

Customer Ref: 01694 Response Ref: ANON-KU2U-GWU4-E  
Name Colliers International  
Response Type Agent / Consultant  
On behalf of: Mactaggart and Mickel Ltd

Supporting Info  
Email jessica.powell@colliers.com

Choice 1 A

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

Short Response Yes

**Explanation** A new policy in the forthcoming LDP which takes account of connecting places, parks and greenspaces is supported by Mactaggart & Mickel (M&M) as these contribute to both health and well-being. Encouragement for walking, cycling and sport are generally supported.

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 Yes

**Explanation** In planning for any development, M&M recognise the inclusion of green and blue infrastructure, providing appropriate open space, trees and utilising Sud's for their aquatic/ecological habitats and bio-diversity.

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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

Choice 1 E

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

Short Response

Explanation

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Choice 1 F

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

Short Response

Explanation

Choice 1 F

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

Short Response

Explanation

Choice 1 G

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

Short Response

Explanation

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Choice **1 H**

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

Short Response

Explanation

Choice **2 A**

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

Short Response

Explanation M&M are committed to any development that they undertake in Edinburgh. Creating a great new place and contributing to existing communities is an important aspect of their work. M&M are proud of their 95 years' experience of home building in Edinburgh and the legacy that this bestows as Scottish housebuilders of a fine reputation and high standards. M&M support a consistent approach to determining applications for new buildings and places, this is considered essential. Accessibility for their residents is at the forefront of their design/layout process, and is evidenced in a supporting design and access statement with a planning application. The proposed further densification of development to a minimum 65 units per hectare is ambitious and M&M question whether this will allow for the provision of a full tenure range and choice of housing across a development. Perhaps this proposed standard could be applied to urban brownfield sites, with the application of a lesser density range from 50-65 units per Ha for greenfield land releases, in sustainable locations, which are close to public transport and active travel routes. M&M will ensure that their development proposals include streets, a road layout and a sense of place which reflects the Street Design Guidance in Edinburgh and meets the SPP six qualities of a successful place, namely; • Safe • Pleasant • Easy to move around • Welcoming • Adaptable • Energy efficient

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Choice **2 B**

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

Short Response

Explanation

Choice **2 C**

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

Short Response

Explanation

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

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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

**Explanation** M&M recognise that there is a requirement to reduce carbon emissions through good design and the use of low and zero carbon generating technologies. We note the Council's aim for all buildings in Edinburgh to be zero carbon by 2030 and that 50% of the carbon reduction target should be met through low and zero carbon generating technologies. However, M&M believe that emissions standards for new buildings should continue to be regulated under the building standards system and not the planning system, as this would cause needless duplication. The current focus should be to maximise the efficiency of the existing planning resource. Therefore, apart from an overall CEC view of seeking to achieve carbon neutral buildings, this should not result in a bespoke planning policy in the LDP.

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** The ambition of CEC to have Place Briefs prepared in conjunction with local communities in all new housing sites is a significant increase in consultation requirements, especially for those sites below 2Ha in size and which are not major applications in the planning hierarchy of development. It is considered that Place Briefs are best suited to strategic sites and that education, transport and infrastructure provision is best led by expert advice and evidence. There also requires to be a leading role for landowners and developers in the preparation of Place Briefs. The new Planning Act allows for Local Place Plans (LPP) to be prepared by local communities and set proposals for development of land of particular significance to a local area. However, it should also be highlighted that the LPPs require to adhere to the LDP.

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Choice **4 B**

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

Short Response

Explanation

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** M&M concur with the CEC view that directing development to where there is existing or under-utilised infrastructure is sensible. If new infrastructure is required, improvements are sought and investment needed, then this requires to be guided by Planning Circular 3/2012 – Planning Obligations and the associated tests, in order for a planning agreement (section 75) to be entered into between a developer and the Council. A developer contribution must be proportionate and directly relevant to the development proposal. M&M concur with the CEC view that directing development to where there is existing or under-utilised infrastructure is sensible. If new infrastructure is required, improvements are sought and investment needed, then this requires to be guided by Planning Circular 3/2012 – Planning Obligations and the associated tests, in order for a planning agreement (section 75) to be entered into between a developer and the Council. A developer contribution must be proportionate and directly relevant to the development proposal. In terms of Healthcare Infrastructure, it is considered that the planning of future health care services is a matter the NHS Lothians to address and not developers. Subsequently, contributions should not be sought. A M&M development proposal would take full account of its transport impact and this would be detailed as a supporting report for a planning application on an M&M development site. M&M aim to promote landholdings that are located in sustainable locations where there are nearby walking routes of public transport provision.

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Choice 5 B

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

Short Response

Explanation

Choice 5 C

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

Short Response

Explanation

Choice 5 D1

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

Short Response

Explanation



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Choice 5 D2

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

Short Response

Explanation

Choice 5 E

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

Short Response

Explanation

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

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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

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 M&M are committed to utilising good public transport options, supporting walking/cycling, providing access to car clubs, shared mobility, which each provide less need to own a car. Determining car parking levels based on the area of the city and development type are also important considerations. M&M consider that this Choice should be merged with the preceding Choice as there is significant duplication on this subject and a single policy response will be clearer.

Choice **7 B**

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

Short Response

Explanation

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Choice **7 C**

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

Short Response

Explanation

Choice **7 D**

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

Short Response

Explanation

Choice **8 A**

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

Short Response

**Explanation** The aim to provide new walking and cycling routes is laudable. M&M believe that a review of the entire cycle/footpath network in the city should be undertaken, and where deficiencies or improvements are identified these should be highlighted. Any request for development to contribute to provision of new routes should be proportionate and relevant to the development proposal, as well as meeting all the tests of Circular 3/2012.

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Choice **8 B**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

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

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Choice 9 A

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

Short Response

Explanation

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

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Response Type

Agent / Consultant

On behalf of:

Mactaggart and Mickel Ltd

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

Not Answered

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

Not Answered

Explanation

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Choice 11 A

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

Short Response: No

**Explanation**  
Whilst the Council's aspiration to build 20,000 affordable homes is noted and considered commendable, the aim to increase the affordable housing requirement from 25% to 35% requires to be carefully considered. Addressing affordability will require subsidised affordable housing, but this should not be seen as the only policy lever necessary to address the issue. The focus requires to be on providing more housing of all tenures. Edinburgh needs to be building more homes of all tenures, otherwise, pressures on affordability will continue. If new housing supply continues to be inadequate to satisfy housing need and demand it will continue to place upwards pressure on affordability. Edinburgh has failed to adequately plan to meet the housing need and demand it has itself identified in its own evidence. When housing supply targets were belatedly produced to support SESplan 1 in November 2014, the 2009-24 target for Edinburgh was just 61% of the figure set out in the Housing Need and Demand Assessment (HNDA, Table 5.1.2). The now abandoned SESPlan 2 only set out to meet 39% of need and demand arising between 2012-30 in Edinburgh. It is unsurprising, though regrettable that this failure to plan to meet need and demand properly appears to be influencing some of the problems which are identified in the Main Issues Report. M&M believe that the 25% level of affordable housing should remain for urban brownfield sites, on the basis of viability. They are willing to support a further 10% affordable housing on greenfield sites raising it to the Council's desired 35%, but on the conditional basis this additional 10% is not social provision, but discounted/low cost home ownership affordable housing.

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**

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Choice 12 A

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

Short Response: Option 3 (Blended)

**Explanation**

There is a recognition by the Council that they need to provide new homes in Edinburgh and allocate land for new homes. M&M are of the view that the Council, in accordance with the provisions of the new Planning Act and forthcoming NPF4 require to meet their housing requirement in full. The last approved South East Scotland (SESPlan) Strategic Development Plan (SDP) is dated from 2013 and does not break down housing requirements by local authority area beyond 2024. The evidence base for this MIR is therefore dated. We do concur that under the circumstances, with SESPlan2 being rejected by Scottish Ministers in 2019, it is reasonable that the Edinburgh target is set using the more updated HNDA 2 (2015). M&M support the Council's aim to provide over 20,000 affordable homes to 2032. Choices 2030 sets out two options for a housing target, as follows: 1. Preferred Option: 43,400 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HMDA 2 Wealth Distribution Scenario less completions between 2012 and 2019. 2. Alternative Option: 52,800 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HMDA 2 Wealth Distribution Scenario less completions between 2012 and 2019. Both options fall some way short of meeting housing need and demand in full. The preferred option would meet just 65% of identified need and demand in the HNDA 2 Wealth Distribution Scenario. The alternative option would meet 79% of identified need and demand in the HNDA 2 Wealth Distribution Scenario or 65% of the Strong Economic Growth Scenario. Choices 2030 and the Housing Study do not adequately justify why housing need and demand cannot be met in full. There is a reference to the other factors involved in setting the housing target in SPP (para. 115), but it is not explained in any detail why a downward adjustment from the HNDA output is considered to be justified. This is an important point given the historic severe undersupply of housing and housing land in Edinburgh and merits further significant attention. The alternative target of 52,800 homes is discounted because it is argued that the supporting evidence to the HNDA suggested the Strong Economic Growth Scenarios was unrealistic. However, this evidence was produced in 2013 (Oxford Economics reference) and applied to the whole SESPlan region. M&M do not consider that these conclusions remain relevant to Edinburgh in 2020 or indeed the next decade to 2030. Taking these factors into consideration we consider that the higher Housing Supply Target (HST) of 52,800 between 2019-32 is the most appropriate target. This equates to approximately 79% of the middle HNDA output. The Edinburgh housing market has self-containment in moves of between 81% and 90%. 79% is close to the lower threshold, but the unmet need and demand will need to be met elsewhere. M&M believe that the CEC should review the submissions to the MIR and then seek to ascertain how the land required for the full range of housing provision is met. To outline that land will either be provided by the Council and its partners or through an alternative and unsupported 'market housing led' is a dogmatic approach that does not reflect the collaboration needed, to ensure all housing tenure provision is provided for in full, in Edinburgh, over the next decade. As the nation's capital and an economic powerhouse for the Scottish economy, greater ambition is required by CEC to house its citizens and rising population, obfuscation and dereliction of responsibility are no longer acceptable. To deliver new homes in the most sustainable manner, CEC have expressed a preferred option of these being delivered by the Council and its partners within the urban area, a brownfield sites approach. M&M recognise the importance of reusing previously developed land as a key objective of the planning system and have undertaken many developments of this nature themselves. However, when the Council then outline that to meet their preferred housing requirement they



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require 275 Ha of urban land and that only 11 Ha is currently available for development and the remainder is currently in use as employment land, then the credibility and deliverability of their preferred strategy requires to be significantly questioned. This is a route that, if followed, will ensure that there is another decade of under provision of housing within Edinburgh. This is unacceptable. M&M believe that a balanced approach is required with a combination of brownfield and greenfield sites coming forward over the next decade to maximise the prospects of Edinburgh delivering the full range of homes it needs for its residents. To meet the 52,800 (+ 10% generosity margin = approximately 58,000) unit requirement favoured by M&M, this equates to 4,060 units per annum. With a current land supply of just over 30,000 units, historic brownfield completions of 850 per annum, this equates to a further 11,000 homes to 2032, requiring approximately 17,000 homes to be allocated through the release of greenfield land in Edinburgh. M&M believe that this will require deliverable sites from all tenure options to ensure that the housing requirements of the city are met in full. M&M have a short term, under five years, deliverable site in Liberton for approximately 100 units. A short term greenfield land release site of this nature will provide Edinburgh with the housing it requires and maximise its prospects of meeting its housing demand. The site specific details of this landholding will be covered in section 4 of the attached submission.

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

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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

Choice **12 B5**

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

Short Response

Explanation

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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

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 Not Answered

Explanation

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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 Not Answered

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 Not Answered

Explanation

Choice 12 BX

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

Short Response Not Answered

Explanation

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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

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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

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

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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** Edinburgh fortunately benefits from a healthy range of local, town and thriving city centre. M&M support the policy option to seek to strengthen local and town centres, as these are often in sustainable locations with good transport connections that provide a range of goods, services and community facilities. It is considered important that they maintain their vitality, viability and deliver good placemaking.

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

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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

Not Answered

Explanation

Choice 15 E

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

Short Response

Not Answered

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

Not Answered

Explanation

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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

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

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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

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

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **16 B**

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

Short Response

Explanation

Choice **16 C**

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

Short Response

Explanation

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

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 E2

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

Short Response

Explanation

Choice 16 E3

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

Short Response

Explanation

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

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 E8

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

Short Response

Explanation

Choice 16 EX

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

Short Response

Explanation

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

Customer Ref: 01694      Response Ref: ANON-KU2U-GWU4-E  
Name: Colliers International  
Response Type: Agent / Consultant  
On behalf of: Mactaggart and Mickel Ltd

Supporting Info:   
Email: jessica.powell@colliers.com

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: Not Answered

Explanation: Not Answered

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





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# City of Edinburgh Council Main Issues Report – Choices for City Plan 2030

MARCH 2020

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COLLIERS INTERNATIONAL

MACTAGGART & MICKEL LTD

LIBERTON, EDINBURGH

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# 1 INTRODUCTION

## 1.1 OVERVIEW

Mactaggart & Mickel Ltd welcome the opportunity to comment on the City of Edinburgh Council's Main Issues Report (MIR) – 'Choices for City Plan 2030', which is subject to consultation until 31<sup>st</sup> March 2020.

Mactaggart & Mickel are a Scottish housebuilder with 95 years' experience of designing, constructing and delivering homes in Edinburgh and indeed throughout Scotland. It is with this practical knowledge and experience that Mactaggart & Mickel comment on the MIR for Scotland's Capital City.

A review of the strategic and preferred choices by the City of Edinburgh Council intimated in the published 'Choices for City Plan 2030' will be evaluated and commented upon by Mactaggart & Mickel in this submission.

Mactaggart & Mickel are seeking to advance a landholding that they control in Liberton, Edinburgh and site-specific information supporting this location is provided within this submission at Section 4. A review of the Council's assessment of this landholding in their Housing Study will also be undertaken.

The aim of the Mactaggart & Mickel submission to the MIR will be to usefully inform and provide the Council with their views, to allow the Local Development Plan for Edinburgh to come forward and provide the much needed new homes required in the city over the next decade. The delivery of new homes in Scotland's Capital City over the next 10 years is imperative to the growth of the economy and to ensure that Edinburgh can house its citizens in sustainable locations whilst taking full account of environmental considerations from the outset.

## 2 SCOTTISH PLANNING POLICY (SPP)

### 2.1 CONTEXT

The purpose of the SPP is to set out national planning policies which reflect Scottish Ministers' priorities for the operation of the planning system and for the development and use of land. It is non-statutory, but the SPP is a material consideration that carries significant weight.

The SPP focuses on plan making, planning decisions and development design to deliver the Scottish Government's purpose of creating a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth.

Scottish Ministers expect the planning service to perform to a high standard and to pursue continuous improvement. The service should:

- focus on outcomes, maximising benefits and balancing competing interests;
- play a key role in facilitating sustainable economic growth, particularly the creation of new jobs and the strengthening of economic capacity and resilience within communities;
- be plan-led, with plans being up-to-date and relevant;
- make decisions in a timely, transparent and fair way to provide a supportive business environment and engender public confidence in the system;
- be inclusive, engaging all interests as early and effectively as possible;
- be proportionate, only imposing conditions and obligations where necessary; and
- uphold the law and enforce the terms of decisions made.

For planning to make a positive difference, development plans and new development need to contribute to achieving a successful, sustainable place by supporting sustainable economic growth and regeneration, and the creation of well-designed, sustainable places. The SPP introduces a presumption in favour of development that contributes to sustainable development.

## 2.2 LOCAL DEVELOPMENT PLANS

The SPP sets out the overall aims of the Development plan which should:

- be consistent with the policies set out in this SPP, including the presumption in favour of development that contributes to sustainable development;
- positively seek opportunities to meet the development needs of the plan area in a way which is flexible enough to adapt to changing circumstances over time;
- support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area;
- be up-to-date, place-based and enabling with a spatial strategy that is implemented through policies and proposals; and
- set out a spatial strategy which is both sustainable and deliverable, providing confidence to stakeholders that the outcomes can be achieved.

In developing the spatial strategy, planning authorities should identify the most sustainable locations for longer-term development and, where necessary, review the boundaries of any green belt.

In enabling the delivery of new homes, the planning system should:

- identify a generous supply of land for each housing market area within the plan area to support the achievement of the housing land requirement across all tenures, maintaining at least a 5-year supply of effective housing land at all times;
- enable provision of a range of attractive, well-designed, energy efficient, good quality housing, contributing to the creation of successful and sustainable places; and
- have a sharp focus on the delivery of allocated sites embedded in action programmes, informed by strong engagement with stakeholders.

Plans should be informed by a robust housing need and demand assessment (HNDA). This assessment provides part of the evidence base to inform both local housing strategies and development plans (including the main issues report). It should produce results both at the level of the functional housing market area and at local authority level, and cover all tenures. Plans should address the supply of land for all housing. The housing supply target is a policy view of the number of homes the authority has agreed will be delivered in each housing market area over the periods of the development plan. The target should be reasonable, should properly

reflect the HNDA estimate of housing demand in the market sector, and should be supported by compelling evidence.

Local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. In allocating sites, planning authorities should be confident that land can be brought forward for development within the plan period and that the range of sites allocated will enable the housing supply target to be met.

Local development plans should allocate appropriate sites to support the creation of sustainable mixed communities and successful places and help to ensure the continued delivery of new housing.

## 3 CHOICES FOR CITY PLAN 2030

### 3.1 CHOICE ONE - EDINBURGH, SUSTAINABLE, ACTIVE AND CONNECTED

A new policy in the forthcoming LDP which takes account of connecting places, parks and greenspaces is supported by Mactaggart & Mickel (M&M) as these contribute to both health and well-being. Encouragement for walking, cycling and sport are generally supported.

In planning for any development, M&M recognise the inclusion of green and blue infrastructure, providing appropriate open space, trees and utilising Sud's for their aquatic/ecological habitats and bio-diversity.

M&M believe that new standards, as alluded to in point E) require to be proportionate and do not all fall on new development proposals to provide. There requires to be a comprehensive audit of existing open space provision throughout the City and only where distinct deficiencies are identified, a proportionate response should be sought via new development, which recognises the proposed use and its impact on green/blue infrastructure.

### 3.2 CHOICE TWO – IMPROVING QUALITY, DENSITY AND ACCESSIBILITY OF DEVELOPMENT

M&M are committed to any development that they undertake in Edinburgh. Creating a great new place and contributing to existing communities is an important aspect of their work. M&M are proud of their 95 years' experience of home building in Edinburgh and the legacy that this bestows as Scottish housebuilders of a fine reputation and high standards. M&M support a consistent approach to determining applications for new buildings and places, this is considered essential.

Accessibility for their residents is at the forefront of their design/layout process, and is evidenced in a supporting design and access statement with a planning application. The proposed further densification of development to a minimum 65 units per hectare is ambitious and M&M question whether this will allow for the provision of a full tenure range and choice of housing across a development. Perhaps this proposed standard could be applied to urban brownfield sites, with the application of a lesser density range from 50-65 units per Ha for greenfield land



releases, in sustainable locations, which are close to public transport and active travel routes.

M&M will ensure that their development proposals include streets, a road layout and a sense of place which reflects the Street Design Guidance in Edinburgh and meets the SPP six qualities of a successful place, namely;

- Safe
- Pleasant
- Easy to move around
- Welcoming
- Adaptable
- Energy efficient

### 3.3 CHOICE THREE – CARBON NEUTRAL BUILDINGS

M&M recognise that there is a requirement to reduce carbon emissions through good design and the use of low and zero carbon generating technologies. We note the Council's aim for all buildings in Edinburgh to be zero carbon by 2030 and that 50% of the carbon reduction target should be met through low and zero carbon generating technologies. However, M&M believe that emissions standards for new buildings should continue to be regulated under the building standards system and not the planning system, as this would cause needless duplication. The current focus should be to maximise the efficiency of the existing planning resource. Therefore, apart from an overall CEC view of seeking to achieve carbon neutral buildings, this should not result in a bespoke planning policy in the LDP.

### 3.4 CHOICE FOUR – CREATING PLACE BRIEFS AND SUPPORTING COMMUNITY LOCAL PLACE PLANS

The ambition of CEC to have Place Briefs prepared in conjunction with local communities in all new housing sites is a significant increase in consultation requirements, especially for those sites below 2Ha in size and which are not major applications in the planning hierarchy of development. It is considered that Place Briefs are best suited to strategic sites and that education, transport and infrastructure provision is best led by expert advice and evidence. There also

requires to be a leading role for landowners and developers in the preparation of Place Briefs.

The new Planning Act allows for Local Place Plans (LPP) to be prepared by local communities and set proposals for development of land of particular significance to a local area. However, it should also be highlighted that the LPPs require to adhere to the LDP.

### 3.5 CHOICE FIVE – DELIVERING COMMUNITY INFRASTRUCTURE

M&M concur with the CEC view that directing development to where there is existing or under-utilised infrastructure is sensible. If new infrastructure is required, improvements are sought and investment needed, then this requires to be guided by Planning Circular 3/2012 – Planning Obligations and the associated tests, in order for a planning agreement (section 75) to be entered into between a developer and the Council. A developer contribution must be proportionate and directly relevant to the development proposal.

In terms of Healthcare Infrastructure, it is considered that the planning of future health care services is a matter the NHS Lothians to address and not developers. Subsequently, contributions should not be sought.

A M&M development proposal would take full account of its transport impact and this would be detailed as a supporting report for a planning application on an M&M development site. M&M aim to promote landholdings that are located in sustainable locations where there are nearby walking routes of public transport provision.

### 3.6 CHOICE SIX – PEOPLE NOT CARS

This is covered by M&M in the preceding section. M&M fully subscribe to creating places for people and not cars, focusing on healthy lives by prioritising access to public transport, walking and cycling routes, and reducing levels of private car ownership.

### 3.7 CHOICE SEVEN – REDUCE CAR USE

M&M are committed to utilising good public transport options, supporting walking/cycling, providing access to car clubs, shared mobility, which each provide less need to own a car. Determining car parking levels based on the area of the city and development type are also important considerations. M&M consider that this

Choice should be merged with the preceding Choice as there is significant duplication on this subject and a single policy response will be clearer.

### 3.8 CHOICE EIGHT – DELIVERING NEW WALKING/CYCLING ROUTES

The aim to provide new walking and cycling routes is laudable. M&M believe that a review of the entire cycle/footpath network in the city should be undertaken, and where deficiencies or improvements are identified these should be highlighted. Any request for development to contribute to provision of new routes should be proportionate and relevant to the development proposal, as well as meeting all the tests of Circular 3/2012.

### 3.9 CHOICE NINE – PROTECTING AGAINST LOSS OF HOMES

This is a future policy in the forthcoming LDP designed to tackle matters relative to short term lets in the City and is not a matter that M&M wish to comment on.

### 3.10 CHOICE TEN - CREATING SUSTAINABLE COMMUNITIES

M&M support the aim to increase the number of new homes in Edinburgh, with their specific focus on the creation of sustainable communities. However, in terms of the proposed requirement for student accommodation to provide mixed use development, M&M consider that uses require to be compatible. Not all student housing sites can provide a variety of other planning uses and tenure types.

### 3.11 CHOICE ELEVEN – AFFORDABLE HOUSING

Whilst the Council's aspiration to build 20,000 affordable homes is noted and considered commendable, the aim to increase the affordable housing requirement from 25% to 35% requires to be carefully considered. Addressing affordability will require subsidised affordable housing, but this should not be seen as the only policy lever necessary to address the issue. The focus requires to be on providing more housing of all tenures. Edinburgh needs to be building more homes of all tenures, otherwise, pressures on affordability will continue. If new housing supply continues to be inadequate to satisfy housing need and demand it will continue to place upwards pressure on affordability.

Edinburgh has failed to adequately plan to meet the housing need and demand it has itself identified in its own evidence. When housing supply targets were belatedly

produced to support SESplan 1 in November 2014, the 2009-24 target for Edinburgh was just 61% of the figure set out in the Housing Need and Demand Assessment (HNDA, Table 5.1.2). The now abandoned SESPlan 2 only set out to meet 39% of need and demand arising between 2012-30 in Edinburgh.

It is unsurprising, though regrettable that this failure to plan to meet need and demand properly appears to be influencing some of the problems which are identified in the Main Issues Report.

M&M believe that the 25% level of affordable housing should remain for urban brownfield sites, on the basis of viability. They are willing to support a further 10% affordable housing on greenfield sites raising it to the Council's desired 35%, but on the conditional basis this additional 10% is not social provision, but discounted/low cost home ownership affordable housing.

### 3.12 CHOICE TWELVE – BUILDING NEW HOMES AND INFRASTRUCTURE

There is a recognition by the Council that they need to provide new homes in Edinburgh and allocate land for new homes. M&M are of the view that the Council, in accordance with the provisions of the new Planning Act and forthcoming NPF4 require to meet their housing requirement in full.

The last approved South East Scotland (SESPlan) Strategic Development Plan (SDP) is dated from 2013 and does not break down housing requirements by local authority area beyond 2024. The evidence base for this MIR is therefore dated. We do concur that under the circumstances, with SESPlan2 being rejected by Scottish Ministers in 2019, it is reasonable that the Edinburgh target is set using the more updated HNDA 2 (2015).

M&M support the Council's aim to provide over 20,000 affordable homes to 2032.

Choices 2030 sets out two options for a housing target, as follows:

1. Preferred Option: 43,400 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HMDA 2 Wealth Distribution Scenario less completions between 2012 and 2019.
2. Alternative Option: 52,800 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HMDA 2 Wealth Distribution Scenario less completions between 2012 and 2019.

Both options fall some way short of meeting housing need and demand in full. The preferred option would meet just 65% of identified need and demand in the HNDA 2 Wealth Distribution Scenario. The alternative option would meet 79% of identified

need and demand in the HNDA 2 Wealth Distribution Scenario or 65% of the Strong Economic Growth Scenario.

Choices 2030 and the Housing Study do not adequately justify why housing need and demand cannot be met in full. There is a reference to the other factors involved in setting the housing target in SPP (para. 115), but it is not explained in any detail why a downward adjustment from the HNDA output is considered to be justified. This is an important point given the historic severe undersupply of housing and housing land in Edinburgh and merits further significant attention.

The alternative target of 52,800 homes is discounted because it is argued that the supporting evidence to the HNDA suggested the Strong Economic Growth Scenarios was unrealistic. However, this evidence was produced in 2013 (Oxford Economics reference) and applied to the whole SESPlan region. M&M do not consider that these conclusions remain relevant to Edinburgh in 2020 or indeed the next decade to 2030.

Taking these factors into consideration we consider that the higher Housing Supply Target (HST) of 52,800 between 2019-32 is the most appropriate target. This equates to approximately 79% of the middle HNDA output. The Edinburgh housing market has self-containment in moves of between 81% and 90%. 79% is close to the lower threshold, but the unmet need and demand will need to be met elsewhere.

M&M believe that the CEC should review the submissions to the MIR and then seek to ascertain how the land required for the full range of housing provision is met. To outline that land will either be provided by the Council and its partners or through an alternative and unsupported 'market housing led' is a dogmatic approach that does not reflect the collaboration needed, to ensure all housing tenure provision is provided for in full, in Edinburgh, over the next decade. As the nation's capital and an economic powerhouse for the Scottish economy, greater ambition is required by CEC to house its citizens and rising population, obfuscation and dereliction of responsibility are no longer acceptable.

To deliver new homes in the most sustainable manner, CEC have expressed a preferred option of these being delivered by the Council and its partners within the urban area, a brownfield sites approach. M&M recognise the importance of reusing previously developed land as a key objective of the planning system and have undertaken many developments of this nature themselves. However, when the Council then outline that to meet their preferred housing requirement they require 275 Ha of urban land and that only 11 Ha is currently available for development and the remainder is currently in use as employment land, then the credibility and deliverability of their preferred strategy requires to be significantly questioned. This

is a route that, if followed, will ensure that there is another decade of under provision of housing within Edinburgh. This is unacceptable.

M&M believe that a balanced approach is required with a combination of brownfield and greenfield sites coming forward over the next decade to maximise the prospects of Edinburgh delivering the full range of homes it needs for its residents.

To meet the 52,800 (+ 10% generosity margin = approximately 58,000) unit requirement favoured by M&M, this equates to 4,060 units per annum. With a current land supply of just over 30,000 units, historic brownfield completions of 850 per annum, this equates to a further 11,000 homes to 2032, requiring approximately 17,000 homes to be allocated through the release of greenfield land in Edinburgh.

M&M believe that this will require deliverable sites from all tenure options to ensure that the housing requirements of the city are met in full. M&M have a short term, under five years, deliverable site in Liberton for approximately 100 units. A short term greenfield land release site of this nature will provide Edinburgh with the housing it requires and maximise its prospects of meeting it's housing demand. The site specific details of this landholding will be covered in further sections of this submission.

### 3.13 CHOICE THIRTEEN – INNOVATION, UNIVERSITIES AND CULTURE

A policy provision in the LDP that supports social enterprises, start up's, culture, tourism, innovation, learning and a low carbon sector are supported by M&M, as these enrich the City.

### 3.14 CHOICE FOURTEEN – DELIVERING WEST EDINBURGH

It is recognised that the area in and around Edinburgh Airport is identified as nationally significant in economic and transport terms, there are strategic land allocations from the current LDP 2016 for growth in this area. There are proposals to build on these allocations through this next LDP and M&M believe that a balance is required between the west and south east of the city.

### 3.15 CHOICE FIFTEEN – PROTECTING CITY, TOWN AND LOCAL CENTRES

Edinburgh fortunately benefits from a healthy range of local, town and thriving city centre. M&M support the policy option to seek to strengthen local and town centres, as these are often in sustainable locations with good transport connections that

provide a range of goods, services and community facilities. It is considered important that they maintain their vitality, viability and deliver good placemaking.

### 3.16 CHOICE SIXTEEN – DELIVERING OFFICE, BUSINESS AND INDUSTRIAL FLOORSPACE

M&M have no comments to offer in this section.

## 4 LAND AT ALNWICKHILL ROAD, LIBERTON

### 4.1 BACKGROUND

The preceding sections set out Mactaggart & Mickel's views on the scale of housing and the balanced strategy required to ensure that Edinburgh meets its housing requirement in full over the next decade.

Mactaggart and Mickel control a parcel of land adjacent to Alnwickhill Road at Liberton, which they consider to be deliverable in the shortterm and is appropriate for allocation for residential development in the next Local Development Plan.

The site is available now for the provision of a landscape-led and locally appropriate residential development, comprising a moderate number of new homes (100 units) within the city boundary of Edinburgh.

The site at Alnwickhill Road is situated within South East Edinburgh, approximately 2.5 miles south of Edinburgh City Centre and 3 miles north of the City Bypass(A720).

The site sits adjacent to the residential area of Liberton, with Blackford Hill and the Braid Hills lying further west. To the immediate east of the site beyond Alnwickhill Road lies the new residential development of Liberton Grange, on the site of the former Scottish Water landholding.

It is bounded to the east by Alnwickhill Road and is bounded by Tower Farm Riding Stables and Braid Hills Golf Course to the west. To the north lies the well contained, Category 'A' listed building of special architectural or historic interest, Liberton House, set within wooded grounds. The site is bounded to the south by Stanedykehead. The site is well served by nearby Cameron Toll Shopping Centre and has regular bus services to the city centre located nearby.

The site's position within the existing city boundary and its moderate size allows for a short term 2-3 year deliverable residential site.

### 4.2 SITE PROMOTION HISTORY

Mactaggart and Mickel historically promoted their entire Liberton Brae landholdings for development through the last LDP review in 2014/15, as part of a wider concept comprising the development of multiple landholdings in their control around Liberton.



This strategy has been reviewed and the smaller extent of their landholdings that Mactaggart and Mickel now wish to promote for development has been revised following initial engagement with the local Community Council and local politicians regarding development around the Liberton area.

### 4.3 PROSPECTIVE SITE CONTEXT

Mactaggart and Mickel control the site adjacent to Alnwickhill Road which extends to approximately 7ha.

The site comprises arable farmland and sits within the statutory Green Belt and a Special Landscape Area of Braids, Liberton and Mortonhall in the adopted LDP.

Mactaggart and Mickel propose to develop 2.98ha of this land, which constitutes 35.6% of the total site area.

The remaining 5.44ha of the site has potential to provide an enhanced area of open space through a series of measures, including structural planting and additional pathways which connect into the existing core path network.

Therefore, notwithstanding the fact that the site is included within the South East Edinburgh Strategic Development Area, we are not proposing a strategic scale of development.

Mactaggart and Mickel engaged the services of Landscape Architects, Brindley Associates, to undertake a comprehensive appraisal of the site and develop an initial conceptual framework, which can be found on page 20 of the accompanying promotional document.

The proposed concept seeks to address the conclusions drawn in Edinburgh Council's Housing Land Assessment for 'South of Liberton Drive' through a landscape-led approach which sufficiently mitigates any landscape and visual impacts on the Strategic Landscape Area through wider improvements to the green belt edge. The package of mitigation proposals is outlined in chapter 7 (page 19) of the accompanying promotional document by Brindley Associates.

The proposal is based on the allocation of a relatively small area of land on the existing urban edge of Edinburgh, which extends the built up area in an appropriate manner.

## 4.4 SITE ANALYSIS

The site forms the eastern most part of the wider area known as 'South of Liberton Drive', as assessed by CEC in their Housing Land Study.

The Greenfield Site Assessment (Part 2b) concluded that the wider area 'South of Liberton Drive' is unsuitable for development principally for the following reasons:

- Poor community infrastructure capacity
- Prominent landscape character
- Contribution to the Strategic Green Network

Furthermore, under the specific assessment criteria detailed below, the site scored poorly in terms of;

- access to the wider cycle network
- active travel opportunities
- access to public transport
- school capacity
- impacts on surrounding landscape character.
- impacts upon the green network.

### Assessment Matrix

#### Sector 2 - South East SDA

AREA NAME	SDP1 Strategic Development Areas	10 min walk to local convenience services	30 min walk to employment clusters	Access to wider cycle network	Active travel assessment (overall)	Access to existing public transport	Public transport assessment (overall)	Primary school capacity	Secondary school capacity	Community infrastructure assessment (overall)	Landscape character assessment	Green network assessment	Flood risk assessment	SUMMARY
West of Liberton Drive														
South of Liberton Drive														
South of Triggston Road Linn														
South of Lang Loan														
South of Gilmerton Station Road														
South East Wedge Parkland														
Liberton Golf Course														
Craigmillar Castle Park														
Drum South														
Drum North														
Mortonhall Cemetery and Crematorium														
East of Burdiehouse Road														

Each of the Greenfield Sites assessment criteria for which the site scored red and amber will be addressed in turn.

#### 4.4.1 ACTIVE TRAVEL

ACTIVE TRAVEL	
<i>Does the site support travel by foot to identified convenience services?</i>	<b>Yes</b> – The site is within walking distance of local convenience services.
<i>Does the site support travel by foot to identified employment clusters?</i>	<b>Yes</b> – The site is within walking distance of employment clusters.
<i>Does the site have access to the wider cycle network?</i>	<b>No</b> – 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.
<i>Can the site support active travel overall through appropriate intervention?</i>	<b>No</b> – The site would not support active travel overall, as access to the wider cycle network is poor and it is unlikely to be improved through an identified intervention.

The key issue identified in the assessment was the site’s access to the wider cycle network. As part of the proposed Quiet Route network within the Council’s Active Travel Action Plan (ATAP) (2016), the accompanying promotional document demonstrates that there would be a Quiet Route to the west of the site which follows the eastern edge of Braid Hills and Mortonhall Golf Courses (see graphic on page9 of the Brindley Associates report). This would in turn provide further cycle connections across Edinburgh.

Additionally, given the site’s city location, the surrounding road network generally provides access to cycle lanes which provide safe access to the wider area.

The core path network is immediately accessible from the site’s southern and eastern boundaries, providing wider links to the surrounding area, including the extensive core path network at Braid Hills.

As part of the development proposals outlined for the site, Mactaggart and Mickel would seek to promote and retain footpath and potential cyclist connections through the site, linking directly with Core Path CEC2 - The Braids and with the wider road and footpath network. Provision would be secured through the Section 75 legal agreement between the Council and developer. This approach essentially serves to futureproof the development by the provision of pathways which have potential for upgrade to cycleways.

Consequently, we consider that as a result of these identified interventions on this particular site, through a well-considered development framework, the current score for active travel, in terms of the access to the wider cycle network and supporting active travel as a whole, can both be amended to at least an amber.

4.4.2 PUBLIC TRANSPORT

The score for access to public transport for the wider assessment area ‘South of Liberton Drive’ is presently at an acceptable level.

PUBLIC TRANSPORT	
<i>Does the site support travel by public transport through existing public transport network accessibility and capacity?</i>	<b>Partially</b> – The site has limited support for travel by public transport based on existing or incrementally improved provision.
<i>Is the site potentially served by an identified public transport intervention project which is deliverable in the plan period to serve and accommodate development?</i>	<b>Partially</b> – The site has limited support for travel by public transport without major intervention deliverable within the plan period.

Brindley Associates developed a walking isochrone plan on page 9, section 5.2 of the accompanying report, which demonstrates that the entire site is within a 400m walking distance of 4 bus stops, which equates to an average of 5-10 minutes walking time. An additional 15 bus stops are within an 800m walk of the site.

The isochrone plan demonstrates that the site is very well connected via a number of bus service providers and routes. There are direct links with Edinburgh city centre and subsequently further travel links via train or tram.

The site accords with the recommended ‘walkable neighbourhood’ guidelines outlined within the Designing Streets publication (Scottish Government, 2010) and we consider that the score for the extent to which the site supports travel by public transport, in terms of access and capacity, should be green to acknowledge the high level of connectivity that the site demonstrably benefits from.

Given the array of public bus services that are available within the vicinity of the site, we do not consider that an identified public transport intervention project is required in this instance to support the moderate level of housing proposed in this location. Subsequently, we consider that the score for this criteria should be green.

### 4.4.3 COMMUNITY INFRASTRUCTURE

The site scored poorly against the criteria for primary and secondary school provision below.

COMMUNITY INFRASTRUCTURE	
<i>Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?</i>	<b>No</b> – The site does not have sufficient primary school infrastructure capacity.
<i>Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?</i>	<b>No</b> – The site does not have sufficient secondary school infrastructure capacity.

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City Plan 2030, Housing Study Part 2b, January 2020

<i>If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?</i>	<b>No</b> – The site does not have sufficient community infrastructure capacity to support development and no appropriate intervention has been identified to address this. A new primary school would be required. A new secondary school would be required. The Council's preference is to deliver new secondary schools with a capacity for 1200 pupils but this would require significant new housing development in the area to generate this number of pupils. A new secondary school would have to serve a wide catchment area so good active travel and transport links would be important. There is not enough scope for development on this and nearby sites to support this level of intervention.
--	---

The Council are required to identify a housing strategy to deliver the housing need over the Plan period. Accordingly, the Council should be reviewing their education infrastructure in tandem and we therefore consider that the current reasoning for the red score is unjustified. We disagree with the Council's view that the site cannot be developed due to a lack of capacity at existing primary and secondary schools. Proportionate developer contributions for education infrastructure would be secured through a Section 75 legal agreement upon grant of planning permission to ensure that the educational needs of future residents are sufficiently addressed.

Moreover, page 10 of the accompanying report identifies the numerous facilities within the local area that are within easy walking distance of the site as follows:

- Liberton Public Park (approximately 80m northeast of site);
- Braid Hills BUPA Care Home (approximately 110m north of site);
- Tower Farm Riding Stables (approximately 115m northwest of site);
- Seven Acre Play Park (approximately 150m southwest of site);
- Liberton Medical Practice (approximately 380m east of site);

- Liberton Gardens Sub Post-Office (approximately 400m northeast of site);
- Mortonhall Caravan and Camping Park (approximately 550m south of site);
- Liberton Golf Club (approximately 1.6km northeast of site);
- Braid Hills Golf Club (approximately 1.9km west of site); and
- Numerous local shops and eateries within easy walking distance.

The site is therefore demonstrably well served by a variety of shops, services and community infrastructure amenities and we consider that the scoring for infrastructure capacity should be at least amber.

#### 4.4.4 LANDSCAPE CHARACTER

Due to the site’s location within the Green Belt and the Special Landscape Area, Brindley Associates were engaged to prepare a Landscape and Visual Appraisal, see section 6.3, page 13 of the accompanying report.

The LVA aims to address the Council’s conclusions from the assessment noted below;

LANDSCAPE CHARACTER	
<i>Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?</i>	<b>No</b> – No scope is identified for development on this site due to its visual prominence and importance for the setting of the Braid Hills and the city.

The site at Alnwickhill Road is contained in character, by virtue of the topography and boundary planting. The area is less prominent from Blackford Hill than the area to the West of Liberton Brae, with the main views into the site from Liberton Drive (adjacent to the riding school) and along Liberton Drive as it continues, as a track, along the eastern boundary of Braidhills and Mortonhall Golf Courses.

While the majority of the character of the surrounding area is typical of arable farmland, the golf driving range, riding school, kennels and former WW2 anti-aircraft battery create a more fragmented landscape.

The landscape structure is that of fragmented field boundaries and tree groups. Planted boundaries associated with the golf driving range consist of mature Leylandii, creating incongruous hard lines in comparison with the more usual field boundary planting within the area.

Recreation opportunities are generally focussed around golf and riding with some footpath access through the arable farmland, and along Liberton Drive and Stanedykehead.

### Edinburgh Green Belt Study

The 'Edinburgh Green Belt: Landscape Character Assessment' carried out by LUC in 2008 was taken forward as the Edinburgh LCA (2010). The LCA considered the site adjacent to Alnwickhill Road under the wider assessment area identified as 'Liberton Fringes' (LCA 54).

This three stage evaluation process defined and assessed Landscape Character Areas, identifying those that were not fulfilling the Green Belt objectives for a more detailed evaluation of their landscape capacity.

This selection process was carried out through a scoring system for both 'Character' and 'Open Space'. If both scores were below 67%, the Landscape Character Area was selected for the more detailed stage of evaluation.

While 'Liberton Fringes' was not selected for more detailed evaluation it achieved a low 'Character' score of 62% with 'Open Space' being scored as 83%.

The following is a summary of findings from the LUC Character Assessment:

- The integrity of the farmland landscape character is diminished by dispersed built development, including the gun battery position, riding stables, kennels and driving range.
- While the farmland appears to be well managed, field boundaries are not maintained.
- The simplification of boundaries (for example, the removal of Leylandii hedging) and improvements to infrastructure and buildings could help enhance the landscape condition.
- In terms of robustness and sustainability of existing boundaries in landscape terms, the assessment suggested the housing the eastern fringes were more exposed and fragmented than the policy woodland and steeper slopes associated with Mortonhall and the Braid Hills.
- Public access to accessible open space is to some extent restricted by the golf driving range, kennels and other minor development.

'Liberton Fringes' is identified as a Landscape Character Area that is not of intrinsic scenic quality, but its association with the Braid Hills increases its value. Enhancements to boundaries, infrastructure and buildings are suggested, and the exposed, fragmented eastern fringes score low in the assessment.

Through the introduction of a non-strategic scale of development at the Alnwickhill site, associated with the eastern edge, there is the possibility to address these points and improve the integrity of the LCA in part.

The 'Edinburgh Greenbelt Study' suggests the wider assessment area is of value in terms of the landscape setting of the city due to its association with the Braid Hills. The careful placement of development within a new Green Belt edge associated with existing residential development to the east of the assessment area minimises impact on the most visually prominent areas, and preserves the relationship with the Braid Hills. Careful consideration of a new Green Belt edge, particularly in terms of planting, could help to set existing and proposed development more sensitively when considered as part of the wider city setting.

#### **LVA**

Brindley Associates' LVA (section 6.3, page 13) in the accompanying report identifies the landscape and visual constraints and opportunities of the site which has informed the landscape development framework in section 7.

A series of Zone of Theoretical Visibility (ZTV) drawings were produced to identify areas within the site which would result in reduced theoretical visibility. A final ZTV was run from a central location within the proposed developable area (page 14 of the Brindley report), thereby providing a theoretical visibility overview of the site.

In addition to the modified ZTV produced to reflect potential visual effects of any future development on the promoted site, a ZTV was also produced from the adjacent recent development at Liberton Grange. This provided a direct comparison between the existing visibility of Liberton Grange and the Alnwickhill Road site.

The resulting modified ZTV shows a very similar visibility pattern to that of the promoted site.

The main areas of visibility follow a very similar pattern - extending west towards Braid Hills and southwest towards Mortonhall. Visibility also extends northwest to the Royal Observatory.

This visibility mapping exercise demonstrates that any development within the Alnwickhill Road site will generally only be visible from areas which currently have visibility of the recent residential development at Liberton Grange. It can therefore



be assumed that the inclusion of any future built form within the promoted site would not incur a significantly different level of visibility than that already experienced.

Given the relatively small footprint of the site in relation to the SLA, which equates to 1.4% - (less when considering the potential development footprint at 0.5%); the overall impact on the 574ha SLA would be minimal.

Following the mitigation proposals outlined within the design response (see Section 7.0) and subsequently illustrated in the Landscape Development Framework, the extensive structural woodland proposed within the west of the site will screen both the promoted site and the existing development at Liberton Grange in views from the west. The development of the land adjacent to Alnwickhill Road therefore presents the opportunity for betterment of the existing view.

The proposed concept could also strengthen the eastern Green Belt edge through the careful location of development associated with the existing residential development.

This approach allows the establishment of a new Green Belt edge, with improved access to open space, and enhanced woodland planting creating a zone of amenity that encourages access into, and active use of the wider Green Belt. Strong groups of planting along this edge could form a distinct yet visually permeable boundary in keeping with the incomplete field boundaries and tree groups.

### **Ecology**

The Landscape Development Framework provides a level of landscape and visual mitigation of the site within the 2km study area and has been designed to provide additional biodiversity value to the existing baseline conditions. Biodiversity will be supported on site through the use of green infrastructure and green networks. One of the primary proposed measures include the planting of native tree species to create a habitat corridor and wider linkages to the woodland areas north and south of the site.

A Preliminary Ecological Appraisal (PEA) was undertaken by Brindley Associates (section 6.1, page 11). There were no major issues identified on the site. We are however aware of potential bat and bird risk at the site edges and if the site is taken forward for development, the appropriate additional surveys and implementation of required mitigation measures will be undertaken. Trees with potential for roosting bats are sought to be retained as part of any development that comes forward.

### Arboriculture

An arboricultural impact assessment was also carried out (section 6.2, page 12) which confirmed that there are a number of trees on or adjacent to the site of varying quality.

Trees which are in good condition and have particular value will be retained. The woodland and specimens in the north west corner outwith the site boundary will be treated accordingly with adequate exclusion zones.

Trees in poor condition which offer no visual impact benefits, and which are affected by disease will be removed.

Retention of the better quality trees will be a priority, and they will be enhanced by new and replacement planting where appropriate.

### Conclusions

There is the potential through M&M’s landholding at Alnwickhill Road to create a green corridor around a new urban edge, which delivers environmental and recreational benefits for local residents of Liberton. A holistic vision for the site will help to define a long term Green Belt boundary that is better defined and which offers a range of enhancements to this part of the City.

Consequently, we consider that the site’s score in terms of landscape character should be at least amber in colour, as a result of the comprehensive studies for these proposals which demonstrate that it can be brought forward with minimal attributable effects on the existing landscape, biodiversity and visual resource, both within the site boundary and the surrounding area.

#### 4.4.5 GREEN NETWORK

The wider assessment area ‘South of Liberton Drive’ was considered to be of value to the strategic green network as below.

GREEN NETWORK	
<i>Would development of the site avoid significant loss of landscape-scale land identified as being of existing or potential value for the strategic green network?</i>	<b>No</b> – The site is of value for the strategic green network, due to lying within an area identified as a green network opportunity in Edinburgh itself. The site is currently partly used as open space and contributes to the unbroken landscape scale multi-functional green network stretching from Midlothian to Blackford Hill.

The site at Alnwickhill Road is currently arable land which is used informally as open space by local residents.

As outlined in the landscape development framework, localised enhancements are proposed to footpath/bridleway connections which could contribute to the Green

Network, linking existing recreational open space and play provision through the site via existing core paths that border the southern and eastern boundaries of the site.

Moreover, as prior mentioned, the proposals are non-strategic in nature and of the 8.42ha site, only 2.98 is proposed to be developed (35.6% of the total site area), whilst the remainder of the site will provide formalised open space for existing and future residents at Liberton to enjoy, which will provide linkages to the existing core paths and wider footpath network.

Subsequently we consider that the development of our client's site through a well considered landscape led approach can enhance the green network through further open space provision which is well connected to the existing path network.

We consider that the site specific scoring should therefore be green in this instance.

#### 4.4.6 SITE ANALYSIS CONCLUSIONS

Through this landscape led approach, this particular site represents an opportunity to make efficient use of land for the benefit of multiple stakeholders and should be considered a unique opportunity to provide additional housing in a well served and connected area in the city boundary of Edinburgh whilst respecting important views and enhancing access to the greenbelt and beyond for recreational purposes.

Our site specific scoring can be concluded as follows:

Assessment Criteria	Land at Alnwickhill Road
SDP1 Strategic Development Areas	Yellow
10 minute walk to local convenience services	Green
30 minute walk to employment clusters	Green
Access to wider cycle network	Yellow
Access to existing public transport	Green
Public transport assessment overall	Green
Primary School capacity	Yellow
Secondary School capacity	Yellow
Community Infrastructure Assessment overall	Yellow
Landscape character assessment	Yellow

<b>Green Network Assessment</b>	
<b>Flood Risk Assessment</b>	
<b>Summary</b>	

The site scores well against the assessment criteria and is therefore a suitable future housing allocation in the LDP. This is more so when one considers the possibility that significantly more land requires to be allocated for housing in the LDP.

Mactaggart & Mickel request that their site at Alnwickhill Road is allocated as a short term deliverable residential site in the new CEC LDP.



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# Land at Alnwickhill Road, Liberton

Strategic Promotional Document

March 2020



creative • environmental



For Mactaggart and Mickel Homes Ltd



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Design Team:



Applicant:



above: View across the site at southern boundary



above: View across the site at northern boundary





# 1.0 BACKGROUND

## 1.1 Introduction

This document is lodged on behalf of Mactaggart & Mickel and supports their representations to the City of Edinburgh Council (CEC) 'Choices for City Plan 2030 - Main Issues Report'. It requires to be read in conjunction with the representations lodged by Colliers International. Mactaggart & Mickel believe that part of their substantive landholding at Liberton is suitable for short-term delivery of residential development (including affordable) and that their site should be allocated in the forthcoming CEC Local Development Plan as a suitable greenfield housing release site. It demonstrates how the site could be developed in a way which responds positively to its local context based on the evidence gathered through studies relative to landscape and visual impact, ecology and arboricultural impact.

The document provides an appraisal of the site and its surroundings, followed by an overview of key considerations that have shaped design principles for the proposed site. The concept of place-making and creating successful places has been at the heart of the proposals for Alnwickhill Road.

## 1.2 Document Objectives

The Scottish Government has made it clear in National Planning Framework 3 (NPF), Scottish Planning Policy (SPP) and through recent Ministerial decisions that the delivery of housing is a national priority.

This document has been prepared in order to provide tangible evidence as to the suitability of the site for a considered and sustainable development over a five-year period which would provide much needed homes within a well connected area of the city.

The CEC have indicated in the Choices for City Plan 2030 that additional and new allocations are required for residential development. The Colliers International representation details Mactaggart & Mickel's views on the scale of housing required and the planning strategy that should be followed. Their preference is a balanced strategy of both brownfield and greenfield development, to ensure that Edinburgh meets its housing requirement in full over the next decade. CEC undertook a Housing Study to support the Choices for City Plan 2030 and in the greenfield release section of this document our client's Liberton site was assessed, as 'Land south of Liberton Drive'.

The assessment concluded that land within the site was unsuitable for future greenfield land release.

The following sections of this document demonstrate how the site at Alnwickhill Road can aid in the delivery of new housing and also how it can address the concerns of CEC identified within their Greenfield Site Assessment document.

above: View towards Arthur's Seat from within site

opposite: Views to north and south from within site



# 2.0 SITE DETAILS

## 2.1 Site Location and Description

The site is located at the western settlement edge of Liberton towards the southern outskirts of Edinburgh City.

The site, which comprises agricultural land extending to approximately 8.4 hectares (ha) is bounded by a well maintained high stone wall to the eastern site boundary with Alnwickhill Road. The remains of a similar poorly maintained wall are present upon the southern and western site boundaries with timber post-and-wire fencing defining the remaining boundaries. The northern boundary is additionally supported by a well-established deciduous shelter belt comprising mainly native and naturalised sycamore, beech, and birch species. Within this belt of trees there is an informal route running east to west most likely linked with the Core Path routes and the nearby Tower Farm Riding Stables. The site also contains a low number of remnant hedgerow trees along the south and south-western boundary which suggest a former hedgerow.

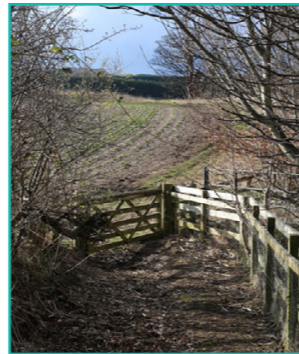
Residencies in close proximity of the site boundary include: Alnwickhill House on the south-eastern corner beyond Stanedykehead (private road), Liberton House approximately 65m north adjacent to the Braid Hills Care Home, Liberton Kennels, approximately 150m to the west of the site's western boundary beyond Liberton Battery Scheduled Monument (SM), and the recent residential development of Liberton Grange to the east of Alnwickhill Road.

## 2.2 Site History

Historically the site has been utilised for agricultural purposes, and continues to be used for these purposes at present.

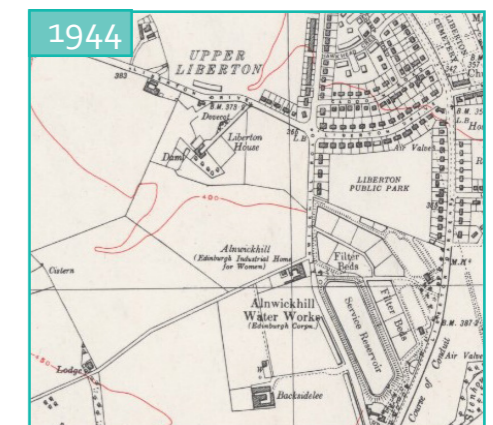
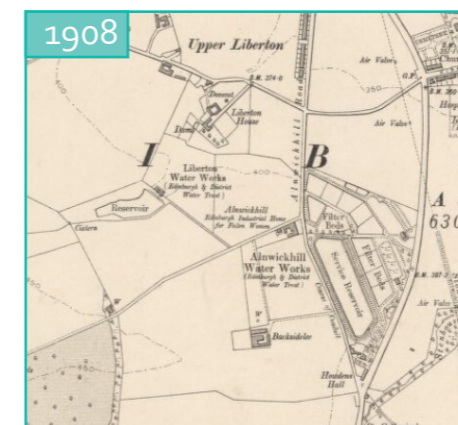
## 2.3 Site Ownership

Mactaggart & Mickel have legal control of substantive landholdings in Liberton extending to 21ha. This landholding lies within their landholdings in this area of the City.



above: Existing footpath at northern site boundary

opposite: Site Location Plan/ historic mapping



# 3.0 PLANNING CONTEXT

## 3.1 Legislation, Policy and Guidance

The representation lodged by Colliers International gives a precise overview of the pertinent site specific planning considerations for the Mactaggart & Mickel landholding. The commentary below relates to the planning context from a landscape architecture, landscape and visual and master-planning perspective.

### 3.1.1 Braids, Liberton and Mortonhall SLA

The Braids, Liberton and Mortonhall SLA is located between south central Edinburgh and the A720 City Bypass, east of Comiston Road and to the west of Liberton Road. The designation covers approximately 574 ha, with the rugged landform, semi-natural vegetation, wooded valleys and relatively intact parkland combining to produce its "high scenic quality" and "contrast with the surrounding built environment."

The Edinburgh LDP (CEC, 2016) describes SLAs as being "designated to protect locally important landscapes from development which would harm their character and appearance." (Part 1: Section 2 para. 38).

Policy Env 11 within the current Edinburgh LDP relates to SLAs and states that: "Planning permission will not be granted for development which would have a significant adverse impact on the special character or qualities of...Special Landscape Areas". Each SLA has a corresponding Statement of Importance which sets out its essential characteristics and qualities as well as its potential for enhancement.

### 3.1.2 Green Belt

Mactaggart & Mickel believe that a review of the green belt is required to facilitate a balanced strategy of brownfield and greenfield housing release. This requires to be undertaken for the LDP.

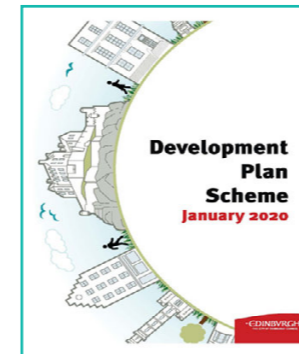
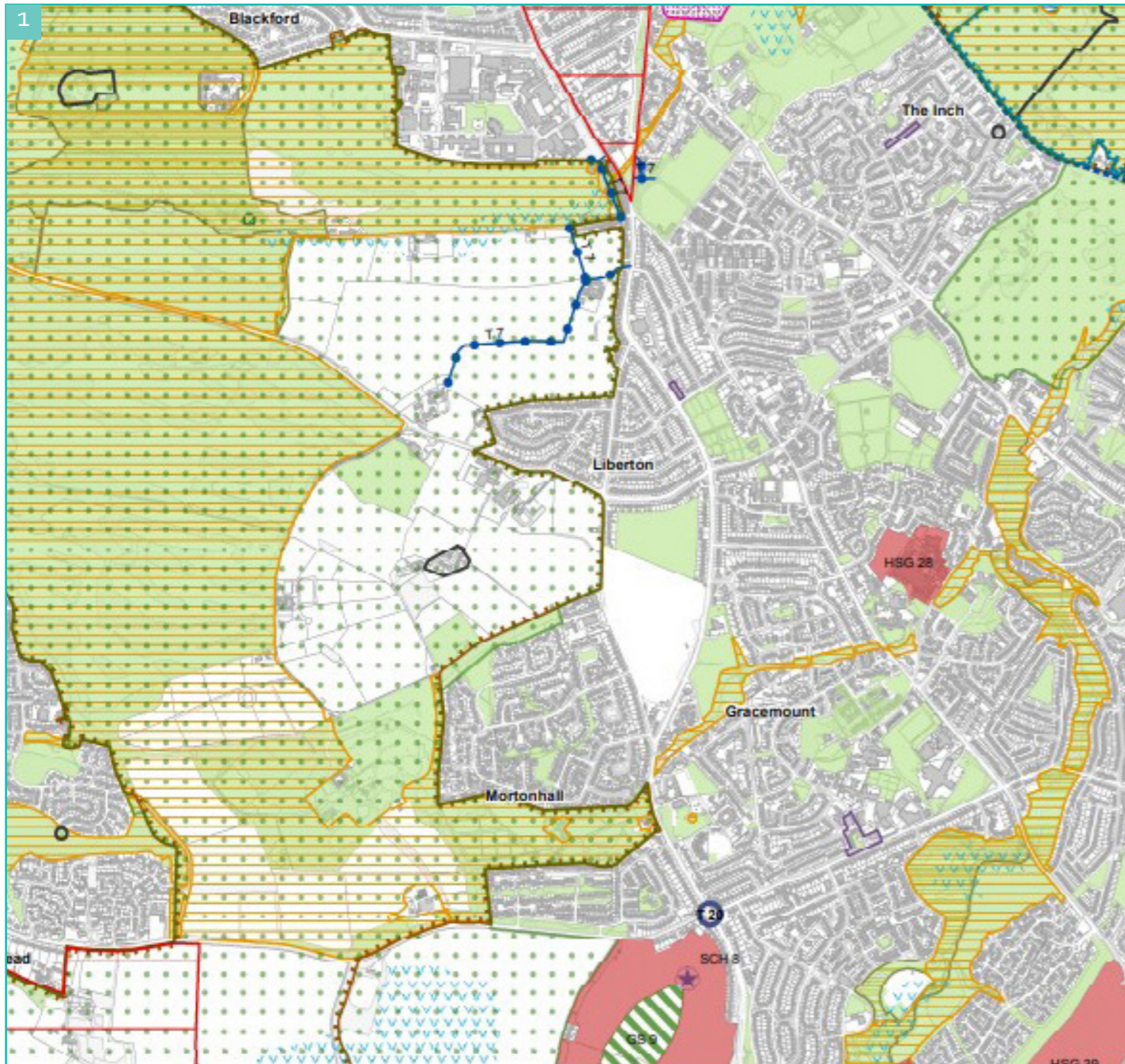
Policy Env 10 Development in the Green Belt and Countryside within the Edinburgh LDP (CEC, 2016) states that: "development will only be permitted where it... would not detract from the landscape quality and/or rural character of the area."

In addition, Policy Des 9 Urban Edge Development within the Edinburgh LDP (CEC, 2016) states that: "Planning permission will only be granted on sites at the Green Belt boundary where it:

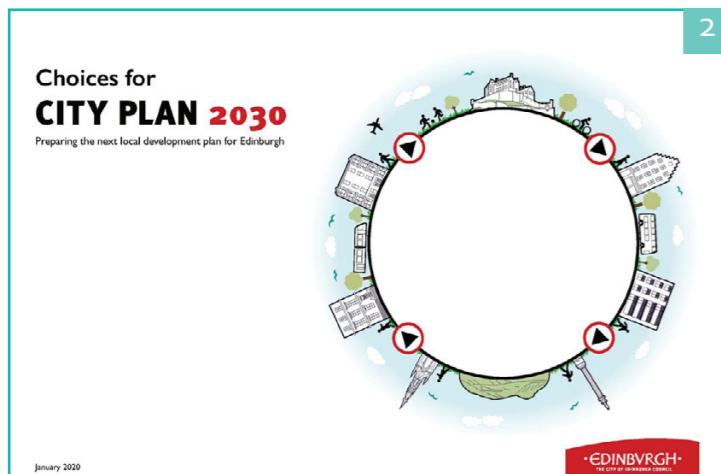
- Conserves and enhances the landscape setting and special character of the city;
- Promotes access to the surrounding countryside if appropriate; and
- Includes landscape improvement proposals that will strengthen the Green Belt boundary and contribute to multi-functional green networks by improving amenity and enhance biodiversity."

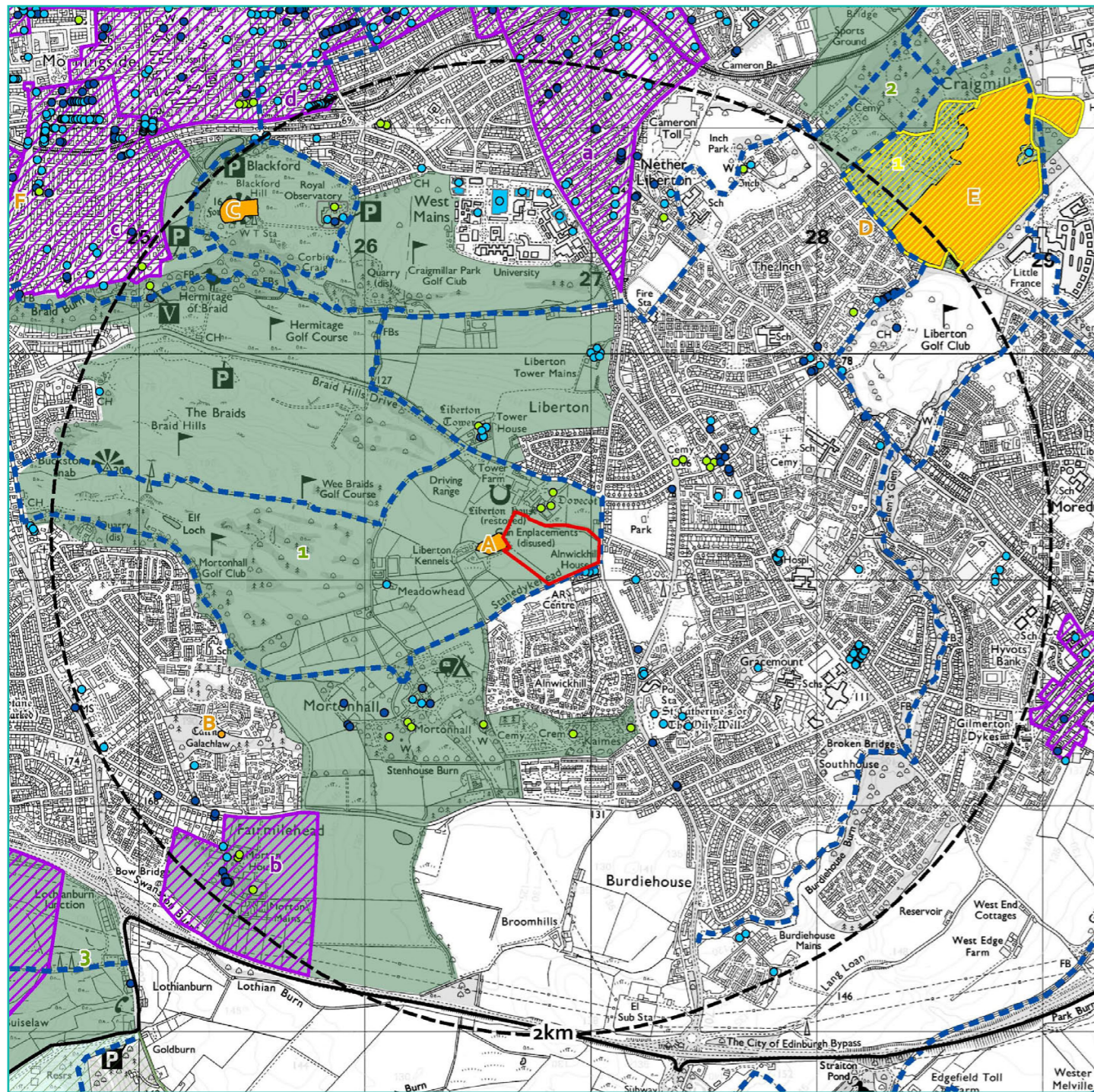
The Edinburgh Green Belt LCA (2008) was taken forward as the Edinburgh LCA (2010), and essentially represents a refinement and finalisation of the document. Both LCAs place the site within Landscape Character Area 54: Liberton Fringes, and provide a score regarding a number of criteria, including:

- Protection and enhancement of the character, landscape setting and identity of towns and cities; and
- Protection and enhancement of open space within and around towns and cities.



- above: CEC Development Plan Scheme 2020
- opposite:
- 1 Excerpt from CEC Proposals Map (Edinburgh South East)
  - 2 CEC City Plan 2030
  - 3 CEC Current Local Development Plan





**Legend**

- Site boundary
- Study area (2km offset from site boundary)
- Council boundaries
- Listed Buildings**
- Category A
- Category B
- Category C
- Designated Routes**
- Core path

**Landscape Designations**

- Edinburgh City Special Landscape Area
- Midlothian Special Landscape Area - Pentland Hills
- Country Park - Hillend

**Cultural Heritage Designations**

- Scheduled Monuments
- Gardens and Designed Landscapes
- Conservation Areas



above: Remains of Liberton Battery Scheduled Monument

opposite: Designations map

# 4.0 REGIONAL SETTING

## 4.1 Wider Landscape Setting

Land to the north of the site, beyond an established deciduous tree belt, comprises unmanaged grassland which in turn lies adjacent to the Braid Hills Care Home to the west. Along the site's south-western edge lies a plot of arable land of similar character to the site, with the medium-sized open space Seven Acre Park beyond. Land adjoining the site's western edge has been given over to the nearby Tower Farm Riding Stables as informal paddock, including land occupied by the SM of Liberton Battery; the remains of an anti-aircraft battery built during the Second World War. To the east the site is bounded by the main route of Alnwickhill Road which connects with Liberton Brae to the north and south.

Beyond the extents of the Riding Stables lies a driving range and the Braid Hills Golf Course, an extensive area of recreational ground which includes public space to the west on the higher ground around Buckstone Snab (206m AOD), offering panoramic views of the surrounding area and beyond. These recreational receptors are also wholly located within both the Edinburgh Green Belt and Braids, Liberton and Mortonhall SLA designations.

To the east of the study area there is extensive urbanisation associated with the City of Edinburgh. To the immediate east of the site beyond Alnwickhill Road lies the new residential development of Liberton Grange. The southern extents of the study area include the route of the A720 City Bypass, and policy planting at Mortonhall Crematorium.

## 4.2 Landscape Designations and Recreational Routes

The site lies within the Edinburgh Green Belt and the Braids, Liberton and Mortonhall Special Landscape Area 21 (SLA) as designated by Edinburgh City Council (Review of Local Landscape Designations, LUC 2010).

To the north-eastern extents of the study area the Gardens and Designed Landscape of Craigmiller Castle lie within the Craigmiller Castle SLA (18).

In addition, there are a number of Listed Buildings within the 2km study area, with Liberton House and Alnwickhill House in close proximity to the site boundary; north and south respectively.

There are also five Scheduled Monuments (SMs) within the study area, the closest of which is Liberton Battery adjacent to the south west corner of the site.

Core Path CEC2 – The Braids, identified within the Edinburgh Core Paths Plan (CEC, 2008) covers various long-distance footpaths throughout the study area, including Stanedykehead immediately south of the site and a short section of Alnwickhill Road along the site's eastern boundary.

### 4.3 Landscape Character

According to the Lothians Landscape Character Assessment (LCA {SNH, 1998}) the site lies within the Landscape Character Type (LCT) sub-type Lowland Hills and Ridges. This study was followed by the Edinburgh Green Belt LCA (LUC in association with Carol Anderson, 2008), which was then taken forward as the Edinburgh LCA (LUC in association with Carol Anderson, 2010), both of which identified the site as being within the Settled Farmland LCT. Given that the Edinburgh LCA is the most detailed assessment to be completed, it is considered that any assessment relating to the site will be considered with reference to the Edinburgh LCA (LUC, 2010).

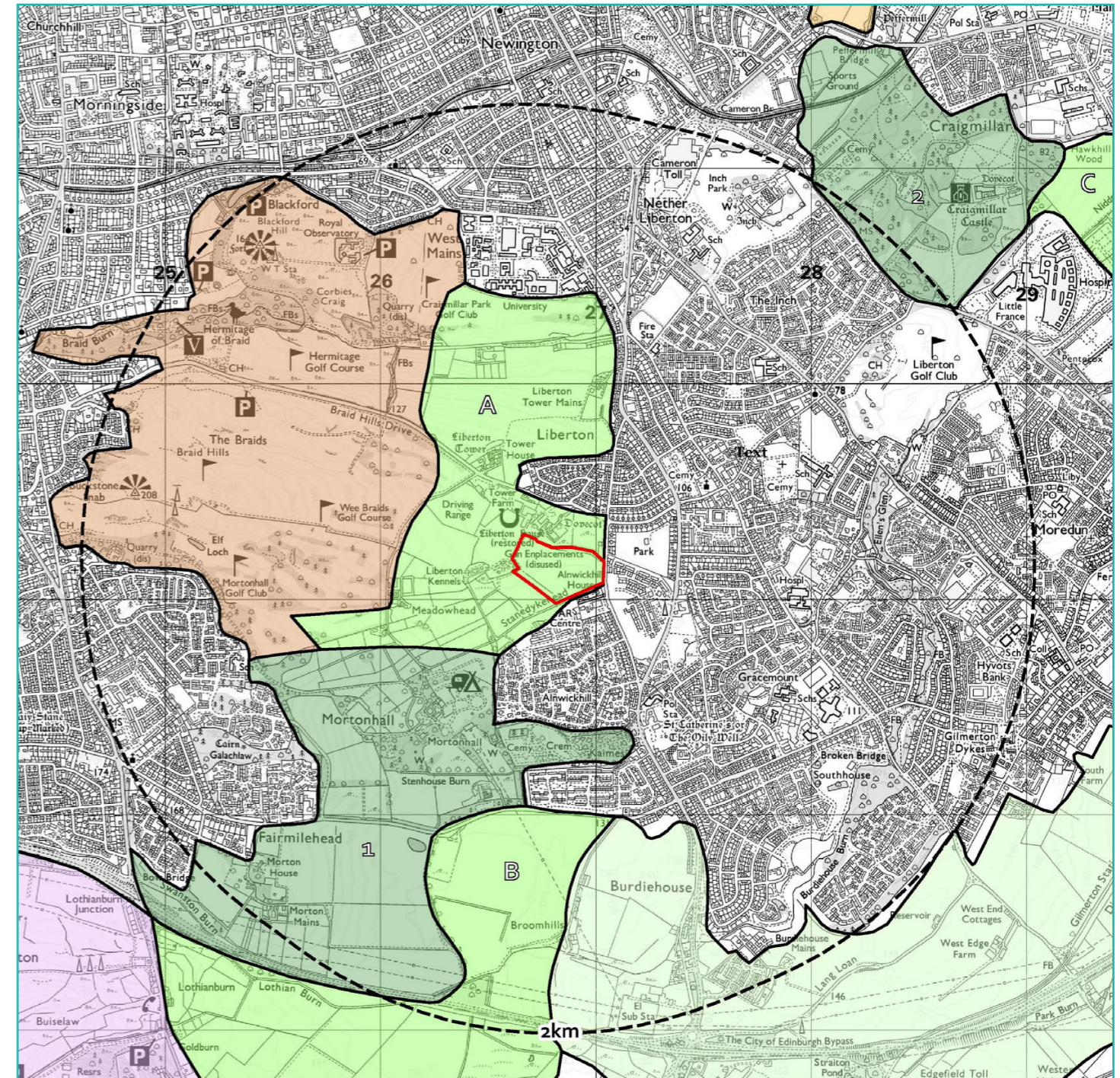
This appraisal has included a review of LCTs defined by the Edinburgh LCA (LUC, 2010), landscape designations and recreational routes within an approximate distance of 2km from the site boundary. The project specification within the Edinburgh LCA states that “open spaces which make a significant contribution to Edinburgh’s landscape or townscape should be included in the landscape character assessment”. Within the 2km study area there are six discrete LCTs identified within the Edinburgh LCA (LUC, 2010) as:

- Prominent Urban Hills LCT: Braid Hills LCA sub-type no. 52;
- Policy Landscape LCT: Mortonhall Policies LCA sub-type no. 53;
- Settled Farmland LCT: Liberton Fringes LCA sub-type no. 54;
- Policy Landscape LCT: Craigmillar Policies LCA sub-type no. 48;
- Rolling Farmland LCT: Burdiehouse Farmland LCA sub-type no. 44; and
- Settled Farmland LCT: Broomhill Farmland LCA sub-type no. 43.

Landscape Character Area 54: Liberton Fringes scored low (one) on integrity of landscape character due to it being: “diminished by dispersed built development including a former anti-aircraft gun battery position dating from the Second World War, riding stables, kennels and a golf driving range.” The “Visual Contribution to the landscape setting of settlements” scored two but described the area as “not of intrinsic scenic quality”. The LCA describes the area as having “limited scope for improving accessible open space” but having potential to contribute to the Forest Habitat Network (FHN) through “small generalist woodland expansion (which would) link the isolated areas of FHN and reinforce links to the Braid Hills and Mortonhall.”

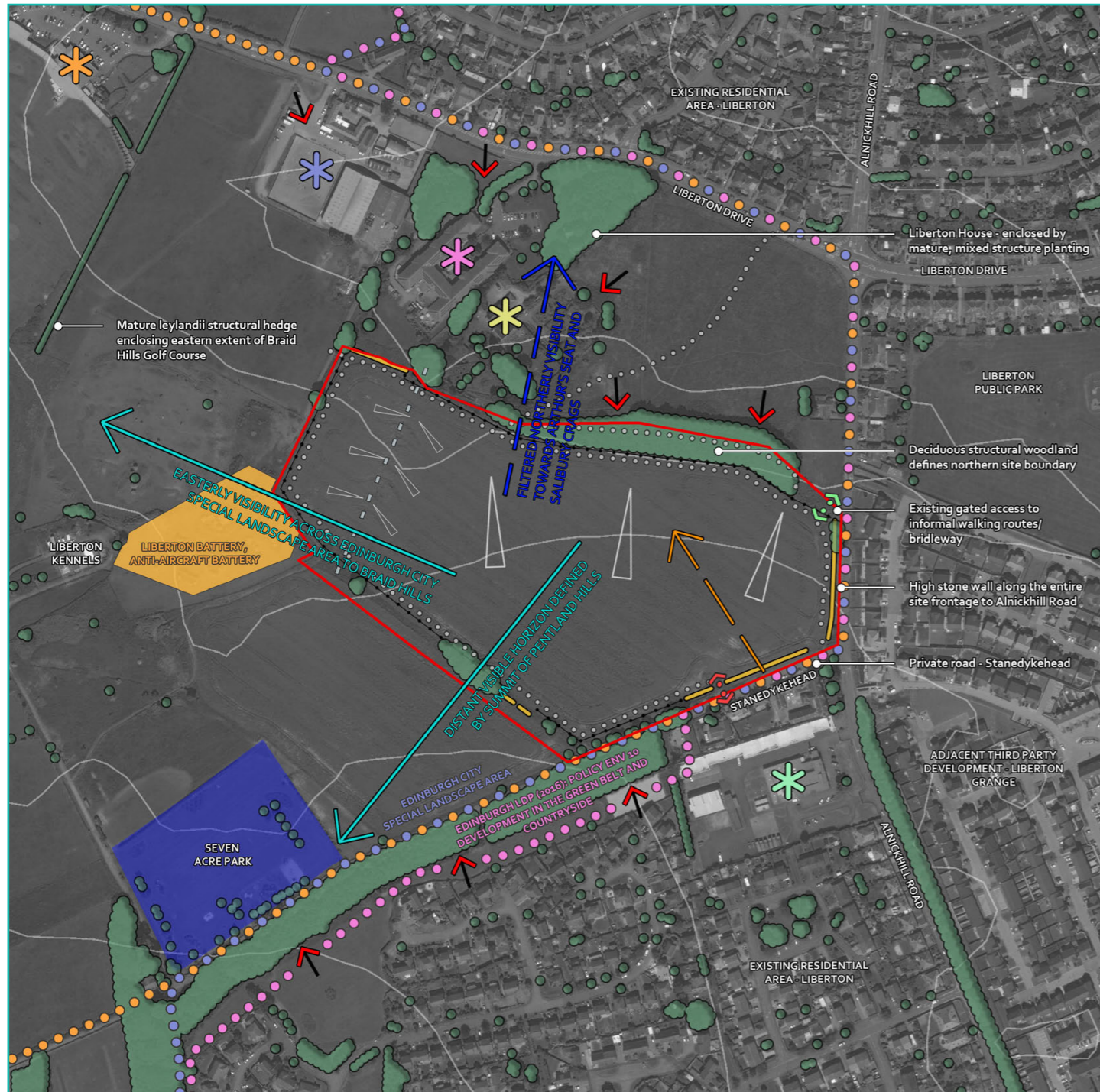
opposite: Edinburgh LCA Landscape Character Areas

below: Internal view from site looking west



#### Legend

- |  |  |
|--|--|
| Site boundary                                      | <b>Regional Character Area: Lothian Farmland</b> |
| Study area (2km offset from site boundary)         | Settled Farmland                                 |
| <b>Regional Character Area: City of Edinburgh</b>  | A. Liberton Fringes                              |
| Prominent urban hill - Braid Hills                 | B. Broomhill Fringes                             |
| Recreational open space - Prestonfield Golf Course | C. Craigmillar Farmland                          |
| <b>Regional Character Area: Pentland Hills</b>     | Policy Landscape                                 |
| Pentland flanks - North Pentland slopes            | 1. Mortonhall Policies                           |
| Pentland hills - upper slopes and summits          | 2. Craigmillar Policies                          |
|  | 3. Edmonstone Policies                           |
|  | Rolling Farmland - Burdiehouse farmland          |



**Legend**

- |                                      |   |   |
|--------------------------------------|---|---|
| Site boundary                        | Edinburgh LDP (2016): Policy ENV 10         | Braid Hills Golf Centre                       |
| Existing vegetation                  | Edinburgh City Special Landscape Area       | Territorial Army - Military Recruiting Office |
| Existing contours                    | Core Path Network                           | Seven Acre Play Park                          |
| Existing slopes                      | Informal footpaths/bridleways               |   |
| Existing post-and-wire fence         | Existing pedestrian gated access            |   |
| Existing stone wall                  | Existing site access from private road      |   |
| Distant views                        | Existing overhead utility/Transmission line |   |
| Filtered views                       | Liberton House (restored)                   |   |
| Views into proposed development site | Braid Hills Care Home                       |   |
| Restricted views                     | Tower Farm Riding Stables                   |   |

opposite: Landscape Site Analysis

# 5.0 SITE ANALYSIS

## 5.1 Site Description

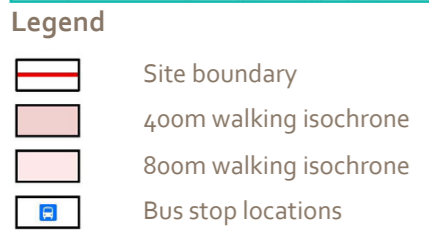
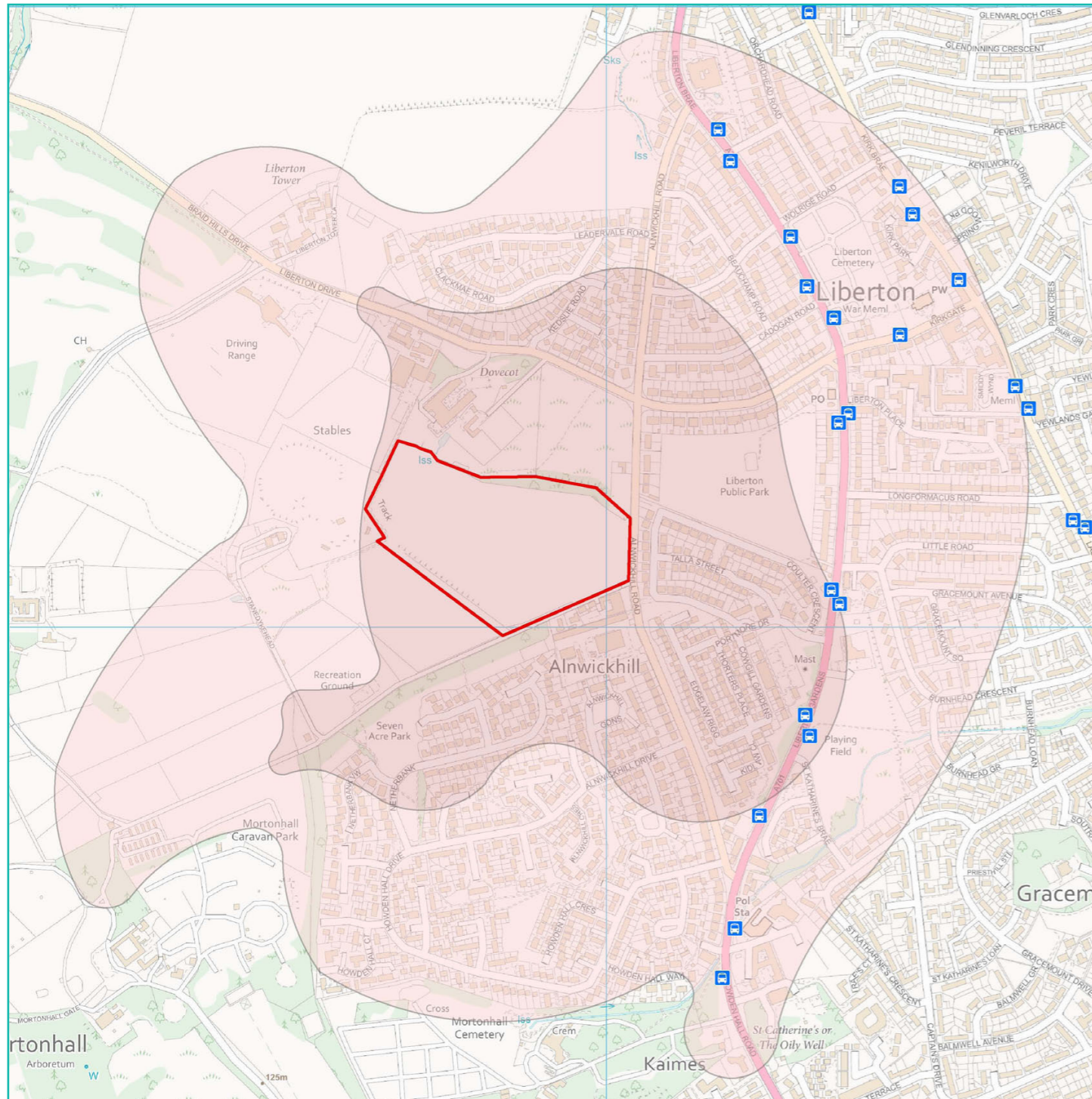
The site is generally undulating, falling broadly in a south to north direction with a high point of around 130 AOD in the southern corner and a central east-to-west ridgeline of around 125 AOD, falling to 115 AOD around the north-western corner. Within this there is a prominent low undulation running broadly southwest to northeast in the western section of the site which has been utilised to accommodate a series of transmission poles (see opposite). Land within the site boundary at present is used entirely as arable land.

Given that the site is at present put to arable crops, traditional boundary treatments consist of low-level timber post-and-wire fencing aside from the high stone wall along the eastern boundary. In combination with the relatively open character of the surrounding landscape, extensive views are therefore afforded from a good portion of the site towards focal elements outwith the site boundaries.

From other areas within the site, particularly looking north and east, views are partially restricted by the well-established woodland belt along the site's northern boundary, and by the stone wall and emerging built form of Liberton Grange to the east. Looking north from the higher points of the site however, it is possible to experience uninterrupted views beyond the shelter belt and existing built form towards Arthur's Seat and Salisbury Crags.

Towards the western edge of the site where the landform dips fairly dramatically before rising again to meet the site boundary, views from within are contained to a large degree, although it is still possible to view the Pentland Hills to the south.





above: Walking Isochrone Plan  
 opposite: Quiet Routes Proposed Network (CEC, 2015)

**5.2 Walking Isochrones**

In order to understand the strategic location of the site, a walking isochrone plan was developed which illustrates the site’s proximity to local bus routes.

The plan illustrates 400m and 800m walking isochrones, which broadly indicate 5 - 10 minute average walking timeframes. The plan illustrates that four bus stops would be accessible for residents and visitors to the site along the A701 (Liberton Brae) within approximately five minutes walking time, whilst a further 15 bus stops would be available within 800m.

Bus stops along Liberton Brae are currently served by a range of providers and routes which include:

- Lothian Buses which provide Services 7, 37, 47 and 67; and
- Borders Buses which provide Services 62 and X62.

The majority of these routes offer direct links with Edinburgh city centre, with travel times of approximately 20 minutes, subsequently providing ample opportunity for further travel links at Waverley train station and Princes Street tram stops.

The promoted site would therefore clearly provide sufficient access to public transport for potential residents and visitors, and would subsequently accord with the recommended ‘walkable neighbourhood’ guidelines outlined within the Designing Streets publication (Scottish Government, 2010).

**5.3 Active Travel**

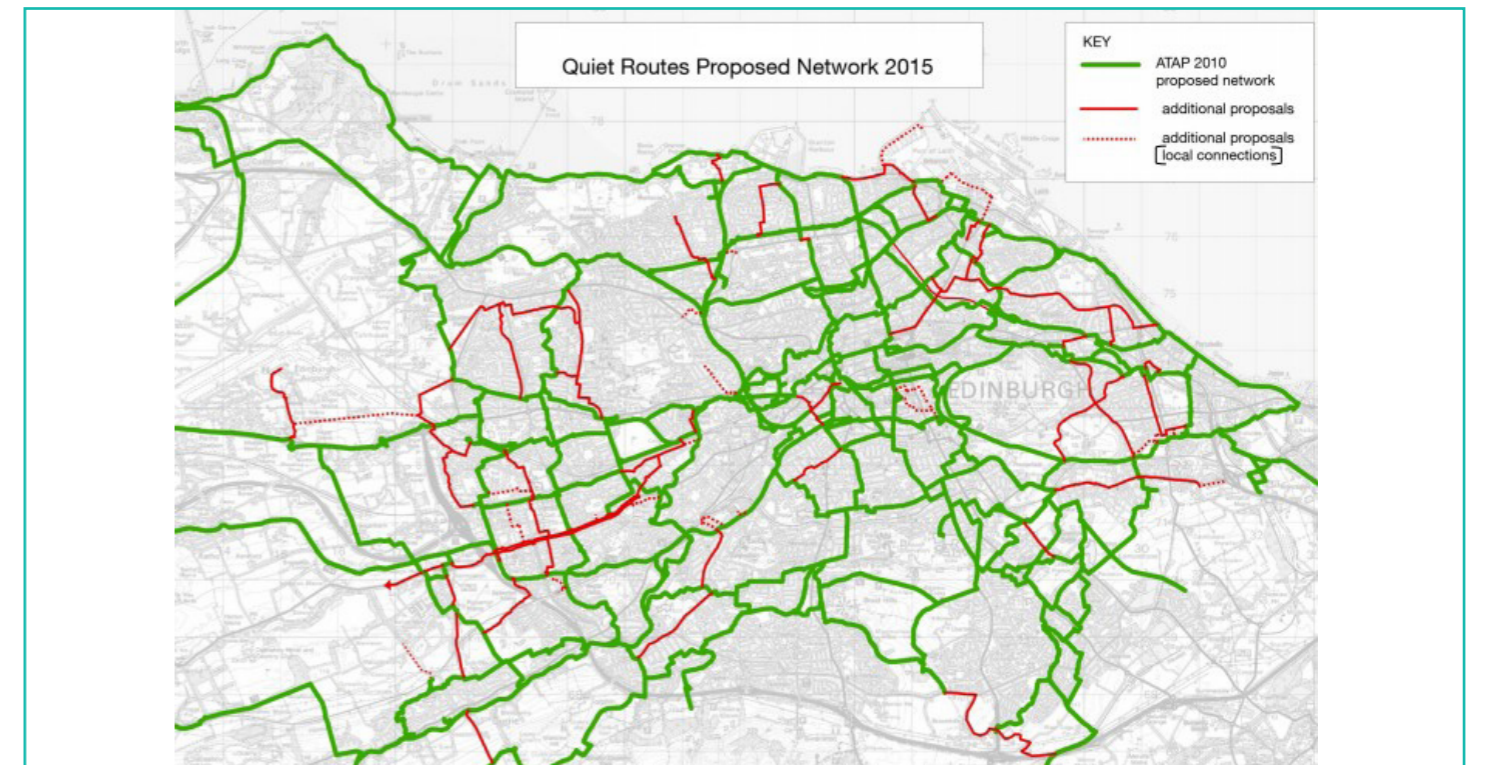
In 2016, the City of Edinburgh Council produced the second edition of their Active Travel Action Plan (ATAP) which outlined their “practical set of actions aimed at increasing the levels of walking and cycling in Edinburgh”.

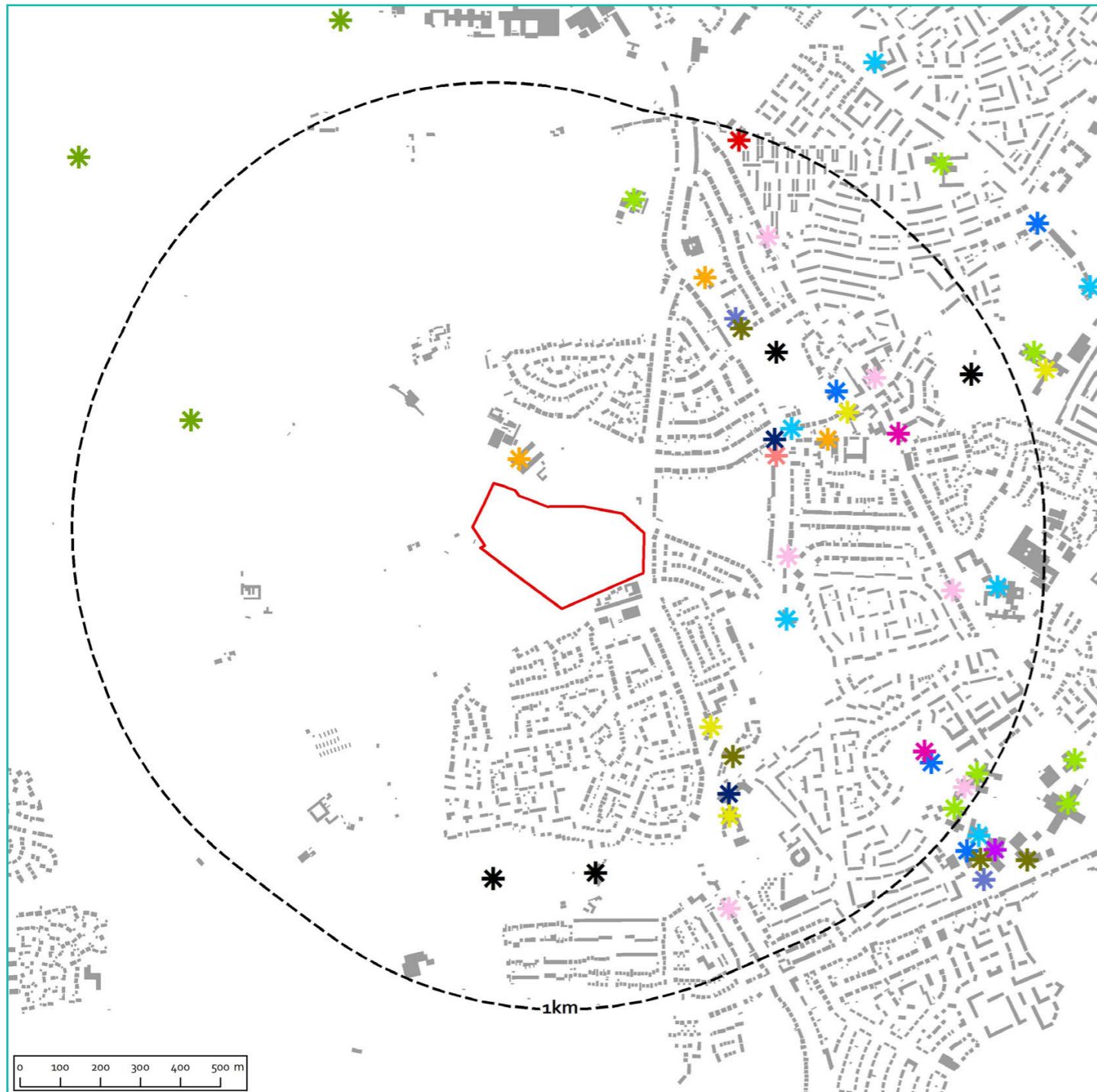
The ATAP promoted a series of ‘QuietRoutes’ which aim to provide cyclists with convenient routes which utilise traffic-free paths, quiet roads or cycle paths separated from traffic where possible. The routes set out to achieve the same standard as the Sustrans National Cycle Network, and in many cases will link to recognised routes.

As part of the proposed network, there would be a QuietRoute to the west of the site which follows the eastern edge of Braid Hills and Mortonhall Golf Courses (see graphic below). This would in turn provide further cycle connections across Edinburgh.

Additionally, given the site’s city location, the surrounding road network generally provides access to cycle lanes which provide safe access to the wider area.

The core path network is immediately accessible from the site’s southern and eastern boundaries, providing wider links to the surrounding area, including the extensive core path network at Braid Hills.





Site boundary	Fire station	Police station
1km offset from site boundary	Golf course	Post office
Existing building footprint	Leisure centre	School
Bank	Local shop	
Care Home	Medical facility	
Cemetery/ crematorium	Nursery	
Church	Other community facility	
Community centre	Pharmacy	

opposite: Local Features (showing 1km offset from site boundary)

below: Graphic illustrating areas of open community green space

### 5.4 Local Features and Landuses

The site's location provides easy access to facilities within the local and wider area, including public services and greenspaces, many of which can be found within easy walking distance.

Examples of facilities within the local area are shown on the plan opposite (Local Features), and include:

- Liberton Public Park (approximately 80m northeast of site);
- Braid Hills BUPA Care Home (approximately 110m north of site);
- Tower Farm Riding Stables (approximately 115m northwest of site);
- Seven Acre Play Park (approximately 150m southwest of site);
- Liberton Medical Practice (approximately 380m east of site);
- Liberton Gardens Sub Post-Office (approximately 400m northeast of site);
- Mortonhall Caravan and Camping Park (approximately 550m south of site);
- Liberton Golf Club (approximately 1.6km northeast of site);
- Braid Hills Golf Club (approximately 1.9km west of site); and
- Numerous local shops and eateries within easy walking distance.



Site boundary	Site boundary
2km study area	2km study area
Building footprint	Building footprint
Greenspace	Greenspace



# 6.0 SITE APPRAISALS

## 6.1 Ecology

An updated Preliminary Ecological Appraisal (PEA) of the site was undertaken on the 20th March 2020 and aimed to reaffirm all broad habitat types within the site boundary and an update to the presence of protected and notable species and their supporting habitats. The survey area encompassed the area of the site plus an outer 50m Zone of Influence (ZoI) (illustrated on the Phase 1 Habitat and Ecological Observations Drawing opposite). The site was previously subject to a PEA in May 2018.

The site consists of an arable field that was previously sown with a cereal crop. The majority of the land shows poor species diversity. The eastern boundary is a stone wall. The northern boundary is a post and wire fence with an area of scrub and woodland within the Zone of Influence (ZoI). The western boundary contains a strip of tall ruderals with scattered trees and the southern boundary consists of a low stone wall, scrub and scattered trees. The field is surrounded by a well-defined footpath used by dog walkers and horse riders.

The mature trees along the field boundaries in the west, north and south of the survey area display features which may have the potential to support roosting bats. It is recommended that these trees are retained as part of the promoted site, as per the mitigation hierarchy. If any of these trees require to be felled or disturbed by any future development, then further bat assessment may be required.

The woodland, tall ruderals and hedgerows provide suitable nesting habitat for breeding birds. It is recommended that any required vegetation maintenance or clearance works are undertaken outside the bird nesting season, which occurs from March to August (inclusive). If vegetation maintenance or removal is planned during the nesting season, a nesting bird check should be completed by a suitably qualified ecologist, immediately prior to any works commencing.

It is recommended that biodiversity is promoted on site through the use of green infrastructure and green networks. The western boundary could be enhanced through the planting of native tree species to create a habitat corridor linking areas of woodland to the north and south of the site. Within the site design it is recommended that planting includes mixed floral meadows, native wildflower meadows, grass meadows and the use of Edinburgh Pollinators Species mix. Swift are a priority species in the Edinburgh Biodiversity Action Plan and the use of swift bricks and/or artificial nest boxes are recommended.



above: Existing structural tree belt to northern site boundary

opposite: Phase 1 Habitat and Ecological Observations Plan



### Legend









- Site boundary
- 50m Zone of Influence
- C3.1 Tall herb and fern -Other, Tall ruderal
- J1.1 Miscellaneous - Cultivated/ disturbed land, Arable
- A3.1 Woodland and shrub - Parkland scattered trees, Broad-leaved

### Target Notes

- 1) Ash, Tree tag No. 847
- 2) Sycamore, Tree tag No. 848
- 3) Ash, Tree tag No. 849
- 4) Elm, Tree tag No. 850
- 5) Ash, Tree tag No. 851
- 6) Ash, Tree tag No. 852
- 7) Ash, Tree tag No. 853
- 8) Bamboo



**Legend**

- |   |  |
|---|--|
|  Site boundary             |  Existing Category U trees                    |
|  Existing Category A trees |  Scrub or Woodland group                      |
|  Existing Category B trees |  Root protection area                         |
|  Existing Category C trees |  Construction exclusion zone protective fence |

opposite: Tree constraints plan

below: Woodland W1 looking south towards Arthur's Seat

**6.2 Arboricultural Impact Assessment**

An Arboricultural Impact Assessment was carried out by Alan Motion Tree Consulting Ltd on behalf of Brindley Associates. The original assessment will be refreshed when required as the application progresses through the planning system.

The assessment was carried out in accordance with BS5837:2012 "Trees in relation to design, demolition and construction - Recommendations." Small trees of less than 10cm stem diameter, and areas of undergrowth were described in general terms but not recorded in detail, except where their condition or presence merited particular attention. Within larger groups of woodlands, trees were described collectively except where dominant specimens merited individual recording.

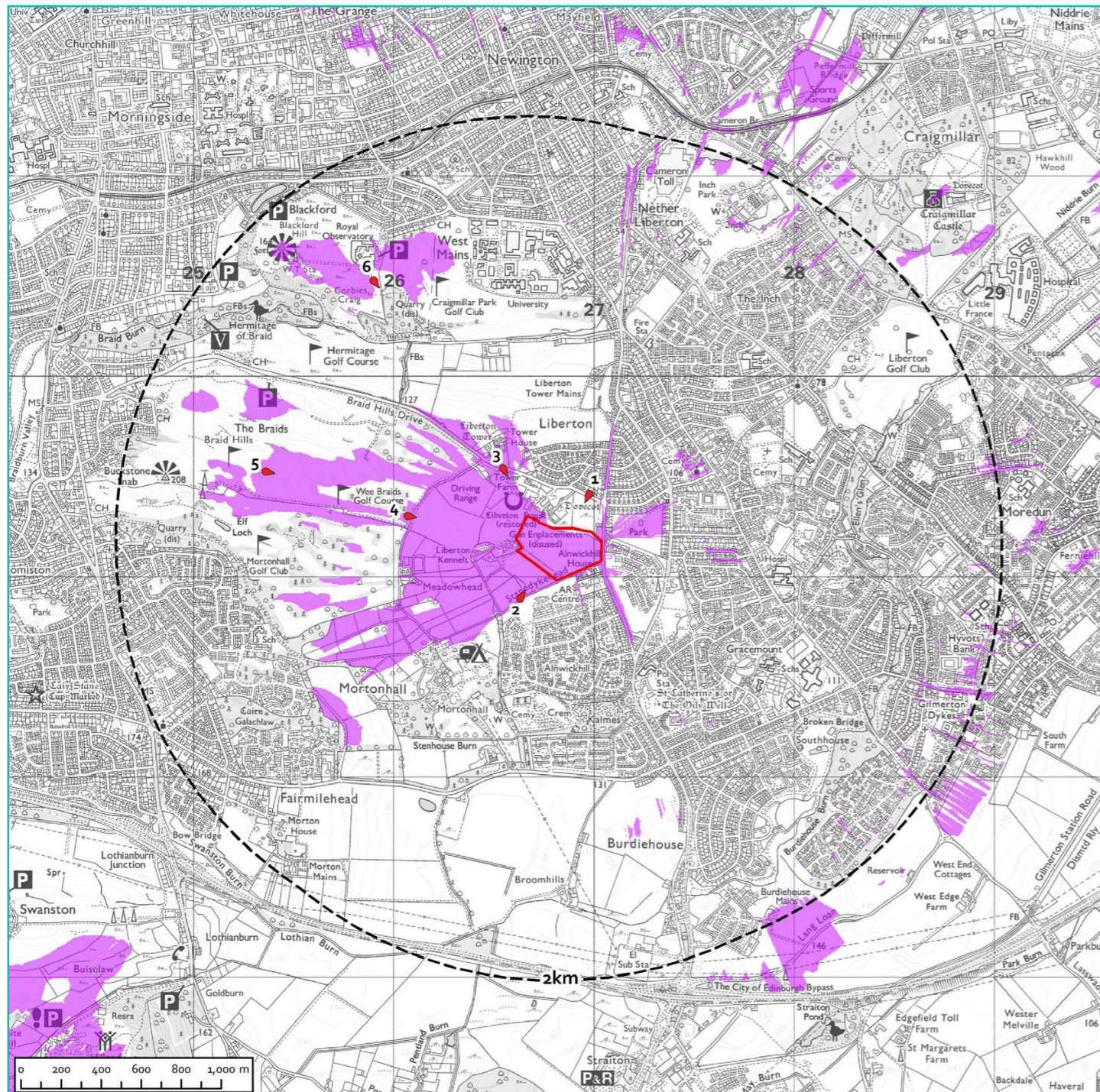
The woodland identified as W1 in the drawing opposite, is in early maturity and of good condition. The relatively young trees of small diameter, coupled with the long-term cultivation of the adjacent land, means that root growth into the site will be very limited. The woodland is located to the north of the site, so shading will be absent to the south. In combination, these factors mean that the woodland does not present any significant constraint along this boundary. A minimal 5m exclusion zone would provide sufficient space for future tree growth to limit longer-term nuisance from overhanging tree canopies.

Field boundary trees along the southern boundary to Stanedykehead are of varied quality, with some early mature specimens amongst older, poorer trees. The long-term future of ash is uncertain due to the potential impact of Chalara ash dieback, so the long-term retention of these trees within any future development is unlikely to be successful. Nonetheless, they provide an important visual impact, and retention of the better quality trees, enhanced by new and replacement planting, should be considered.





The field boundary trees along the southwest edge of the site are of lower quality. Again comprised solely of ash, these are further compromised by poor structure as a result of past coppicing. They could not be successfully retained within a developed site, and should not be seen as a constraint on future use.

There are a few individual specimens on or adjacent to the boundaries to the west and north. One early mature ash in the west is in good condition, but its isolation and long-term prognosis due to disease, means that it should not be seen as a significant constraint. Two further trees in the northwest corner are immediately beyond the site boundary. They will require adequate exclusion zones to allow their safe retention.





**Legend**

-  Site boundary
-  2km study area (offset from site boundary)
-  LVIA Viewpoint locations
-  Area from which proposed developable area is theoretically visible

**ZTV Run Data**

Site centre: 326823, 669143  
 Resolution: 5m  
 Calculation: Single development  
 Counting method: 1 for each point visible  
 Visible points: Ridgeline height (8.5m)

**Notes**

1. Predicted visibility is defined from an observer eye level of 2m above ground.
2. Created using Ordnance Survey Terrain 50 dataset at 5m grid intervals.
3. The analysis does not take into account intervening screening by vegetation or buildings.
4. Reproduced from 1:25,000 scale mapping by permission of Ordnance Survey.
5. Earth's curvature and light refraction has been included in the calculation.
6. The software used to create this ZTV does not use mathematically approximate methods.

**% of 2km study area with theoretical visibility: 09.67%**

opposite: Modified Zone of Theoretical Visibility

below: Existing built form adjacent to eastern and southern site boundaries

**6.3 Landscape and Visual Appraisal**

A Landscape and Visual Appraisal was prepared by Brindley during March 2020. The purpose of the LVA was to identify the landscape and visual constraints and opportunities of the site. As a result, the LVA provided guidance to the site and in particular the proposed developable area to ensure that:

- The promoted site can be integrated within its surroundings; and
- Potential landscape and visual effects can be suitably mitigated where possible by an appropriate development layout.

The LVA examined the suitability of the site to accommodate the proposed developable area as shown on the Landscape Development Framework also prepared by Brindley (see section 7.0).

This process involved the production of a series of Zone of Theoretical Visibility (ZTV) drawings to inform the design team of the areas within the site which would result in reduced theoretical visibility. These ZTVs provided suitable evidence to enable proposed developable areas within the site to be identified. Following this, a final ZTV was run from a central location within the proposed developable area (see opposite), thereby providing a theoretical visibility overview of the site.

A Landscape Development Framework was then produced which would provide a level of landscape and visual mitigation of the site within the 2km study area and has also been designed to provide additional biodiversity value to the existing baseline conditions.





**Legend**

- Site boundary
- Outline of adjacent housing development
- Theoretical visibility of adjacent development

**Notes**

1. Predicted visibility is defined from an observer eye level of 2m above ground.
2. Created using Ordnance Survey Terrain 50 dataset at 5m grid intervals.
3. The analysis does not take into account intervening screening by vegetation or buildings.
4. Reproduced from 1:25,000 scale mapping by permission of Ordnance Survey.
5. Earth's curvature and light refraction has been included in the calculation.
6. The software used to create this ZTV does not use mathematically approximate methods.

*opposite:* Modified Zone of Theoretical Visibility from adjacent development at Liberton Grange

In addition to the modified ZTV produced to reflect potential visual effects of any future development on the promoted site, a ZTV was also produced from the adjacent recent development at Liberton Grange. This provided a direct comparison between the existing visibility of Liberton Grange and the Alnwickhill Road site

- below:*
- 1- 2 Views towards Liberton Grange from within site
  - 3- 4 Liberton Grange development

The resulting modified ZTV (see opposite) shows a very similar visibility pattern to that of the promoted site (see page 13).

The main areas of visibility follow a very similar pattern - extending west towards Braid Hills and southwest towards Mortonhall. Visibility also extends northwest to the Royal Observatory.

This visibility mapping exercise demonstrates that any development within the Alnwickhill Road site will generally only be visible from areas which currently have visibility of the recent residential development at Liberton Grange. It can therefore be assumed that the inclusion of any future built form within the promoted site would not incur a significantly different level of visibility than that already experienced.

Following the mitigation proposals outlined within the design response (see Section 7.0) and subsequently illustrated on the Landscape Development Framework, the extensive structural woodland proposed within the west of the site will screen both the promoted site and the existing development at Liberton Grange in views from the west .



### 6.4 Potential Landscape and Visual Effects

The site comprises agricultural land that has been identified by Edinburgh City Council as both Green Belt and a Special Landscape Area (SLA). There are at present no existing landscape structures within the site which would experience a direct impact as a result of any development; there will however be a direct impact on resources within the site boundary; changing its use from agriculture to residential development.

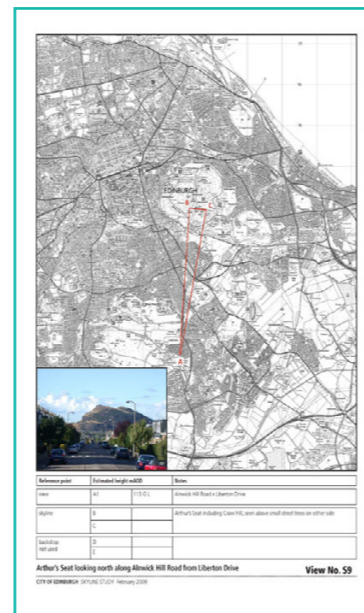
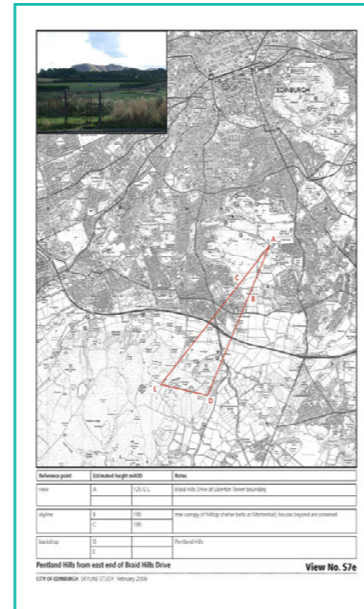
The site is wholly contained within the Liberton Fringes LCA as identified in the Edinburgh LCA (2010), with the integrity of the character “diminished by dispersed built development” as it stands. The development of the site would result in the direct conversion of a relatively small component of land within this LCA for residential land use which would result in unavoidable and significant, but localised, effects.

Within the wider context of the Liberton Fringes LCA, given the prescribed fragmented character, significant effects are not considered likely, particularly north of Liberton Drive where the LCA effectively lies between existing areas of development. Furthermore, when seen within easterly views, the site would be experienced within the appropriate and assimilating context of comparable built form already present within views from the surrounding landscape.

Landscape effects from the neighbouring Braid Hills LCA would be indirect, and would not intrinsically alter the character of the area, although it may be argued that as elevated distant views are a key characteristic of this LCA, new visible development may affect how the landscape is enjoyed. Any effects however would be negligible and not significant given the overall distance and existing context of views. Furthermore, there would be no effects on key views as identified by CEC (CEC, 2009), including nearby views at Braid Hills Drive at Liberton Tower boundary (Key View No. S7e) and Arthur’s Seat looking north along Alnwick Hill Road from Liberton Drive (Key View No. S9). There are not predicted to be any significant effects from the remaining LCAs identified within the study area.

Any future development of the site would also have a direct but localised impact on land designated as Green Belt and SLA. With regards to the SLA designation, initial site assessment identified that areas of the SLA in proximity to the site were of limited value having already been developed to a degree by Tower Farm Riding Stables, Liberton Kennels, Braid Hills Care Home, the driving range and Liberton Battery SM. The sensitive and considered layout and design of any proposed scenario would ensure significant adverse effect on the SLA would be minimised, in accordance with Policy Env 11. Furthermore, given the relatively small footprint of the site in relation to the SLA, which equates to 1.4% - (less when considering the potential development footprint at 0.5%); the overall impact on the 574ha SLA would be minimal.

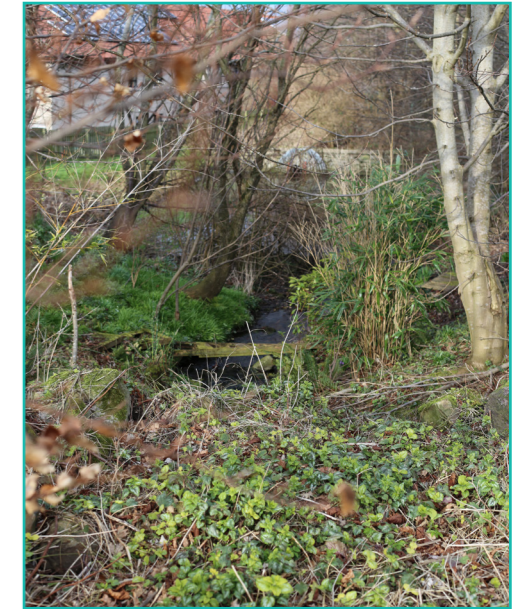
The site would seek to enhance the existing green infrastructure provisions and offer solutions to expand on existing footpath and bridleway connections in line with both policies Env 10 and Des 9.



above:

1. Key View No. S7e
2. Key View No. S9

opposite: Internal site views





Viewpoint 01A: Liberton Drive (East) (Photomontage)

The photograph was taken from the footpath along Liberton Drive approximately zoom directly north of the site.

The viewpoint looks south towards the site and across an unmanaged area of grassland which shows signs of informal use leading towards the site boundary. The eastern extents of the photograph show the existing residential properties along Alnwickhill Road, extending towards the recent residential development at Liberton Grange which breaks the horizon adjacent to the site's eastern boundary. In the centre of the photograph the deciduous structural planting which bounds the northern site extents dominates, heavily filtering views towards the site and beyond.

To the west, distant views of the Pentland Hills are evident beyond the mature shelterbelt central to the photograph, whilst mature mixed structure planting is evident further west enveloping the refurbished Liberton House.

There would be limited visibility towards the site from this location due to the screening afforded by existing intervening vegetation in addition to the proposed additional mitigation planting to the site's northern boundary. Therefore it is considered that significant adverse visual effects would not arise from the site at this location.



Viewpoint 01B: Liberton Drive (East) (Photomontage)



Photomontage - Year 10 (Type 4 - AVR Level 3)

View flat at a comfortable arm's length  
If viewing this image on a screen, enlarge to full screen height

**Viewpoint 02A: Seven Acre Play Park (Photomontage)**

The photograph was taken on the eastern extents of Seven Acre Play Park approximately 175m southwest of the promoted site.

The viewpoint looks northeast broadly towards Alnwickhill Road and Liberton Drive with views of the properties limited to the ridgelines of residencies along the eastern extents of Liberton Drive and properties nearest the eastern site boundary at Liberton Grange.

The left of the photograph is populated by a number of prominent Edinburgh landmarks, namely Liberton Tower, Salisbury Crags, and Arthur's Seat. The central view shows field boundary trees which bound the south-western edge of the site, beyond which the mature deciduous structure planting which visually encloses the northern site boundary is visible.

There is potential for attributable visual effects to be experienced from this location. There are however opportunities present to establish a strengthened boundary to the adjoining Green Belt and SLA boundaries. The considered planting of native species could improve biodiversity and habitat provision while localised enhancement of footpath/bridleway connections could contribute to the Green Network, linking existing recreational open space and play provision through the site via existing core paths that border the southern and eastern boundaries.



Photomontage - Year 10 (Type 4 - AVR Level 3)

View flat at a comfortable arm's length  
If viewing this image on a screen, enlarge to full screen height

**Viewpoint 02B: Seven Acre Play Park (Photomontage)**



Photomontage - Year 10 (Type 4 - AVR Level 3)

View flat at a comfortable arm's length  
If viewing this image on a screen, enlarge to full screen height

**Viewpoint 03: Liberton Drive (West) (Photomontage)**

The photograph was taken from the southern footpath of Liberton Drive, approximately 300m from the western site boundary, adjacent to the Braid Hills Golf Centre.

The viewpoint looks southeast across the Tower Farm Riding Stables and associated paddocks bounded by timber post-and-wire fencing, towards the western settlement edge of Liberton. Residential properties along Liberton Drive are visible to the east of the view, with locally characteristic timber post-and-wire fencing in the immediate foreground. Central to the photograph is the Riding Stables, with the structure planting that encloses Liberton House visible over the ridgeline of the stables buildings.

Changes in visual amenity from this viewpoint are likely to be beneficial as the extent of any future development would be screened by the existing Riding Stables and shelter belt planting associated with Liberton House. The visible portion of the site would consist of open space provision, paddocks, mitigation and enhancement planting of native species - offering biodiversity and habitat improvements and strengthened boundaries to the Green Belt and SLA - and footpath/bridleway connections with Tower Farm Riding Stables.



Photomontage - Year 10 (Type 4 - AVR Level 3)

View flat at a comfortable arm's length  
If viewing this image on a screen, enlarge to full screen height

**Viewpoint 04: Braid Hills Trail (Photomontage)**

The photograph was taken from the Core Path (CEC 2: Braid Hills) approximately 530m west of the site looking eastwards towards the settlement edge of Liberton. This viewpoint offers low-level panoramic views which afford distant visibility of the city and beyond to Fife on a clear day.

The middle ground of the photograph is dominated by the incongruous Leylandii planting associated with the Braid Hills Golf Centre which forms a strong enclosing boundary. The viewpoint has a broadly rural aspect, with the foreground and middle distance views dominated by unmanaged grassland, boundary planting and structure planting associated with residential development. Views at this distance tend to 'block together' residential areas in such a way that they are indistinguishable as individual properties and/or entities.

Although it is likely the site would introduce limited further residential built form to the panorama, this would be experienced in the existing context of existing built form and recent residential development.

The considered siting of any future development, coupled with the design principles outlined in Section 7.0 of this document, including substantial structural woodland planting, are considered to reduce attributable effects upon landscape character and visual amenity experienced in this location.





Photomontage - Year 10 (Type 4 - AVR Level 3)

View flat at a comfortable arm's length  
If viewing this image on a screen, enlarge to full screen height

Viewpoint 05: Braid Hills (Photomontage)

The photograph was taken from a knoll of localised topography overlooking The Braid Hills Golf Course, slightly east of the Buckstone Snab viewpoint on the Braid Hills. The viewpoint looks eastward over the City of Edinburgh and beyond towards the Lammermuir Hills in East Lothian. A number of landmarks are visible in the middle distance, including clear views of Salisbury Crags, Arthurs Seat and the Royal Observatory to the north of the image the University of Edinburgh Kings Buildings further east and Liberton Tower in a fairly central location within the photograph.

The foreground of the photograph shows typically characteristic vegetation and landform associated with a golf course, with areas of unmanaged grassland, well maintained close mown grass, and patches of gorse scrub and structure/shelter belt mature tree planting.

From this viewpoint any new development within the site would be viewed in context with the existing urban character of Liberton, and would not detract from the expansive nature of views afforded from the Braid Hills. Furthermore, given the proposals outlined within Section 7.0 of this document, the view would be enhanced by the introduction of additional structural woodland planting and retention of open space within the western part of the site.



Red line indicates location of site, which is largely screened in this view

Photowire - Year 10 (Type 4 - AVR Level 0)

View flat at a comfortable arm's length  
If viewing this image on a screen, enlarge to full screen height

Viewpoint 06: Royal Observatory (Photomontage)

The photograph was taken looking southeast towards the site from the Royal Observatory, approximately 500m east of the Blackford Hill viewpoint.

The photograph is dominated by the prominent ridge associated with the Braid Hills in the middle distance, characterised by a very open, rural feel in sharp contrast to the townscape visible to the east of the photograph. The foreground of the photograph shows a locally characteristic but poorly maintained dry-stone wall bounding the adjacent Craigmiller Park Golf Club. Edinburgh University King's Buildings are prominent beyond the golf course, with the Lammermuir Hills breaking the distant skyline. Central to the photograph, Liberton Tower is visible on the crest of the ridgeline.

The Royal Observatory is a popular recreational destination, and provides a Key View (S2a) north towards Edinburgh Castle.

From this viewpoint looking southeast, the site would be almost entirely screened by intervening landform, mature mixed woodland and Liberton Tower. The implementation of the proposed structural woodland planting within the western part of the site would provide additional screening - including within views towards the recent development at Liberton Grange, resulting in an enhanced overall view.

# 7.0 DESIGN PRINCIPLES

## 7.1 Mitigation Proposals

Following identification of a suitable developable area within the site, the design team identified a design response to ensure minimal attributable effects on the existing landscape and visual resource, both within the site boundary and the surrounding area.

Key design principles were developed which considered the layout, design and siting of key elements within the site by:













- Limiting the developable area to approximately 100 units, promoting a locally appropriate **housing layout density**;
- Promoting substantial new areas of locally appropriate woodland and structure tree belts along the western developable area boundary and along the northern site boundary to provide containment and privacy whilst minimising potential significant effects from the wider area;
- Retaining the existing strong boundary wall along the eastern site boundary where possible whilst providing safe site access;
- Retention of existing woodland and tree belts along the northern and south-western site boundaries which provide substantial visual mitigation;
- Retention of large areas of open space within the western area of the site, providing substantial usable recreational green space for existing and potential residents and visitors and improving views from the west;
- Standing off the eastern and southern site boundaries to allow 'breathing space' for existing homes along Alnwickhill Road and Stanedykehead with areas of individual trees or small tree copses to provide a pleasant outlook;
- Promotion and retention of footpath and potential cyclist connections through the site, linking directly with Core Path CEC2 - The Braids and with the wider road and footpath network;
- Promotion of structural shrub planting along the south-eastern and eastern developable area boundaries to provide a level of screening and security for potential residents;
- Ensuring the layout of any proposed homes would follow the contours of the landform where possible in order to avoid overly steep gradients and reduce cut-and-fill and associated disturbance of existing contours; and
- Ensuring the suitable location of SuDS within the site.

The identified design responses would be further enhanced by:

- Using suitable materials where new surfaces are to be constructed;
- Promotion and specification of locally appropriate species such as beech, hawthorn, birch and rowan in accordance with the ecologists recommendations;
- Promotion of tree, hedgerow and occasional ornamental shrub planting along proposed internal roads and footpaths to enhance local landscape structure and character; and
- Providing an attractive, maintained edge to the existing Liberton Battery Scheduled Monument immediately west of the site, thereby retaining/ enhancing its existing setting.



### Legend

 Site boundary	 Proposed structural shrub planting
 Existing vegetation to be retained	 Proposed hedgerow
 Existing open space/ paddock to be retained	 Proposed SuDS
 Existing adjacent development	 Proposed developable area
 Proposed tree planting	 Proposed internal circulation
 Proposed structural tree planting	 Proposed pedestrian route

## 8.0 SUMMARY AND CONCLUSIONS

The promoted site is being brought forward for allocation within the upcoming City Plan 2030 (Edinburgh City Council, 2020).

This document seeks to provide an insight into the iterative design process which has culminated in the identification of a developable area within the site in addition to landscape and visual design principles which seek to mitigate significant effects.

Throughout the design process, careful consideration has been afforded to the site with respect to its designation; namely the Braids, Liberton and Mortonhall SLA, in addition to its Green Belt allocation. The resultant design has sought to ensure any effects on the SLA as a result of any future development would be minimised where practicable. There would therefore be no resulting erosion of the function or integrity of the SLA following implementation of the proposals.

The resulting layout can provide a deliverable, locally appropriate, suitably mitigated site which could be delivered without adversely affecting the surrounding landscape character or wider visual amenity.

In respect to landscape, the Landscape Development Framework (opposite) takes particular note of the existing landscape character and its relationship with nearby residents by ensuring ample greenspace within the western part of the site, forming an attractive, well connected and usable space for visitors and residents.

From a visual perspective, the surrounding area provides extensive views, particularly from Braid Hills to the west of the site. These existing views are however broadly urban in nature, with views towards the site further urbanised by the recent development at Liberton Grange.

The mitigation proposals put forward as part of the Landscape Development Framework (see opposite) would provide a largely wooded backdrop in views from the west following its successful implementation, and would therefore assist in retaining the character of the SLA.

This promotional document has set out to provide a clear indication of the suitability of the site for allocation within the upcoming City of Edinburgh Local Development Plan.

Following the implementation of the outlined mitigation measures and adherence to recommendations put forward by the various appraisals within this document, it is considered that the 5 year plan for 100 homes submitted by Mactaggart and Mickel could be successfully achieved.





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