

**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**

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

Supporting Info   
Email

Choice **1 C**

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

Short Response

Explanation

Choice **1 D**

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

Short Response

Explanation

Choice **1 E**

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

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 1 F

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

Short Response

Explanation

Choice 1 F

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

Short Response

Explanation

Choice 1 G

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

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **1 H**

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

Short Response

Explanation

Choice **2 A**

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

Short Response

Explanation

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

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

Supporting Info   
Email

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

Choice **2 D**

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

Short Response

Explanation

Choice **3 A**

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

Short Response

Explanation

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

Supporting Info   
Email

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

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

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

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 5 B

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

Short Response

Explanation

Choice 5 C

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

Short Response

Explanation

Choice 5 D1

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

Short Response

Explanation

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

Supporting Info   
Email

Choice 5 D2

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

Short Response

Explanation

Choice 5 E

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

Short Response

Explanation

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



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

Supporting Info   
Email

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

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

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

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **7 C**

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

Short Response

Explanation

Choice **7 D**

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

Short Response

Explanation

Choice **8 A**

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

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

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

Supporting Info   
Email

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

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

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **10 B**

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

Short Response

Explanation

Choice **10 C**

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

Short Response

Explanation

Choice **11 A**

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

Short Response

Explanation

Customer Ref: 01699 Response Ref: ANON-KU2U-GPUR-5

Supporting Info

Name Callum Fraser (Iceni Projects)

Email Cfraser@iceniprojects.com

Response Type Agent / Consultant

On behalf of: H&H Group Plc

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 Not Answered

Explanation Not Answered

Customer Ref: 01699      Response Ref: ANON-KU2U-GPUR-5

Name: Callum Fraser (Iceni Projects)

Response Type: Agent / Consultant

On behalf of: H&H Group Plc

Supporting Info:

Email: Cfraser@iceniprojects.com

Choice 12 A

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

Short Response:

**Explanation**

H&H Group Plc do not support any of the options because none are likely to provide the context to deliver sufficient housing to meet Edinburgh's housing need and demand until 2032. H&H Group Plc proposes an alternative to Option 3 (Blended Approach), which allocates much more land for housing than currently proposed. The justification for this revised approach is outlined below: We have critiqued the approach presented by CEC under Choice 12 before reaching our own conclusion as to how many homes are required during the plan period and the most appropriate strategy for their delivery. To determine how many homes to provide during the plan period (to 2032) CEC use the supply targets set by Strategic Development Plan 1, along with the updated Housing Need and Demand Assessment (HNDA2) prepared for Strategic Development Plan 2. SDP1's 'all tenure' target sets out housing demand across South East Scotland to 2032 but does not provide a breakdown by local authority beyond 2024. CEC use HNDA2 to determine how much of the remaining regional housing target should be met within Edinburgh. Within the City Plan 2030 Housing Study (Jan 2020) Table 1 - Scenarios of Need and Demand 2019-2032 (HNDA2) confirms that, under the adopted Wealth Distribution Scenario, housing need and demand for the City of Edinburgh for the period 2012-2032 is 81,685 homes. Accounting for the 14,511 housing completions in the period 2012 - 2019, Edinburgh's remaining housing need and demand for the period 2019 to 2032 is 67,174. Within this context Choices for City Plan 2030 presents two housing supply target options: Preferred Option: 43,400 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HNDA 2 Wealth Distribution Scenario (31,772) less completions between 2012 and 2019 (9,184). Alternative Option: 52,800 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HNDA 2 Strong Economic Growth Scenario (41,116) less completions between 2012 and 2019 (9,184). Either option would fall some way short of meeting housing need and demand in full. Despite the Housing Study identifying Edinburgh's housing need and demand for the plan period as 67,174 the Choices 2030 document provides no justification as to why this target cannot be met. It is understood this is a result of the Council's commitment to deliver 20,800 affordable homes in the period 2019-2032, a figure significantly below the need for 44,586 affordable homes within the same period, as identified by HNDA2 (and specifically referenced within the Housing Study). Having identified a preferred housing supply target, the Choices 2030 document then calculates how much land the emerging plan must provide. It calculates the total land available for housing as follows: Edinburgh's Potential Housing Land (2019) Land identified in housing land audit for affordable housing 6,100 Land identified in housing land audit for market housing 14,800 Other land in housing land audit (without consent) 9,200 Potential urban area land identified through Housing Study 16,900 Total potential land available for housing 47,000 In short, CEC consider there to be sufficient land for c 30,100 homes (based upon the 2019 Housing Land Audit). However we note that around 25% of this land (c 7,468 homes) is recognised by CEC as being constrained. This calculation also includes potential for an additional 16,900 homes on land within the urban area as identified by the Housing Study, which we consider below.

In support of CEC's preferred housing supply target, Table 1 of the Choices document calculates the additional land that must be identified by the City Plan. Its findings are reproduced below:

	Market	Affordable	Total
Housing Supply Target	22,600	20,800	43,400
Current Land			

Customer Ref: 01699 Response Ref: ANON-KU2U-GPUR-5  
 Name: Callum Fraser (Iceni Projects)  
 Response Type: Agent / Consultant  
 On behalf of: H&H Group Plc

Supporting Info:   
 Email: Cfraser@iceniprojects.com

Supply 30,164 Effective 22,696 Constrained 7,468 Additional land to find (+10% flexibility) 17,600 To deliver these additional 17,600 homes, three potential spatial strategies are proposed:

- Option 1: Delivery by the Council and its partners within the urban area
- Option 2: Delivery through market housing by releasing greenfield land
- Option 3: A blended approach

CEC advocates Option 1 – Delivery by the Council and its partners within the urban area. In support of this the Choices document identifies 275 hectares of current employment land as the only locations for future housing development. The success of this approach depends upon a range of commercial factors largely out with the Council’s control, indeed the Choices document specifically recognises that “this approach may not be financially viable” and will “require a significant CPO programme to ensure land comes forward”. It is notable that of the 275 hectares of urban land identified as potentially suitable for housing-led development, only 11 hectares is vacant and ready for development whilst only 30 hectares benefit from planning permission. The remainder of the land is currently in active alternative use – predominantly business/employment related. The deliverability of these sites does not appear to have been considered in any detail by the Housing Study and remains highly speculative. Important basic information about the sites appears to be unknown - including their ownership and whether the owner is interested in selling / developing the site. Many of the areas and sites identified will be multi-owned and multi-let industrial estates, further complicating issues relating to land assembly. Despite this lack of information, the preferred option envisages these sites delivering 16,900 new homes between 2019 and 2032. The priority given to urban as opposed to greenfield land is recognised as a means of making efficient use of existing infrastructure and services. However, if City Plan 2030 wishes to deliver the 67,174 homes required to meet Edinburgh’s remaining housing need and demand then Option 1 - Delivery by the Council and its partners within the Urban Area will not realistically achieve this. H&H Group Plc believe that an alternative approach must be pursued if Edinburgh’s housing need and demand is to be met. In response to Question 12A, H&H Group Plc has expressed support for an amended Option 3 – A Blended Approach which proposes a mix of urban area and greenfield land to deliver new homes. The Choices document proposes “a mix of the urban area land (approx. 11,000 units) and greenfield land (approx. 6,600 units)”. Five potential greenfield sites are identified for housing allocation, most notably in the context of this submission Area 4 – East of Riccarton is envisaged as creating a new urban extension to Edinburgh. It is clear that significantly more greenfield land will need to be allocated than is currently proposed. H&H Group Plc considers that the alternative housing supply target option of 52,800 homes for the period 2019-32 must be adopted, albeit recognising that this option remains below the unmet housing need and demand from 2019 to 2032 identified by HNDA2. By adopting the alternative housing supply target the land to be allocated by the emerging City Plan can be calculated as follows:

Housing Supply Target Requirement	52,800	10% flexibility	5,280
Effective Supply	22,696	Land to be allocated in City Plan 2030	35,384

On this basis, City Plan 2030 will be required to allocate new housing land with an indicative capacity of 35,000 homes. Even if the delivery of 11,000 homes on urban area land is achievable, which is highly speculative, additional greenfield land with development capacity for approximately 24,000 homes would still be required. Assuming that the five potential greenfield sites identified by the Choices document are released – providing indicative development capacity of 6,600 – greenfield land with capacity for a further 18,000 homes must be identified in order to meet housing need and demand during the plan period. For the reasons presented, H&H Group Plc supports an alternative Option 3 - A Blended Approach, amended in order to allocate around 35,000 homes on both Brownfield and Greenfield sites.



Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **12 B1**

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

Short Response

Explanation

Choice **12 B2**

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

Short Response

Explanation

Choice **12 B3**

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

Short Response

Explanation

Customer Ref:

01699

Response Ref:

ANON-KU2U-GPUR-5

Supporting Info

Name

Callum Fraser (Iceni Projects)

Email

Cfraser@iceniprojects.com

Response Type

Agent / Consultant

On behalf of:

H&H Group Plc

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 Yes

Explanation

Choice 12 B5

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

Short Response Not Answered

Explanation

Choice 12 B6

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

Short Response Not Answered

Explanation

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

Supporting Info   
Email

Choice **12 B7**

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

Short Response

Explanation

Choice **12 B8**

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

Short Response

Explanation

Choice **12 B9**

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

Short Response

Explanation

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

Supporting Info   
Email

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

Choice **12 BX**

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

Short Response

**Explanation** H&H Group Plc's landholdings – whilst not specifically identified as forming part of East of Riccarton proposed greenfield area by Map 17 within the Choices document – were included and assessed by the Housing Study as part of the 'East of Riccarton' area. The Council's Greenfield Site Assessment concluded that the East of Riccarton area – in its entirety – was suitable for development. Whilst H&H Group Plc consider their land to offer significant development potential in its own right, they would also note their willingness to work collaboratively with other landowners within the East of Riccarton area (notably Murray Estates and Stoddart) in support of a comprehensive and masterplanned urban extension. Given the very clear and definitive conclusions of the Site Assessment with regards the suitability of their land for development, H&H Group Plc queries why Map 17 within the Choices document, which defines Area 4 – East of Riccarton, does not include their landholding as part of the potential greenfield release. It is requested that this error be rectified, and the East of Riccarton boundary amended to include H&H Group Plc's land at Riccarton. Further details are provided in response to Question 12C.

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 12 C

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

Short Response

Explanation

Choice 12 C

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

Short Response

Explanation

Choice 12 C

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

Short Response

Explanation

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

Supporting Info   
Email

Choice 12 D

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

Short Response

Explanation

Choice 13 A

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

Short Response

Explanation

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

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

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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

Customer Ref:  Response Ref:

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On behalf of:

Supporting Info

Email

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



Customer Ref:  Response Ref:   
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On behalf of:

Supporting Info   
Email

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

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

Supporting Info   
Email

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

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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:

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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:

Supporting Info

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Email

Response Type

On behalf of:

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: 01699 Response Ref: ANON-KU2U-GPUR-5

Name Callum Fraser (Iceni Projects)

Response Type Agent / Consultant

On behalf of: H&H Group Plc

Supporting Info

Email Cfraser@iceniprojects.com

Choice 16 H

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

Short Response Not Answered

Explanation Not Answered





# Land at Riccarton, Edinburgh

## Response to Choices for City Plan 2030

Iceni Projects Limited on behalf of  
H&H Group Plc

April 2020

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ICENI PROJECTS LIMITED  
ON BEHALF OF H&H GROUP  
PLC

Land at Riccarton, Edinburgh

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# 1. INTRODUCTION

- 1.1 This statement has been prepared by Icen Projects on behalf of H&H Group Plc. It should be read in association with H&H Group Plc's representations to the Choices for City Plan 2030 consultation which have been submitted via the online survey.
- 1.2 For the reasons presented in the following sections H&H Group Plc requests that the land at Riccarton ("the site") be removed from the green belt and allocated for housing-led development within City Plan 2030.
- 1.3 In support of this, the statement provides details of the site, the development opportunity it presents and justification for its proposed allocation within City Plan 2030. This includes specific analysis of the housing land supply targets and strategy for delivery put forward by the Choices document alongside commentary on the 'Greenfield Site Assessment' presented by the City Plan 2030 Housing Study (Part 2b, p 160-162).
- 1.4 H&H would also refer to the associated representation made by Primus Riccarton Limited which promotes the development of purpose built student accommodation on a section of the site. H&H has endorsed and supports the submission by Primus.

## 2. CONTEXT FOR ADDITIONAL GREENFIELD RELEASE

- 2.1 At the outset, it is important to establish the context for additional greenfield release.
- 2.2 Choice 12 within the consultation document relates to '*Building our new homes and infrastructure*'. It presents the Council's preferred options in terms of how many new homes Edinburgh needs, who delivers the land required for these homes, and how they will be delivered in the most sustainable way.
- 2.3 This section of the report critiques the approach presented by CEC under Choice 12 before reaching its own conclusion as to how many homes are required during the plan period and the most appropriate strategy for their delivery.
- 2.4 To determine how many homes to provide during the plan period (to 2032) CEC use the supply targets set by Strategic Development Plan 1, along with the updated Housing Need and Demand Assessment (HNDA2) prepared for Strategic Development Plan 2. SDP1's 'all tenure' target sets out housing demand across South East Scotland to 2032 but does not provide a breakdown by local authority beyond 2024. CEC use HNDA2 to determine how much of the remaining regional housing target should be met within Edinburgh.
- 2.5 Within the City Plan 2030 Housing Study (Jan 2020) *Table 1 - Scenarios of Need and Demand 2019-2032 (HNDA2)* confirms that, under the adopted Wealth Distribution Scenario, housing need and demand for the City of Edinburgh for the period 2012-2032 is 81,685 homes. Accounting for the 14,511 housing completions in the period 2012 - 2019, Edinburgh's remaining housing need and demand for the period 2019 to 2032 is **67,174**.
- 2.6 Within this context Choices for City Plan 2030 presents two housing supply target options:
- Preferred Option:** 43,400 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HNDA 2 Wealth Distribution Scenario (31,772) less completions between 2012 and 2019 (9,184).
- Alternative Option:** 52,800 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HNDA 2 Strong Economic Growth Scenario (41,116) less completions between 2012 and 2019 (9,184).
- 2.7 Either option would fall some way short of meeting housing need and demand in full. Despite the Housing Study identifying Edinburgh's housing need and demand for the plan period as 67,174 the Choices 2030 document provides no justification as to why this target cannot be met. It is understood this is a result of the Council's commitment to deliver 20,800 affordable homes in the period 2019-

2032, a figure significantly below the need for 44,586 affordable homes within the same period, as identified by HNDA2 (and specifically referenced within the Housing Study).

2.8 Having identified a preferred housing supply target, the Choices 2030 document then calculates how much land the emerging plan must provide. It calculates the total land available for housing as follows:

<b>Edinburgh's Potential Housing Land (2019)</b>	
Land identified in housing land audit for affordable housing	6,100
Land identified in housing land audit for market housing	14,800
Other land in housing land audit (without consent)	9,200
Potential urban area land identified through Housing Study	16,900
<b>Total potential land available for housing</b>	<b>47,000</b>

2.9 In short, CEC consider there to be sufficient land for c 30,100 homes (based upon the 2019 Housing Land Audit). However we note that around 25% of this land (c 7,468 homes) is recognised by CEC as being constrained. This calculation also includes potential for an additional 16,900 homes on land within the urban area as identified by the Housing Study, which we consider below.

2.10 In support of CEC's preferred housing supply target, Table 1 of the Choices document calculates the additional land that must be identified by the City Plan. Its findings are reproduced below:

	<b>Market</b>	<b>Affordable</b>	<b>Total</b>
Housing Supply Target	22,600	20,800	43,400
Current Land Supply			30,164
Effective			22,696
Constrained			7,468
Additional land to find (+10% flexibility)			17,600

2.11 To deliver these additional 17,600 homes, three potential spatial strategies are proposed:

- Option 1: Delivery by the Council and its partners within the urban area
- Option 2: Delivery through market housing by releasing greenfield land
- Option 3: A blended approach

2.12 CEC advocates *Option 1 – Delivery by the Council and its partners within the urban area*. In support of this the Choices document identifies 275 hectares of current employment land as the only locations for future housing development.

- 2.13 The success of this approach depends upon a range of commercial factors largely out with the Council's control, indeed the Choices document specifically recognises that "*this approach may not be financially viable*" and will "*require a significant CPO programme to ensure land comes forward*".
- 2.14 It is notable that of the 275 hectares of urban land identified as potentially suitable for housing-led development, only 11 hectares is vacant and ready for development whilst only 30 hectares benefit from planning permission. The remainder of the land is currently in active alternative use – predominantly business/employment related.
- 2.15 The deliverability of these sites does not appear to have been considered in any detail by the Housing Study and remains highly speculative. Important basic information about the sites appears to be unknown - including their ownership and whether the owner is interested in selling / developing the site. Many of the areas and sites identified will be multi-owned and multi-let industrial estates, further complicating issues relating to land assembly. Despite this lack of information, the preferred option envisages these sites delivering 16,900 new homes between 2019 and 2032.
- 2.16 The priority given to urban as opposed to greenfield land is recognised as a means of making efficient use of existing infrastructure and services. However, if City Plan 2030 wishes to deliver the 67,174 homes required to meet Edinburgh's remaining housing need and demand then *Option 1 - Delivery by the Council and its partners within the Urban Area* will not realistically achieve this.
- 2.17 H&H Group Plc believe that an alternative approach must be pursued if Edinburgh's housing need and demand is to be met.
- 2.18 In response to Question 12A, H&H Group Plc has expressed support for an amended *Option 3 – A Blended Approach* which proposes a mix of urban area and greenfield land to deliver new homes. The Choices document proposes "*a mix of the urban area land (approx. 11,000 units) and greenfield land (approx. 6,600 units)*". Five potential greenfield sites are identified for housing allocation, most notably in the context of this submission Area 4 – East of Riccarton is envisaged as creating a new urban extension to Edinburgh.
- 2.19 It is clear that significantly more greenfield land will need to be allocated than is currently proposed.
- 2.20 H&H Group Plc considers that the alternative housing supply target option of 52,800 homes for the period 2019-32 must be adopted, albeit recognising that this option remains below the unmet housing need and demand from 2019 to 2032 identified by HND A2.
- 2.21 By adopting the alternative housing supply target the land to be allocated by the emerging City Plan can be calculated as follows:

Housing Supply Target	52,800
10% flexibility	5,280
Housing Land Requirement	58,080
Effective Supply	22,696
Land to be allocated in City Plan 2030	35,384

- 2.22 On this basis, City Plan 2030 will be required to allocate new housing land with an indicative capacity of 35,000 homes. Even if the delivery of 11,000 homes on urban area land is achievable, which is highly speculative, additional greenfield land with development capacity for approximately 24,000 homes would still be required.
- 2.23 Assuming that the five potential greenfield sites identified by the Choices document are released – providing indicative development capacity of 6,600 – greenfield land with capacity for a further 18,000 homes must be identified in order to meet housing need and demand during the plan period,
- 2.24 For the reasons presented, H&H Group Plc supports an alternative *Option 3 - A Blended Approach*, amended in order to allocate around 35,000 homes on both Brownfield and Greenfield sites.
- 2.25 Having clearly presented the context for the release of additional greenfield land, the remainder of this submission presents the site-specific justification for the allocation of the H&H Group Plc's landholdings at Riccarton for housing within the emerging City Plan.



### **3. SITE & SURROUNDINGS**

- 3.1 The site extends to approximately 11.94 hectares and is located to the west of the Edinburgh City Bypass immediately adjacent to the Heriot Watt University Campus. The site is shown edged in red on the accompanying site location plan (Appendix A1).
- 3.2 Riccarton Mains Road splits the site into two distinct parts – a smaller area on the west and a larger area on the east – both roughly triangular shaped. Three sets of electricity pylons (two high voltage on pylons and one low voltage on wooden poles) cross the site.
- 3.3 The larger area to the east is bound to the north and east by Baberton Road – a local public access route to a pedestrian level crossing at the railway line. The south/south-eastern site boundary is marked by the Shotts Railway Line. Its western boundary is defined by Riccarton Mains Road.
- 3.4 The smaller area to the west is bound to the north by Riccarton Mains Cottages with the roundabout providing access to the university campus beyond. Riccarton Mains Road defines the site's eastern boundary. To the immediate west of the site lies the Murray Burn, an extensive tree belt, and the Heriot Watt University Campus beyond
- 3.5 Topographically, the general gradient within the site boundary is from south-east to north-west with site levels between 85-110m AOD. To the east of Riccarton Mains Road the site is slightly undulating and generally slopes from southeast to northwest. The western portion of the site is slightly undulating, generally sloping from south to north.
- 3.6 In terms of the surrounding area, open fields generally characterise the land extending to the north and north-east of the site – stretching to Calder Road in the north and the City Bypass to the north-east. To the south, beyond agricultural land, the village of Currie is situated approximately 500m from the southern boundary of the site. The suburb of Baberton lies approximately 500m to the east, separated from the site by farmland and Baberton Golf course. To the west the surrounding area is dominated by the Heriot Watt University Campus.
- 3.7 The site location dictates that it is accessible by a range of travel modes, including active travel connections.
- 3.8 Pedestrians and cyclists can utilise the many footpaths and cycle routes in the area. Footways exist on Riccarton Mains Road linking the application site to the wider footpath/footway network. These existing links afford the potential opportunity to walk from the site to local shops and facilities.

- 3.9 There are a number of local and national cycle routes situated a short cycle from the site. The local path along Baberton Road offers direct pedestrian and cycle links to Baberton, Juniper Green, Currie and Balerno. Pedestrians can also enjoy the many walkways within Heriot Watt Campus
- 3.10 The site is in close proximity to bus stops within Heriot Watt Campus, affording access to Lothian Bus routes 25, 34, 45 and N25 which offer frequent services (approximately one every ten minutes) to and from Edinburgh. Hermiston Park & Ride is adjacent to the site, also providing frequent bus services to/from the city.
- 3.11 There are two railway stations within reasonable distance of the campus, the closest being Curriehill Station which is located approximately 1.5km to the south west of the site (c. 15 min walk / 5 min cycle) and provides an hourly service both to Edinburgh and Glasgow Central. Edinburgh Park Station is approximately 3km from the site and provides regular train and tram connections to the city centre.
- 3.12 In terms of local services and community infrastructure, local shopping facilities are available within Currie along with some provision within the university campus. The existing shops are within 15-20 minutes walking distance from the site. Regarding schools, Currie and Nether Currie Primary Schools are within 10-15 minutes walking distance from the site. Currie High School is located slightly further away, within 15- 20 minutes walking distance of the site
- 3.13 In short, whilst currently comprising agricultural land within the green belt, the site is conveniently and sustainably located within an area that is already quite strongly characterised by 'urban' elements – most notably Heriot Watt University Campus.
- 3.14 As we discuss in further detail below, the Choices document identifies *Area 4 – East of Riccarton* as a potential greenfield release site. This submission has demonstrated that additional greenfield land must be released if housing need and demand is to be met during the plan period. The necessary release at East Riccarton site will significantly alter the site's immediate surroundings which will be increasingly urbanised and dominated by residential use. In this context, the release of H&H Group Plc's land at Riccarton reflects and supports the city's emerging settlement pattern.

## 4. DEVELOPMENT OPPORTUNITY

- 4.1 The site is being promoted as a sustainable urban extension to Edinburgh. Its release from the green belt and subsequent allocation for housing-led development within City Plan 2030 can be considered logical in the context of West Edinburgh’s emerging settlement pattern.
- 4.2 It is of particular significance to note that H&H Group Plc’s landholdings – whilst not specifically identified as a potential greenfield release site by the Choices document – were assessed by the Housing Study as part of the ‘East of Riccarton’ area.
- 4.3 The Council’s Greenfield Site Assessment concluded that the East of Riccarton area – in its entirety – was suitable for development.
- 4.4 Whilst H&H Group Plc consider their land to offer significant development potential in its own right, they would note their willingness to work collaboratively with other landowners within the East of Riccarton area (notably Murray Estates and Stoddart) in support of a comprehensive and masterplanned urban extension. It is relevant to note that H&H’s landholdings were previously included within Murray Estate’s Garden District Masterplan.
- 4.5 Development within the East of Riccarton area would result in a new settlement boundary being formed beyond the City Bypass with robust and defensible green belt boundaries provided by Calder Road to the north, the Shotts Railway line to the south, and Riccarton Campus to the west.

### **Proposed Development**

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- 4.6 In its own right the site offers development capacity for approximately 350 homes (assuming a developable area of c.10 hectares and a development density of 35 units per hectare) which can be provided in a range of types and tenures including on-site affordable housing provision.
- 4.7 As part of the overall proposal the land to the west of Riccarton Mains Road offers particular potential for the development of Purpose Built Student Accommodation. H&H would note the associated representation submitted by Primus Riccarton Limited which specifically promotes the development of student accommodation on the smaller section of the site. H&H support the position presented by Primus, which is considered complementary to their overall development aspirations.
- 4.8 As required, the site could also accommodate associated ancillary uses - such as an appropriately scaled convenience retail use or community facility - capable of serving the proposed development and the wider area.

- 4.9 Development of the site will include significant landscape and open space provision, with the potential to enhancing the wider green network via appropriate connections and linkages through the site.
- 4.10 Where appropriate, woodland planting is envisaged – for example in the southern section of the site along the railway line to provide a backdrop and frame the development, or along the site’s northern boundary should mitigation be required in views from the north. Existing landscape/woodland resources, such as that present along the western boundary of the site would be retained.
- 4.11 In terms of pedestrian and cyclists, significant potential exists for a range of ‘active travel’ improvements which would enhance connections with the surrounding area. For example, improved integration with Riccarton Campus, direct links with the access path along the site’s northern and eastern boundaries which serves as a route to/from West Edinburgh, Baberton and Juniper Green, enhancements to footway provision and improvements to street lighting along Riccarton Mains Road to provide a walking/cycle route between Currie (local services, schools etc) to the south and Hermiston Park & Ride to the north.
- 4.12 Given the site’s close proximity to existing bus and rail services, enhanced pedestrian/cyclist routes will improve access to established infrastructure, while opportunities exist to improve the accessibility of bus services by providing new bus stops on Riccarton Mains Road or potentially within the development itself.
- 4.13 Vehicular access to both sections of the site can be achieved from Riccarton Mains Road, multiple opportunities exist to access the larger eastern area of the site while appropriate access arrangements to serve the smaller western area can be provided.

### **Site Effectiveness**

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- 4.14 PAN2/2010: Affordable Housing and Housing Land Audits contains specific criteria for the assessment of a site’s ‘effectiveness’. The site’s effectiveness, when considered against these criteria, can be summarised as follows:

**Ownership:** H&H Group Plc owns the land. Upon securing an LDP allocation an application for planning permission can be expected in the short-term, resulting in development during the Plan period.

**Physical:** There are no physical constraints that would undermine the site’s viability for development. There are no constraints in terms of ground conditions. There are no historic records of mine or mineral workings and the risk of contamination is negligible.

**Public Funding:** No public funding would be required to make residential development viable.

**Deliverability:** There are no delivery constraints affecting the site. West Edinburgh is an area of extremely high housing demand where supply has failed to keep pace – in particular the supply of family housing. These factors will ensure the site's development for predominantly family housing will be delivered within the plan period.

**Infrastructure:** There are no infrastructure constraints. Water supply, drainage, education capacity, electricity and telecoms are all either available or can be made available.

**Use of Land:** Housing (private and affordable) will be the primary use of the land.

- 4.15 In short, the site is 'effective' when assessed against the PAN 2/2010 criteria. H&H Group Plc are committed to the delivery of this site, subject to its allocation within the emerging Local Development Plan and securing all necessary statutory consents.

### **Summary**

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- 4.16 The site – individually or as part of a wider 'East of Riccarton' development solution - represents a realistic and deliverable opportunity for a sustainable and integrated settlement expansion.
- 4.17 The site is effective and capable of accommodating residential development in line with key policy objectives. Its development would be progressed in a logical and sensitive manner, consolidating the emerging settlement pattern and affording Edinburgh an improved, robust and defensible Green Belt boundary

## 5. RESPONSE TO GREENFIELD SITE ASSESSMENT

5.1 This section provides commentary on and responds to the 'Greenfield Site Assessment' presented by the City Plan 2030 Housing Study (Part 2b, p160-162).

5.2 As previously noted, the site forms part of the 'East of Riccarton' assessment area. Given its importance in the context of this submission, the conclusion of the Council's Site Assessment is reproduced in full below:

*"The site is considered suitable for development, despite not being within the SESplan Strategic Development Areas as set out in its spatial strategy, and poor accessibility in the short/medium term. The site should be considered as an urban extension between the City of Edinburgh Bypass and Riccarton. Any development should have regard to areas of flood risk, potential blue/green infrastructure, the improvement of Riccarton Mains Road for active travel and public transport users and improving access across the Bypass to the existing urban area. Although public transport access remains relatively poor in the short term and major intervention is only expected post-plan, the site is located adjacent to the Hermiston Park and Ride site and some high frequency bus services serve the area. As the site is not within the SESplan spatial strategy it should be considered as a reasonable alternative to other sites within the Strategic Development Areas.*

*Development of the site will result in a new settlement boundary beyond the Bypass formed by the railway line, Riccarton and Calder Road/Hermiston and opportunities to enhance screening by tree planting in relevant areas should be considered, particularly where the site faces the Bypass although there may also be scope for non-housing land-uses to act as a buffer to the Bypass. Accessibility improvements are required to enable development, and a new crossing over the Bypass to Wester Hailes would be required as well as improvements to Riccarton Mains Road and Calder Road to improve walking and public transport. The masterplan for the site should have regard to a potential long-term major public transport intervention to serve the wider area. A strategy for moving or undergrounding the overhead power lines should be investigated to improve the development potential in this area, if not appropriate uses should be found for the land below these lines. As part of the development of a wider strategic green network, connections should be made to the area of medium-high flood risk within the site, associated with the Murray Burn, which is identified as a potential landscape-scale component of the network. The level of development proposed here and in adjacent sites would require three new non-denominational primary schools, one new roman catholic primary school and one new nondenominational secondary school. There would be a partial requirement for a new Roman Catholic secondary school to address growth here and citywide. **These requirements should be co-ordinated through a brief for this site (CEC emphasis)**"*

5.3 H&H Group Plc welcomes this conclusion which expressly recognises:

- the suitability of the East of Riccarton area, in its entirety, for development;
- that the East of Riccarton area should be considered as *“an urban extension between the City of Edinburgh Bypass and Riccarton”*;
- that *“development of the site will result in a new settlement boundary beyond the Bypass formed by the railway line, Riccarton and Calder Road/Hermiston”*;
- *a range of access, public transport, community infrastructure and landscape interventions to support and enhance the site’s development*;
- *the benefits of a masterplan / development brief approach to the wider site’s development*

5.4 Given these very clear and definitive conclusions H&H Group Plc queries why Map 17 within the Choices document, which defines Area 4 – East of Riccarton, does not include their landholding as part of the potential greenfield release. It is requested that this error be rectified, and the East of Riccarton boundary amended to include the site.

5.5 We now provide commentary in response to the Council’s analysis under the specific site assessment criteria:

#### **SDP1 SDA AREAS**

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

5.6 The site is not located within an identified Strategic Development Area (SDA).

5.7 It is recognised that both the Strategic and Local Development Plans identify SDAs as the primary focus for the city-region’s growth, however there is an essential requirement to release additional greenfield land at a scale over and above that which can be provided within Edinburgh’s SDAs in order to meet housing need and demand

5.8 In support of this, appropriate and effective land out with Strategic Development Areas, such as the site, should be identified for housing-led development

## ACTIVE TRAVEL

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

- 5.9 The Council concludes that the site 'partially' supports travel by foot to identified convenience services, their partial support being based upon the fact that "*convenience services can be provided on site due to the scope of development*".
- 5.10 It is agreed that convenience services can be provided on site. As noted above, appropriately scaled convenience facilities could be provided on H&H Group's land (if progressed independently) or within the wider East of Riccarton area (if progressed on comprehensive masterplan basis).
- 5.11 The Site Assessment suggests that the site is not within walking distance to local convenience stores. This conclusion is questioned.
- 5.12 Planning Advice Note (PAN) 75 'Planning for Transport' states that '*A maximum threshold of 1600m for walking is broadly in line with observed travel behaviour for accessibility to local facilities by walking and cycling*'. Local shopping is available within Currie with some provision within the university campus. Local Facilities within Currie e.g. Library, Medical Centre, Co-Op foodstore/local shops are all within a 15-20 minute walk from the site i.e. within the 1,600m maximum threshold advocated by PAN 75. It is acknowledged that the pedestrian environment along Riccarton Mains Road which connects the site with Currie requires improvement, again this is something that could be addressed as part of any future development proposal.
- 5.13 On balance, the site supports travel by foot to identified convenience services.

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

- 5.14 The Site Assessment note's partial compliance with this requirement. The Council's acknowledgement that the site is within walking distance of employment clusters is noted and welcomed. As above, it is recognised that the pedestrian environment along Riccarton Mains Road / Curriehill Road could be improved however to suggest it forms a barrier to the Riccarton employment cluster appears to overstate the current situation. Appropriate enhancements to pedestrian connectivity are envisaged by future development.
- 5.15 It is considered that the site supports travel by foot to identified employment clusters.



***Does the site have access to the wider cycle network?***

- 5.16 The site assessment concludes that the site does have access to the wider cycle network but this *“impeded by the Union Canal cycle path which is considered at capacity”* and suggests that access is unlikely to be improved as no suitable interventions have been identified which could serve the site. Specific reference is made to the City Bypass forming a barrier to connections with the West Edinburgh Cycle Link Intervention
- 5.17 There are established cycle routes running east to west both to the north and south of the development site. Both form part of the National Cycle Routes (NCR) 75 and 754 - long distance routes connecting the east and west coast of Scotland including Edinburgh and Glasgow.
- 5.18 Locally the NCR75 runs east to west along the alignment of the Water of Leith, providing a route from Currie to Livingston in the west and a largely traffic free route towards Edinburgh in the east.
- 5.19 NCR754 lies around 1-1.5km north of the site and follows the route of the Union Canal, providing further links into Edinburgh and west toward Broxburn and Linlithgow. No evidence has been provided to support the assertion that the cycle path along the Union Canal is at capacity.
- 5.20 In addition to these National Cycle Routes there are other local routes within the Heriot Watt Campus (providing a link to NCR 754 to the north) and an additional local route south of the railway linking towards Currie and Juniper Green.
- 5.21 The Site Assessment also states that *“no other suitable potential cycle route interventions have been identified which could serve the site”*. This is only partially correct. Whilst connections to the West Edinburgh Cycle Link Intervention are potentially challenging, the proposed A71 Cycle Super-Highway may provide an alternative route to the cycle path alongside the Union Canal. The A71 Cycle Super-Highway proposal represents a key strategic link in the region’s network – linking South Livingston with Balerno, Currie and West Edinburgh, its creation is identified as an opportunity within SEStran’s ‘Strategic Cross Boundary Cycle Development’ document (2015) and is a strategic aspiration within the SESplan area. Given this background, it is disappointing that the Site Assessment has failed to recognise and account for what is a potentially significant cycle route intervention.
- 5.22 In short, the site is accessible (via a short cycle) to two National Cycle Routes in addition to local routes. Future development of the site will make provision for improved and enhanced connectivity to such routes. It is also the case that potential cycle route intervention could serve the site in future.
- 5.23 The site is demonstrably accessible to the wider cycle network.

***Can the site support active travel overall through appropriate intervention?***

- 5.24 In terms of active travel, the assessment's overall conclusion is "*the site does not support active travel overall, as the site is not within walking distance of local convenience services and these are unlikely to be provided through development due to lack of scope for development nearby. Access to the wider cycle network is poor and would require a bridge connection to the West Edinburgh Link cycle intervention to improve this, which is not committed.*
- 5.25 For the reasons presented we disagree with the conclusion, it is considered that the site supports active travel and the findings of the Site Assessment should be reconsidered accordingly.

**PUBLIC TRANSPORT**

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

- 5.26 Bus services operate along Riccarton Mains Road though at present there are no stops along the site frontage with the closest existing stops being located within the University Campus, south of the railway line in Currie and at the adjacent Hermiston Park & Ride facility.
- 5.27 Lothian bus service 45 is the service which operates along Riccarton Mains Road with additional services 25, 34 and 63 serving the Park & Ride and University Campus.
- 5.28 The presence of services on Riccarton Mains Road means that all of the site area is within 400m of a bus route, as laid out in Scottish Planning Policy.
- 5.29 As noted, there are two railway stations within reasonable distance of the site, the closest being Curriehill Station which is located approximately 1.5km to the south west (c. 15 min walk / 5 min cycle). Edinburgh Park Station is approximately 3km from the site and provides regular train and tram connections to the city centre.
- 5.30 Overall, contrary to the conclusion of the site assessment, it is evident the site supports travel by public transport through existing public transport network accessibility and capacity.

***Is the site potentially served by an identified public transport intervention project which is deliverable in the plan period to serve and accommodate development?***

- 5.31 As above, the site is already supported by existing public transport provision.

- 5.32 The Assessment notes that the “*site may support travel by public transport based on an identified intervention, but this intervention is not deliverable within the plan period*”. It is assumed that the intervention referred to is the proposed extension to the Hermiston Park and Ride Facility, as identified within the Local Development Plan Action Programme (February 2020).
- 5.33 The Action Programme does not provide an estimated delivery date for this intervention, however given the site is adjacent to Hermiston Park and Ride once delivered the existing public transport provision which supports the site will be even further enhanced.

## **COMMUNITY INFRASTRUCTURE**

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

- 5.34 The assessment concludes that the site does not currently have sufficient primary school capacity - this conclusion relates to the entirety of the East of Riccarton Area.
- 5.35 Looking at H&H Group’s landholdings independently, it is appropriate to reference a recent report on ‘School Roll Projections and Rising School Rolls’ which was presented to the Council’s Education, Children and Families Committee on the 3<sup>rd</sup> March 2020. The School Roll Projections presented cover the period 2019-2029 and take account of planned LDP developments.
- 5.36 The report indicates that Currie Primary School is currently operating under capacity and is not projected to exceed capacity at any point in the period 2019-2029, by 2026 the projections indicate capacity for c.100 pupils. It is also the case that in March 2018 planning permission was granted for *construction of a new educational building with 8 (eight) classrooms and ancillary accommodation, within the grounds of Currie Primary School (17/05182/FUL)*. Currie Primary School offers sufficient capacity to accommodate a significant scale of development.
- 5.37 In terms of denominational schools, St Cuthbert’s RC Primary School currently operates under capacity, albeit only slightly, and is not projected to exceed capacity during the period 2019-29.
- 5.38 Using the Council’s own school roll projections were the site to come forward independently it would appear that sufficient primary school infrastructure capacity exists to accommodate the development.
- 5.39 In the event that the entirety of the East of Riccarton area comes forward in a comprehensive manner it is accepted that insufficient primary school infrastructure exists without intervention. Given the scale of development involved in such a proposal, as recognised by the Choices document, scope exists for on-site education solutions.

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

- 5.40 Again, taking the entirety of the East of Riccarton into the account, the assessment concludes that the site does not currently have sufficient secondary school capacity. It is acknowledged that if the entirety of the East of Riccarton area were to come forward then site-specific interventions would be required to serve this strategic-scale development.
- 5.41 Considering the site independently, the Council's March 2020 School Roll Projections and Rising School Rolls' report indicates that Currie High School currently operates under capacity and is not projected to exceed its capacity during the period 2019-29.
- 5.42 Currie High School is due to be replaced during the plan period, it is proposed to increase capacity from its existing 900 to 1000. This additional capacity is not reflected in the Council's roll projections, it is understood that scope exists to further increase this notional capacity as required.
- 5.43 In terms of St Augustines High School it is under capacity at present, with projections indicating it is likely to be over capacity by 2023.
- 5.44 Overall, it would appear that sufficient non-denominational high school capacity exists to accommodate development of the site. Intervention may be required to address denominational capacity issues

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

- 5.45 The assessment notes only partial compliance with this criterion however it is apparent that solutions are available both on an 'East of Riccarton wide' and individual site basis.
- 5.46 The site's release from the green belt and allocation for housing-led development within the emerging City Plan will allow it to be included within education capacity considerations and to contribute towards a planned, appropriately phased and sustainable solution to education infrastructure within the Western part of the city.

## LANDSCAPE CHARACTER

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

- 5.47 The site assessment concludes that *“Scope for development on this site is identified due to the lack of scenic views across the site, lack of contribution to the setting of the city and less rural character compared to other landscapes, and the settlement pattern of Currie already being disrupted by development at Baberton. Although it is beyond the robust settlement boundary formed by the City of Edinburgh Bypass, opportunities to create new boundaries exist to the west and south. Overhead power lines form a constraint to development here”*.
- 5.48 H&H Group agrees with this conclusion and welcomes the Council’s acknowledgement that development of the site would maintain the identity, character and landscape setting of the settlement and prevent coalescence. It is not agreed that overhead power lines represent a constraint to development.

## GREEN NETWORK

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### ***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?***

- 5.49 The site assessment notes partial compliance with this requirement on the basis that East of Riccarton site is located within an area identified as a green network opportunity (therefore its development would result in loss), but this is offset by the significant opportunities for green network enhancements and connections associated to future development.
- 5.50 H&H Group largely agree with this analysis and conclusion.

## FLOOD RISK

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### ***Would development of the site avoid identified areas of ‘medium-high flood risk’ (fluvial) or areas of importance for flood management?***

- 5.51 With respect to the overall East of Riccarton site, the assessment concludes that *“part of the site is covered by an area of medium-high flood risk and area of importance for flood management, although this does not cover a substantial area of the overall site. The site can still be developed while avoiding these areas to mitigate major flood risk, and opportunity exists to incorporate this within development as part of the strategic green network”*. On this basis it is clear that flood-risk offers no barrier to development progressing.

5.52 In terms of H&H Group's landholding, the site does not lie within a SEPA identified area of medium-high flood risk. Neither is the site at significant risk of flooding from surface water runoff or groundwater. In terms of flood risk, the site is demonstrably suitable for development.

## **SUMMARY**

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5.53 The Site Assessment concludes that 'East of Riccarton' is suitable for development – H&H Group Plc welcomes and agrees with this conclusion.

5.54 This statement has critiqued the Site Assessment and, despite its positive overall conclusion, specific conclusions in relation to active travel, public transport and community infrastructure appear to be unjustifiably negative. It is requested that these aspects of the assessment be reconsidered.

5.55 H&H Group Plc has presented a clear and considered vision for the future development of their site. Overall, upon detailed consideration of all key assessment criteria, it can be reasonably be concluded that either individually or as part of the wider East of Riccarton area it represents a suitable site for housing-led development and should be released from the green belt accordingly.

## 6. CONCLUSION

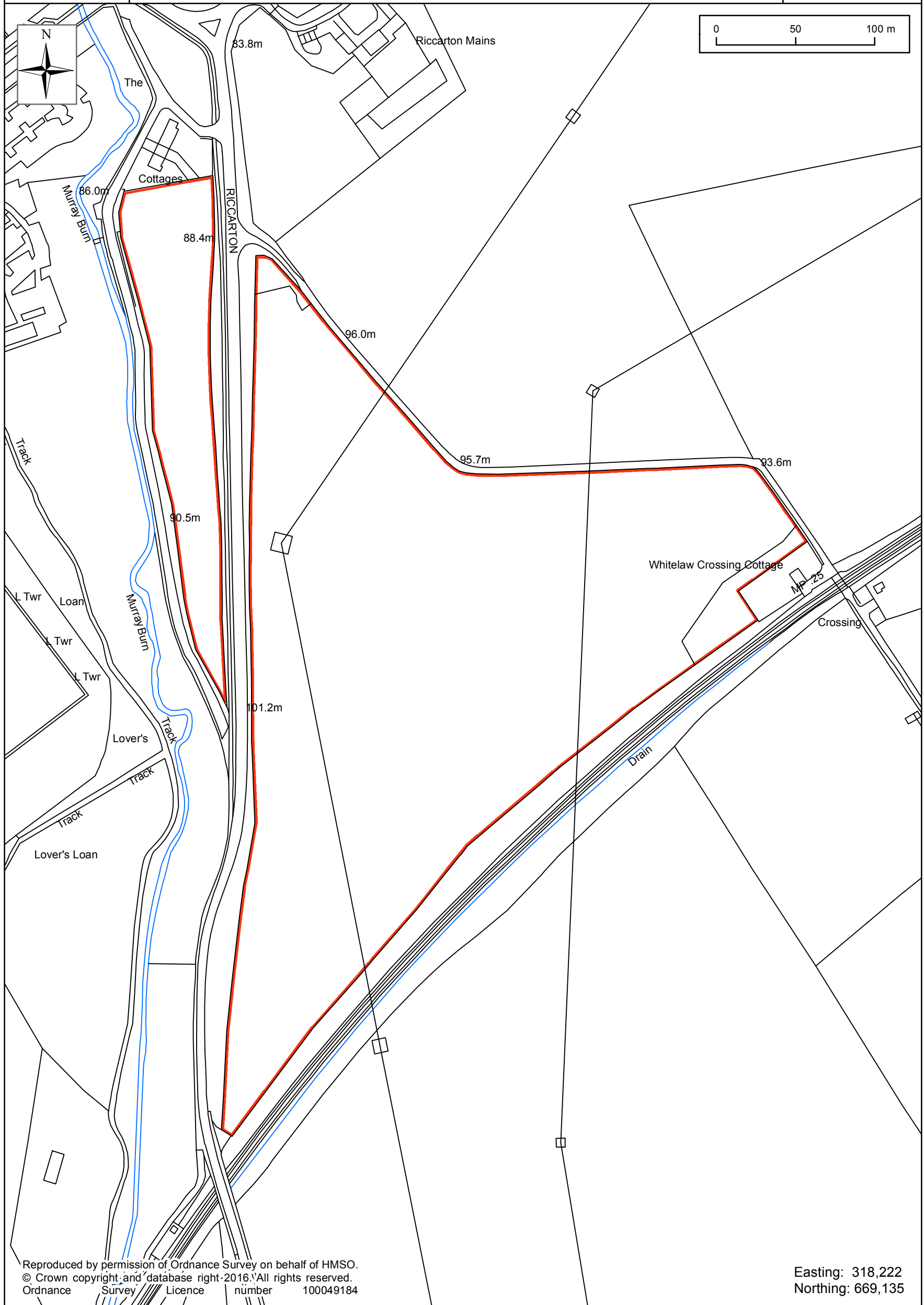
- 6.1 Analysis of the Choices for City Plan 2030 document, and in particular its approach to meeting housing need and demand during the City Plan period, indicates that an alternative approach is required.
- 6.2 This submission has demonstrated that City Plan 2030 will be required to allocate new housing land with an indicative capacity of 35,000 homes. The Choices document's preferred option of '*Delivery by the Council and its partners within the urban area*' will not realistically achieve this.
- 6.3 Instead, H&H Group Plc supports the adoption of an alternative '*Blended Approach*' from that presented by the Choices document in order to allocate around 35,000 homes on both Brownfield and Greenfield sites.
- 6.4 This will necessitate the release of additional greenfield land for housing-led development, the scale of the requirement is such that land both within and out with SDAs must be identified.
- 6.5 This submission has demonstrated that H&H Group's land at Riccarton represents an effective site capable of accommodating housing-led development alongside complementary uses including purpose built student accommodation on land to the west of Riccarton Mains Road.
- 6.6 The site is capable of delivering much needed housing development within the City Plan period, and has the potential to come forward independently or as part of a strategic scale 'East of Riccarton' release
- 6.7 For the reasons presented by this submission, it is respectfully requested that the site be released from the green belt and allocated for housing-led development within emerging City Plan 2030.



# Land at Riccarton Mains, Hermiston, Edinburgh

PZ144876/RC  
April 2016

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@A3



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Easting: 318,222  
Northing: 669,135