

Customer Ref: 00844      Response Ref: ANON-KU2U-GPQ9-8  
Name: John Wright  
Response Type: Agent / Consultant  
On behalf of: BDW Trading Limited (Barratt East Scotland)

Supporting Info:

Email:

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**  
We agree, in principle, with the aspiration to connect our places as part of a city-wide, regional, and national green network. However, we do not believe that it is appropriate for new development to deliver this in isolation. Clarity is also required as to the responsibility for maintaining this network. Parts of the desired improvements represent existing deficiencies in the network which are required anyway, and whilst it is appropriate that new development contributes towards delivering these connections, they should not carry the full cost. Similarly, by requiring the development/developer to deliver these, brings in possible ransom situations which could frustrate, and even prevent, development from happening. Therefore, proportionate contributions should be sought, but delivery (particularly off site) should be by the Council (utilising statutory powers, where required). Map 1 showing the existing active travel network is incorrect (at least in one location – CEC11 confirmed by the Core Path Plan) as it shows the River Almond Walkway as being complete between Kirkliston and Crammond, and it would be worth ensuring that the plan is correct. In a similar vein (in respect of the River Almond Walkway), there seems little point investing funds and delivering an active travel route within an area identified on the Proposals Map as being within a flood plain and an area identified for airport expansion. There may be other examples of this which would be worth checking before progressing the plan to adoption. Cross referencing our submission at Choice 12B there are opportunities at Ratho where delivery could be assisted by new development.

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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 BDW support this in principle however raise issues (in their response) that require to be addressed in the detail of how this will be achieved, and how it could impact on the achievability of other elements of the plan. However, it will not be possible for “all development” to deliver this, particularly for surface water (Blue Infrastructure) within the vicinity of Edinburgh Airport (no open water allowed). Therefore, further thought on the types, scales, and locations of development that this requirement is applicable to prior to progressing the plan towards adoption.

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 BDW support this aspiration in principle however prior agreement with the landowner is required, and there may be compensation necessary. If areas are to be identified on the plan for future water management, this will have an impact on the agricultural operations being undertaken and discussions with the landowner will be required prior to identifying areas, and to agree compensation for lost crops etc.

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 BDW support this, in principle, but require further detail to be able to comment further.

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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** No issue with the aspiration, but further detail is required on the scale of development that this will be imposed on. This will only be achievable on very large sites (likely greenfield and there are not many identified in the plan) and there will be unintended impacts on the ability to achieve the density aspirations, and the numbers achievable on site. 5ha (12 acres) is very significant area, and we would support the continuation (in certain circumstances) of the 2ha requirement, but for this to be identified as a minimum to be provided at a certain scale, which is expected to be exceeded depending on the scale of development. It should be borne in mind (particularly considering Choice 1D) that it is not just the scale of the open space, but its usability and accessibility, that is the more important factor in this.

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** However, if the Council are to be identifying/allocating specific sites for new allotments and food growing, it is critical that they first consider their own ownership (including under used Open Space) before considering other locations. It is also critical that there is prior agreement with the owner (failing which the allocation will fail the tests of effectiveness set out in SPP) of the land to ensure that they are prepared to release it for that use, otherwise, there will be constrained allocations in the plan from the point of adoption. Where this is required as part of an allocation, it should be borne in mind that Allotments form part of the Open Space to be delivered on site (SPP definition of "Open Space" is "Space within and on the edge of settlements comprising green infrastructure and/or civic areas such as squares, market places and other paved or hard landscaped areas with a civic function" and "Green Infrastructure" is defined as "Green features include parks, woodlands, trees, play spaces, allotments, community growing spaces, outdoor sports facilities, churchyards and cemeteries, swales, hedges, verges and gardens").

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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? - 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  
However, as with Allotments, if the Council are to be identifying specific sites for new Cemetery or green/woodland burials, they should consider the Councils ownership (including underused Open Space) prior to engaging in discussion to reach agreement with a landowner. This is critical before including a site in the plan to avoid allocations in the plan which fail the tests of effectiveness set out in SPP.

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  
It is unclear from the detail provided what is going to change from the current arrangements where adoption (with long term maintenance provision) or factoring is required/provided.

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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** Design and Access Statements are a formal part of the process for certain scales of development (Major and National Development, or development within a World Heritage Site, a Conservation Area, Historic Gardens & Designed Landscapes, National Scenic Areas, the site of a Scheduled Ancient Monuments, the curtilage of an A Listed Building), and in certain locations, but are not required for all proposals. Requiring these for changes of use where there is no change to the external appearance, these buildings are present in the locality and should not need to re-justify their design for a simple change of use. Further detail is required prior to commenting further, but we would recommend maintaining the existing thresholds for triggering the requirement for a Design & Access Statement. These measures however implemented should only apply to applications submitted following adoption of the LDP and not before, or retrospectively to currently pending applications under determination.

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** BDW welcome the drive to maximise the efficient use of land, however, raise issues in their representation on this point that require to be addressed. We therefore suggest that minimum densities are replaced with requirements to demonstrate that development proposals offer the most efficient use of land taking into account site-specific technical considerations and local context. These measures (as with all other new measures, policies, requirements in this LDP) however implemented should only apply to applications submitted/registered following adoption of the LDP and not before, or retrospectively to currently pending applications under determination.

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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** Cross referencing our response to Choice 1A - National Policy in terms of SPP and Designing Streets already require this, there is no need to duplicate or further complicate this issue by arriving at a further Policy requirement. These measures however implemented should only apply to applications submitted following adoption of the LDP and not before, or retrospectively to currently pending applications under determination.

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** Whilst we agree with the statement, the detail in the Choices Document raises question marks over whether the aspiration is achievable “without losing densities” particularly within the urban area and on brownfield development sites. Student Housing should be treated no differently to private and affordable housing, delivering the same amount of open space as mainstream housing. Along with the other aspirations outlined in the Choices Document, it is important that the Council look at all of these in the round to arrive at a view of how this will affect delivery of development, in terms of timing and numbers, and ensure that this is reflected in the programming of sites in the supply to ensure the required minimum 5 year supply is maintained at all times. It is possible that, when reflected in the programming, this prompts a need for additional sites to be identified to maintain that supply and to avoid departure applications in response to a failing land supply that increases uncertainty for communities and the Council.

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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: Current Building S

**Explanation**      Cross referencing the response by BDW to this Choice, we would add that the Building Control function of the Council is there to implement the requirements of the Building Regulations and the Planning Process should not duplicate or stipulate the requirements to be achieved. This will add complexity in the determination of planning applications by requiring consultation with Building Control on the standard being achieved (which will require additional detail to be provided by the applicant, and considered by Officers), and will duplicate the specific role of the Building Control Officer.

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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: No

**Explanation**

If the Council are to be preparing Place Briefs (although it is unclear what the difference is between a Place Brief and a LPP) for areas and sites within City Plan 2030, they will need to await the Examination Report before proceeding with these to be certain what areas and sites they are to be working on to avoid aborted work, wasted resources and raised community expectations. In order to prepare a Place Brief (or LPP) it is critical that relevant landowners and developers are involved in the process. At that stage in the process it is likely there will be insufficient information available to arrive at a consensus on a Place Brief that won't change when the detailed site specific studies are undertaken (which can have a bearing on the layout and developable areas) and a detailed layout prepared. Assuming these are prepared following adoption of the LDP, the Council (working with the relevant stakeholders) would prepare the Place Brief (say 12 months); then community consultation could be undertaken on proposed Planning Application (min 3 months); a planning application could be progressed (current timeframe for determining a Major App (including S75) being approx. 9 months (35 weeks being 2019 Q1 and Q2 stats amalgamated); with discharge of pre-commencement conditions (assuming Full Planning, PPP would be longer), obtaining Building Warrant and other necessary consents prior to commencement of development (say 18 months). Therefore, if this is the case and assuming the anticipated timeframes are correct, the lead in time to delivering anything on site (assuming a running start at adoption of the plan) would be approx. 42 months (3.5 years) meaning that this needs to be reflected in the programming of sites allocated in the plan to establish whether a minimum 5 year supply is maintained at all times. If this is the case, and this approach is followed, it would be justifiable to identify additional generosity to the supply, and identify in excess of the minimum 5 year requirement prior to adopting the Plan. It would also be helpful to have definitions provided as to what the various terms used in the consultation mean such as "Community Body" (particularly where there is no Community Council); "Community Ambitions" (is this a majority of the community, if so, how is the community defined, is there a vote held locally or is this simply the ambitions of the vocal minority?); "Community Infrastructure"; "Community Facilities"; "Community Services"; "Community Uses" all of which are terminology used in the Choices Document. The planning system is designed to provide certainty and it is important that we all know the terms being used, understand their meaning, and how they are to be consistently applied, to provide that certainty. It also needs to be borne in mind that Healthcare is centrally funded, in parts a private enterprise, and whilst opportunities for Healthcare can be identified within a development, we do not believe that it is for the developer to deliver this. Fife Council recently (Dec 19) confirmed in a Committee Report (19/00250/FULL) that "Concerns raised regarding health care services and provision are noted, however, this is not an issue that can be addressed by the planning system. The NHS operate a list system which allocates a certain number of registered patients per GP. If a GP has too many patients registered, then funding is available for a new GP as part of that practice's business case to expand services where required to meet additional demand. The funding of healthcare is an issue for central government and there is no policy or legal mechanism in place for the planning system to require a developer to remedy this situation". We do not understand why this situation would be any different in Edinburgh. It is critical that the relevant landowners and developers are necessary participants in this process. Considerably more detail is required on how these will work to be able to comment further at this stage.



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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: Not Answered

**Explanation**

The Planning (Scotland) Act 2019 (new s15A) sets out the process (except for the further detail to be provided in Regulations) to be followed in relation to local place plans. Before preparing a local development plan, a planning authority are to publish “an invitation to local communities in their district to prepare local place plans in accordance with schedule 19” (s15A (a)). Was this invitation published prior to preparing the LDP? Alongside this published invitation, the local authority are to (s15A (b)) publish information on, “(i) the manner in which and date by which such local place plans are to be prepared in order to be taken in to account in the preparation of the local development plan”; and information on “(ii) the assistance available for local communities to prepare local place plans”. New Schedule 19 provides some of the detail (except for the further detail to be provided in Regulations) as to how these should be prepared. Whilst we don’t see how this would be possible in the absence of the Regulations, has this been done? If so, what are the dates by which these local place plans are expected to be in place by in order to be taken in to account in this local development plan? What support/resource has been offered and has this been accounted for in the Financial Assessment of the Plan? It was estimated in 2019 (Financial Memorandum) that a local place plan could cost in the region of £13,000 to prepare. This figure assumes that the planning authority’s role, including provision of information to communities, would not add any significant costs. Has the Council considered the number they anticipate being prepared and the associated resource implication and cost of these in the financial appraisal of the LDP process? Local place plans should have regard to the local development plan for the land, as well as the Scottish Government’s Strategic National Planning Framework (currently under review, not anticipated to receive Parliamentary approval until 2021 – Scot Gov website) which covers the whole of Scotland. As the Act does not indicate the content and scope of local place plans (to be prescribed by regulations), and at this stage in the process (assuming the relevant precursor steps haven’t been taken already), there seems little point in progressing/ability to progress these as they may fail to meet (when published) the requirements of a local place plan (and therefore unable to be submitted/registered (and in turn taken in to account in the local development plan process)) resulting in abortive costs to community groups little able to afford such costs. It is critical that communities are well informed about the constraints and opportunities of particular sites, and that the relevant landowners and developers are necessary participants in this process. Considerably more detail is required on how these will work to be able to comment further at this stage.

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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** Whilst we do not disagree with the thrust of this Choice, we understand that Healthcare provision is centrally funded, in parts private enterprises, and whilst opportunities for Healthcare provision can be identified within a development, or as an allocation, we do not believe that it is for the developer to deliver this (See our reference to Fife Council comments on this issue set out at 4a). It is essential that any contributions meet the tests of the Circular and are justifiable, reasonable and proportionate. In terms of the four transport corridors identified in the consultation, we believe that a fundamental arterial route in to Edinburgh (A90 from Fife) has been ignored in the consultation. There has been an increase in traffic approaching the City (due to Edinburgh displacing need and demand to Fife (and other Lothian authorities) in the last SDP/LDP, along with significant development, recent and proposed in this plan, at Kirkliston) and there are opportunities/proposals (such as a proposed Park & Ride at Craigiehall) which would fill an obvious gap in similar provision at nodes around the City (see Map 4).

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** Whilst we agree with this, we believe that clarity is required over the terms being used in the Consultation, consistency used in their application, and clarity over the responsibility for delivery of these features is required. Prior agreement with the landowner is also required to satisfy the tests of effectiveness set out in SPP to avoid constrained allocations in the plan, and potential unintended delays in delivering development, by not being able to bring forward the Community Facilities. It is also worth bearing in mind that some of these community facilities are already required, in part meet an existing deficiency, and therefore not wholly deliverable by contributions from new development.

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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** See our submission to 12B, we believe that there is an opportunity to achieve this at Ratho, and to improve public transport service in the locality for the benefit of existing residents.  
12B:We object to Calderwood, as this would appear to do be getting “bolted on” to a large scale strategic masterplanned development within West Lothian (has consultation been undertaken with West Lothian Council about this cross boundary proposal), it does not appear to satisfy the Councils aims of locating proposed new development in locations with infrastructure capacity, or where capacity can be provided. The Calderwood development is currently underway and the services and infrastructure being provided will not have capacity beyond the consented units, meaning that this extension will need to connect in to, and improve, recently installed infrastructure to service the land. This would also appear to form “linear development” which the Council have been critical of elsewhere, and would do little to reduce car-based travel into Edinburgh (it is unclear from the Calderwood plans where the nearest bus stops are, or where the facilities will be provided to know whether this would achieve the Councils targets on walking distance). We object to West Edinburgh for reasons highlighted elsewhere in our responses. We believe that the West Edinburgh study should have been undertaken prior to the LDP being prepared to inform it, rather than preparing it in tandem whilst promoting the significant opportunities within the area of search in this plan. We object to South East Edinburgh as parts of this area have been robustly resisted by the Council in the past, this will erode the only gap now remaining between Edinburgh/Midlothian/East Lothian Councils in this locality and in our view erodes the landscape setting of the City in a far more detrimental manner than other potential development sites being promoted.

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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 We don't disagree with this aim, subject to our comments elsewhere (at 5B) about the scope of these, the definitions (and consistency in use of them) used and clarity being provided on the responsibility for delivery.

5B: Whilst we agree with this, we believe that clarity is required over the terms being used in the Consultation, consistency used in their application, and clarity over the responsibility for delivery of these features is required. Prior agreement with the landowner is also required to satisfy the tests of effectiveness set out in SPP to avoid constrained allocations in the plan, and potential unintended delays in delivering development, by not being able to bring forward the Community Facilities. It is also worth bearing in mind that some of these community facilities are already required, in part meet an existing deficiency, and therefore not wholly deliverable by contributions from new development.

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 There are issues with the legality of this approach (Ref Elsieck, and the recent Chief Planners Letter regarding the Edinburgh SG on Developer Contributions and Infrastructure) and whilst a cumulative approach may be beneficial to the Council in considering what improvements might be required in the area, significantly more information is required before this can be robustly considered as being appropriate and what forms of development contributions will be sought from.

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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** We are unable to support this approach. Edinburgh Council has been applying their Developer Contributions Guidance (unadopted) for a number of years (and continue to do so, despite the Scottish Government resisting its adoption highlighting deficiencies which have not been addressed). When submitted to the Government for approval, the approval was not given, and the Guidance put to the side. This highlights the issues that the Development Industry, and Landowners, are wary of in respect of non-statutory guidance being used for critical issues such as this. If reduced to non-statutory guidance, there is no third-party consideration, and this cannot be allowed to happen with an element of the plan which can result in £m of contributions being paid to the Council. We need the confidence that this has been independently considered prior to adoption, and ONLY applied following adoption. It will not be possible to set out the precise amounts until the content of the plan is approved (otherwise, updates to the Contributions will be required prior to adopting the Plan to reflect changed allocations which could have a bearing on the amounts identified in the plan), therefore, we believe that the precise contributions should continue to be set out in Statutory Supplementary Guidance prepared following receipt of the Examination Reporters Report. We believe that there is also an issue with Action Programme also setting out costs and duplication/contradiction between the two documents. We do not believe that the Action Programme should contain anything other than the Actions required to deliver the plan, and the contributions should be contained in one document.

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** This is a highly subjective approach to considering the acceptability of development and relies on a variety of very broad ranging assumptions and interpretation thereof. We do not believe that this approach delivers the certainty required by the Planning System. New development can trigger enhancements (not planned), and in some cases new development subsidises enhancements to public transport in their early years, which would not be taken in to account in this process.

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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** The terms "Place Brief" and "Place Plan" are used in the Consultation, however, it is not clear what each does, and which is prepared first. If these are separate documents, prepared in sequence (which is what we understand would be the case), this will add to the resource required, and the timescale involved before development can proceed or sufficient certainty is available to be able to progress an application (see response at 4A). We do not believe that it is appropriate to identify in separate policy documents differing levels of parking provision and are of the view that these should still be dealt with in a separate piece of statutory supplementary guidance to provide the certainty required by the Planning System. Whilst we support the move towards public transport, this cannot be forced upon people, and in instances where minimum parking has been provided, problems have been experienced with people parking on verges/open space etc. It must be borne in mind that whilst the drive towards public transport is sensible, the current move is towards electric cars and therefore car ownership will remain prevalent and whilst the Council may decide to reduce their ability to park in the city or at their work, they should be able to park them at home.

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** Aspirational targets are not an appropriate basis on which to base the parking levels applicable to the new homes in this plan. If the targeted trips are not converted into actual trips, then there will be an under provision of parking which will result in undesired consequences. The number of people who will walk, cycle or use public transport is dictated by personal choice and this cannot be targeted, it is dictated by the attractiveness and availability/reliability of the transport modes being encouraged. People should not be left in a position where they have no choice but to use public transport, walk or cycle if they don't want to, or it isn't convenient for, the trip that they are making.

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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

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

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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: Yes

**Explanation** Whilst we agree with this approach, the Map (Map 4) published alongside this question indicates (bottom right) that what is shown on the Map is “Potential Park & Ride Sites”, but confuses new and existing provision (see also our response to 5A). When considering Map 4, it occurs to us that; •Ingliston P&R (shown on Map 4) is existing but potential to be extended; •Fermiston P&R (shown on Map 4) is existing but potential to be extended; •Straiton P&R (not shown on Map 4) is existing no change discussed; •Sherrifhall P&R (not shown on Map 4) is existing, no change discussed; •Newcraighall P&R (shown on Map 4) is existing but potential to be extended; •Gilmerton Rd (shown on Map 4) is potential new provision; •Passwade Rd (shown on Map 4) is potential new provision; There is an obvious gap in provision, when looking at the existing and proposed provision in the network, which is on the A90 at Craigiehall.

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: Yes

**Explanation** At 8A it is indicated that the Council are to provide criteria, but at 8C people are asked to propose links, how is this possible if the criteria haven’t been published. We also require clarity as to the responsibility for funding, delivery and maintenance of these routes before commenting further.



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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

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

Explanation We support the aspiration, however as indicated in various other responses to the consultation, clarity is required as to the responsibility for delivery, funding and maintenance of these routes, and the relevant landowners should be informed and consulted as part of the process of identifying these (some may require amendment to alignment to take account of existing farming, shooting etc activities).

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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

Explanation

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

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

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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** The amount of student housing coming forward is in response to the demand, quite simply, if the developers didn't believe there would be occupiers, they wouldn't be progressing schemes. It would appear to us, from press coverage of student housing proposals, that residents don't appear to like student housing being pepper potted amongst open market housing due to the likelihood of students and the working population keeping very different hours. The presence of the student population within the open market housing stock is one factor which pushes rents/market values of property upwards and prices out the local resident population (Marchmont for example) and therefore accommodating students in specifically designed accommodation and maximising the delivery of that in close proximity to the universities would appear to have beneficial effects which would not be achieved through the approach being advocated here.

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** As outlined at 10A, a Policy such as this is likely to be too prescriptive and difficult to apply in a wide range of circumstances, and should have regard to surrounding character, rather than dictate a range of uses to be delivered. The result of applying a policy such as this could result in conflicting uses being accommodated on site. A site of 0.25ha is very small indeed to attempt to deliver this range of uses, and insisting on this type of approach to urban sites within close proximity to educational establishments, will only reduce the ability of those sites to meet the demand in close proximity to the establishment they serve. The reasoning behind the proposed restriction on studio flats to 10% max on site is not clear, student accommodation is largely studio flats (which can be used out with term time as holiday accommodation during the festival etc.). Also, the planning process cannot dictate the ownership of student housing, this would appear to be imposing a cartel/monopoly on the student market which is not appropriate.

Customer Ref:  Response Ref:   
Name   
Response Type   
On behalf of:

Supporting Info   
Email

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

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

We support the position taken by Homes for Scotland and BDW Trading in their respective responses.

Customer Ref:  Response Ref:   
Name   
Response Type   
On behalf of:

Supporting Info   
Email

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** It is not possible at this stage in plan preparation to stipulate a mix of housing types and tenures which will be delivered on sites, some of which (given the timescales set out in our other responses) may be delivered towards the end of the LDP Period (therefore in approx. 4-7 years' time). This is highly fluid and should only be determined by market conditions at the time the proposal is being consented. This point is confirmed by the changes of house type applications by housebuilders on sites under construction to reflect changing market conditions. The design guide should be produced in conjunction with the developer and not lead by the RSL. We do not support the representative mix as we work with the RSL to meet their needs which is 1, 2 and 3 bed properties regardless of what is being built on the private site. The further down side to a representative mix is that densities would reduce as land take would increase for the affordable element and as a result both private and affordable numbers would reduce overall. Housing for Varying Needs standards is a wide term and we would only support the broad principles of this as all criteria cannot be met.

Choice **12 A**

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

Short Response

**Explanation** We support a Blended approach due to the need to deliver the urban/brownfield sites, however, it must be recognised that in doing so, a larger allowance for generosity is required due to the significant lead in times associated with delivering these sites, coupled with the question marks raised over the deliverability of these associated with some of the other Choices in the consultation, and the potential lead in times (where Place Briefs, Local Place Plans etc are involved). We believe that, as has been the approach in other Local Authorities (Midlothian for example), the Council should consider identifying "reserve" sites for delivery in the event of a failure in the land supply, these "reserve sites" (such as that promoted in Choice 12B at Ratho) could be the priority in the event of a failure in the land supply which would at least allow this to be met in a plan led manner, rather than a first come first served approach that currently exists. We support the position taken by Homes for Scotland in their response relating to the Housing Land Requirement/Housing Supply Target.

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

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

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

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

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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



Customer Ref: 00844      Response Ref: ANON-KU2U-GPQ9-8  
Name: John Wright  
Response Type: Agent / Consultant  
On behalf of: BDW Trading Limited (Barratt East Scotland)

Supporting Info:   
Email: johnwrightis@hotmail.com

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 Yes

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**  
We object to Calderwood, as this would appear to do be getting “bolted on” to a large scale strategic masterplanned development within West Lothian (has consultation been undertaken with West Lothian Council about this cross boundary proposal), it does not appear to satisfy the Councils aims of locating proposed new development in locations with infrastructure capacity, or where capacity can be provided. The Calderwood development is currently underway and the services and infrastructure being provided will not have capacity beyond the consented units, meaning that this extension will need to connect in to, and improve, recently installed infrastructure to service the land. This would also appear to form “linear development” which the Council have been critical of elsewhere, and would do little to reduce car-based travel into Edinburgh (it is unclear from the Calderwood plans where the nearest bus stops are, or where the facilities will be provided to know whether this would achieve the Councils targets on walking distance). We object to West Edinburgh for reasons highlighted elsewhere in our responses. We believe that the West Edinburgh study should have been undertaken prior to the LDP being prepared to inform it, rather than preparing it in tandem whilst promoting the significant opportunities within the area of search in this plan. We object to South East Edinburgh as parts of this area have been robustly resisted by the Council in the past, this will erode the only gap now remaining between Edinburgh/Midlothian/East Lothian Councils in this locality and in our view erodes the landscape setting of the City in a far more detrimental manner than other potential development sites being promoted.

Customer Ref:  Response Ref:

Supporting Info

Name

Email

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 C

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

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **12 D**

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

Short Response

Explanation

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

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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** There is a distinct lack of clarity over the West Edinburgh Study and more broadly the Area of Search identified for this. As a representative of landowners within and adjacent to the Study Area, we are disappointed to have not been contacted by anybody about this, despite attempting to contact someone in the Council (or the agents we understand have been appointed) to discuss this without success. We are unclear of the merit in considering future uses within West Edinburgh (without being site specific), when the vast majority of the study area is either currently allocated (or in the process of being brought forward) or is proposed to be allocated in this plan (for a range of uses) and thereafter delivered. In light of this, we believe that it would make more sense to identify a wider “area of search” from the Firth of Forth to the Pentlands, to properly consider West Edinburgh in its fullest sense, and to properly consider all opportunities in this area. Surely the West Edinburgh Study should have been completed in order to inform the LDP review, rather than (as it seems) in tandem to it. We would appreciate if someone from the study team could contact us to discuss this study to better understand what stage it is at, and what opportunity we have (as landowners in the area) to input to the process.

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** In order to properly consider this choice, we would appreciate confirmation that either Edinburgh Airport is no longer expanding in the way that it has previously been anticipated to (prompting the need to relocate RHS and in turn safeguard this land for that purpose), or that the RHS will never relocate from its current site. This land was safeguarded for RHS relocation (as it is the most logical site for it to relocate to), and if that is no longer happening, then the designation of the land (as anticipated in the Choices document) for housing, needs to be considered in the same manner as every other greenfield greenbelt release with no regard to the previous designation being taken in to account (i.e. not as an allocated site being changed, but a new green belt release).

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

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

Customer Ref: 00844

Response Ref: ANON-KU2U-GPQ9-8

Supporting Info

Name John Wright

Email johnwrightis@hotmail.com

Response Type Agent / Consultant

On behalf of: BDW Trading Limited (Barratt East Scotland)

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 Not Answered

Explanation Not Answered

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 Not Answered

Explanation Not Answered

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 Not Answered

Customer Ref: 00844      Response Ref: ANON-KU2U-GPQ9-8  
Name: John Wright  
Response Type: Agent / Consultant  
On behalf of: BDW Trading Limited (Barratt East Scotland)

Supporting Info:   
Email: johnwrightis@hotmail.com

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: Not Answered

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: Not Answered

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: Not Answered



Customer Ref:  Response Ref:   
Name   
Response Type   
On behalf of:

Supporting Info   
Email

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

Explanation

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

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Customer Ref: 00844

Response Ref: ANON-KU2U-GPQ9-8

Supporting Info

Name John Wright

Email johnwrightis@hotmail.com

Response Type Agent / Consultant

On behalf of: BDW Trading Limited (Barratt East Scotland)

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 Not Answered

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 Not Answered

Explanation

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 Not Answered

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

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

Explanation

**Customer Ref:**

00844

**Response Ref:**

ANON-KU2U-GPQ9-8

**Supporting Info**

**Name**

John Wright

**Email**

johnwrightis@hotmail.com

**Response Type**

Agent / Consultant

**On behalf of:**

BDW Trading Limited (Barratt East Scotland)

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## **RATHO, LAND AT FREELANDS ROAD**

Land at Freelands Road, Ratho (see enclosed Promotion Document & Masterplan) should be considered as a new greenfield allocation within this LDP with a short term allocation for approximately 150 to 200 homes, and a longer term safeguarding to the east considered for further land for future development in subsequent plan periods (these should be considered as separate entities and the fate of one not dependant on the other).

This land has a reasonably complex recent history which can be briefly summarised as follows;

- Promoted through LDP1 for an allocation, resisted by the Council and DPEA at Examination;
- Planning Application Ref: 15/05224/PPP refused by Committee April 2016;
- Planning Appeal Ref: PPA-230-2184 dismissed by DPEA October 2016;

Having reviewed those outcomes, and the associated reports and communications, the most recent expression of the outstanding issues to be resolved would be the refusal of Planning by Committee upheld by DPEA, there would appear to be the following issues to be overcome if the land is to be developed;

- Character of Ratho, and its landscape setting;
- Green Belt objectives;
- Prime Quality Agricultural Land;
- Accessibility to Public Transport and facilities.

There is significant quantity of information available to support this proposal (Visual Amenity Study; Transport Assessment; Environmental Assessment; Archaeology; Air Quality; Ecology; Design & Access Statement), in excess of the limit for uploading to the portal with this representation. All relevant information is available in the public domain to view on the planning portal (Ref: 15/05224/PPP) by following the below link;

<https://citydev-portal.edinburgh.gov.uk/idoxpa-web/applicationDetails.do?activeTab=documents&keyVal=NXRB9QEWJLV00>

Alternatively, we would be very happy to send this additional information separately if you could confirm the way you could receive it (wesendit/wetransfer) we can provide the full suite of information.

### **Accessibility to Public Transport and Services/Facilities**

The Council and the Reporter at Appeal commented on the extent to which Ratho is *“not particularly well served by public transport”*.

The Transport Assessment for this proposed development correctly interpreted PAN 75 – Planning for Transport, and whilst the recommended guidelines are *“less than 400m to bus services and up to 800m to rail services”* it goes on to state that *“Accessibility to local facilities by walking and cycling: – A maximum threshold of 1600m for walking is broadly in line with observed travel behaviour”*.

As part of the proposed development it should be possible to provide bus stops in closer proximity to the proposed site (i.e. North side of the Bridge) which would be a benefit to residents on part of the Moorings development site. Similarly, it would be possible for the development to subsidise an improved bus service to Ratho, it is therefore incorrect to infer that this proposed development *“offers no potential to improve accessibility”*. It is also possible, in conjunction with Norton Park (if it proceeds), and other proposed developments in the locality, to improve the bus network in the area

generally, and possibly consider a new route approaching Ratho from the north east over the M8. The other park and rides and rail halts are accessible by bus (or through subsidy could be), with cycle network adjacent to the site, providing non car alternatives to accessing the city.

It is worthwhile bearing in mind this point when assessing other sites proposed for allocation in this plan. The site at Norton Park will not have operational shops/facilities until there are enough residents to justify opening, therefore these residents will be considerably further from bus stops and local facilities than those at Ratho if allocated. Similarly, the site at Calderwood would appear to be outwith these distances from local facilities and services.

### **Green Belt Objectives**

Whilst this is relevant, it is interesting to see how the Council deal with this. In our view, there is a desperate need to properly review the Green Belt and identify only those areas which deliver the aims of the Green Belt in the long term (as expected of the green belt) should be identified as such. SPP is clear that *“for most settlements, a green belt is not necessary as other policies can provide an appropriate basis for directing development to the right locations”* (Para 48). The Councils approach to development in the Countryside is the same as its approach to development within the Green Belt, so there would appear no strong detriment to the Council in policy terms taking this approach. This could go some way to the 5 yearly picking apart of (or adding to) the Green Belt that occurs, and the issues that causes in preparing plans (particularly in respect of community views).

To reinforce this point, most of the recent developments at South Queensferry (South Scotstoun & Builleyon Road) which were only added to the Green Belt in 1999 (Edinburgh Green Belt Study 1999) to protect the landscape setting of Queensferry are now allocated, consented and under development.

Having said that, the main functions of the green belt are (SPP Para 49) to “support the spatial strategy by;

- directing development to the most appropriate locations and supporting regeneration;
- protecting and enhancing the character, landscape setting and identity of the settlement; and
- protecting and providing access to open space.

We are of the view that the Freelands Road site contributes towards achieving the spatial strategy (assuming a blended approach is adopted, it would be an appropriate location) and contributes little more to the green belt than any other greenfield, green belt, site under consideration through this LDP process does, and its re designation as a housing allocation would not prejudice the overall aims of the green belt, and in some cases (protecting and providing access to open space) would help deliver some of the aims of the green belt in this location.

Whilst we acknowledge the absence of a robust green belt boundary in existence, we are comfortable that one can be formed (as has been the case elsewhere in Edinburgh with other allocations – Burdiehouse for example – where 30m tree belts were sought). Therefore, we are comfortable that a robust green belt boundary can be formed associated with the short-term allocation being sought and in the longer term should the reserve allocation be considered appropriate.

The longer-term safeguard being sought, is to assist the Council in defending from departure applications in the event of a failure in the land supply. Midlothian Council has identified “reserve” allocations which their policy in the event of a failure, directs developers to before considering unallocated land. This approach would appear to achieve a plan led system and have considerable



merit by delivering the certainty (to the Council, Communities, and the development industry) expected of the Planning system.

### **Prime Quality Agricultural Land (PQAL)**

Whilst the land is identified as Grade 2 (Hutton Institute Mapping), this is not an impediment to allocating the site in the LDP (and indeed 15ha of Grade 2 land at South East Edinburgh was considered by a Reporter to be “a minor loss”).

The vast majority of greenfield land around Edinburgh (and particularly so within the West Edinburgh Study Area) falls within the scope of PQAL (predominantly Grade 2), and indeed the Council are favouring a very significant area of greenfield, greenbelt release (Norton Park - almost entirely grade 2) which will require, in their own words “*completely changing the character of the area in to an urban expansion*” (Choices for City Plan – Environmental Report), will result in the linear development of Ratho Village, and its coalescence with the wider Edinburgh conurbation impacting not only the setting of Ratho Village, but also of the City of Edinburgh.

### **Character of Ratho and its Landscape Setting**

The adjacent CALA development site was partly within the Conservation Area, and within the green belt, and would have formed part of the setting of Ratho (and its Conservation Area), and yet its development was not considered objectionable (by either the Council Officers in recommending approval, or by the Reporters confirming compliance with Policies E35 and E36 of the then RWELP). We do not understand how any different conclusion could be reached on impact on character of Ratho in respect of this proposal.

By virtue of that development (CALA) now being built out, the character of this edge of Ratho has already considerably changed in character, and that change needs to be taken in to account in considering this site. Therefore, we are of the view that the character of Ratho in this location will be continued, rather than changed (with no adverse impact on the character or setting of the Conservation Area), as a result of this proposed development.

In terms of the setting of Ratho, much like Ratho Village, and other locations where edge of settlement development is proposed, there will be a change to the setting of the settlement (but the wider setting will remain unchanged). Whilst this was considered adverse by the Council it does not represent a significant adverse impact (EIA Screening confirmed no EIA required) enough to rule out development in principle, and this site needs to be accommodated in the consideration process.

In terms of linear development, the Appeal Reporter accurately described Ratho as being a linear settlement, and that recent development had further elongated the settlement. Therefore, we would argue that the linear nature of this development is continuing the existing character and form of the settlement. The vary same criticism could be made of the proposed Norton Park development, but in that circumstance, the Council seems to be of the view that it is appropriate to “*completely change the character of the area in to an urban expansion*”.

We therefore believe that a short term allocation of land should be made for 150-200 homes on land at Freelands Road to meet the current housing need and demand. We also believe that a medium to long term safeguarding made for further land at Freelands Road to the east to be brought forward in the event of a failure in the land supply, or in the next LDP to provide the council and communities with the certainty expected of a plan led system.





**BDW Trading Ltd**  
LAND AT FREELANDS, RATHO



**BARRATT**  
HOMES



**DAVID WILSON HOMES**  
WHERE QUALITY LIVES



## The site

The land at Freeland's Road comprises approximately 24 acres of land proposed for residential development.

The site has capacity for approximately 150 to 200 homes, including 25% affordable, equating to the on-site delivery of 38 to 50 affordable homes on site.

The site is controlled by BDW Trading Ltd who are fully committed to the delivery of new homes as quickly and efficiently as possible.

BDW has delivered 2,000 homes within the City of Edinburgh Local Authority area in the last 5 years, with 448 in the last financial year 2018-19. This site at Freeland's Road forms part of the company's strategy of continuing to deliver homes to meet Edinburgh's housing need.



SITE PLAN WITH CONTEXT

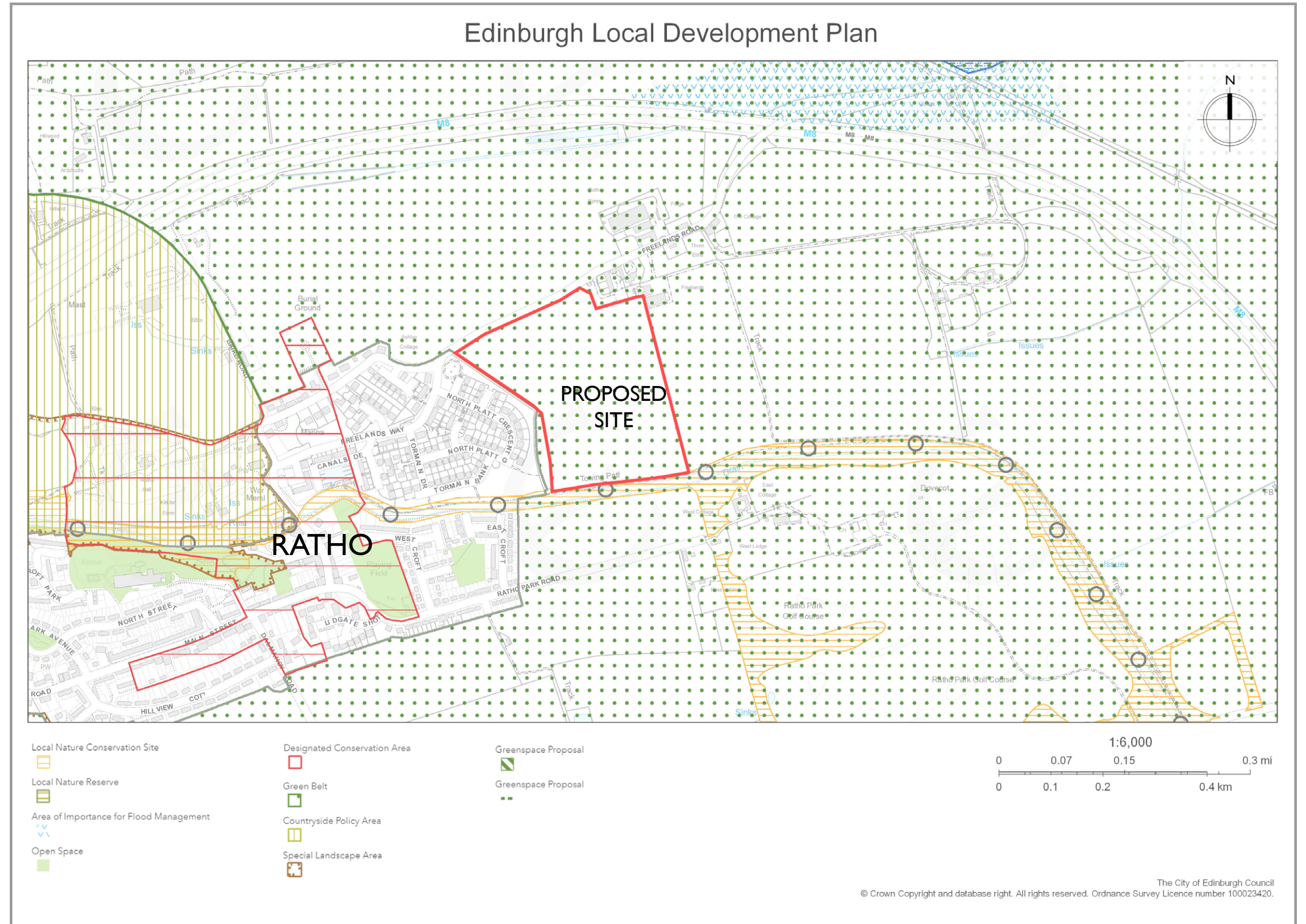


## Planning History

The site was previously promoted for residential development through the Edinburgh Local Development Plan (LDP2) between 2013 and 2016.

A planning application was submitted and appealed in 2016 and the appeal reporter noted that the ‘new housing would likely help support the existing services in the village (and could strengthen the case for new or improved commercial, civic or even public transport services)’.

Comments regarding landscape impact have been considered and the layout reviewed to demonstrate that the landscaping proposals would reduce inter-visibility between the canal and the development. This renewed focus will form part of the landscape mitigation strategy, which will be included within future promotion of the site via the emerging LDP review.














## Proposals

The site forms a natural continuation of Ratho and the proposed development would include forming a new softer, settlement edge.

Access to the site is proposed from Freelands Road, with enhanced pedestrian and cycle connections to the canal created providing both a recreational and commuter route for walkers and cyclists, supporting active travel methods.

The landscape appraisal has informed an initial landscape design strategy upon which a design layout will be based. This will ensure minimal visual impact both on the immediate surroundings, including the canal, and on longer distance views.

-  APPLICATION SITE BOUNDARY
-  VIEWS TO BE RETAINED
-  FRONTAGE
-  PROPOSED PEDESTRIAN LINKS
-  PROPOSED PRIMARY ROUTE
-  PROPOSED SECONDARY ROUTES
-  PROPOSED BUILD LINE
-  WOODLAND
-  PROPOSED OPEN SPACE



CONCEPT DIAGRAM



## Summary

The land at Freelands presents an opportunity for delivery of up to 200 new homes, including up to 50 affordable homes which would be delivered on-site.

In addition to developer contributions as required, the development of this site would create 60 direct construction jobs per year and 90 indirect and induced jobs in the wider economy per year. It would also generate a Gross Value Added of approximately £32 million.

Further, more detailed information will be submitted to the Council at the forthcoming Main Issues Report stage.

BDW is eager to work with the Council to help refine our proposals for this site as an allocation for residential development within the next revision of the City of Edinburgh Local Development Plan.



VISUALISATION OF LANDSCAPE STRATEGY



**BARRATT**  
HOMES



**DAVID WILSON HOMES**  
WHERE QUALITY LIVES