

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

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

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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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

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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 We agree that major expansion of the city should be accessible to attractive parkland of appropriate scale. That can be provided within large areas of development. Care should be taken with how policies are framed, so they are not overly prescriptive. Smaller scale developments may not have space to accommodate large amounts of greenspace and may not be able to achieve accessibility to the "extra large green space". Obviously some parts of the city are better endowed with existing green space than others, use of which related to new development may be more appropriate than creating overly large new spaces. It should be recognised that the Council's objective of significantly raising housing density within new developments will, by necessity, mean that there will be less room for green space. There are not 'one size fits all' solutions here and policies should be drafted accordingly.

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 Yes but this should not be at the expense of identifying sufficient land to meet development requirements. The Council's aspiration to significantly increase the density of new development is perhaps in conflict with providing land for allotments. It of course needs to be recognised that the demand for allotments is mostly driven by people not having sufficient garden space to grow food. There is obviously a trade-off between providing high density urban environments and space for allotments.

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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 We obviously agree with the principle of having enough space for burials, but we caution against identifying such space in a plan, as landowners may not bring it forward for such use. We would suggest that the Council looks to land which it controls in the first instance, but otherwise we would recommend a criteria based policy to allow providers to identify the sites most fit for purpose.

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 Yes in principle. However, it is stated that the Council favours factoring on behalf of the private landowner(s) but will consider adoption should sufficient maintenance resources be made available. We do not support the latter approach.

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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 It is important that the requirement “to demonstrate” is reasonable and proportionate. There are already various policies and guidance that require such demonstration and it is not made clear what change is proposed, therefore it is not possible to comment meaningfully. Care should be taken not to require onerous submission requirements to add to the already heavy and expensive burden of documentation to be submitted with a planning application.

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 Barratt welcome the opportunity to maximise the efficient use of land and have developed bespoke products to achieve this in locations across the City. Indeed, some of our city centre developments achieve densities over 100 dwellings per hectare. However, the prescriptive approach and blanket minimum density proposed will not be appropriate or possible in all locations across the authority area. The housetypes, layouts and storey heights required to achieve these densities will cause difficulties in achieving appropriate schemes in some locations. Considerations such as local heritage, landscape, topography, airport restrictions and of course market demand will make it difficult or unviable to deliver such densities. High density schemes can only be achieved by employing certain housetypes, thereby narrowing the range and type of new homes delivered. This has the potential to cause more acute affordability issues in certain demographics and types of households, who in their search for appropriate accommodation would be forced to look outside of the authority area. This would cause out migration and encourage more commuting, contrary to the aspirations of the plan. In addition, the application of some proposed policies elsewhere in ‘Choices’ would make it more difficult to achieve higher densities if it is to be calculated on a gross area basis e.g. provision of large open spaces and blue infrastructure. 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.

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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 We support active travel and achieving good connectivity, and it appears to us that existing policies and guidance already achieve this. It is not explained what the proposed revisions will entail and it is therefore difficult to provide any meaningful comment on this statement.

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 Unfortunately there is not enough information provided to comment meaningfully on this aspiration. There will necessarily be trade-offs between the provision of open space and density, and in our view this should always be considered on a site by site basis, taking account of surrounding character and uses. Policies should therefore be criteria based and not overly prescriptive. Also, we are of the view that student accommodation should generally be treated no differently than residential development in respect to design and quality standards.

Customer Ref: 01711 Response Ref: ANON-KU2U-GT29-D
Name Holder Planning
Response Type Agent / Consultant
On behalf of: BDW Trading Ltd

Supporting Info Yes
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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 Not Answered

Explanation Barratt is committed being the country's leading national sustainable housebuilder and have signed up to science-based targets for reducing carbon emissions. We have committed to reduce direct carbon emissions from our business operations (such as offices, sites, and show homes) by 29% by 2025 and will cut our indirect carbon emissions (such as those coming from our homes over their lifetime and from across our supply chain) by 11% by 2030. We have already worked hard to reduce our carbon emissions – since 2015 we have achieved a 22% fall in emissions with initiatives such as improving plant efficiency and rolling out energy efficient lighting. Using modern methods of construction to build more energy efficient homes is a major part of reducing our this, but it is part of a wider and more holistic approach to an overall lower carbon operation incorporating site design, engineering solutions, our office operations and through our supply chain. It is important that measures to reduce Carbon are brought in safely, efficiently and in the knowledge that they will make a real and lasting reduction to carbon emissions. The Platinum standard of the build regulations is currently incomplete (i.e. the text under the sub headings in the current document is 'not currently defined' for all sections except CO2 emissions), therefore it is not known what the rest of the standard will require. This is critical when looking at the overall design, functionality and efficiency of buildings. It is therefore very difficult to quantify the impact that the Platinum standard will have on the design, build program and cost of buildings. Moreover, it is not clear whether the required the supply chain and expertise to implement any additional measures is available. Barratt will continue to work towards improving the efficiently and adapting our products to meet higher standards, but this must be through a rigorous design process to ensuring the efficiency, longevity and deliverability of any new designs. The Government has responsibility for amending building regulations to ensure future sustainability. In our view it is critical that LDP policies should align with these, otherwise there is a significant risk that different Councils will have differing requirements. Housebuilders and their supply chains would find it almost impossible to work in such an adhoc and piecemeal policy context.

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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

Explanation Yes, but great care will be needed to ensure that participants are well-informed about constraints and opportunities, to avoid unrealistic expectations and outcomes. It will also be important to avoid delay to what already appears to be an overly-ambitious timetable for the delivery of housing. Moreover, it is strongly recommended that developers are involved in the process, to provide their expertise and experience.

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 See answer to Q4A below
Yes, but great care will be needed to ensure that participants are well-informed about constraints and opportunities, to avoid unrealistic expectations and outcomes. It will also be important to avoid delay to what already appears to be an overly-ambitious timetable for the delivery of housing. Moreover, it is strongly recommended that developers are involved in the process, to provide their expertise and experience.

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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

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

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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 Yes, although it is not made clear if this will be any different to current policies. The requirement for any infrastructure must be properly justified and in accordance with the Government Circular

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 The Council's current cumulative methodology has been recently rejected by the Government. Further work by the Council is therefore needed to demonstrate that its approach to contributions meets the various tests in the Government Circular. Also, we are of the view that all forms of development should be subject to planning gain requirements, including affordable housing.

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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 agree that statutory supplementary guidance should no longer be used, which is in any case not supported by the new Planning Act. In our view, it is crucial that all matters, including developer contributions, that have a significant implication for the viability and delivery of housing are included within the LDP and not within Action Programmes or non-statutory guidance. This approach allows for consultation and independent scrutiny, which must be the case for such important matters. We would also say that developer contribution amounts should be fixed at the level they are at when a planning application has been submitted, and not amended upwards thereafter.

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 the current methodology for assessing accessibility of public transport and active travel routes seem overly negative e.g. sites next to high frequency bus routes and/or with access to cycling and walking routes are not recognised as such on the basis of what appears to be flawed assessment or a lack of exploration of new opportunities. We accept that walking/cycling routes and public transport are necessary, and there should be more positive consideration of improving existing links or creating new ones.

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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 Yes perhaps so long as the participation is well-informed and realistic. People still need cars for trips where public transport or active travel is not an option. It may be too easy for communities with existing good access to parking to seek that new development does not also benefit. It is our experience that where low levels of parking has been provided on some developments, it encourages inappropriate parking to the detriment of the amenity of the area, sometimes obstructing pedestrians and cyclists. We believe that a significant reduction in car parking standards may have a number of negative consequences, including providing for varying needs.

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 There is not enough information to agree or disagree. It fundamentally depends on how much parking is going to be made available. See answer to Q6B below
Yes perhaps so long as the participation is well-informed and realistic. People still need cars for trips where public transport or active travel is not an option. It may be too easy for communities with existing good access to parking to seek that new development does not also benefit. It is our experience that where low levels of parking has been provided on some developments, it encourages inappropriate parking to the detriment of the amenity of the area, sometimes obstructing pedestrians and cyclists. We believe that a significant reduction in car parking standards may have a number of negative consequences, including providing for varying needs.

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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 Yes, but there is no indication of what this update will involve, so as to allow meaningful comment. Also, we could only support this if the anticipated transport infrastructure is in place. Otherwise, it would only be appropriate to future-proof sites for provision of the suggested facilities.

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 Yes but there is no detail to comment on.

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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

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

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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

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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 Such a policy is likely to be too prescriptive, and should have regard to surrounding character. We support the aim of achieving mixed uses but that consideration depends on the mix of uses surrounding the site. One should not consider student accommodation application sites in isolation.

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

Customer Ref: 01711 Response Ref: ANON-KU2U-GT29-D
Name Holder Planning
Response Type Agent / Consultant
On behalf of: BDW Trading Ltd

Supporting Info Yes
Email robin@holderplanning.co.uk

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 No

Explanation Such a policy would not accord with Scottish Planning Policy paragraph 129, which states; "The level of affordable housing required a contribution within a market site should generally be no more than 25% of the total number of houses" Barratt has built approximately 2,000 homes in the City of Edinburgh Local Authority area in the last 5 years. Of those approximately 570 were affordable. BDW have a further 1,780 homes with planning permission on both green and brownfield sites that have commenced work and 469 of these will be affordable. BDW are committed to delivering a range of both market and affordable housing in Edinburgh, however does not support an increase in the affordable requirement from 25% to 35% for the following reasons: -The LDP is being prepared under current legislation, with SPP is still in place as the extant National Policy, this states that the affordable housing requirement should be no more than 25%. -Affordable housing demand is a result of historical undersupply across all tenures. Unless the whole housing requirement is planned for and met, affordability issues will perpetuate, regardless of the affordable target. In order to deal with a shortfall in affordability. A plan that allocates a range and choice of housing sites is more likely to ensure delivery of the homes required to meet the needs of the population. A range of brownfield and greenfield sites, of varying sizes and in different locations, will allow the market to deliver the homes required meet housing need across all tenures within the plan period.

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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: No

Explanation
We support an approach that allows a broad range of type and tenure of homes to be included in the affordable proportion of homes in developments. Where a strict prescriptive approach to the proportion of different types is taken, this can have a negative impact on viability, delivery timescales and design. The design guide should be produced in conjunction with the developer and not determined by the RSL. We do not support the representative mix, as we work with the RSL to meet its needs, which is 1, 2 & 3 bed properties regardless of what is being built on the private site. The further downside to a representative mix is that densities would reduce overall as the land-take for the affordable element would increase. HVNS is wide ranging and we only support its broad principles, as not all of its criteria can be met.

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Choice 12 A

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

Short Response Not Answered

Explanation

We do not support any of the options because none of them is likely to provide the context to deliver sufficient housing to meet Edinburgh's housing need and demand until 2032. However, we could support an alternative to Option 3 (Blended Approach), which allocates much more land for housing than currently proposed. Our response to question 12A is structured to reflect the underlying methodology of establishing how much housing land is required to meet future requirements, following Scottish Planning Policy i.e. 1. Establish housing need and demand i.e. from HNDA 22. Establish the Housing Supply Target (HST) to properly reflect HNDA 23. Establish the Housing Land Requirement by adding 10 - 20% to the HST4. Estimate the amount of housing that can be delivered from the Established Housing Land Supply5. Allocate additional housing land to make up any shortfall between the Established Land Supply and the Housing Land Requirement. Following this, we have undertaken a critique of Options 1, 2 & 3, and finally we propose an "Alternative Option 3" HOUSING NEED AND DEMAND IN EDINBURGH Scottish Planning Policy (para 113) requires plans to be informed by a robust housing need and demand assessment (HNDA). HNDA 2 is the most recent assessment of need and demand in Edinburgh which has been agreed as robust and credible, and we therefore support its use as the basis for establishing the Housing Supply Target for CityPlan 2030. Moreover, in the context of current circumstances, we support the use of the Wealth Distribution Scenario. HNDA 2 identifies the following need and demand in Edinburgh from 2019 - 2032 (taking account of house completions up to 2019):

| | | |
|-------------------------|-----------------------------------|--------------------------------|
| 1. Wealth Distribution: | Affordable Housing - 44,586 units | Private Housing - 22,588 units |
| | Total - 67,174 units | |

Scottish Planning Policy (para 115) indicates that the Housing Supply Target should be reasonable, should "PROPERLY REFLECT" the estimate of housing demand, and should be supported by compelling evidence. As explained below, none of the 3 options presented in the Choices document comes close to meeting the housing need and demand identified in the Wealth Distribution Scenario of HNDA 2. In our view, the approaches suggested are contrary to Scottish Planning Policy in that they do not "properly reflect" the HNDA estimate and are not supported by compelling evidence. There is a reference in the Council's documentation to the other factors involved in setting the housing target, however, it is not explained in any detail why a downward adjustment from the HNDA output is justified having regard to the "wider economic, social and environmental factors, issues of capacity, resource and deliverability, and other important requirements such as the aims of National Parks" required by Scottish Planning Policy. This is an important matter given the historic severe undersupply of housing and housing land in Edinburgh and requires further attention. It is not clear if the Council has considered in any detail how first housing need and demand could be met before deciding a reduced HST was necessary. In this regard the HSTs in Choices could be seen to be have been set using a 'back to front' methodology. Recent LDP Examination decisions such as those at Falkirk and Stirling are instructive on this matter. The findings of the Falkirk Reporter are quoted below: "I agree with representees that this is not an appropriate approach for the council to have adopted; diagram 1 on page 30 of SPP makes clear that the setting of the housing supply target comes before the identification of land, as does a fair reading of SPP paragraph 120." (Issue 2, para. 35) "In my view it is illogical to take a supply-led approach to the setting of the housing land requirement. The housing land requirement is intended to be the driver for ensuring a sufficiently generous supply of land is available to meet the housing supply target. If the housing land requirement is derived from the identified supply, rather than the opposite way round, the

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housing land requirement cannot have directly informed decision-making over which sites ought to be allocated.” (Issue, para. 71)Edinburgh has not been in a position recently where it has even attempted to allocate sufficient land to meet its own housing need and demand in full. Instead, a significant proportion of its need and demand has been redistributed to other authorities. As we refer to below, there is no reference in Choices 2030 to meeting any of Edinburgh’s housing need and demand elsewhere.HOUSING SUPPLY TARGETThe Choices document states that Edinburgh’s housing target 2019 to 2032 is: Market Housing - 22,600Affordable Housing - 20,800Total - 43,400THIS COMPARES WITH THE HNDA 2 TOTAL NEED AND DEMAND OF 67,174 HOMES, WHICH IS A SHORTFALL OF 23,774 HOMES. IN OTHER WORDS, CHOICES 2030 IS PROPOSING TO MEET ONLY 65% OF THE NEED AND DEMAND.THE MAIN REASON FOR THIS IS THAT COUNCIL CONSIDER THAT THE 23,786 AFFORDABLE HOMES CANNOT BE PROVIDED FOR. THE DECISION TO THEREFORE IGNORE THIS MASSIVE SHORTFALL IN MEETING THE NEED FOR AFFORDABLE HOUSING IS NOT PROPERLY JUSTIFIED, DOES NOT PROPERLY REFLECT THE HNDA AND, IN OUR VIEW, IS DEEPLY FLAWED.To undersupply housing land in Edinburgh by nearly one third of requirements is likely to have a very significant impact on the housing market over the coming years. The Council acknowledges the current significant shortfall of affordable housing and the proposed strategy can only serve to massively exacerbate the problem. Given that Scottish Planning Policy for delivering more affordable housing hinges on a proportion of market sites being given over to affordable housing, an obvious alternative is to increase housing land release overall, which can accommodate market and affordable homes.If the Council does not intend to distribute any of its housing need and demand to neighbouring Council areas, as has been traditionally the case, then it should aim to have a strategy which meets need and demand within its own boundaries, or at least adopt a strategy that “properly reflects” the HNDA as required by Scottish Planning Policy.We understand the Council’s case for not adopting such a strategy, which is that there is doubt, based on historic completions rates, that the amount of housing actually required can be delivered. This, in our view, is not a reason to suppress the HST. This is because if the HST is suppressed to reflect historic completion rates rather than actual demand, it will mean that there is insufficient land allocated for the market to respond to that demand. In other words, the suppressed HST dictates and constrains delivery.IN OUR VIEW, THEREFORE, CITYPLAN SHOULD SET AN ALL TENURE HOUSING SUPPLY TARGET IN LINE WITH THE HNDA 2 WEALTH DISTRIBUTION SCENARIO I.E. 67,174 HOMES.Moreover, the precise splits between tenures are sensitive to minor changes in variables. The variables can change significantly over time. We therefore consider that the all tenure output of the HNDA should be the primary piece of information which informs the HST. This approach was endorsed by the Reporter at the recent Falkirk LDP Examination (DPEA ref. LDP-240-2), as follows:“I do however acknowledge that needs and demands for different tenures are likely to vary over the course of the plan period. Therefore I reiterate that it is the overall, all tenure housing supply target against which the number of completions and availability of effective land should ultimately be tested, regardless of tenure.” (Issue 2, para. 66) EXISTING (ESTABLISHED) HOUSING SUPPLYThe existing housing supply is made up of two components – effective and constrained sites. Although we agree that sites which are identified as effective in the 2019 Housing Land Audit should be taken into account, we question the number of units which is assumed will be delivered by 2032. This is because the Council appears to have assumed that all effective sites will be developed in their entirety by 2032, when in reality the rate of delivery on some larger sites will mean that the development is unlikely be completed by that date. Homes for Scotland have assessed this matter in detail in their submission to Choices 2030, and have calculated that 21,055 dwellings rather than the 22,696 identified in the Council’s Housing Land Study are likely to come forward. The calculation that HfS have undertaken is robust, based on projecting forward the programming shown in the 2019 HLA for the first 7 years of development. This approach has recently been supported by the Report of Examination on the Aberdeen City & Shire Strategic Development Plan, as follows:“The approach used by Homes for Scotland where the programming of sites is extrapolated beyond the period stated in the housing land audit is well-evidenced with tables showing each site in each authority and market housing area. There will be instances where sites perform better and some which deliver less than the extrapolated method shows but it reasonably carries forward the last known (and agreed) programme of delivery on each site into the

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future. Therefore, I consider that it can be effectively used to predict the amount of the established supply that is considered to become effective during the periods 2027 to 2032 and 2033 to 2040.” (para. 26, p. 193, Issue 14)The Housing Land Study identifies the future delivery of 7,468 houses on constrained sites. This is a highly optimistic assumption given that constrained sites by their nature have impediments to overcome and no identified solution. In some cases we accept that these constraints may be overcome. However, equally sites which are currently considered effective may become constrained over time. Therefore, in our view, only currently effective sites should be relied upon to contribute to the land supply and this approach was also endorsed in the Report of Examination for the Aberdeen City and Shire SDP.THUS, AGAINST THE COUNCIL’S ASSUMPTION THAT THE EXISTING HOUSING LAND SUPPLY WILL DELIVER 30,164 UNITS, WE ARE OF THE VIEW THAT THIS SHOULD BE ASSUMED TO BE 21,055 UNITS.ESTABLISHING THE HOUSING LAND REQUIREMENTSScottish Planning Policy (para 115) requires plans to allocate 10 – 20% more homes than the Housing Supply Target figure to provide generosity and flexibility. The Choices document proposes the lowest level of generosity at 10%. We support this approach but only on the basis that no delivery is assumed from constrained sites as described above and also that a more realistic approach is taken to delivery assumptions from the 142 ‘new’ brownfield sites described in the Housing Study (see below). The Council’s delivery assumptions are highly speculative and optimistic in our view and even if generosity was pegged at 20% it would be too little to account for the risk of the supposed supply not delivering.SO THERE IS A BALANCE TO BE STRUCK BETWEEN THE RELATIVE RISK OF THE ESTABLISHED HOUSING LAND SUPPLY NOT DELIVERING AS PREDICTED AND THE %AGE GENEROSITY. IN THE CONTEXT OF THE ASSUMPTIONS MADE IN CHOICES 2030, IT SHOULD BE SET AT 20% AT LEAST.HOWEVER, IN THE FOLLOWING SECTION WE HAVE USED A FIGURE OF 10%, ON THE BASIS THAT MORE REALISTIC DELIVERY ASSUMPTIONS FOR CONSTRAINED AND NEW BROWNFIELD SITES WILL BE USED.NEW LAND REQUIREMENTFollowing on from the above considerations, it is reasonably straight forward to calculate the number of new homes for which new land needs to be allocated in CityPlan. Housing Need & Demand 2019 – 2032: 7,174 unitsHousing Supply Target: 67,174 unitsHousing Land Requirement (HST + 10%): 3,892 unitsEffective Housing Supply: 21,055 unitsNew Land Requirement: 52,837 unitsCRITIQUE OF OPTIONS 1, 2 AND 3 IN CHOICES 2030OPTION 1Option 1 proposes to deliver 17,600 houses in the plan period on land within the urban area through rapid intervention by the Council and its public sector partners. If landowners do not bring forward the identified sites for development the Council proposes compulsory purchase.As explained in the Housing Land Study, 142 brownfield sites have been identified which are stated to have medium to high potential for housing. As we explain below there is not any evidence presented to indicate that this is in fact the case. Some of the sites may meet planning objectives e.g. proximity to public transport, but there is significant doubt regarding delivery.Although we fully recognise and support the priority to bring forward brownfield land for development, unfortunately Option 1 has a number of fundamental problems which should rule it completely out of contention.Firstly, the identified capacity of 17,600 is only about 33% of the number of additional new houses required to meet Edinburgh’s need and demand.Secondly, it is highly unlikely that the 142 identified sites will be developed in their entirety by 2032.The deliverability of these sites has not been considered in the Housing Study. Important basic information about the sites is apparently unknown including whether the owner is interested in selling / developing the site and who owns them. Just 6ha of land (capacity for 428 dwellings) is identified as suitable. A further 140ha is identified as being partially suitable for development (7,767 dwellings) and 127ha (8,406 dwellings) as unsuitable. Nevertheless, it has been assumed that all of these sites, whatever their classification will be delivered in full during the plan period, apparently disregarding the suitability review. Of the 275ha of land just 11ha is vacant. The delivery of the land therefore assumes that the operation of existing businesses or public sector organisations will cease. For this to be the case residential development would need to create a land value in excess of the value of the premises in its current use and provide sufficient incentive for the landowner to sell. This has not been considered in the Housing Study and should not necessarily be assumed for the following reasons:1.The change of use of industrial to residential will have a heavy cost burden, including significant developer

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contributions and often high abnormal land remediation costs. In many cases this may make residential development economically unviable.2.The City Plan Industrial Property Market finds that industrial site vacancy rates are low in Edinburgh and rents are growing. This picture is similar in South East Scotland with Ryden's 85th Scottish Property Review noting that vacancies are at record low levels (p. 20). Moving location will be difficult for many operators and so they may well place a particularly high value on sites for owner-occupiers or outstanding lease periods for tenants. This will mean that asking prices for those that may be willing to sell could also reflect valuations of the operating companies as going concerns. Many of these sites will have already been considered by private developers with the landowners approached. It is for the Council to explain how, despite having not come forward to date, they will be delivered for housing, despite the financial burdens of planning policy being increased, reducing the land value which could be offered by a prospective developer. The lead in times for many of the sites, even if they are in single ownership and can be viably developed, will be lengthy. Existing leases would need to expire or be bought out, which would add to viability challenges. However, for many sites, there will be multiple ownerships, where conflicting interests will add to the difficulties. Compulsory purchase is unlikely to be solution due the complexity, length, cost and uncertainty of the procedure. It is questionable whether CPO would be successful if seeking to acquire land occupied by active businesses with employees unless there were already other suitable premises in suitable locations available. One would also question the desire of the Council to even want to proceed in individual cases that involved forcing the closure of businesses and related loss of employment.The time taken to go through the process should also not be underestimated. It will presumably be necessary to give the owners a chance to bring the site forward for development themselves. This could be a period of five years, but many sites may well have current leases lasting longer than this. It would then be necessary to make efforts to obtain the sites on the open market. A CPO may be able to be ran alongside this but the process would still take many years. For instance for the St James Centre, approaches were first made to owners in 2008 and has only been completed 12 years later. The costs and logistics of running multiple contentious CPOs simultaneously will also likely be prohibitive. Moreover, much of this land is currently in employment use, and the Choices document says intervention will be required to deliver 275 hectares of employment land. There is virtually nothing in the Choices document to explain how this provision of employment land will transition without resulting in significant economic upheaval and related negative impacts for employment and service delivery.OPTION 2Option 2 proposes 27,900 homes on a number of large-scale greenfield sites around the City. Although we support the release of these sites, there are a number of flaws in this strategy.Firstly, the number of homes proposed is only just over half of the additional new homes required to meet housing need and demand in full.Secondly, it is unlikely that the number of houses proposed can be delivered on these sites by 2032. There are about 10 ownership interests involved and a rough calculation would suggest that each of these might deliver in the region of 200 homes per year once started. Given the strategic nature of these sites and the lengthy planning and related consenting process it is realistic to assume that development is unlikely to begin until 2025 at the earliest. An realistic assumption might be that each site will therefore deliver 200 houses/year for a 7-year period up to 2032, producing a total of approximately 14,000 houses, which is significantly below the ambition of 27,900.It is therefore clear that significant additional new sites are be required, simply to get closer to meeting full housing need and demand.OPTION 3Option 3 is described as the blended approach, focussing on greenfield and brownfield land. However, it too has fundamental shortcomings.Firstly, it only proposes 17,600 houses in total, the same as Option 1, which as explained above is only a fraction of what is required to meet Edinburgh's housing need and demand.Secondly, although it assumes 11,000 houses are built on the 142 urban brownfield sites identified rather than 17,600 in Option 1, in our view this continues to be a very significant over-estimate of what can be achieved for the reasons we have explained under Option 1.Also, the proposal for 6,600 houses on greenfield sites significantly under-utilises the delivery potential on sustainable sites around Edinburgh.ALTERNATIVE OPTION 3We agree that a 'blended approach' of greenfield and brownfield land release for housing is appropriate but it should seek to deliver significantly more homes than is likely to arise from Option 3.If Edinburgh's housing need and demand is to be met in full then that

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would mean that new land for 52,837 homes would need to be identified. However, we accept that it is not a realistic proposition that this number of houses (minus 10% generosity) could be delivered in the plan period in addition to the effective housing land supply. It is notable that the Choices document does not envisage that at least some of the very large proposed shortfalls in meeting Edinburgh's housing need and demand in full should be accommodated elsewhere in the City Region. This is the approach that has been the cornerstone of strategic planning for housing in the Region for many decades, and its abandonment now has significant consequences for the City. To simply ignore the unmet housing need and demand that would inevitably arise from any of the 3 Options proposed in the Choices document is not, in our view, a reasonable or acceptable approach. Nor does it comply with Scottish Planning Policy or Government aspirations for the delivery of housing to reflect need and demand. We therefore propose an Alternative Option 3. As described below, this is more realistic in regard to the delivery of housing on brownfield land, but continues to be aspirational to ensure that its potential is maximised. Greenfield land has much greater potential than identified in Option 3. In our view, a more reasonable and realistic assumption for delivery from new brownfield sites within the plan period is 6,000 homes. Even that will be a significant challenge given the issues we have noted above in respect to viability, lead-in times, CPO etc. Option 2 of the Choices document indicates that 27,900 units can be delivered on the greenfield sites identified. However, because of lead-in times for development and the limit to the rate of development on individual sites, it is inevitable that additional greenfield sites will need to be identified to achieve this total within the plan period.

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

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Name

Response Type

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Supporting Info

Email

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

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

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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

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 Not Answered

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

Explanation

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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
Barratt Homes do not object to any of the housing allocations proposed in Choices 2030. However, as explained in answer to Q12A, the number of greenfield allocations proposed by all three strategy options is significantly less than needed to approach meeting Edinburgh’s housing need and demand. In particular there is almost a complete absence of smaller housing sites proposed, which could make a significant contribution to the significant shortfall in housing provision in the short to medium term. Although the allocation of large strategic sites is to be welcomed, past experience is that such sites will have long lead-in times and will be dependent on significant infrastructure provision, which in many cases is not yet in place. With that in mind, Barratt Homes are therefore seeking the allocation of a site for housing at Frogston Road East, within the South of Frogston Road East Assessment Area in the Housing Study. A brief document which identifies the boundaries of the Frogston Road East site, its context and Barratt’s proposals is submitted in response to Q12C. The land at Frogston Road East comprises approximately 17 hectares proposed for residential development. The site has capacity for up to 500 homes including affordable homes on site along with shops, business space, open space, landscaping and SUDs. Respectfully, it appears to us that the non-identification of the site for potential housing development in Choices 2030 may be partly due to a number of incorrect assumptions and conclusions in the Area Assessment contained in the Choices 2030 Housing Study. We appreciate that the preparation of such assessments for so many sites is challenging, and can lead to broad brush conclusions which do not necessarily reflect the actual circumstances for a particular site. A particular constraint of the assessments undertaken by the Council is that the areas assessed are often larger or have different boundaries to the site being promoted for development. That is not a criticism of the assessment process, but it does mean that the assessment conclusions are not necessarily applicable to the site in question. Indeed, this is the case for Frogston Road East, It is obviously crucial that the site being promoted is considered on the correct basis, and to assist in this process Barratt has enlisted a number of experts to review the Frogston Road East site against the various criteria in the Assessment. We have therefore listed below each of the Assessment criteria for the South of East Frogston Road area and provide comments in capital letters on where we agree and disagree with the conclusions.

Does the site fit within an area identified as a strategic development area? Partially – The eastern part of the site is within the South East Edinburgh SDACOMMENT: ALL OF THE FROGSTON ROAD EAST SITE IS WITHIN THE SDA. THIS STATUS SHOULD BE A SIGNIFICANT FACTOR IN DECIDING TO ALLOCATE OR GRANT PERMISSION FOR A SITE FOR HOUSING, ALBEIT SUBJECT TO SITE SPECIFIC MATTERS. Does the site support travel by foot to identified convenience services? No – The site is not within walking distance to local convenience services. It is unlikely that access can be improved and convenience services are unlikely to be provided on the site due to lack of scope for development nearby. COMMENT: THIS COMMENT IS OUT-OF-DATE AS THERE IS A FARM SHOP AT MORTONHALL GARDEN CENTRE ACROSS THE ROAD FROM THE SITE WHICH SELLS A RANGE OF CONVENIENCE ITEMS, SEVEN DAYS A WEEK. THERE ARE ALSO A NUMBER OF SHOPS IN NEARBY GRACEMOUNT. ALSO, AS SHOWN ON THE MASTERPLAN SUBMITTED IN RESPONSE TO Q12C, WE ARE PROPOSING TO ACCOMMODATE SHOPS AND BUSINESS FLOORSPACE WITHIN THE DEVELOPMENT. Does the site support travel by foot to identified employment clusters? No – The site is not within walking distance to employment clusters. It is unlikely that access can be improved and employment

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clusters are unlikely to be provided on the site due to lack of scope for development nearby.COMMENT: THIS IS INCORRECT. BROOMHILLS BUSINESS CENTRE PROVIDES OFFICE ACCOMMODATION. THE NEARBY GARDEN CENTRE AND CAMPSITE ARE THRIVING BUSINESSES. ALSO, AND PERHAPS MOST IMPORTANTLY, STRAITON RETAIL PARK IS WELL WITHIN THE WALKING DISTANCE OF 2,400 METRES. STRAITON RETAIL PARK SUPPORTS HUNDREDS OF JOBS. THE DEVELOPMENT OF THE ADJACENT BROOMHILLS SITE WILL PERMIT PASSAGE SOUTH-EASTWARDS THAT DOES NOT CURRENTLY EXIST. A SIGNAL CONTROLLED CROSSING OF BURDIEHOUSE ROAD DOES CURRENTLY EXIST AND THIS ENABLES ACCESS TO THE EAST SIDE OF THE ROAD, WHICH MAKES THE CROSSING OF THE STRAITON JUNCTION MORE COMFORTABLE.Does the site have access to the wider cycle network?No – The site does not have access to the wider cycle network and access is unlikely to be improved as no suitable potential cycle route interventions have been identified which could serve the site.COMMENT: PAGE 21 OF THE ACTIVE TRAVEL ACTION PLAN (ATAP) SHOWS A ROUTE DIRECTLY OPPOSITE THE SITE. THIS HAS NOT YET BEEN TAKEN FORWARDS INTO QUIET ROUTES MAPPING, BUT DEVELOPMENT OF THE SITE COULD HELP DELIVER THIS LINK. THE ATAP MAPPING SHOWS THAT CECS COMMENT ON THIS IS INCORRECT. NB THE CRITERON STATES “ASSESSMENT SHOULD ALSO TAKE INTO ACCOUNT IDENTIFIED ACTIVE TRAVEL INTERVENTIONS WHICH MAY IMPROVE AND EXPAND THE NETWORK, INFORMED BY THE ACTIVE TRAVEL ACTION PLAN AND THE ONGOING EDINBURGH STRATEGIC SUSTAINABLE TRANSPORT STUDY.” WE ALSO NOTE THAT WITHIN Q8B THERE IS REFERENCE TO THE PENTLANDS TO PORTOBELLO CYCLE LINK WHICH CAN LINK THROUGH THE SITE.Can the site support active travel overall through appropriate intervention?No – The site would not support active travel overall, as the site is not within walking distance of local convenience services and employment clusters. Access to the wider cycle network is poor and it is unlikely to be improved through an identified intervention.COMMENT: FOR THE REASONS GIVEN ABOVE, THIS CONCLUSION IS WRONG. CYCLE AND FOOTPATH CONNECTIONS WOULD BE PROVIDED ON SITE AND WOULD CONNECT INTO EXISTING PATHS, INCLUDING THE CURRENT LOCAL PATH ALONG BROOMHILLS ROAD ALONG THE EASTERN BOUNDARY OF THE SITE. THERE IS ALSO THE OPPORTUNITY TO LINK UP GAPS BETWEEN EXISTING CORE PATHS IN THE AREA, LINKING THROUGH THE SITE. Does the site support travel by public transport through existing public transport network accessibility and capacity?Partially – The site has limited support for travel by public transport based on existing or incrementally improved provision.COMMENT: PUBLIC TRANSPORT PROVISION IS GOOD, INCLUDING THE FREQUENT NO. 11 BUS WHICH LINKS TO THE CITY CENTRE AND SERVICE 400 WHICH DIRECTLY LINKS THE SITE WITH EDINBURGH PARK AND THE AIRPORT WITHOUT THE NEED TO CHANGE BUSES. MOREOVER, IT IS THE SAME BUS SERVICE THAT SERVED THE BROOMHILLS SITE WHEN IT WAS ALLOCATED, WHICH WAS DEEMED TO BE EXCELLENT AND SUSTAINABLE.THE BURDIEHOUSE AREA IS IDENTIFIED IN THE DRAFT CITY MOBILITY PLAN AS BEING AN AREA WITH GOOD PUBLIC TRANSPORT ACCESSIBILITY AND THE SITE IS LOCATED ON A ROUTE IDENTIFIED FOR IMPROVED PUBLIC TRANSPORT WALKING AND CYCLING ROUTE CONNECTING STRATEGIC DEVELOPMENT AREAS IN THE DRAFT CITY MOBILITY PLAN SPATIAL VISION. THE STRATEGIC SUSTAINABLE TRANSPORT STUDY IDENTIFIED ‘CORRIDOR 4- CITY CENTRE TO EASTER BUSH/STRAITON’, WHICH PASSES THROUGH BURDIEHOUSE, AS ONE OF THE OPTIONS FORMING A BASIS FOR CONSIDERATION OF TRANSIT OPTIONS. THIS ROUTE HAS POTENTIAL TO LINK INTO THE SAFEGUARDED TRAM ROUTE ALONG CORRIDOR 3, WITH STRAITON PARK & RIDE AS A POTENTIAL ANCHOR TO THE SOUTH. ANALYSIS OF CORRIDOR 4 NOTES IN APPENDIX A OF THE STUDY NOTES, IN RELATION TO DEVELOPMENT IMPLICATIONS THAT ‘SITES TO THE IMMEDIATE WEST AS OF THE CORRIDOR (I.E. BUILD-OUT FROM THE EXISTING URBAN DEVELOPMENT), COULD READILY BE SERVED BY THE EXISTING ROUTE’. THE LAND AT FROGSTON ROAD IS LOCATED TO THE IMMEDIATE WEST OF EXISTING DEVELOPMENT WITHIN CORRIDOR 4. THIS SITE THEREFORE PROVIDES THE OPPORTUNITY FOR PLAYING A KEY PART IN REALISING BOTH THE HOUSING AND TRANSPORT ASPIRATIONS OF CITY PLAN 2030 AND CITY MOBILITY PLAN. 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 site has limited support for travel by public transport without major intervention deliverable within the plan period.Comment – The site has good public transport as things stand. GOOD POTENTIAL FOR IMPROVEMENTS TO EXISTING SERVICES AND ROUTES AND FOR TRANSIT LED DEVELOPMENT IN THE AREA AS NOTED IN

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THE TRANSPORT STUDY AND AS NOTED ABOVE. Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention? No – The site does not have sufficient primary school infrastructure capacity. COMMENT: SEE COMMENT BELOW. Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention? No – The site does not have sufficient secondary school infrastructure capacity. COMMENT: SEE COMMENT BELOW. If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period? Partially – The site does not have sufficient community infrastructure capacity to support development but this can be addressed through extension of the new primary school at Broomhills, depending on the scale of development, and provision of additional capacity at Gracemount High School. COMMENT: AGREED. THE SITE IS ALREADY IDENTIFIED AS BEING WITHIN THE CATCHMENT OF THE NEW BROOMHILLS PRIMARY SCHOOL AND WILL BE JUST 200M TO THE EAST OF THE SITE WHICH IS DUE TO OPEN IN AUGUST 2020. Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence? No – No scope for development has been identified on this site due to its strong contribution to the setting of the city, visually prominent location, and being beyond the firm settlement boundary formed by Frogston Road East, estate walls and woodland with little opportunity to form a new boundary. COMMENT: WE DISAGREE. BARRATT'S LANDSCAPE AND VISUAL ASSESSMENT SUBMITTED IN RESPONSE TO Q12C CONCLUDES THAT THE PROPOSED DEVELOPMENT IS BROADLY ACCEPTABLE IN LANDSCAPE AND VISUAL TERMS. PROPOSALS FOR ROBUST LANDSCAPE PLANTING AND OPEN SPACE WILL ENSURE ACCORDANCE WITH THE DESIGN AIMS TO ENHANCE THE COUNTRYSIDE AND RURAL ENVIRONMENT, THE LANDSCAPE SETTING OF THE CITY, AND THE OPEN SPACE GENERALLY, AS WELL AS TO ENSURE CAREFUL INTEGRATION OF NEW BUILDING INTO THE LANDSCAPE. 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? Partially – The site may be considered of value for the strategic green network, due to lying within an area identified as a green network opportunity in Edinburgh itself. COMMENT: DEVELOPMENT OF THE SITE WILL CREATE OPPORTUNITIES TO CONNECT TO THE STRATEGIC GREEN NETWORK. Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management? Partially – Part of the site is covered by identified areas of medium-high flood risk and an area of importance for flood management. This does not cover the majority of the site however. COMMENT: THE SITE PROPOSED FOR DEVELOPMENT IS NOT WITHIN AN AREA OF FLOOD RISK. THE BURDIEHOUSE BURN LIES TO THE SOUTH WEST OF THE SITE AND IS APPROXIMATELY 90M TO THE SOUTH OF THE SITE AT ITS CLOSEST. THE EXTENT OF THE 1 IN 200-YEAR PLUS 40% CLIMATE CHANGE FLOOD RISK AREA ASSOCIATED WITH THE BURDIEHOUSE BURN HAS BEEN IDENTIFIED THROUGH A STAGE 1 FLOOD RISK ASSESSMENT OF THE SITE. THIS AREA APPROXIMATELY CORRELATES WITH THE AREA IDENTIFIED IN THE SEPA FLOOD MAPS AND ALSO THE AREA IDENTIFIED AS A FLOOD MITIGATION AREA IN THE CURRENT LDP. IT RUNS ALONG THE SOUTH WESTERN BOUNDARY OF THE SITE. NO DEVELOPMENT IS PROPOSED WITHIN FLOOD RISK AREA. ALL DEVELOPMENT WILL BE SET BACK FROM THE EDGE OF THE FLOOD RISK AND THE AREA WILL FORM PART OF THE LANDSCAPE STRATEGY. SURFACE WATER MANAGEMENT WILL ALSO BE INCORPORATED INTO THE OPEN SPACE AND LANDSCAPING DESIGNS. Is the site suitable for development? No. The site is not suitable for development due to its present use, landscape character and contribution to the strategic green network. COMMENT: THE SITE'S PRESENT USE IS AGRICULTURAL WHICH IS NO DIFFERENT TO OTHER GREENFIELD SITES WHICH HAVE BEEN ALLOCATED. THE AGRICULTURAL FIELDS THEMSELVES MAKE LITTLE CONTRIBUTION TO THE STRATEGIC GREEN NETWORK. THE TREES AND VEGETATION SURROUNDING THE SITE DO MAKE A CONTRIBUTION AND THESE SHALL BE RETAINED. WE DISAGREE THAT THE LANDSCAPE CHARACTER IS SUCH THAT DEVELOPMENT CANNOT BE WELL CONTAINED AND APPROPRIATE IN OTHER RESPECTS. THIS SITE PRESENTS AS MUCH OPPORTUNITY TO CONTRIBUTE TOWARDS SUSTAINABLE DEVELOPMENT AS ANY OF THE OTHER SITES IDENTIFIED AS POTENTIAL GREENFIELD ALLOCATIONS.

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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

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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

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

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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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On behalf of:

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

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

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

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

Explanation

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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

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

Explanation

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

Supporting Info
Email

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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: 01711 Response Ref: ANON-KU2U-GT29-D

Supporting Info Yes

Name Holder Planning

Email robin@holderplanning.co.uk

Response Type Agent / Consultant

On behalf of: BDW Trading Ltd

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 Not Answered

Frogston Road East

Landscape & Visual Appraisal



April 2018

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1 Introduction

Purpose of Report

- 1.1 This report sets out a Landscape and Visual Appraisal (LVA) of a proposed residential development (herein called the ‘Proposed Development’) on land south of Frogston Road East and immediately west of the consented Broomhills development.
- 1.2 In the context of the City of Edinburgh Local Development Plan, the Site was considered in the Main Issues Report (2016), the overall assessment of which concluded that *“development would affect the landscape setting of the city, would not enable suitable green boundaries to be formed and could not be integrated or be in keeping with the character of the existing settlement.”* This report seeks to investigate this conclusion by appraising the potential impacts of potential development on the setting of Edinburgh and exploring the possibility of formulating a desirable framework for development that could offset any potential impacts.
- 1.3 In working towards this, the objectives of the assessment are to:
 - Review the landscape policy framework in order to identify key landscape design aims;
 - Describe and evaluate the landscape and visual amenity of the site and surrounding area which is likely to be affected by the proposed development;
 - Identify mitigation measures which could be implemented in order to avoid, reduce or remedy any adverse effects;
 - Identify enhancements to the landscape that could be incorporated into the design of the Proposed Development and present these in a Landscape Framework plan; and
 - Appraise the likely landscape and visual effects of the Proposed Development.
- 1.4 This LVA has been undertaken by an experienced Chartered Member of the Landscape Institute (CMLI) and the approach taken to analyse the landscape and assess likely effects are similar to those undertaken for a typical Landscape and Visual Impact Assessment (LVIA). To this end, the methodology is based on the *Guidelines for Landscape and Visual Impact Assessment*, version 3 (produced by the Landscape Institute and the Institute of Environmental Management and Assessment 2013).

Structure of Report

- 1.5 To inform the design process, this report sets out a detailed understanding of the site and its surrounding landscape and how mitigation could be designed to minimise any landscape and visual effects. This is presented through the following sections:

Section 1: **Introduction** – purpose of report and overview of landscape planning policies relevant to the Proposed Development.

- Section 2: **Landscape & Visual Analysis** - description of the landscape and visual resource of the study area informed through desk study and field survey.
- Section 3: **Landscape Design Strategy** – summary of key issues and design aims and objectives.
- Section 4: **Viewpoint Appraisal** – exploration of landscape fit followed by an appraisal of likely landscape change and visual effects from a selection of representative viewpoints.
- Section 5: **Landscape Appraisal** - an appraisal of likely effects predicted on the landscape resource, landscape character and designated landscapes.
- Section 6: **Visual Appraisal** – an appraisal of likely effects predicted on the visual resource.
- Section 7: **Summary & Conclusion** - a summary of the overall landscape and visual effects of the Proposed Development and associated statement of significance.

Summary of Proposed Development

- 1.6 The Proposed Development would consist of the following:
- Residential housing of approximately 200 units;
 - SUDs area at the lowest part of the site (north-western portion);
 - Open green space to integrate the site into the landscape and provide a setting to the Proposed Development;
 - Integrated pedestrian links through the Site linking to both the neighbouring Broomhills development to the east (currently under construction), and to Mortonhall which accesses the City of Edinburgh Council core paths group 2.
 - Boundary woodland belts where appropriate to provide robust definition to the settlement extent.

Landscape Planning Context

- 1.7 The planning context of the Site is considered in relation to landscape and visual matters and relevant planning policies that would have a direct bearing on the Proposed Development have been identified. These include the following (underlined for emphasis):

Policy Des 3 – Incorporating and Enhancing Existing and Potential Features

“Planning permission will be granted for development where it is demonstrated that existing characteristics and features worthy of retention on the site and in the surrounding area, have been identified, incorporated and enhanced through its design”.

Policy DES 4 – Development Design – Impact on Setting

“Planning permission will be granted for development where it is demonstrated that it will have a positive impact on its surroundings, including the character of the wider townscape and landscape, and impact on existing views, having regard to:

- a) height and form*
- b) scale and proportions, including the spaces between buildings*
- c) position of buildings and other features on the site*
- d) materials and detailing*

Policy Des 9 Urban Edge Development

“Planning permission will only be granted for development on sites at the green belt boundary where it:

- a) conserves and enhances the landscape setting and special character of the city*
- b) promotes access to the surrounding countryside if appropriate*
- c) includes landscape improvement proposals that will strengthen the green belt boundary and contribute to the multi-functional green networks by improving amenity and enhance biodiversity.”*

This policy applies to all new development situated at the edge of the urban area. A clear demarcation between town and country is important to the defensibility of the Green Belt boundary and its objectives.”

Policy ENV 3 Listed Buildings - Setting

“Development within the curtilage or affecting the setting of a listed building will be permitted only if not detrimental to the architectural character, appearance or historic interest of the building, or its setting.”

Policy ENV 7 Historic Buildings and Designed Landscapes

“Development will only be permitted where there is no detrimental impact on the character of a site recorded in the Inventory of Gardens and Designed Landscapes, adverse effects on its setting or upon component features which contribute to its value. Elsewhere, adverse effects on the historic landscape features should be minimised. Restoration of Inventory sites and other historic landscape features is encouraged.”

Policy ENV 36 Conservation Areas - Development

“Development within a conservation area or affecting its setting will be permitted which:

- a) *preserves or enhances the special character or appearance of the conservation area and is consistent with the relevant conservation area character appraisal*
- b) *preserves trees, hedges, boundary walls, railings, paving and other features which contribute positively to the character of the area and*
- c) *demonstrates high standards of design and utilises materials appropriate to the historic environment.”*

Policy ENV 10 Development in the Green Belt and Countryside

“Within the Green Belt and Countryside shown on the Proposals Map, development will only be permitted where it meets one of the following criteria and would not detract from the landscape quality and/or rural character of the area:

- a) *for the purposes of agriculture, woodland and*
- b) *For the change of use of an existing building.....*
- c) *For development relating to existing use or building(s) such as extension to a site or building, ancillary development or intensification of the use, provided the proposal is appropriate in type in terms of existing use, of an appropriate scale, of high quality design and acceptable in terms of traffic impact.*
- d) *For replacement of an existing building....*

This policy is clarified in paragraph 181 which notes that:

“It is necessary to control the type and scale of development in the green belt to enable it to fulfil its important role in terms of landscape setting and countryside recreation as described in Part 1. However the purpose of the green belt is not to prevent development from happening. This policy sets out the circumstances in which development in the green belt can be supported.

The *“key test”* for proposals in the Green Belt is set out in paragraph 183 which states that *“all proposals in the green belt and Countryside areas will be to ensure that the development does not detract from the landscape quality and/or rural character of the area.”* The Council’s guidance ‘Development in the Countryside and Green Belt’ is referred to as providing more detailed advice on the matter.

Policy ENV 11 Special Landscape Areas

“Planning permission will not be granted for development which would have a significant adverse impact on the special character or qualities of the Special Landscape Areas shown on the Proposals Map.”

Policy ENV 12 Trees

“Development will not be permitted if likely to have a damaging impact on a tree protected by a Tree Preservation Order or on any other tree or woodland worthy of retention unless necessary for good arboricultural reasons. Where such permission is granted, replacement planting of appropriate species and numbers will be required to offset the loss to amenity.”

2 Landscape & Visual Analysis

Context

- 2.1 The Site is situated in the south of Edinburgh between Fairmilhead to the west and Burdiehouse to the east. The urban edge of Edinburgh extends to the northern and eastern boundaries of the Site. To the south-west the site is bound by a continuation of open agricultural land. There are numerous tree belts and several pylon lines crossing this agricultural land, and the Edinburgh bypass lies just over half a kilometre south of the Site.

Site and Surrounding Landscape

- 2.2 As illustrated in Figure 1 – Study Area, the site area is triangular in plan. It is bounded by Frogston Road East to the north; Broomhills Road to the south-east and a transmission line forms the south-western boundary of the site. The site generally slopes down to the south west with local levels dipping in the north-western corner of the Site. Levels range from 130 m to 125 m AOD.
- 2.3 The residential suburb of Kaimes is situated opposite the site, on the northern side of Frogston Road East, and the mixed use development of Broomhills is under construction on the eastern side of Broomhills Road. The south-western boundary of the site is defined by a steel lattice pylon line. A steadings development is situated just south of the site.
- 2.4 The urban form effectively wraps around the north, east and south of the site. The character of this urban form is strongly influenced by mature tree belts lining the roads. This aids the transition from town edge to the open and more rural character of the agricultural fields.
- 2.5 The overall character of the open fields to the south-west of the site area is influenced by: the numerous tree belts; the arresting views to the Pentland Hills; criss-crossing transmission lines, and the sound of traffic from the Edinburgh bypass.
- 2.6 Views northwards over the site are medium range, curtailed by roadside vegetation, tree planting and the housing. From the northern parts of the site, there are longer range views southwards over the site area to the south-west and west, with the Pentland Hills forming a distinctive focal point on the skyline, and tree belts and pylon lines in the middle ground. To the east, the tree belt along Broomhills Road and the housing immediately beyond limits views.



Looking eastwards from north-western corner of site towards Broomhills Road. Pylon line demarks the south-western boundary.



Looking west along northern boundary towards the tree belts with Mortonhall beyond these, and the Pentland Hills on horizon.



Looking northwards from southern corner of site on Broomhills Road. The vegetation and pylon line that demark the Site boundaries are clearly evident. Kaimes housing is visible beyond the northern boundary.

Landscape Character

- 2.7 The landscape character of the site area is categorised in two separate documents: the *Edinburgh Landscape Character Assessment* (prepared by LUC and Carol Anderson for City of

Edinburgh Council, 2010); and the *Lothians landscape character assessment* (document 91, prepared for Scottish Natural Heritage by ASH Consulting Group, 1998).

- 2.8 As illustrated in Figure 2 – Edinburgh Landscape Character Types, the site of the Proposed Development is located within the *Settled Farmland* Landscape Character Type (LCT) and the *Broomhills Settled Farmland Landscape* Character Area (LCA). The Scottish Natural Heritage (SNH) landscape character areas are illustrated on Figure 3 – SNH Lothians Landscape Character Areas. Since the City of Edinburgh landscape character document is the more recent of the two documents this has been used in this report.
- 2.9 The *Edinburgh Landscape Character Assessment* (CEC, 2010), notes the key characteristics of the wider *Settled Farmland* LCT as follows:
- *“Gently undulating landform;*
 - *Arable farmland, pasture and set aside;*
 - *Settlement extends to the perimeter of this landscape character type and piecemeal built development and communications links may be found within the landscape;*
 - *Woodland and field boundaries are likely to be remnant policies;*
 - *Lack of prominence due to low lying nature of the landscape;*
 - *Fragmented landscape with a mix of land uses.”* (page 227).
- 2.10 The *Broomhills Settled Farmland* LCA within which the site is located extends from Frogston Road in the north to Damhead holdings in the south, straddling the City Bypass. The site is situated in the north-eastern corner of this LCA (as illustrated in Figure 2).
- 2.11 The description of the *Broomhills Settled Farmland* LCA, refers to the character area as *“a mixture of arable fields and pasture with some hedgerows, stone walls and post and wire fencing”* (para 3.231). The assessment also notes the *“visual relationship”* of the LCA to the Pentland Hills and suggests that views from the City Bypass and the A702 towards the *Broomhills Settled Farmland* LCA are important.
- 2.12 The LCA description also mentions the Morton Mains conservation area which lies approximately ½ km to the west of the Proposed Development. The description notes that Morton House and Morton Mains are situated *“on a low knoll and are characterised by the associated trees”*.
- 2.13 The description also notes the three pylon lines cross though the character area en route to the electricity substation situated to the south east.
- 2.14 The overall assessment of the *Broomhills Settled Farmland* LCA is summarised as follows:

| Criteria | Influence |
|------------------------|-----------|
| Geology and Topography | Low |
| Land cover | Low |
| Cultural heritage | Low |
| Settlement | Low |
| Prominence | Medium |
| Receptors | High |
| Landscape condition | Medium |

- 2.15 Figure 2 also illustrates the other Landscape Character Types within the study area. To the east of the Proposed Development the *Rolling Farmland* LCT abuts the boundary of the site. Since the Edinburgh Landscape Character document was produced in 2010 a mixed use development has been consented in the Broomhills area neighbouring the site. The consented scheme is under construction and will be urban in character with a central green space on the high point of Broomhills when completed. This will result in the main body of the Rolling Farmland LCA being east of Burdiehouse Road and the A701.
- 2.16 To the west and north-west of the Proposed Development lies the *Policy Landscape* LCT associated with Mortonhall (in the north-west) and Morton House (to the west). The landscape character of this LCT is informed by the mature woodland and tree belts around pastoral fields, and the historic and cultural connections.
- 2.17 There may be potential for direct intervisibility between the Proposed Development and more distant Prominent Hills LCTs (approximately 1 km from the Proposed Development) as well as the Pentland Flanks LCT (almost 2 km from the Proposed Development).

Landscape Designations

- 2.18 As illustrated in Figure 4 (Landscape Designations), the study area is situated within the Green Belt and the north-western corner of the Proposed Development is adjacent to the *Braid Hills, Liberton, Mortonhall* Special Landscape Area (SLA) which includes the *Morton Mains* conservation area. There are three further SLAs within the Study Area. There are also three Gardens and Designed Landscapes (GDLs) which encroach into the edge of the 3 km study area.
- 2.19 The Green Belt is a landscape planning designation. As described in Section 1, the purpose of the designation is to ensure that the ‘setting’ and ‘rural character’ of the edge of the settlement is maintained.
- 2.20 SLA’s are designated for their high landscape quality and as noted in Section 1, “*Planning permission will not be granted for development which would have a significant adverse impact on the special character or qualities of the Special Landscape Areas shown on the Proposals Map.*”
- 2.21 The City of Edinburgh Council has prepared a Statement of Importance for each SLA which sets out the ‘essential qualities’ and ‘characteristics’ of the SLA and outlines the potential for enhancement.

2.22 The four SLAs within the Study Area of the Proposed Development are: the *Briad, Liberton, Mortonhall* SLA; the *Pentlands* SLA; *The Drum* SLA, and *Craigmillar Castle* SLA. The following table notes the approximate distance to the Proposed Development Site and summarises the key qualities of these SLAs:

| DESIGNATION | DISTANCE TO SITE | DESCRIPTION OF 'ESSENTIAL QUALITIES' |
|--|--|--|
| <i>Briad, Liberton, Mortonhall</i> SLA | Approx. 10 m at closest point between the SE corner of the SLA and the NW corner of the Site | <ul style="list-style-type: none"> • Blackford Hill, the Braid Hills and their environs form a prominent skyline on the southern edge of Edinburgh. • These hills and the prominent skyline contributes to the setting and identity of the city. • The hills and their environs make visual and physical connections to the wider countryside to the south of Edinburgh. • The landscape contributes to the character of adjacent residential neighbourhoods. • The landscape of this SLA serves as a landmark in views from the main hills encircling the city. • The landform of the hills and semi-natural vegetation, wooded valley and parkland planting at Mortonhall contribute to the high scenic quality of the SLA. • The rich cultural heritage of the hills. • The sense of '<i>naturalness</i>' and '<i>tranquility</i>' afforded by the landscape of the SLA in '<i>close proximity to the urban core</i>'. <p>(page 103, <i>Review of Local Landscape Designations</i>, prepared for the City of Edinburgh Council by Land Use Consultants, 2010)</p> |
| <i>Pentland Hills</i> SLA | Approx. 1.8 km to NE boundary of the SLA | <ul style="list-style-type: none"> • The Pentland Hills form a dramatic backdrop to Edinburgh. • One of the most prominent features associated with Edinburgh. • Provide a unique setting and containment to Edinburgh. • Historic associations with field patterns in the west of the SLA. • Water courses that feed man-made reservoirs. • Raised bog at Bonaly Common. • Prominent crags and scree slopes at Caerketton. • The hill range offers a sense of isolation. • Several of the peaks (Allermuir Hill and Caerketton Hill) afford panoramic views. • Rich in cultural influence. • Recreation and 'enjoyment' form a significant element of the landscape. |
| <i>The Drum</i> SLA | Approx. 2.5 km to western boundary of the SLA | <ul style="list-style-type: none"> • Woodland setting for the A listed Drum House which is a Palladian style mansion designed by William Adam. • Policy landscape characteristic of Estates on the periphery of Edinburgh. |
| <i>Craigmillar Castle</i> SLA | Approx. 1.8 km | <ul style="list-style-type: none"> • Designed landscape - wooded parkland setting on a strategic, low hill. |

| | | |
|--|--|--|
| | | <ul style="list-style-type: none"> • The Castle and woodland setting form ‘key elements’ in views southwards from Holyrood Park. • Elevated position of the Castle affords panoramic views over the City. • Historic significance and association with the Scottish royal family. |
|--|--|--|

2.23 In respect of Gardens and Designed Landscapes (GDLs), the policy guidance (as noted in Section 1) states that there must be no detrimental impact on the character of a GDL in order for the development to be permitted. There are three GDLs within the Study Area. All three are over 2.5 km distance from the Proposed Development.

2.24 Given the distance and the intervening urban form between the GDLs and the Proposed Development, it is considered that there is no possibility of the Proposed Development influencing these GDLs, therefore the GDLs are not appraised any further this report.

Core Paths

2.25 Figure 5 illustrates that the Core Paths Group 2 set of paths are at a distance of over ½ m from the Proposed Development. Local paths through Mortonhall and Broomhills connect to these this Core Path Group, and there is an opportunity for footpath links within the Proposed Development to connect into these.

Historic Designations and Listed Buildings

2.26 There are several designations relating to historic heritage (as illustrated in Figure 6), and numerous listed buildings (Figure 7), within the study area. The intervening urban form would limit the potential impact of the Proposed Development on most of the historic designations and listed buildings. However, *Morton Mains* Conservation Area which lies some 500 m due west of the Proposed Development, and the listed *Morton House Belvedere*, and *Morton House, Walled Garden, Garage and Well* would potentially experience intervisibility with the Proposed Development.

2.27 City of Edinburgh Council highlights the importance of the following points in underpinning the character of the *Morton Mains* conservation area:

- “the significance of the local topography and landscape to the form and setting of the conservation area”;
- “the vernacular and rural nature of the farm buildings contrasting with the classical appearance of Morton House”, and
- “the extensive views out to the surrounding countryside, mature trees and woodland as a key feature”.

http://www.edinburgh.gov.uk/directory_record/377068/morton_mains_conservation_area

- 2.28 Morton House and associated Walled Garden, Garage and Well are A listed. Morton House is listed for the style of building. It dates to the 18th Century or is a reconstruction of an earlier structure which has been extended and ‘refronted’ in the early 19th century. The reasons for listing apply directly to the architectural aspects of the buildings. The setting of the building and associated structures relates to the Morton Mains conservation area, in particular the local undulating topography and the mature trees in the vicinity.
- 2.29 Morton House Belvedere is a A listed tower dating back to the early 18th century. The 2-storey rectangular plan tower is listed for its architectural merit and the ‘Statement of Special Interest’ notes that the belvedere tower is “*unusual and intact*” having been “*built on a rocky outcrop marking the highest point of the grounds of Morton House and offering extensive panoramic views of the surrounding land*”. However, the upper floor and staircase were removed for safety in the early 20th century. Currently the tower is set within a small field surrounded by mature trees.

Viewpoint Selection

- 2.30 Several viewpoints have been carefully selected as those which are sensitive to change and where open views towards the site are potentially currently experienced. The locations have been selected to demonstrate the worst case scenario from key sensitive receptors and in identifying these, a detailed analysis of the surrounding landscape has been undertaken to establish the visibility of the site.
- 2.31 These viewpoints are also used to help inform the detailed design of the Proposed Development, the following seven viewpoints (see Figure 10) have been identified to explore how any adverse effects can be minimised and opportunities for enhancement incorporated into the iterative process of design evolution.

| VP No. | VP Name/Location | Key Receptors | Approx. Distance & Direction to Site |
|--------|---|---|--------------------------------------|
| 1 | Broomhill Cottages, near the southern corner of the Site. | Broomhills Road. Residences. Local landscape character. | 1 m NNW |
| 2 | Frogston Road Junction with Broomhills Road. | Frogston Road East & Broomhills Rd. Local landscape character. | 0 m SW |
| 3 | Klondyke Junction, on road to Mortonhall. | Frogston Road East. Local landscape character. Braid, Liberton, Mortonhall SLA. | 50 m SE |

| | | | |
|---|--|---|------------|
| 4 | The Loan, on elevated section of local road. | The Loan. Local landscape character. | 1.25 km NW |
| 5 | Morton House, on the western edge of the access road. | Morton Mains conservation area. Setting of Morton House. Local landscape character. Braid, Liberton, Mortonhall SLA. | 1.2 km W |
| 6 | Braid Hills, from a high point within the hills with potential view of Site. | Prominent Hills LCT. Braid, Liberton, Mortonhall SLA | 2.1 km SE |
| 7 | Caerketton Hill, east of the summit to be as close as possible to Site from elevated area. | Pentland Hills LCT. Pentland Hills SLA. Setting of Edinburgh. | 3.15 km NE |

3 Landscape Design Strategy

Key Issues

3.1 On review of the Policy Context (Section 1) and the results of the Landscape & Visual Analysis (Section 2), the following key issues have been identified:

1. The site is within the Green Belt and the setting of the city requires careful consideration to avoid unacceptable adverse landscape effects.
2. The site is located on open sloping ground and is directly bounded by urban form to the north and east, and the triangular plan of the site is such that it 'rounds off' the urban edge.
3. The open spaces within the city are prominent in elevated views from the Pentland Hills. These create a visual connection between Arthur's Seat and the Braid Hills and Mortonhall, linking to the farmland on the southern edge of Edinburgh. This is an important element of the setting to the City.
4. There is good network of local footpaths linking through the Broomhills development to Mortonhall. This provides an opportunity to connect with this local network of footpaths.
5. Views of the site are limited to the immediate boundaries and from the elevated areas of land including the Pentland Hills, the Loan, and from a short section of the western

boundary of the Morton Mains conservation area and the Braid, Liberton, Mortonhall SLA.

6. There is a pylon line which defines the south-western boundary of the site. The Proposed Development would be required to be set back at least 20 m from this and consideration is required to create a safe and positive living environment as well as creating a visually robust edge to built form.
7. The detailed design of the Proposed Development must not significantly and adversely affect local landscape character.
8. The detailed design of the Proposed Development must not have a significant adverse effect on the 'essential qualities' of the Braid, Liberton, Mortonhall SLA or the Pentland Hills SLA.
9. The detailed design of the Proposed Development must not have a significant adverse effect on the setting of Edinburgh.
10. The detailed design of the Proposed Development must be of high quality, incorporate public open space, enhance public access and incorporate environmental improvements for residents, and for the setting of the settlement.

Design Aims

- 3.2 In the context of other technical and environmental constraints, objectives to minimise the landscape and visual effects of the proposed development are a primary considerations. A review of relevant policy, the landscape character assessment, and the findings of a field survey have all been considered in the ongoing process of project design. Within this, the following landscape design aims have been adopted and incorporated into the Landscape Framework Plan for the Site (see Figure 8). A photomontage, as illustrated in Figure 9, has also been prepared to illustrate the potential 'landscape fit' of the Proposed Development taking into account the following design aims.

Design Aim 1: Incorporate woodland planting along the south-western a boundary to screen the pylon line from the Proposed Development and create a positive living environment, as well as providing robust containment of the urban edge.

Design Aim 2: Integrate the Proposed Development within its setting by carefully locating a structural framework of planting and open space along boundaries and within the site.

Design Aim 3: Incorporate amenity open spaces in south-eastern corner of the Site to protect the visual amenity of the existing cottages on Broomhills Road, and to generally soften the visual impact of built development and provide for recreational and nature conservation benefits.

Design Aim 4: Maintain and reinforce the existing tree belt along Frogston Road East to ensure a high quality frontage that maintains the existing local landscape character.

Design Aim 5: Enhance the existing footpath routes in and around site that connect with the surrounding path network.

Design Aim 6: Create a high quality landscape design associated with the SUDS area in the north-western corner of the Site to minimise potential landscape effects on the entrance to Mortonhall and the Braids, Liberton, Mortonhall SLA.

Design Aim 7: Protect the setting of the Morton Mains conservation area by ensuring that a tree belt in keeping with the local character screens the Proposed Development from the west.

3.3 A landscape framework that takes these design aims into account is illustrated in Figure 8. This demonstrates locations of open space and tree belts within the Site which would create a positive living environment and minimise landscape and visual effects.

3.4 The resulting fit within the landscape is illustrated in the photomontage on Figure 9. This demonstrates the layering effect of the tree belts which would reduce visual effects and aid integration, as does the shape of the Site, which smooths out the urban edge.

4 Viewpoint Assessment

4.1 The viewpoints have been selected as those which are sensitive to change and where open views (or as open as possible) towards the site are potentially currently experienced. The locations have been carefully selected to demonstrate the worst case scenario and in identifying these, a detailed analysis of the surrounding landscape was undertaken to establish the visibility of the site.

4.2 In considering these viewpoints, it should be noted that overall the extent of visibility of the site within the local landscape is relatively limited, and as such several of the key viewpoints are located in close proximity to the site. In general the site benefits from a good degree of local screening from intervening rising ground, woodland cover and areas of built development.

4.3 The following section provides an overview of the likely landscape and visual effects predicted from each of the six Key Viewpoints illustrated in Figures 11 to 14.

| VIEWPOINT | 1. BROOMHILL COTTAGES |
|--------------------------|---|
| <i>Landscape Effects</i> | The landscape character from this vantage point is informed by the site area which would be altered by the Proposed Development. The proposed mitigation planting as well as carefully located open space in the southern |

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| | corner of the site would minimise the effects on landscape character, although the rural nature of the site would transform to that of urban edge. |
| <i>Visual Effects</i> | <p>The planned open space opposite the Broomhills Cottages would ensure that the Proposed Development is set back from Broomhills Road, reducing the overall effect on the visual amenity of residents. Before mitigation planting matures residents, road users and walkers would experience views of development extending across a relatively large part of the Proposed Development. However, as tree planting matures, the effect would be one of a village green defined by trees.</p> <p>The location of the open space sets the Proposed Development at a distance from the existing cottages. As planting matures, most of the Proposed Development would be filtered in this view.</p> |

| VIEWPOINT | 2. FROGSTON ROAD JUNCTION |
|--------------------------|---|
| <i>Landscape Effects</i> | <p>Before mitigation planting matures along the northern boundary, some built development across the northern parts of the site would be visible in close proximity. This would introduce built development into open countryside and contrast with the sense of rural character of the undeveloped foreground. It would also detract from the backdrop of the Pentland Hills in this view.</p> <p>As woodland planting matures along the northern boundary, all of the Proposed Development would be screened from view. This would conserve and enhance the local character of the roads and prevent urban influence.</p> |
| <i>Visual Effects</i> | <p>During the early phase of the development, road users would experience filtered views of built development extending across a relatively large part of the view.</p> <p>Once the woodland planting along the northern boundary matures, the view would be one of a continuous woodland block at the Frogston road/Broomhills road junction which would prevent views to the urban form. To a small extent this would also prevent enjoyment of the longer range to the Pentland Hills from a relatively short section of road.</p> |

| VIEWPOINT | 3. KLONDYKE JUNCTION |
|--------------------------|---|
| <i>Landscape Effects</i> | <p>The trees lining Frogston Road East filter the Site in this view. Beyond the trees the rural character of the field prevails, although this is influenced by the pylon line cutting through it. Until the mitigation planting along the south-western boundary and associated with the SUDS matures, there may be some filtered views to urban form. However, this would be set back beyond the SUDS area and further filtered by the associated planting.</p> <p>Once the mitigation planting matures there are unlikely to be any views to built form of the Proposed Development. The additional woodland proposed at the boundary of the site, and reinforcing the trees along the frontage to</p> |

| | |
|-----------------------|--|
| | <p>Frogston Road East would help to conserve and enhance the local character of the landscape.</p> <p>This viewpoint illustrates the view from the nearest point between the Braids, Liberton, Mortonhall SLA, and the Proposed Development. The mitigation planting combined with the location of the SUDS area, which effectively sets the built form of the Proposed Development further away from this viewpoint, would ensure that the Proposed Development would have little to no influence on the essential qualities of the SLA in this locality.</p> |
| <i>Visual Effects</i> | <p>The Proposed Development would bring housing closer to this vantage point, although most of the development would be screened from view by the mitigation planting once it matures.</p> <p>The character of the tree-lined housing would be in keeping with the local character of housing along Frogston Road East, although the Proposed Development would increase the area of housing a little.</p> |

| VIEWPOINT | 4. THE LOAN |
|--------------------------|---|
| <i>Landscape Effects</i> | <p>Whilst nearly all of the Proposed Development would be screened from view, it is possible that some built form might be visible beyond the intervening Broomhills ridgeline which is presently under construction which would ensure that the Proposed Development would have little to no influence on the rural nature of the local landscape character.</p> <p>Once mitigation planting throughout the site has established, no development would be visible and the addition of woodland would conserve and enhance the local landscape.</p> |
| <i>Visual Effects</i> | <p>Any built form of the Proposed Development that might be visible above the intervening ridgeline and the Broomhills development, would tend to occupy a small proportion of the horizontal view and it would not be clear from this distance whether the built form relates to Broomhills or the Proposed Development. With mitigation planting, no development would be visible although and there would not be any perceptible change to the visual amenity of users of the local road.</p> |

| VIEWPOINT | 5. MORTON HOUSE |
|--------------------------|---|
| <i>Landscape Effects</i> | <p>This vantage point is from the south-eastern edge of the Braid, Liberton, Mortonhall SLA and the Morton Mains conservation area. The view looks over sloping fields towards a treed shallow valley, with the urban edge of Edinburgh visible in the near to far background directly beyond. The site lies between the treed shallow valley and the urban edge of the City.</p> <p>To the right of the view, the rural character of the countryside is more dominant. Mature tree belts and pylon lines transect this part of the countryside, and there are views of the Lammermuir Hills on the horizon. To the left of the view, substantial woodland limits the view, although there is a</p> |

| | |
|-----------------------|---|
| | <p>glimpse of the coast and North Berwick Law in the far distance.</p> <p>The introduction of Proposed Development with the mitigation planting suggested would limit the intervisibility of the built form of the Proposed Development and the designated landscape. The tree belts proposed as part of the mitigation planting would substantiate the local tree belts and enhance the existing local landscape character.</p> <p>Until the tree belt on the south-western boundary of the Site matures, there would be views to the built form of the Proposed Development. To a small degree this would detract from the rural setting of Mortonhall Mains conservation area. The limiting factors to potential effects are the distance to the Proposed Development and the position of the proposed built form in relation to Edinburgh, that is, the site area is in the same part of the view as existing urban edge.</p> <p>The Proposed Development would have little effect on the essential qualities of the Braid, Liberton, Mortonhall SLA since it relates to the part of the view within which the urban edge of Edinburgh and it lies beyond the valley and related belt of trees..</p> <p>It is likely that the mitigation planting would screen any development from view over time, and the proposed trees would relate well to the local landscape character, integrating the Proposed Development and creating a more robust urban edge in this view.</p> |
| <i>Visual Effects</i> | <p>In the short term, the Proposed Development would result in a slight increase in the extent of visible development and this would bring development closer to the viewer. As the mitigation planting matures, the Proposed Development would become integrated into the view, and the effect of the development would soften. Once the mitigation planting matures, it is unlikely that there would be views of the built form of the development. In either scenario, the important long range views across open countryside towards the Lammermuir Hills would remain largely unaffected.</p> |

| VIEWPOINT | 6. BRAID HILLS |
|--------------------------|---|
| <i>Landscape Effects</i> | <p>The vantage point is from an elevated location in the Braid Hills. It demonstrates that the Proposed Development is likely to be screened from view by the tree belts visible in the middle distance.</p> <p>The screening effect of intervening tree belts would be further consolidated by mitigation planting throughout the site once this has established. There would be little effect on the landscape character given the lack of intervisibility from most of this LCA.</p> |
| <i>Visual Effects</i> | <p>The Proposed Development would not be visible in this view, therefore there would be no change to the visual amenity.</p> |

| VIEWPOINT | 7. CAERKETTON HILL (PENTLAND HILLS) |
|--------------------------|---|
| <i>Landscape Effects</i> | <p>The panoramic view from the upper slopes of Caerketton Hill extends across over Edinburgh to the Firth of Forth and the coastline of Fife beyond. The view centres on the site with Arthur’s Seat in the left (north) of the view and the Lammermuirs at the right (west). The countryside edge between the built form of the City and the hilltop view is characterised by tree belts and fields which are transected by pylon lines and the City Bypass.</p> <p>Proposed Development would be visible obliquely in the panoramic view. From this vantage point the triangular shape of the site would soften the edge of Edinburgh and relate well to the Kaimes suburb immediately north and the Broomhills development to the east. The mitigation planting would ensure that the built form of the proposed development is filtered by layers of tree planting which would create a softer edge than the one existing (refer to Figure 9 – Landscape Fit).</p> <p>The Proposed Development forms a small part of the overall panoramic view and the mitigation planting adds further tree belts into the landscape, substantiating the wooded cover in the local landscape. Overall, the landscape design of the Proposed Development would help to ‘smooth out’ the urban edge of the City at this location and the additional mitigation tree planting would help to integrate the Proposed Development into the landscape.</p> |
| <i>Visual Effects</i> | <p>The Proposed Development would result in a slight increase in the extent of urban development in this view, although the mitigation planting (as per the proposed landscape framework) would ensure that the urban edge is softer and more integrated from this elevated location.</p> |

5 Landscape Assessment

5.1 The Viewpoint Assessment in section 4 notes the landscape effects on the main landscape receptors within the study area. This section further explores the effects on the receiving LCA and the landscape receptors that have potential to be impacted significantly, namely the Broomhills Settled Farmland LCA, the Braid, Liberton, Mortonhall SLA, the Pentland Hills SLA, and the Mortonhall Mains conservation area.

Broomhills Settled Farmland LCA

5.2 The site of the Proposed Development is located in the north-eastern corner of the LCA, neighbouring the urban edge of the city and immediately north of three pylon lines. The City Bypass is situated just over 500m to the south of the site.

5.3 From most parts of this LCA, the Proposed Development would be screened from view by intervening built development, woodland blocks and/or undulating topography. From the small parts of the landscape where it would be visible, any increase in the overall proportion

of visible built development would be very small. Although there would be some encroachment into the undeveloped agricultural land, the Proposed Development repeats the settlement pattern that is characteristic in the local area, providing a high quality landscaped frontage and well-designed built form.

- 5.4 The addition to tree planting proposed within the Proposed Development area, the mitigation boundary planting along the south-western boundary would establish a permanent robust wooded edge to Edinburgh in this locality, and as such would help to integrate the Proposed Development within its setting. As noted in the viewpoint assessment, this would enhance the local landscape from some locations as woodland blocks and belts are a strong landscape feature of the local LCA.

Braids, Liberton, Mortonhall SLA

- 5.5 Although the south-eastern fringes of the SLA are in close proximity to the site, nearly all of the designation is outside of any potential visibility of the Proposed Development. It is possible that without any tree planting, the setting of the SLA along the local road to the east of the site might be affected by the introduction of nearby visible development. With mitigation planting however, the Proposed Development would be screened from view and the introduction of woodland would conserve and enhance the setting of the designation.

Pentland Hills SLA

- 5.6 The Proposed Development would form a very small element of the panoramic landscape visible from this SLA. The shape of the site and the proposed mitigation planting would soften the existing lines of the urban edge, and integrate the Proposed Development into the area. The additional woodland planting associated with the Proposed Development would reflect the character of the local landscape. Thus, the Proposed Development would be filtered in the view and the introduction of woodland would conserve and enhance the setting of the designation.

Mortonhall Mains Conservation Area

- 5.7 The Proposed Development would be visible from a small part of the eastern boundary of the conservation area where there would be an intervening tree belt, albeit on lower land. The site would be visible beyond this tree belt, however the built form of the Proposed Development would be screened by mitigation planting on the south-western boundary of the site.
- 5.8 The additional tree planting on the boundary of the site would substantiate the existing tree planting within the local landscape and further screen the existing urban edge of Edinburgh visible in this location. Therefore, the integrity of the setting of the conservation area would remain intact.

6 Visual Assessment

- 6.1 The Visual Assessment focusses on the visual receptors that have potential to be impacted significantly only.

Nearby Dwellings

- 6.2 There are several dwellings at the southern corner of the Proposed Development that would potentially have direct views into the site. However, the location of the open space and associated planting would ensure that the built form of the development would be filtered and set back from the dwellings. This would minimise visual effects and help to maintain a setting for the existing residences. Although the view would no longer be an undeveloped rural outlook, quality of building design with trees and open spaces within the Proposed Development would help to soften the impact, and the resulting character would be that of a village green.

Pentland Hills

- 6.3 Although there is potential for views of the Proposed Development from the Pentland Hills, these would be panoramic and the site would form a very small element within the view. The triangular shape of the site, and its location, neighbouring Broomhills and Kaimes, would soften the existing urban edge of the City. The Proposed Development would only slightly increase the degree of built development experienced. The mitigation planting would further minimise the visual impact by conserving and enhancing the character of the landscape in the vicinity of the Proposed Development as visible from the elevated vantage point.

Surrounding Footpaths & Roads

- 6.4 Some of the roads and footpaths that surround the site have direct open views into and over the site area. The visual impact on these would be to reduce the openness of the site and open views, particularly to the Pentland Hills from a section of Frogston Road East. Mitigation planting of trees within the Proposed Development, along the boundaries, and strategically placed open space would ensure that the visual effect of the built form is minimised.
- 6.5 The City Bypass is situated some 500 m to the south of the Proposed Development. The field survey has verified that the intervening undulations in landform combined with the tree planting as well as roadside planting and embankments, would screen views to the Proposed Development.

7 Summary of Effects

7.1 This LVA has demonstrated that:

- The introduction of the Proposed Development would result in some localised adverse effects on the character of the surrounding landscape. Built development would encroach into undeveloped farmland and this would detract from the experience of rural quality to a degree. However, the landscapes effects on sensitive receptors (SLAs and conservation area) would not be significant.
- The Key Viewpoints have been used to understand the potential effects on the setting of the city of Edinburgh. The site is shaped in such a way as to effectively ‘round off’ the urban edge, and the mitigation planting would create a stronger, more robust woodland edge than that existing. This combined with the proposed tree planting within the main body of the Proposed Development would result in a softening of the urban edge with minimal effect on the setting of the City.
- Once mitigation planting matures, this would conserve and enhance the local landscape, particularly to the south and west of the site where the Proposed Development would be screened from view.
- Before mitigation planting matures, the views of a small number of walkers, residents and road users in close proximity to the site would be adversely affected. The proposed Landscape Framework would ensure that visual effects are minimised.
- Once the proposed woodland planting has established, any nearby receptors to the west of the site would not experience any views of the Proposed Development.

Statement of Significance

7.2 In response to the iterative design process, the following design aims have been incorporated to minimise any adverse landscape and visual effects:

Design Aim 1: Incorporate woodland planting along the south-western a boundary to screen the pylon line from the Proposed Development and create a positive living environment, as well as providing robust containment of the urban edge.

Design Aim 2: Integrate the Proposed Development within its setting by carefully locating a structural framework of planting and open space along boundaries and within the site.

Design Aim 3: Incorporate amenity open spaces in south-eastern corner of the site to protect the visual amenity of the existing cottages on Broomhills Road, and to generally soften the visual impact of built development and provide for recreational and nature conservation benefits.

Design Aim 4: Maintain and reinforce the existing tree belt along Frogston Road West to ensure a high quality frontage that maintains the existing local landscape character.

Design Aim 5: Enhance the existing footpath routes in and around site that connect with the surrounding path network.

Design Aim 6: Create a high quality landscape design associated with the SUDS area in the north-western corner of the Site to minimise potential landscape effects on the entrance to Mortonhall and the Braids, Liberton, Mortonhall SLA.

Design Aim 7: Protect the setting of the Morton Mains conservation area by ensuring that a tree belt in keeping with the local character screens the Proposed Development from the west.

7.3 In taking forward these aims, this LVA has identified that:

- The development is in scale with the landscape setting and the surrounding fabric of trees and woodlands would remain intact and with mitigation planting, strengthened over time;
- From nearly all parts of the landscape within the study area, the existing pattern of trees and woodland blocks combined with the proposed mitigation planting, and the extensive areas of built development to the north and east, would screen the development from most receptors;
- Where views would be experienced from some areas in close proximity to the site, most of the built form of the development would be screened/ filtered from view and where visible, the additional changes within an existing context of pockets of residential development set amongst woodland blocks are relatively limited; and
- The development would relate to the urban fringe character and form a stronger, yet softer edge to the City.

7.4 In summary, this LVA concludes that in principle, the Proposed Development is broadly acceptable in landscape and visual terms. Proposals for robust landscape planting and open space will ensure accordance with the design aims to enhance the countryside and rural environment, the landscape setting of the City, and the open space generally, as well as to ensure careful integration of new building into the landscape.

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Submitted to **Choices for City Plan 2030**

Submitted on **2020-04-30 10:33:07**

Your information and data

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3. If you do not have an email address What is your address?

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4 I am responding as

Agent / Consultant

5 IF you are responding on behalf of an organisation or an other individual, what is their name?

Agent on behalf of:

BDW Trading Ltd

6 I agree to my response being published to this consultation.

Yes

Choice 1 - Making Edinburgh a sustainable, active and connected city

1A 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?

Not Answered

Explain why:

One could not disagree with such an ambition, but further detail is required to comment meaningfully.

1B 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?

Not Answered

Explain why:

We support the principle of providing green and blue infrastructure where practical and affordable.

In terms of SUDS, there have been occasions where Local Authority requests and Scottish Water's vesting requirements do not align— particularly with regard to the level of surface water storage. Requirements for drainage infrastructure must be based on sound technical solutions and agreed in line with the requirements of SEPA and Scottish Water to allow vesting. Given the requirement at question 1H for green spaces to have management arrangements in place, we must be able to design SUDs that they can be fully vested too.

Green and blue infrastructure can be difficult to deliver on smaller and brownfield sites and where there need to be trade-offs to achieve density requirements. It would be helpful if appropriately designed SUDS can be accounted for within open space requirements. Obviously for the change of use of existing buildings it may be impossible to provide green and blue infrastructure and this should be reflected in any policy.

1C We want to identify areas that can be used for future water management to enable adaptation to climate change. Do you agree with this?

Not Answered

Explain why:

There is already detailed policy and guidance in respect to water management, taking account of climate change, and further information on what is proposed in order to allow meaningful comment.

1D 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

Explain why:

The current policy is not easily comprehensible and can be interpreted to be over-protective of poor quality open-space, potentially preventing positive change in the future. A number of currently identified open spaces could be more productively used by allowing development and this should be encouraged where appropriate, which will assist, for example in meeting challenging housing requirements within urban areas. That does not mean valuable open space needs to be lost.

1E 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?

Not Answered

Explain why:

We agree that major expansion of the city should be accessible to attractive parkland of appropriate scale. That can be provided within large areas of development. Care should be taken with how policies are framed, so they are not overly prescriptive. Smaller scale developments may not have space to accommodate large amounts of greenspace and may not be able to achieve accessibility to the "extra large green space". Obviously some parts of the city are better endowed with existing green space than others, use of which related to new development may be more appropriate than creating overly large new spaces. It should be recognised that the Council's objective of significantly raising housing density within new developments will, by necessity, mean that there will be less room for green space. There are not 'one size fits all' solutions here and policies should be drafted accordingly.

1F 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?

Not Answered

Explain why:

Yes but this should not be at the expense of identifying sufficient land to meet development requirements. The Council's aspiration to significantly increase the density of new development is perhaps in conflict with providing land for allotments. It of course needs to be recognised that the demand for allotments is mostly driven by people not having sufficient garden space to grow food. There is obviously a trade-off between providing high density urban environments and space for allotments.

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1G We want to identify space for additional cemetery provision, including the potential for green and woodland burials. Do you agree with this?

Not Answered

Explain why:

We obviously agree with the principle of having enough space for burials, but we caution against identifying such space in a plan, as landowners may not bring it forward for such use. We would suggest that the Council looks to land which it controls in the first instance, but otherwise we would recommend a criteria based policy to allow providers to identify the sites most fit for purpose.

1H 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?

Not Answered

Explain why:

Yes in principle. However, it is stated that the Council favours factoring on behalf of the private landowner(s) but will consider adoption should sufficient maintenance resources be made available. We do not support the latter approach.

Choice 2 - Improving the quality and density of development

2A 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.

Not Answered

Explain why:

It is important that the requirement "to demonstrate" is reasonable and proportionate. There are already various policies and guidance that require such

demonstration and it is not made clear what change is proposed, therefore it is not possible to comment meaningfully. Care should be taken not to require onerous submission requirements to add to the already heavy and expensive burden of documentation to be submitted with a planning application.

2B 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?

Not Answered

Explain why:

Barratt welcome the opportunity to maximise the efficient use of land and have developed bespoke products to achieve this in locations across the City. Indeed, some of our city centre developments achieve densities over 100 dwellings per hectare.

However, the prescriptive approach and blanket minimum density proposed will not be appropriate or possible in all locations across the authority area. The housetypes, layouts and storey heights required to achieve these densities will cause difficulties in achieving appropriate schemes in some locations. Considerations such as local heritage, landscape, topography, airport restrictions and of course market demand will make it difficult or unviable to deliver such densities.

High density schemes can only be achieved by employing certain housetypes, thereby narrowing the range and type of new homes delivered. This has the potential to cause more acute affordability issues in certain demographics and types of households, who in their search for appropriate accommodation would be forced to look outside of the authority area. This would cause out migration and encourage more commuting, contrary to the aspirations of the plan.

In addition, the application of some proposed policies elsewhere in 'Choices' would make it more difficult to achieve higher densities if it is to be calculated on a gross area basis e.g. provision of large open spaces and blue infrastructure.

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.

2C 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?

Not Answered

Explain why:

We support active travel and achieving good connectivity, and it appears to us that existing policies and guidance already achieve this. It is not explained what the proposed revisions will entail and it is therefore difficult to provide any meaningful comment on this statement.

2D 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?

Not Answered

Explain why:

Unfortunately there is not enough information provided to comment meaningfully on this aspiration. There will necessarily be trade-offs between the provision of open space and density, and in our view this should always be considered on a site by site basis, taking account of surrounding character and uses. Policies should therefore be criteria based and not overly prescriptive. Also, we are of the view that student accommodation should generally be treated no differently than residential development in respect to design and quality standards.

Choice 3 - Delivering carbon neutral buildings

2A 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?

Not Answered

Explain why:

Barratt is committed being the country's leading national sustainable housebuilder and have signed up to science-based targets for reducing carbon emissions. We have committed to reduce direct carbon emissions from our business operations (such as offices, sites, and show homes) by 29% by 2025 and will cut our indirect carbon emissions (such as those coming from our homes over their lifetime and from across our supply chain) by 11% by 2030. We have already worked hard to reduce our carbon emissions – since 2015 we have achieved a 22% fall in emissions with initiatives such as improving plant efficiency and rolling out energy efficient lighting.

Using modern methods of construction to build more energy efficient homes is a major part of reducing our this, but it is part of a wider and more holistic approach to an overall lower carbon operation incorporating site design, engineering solutions, our office operations and through our supply chain.

It is important that measures to reduce Carbon are brought in safely, efficiently and in the knowledge that they will make a real and lasting reduction to carbon emissions.

The Platinum standard of the build regulations is currently incomplete (i.e. the text under the sub headings in the current document is 'not currently defined' for all

sections except CO2 emissions), therefore it is not known what the rest of the standard will require. This is critical when looking at the overall design, functionality and efficiency of buildings. It is therefore very difficult to quantify the impact that the Platinum standard will have on the design, build program and cost of buildings. Moreover, it is not clear whether the required the supply chain and expertise to implement any additional measures is available.

Barratt will continue to work towards improving the efficiently and adapting our products to meet higher standards, but this must be through a rigorous design process to ensuring the efficiency, longevity and deliverability of any new designs.

The Government has responsibility for amending building regulations to ensure future sustainability. In our view it is critical that LDP policies should align with these, otherwise there is a significant risk that different Councils will have differing requirements. Housebuilders and their supply chains would find it almost impossible to work in such an adhoc and piecemeal policy context.

Choice 4 - Creating Place Briefs and supporting the use of Local Place Plans in our communities

4A 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?

Not Answered

Explain why:

Yes, but great care will be needed to ensure that participants are well-informed about constraints and opportunities, to avoid unrealistic expectations and outcomes. It will also be important to avoid delay to what already appears to be an overly-ambitious timetable for the delivery of housing. Moreover, it is strongly recommended that developers are involved in the process, to provide their expertise and experience.

4B 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?:

See answer to Q4A

Choice 5 - Delivering community infrastructure

5A 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?

Not Answered

Explain why:

Yes. However, care should be taken in assessing what is required and ensuring that the requirements for new infrastructure are properly justified, reasonable and proportionate.

5B 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?

Not Answered

Explain why:

Yes. However, we are concerned that the methodologies for assessing the need for facilities and infrastructure may be flawed. We have provided further comments on specific points under Q12B

5C 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?

Not Answered

Explain why:

Yes, although in response to Q12B we have indicated where we believe there are some incorrect accessibility conclusions in the Housing Study Site Assessments.

5D.1 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?

Not Answered

Explain why:

Yes, although it is not made clear if this will be any different to current policies. The requirement for any infrastructure must be properly justified and in accordance with the Government Circular

5D.2 We want to use cumulative contribution zones to determine infrastructure actions, costs and delivery mechanisms. Do you agree with this?

Not Answered

Explain why:

The Council's current cumulative methodology has been recently rejected by the Government. Further work by the Council is therefore needed to demonstrate that its approach to contributions meets the various tests in the Government Circular.

Also, we are of the view that all forms of development should be subject to planning gain requirements, including affordable housing.

5E 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?

Not Answered

Explain why:

We agree that statutory supplementary guidance should no longer be used, which is in any case not supported by the new Planning Act. In our view, it is crucial that all matters, including developer contributions, that have a significant implication for the viability and delivery of housing are included within the LDP and not within Action Programmes or non-statutory guidance. This approach allows for consultation and independent scrutiny, which must be the case for such important matters. We would also say that developer contribution amounts should be fixed at the level they are at when a planning application has been submitted, and not amended upwards thereafter.

Choice 6 - Creating places for people, not cars

6A 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?

Not Answered

Explain why:

Yes but the current methodology for assessing accessibility of public transport and active travel routes seem overly negative e.g. sites next to high frequency bus routes and/or with access to cycling and walking routes are not recognised as such on the basis of what appears to be flawed assessment or a lack of exploration of new opportunities. We accept that walking/cycling routes and public transport are necessary, and there should be more positive consideration of improving existing links or creating new ones.

6B 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?

Not Answered

Explain why:

Yes perhaps so long as the participation is well-informed and realistic. People still need cars for trips where public transport or active travel is not an option. It may be too easy for communities with existing good access to parking to seek that new development does not also benefit. It is our experience that where low levels of parking has been provided on some developments, it encourages inappropriate parking to the detriment of the amenity of the area, sometimes obstructing pedestrians and cyclists. We believe that a significant reduction in car parking standards may have a number of negative consequences, including providing for varying needs.

Choice 7 - Supporting the reduction in car use in Edinburgh

7A 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?

Not Answered

Explain why:

There is not enough information to agree or disagree. It fundamentally depends on how much parking is going to be made available. See answer to Q6B

7B 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?

Not Answered

Explain why:

7C 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?

Not Answered

Explain why:

Yes, but there is no indication of what this update will involve, so as to allow meaningful comment. Also, we could only support this if the anticipated transport infrastructure is in place. Otherwise, it would only be appropriate to future-proof sites for provision of the suggested facilities.

7D 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?

Not Answered

Explain why:

Yes but there is no detail to comment on.

Choice 8 - Delivering new walking and cycle routes

8A We want to update our policy on the Cycle and Footpath Network to provide criteria for identifying new routes. Do you agree with this?

Not Answered

Explain why:

Yes but no specific criteria are provided to comment on.

8B 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

8C 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?

Not Answered

Explain why:

Yes, so long as it is deliverable and the landowner has been consulted in advance.

Upload new cycle routes:

No file was uploaded

Choice 9 - Protecting against the loss of Edinburgh's homes to other uses

9A 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?

Not Answered

Explain why:

Yes we agree with consultation but disagree with control areas.

9B 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?

Not Answered

Explain why:

It depends on what the policy says. It is quite appropriate to change use from residential to other use in many circumstances. The policy must be sufficiently flexible to ensure that only genuinely harmful proposals are prevented.

Choice 10 - Ensuring the better use of land

10A. 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?

Not Answered

Explain why:

10B 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?

No

Explain why:

Such a policy is likely to be too prescriptive, and should have regard to surrounding character. We support the aim of achieving mixed uses but that consideration depends on the mix of uses surrounding the site. One should not consider student accommodation application sites in isolation.

10C 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

Explain why:

Choice 11 - Delivering more affordable homes

11A We want to amend our policy to increase the provision of affordable housing requirement from 25% to 35%. Do you agree with this approach?

No

Explain why:

Such a policy would not accord with Scottish Planning Policy paragraph 129, which states; "The level of affordable housing required a contribution within a market site should generally be no more than 25% of the total number of houses"

Barratt has built approximately 2,000 homes in the City of Edinburgh Local Authority area in the last 5 years. Of those approximately 570 were affordable. BDW have a further 1,780 homes with planning permission on both green and brownfield sites that have commenced work and 469 of these will be affordable.

BDW are committed to delivering a range of both market and affordable housing in Edinburgh, however does not support an increase in the affordable requirement from 25% to 35% for the following reasons:

- The LDP is being prepared under current legislation, with SPP is still in place as the extant National Policy, this states that the affordable housing requirement should be no more than 25%.
- Affordable housing demand is a result of historical undersupply across all tenures. Unless the whole housing requirement is planned for and met, affordability issues will perpetuate, regardless of the affordable target. In order to deal with a shortfall in affordability.

A plan that allocates a range and choice of housing sites is more likely to ensure delivery of the homes required to meet the needs of the population. A range of brownfield and greenfield sites, of varying sizes and in different locations, will allow the market to deliver the homes required meet housing need across all tenures within the plan period.

11B 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?

No

Explain why:

We support an approach that allows a broad range of type and tenure of homes to be included in the affordable proportion of homes in developments. Where a strict prescriptive approach to the proportion of different types is taken, this can have a negative impact on viability, delivery timescales and design.

The design guide should be produced in conjunction with the developer and not determined by the RSL. We do not support the representative mix, as we work with the RSL to meet its needs, which is 1, 2 & 3 bed properties regardless of what is being built on the private site. The further downside to a representative mix is that densities would reduce overall as the land-take for the affordable element would increase. HVNS is wide ranging and we only support its broad principles, as not all of its criteria can be met.

Choice 12 - Building our new homes and infrastructure

12A Which option do you support?

Not Answered

Explain why you support that option, or why haven't chosen an option:

We do not support any of the options because none of them is likely to provide the context to deliver sufficient housing to meet Edinburgh's housing need and demand until 2032. However, we could support an alternative to Option 3 (Blended Approach), which allocates much more land for housing than currently proposed.

Our response to question 12A is structured to reflect the underlying methodology of establishing how much housing land is required to meet future requirements, following Scottish Planning Policy i.e.

1. Establish housing need and demand i.e. from HNDA 2
2. Establish the Housing Supply Target (HST) to properly reflect HNDA 2
3. Establish the Housing Land Requirement by adding 10 - 20% to the HST
4. Estimate the amount of housing that can be delivered from the Established Housing Land Supply
5. Allocate additional housing land to make up any shortfall between the Established Land Supply and the Housing Land Requirement.

Following this, we have undertaken a critique of Options 1, 2 & 3, and finally we propose an "Alternative Option 3"

HOUSING NEED AND DEMAND IN EDINBURGH

Scottish Planning Policy (para 113) requires plans to be informed by a robust housing need and demand assessment (HNDA). HNDA 2 is the most recent assessment of need and demand in Edinburgh which has been agreed as robust and credible, and we therefore support its use as the basis for establishing the Housing Supply Target for CityPlan 2030. Moreover, in the context of current circumstances, we support the use of the Wealth Distribution Scenario.

HNDA 2 identifies the following need and demand in Edinburgh from 2019 - 2032 (taking account of house completions up to 2019):

1. Wealth Distribution: Affordable Housing - 44,586 units
Private Housing - 22,588 units
Total - 67,174 units

Scottish Planning Policy (para 115) indicates that the Housing Supply Target should be reasonable, should "PROPERLY REFLECT" the estimate of housing demand, and should be supported by compelling evidence.

As explained below, none of the 3 options presented in the Choices document comes close to meeting the housing need and demand identified in the Wealth Distribution Scenario of HNDA 2. In our view, the approaches suggested are contrary to Scottish Planning Policy in that they do not "properly reflect" the HNDA estimate and are not supported by compelling evidence.

There is a reference in the Council's documentation to the other factors involved in setting the housing target, however, it is not explained in any detail why a downward adjustment from the HNDA output is justified having regard to the "wider economic, social and environmental factors, issues of capacity, resource and deliverability, and other important requirements such as the aims of National Parks" required by Scottish Planning Policy.

This is an important matter given the historic severe undersupply of housing and housing land in Edinburgh and requires further attention. It is not clear if the Council has considered in any detail how first housing need and demand could be met before deciding a reduced HST was necessary. In this regard the HSTs in Choices could be seen to have been set using a 'back to front' methodology. Recent LDP Examination decisions such as those at Falkirk and Stirling are instructive on this matter. The findings of the Falkirk Reporter are quoted below:

"I agree with representees that this is not an appropriate approach for the council to have adopted; diagram 1 on page 30 of SPP makes clear that the setting of the housing supply target comes before the identification of land, as does a fair reading of SPP paragraph 120." (Issue 2, para. 35)

"In my view it is illogical to take a supply-led approach to the setting of the housing land requirement. The housing land requirement is intended to be the driver for ensuring a sufficiently generous supply of land is available to meet the housing supply target. If the housing land requirement is derived from the identified supply, rather than the opposite way round, the housing land requirement cannot have directly informed decision-making over which sites ought to be allocated." (Issue, para. 71)

Edinburgh has not been in a position recently where it has even attempted to allocate sufficient land to meet its own housing need and demand in full. Instead, a significant proportion of its need and demand has been redistributed to other authorities. As we refer to below, there is no reference in Choices 2030 to meeting any of Edinburgh's housing need and demand elsewhere.

HOUSING SUPPLY TARGET

The Choices document states that Edinburgh's housing target 2019 to 2032 is:

- Market Housing - 22,600
- Affordable Housing - 20,800
- Total - 43,400

THIS COMPARES WITH THE HNDA 2 TOTAL NEED AND DEMAND OF 67,174 HOMES, WHICH IS A SHORTFALL OF 23,774 HOMES. IN OTHER WORDS, CHOICES 2030 IS PROPOSING TO MEET ONLY 65% OF THE NEED AND DEMAND.

THE MAIN REASON FOR THIS IS THAT COUNCIL CONSIDER THAT THE 23,786 AFFORDABLE HOMES CANNOT BE PROVIDED FOR. THE DECISION TO THEREFORE IGNORE THIS MASSIVE SHORTFALL IN MEETING THE NEED FOR AFFORDABLE HOUSING IS NOT PROPERLY JUSTIFIED, DOES NOT PROPERLY REFLECT THE HNDA AND, IN OUR VIEW, IS DEEPLY FLAWED.

To undersupply housing land in Edinburgh by nearly one third of requirements is likely to have a very significant impact on the housing market over the coming years. The Council acknowledges the current significant shortfall of affordable housing and the proposed strategy can only serve to massively exacerbate the problem. Given that Scottish Planning Policy for delivering more affordable housing hinges on a proportion of market sites being given over to affordable housing, an obvious alternative is to increase housing land release overall, which can accommodate market and affordable homes.

If the Council does not intend to distribute any of its housing need and demand to neighbouring Council areas, as has been traditionally the case, then it should aim to have a strategy which meets need and demand within its own boundaries, or at least adopt a strategy that "properly reflects" the HNDA as required by Scottish Planning Policy.

We understand the Council's case for not adopting such a strategy, which is that there is doubt, based on historic completions rates, that the amount of housing actually required can be delivered. This, in our view, is not a reason to suppress the HST. This is because if the HST is suppressed to reflect historic completion rates rather than actual demand, it will mean that there is insufficient land allocated for the market to respond to that demand. In other words, the suppressed

HST dictates and constrains delivery.

IN OUR VIEW, THEREFORE, CITYPLAN SHOULD SET AN ALL TENURE HOUSING SUPPLY TARGET IN LINE WITH THE HNDA 2 WEALTH DISTRIBUTION SCENARIO I.E. 67,174 HOMES.

Moreover, the precise splits between tenures are sensitive to minor changes in variables. The variables can change significantly over time. We therefore consider that the all tenure output of the HNDA should be the primary piece of information which informs the HST. This approach was endorsed by the Reporter at the recent Falkirk LDP Examination (DPEA ref. LDP-240-2), as follows:

"I do however acknowledge that needs and demands for different tenures are likely to vary over the course of the plan period. Therefore I reiterate that it is the overall, all tenure housing supply target against which the number of completions and availability of effective land should ultimately be tested, regardless of tenure." (Issue 2, para. 66)

EXISTING (ESTABLISHED) HOUSING SUPPLY

The existing housing supply is made up of two components – effective and constrained sites. Although we agree that sites which are identified as effective in the 2019 Housing Land Audit should be taken into account, we question the number of units which is assumed will be delivered by 2032. This is because the Council appears to have assumed that all effective sites will be developed in their entirety by 2032, when in reality the rate of delivery on some larger sites will mean that the development is unlikely to be completed by that date. Homes for Scotland have assessed this matter in detail in their submission to Choices 2030, and have calculated that 21,055 dwellings rather than the 22,696 identified in the Council's Housing Land Study are likely to come forward. The calculation that HfS have undertaken is robust, based on projecting forward the programming shown in the 2019 HLA for the first 7 years of development. This approach has recently been supported by the Report of Examination on the Aberdeen City & Shire Strategic Development Plan, as follows:

"The approach used by Homes for Scotland where the programming of sites is extrapolated beyond the period stated in the housing land audit is well-evidenced with tables showing each site in each authority and market housing area. There will be instances where sites perform better and some which deliver less than the extrapolated method shows but it reasonably carries forward the last known (and agreed) programme of delivery on each site into the future. Therefore, I consider that it can be effectively used to predict the amount of the established supply that is considered to become effective during the periods 2027 to 2032 and 2033 to 2040." (para. 26, p. 193, Issue 14)

The Housing Land Study identifies the future delivery of 7,468 houses on constrained sites. This is a highly optimistic assumption given that constrained sites by their nature have impediments to overcome and no identified solution. In some cases we accept that these constraints may be overcome. However, equally sites which are currently considered effective may become constrained over time. Therefore, in our view, only currently effective sites should be relied upon to contribute to the land supply and this approach was also endorsed in the Report of Examination for the Aberdeen City and Shire SDP.

THUS, AGAINST THE COUNCIL'S ASSUMPTION THAT THE EXISTING HOUSING LAND SUPPLY WILL DELIVER 30,164 UNITS, WE ARE OF THE VIEW THAT THIS SHOULD BE ASSUMED TO BE 21,055 UNITS.

ESTABLISHING THE HOUSING LAND REQUIREMENT

Scottish Planning Policy (para 115) requires plans to allocate 10 – 20% more homes than the Housing Supply Target figure to provide generosity and flexibility. The Choices document proposes the lowest level of generosity at 10%. We support this approach but only on the basis that no delivery is assumed from constrained sites as described above and also that a more realistic approach is taken to delivery assumptions from the 142 'new' brownfield sites described in the Housing Study (see below). The Council's delivery assumptions are highly speculative and optimistic in our view and even if generosity was pegged at 20% it would be too little to account for the risk of the supposed supply not delivering.

SO THERE IS A BALANCE TO BE STRUCK BETWEEN THE RELATIVE RISK OF THE ESTABLISHED HOUSING LAND SUPPLY NOT DELIVERING AS PREDICTED AND THE %AGE GENEROSITY. IN THE CONTEXT OF THE ASSUMPTIONS MADE IN CHOICES 2030, IT SHOULD BE SET AT 20% AT LEAST.

HOWEVER, IN THE FOLLOWING SECTION WE HAVE USED A FIGURE OF 10%, ON THE BASIS THAT MORE REALISTIC DELIVERY ASSUMPTIONS FOR CONSTRAINED AND NEW BROWNFIELD SITES WILL BE USED.

NEW LAND REQUIREMENT

Following on from the above considerations, it is reasonably straight forward to calculate the number of new homes for which new land needs to be allocated in CityPlan.

Housing Need & Demand 2019 – 2032: 67,174 units
Housing Supply Target: 67,174 units
Housing Land Requirement (HST + 10%) 73,892 units
Effective Housing Supply: 21,055 units
New Land Requirement: 52,837 units

CRITIQUE OF OPTIONS 1, 2 AND 3 IN CHOICES 2030

OPTION 1

Option 1 proposes to deliver 17,600 houses in the plan period on land within the urban area through rapid intervention by the Council and its public sector partners. If landowners do not bring forward the identified sites for development the Council proposes compulsory purchase.

As explained in the Housing Land Study, 142 brownfield sites have been identified which are stated to have medium to high potential for housing. As we explain below there is not any evidence presented to indicate that this is in fact the case. Some of the sites may meet planning objectives e.g. proximity to public transport, but there is significant doubt regarding delivery.

Although we fully recognise and support the priority to bring forward brownfield land for development, unfortunately Option 1 has a number of fundamental problems which should rule it completely out of contention.

Firstly, the identified capacity of 17,600 is only about 33% of the number of additional new houses required to meet Edinburgh's need and demand.

Secondly, it is highly unlikely that the 142 identified sites will be developed in their entirety by 2032.

The deliverability of these sites has not been considered in the Housing Study. Important basic information about the sites is apparently unknown including whether the owner is interested in selling / developing the site and who owns them.

Just 6ha of land (capacity for 428 dwellings) is identified as suitable. A further 140ha is identified as being partially suitable for development (7,767 dwellings) and 127ha (8,406 dwellings) as unsuitable. Nevertheless, it has been assumed that all of these sites, whatever their classification will be delivered in full during the plan period, apparently disregarding the suitability review.

Of the 275ha of land just 11ha is vacant. The delivery of the land therefore assumes that the operation of existing businesses or public sector organisations will cease. For this to be the case residential development would need to create a land value in excess of the value of the premises in its current use and provide sufficient incentive for the landowner to sell. This has not been considered in the Housing Study and should not necessarily be assumed for the following reasons:

1. The change of use of industrial to residential will have a heavy cost burden, including significant developer contributions and often high abnormal land remediation costs. In many cases this may make residential development economically unviable.
2. The City Plan Industrial Property Market finds that industrial site vacancy rates are low in Edinburgh and rents are growing. This picture is similar in South East Scotland with Ryden's 85th Scottish Property Review noting that vacancies are at record low levels (p. 20). Moving location will be difficult for many operators and so they may well place a particularly high value on sites for owner-occupiers or outstanding lease periods for tenants. This will mean that asking prices for those that may be willing to sell could also reflect valuations of the operating companies as going concerns.

Many of these sites will have already been considered by private developers with the landowners approached. It is for the Council to explain how, despite having not come forward to date, they will be delivered for housing, despite the financial burdens of planning policy being increased, reducing the land value which could be offered by a prospective developer.

The lead in times for many of the sites, even if they are in single ownership and can be viably developed, will be lengthy. Existing leases would need to expire or be bought out, which would add to viability challenges. However, for many sites, there will be multiple ownerships, where conflicting interests will add to the difficulties.

Compulsory purchase is unlikely to be solution due the complexity, length, cost and uncertainty of the procedure. It is questionable whether CPO would be successful if seeking to acquire land occupied by active businesses with employees unless there were already other suitable premises in suitable locations available. One would also question the desire of the Council to even want to proceed in individual cases that involved forcing the closure of businesses and related loss of employment.

The time taken to go through the process should also not be underestimated. It will presumably be necessary to give the owners a chance to bring the site forward for development themselves. This could be a period of five years, but many sites may well have current leases lasting longer than this. It would then be necessary to make efforts to obtain the sites on the open market. A CPO may be able to be ran alongside this but the process would still take many years. For instance for the St James Centre, approaches were first made to owners in 2008 and has only been completed 12 years later.

The costs and logistics of running multiple contentious CPOs simultaneously will also likely be prohibitive.

Moreover, much of this land is currently in employment use, and the Choices document says intervention will be required to deliver 275 hectares of employment land. There is virtually nothing in the Choices document to explain how this provision of employment land will transition without resulting in significant economic upheaval and related negative impacts for employment and service delivery.

OPTION 2

Option 2 proposes 27,900 homes on a number of large-scale greenfield sites around the City. Although we support the release of these sites, there are a number of flaws in this strategy.

Firstly, the number of homes proposed is only just over half of the additional new homes required to meet housing need and demand in full.

Secondly, it is unlikely that the number of houses proposed can be delivered on these sites by 2032. There are about 10 ownership interests involved and a rough calculation would suggest that each of these might deliver in the region of 200 homes per year once started. Given the strategic nature of these sites and the lengthy planning and related consenting process it is realistic to assume that development is unlikely to begin until 2025 at the earliest. An realistic assumption might be that each site will therefore deliver 200 houses/year for a 7-year period up to 2032, producing a total of approximately 14,000 houses, which is significantly below the ambition of 27,900.

It is therefore clear that significant additional new sites are be required, simply to get closer to meeting full housing need and demand.

OPTION 3

Option 3 is described as the blended approach, focussing on greenfield and brownfield land. However, it too has fundamental shortcomings.

Firstly, it only proposes 17,600 houses in total, the same as Option 1, which as explained above is only a fraction of what is required to meet Edinburgh's housing need and demand.

Secondly, although it assumes 11,000 houses are built on the 142 urban brownfield sites identified rather than 17,600 in Option 1, in our view this continues to be a very significant over-estimate of what can be achieved for the reasons we have explained under Option 1.

Also, the proposal for 6,600 houses on greenfield sites significantly under-utilises the delivery potential on sustainable sites around Edinburgh.

ALTERNATIVE OPTION 3

We agree that a 'blended approach' of greenfield and brownfield land release for housing is appropriate but it should seek to deliver significantly more homes than is likely to arise from Option 3.

If Edinburgh's housing need and demand is to be met in full then that would mean that new land for 52,837 homes would need to be identified. However, we accept that it is not a realistic proposition that this number of houses (minus 10% generosity) could be delivered in the plan period in addition to the effective housing land supply.

It is notable that the Choices document does not envisage that at least some of the very large proposed shortfalls in meeting Edinburgh's housing need and demand in full should be accommodated elsewhere in the City Region. This is the approach that has been the cornerstone of strategic planning for housing in the Region for many decades, and its abandonment now has significant consequences for the City. To simply ignore the unmet housing need and demand that would inevitably arise from any of the 3 Options proposed in the Choices document is not, in our view, a reasonable or acceptable approach. Nor does it comply with Scottish Planning Policy or Government aspirations for the delivery of housing to reflect need and demand.

We therefore propose an Alternative Option 3. As described below, this is more realistic in regard to the delivery of housing on brownfield land, but continues to be aspirational to ensure that its potential is maximised. Greenfield land has much greater potential than identified in Option 3.

In our view, a more reasonable and realistic assumption for delivery from new brownfield sites within the plan period is 6,000 homes. Even that will be a significant challenge given the issues we have noted above in respect to viability, lead-in times, CPO etc.

Option 2 of the Choices document indicates that 27,900 units can be delivered on the greenfield sites identified. However, because of lead-in times for development and the limit to the rate of development on individual sites, it is inevitable that additional greenfield sites will need to be identified to achieve this total within the plan period.

12B Do you support or object to any of the proposed greenfield areas? (Please tick all that apply)

Support Greenfield - Support:

Support Greenfield - Object:

Explain why:

Barratt Homes do not object to any of the housing allocations proposed in Choices 2030. However, as explained in answer to Q12A, the number of greenfield allocations proposed by all three strategy options is significantly less than needed to approach meeting Edinburgh's housing need and demand. In particular there is almost a complete absence of smaller housing sites proposed, which could make a significant contribution to the significant shortfall in housing provision in the short to medium term. Although the allocation of large strategic sites is to be welcomed, past experience is that such sites will have long lead-in times and will be dependent on significant infrastructure provision, which in many cases is not yet in place.

With that in mind, Barratt Homes are therefore seeking the allocation of a site for housing at Frogston Road East, within the South of Frogston Road East Assessment Area in the Housing Study. A brief document which identifies the boundaries of the Frogston Road East site, its context and Barratt's proposals is submitted in response to Q12C. The land at Frogston Road East comprises approximately 17 hectares proposed for residential development. The site has capacity for up to 500 homes including affordable homes on site along with shops, business space, open space, landscaping and SUDs.

Respectfully, it appears to us that the non-identification of the site for potential housing development in Choices 2030 may be partly due to a number of incorrect assumptions and conclusions in the Area Assessment contained in the Choices 2030 Housing Study. We appreciate that the preparation of such assessments for so many sites is challenging, and can lead to broad brush conclusions which do not necessarily reflect the actual circumstances for a particular site. A particular constraint of the assessments undertaken by the Council is that the areas assessed are often larger or have different boundaries to the site being promoted for development. That is not a criticism of the assessment process, but it does mean that the assessment conclusions are not necessarily applicable to the site in question. Indeed, this is the case for Frogston Road East, It is obviously crucial that the site being promoted is considered on the correct basis, and to assist in this process Barratt has enlisted a number of experts to review the Frogston Road East site against the various criteria in the Assessment.

We have therefore listed below each of the Assessment criteria for the South of East Frogston Road area and provide comments in capital letters on where we agree and disagree with the conclusions.

Does the site fit within an area identified as a strategic development area?

Partially – The eastern part of the site is within the South East Edinburgh SDA

COMMENT: ALL OF THE FROGSTON ROAD EAST SITE IS WITHIN THE SDA. THIS STATUS SHOULD BE A SIGNIFICANT FACTOR IN DECIDING TO ALLOCATE OR GRANT PERMISSION FOR A SITE FOR HOUSING, ALBEIT SUBJECT TO SITE SPECIFIC MATTERS.

Does the site support travel by foot to identified convenience services?

No – The site is not within walking distance to local convenience services. It is unlikely that access can be improved and convenience services are unlikely to be provided on the site due to lack of scope for development nearby.

COMMENT: THIS COMMENT IS OUT-OF-DATE AS THERE IS A FARM SHOP AT MORTONHALL GARDEN CENTRE ACROSS THE ROAD FROM THE SITE WHICH SELLS A RANGE OF CONVENIENCE ITEMS, SEVEN DAYS A WEEK. THERE ARE ALSO A NUMBER OF SHOPS IN NEARBY GRACEMOUNT. ALSO, AS SHOWN ON THE MASTERPLAN SUBMITTED IN RESPONSE TO Q12C, WE ARE PROPOSING TO ACCOMMODATE SHOPS AND BUSINESS FLOORSPACE WITHIN THE DEVELOPMENT.

Does the site support travel by foot to identified employment clusters?

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.

COMMENT: THIS IS INCORRECT. BROOMHILLS BUSINESS CENTRE PROVIDES OFFICE ACCOMMODATION. THE NEARBY GARDEN CENTRE AND CAMPSITE ARE THRIVING BUSINESSES. ALSO, AND PERHAPS MOST IMPORTANTLY, STRAITON RETAIL PARK IS WELL WITHIN THE WALKING DISTANCE OF 2,400 METRES. STRAITON RETAIL PARK SUPPORTS HUNDREDS OF JOBS. THE DEVELOPMENT OF THE ADJACENT BROOMHILLS SITE WILL PERMIT PASSAGE SOUTH-EASTWARDS THAT DOES NOT CURRENTLY EXIST. A SIGNAL CONTROLLED CROSSING OF BURDIEHOUSE ROAD DOES CURRENTLY EXIST AND THIS ENABLES ACCESS TO THE EAST SIDE OF THE ROAD, WHICH MAKES THE CROSSING OF THE STRAITON JUNCTION MORE COMFORTABLE.

Does the site have access to the wider cycle network?

No – The site does not have access to the wider cycle network and access is unlikely to be improved as no suitable potential cycle route interventions have been identified which could serve the site.

COMMENT: PAGE 21 OF THE ACTIVE TRAVEL ACTION PLAN (ATAP) SHOWS A ROUTE DIRECTLY OPPOSITE THE SITE. THIS HAS NOT YET BEEN TAKEN FORWARDS INTO QUIET ROUTES MAPPING, BUT DEVELOPMENT OF THE SITE COULD HELP DELIVER THIS LINK. THE ATAP MAPPING SHOWS THAT CECS COMMENT ON THIS IS INCORRECT. NB THE CRITERON STATES "ASSESSMENT SHOULD ALSO TAKE INTO ACCOUNT IDENTIFIED ACTIVE TRAVEL INTERVENTIONS WHICH MAY IMPROVE AND EXPAND THE NETWORK, INFORMED BY THE ACTIVE TRAVEL ACTION PLAN AND THE ONGOING EDINBURGH STRATEGIC SUSTAINABLE TRANSPORT STUDY." WE ALSO NOTE THAT WITHIN Q8B THERE IS REFERENCE TO THE PENTLANDS TO PORTOBELLO CYCLE LINK WHICH CAN LINK THROUGH THE SITE.

Can the site support active travel overall through appropriate intervention?

No – The site would not support active travel overall, as the site is not within walking distance of local convenience services and employment clusters. Access to the wider cycle network is poor and it is unlikely to be improved through an identified intervention.

COMMENT: FOR THE REASONS GIVEN ABOVE, THIS CONCLUSION IS WRONG. CYCLE AND FOOTPATH CONNECTIONS WOULD BE PROVIDED ON SITE AND WOULD CONNECT INTO EXISTING PATHS, INCLUDING THE CURRENT LOCAL PATH ALONG BROOMHILLS ROAD ALONG THE EASTERN BOUNDARY OF THE SITE. THERE IS ALSO THE OPPORTUNITY TO LINK UP GAPS BETWEEN EXISTING CORE PATHS IN THE AREA, LINKING THROUGH THE SITE.

Does the site support travel by public transport through existing public transport network accessibility and capacity?

Partially – The site has limited support for travel by public transport based on existing or incrementally improved provision.

COMMENT: PUBLIC TRANSPORT PROVISION IS GOOD, INCLUDING THE FREQUENT NO. 11 BUS WHICH LINKS TO THE CITY CENTRE AND SERVICE 400 WHICH DIRECTLY LINKS THE SITE WITH EDINBURGH PARK AND THE AIRPORT WITHOUT THE NEED TO CHANGE BUSES. MOREOVER, IT IS THE SAME BUS SERVICE THAT SERVED THE BROOMHILLS SITE WHEN IT WAS ALLOCATED, WHICH WAS DEEMED TO BE EXCELLENT AND SUSTAINABLE.

THE BURDIEHOUSE AREA IS IDENTIFIED IN THE DRAFT CITY MOBILITY PLAN AS BEING AN AREA WITH GOOD PUBLIC TRANSPORT ACCESSIBILITY AND THE SITE IS LOCATED ON A ROUTE IDENTIFIED FOR IMPROVED PUBLIC TRANSPORT WALKING AND CYCLING ROUTE CONNECTING STRATEGIC DEVELOPMENT AREAS IN THE DRAFT CITY MOBILITY PLAN SPATIAL VISION. THE STRATEGIC SUSTAINABLE TRANSPORT STUDY IDENTIFIED 'CORRIDOR 4- CITY CENTRE TO EASTER BUSH/STRAITON', WHICH PASSES THROUGH BURDIEHOUSE, AS ONE OF THE OPTIONS FORMING A BASIS FOR CONSIDERATION OF TRANSIT OPTIONS. THIS ROUTE HAS POTENTIAL TO LINK INTO THE SAFEGUARDED TRAM ROUTE ALONG CORRIDOR 3, WITH STRAITON PARK & RIDE AS A POTENTIAL ANCHOR TO THE SOUTH. ANALYSIS OF CORRIDOR 4 NOTES IN APPENDIX A OF THE STUDY NOTES, IN RELATION TO DEVELOPMENT IMPLICATIONS THAT 'SITES TO THE IMMEDIATE WEST AS OF THE CORRIDOR (I.E. BUILD-OUT FROM THE EXISTING URBAN DEVELOPMENT), COULD READILY BE SERVED BY THE EXISTING ROUTE'. THE LAND AT FROGSTON ROAD IS LOCATED TO THE IMMEDIATE WEST OF EXISTING DEVELOPMENT WITHIN CORRIDOR 4.

THIS SITE THEREFORE PROVIDES THE OPPORTUNITY FOR PLAYING A KEY PART IN REALISING BOTH THE HOUSING AND TRANSPORT ASPIRATIONS OF CITY PLAN 2030 AND CITY MOBILITY PLAN.

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 site has limited support for travel by public transport without major intervention deliverable within the plan period.

Comment – The site has good public transport as things stand. GOOD POTENTIAL FOR IMPROVEMENTS TO EXISTING SERVICES AND ROUTES AND FOR TRANSIT LED DEVELOPMENT IN THE AREA AS NOTED IN THE TRANSPORT STUDY AND AS NOTED ABOVE.

Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?

No – The site does not have sufficient primary school infrastructure capacity.

COMMENT: SEE COMMENT BELOW

Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?

No – The site does not have sufficient secondary school infrastructure capacity.

COMMENT: SEE COMMENT BELOW

If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?

Partially – The site does not have sufficient community infrastructure capacity to support development but this can be addressed through extension of the new primary school at Broomhills, depending on the scale of development, and provision of additional capacity at Gracemount High School.

COMMENT: AGREED. THE SITE IS ALREADY IDENTIFIED AS BEING WITHIN THE CATCHMENT OF THE NEW BROOMHILLS PRIMARY SCHOOL AND WILL BE JUST 200M TO THE EAST OF THE SITE WHICH IS DUE TO OPEN IN AUGUST 2020.

Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?

No – No scope for development has been identified on this site due to its strong contribution to the setting of the city, visually prominent location, and being beyond the firm settlement boundary formed by Frogston Road East, estate walls and woodland with little opportunity to form a new boundary.

COMMENT: WE DISAGREE. BARRATT'S LANDSCAPE AND VISUAL ASSESSMENT SUBMITTED IN RESPONSE TO Q12C CONCLUDES THAT THE PROPOSED DEVELOPMENT IS BROADLY ACCEPTABLE IN LANDSCAPE AND VISUAL TERMS. PROPOSALS FOR ROBUST LANDSCAPE PLANTING AND OPEN SPACE WILL ENSURE ACCORDANCE WITH THE DESIGN AIMS TO ENHANCE THE COUNTRYSIDE AND RURAL ENVIRONMENT, THE

LANDSCAPE SETTING OF THE CITY, AND THE OPEN SPACE GENERALLY, AS WELL AS TO ENSURE CAREFUL INTEGRATION OF NEW BUILDING INTO THE LANDSCAPE.

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?
Partially – The site may be considered of value for the strategic green network, due to lying within an area identified as a green network opportunity in Edinburgh itself.

COMMENT: DEVELOPMENT OF THE SITE WILL CREATE OPPORTUNITIES TO CONNECT TO THE STRATEGIC GREEN NETWORK.

Would development of the site avoid identified areas of 'medium high flood risk' (fluvial) or areas of importance for flood management?

Partially – Part of the site is covered by identified areas of medium high flood risk and an area of importance for flood management. This does not cover the majority of the site however.

COMMENT: THE SITE PROPOSED FOR DEVELOPMENT IS NOT WITHIN AN AREA OF FLOOD RISK.

THE BURDIEHOUSE BURN LIES TO THE SOUTH WEST OF THE SITE AND IS APPROXIMATELY 90M TO THE SOUTH OF THE SITE AT ITS CLOSEST. THE EXTENT OF THE 1 IN 200-YEAR PLUS 40% CLIMATE CHANGE FLOOD RISK AREA ASSOCIATED WITH THE BURDIEHOUSE BURN HAS BEEN IDENTIFIED THROUGH A STAGE 1 FLOOD RISK ASSESSMENT OF THE SITE. THIS AREA APPROXIMATELY CORRELATES WITH THE AREA IDENTIFIED IN THE SEPA FLOOD MAPS AND ALSO THE AREA IDENTIFIED AS A FLOOD MITIGATION AREA IN THE CURRENT LDP. IT RUNS ALONG THE SOUTH WESTERN BOUNDARY OF THE SITE.

NO DEVELOPMENT IS PROPOSED WITHIN FLOOD RISK AREA. ALL DEVELOPMENT WILL BE SET BACK FROM THE EDGE OF THE FLOOD RISK AND THE AREA WILL FORM PART OF THE LANDSCAPE STRATEGY. SURFACE WATER MANAGEMENT WILL ALSO BE INCORPORATED INTO THE OPEN SPACE AND LANDSCAPING DESIGNS.

Is the site suitable for development?

No. The site is not suitable for development due to its present use, landscape character and contribution to the strategic green network

COMMENT: THE SITE'S PRESENT USE IS AGRICULTURAL WHICH IS NO DIFFERENT TO OTHER GREENFIELD SITES WHICH HAVE BEEN ALLOCATED. THE AGRICULTURAL FIELDS THEMSELVES MAKE LITTLE CONTRIBUTION TO THE STRATEGIC GREEN NETWORK. THE TREES AND VEGETATION SURROUNDING THE SITE DO MAKE A CONTRIBUTION AND THESE SHALL BE RETAINED. WE DISAGREE THAT THE LANDSCAPE CHARACTER IS SUCH THAT DEVELOPMENT CANNOT BE WELL CONTAINED AND APPROPRIATE IN OTHER RESPECTS.

THIS SITE PRESENTS AS MUCH OPPORTUNITY TO CONTRIBUTE TOWARDS SUSTAINABLE DEVELOPMENT AS ANY OF THE OTHER SITES IDENTIFIED AS POTENTIAL GREENFIELD ALLOCATIONS.

12C Do you have a greenfield site you wish us to consider in the proposed Plan?

Greenfield file upload:

Frogston Road Masterplan.pdf was uploaded

Greenfield file upload:

No file was uploaded

Greenfield file upload:

No file was uploaded

12D Do you have a brownfield site you wish us to consider in the proposed Plan?

Brownfield sites upload:

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