacent to a bus route (Service 20) and bus stops are within 300m of the site.
Is the site potentially served by an identified public transport intervention project which is deliverable in the plan period to serve and accommodate development?		Partially The A8/Newbridge corridor is only 1.5km north of the site. This corridor is identified as one of only 2 where significant improvements can be made to facilitate future development in the area.
COMMUNITY INFRASTRUCTURE		
Does the site have sufficient primary school infrastructure capacity to accommodate the		Partially Capacity and catchment areas for Ratho or Hillwood Primary school to be investigated.

development without further intervention?		
Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?		<p><i>Partially</i></p> <p><i>This depends on the outcome in relation to CEC's plans for a new West Edinburgh Secondary School and catchment alterations.</i></p>
If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?		<p>Yes</p> <p><i>To be explored with CEC.</i></p>
LANDSCAPE CHARACTER		
Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?		<p>Yes</p> <p><i>CEC agrees there is "some limited scope to accommodate housing on the lower slopes and flatter ground of this part of CAA 7". This is precisely where the Baird Road site is located.</i></p>
GREEN NETWORK		
Would development of the site avoid significant loss of landscape-scale land identified as being of existing or potential value for the strategic green network?		<p>Yes</p> <p><i>The site is not identified within the SDP as an opportunity area. The site is not of high quality landscape or recreational value at present and is not accessible to the public. It does not form part of the green belt, which lies further to the east. Provision of managed green spaces and footpaths are to be incorporated into any development proposals to open up the site to the public and to improve this for biodiversity.</i></p>
FLOOD RISK.		
Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?		<p>Yes</p> <p><i>The site has no SEPA-identified areas of medium to high flood risk/for flood management.</i></p>
SUMMARY COMMENTS		
Is the site suitable for development?		<p>Yes</p> <p><i>The site has much better public transport accessibility and Active Travel attributes than recorded within the CEC Housing Study assessment table. Particularly, it is within walking distance of convenience services and employment clusters. The site is brownfield in nature and the Council's Landscape Assessment identifies the site as having some limited potential for housing development. The main A8/Newbridge transit corridor is within 1.5km of the site.</i></p>

Summary

The site assessments conducted by CEC did not provide an informed evaluation of the Baird Road

or wider Arbor Lodge site. The Council's assessment process was not completely robust and was inconsistent, leading to erroneous value judgements that are vague and unsubstantiated by any reliable evidence.

With the benefit of recent surveys, consultation and planning application responses a much more balanced appraisal of the site and its development impacts can be made.

The Baird Road site represents a logical development opportunity in West Edinburgh. Due to the well informed design and layout of the Indicative Masterplan and due to the careful and considered scale, density and mixed of housing the development would fit neatly and sustainably into the landscape and an overall positive environmental benefit would be afforded as a result of development.

Appendix 2 – Baird Road Masterplan





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