

Customer Ref: 01713      Response Ref: ANON-KU2U-GT2P-4  
Name: Holder Planning  
Response Type: Agent / Consultant  
On behalf of: Stewart Milne Homes

Supporting Info: Yes  
Email: robin@holderplanning.co.uk

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: Not Answered

Explanation: This is a laudable ambition, but there is not enough information given to agree or disagree.

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: Not Answered

Explanation: There is not enough information given to agree or disagree. We support the principle of providing green and blue infrastructure where practical and affordable.

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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 There is not enough information given to agree or disagree. There is already detailed policy and guidance in respect to water management, taking account of climate change, and further information is required on what is proposed in order to allow meaningful comment.

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

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Choice 1 E

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

Short Response

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

Choice 1 F

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

Short Response

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

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Choice 1 F

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

Short Response

Explanation

Choice 1 G

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

Short Response

Explanation We obviously agree with the principle of having enough space for burials, but we caution against identifying such space in a plan, as landowners may not bring it forward for such use. Instead we would recommend a criteria based policy to allow providers to identify the sites most fit for purpose, and for this to be considered in the context of that policy.

Choice 1 H

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

Short Response

Explanation It is stated that the Council favours factoring on behalf of private landowner(s) and we support this. We do not favour adoption by the Council.

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Choice **2 A**

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

Short Response

**Explanation** There is not enough information given to agree or disagree. It is important that the requirement “to demonstrate” is reasonable and proportionate. There are already various policies and guidance that require such demonstration and it is not made clear what change is proposed. Care should be taken not to require onerous submission requirements to add to the already heavy and expensive burden of documentation to be submitted with a planning application.

Choice **2 B**

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

Short Response

**Explanation** We acknowledge the Council’s aspiration to ensure the efficient use of land by achieving enhanced density and coverage across development sites. While we would caution that challenges will inevitably lie ahead in achieving target density in harmony with the existing scale, character and settlement pattern of peripheral locations, we will work with the Council to achieve its ambitions.

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Choice **2 C**

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

Short Response

Explanation

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** It is important that measures to reduce Carbon are brought in safely, efficiently and in the knowledge that they will make a real and lasting reduction to carbon emissions. The Platinum standard of the build regulations is currently incomplete (i.e. the text under the sub headings in the current document is 'not currently defined' for all sections except CO2 emissions), therefore it is not known what the rest of the standard will require. This is critical when looking at the overall design, functionality and efficiency of buildings. It is therefore very difficult to quantify the impact that the Platinum standard will have on the design, build program and cost of buildings. Moreover, it is not clear whether the required the supply chain and expertise to implement any additional measures is available. The Government has responsibility for amending building regulations to ensure future sustainability. In our view it is critical that LDP policies should align with these, otherwise there is a significant risk that different Councils will have differing requirements. Housebuilders and their supply chains would find it almost impossible to work in such an adhoc and piecemeal policy context. We are firm in the view that emissions standards for new buildings should continue to sit within the building standards regulatory regime.

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** See answer to Q4B below  
Great care will be needed to ensure that participants are well-informed about constraints and opportunities, to avoid unrealistic expectations and outcomes. It will also be important to avoid delay to what already appears to be an overly-ambitious timetable for the delivery of housing. Moreover, it is strongly recommended that developers are involved in the process, to provide their expertise and experience.

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

Choice **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** There is not enough information given to agree or disagree. Care should be taken in assessing what is required and ensuring that the requirements for new infrastructure are properly justified, reasonable and proportionate.



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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 There is not enough information given to agree or disagree. The Council's current cumulative methodology has been recently rejected by the Scottish Government. Further work by the Council is therefore needed to demonstrate that its approach to contributions meets the various tests in the Government Circular.

Choice 5 E

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

Short Response

Explanation We agree that statutory supplementary guidance should no longer be used, which is in any case the position in the new Planning Act. In our view, it is crucial that all matters, including developer contributions, that have a significant implication for the viability and delivery of housing are included within the LDP and not within Action Programmes or non-statutory guidance. This approach allows for appropriate consultation and independent scrutiny, which must be the case for such important matters.

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Choice **6 A**

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

Short Response

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

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

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Choice **7 A**

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

Short Response

Explanation

Choice **7 B**

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

Short Response

Explanation

Choice **7 C**

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

Short Response

Explanation

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Choice **7 D**

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

Short Response

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

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

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Choice 8 C

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

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

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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

Choice **10 B**

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

Short Response

Explanation

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Choice **10 C**

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

Short Response

Explanation

Choice **11 A**

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

Short Response

Explanation We recognise that affordability is a challenge in Edinburgh but addressing this will require more housing to be delivered across all tenures and more effective land to be made available. At this stage there is insufficient clarity on how this 35% threshold may be implemented and the details of how this may be considered and as a general rule such a policy would not accord with Scottish Planning Policy paragraph 129, which states; "The level of affordable housing required a contribution within a market site should generally be no more than 25% of the total number of houses".Notwithstanding this, the proposed development will comply with whatever affordable housing policy is ultimately contained in the LDP.



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Choice **11 B**

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

Short Response

Explanation

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Choice 12 A

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

Short Response Not Answered

**Explanation**

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

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

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

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

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

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

Customer Ref: 01713 Response Ref: ANON-KU2U-GT2P-4

Supporting Info Yes

Name Holder Planning

Email robin@holderplanning.co.uk

Response Type Agent / Consultant

On behalf of: Stewart Milne Homes

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

Choice 12 B1

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

Short Response Not Answered

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **12 B2**

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

Short Response

Explanation

Choice **12 B3**

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

Short Response

Explanation

Choice **12 B4**

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

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **12 B5**

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

Short Response

Explanation

Choice **12 B6**

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

Short Response

Explanation

Choice **12 B7**

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

Short Response

Explanation



Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **12 B8**

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

Short Response

Explanation

Choice **12 B9**

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

Short Response

Explanation

Choice **12 B10**

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

Short Response

Explanation

Customer Ref: 01713      Response Ref: ANON-KU2U-GT2P-4  
Name: Holder Planning  
Response Type: Agent / Consultant  
On behalf of: Stewart Milne Homes

Supporting Info: Yes  
Email: robin@holderplanning.co.uk

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**  
Stewart Milne do not object to any of the housing allocations proposed in Choices 2030. However, as explained in answer to Q12A, the number of greenfield allocations proposed by all three strategy options is significantly less than needed to approach meeting Edinburgh’s housing need and demand. In particular there is almost a complete absence of smaller housing sites proposed, which could make a significant contribution to the significant shortfall in housing provision in the short to medium term. Although the allocation of large strategic sites is to be welcomed, past experience is that such sites will have long lead-in times and will be dependent on significant infrastructure provision, which in many cases is not yet in place. With that in mind, Stewart Milne are therefore seeking the allocation of a site for housing at Ransfield Farm, within the South Ratho Assessment Area. A comprehensive design document has been prepared by Barton Willmore and this is submitted in response to Q12C. It should be emphasised that this document was prepared to take account of the main points raised by the 2016 LDP Reporter and an Appeal Reporter in 2017, to produce what in our view is an appropriate scale and form of development reflecting the character of the area. The proposals have not so far taken account of the emerging proposed policies in Choices 2030, but Stewart Milne would be content to amend the proposed design/layout to meet the requirements of the replacement LDP in due course. Respectfully, it appears to us that the non-identification of the site for potential housing development in Choices 2030 may be partly due to a number of incorrect assumptions and conclusions in the Site Assessment contained in the Choices 2030 Housing Study. We appreciate that the preparation of such assessments for so many sites is challenging, and can lead to broad brush conclusions which do not necessarily reflect the actual circumstances for a particular site. A particular constraint of the assessments undertaken by the Council is that the areas assessed are often larger or have different boundaries to the site being promoted for development. That is not a criticism of the assessment process, but it does mean that the assessment conclusions are not necessarily applicable to the site in question. Indeed, this is the case for Ransfield Farm. It is obviously crucial that the site being promoted is considered on the correct basis, and to assist in this process Stewart Milne has enlisted a number of experts to review the Ransfield Farm site against the various criteria in the Site Assessment. We have therefore listed below each of the Assessment criteria for the South Ratho area and provide comments on where we agree and disagree with the conclusions. It should be noted that the South Ratho area subsumes and is significantly larger than the Ransfield Farm site, which is approximately 5ha in size. Does the site fit within an area identified as a strategic development area? No – The site is not within an identified SDACOMMENT: THIS IS CORRECT BUT SESPLAN 1 POLICY 7 DOES SUPPORT THE ALLOCATION OF SITES IN THE LDP WHICH ARE OUTWITH AN SDA ON THE FOLLOWING CONDITIONS: A. THE DEVELOPMENT WILL BE IN KEEPING WITH THE CHARACTER OF THE SETTLEMENT AND LOCAL AREA; B. THE DEVELOPMENT WILL NOT UNDERMINE GREEN BELT OBJECTIVES; AND C. ANY ADDITIONAL INFRASTRUCTURE REQUIRED AS A RESULT OF THE DEVELOPMENT IS EITHER COMMITTED OR TO BE FUNDED BY THE DEVELOPER AS EXPLAINED IN COMMENTS BELOW, ALL OF THESE CONDITIONS CAN BE MET. WE NOTE THAT A NUMBER OF SITES WHICH HAVE BEEN PROPOSED FOR HOUSING IN CHOICES 2030 ARE NOT WITHIN AN SDA, SO THE COUNCIL DO NOT CONSIDER THIS TO BE A CONSTRAINT TO THE ALLOCATION OF A SITE FOR HOUSING. Does the site support travel by foot to identified convenience services? Yes – The site is within walking distance of local convenience services. COMMENT: AGREED Does the site support travel by foot to identified employment clusters? No – The site is not within walking

Customer Ref: 01713 Response Ref: ANON-KU2U-GT2P-4

Supporting Info Yes

Name Holder Planning

Email robin@holderplanning.co.uk

Response Type Agent / Consultant

On behalf of: Stewart Milne Homes

distance to employment clusters. It is unlikely that access can be improved and employment clusters are unlikely to be provided on the site due to lack of scope for development nearby.COMMENT: THE SITE IS WITHIN WALKING DISTANCE (2,400M) OF THE NEWBRIDGE EMPLOYMENT CLUSTER. ACCOUNT SHOULD ALSO BE TAKEN OF THE FACT THAT THIS IS A RELATIVELY SMALL HOUSING SITE OF 100 UNITS, AND PERHAPS PROXIMITY TO EMPLOYMENT CLUSTERS HAS LESSER IMPORTANCE THAN LARGE SCALE HOUSING RELEASES.Does the site have access to the wider cycle network?No – The site does have access to the wider cycle network but access is impeded by the Union Canal cycle path which is considered at capacity. Access is unlikely to be improved as capacity cannot be improved here and no other suitable potential cycle route interventions have been identified which could serve the site.COMMENT: THE SITE IS WELL LOCATED IN RELATION TO THE LOCAL AND NATIONAL CYCLE ROUTE WITH NCR 754 IMMEDIATELY ADJACENT TO THE SITE, FOLLOWING THE CANAL AND NCR 75 TO THE SOUTH ALONG THE WATER OF LEITH PROVIDING ACCESS TO THE JOBS IN WEST EDINBURGH. THE COMMENT REGARDING THE CAPACITY OF NCR 754 IS SURPRISING AND WHILST IT DOES GET CONGESTED AS YOU GET CLOSER TO THE CITY CENTRE AT PEAK TIMES IT IS CONSIDERED THERE IS STILL AVAILABLE CAPACITY AND MORE SPECIFICALLY AS FAR AS THE EMPLOYMENT IN WEST EDINBURGH. Can the site support active travel overall through appropriate intervention?No – The site would not support active travel overall, as the site is not within walking distance of employment clusters and these are unlikely to be provided through development due to lack of scope for development nearby. Access to the wider cycle network is poor and it is unlikely to be improved through an identified intervention.COMMENT: THIS CONCLUSION IS INCORRECT. THE SITE IS LOCATED WITHIN CLOSE PROXIMITY TO 2 NATIONAL CYCLE ROUTES – NCR 754 AND NCR 75 – AND THERE IS SCOPE TO DESIGNATE QUIET CYCLE ROUTES CONNECTING TO THE NATIONAL NETWORK ON THE RURAL ROADS IN THE VICINITY OF THE SITE. THERE IS THE OPPORTUNITY TO PROVIDE A BRIDGE LINK DIRECTLY FROM THE SITE TO THE TOW PATH ON THE NCR 754.Does the site support travel by public transport through existing public transport network accessibility and capacity?No – The site does not support travel by public transport based on existing or incrementally improved provision.COMMENT: AN APPEAL REPORTER HAS CONCLUDED THAT THE SITE IS SUSTAINABLE IN TERMS OF PUBLIC TRANSPORT. AT PRESENT RATHO IS SERVED BY THE LOTHIAN BUS SERVICE 20 WHICH OPERATES BETWEEN RATHO AND CHESSER ON A HALF HOURLY FREQUENCY DURING THE DAY WITH DIRECT CONNECTIONS TO THE GYLE, EDINBURGH PARK AND THE RAILWAY STATION. THE BUS MARKET IS DE-REGULATED AND BUS OPERATORS WILL RESPOND TO CHANGES IN DEMAND AND PATRONAGE. FURTHER DEVELOPMENT IN RATHO IS LIKELY TO SUPPORT AN IMPROVEMENT TO EXISTING BUS SERVICES.Is the site potentially served by an identified public transport intervention project which is deliverable in the plan period to serve and accommodate development?No – The site may support travel by public transport based on an identified intervention, but this intervention is not deliverable within the plan period.COMMENT –THE CITY MOBILITY PLAN IDENTIFIES A STRATEGIC PUBLIC TRANSPORT INTERVENTION, WHICH COULD BE AN EXTENSION TO THE TRAM, ALONG THE A8 CORRIDOR AS FAR AS NEWBRIDGE. THIS COULD BE DELIVERED WITHIN THE PLAN PERIOD AND WOULD PROVIDE A STEP CHANGE IN PUBLIC TRANSPORT PROVISION WITHIN A SHORT CYCLE OR BUS TRIP FROM THE SITE. Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?No – The site does not have sufficient primary school infrastructure capacity.COMMENT: THIS RELATES TO THE LARGER SOUTH RATHO ASSESSMENT AREA. WE HAVE BEEN ADVISED INFORMALLY BY THE CHILDREN & FAMILIES DEPARTMENT, THAT THE PRIMARY SCHOOL IS LIKELY TO HAVE CAPACITY FOR THE RANSFIELD FARM SITE.Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?No – The site does not have sufficient secondary school infrastructure capacity.COMMENT: THIS RELATES TO THE LARGER SOUTH RATHO ASSESSMENT AREA. FOR A SITE OF THE SCALE OF RANSFIELD FARM, CAPACITY SHOULD BE MADE EASILY AVAILABLE AS PART OF THE COUNCIL’S WEST EDINBURGH NEW BUILD SCHOOL STRATEGY.If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?No – The site does not have sufficient community infrastructure capacity to support development and no appropriate intervention has been identified to address this. A new primary school would be required. A new secondary school would be required. A new secondary school in this area could

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

Supporting Info   
Email

help to address pressures on secondary school capacity from new housing already proposed within West Edinburgh. The Council's preference is to deliver new secondary schools with a capacity for 1200 pupils. If a new 1200 secondary school was delivered it could support a significant amount of additional housing development, but it would have to serve a wide catchment area so good active travel and transport links would be important. There is not enough scope for development on this and nearby sites to support this level of intervention.COMMENT: AS ABOVE, WE DISAGREE WITH THIS CONCLUSION. THERE IS LIKELY TO BE CAPACITY IN THE EXISTING PRIMARY SCHOOL FOR THE PROPOSED HOUSING SITE, AND THE COUNCIL'S NEW BUILD SECONDARY STRATEGY SHOULD EASILY BE ABLE TO ACCOMMODATE THIS SCALE OF DEVELOPMENT. Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?Partially – Some limited scope for development is identified on this site, directly to the south of existing housing at Ratho extending down the slopes to above the closest valley, as the existing housing in unscreened and highly visible. Advance planting of woodland should be undertaken to provide a new and firm edge to settlement.COMMENT: THIS IS A REFERENCE TO THE RANSFIELD FARM SITE AND WE AGREE WITH THE CONCLUSION THAT THERE IS SCOPE FOR DEVELOPMENT IN TERMS OF THE LOCAL CHARACTER.Would development of the site avoid significant loss of landscape-scale land identified as being of existing or potential value for the strategic green network?Partially – The site may be considered of value for the strategic green network, due to lying adjacent to an area identified as a green network opportunity related to Ratho and the Union Canal.COMMENT: THE RANSFIELD FARM SITE IS A FIELD SURROUNDED BY SOME TREES AND HEDGES. WE ARE NOT AWARE OF ANY EXISTING OR PROPOSED GREEN NETWORK WITHIN IT. HOWEVER, HOUSING DEVELOPMENT OF THE SITE WILL ALLOW FOR THE RETENTION OF EXISTING TREES AND HEDGES AND THE CREATION OF LINKS TO THE GREEN NETWORK. STEWART MILNE'S PROPOSALS SUBMITTED UNDER Q12C, SHOW THE PROVISION OF A NEW FOOTBRIDGE ACROSS THE UNION CANAL, PROVIDING IMPROVED ACCESS TO THE TOWPATH FROM RESIDENTIAL DEVELOPMENT TO THE SOUTH OF THE CANAL, THEREBY IMPROVING ACCESSIBILITY TO THE GREEN NETWORK.Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?Yes – The site has no SEPA-identified areas of medium-high flood risk/for flood management.COMMENT: AGREEDIs the site suitable for development?The site is not suitable for development due to its poor accessibility and community infrastructure capacity.COMMENT: WE DISAGREE WITH THIS CONCLUSION. AS EXPLAINED ABOVE, THE RANSFIELD FARM SITE MEETS THE COUNCIL'S ACCESSIBILITY CRITERIA AND IS WITHIN THE THRESHOLDS OF INFRASTRUCTURE CAPACITY.

Choice 12 C

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

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 12 C

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

Short Response

Explanation

Choice 12 C

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

Short Response

Explanation

Choice 12 D

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

Short Response

Explanation

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

Supporting Info   
Email

Choice **13 A**

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

Short Response

Explanation

Choice **14 A**

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

Short Response

Explanation

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

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

Supporting Info   
Email

Choice 14 C

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

Short Response

Explanation

Choice 15 A

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

Short Response

Explanation

Choice 15 B

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

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 15 C

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

Short Response

Explanation

Choice 15 D

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

Short Response

Explanation

Choice 15 E

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

Short Response

Explanation



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

Supporting Info   
Email

Choice 15 G

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

Short Response

Explanation

Choice 16 A1

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

Short Response

Explanation

Choice 16 A2

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

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **16 A3**

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

Short Response

Explanation

Choice **16 A4**

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

Short Response

Explanation

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

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

Supporting Info   
Email

Choice 16 A5

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

Short Response

Explanation

Choice 16 B

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

Short Response

Explanation

Choice 16 C

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

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 E1

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

Short Response

Explanation

Choice 16 E2

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

Short Response

Explanation

Choice 16 E3

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

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 16 E4

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

Short Response

Explanation

Choice 16 E5

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

Short Response

Explanation

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

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

Supporting Info   
Email

Choice 16 E7

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

Short Response

Explanation

Choice 16 E8

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

Short Response

Explanation

Choice 16 EX

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

Short Response

Explanation

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

Supporting Info   
Email

Choice 16 F

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

Short Response

Explanation

Choice 16 G

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

Short Response

Explanation

Choice 16 H

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

Short Response

Explanation

**Customer Ref:**

01713

**Response Ref:**

ANON-KU2U-GT2P-4

**Supporting Info**

Yes

**Name**

Holder Planning

**Email**

robin@holderplanning.co.uk

**Response Type**

Agent / Consultant

**On behalf of:**

Stewart Milne Homes

---



# Ransfield Farm, Ratho

Representation to the CityPlan 2030

## Barton Willmore

68-70 George Street | Edinburgh | EH2 2LR  
T: 0131 220 7777

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# Executive Summary

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This vision document has been prepared by Barton Willmore on behalf of Stewart Milne Homes to support the promotion of land at Ransfield Farm, Ratho (the Site) for residential development to the emerging Edinburgh City Plan 2030.

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The Site comprises of two parcels of land bisected by a road (Ratho Park Gardens) to the south. The Site represents a sustainable solution to deliver new family and affordable homes, contributing to the future housing requirements and growth of Ratho.

The Site lies to the east of Ratho and is contained by the Union Canal to the north, Ratho Park Golf Course to the east, existing residential development to the west and agricultural fields to the south - the proposed development constitutes a logical urban extension to Ratho.

The Sites edge of settlement position has been sensitively addressed with a landscape-led masterplan which responds to the landform and landscape. The proposed development seeks to deliver a well integrated and high quality residential neighbourhood that safeguards views towards the Pentland Hills and Dalmahoy Hill from within the Site, but crucially, also from the Canal towpath to the north.

The purpose of this document is to provide an assessment of the Site identifying its potential for development, together with a capacity assessment setting out the number of homes that could be brought forward. An illustrative masterplan and supporting design principles has also been prepared setting out the Stewart Milne design rationale for the Site. In undertaking this assessment, the report demonstrates that the Site has the capacity to accommodate approximately 85 homes alongside approved pedestrian and cycle links and public open spaces.

The Site is part of a larger landholding controlled by Stewart Milne, and this wider area is delineated by the blue line in Figure 1. Although this submission focusses on the land shown within the red line boundary, the wider area is available for a larger scale residential development should the Council consider that to be appropriate. At this stage Stewart Milne has not prepared a masterplan for this area, but would be willing to do so if required. We are content that the area is free of development constraints and could be developed in a manner which integrates well into the landscape and can be supported by appropriate infrastructure.





**Figure 1:** Site Location Plan

# Vision

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Stewart Milne's vision for the Site is to create a well-integrated and high-quality residential development that maximises landscape connectivity and creates new pedestrian routes linking the development with Ratho. The development will activate the Union Canal along its southern edge and provide a sensitive and robust settlement edge to Ratho.

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This will be achieved by the following:

- Provide **high-quality open space** with the **opportunity to provide moorings** along the canal edge and **footbridge**;
- **Retain view corridors** from the towpath and within the Site;
- **Incorporate existing landscape features** and enhance these, wherever possible;
- Provide a **robust settlement edge** that offers a **sense of arrival** upon entering Ratho from the east along the Canal towpath;
- Provide **high-quality market and affordable homes** of varying sizes and densities to meet local housing needs;
- Create an attractive and high quality residential neighbourhood which **responds positively to its landscape context and canal side location**;
- Deliver imaginatively designed homes with gardens which have access to a range of amenities including **children's play spaces and landscaped areas**;
- Provide a **net ecological benefit and habitat improvement**;
- Deliver a **well-connected new community** which benefits from new infrastructure to the east of Ratho; and,
- Opportunity to **bridge the Union Canal, extending the path network** and providing safe and pleasant routes for pedestrians and cyclists.



Union Canal at Lnlithgow



Stewart Milne Housetypes



Stewart Milne Housetypes



Stewart Milne Housetypes

# Planning Context

This submission is proposing that land at Ransfield Farm, Ratho is allocated in the forthcoming CityPlan 2030 for a residential development designed as a new settlement edge for Ratho. The principal context for this proposal is the Second Strategic Development Plan for South East Scotland (SESplan 2).

Key to the development of the Illustrative Masterplan has been to take account of SESplan 2's focus on placemaking principles, as follows.

## DISTINCTIVE

- Areas important for maintaining the character, landscape setting and distinctive identity of existing and proposed settlements should be protected and enhanced, particularly where they are needed to avoid the coalescence of settlements.
- The contribution of the natural and historic environment to making distinctive places should be maximised.
- **Key views of the surrounding landscape should be integrated into developments to provide a sense of place and identity.** Views of the Southern Uplands, the Lammermuir Hills and the key landmarks of Edinburgh are particularly important in supporting a sense of place and making settlements distinctive.

## SAFE & PLEASANT

- Public spaces should be free from excessive traffic noise and air pollution and the needs of people should be considered before the movement of motor vehicles.
- Public spaces should be overlooked by housing, so that the people who use them feel safe, and the people who live nearby feel a sense of ownership.
- It should be easy for people to access green/open space, including **places where they can enjoy nature.**
- Developments should be located within **a network of green and blue infrastructure** that provides a pleasant outlook for the people living and working there.

## WELCOMING

- **Gateways into settlements and extensions to existing settlements** should be interesting, memorable and contribute to local distinctiveness.
- A wide range of public spaces of different types and character, accessible to all, should be provided that appeal to people of different ages and with different interests.
- Neighbourhood centres should include attractive and safe indoor and outdoor spaces where people can interact.

## ADAPTABLE

- Development should be located where a wide **range of densities, tenures and uses** can be supported to meet the changing needs of the community into the future.
- Green networks should be multi-functional. They should comprise **infrastructure that provides a range of benefits** and can be adapted and enhanced depending on the local need for growing spaces, playspaces, natural spaces, public parks, sustainable drainage and the need to adapt to climate change.



## RESOURCE EFFICIENT

- New development should be located **near existing public transport hubs**, or in locations where there are planned infrastructure projects to enable easy access to the public transport network.
- The re-use or re-development of brownfield land should be considered before new development takes place on greenfield land, including Prime Agricultural Land and other land important for food production.
- Development should be located and **orientated to maximise passive solar heating** and opportunities for solar power generation.
- Heat mapping and other approaches should be used to identify opportunities to co-locate sources of high heat demand (e.g. housing) with sustainable sources of heat supply (e.g. biomass power plants).
- Development should be located away from functional flood plains and areas of medium to high flood risk.
- Areas important for flood storage and conveying capacity should be safeguarded for a range of compatible uses such as **recreation, water quality management, flood attenuation and habitat creation**.
- Development should be designed to minimise the area of impermeable surface and incorporate **sustainable drainage systems** as appropriate.

## EASY TO MOVE AROUND

- There should be **good walking and cycling networks** close to where people live, providing safe and convenient access to local facilities and to public transport stops.
- There should be a range of public transport options that provide **easy access into Edinburgh**, strategic centres, town centres, local centres and centres of employment.
- Development should integrate with, and contribute to, **the enhancement of walking and cycling networks**.

# Site Location & Description

## SITE LOCATION

Ratho is located less than 800m south of the M8, and less than 4km west of the Edinburgh City Bypass. The closest settlements to Ratho are Ratho Station and Newbridge, located approximately 2km to the north. The Site itself is located to the east of Ratho and is in close proximity to the local services and shops on offer in the village.

The Site is contained by the Union Canal to the north, Ratho Park Golf Course to the east, existing residential development to the west and agricultural fields to the south. Ratho Park Gardens runs through the southern part of the Site, this road connects west to Ratho Main Street and east through Ratho Park Golf Course and joins Addiston Farm Road which then connects with the A71. The A71 provides the most efficient route to Edinburgh City Centre from Ratho, approximately 30 minutes drive time.

On the northern side of the Union Canal is a recreation route for pedestrians and cyclists, National Cycle Route (NCR) 754 and Core Path 15. The NCR and Core Path provide opportunities for recreation but also commuting (Edinburgh City Centre in 30-40 minutes) and vary in character along the length of the Canal, although they are typically lined by hedgerows and trees or woodland.

## SITE DESCRIPTION

The Site extends to approximately 5.57ha in size, and comprises one small agricultural field to the north of Ratho Park Gardens and a single linear strip of a larger agricultural field to the south of Ratho Park Gardens. The agricultural field to the south forms part of a larger landholding controlled by Stewart Milne, as shown on the plan opposite.

Landscape features within the Site are limited due to the intensive agricultural management of the Site. The main feature is the planting along Ratho Park Gardens, which runs along a local ridgeline and is defined by two native hedgerows with over-mature beech trees to the north of the track. Self-seeded scrub and grassland are present along the northern boundary, along the Canal ditch. The Site falls gently from south to north.

Vehicle access could be provided at several points along Ratho Park Gardens, taking advantage of natural breaks in the tree cover.



## SURROUNDING AREA

The surrounding area is characterised by existing residential development to the west/north-west, including the Cala Homes development, The Moorings. The Moorings development has integrated the Union Canal within Ratho, positively addressing the canalside and activating its edges rather than dwellings backing on to it, as was previously the case.

Housing in the area is typically 2 storey in height and comprises a range of detached and semi-detached dwellings.

Ratho Park Golf Course is located to the east of the Site, and includes extensive Ancient Woodland along its outer edges and the Category B Listed Ratho Park Stable and Steadings to the east of the Site.



 Site Identified for Promotion  
 Land Under Control of Developer

**Figure 2:** Site Location Plan

# Contextual Assessment

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The settlement of Ratho has evolved in a linear pattern along the Union Canal and has a good range of local facilities. The proposed development benefits from canalside living and good connectivity to local facilities within the village centre.

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## ACCESSIBILITY

Ransfield Farm is advantageously located to provide a natural extension to Ratho and to support sustainable travel patterns. The benefits of developing the Site for residential development, in relation to the other relevant transport planning policies, are discussed in the following sections.

The Site will be designed to place pedestrians and cyclists at the top of the hierarchy of transport modes and ensuring permeability and connectivity within the Site and to the external networks.

The key trip attractors for a residential development are local shops, schools, public transport provision and employment opportunities. SPP and PAN 75 both state a maximum walking distance of 1.6km (20 minute walk) from new development to local amenities, whilst Transport Assessment Guidance states a 30 to 40 minute cycle journey as reasonable for a local trip (approximately 8 km).

The nearest primary school to Ransfield Farm is Ratho Primary School and is located well within 1.6km (20 minute walk).

Ratho provides some employment opportunities and is also a commuter town serving Edinburgh and its surrounds. The main employment opportunities within Ratho are in the village centre, which are accessible by bicycle. Access to employment within the Edinburgh area can be achieved via the existing frequent bus service provision serving Baird Road.

Paragraph 287 of SPP identifies the criteria against which planning applications should be assessed; development of the Site meets these requirements as demonstrated below:

- Access to the walking and cycling network in the surrounding area will be provided via Ratho Park Gardens to footways along Ratho Park Road, with land set aside for a potential link over Union Canal to the Union Canal towpath;
- Although existing bus stops are located out with 400 metres of the Site, they can be accessed within a reasonable walking journey time and provide frequent onward journeys to main employment opportunities in Edinburgh City Centre;
- The traffic impacts of development at Ransfield Farm would be assessed as part of a Transport Assessment to support a future planning application; and

- A residential travel plan framework to support sustainable travel practice will be produced in support of Ransfield Farm and can be expanded upon for Ratho.

## PUBLIC TRANSPORT

### Bus Services

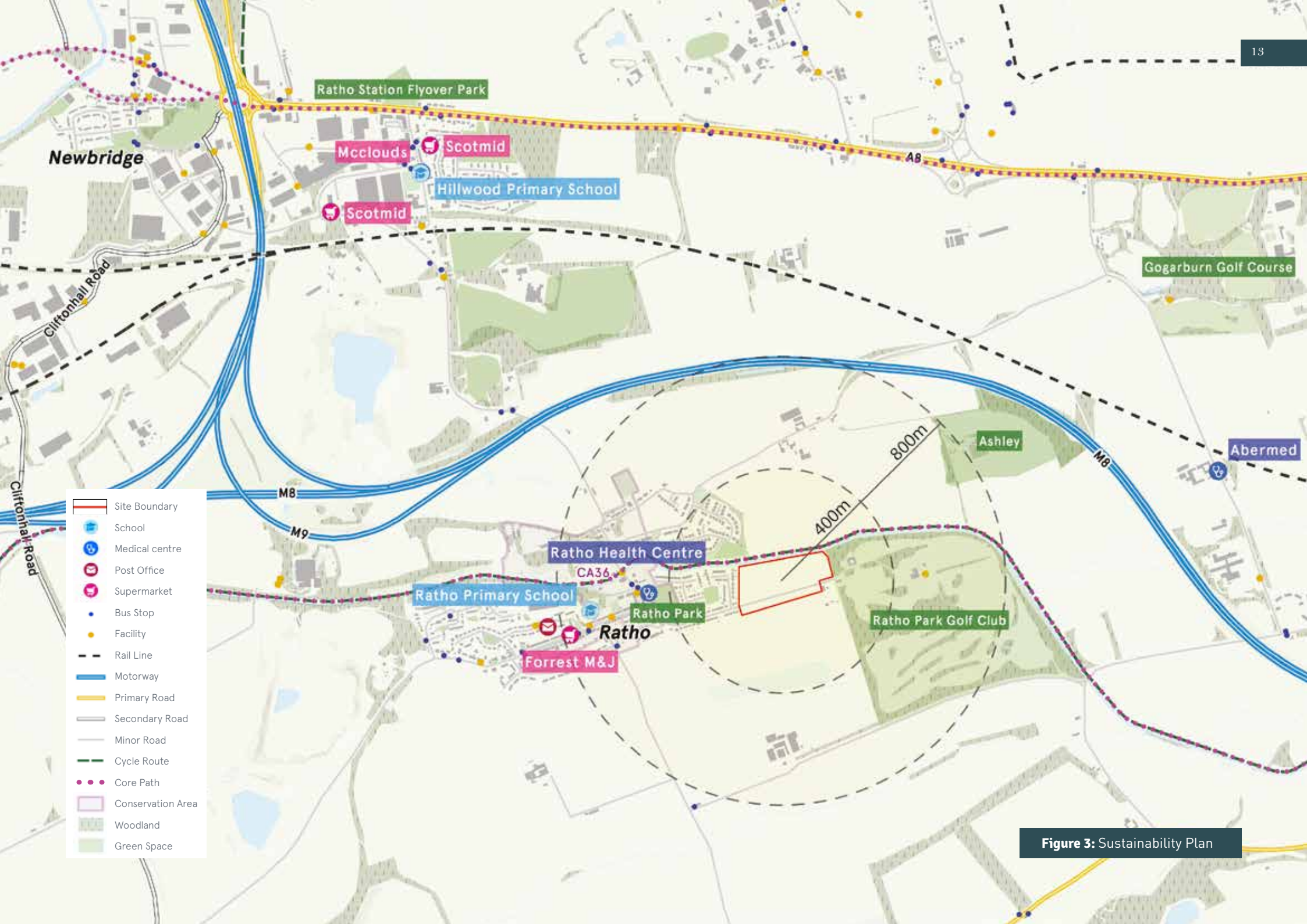
The nearest bus stops to the site are located on Baird Road, approximately 600 metres to the north-west.

The main bus operator serving Ratho is Lothian Buses, with additional services provided by E&M Horsburgh. These services offer routes to west Edinburgh, St. John's Hospital, and the Royal Infirmary of Edinburgh, whilst also providing links to other transport interchanges, such as Ingliston and Hermiston Park & Ride, where access to additional public transport services (including the tram) are available.

Lothian Bus No. 20 provides bi-hourly services on Baird Road throughout the day in both directions. The E&M Horsburgh bus service No. 40 / X40, providing additional services to St. John's Hospital and the Royal Infirmary of Edinburgh, can be accessed via bus stops on Main Street.

### Rail Services

The nearest railway station to the Site is Edinburgh Park, approximately 6.7 kilometres (approximately 20 minute cycle journey) to the east of Ratho. Edinburgh Park Station is located on the Edinburgh to Glasgow, Stirling and Dunblane rail lines.



- Site Boundary
- School
- Medical centre
- Post Office
- Supermarket
- Bus Stop
- Facility
- Rail Line
- Motorway
- Primary Road
- Secondary Road
- Minor Road
- Cycle Route
- Core Path
- Conservation Area
- Woodland
- Green Space

Figure 3: Sustainability Plan

# Site Assessment

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This section provides a summary of the findings of preliminary assessment work. Stewart Milne Homes submitted a detailed planning application for the Site in 2013, which assessed the physical aspects of the Site and its ability to accommodate development in detail. The Council and statutory consultees agreed the suitability of the Site for development in a number of respects and we include reference to this below.

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## LANDSCAPE FEATURES

Landscape features on the Site are very limited, with the most prominent structural planting located along Ratho Park Gardens on the local ridgeline through the southern part of the Site. However, the distinctive beech tree avenue is over-mature and requires maintenance and successional planting to prevent its loss in the long-term.

Self-seeded scrub and grassland are present along the northern boundary, along the Canal ditch, contributing to a slightly derelict feel to this edge of the Canal, which is typically characterised by hedgerows, mature trees and woodland.

Ancient Woodland surrounds Ratho Park Golf Course to the east of the Site, directly abutting the eastern boundary of the Site. A Local Nature Conservation Site (LNCS) stretches along the Canal and around the Golf Course, directly abutting the northern and eastern boundaries of the Site.

The Site is not subject to any landscape designations; however, it does sit within Green Belt as part of the Edinburgh Local Development Plan.

## ACCESS

Primary vehicle access to the Site can be provided via Ratho Park Gardens. There are also further opportunities to deliver pedestrian and cycle linkages to the surrounding built up area.

The Edinburgh Union Canal Strategy (2011) identifies potential to create pedestrian/cycle loops along the Canal, with aspects of the southern side of the Canal highlighted for potential walkways.

## FLOOD RISK

In 2014 SEPA advised that it had no objections to development of the site on flood risk grounds. The Council's Flooding and Drainage section has confirmed that the proposal meets the Council's requirements for flood prevention. SEPA flood maps indicate a small area of potential surface water flooding alongside the Canal to the north of the Site.

## TOPOGRAPHY AND DRAINAGE

The Site slopes gently from 78m AOD along the southern boundary, down to 73m AOD toward the Canal. Scottish Water has advised that the Marchbank Water Treatment Works has capacity to service this development. Initial investigations have indicated that Site drainage can be achieved via an appropriately designed Sustainable Urban Drainage System.

## ARCHAEOLOGY AND HERITAGE

The Union Canal abuts the northern boundary of the Site and is a registered Scheduled Monument - this includes the entire stretch of water together with the banks on either side, the towpath running along the northern side, and all distance markers and kicking stones.

There are no Listed Buildings on the Site, however, the Category B Listed Ratho Park Stable and Steading are located approximately 100m east of the Site. Existing planting provides screening between the building and the Site.

In considering the planning application in 2014, the Council and Historic Scotland agreed that the development would have no harmful impact on the Canal as an historic monument.

## ECOLOGY

Stewart Milne has undertaken an ecological assessment and tree survey in 2013 which found that of bats and badgers will not be adversely affected by the development. Although there is no evidence that otters or water voles use the land, it is likely that they will use the canal and canal-side. Habitat protection and enhancement would therefore be carried out.

## UTILITIES & INFRASTRUCTURE

All supporting infrastructure such as gas, electricity, broadband and water are within the direct vicinity of the Site and are easily accessible. Overall, there are no utilities or infrastructure constraints that would prevent the development of the Site.

## NEIGHBOURING RESIDENTIAL DEVELOPMENT

Neighbouring dwellings to the west, primarily have a rear facing aspect with back garden fencing and scrub planting forming a boundary to the Site.



Freeland Road

Union Canal

Ratho Park Gardens

Ratho Park Road

Ratho Park Golf Course

- Site Boundary
  - Trees
  - Ancient Woodland
  - Hedgerow
  - Watercourse/Ponds
  - Surface Water Flood Risk
  - Bus Stops
  - National Cycle Route 754
  - Core Path
  - Potential Access
  - Scheduled Monument
  - Listed Building/Structure
  - Local Nature Conservation Site\*
  - Conservation Area\*
- \* source: Edinburgh Local Development Plan

Figure 4: Site Assessment Plan

# Landscape & Visual Appraisal

**A Landscape and Visual Appraisal has been undertaken to assess the development capacity of the Site. Site visits were undertaken in December 2018, which provided a worst-case scenario for visibility as the vegetation was bare and afforded reduced screening. The full report which accompanies this submission has been summarised below:**

## SITE CONTEXT

The Site is closely associated with the settlement of Ratho. Ratho is a linear settlement that extends along the Union Canal, and up onto the Ratho Hills to the west.

Key landscape features and receptors are the Union Canal and users of the Canal and towpath, listed buildings and the designed landscape (not inventory listed) including Ancient Woodland of Ratho Park Golf Course and residents adjacent to and opposite the Site.

The landscape to the north is increasingly urban and influenced by the M8 and railway corridors. The landscape to south is more rural in character, particularly away from the edge of Edinburgh.

## TOPOGRAPHICAL FEATURES

Ratho Hills contain the Site and Ratho to the west, and the undulating landform creates a series of local ridgelines to the south, including the 79m AOD local ridgeline that runs through the southern part of the Site, rising up towards Dalmahoy Hill to the south-west and the Pentland Hills beyond. To the north, the landform generally falls towards the Forth of Firth, with local undulations, hills and valleys. To the west, the Ratho Hills provide containment, rising up to 147m AOD at Tormain Hill.

## ZONE OF THEORETICAL VISIBILITY MAPPING

A suite of Zone of Theoretical Visibility (ZTV) mapping has been prepared which illustrates the visibility of the Site as a whole and the Proposed Development based on an assumed development height of 10m above ground level. The height of 10m AGL allows for the height of a two storey house plus the creation of development platforms. The ZTV mapping of the Site as a whole assumes development across the full extent of the Site to demonstrate a worst-case scenario.

The ZTV mapping illustrates the theoretical visibility of the developed Site on a bare earth base and with barriers, which includes existing woodland blocks and buildings derived from OS data, making general height assumptions of 10m for woodlands and 8.5m for existing buildings.

A second ZTV was prepared illustrating the theoretical visibility of the existing settlement of Ratho, based on a height of 8.5m for existing buildings, and demonstrates that the visual envelope of the Site and Proposed Development are entirely contained within the existing visual envelope of Ratho.

The ZTV illustrates that the visibility of the Site is significantly contained as a result of the surrounding landform, intervening layers of vegetation and existing built form, with views predominantly limited to near distance views, where the Site is seen in the context of the settlement of Ratho. Long distance views are afforded to the north-east, with views as far as the Lomond Hills in the distance. From the south, despite its elevation, the Site is seen against the backdrop of the layers of distant hills beyond; the tree belt being a distinctive feature although in a state of decline.



The visibility of the site is limited and sits entirely within the visual envelope of the existing settlement of Ratho

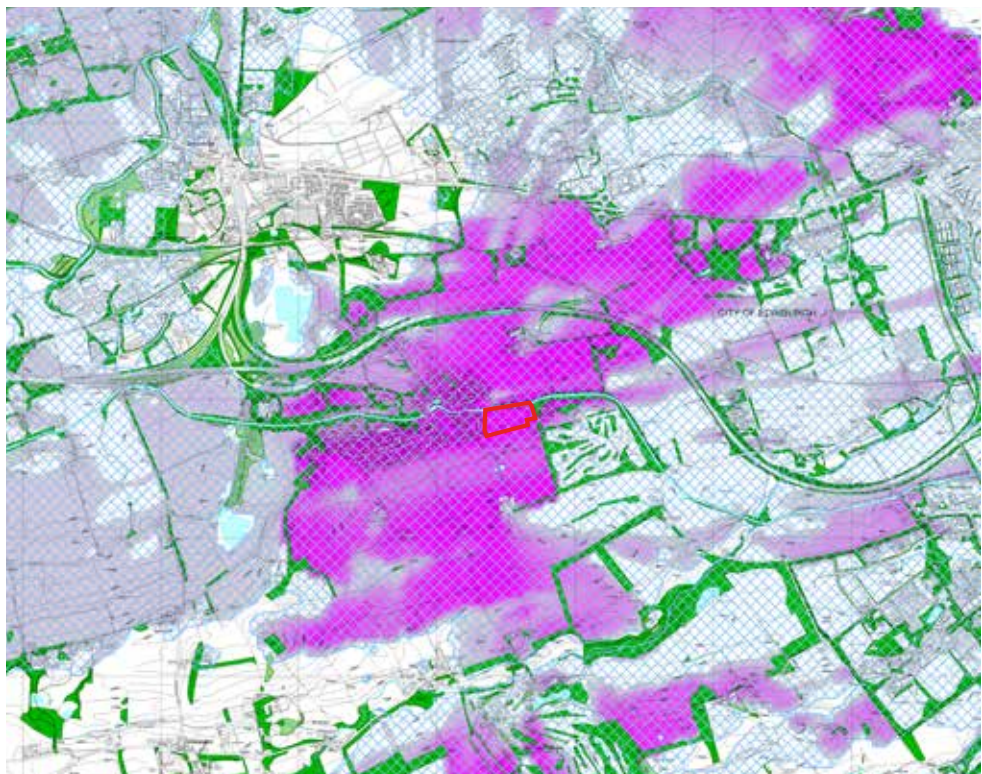


Figure 5: ZTV of Ratho



Figure 6: ZTV of Proposed Site (full extents)



## SEQUENTIAL VIEWS

A series of sequential views, both leaving and coming toward Ratho along the Canal towpath adjacent to the Sites northern boundary have been assessed.

Sequential views along the Canal towards Ratho are:

- Typically focussed along the route, channelled by the trees.
- To the south, the golf course introduces a recreational and urban fringe character to the Canal, where visible through the mature woodland.

- To the north, transient views are afforded across strongly undulating agricultural fields and out across Edinburgh and towards the distant Lomond Hills.
- Views of Ratho rising up onto the hills are seen before the Site is visible.
- The large scale Ratho Park stables are perceived through the trees before the Site and edge of Ratho is revealed, together with filtered views of residential properties at The Moorings.

- Views into the Site are more open due to the self-seeded vegetation along the Canal, in contrast with the more established woodland and tree belts to the east.
- The Site forms a simple field that rises up to a local ridgeline and encloses views to the south, emphasised by the mature tree belt along Ratho Park Gardens, albeit glimpses of the top of the Pentlands and Dalmahoy Hill are seen through the ridgeline tree belt.



Figure 7: Initial view into Site



Figure 8: Photo Location Points



Figure 9: Sequential Views along the Canal - towards Ratho

Sequential views along the Canal leaving Ratho comprise:

- Two storey houses backing on to the Canal, with occasional trees filtering views of back garden fences.
  - Open views across the Site are enclosed by the woodland around the golf course and the local ridgeline to the south of the Site.
  - Open long-distance views extend across the lower-lying and strongly undulating agricultural fields to the north of the Canal edge.
  - Built form, including residential properties are visible to the west as well as the east and south-east of the Site and extend the urban fringe character on the edge of Ratho.
  - Views south are enclosed in nature, by the ridgeline, housing and the golf course, with views north influenced by the designed landscape of Ratho Hall and gradually becoming more open in nature, with set backs to the Marina and housing at The Moorings, and extensive, long distance views across the lower-lying land to the north where views through the canalside vegetation allow.
- Transient views of the Pentland Hills are limited to the tops of the Pentland range, seen beyond the hedgerow and tree line within the Site and the woodland around the golf course. Whilst views are more open in the winter months, visibility of the Pentland Hills is subject to greater fluctuations in weather conditions. During the summer, when users of the tow path will be greater, and visibility is likely to be clearer, the hedgerow and trees will further truncate views and reduce the extent of views towards the Pentland Hills.

## VISUAL RECEPTORS

Visual receptors likely to be affected by the introduction of development into the Site include:

- Users of the Canal towpath and waterway;
- Residents adjacent or opposite the Site on the edge of Ratho;
- Residents of Rossendale, Ratho Park Stables & Steading; Freelands, Ratho Mains and Ransfield;
- Users of the open space adjacent to the Canal and Tormain Bank; and
- Users of Dalmahoy Road, Freelands Road, Wilkieston Road and Ratho Park Gardens.



Figure 10: Photo Location Points



Ratho Park Steadings & Stable



Rossendale Pentland Hills



Rossendale Pentland Hills Dalmahoy Hill



Figure 11: Sequential Views along the Canal - leaving Ratho

Through desktop analysis and site visits, the highest and most prominent peaks relative to the Site were identified. These were all located to the south of the Site and included, The Pentland Hills (Allermuir Hill and Black Hill) and Dalmahoy Hill. These views, from chosen locations along the towpath, will directly inform design principles and masterplan structure.

#### LONG DISTANCE VIEWS

Following numerous Site visits, at different times of the day, and in different weather conditions, we were able to identify key views from the towpath running along the northern edge of the Canal looking southward across the Site.

#### Views of the Pentland Hills

The tops of the peaks around and between Allermuir Hill and Black Hill are the most prominent from the site / adjacent towpath, albeit these views are greatly affected depending on the season and weather conditions. For example, on a cloudy / dull day none of the hills are visible and views of Allermuir Hill requires a bright and clear day in the winter so that intervening tree cover, specifically around Ratho Park Golf Course, does not screen views.

Views of East Craig are screened by Dalmahoy Hill.



**Figure 12:** View Corridors

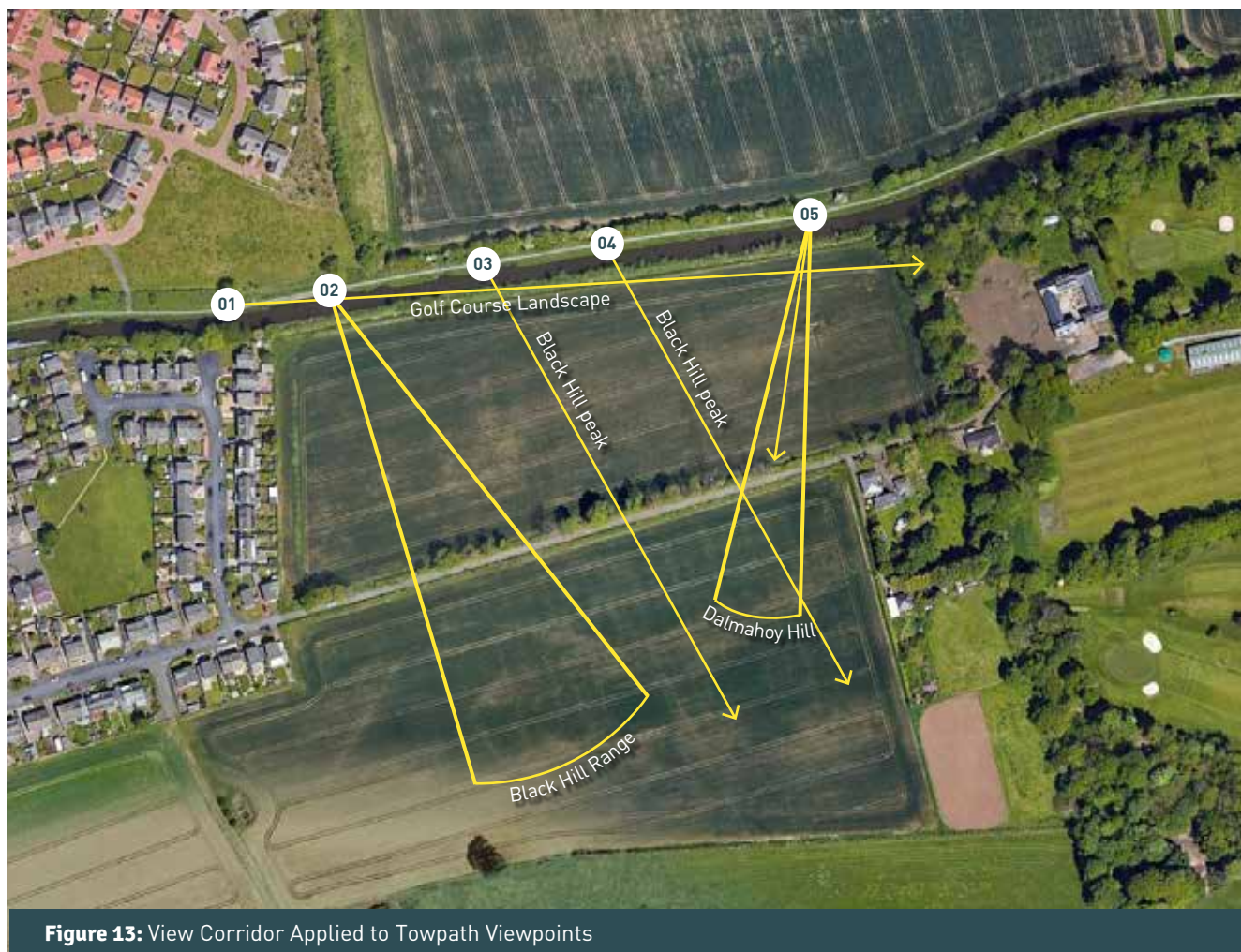
## Views of Dalmahoy Hill

Views of Dalmahoy Hill vary dependent on the location along the towpath which are generally best toward the centre of the site. However, given that the Hill lies to the South West of the site these view corridors cut across view to the Pentland Hills which lie to the south east.

## Viewpoint Locations

Viewpoints were identified along the Canal towpath toward the east, west and centrally, in line with the Site's northern boundary.

- **Viewpoint 01** was chosen because an important visual connection between Ratho and its setting is views of the landscape along the Canal and around the golf course. In fact, this view very much draws the eye upon leaving the village.
- **Viewpoint 02** was chosen as it provides a full view of the range around Black Hill close to where pedestrians / cyclists leave the village.
- **Viewpoint 03 and 04** were chosen as points where views are gained of Black Hill but also provide good locations for more simple visual connections to the local landscape and landform such as the tree lined ridge along Ratho Park Gardens.
- **Viewpoint 05** was chosen as a point of arrival into the village from the east and a point at which a partial view of Dalmahoy Hill is available, dependant on conditions, but as importantly it provides a simple local view towards the existing trees along Ratho Park Gardens.



**Figure 13:** View Corridor Applied to Towpath Viewpoints



Figure 14: View of Pentland Hills from north-west viewpoint



Figure 15: View of Pentland Hills and Dalmahoy Hill from central viewpoint

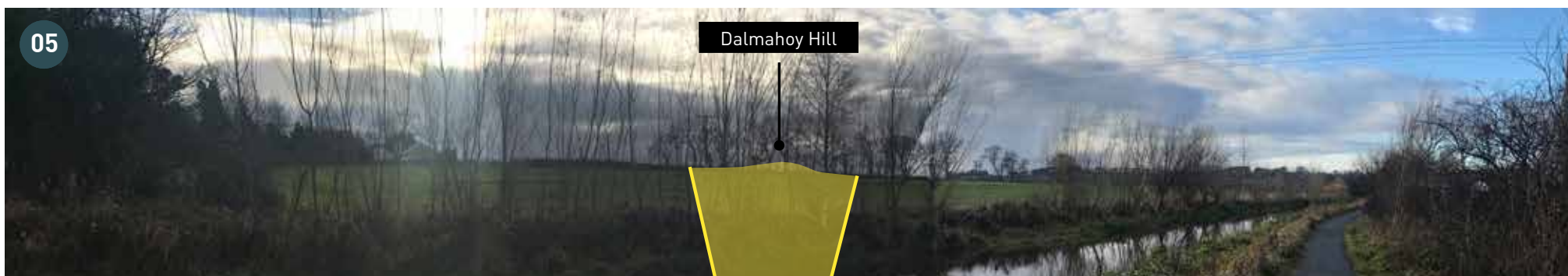
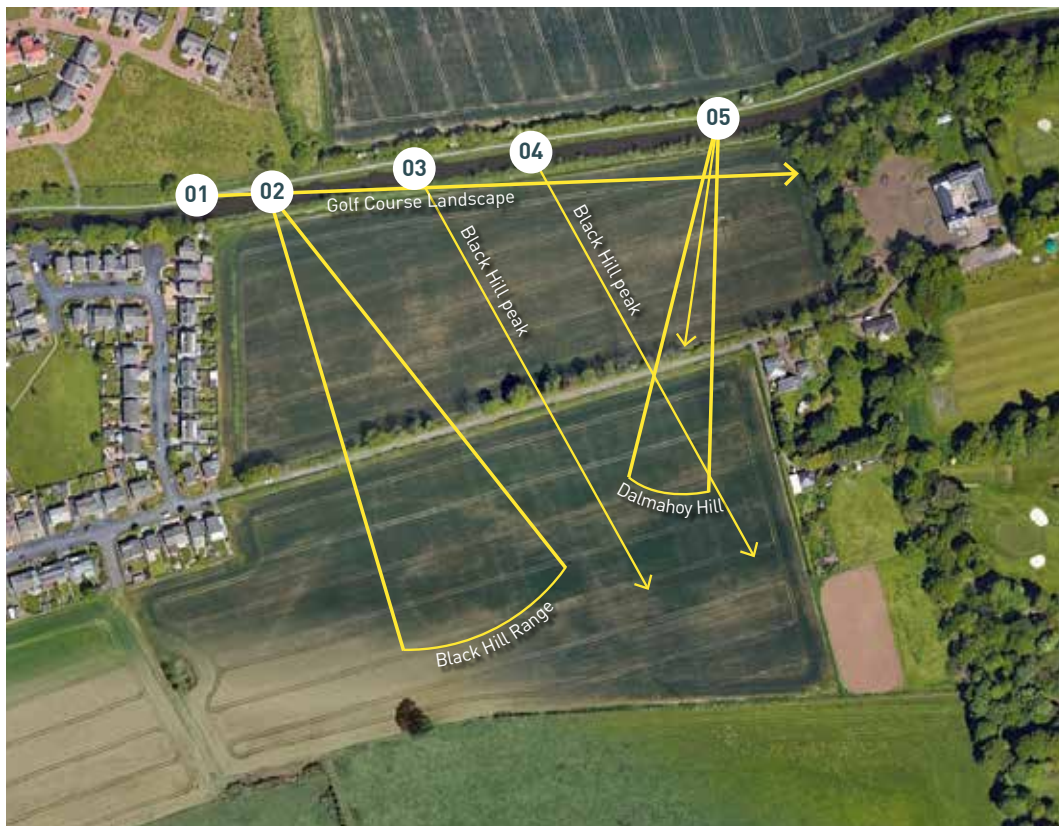


Figure 16: View of Dalmahoy Hill from north-east viewpoint





**Figure 17:** View of the trees around the Golf Course, particularly those alongside the Canal

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The view corridor structure established through the visual assessment will inform the structure of the emerging masterplan in terms of location and orientation of open spaces, streets and building lines.

The principle of this visual assessment directly informing the emerging masterplan is central to our approach, however, we would welcome further dialogue in this respect to ensure the most valued views and most appropriate viewpoints are used to structure the design response.

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# Development Concept

Through our contextual and Site assessments a number of design concepts and principles have emerged which directly respond to the Sites existing features and help set parameters through which development could be sensitively delivered.

## DEVELOPMENT STRUCTURE

### Existing Site Allows Views to the South

Currently there are a variety of views afforded across to the site looking south from the canal towpath towards the local ridgeline and trees on Ratho Park Gardens and beyond to the Pentland Hills and Dalmahoy Hill.

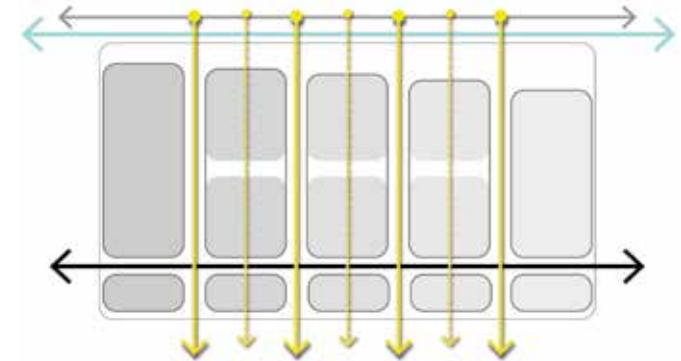
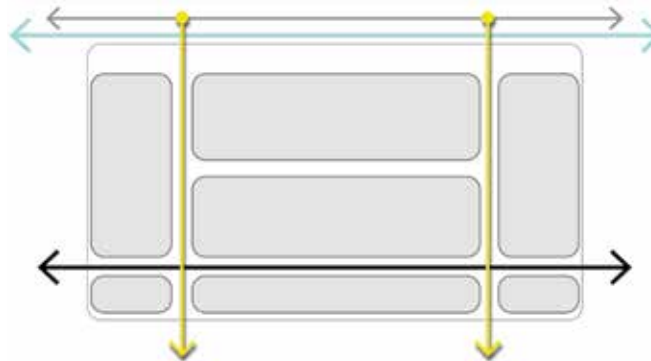
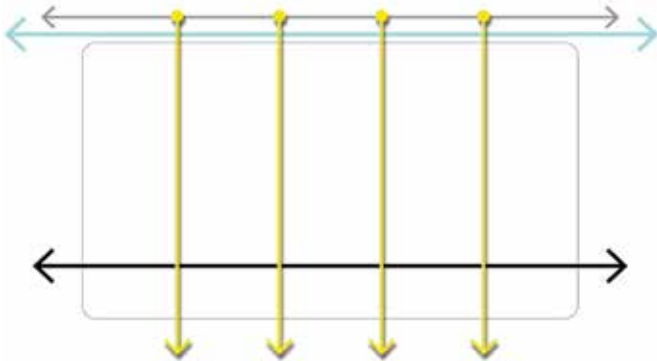


### Horizontal Block Structure

A horizontal emphasis to the block structure provides a straight forward method of frontage to the canal and Ratho Park Gardens, however, this limits the opportunity for view corridors through site given the linear nature of building forms across the site.

### Vertical / Split Block Structure

By introducing vertical blocks it provides the opportunity for additional view corridors along extra north-south streets. Furthermore, if feature gable end units are used to activate the canal edge, Ratho Park Road edge and any internal street.



density

## DEVELOPMENT PRINCIPLES & PARAMETERS

- 01 Views through green spaces but also development blocks, with houses orientated to allow views between blocks.
- 02 Scale, massing and density to decrease reduce from west to east.
- 03 Break up massing of development to allow views south towards Pentlands, Dalmaohy Hill and the local ridgeline and tree line.
- 04 Create an attractive and functional greenspace along the canal edge to provide amenity for residents of Ratho.
- 05 Deliver or facilitate canal strategy for bridge and circular route along south of canal.
- 06 Retain and positively manage existing trees.
- 07 Reinforce Ratho Park Garden tree line with successional trees to south of road.
- 08 Reinforce tree belt along western edge of Golf Course to improve screening of Listed building.

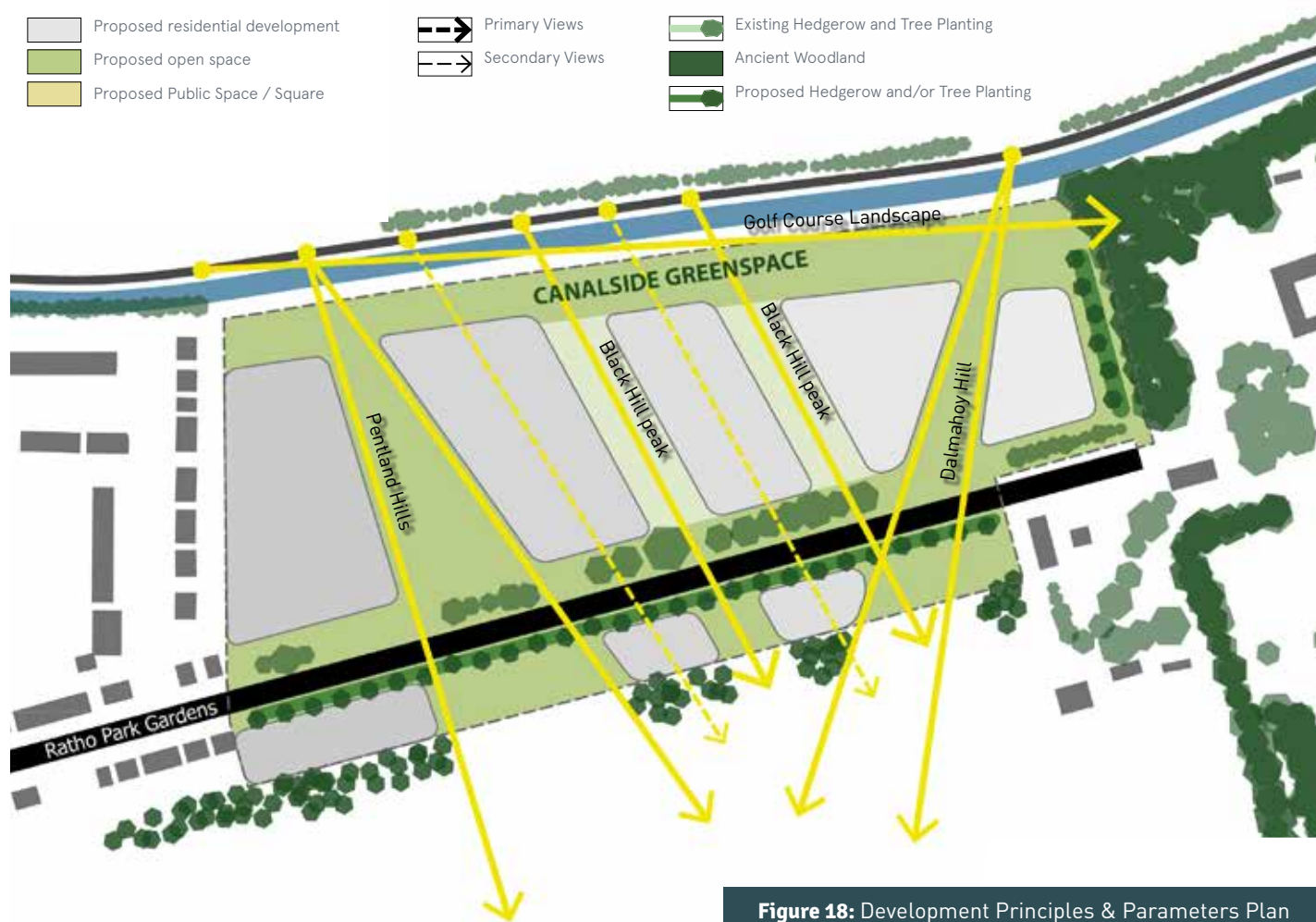


Figure 18: Development Principles & Parameters Plan

CONCEPT PLANS








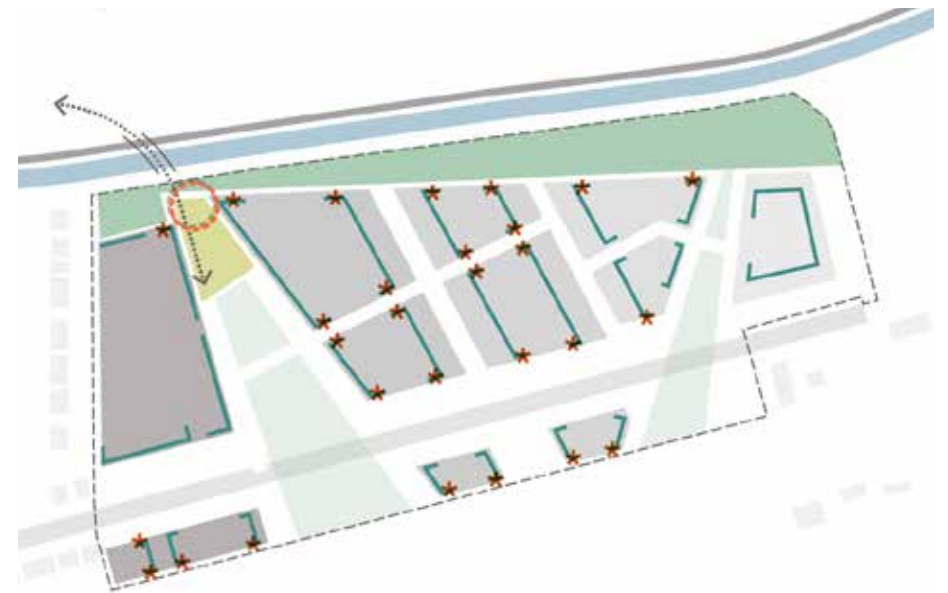
-  Vehicular Access Point
-  Primary Street
-  Secondary Street / Shared Surface
-  Private Drive / Lane
-  Proposed Bridge

Figure 19: Street Hierarchy






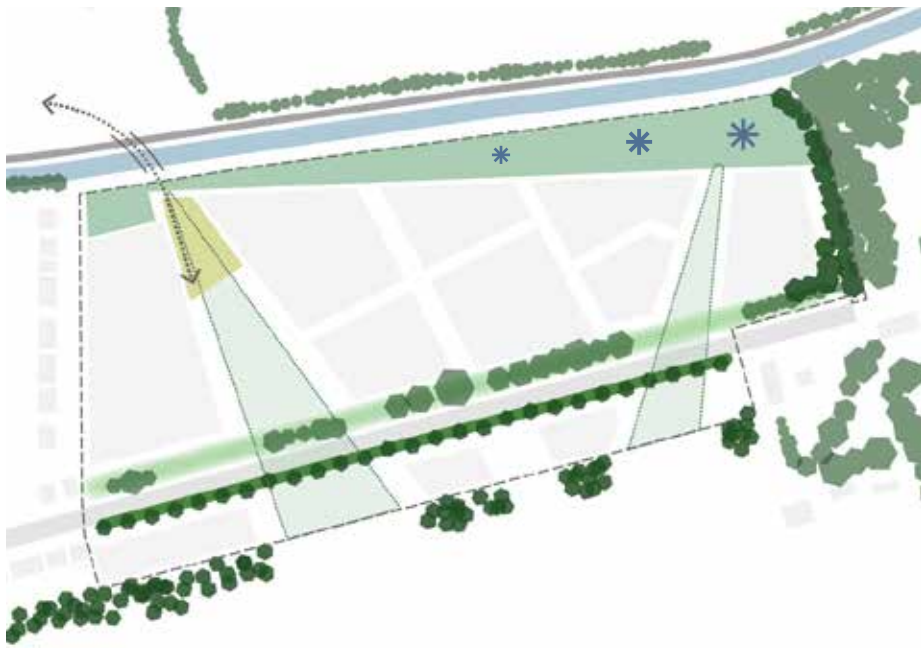
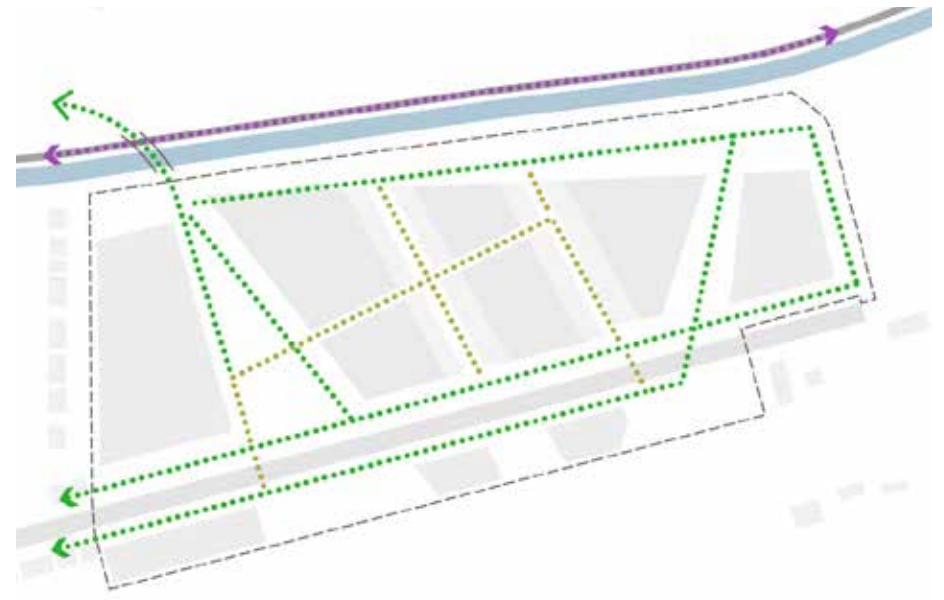
-  Gateway
-  Canalside Greenspace
-  Key Public Space
-  Green Wedge
-  Feature / Active Gable
-  Building Frontage
-  Proposed Bridge

Figure 20: Urban Form



- Existing Planting
- Key Public Space
- Canalside Greenspace
- Indicative SuDS Location
- Green Wedge
- Proposed Planting
- Proposed Bridge

Figure 21: Landscape Strategy



- Existing NCR / Core Path
- Proposed Dedicated Pedestrian / Cycle Route
- Proposed Paths Along Streets
- Proposed Bridge

Figure 22: Path Network

# Design Proposal

An Indicative Masterplan has been prepared for the Site, as shown opposite. This indicates:

- Definition of private and public spaces in response to the landscape and visual analysis;
- Means of access and circulation;
- Potential building footprints; and
- Public realm treatment including landscape and open space.

While indicative, the landscape-led masterplan has been considered at a level of detail capable of demonstrating how the design principles, formed in response to the landscape and visual analysis, could be developed into a sensitive and high-quality residential neighbourhood.

Stewart Milne Homes are keen to develop these early ideas further through the development plan process and in consultation with key stakeholders and the community.

## KEY COMPONENTS OF THE MASTERPLAN

- Positive activation of the canal and increasing its amenity value through provision of public / green spaces, paths and potentially providing moorings in the form of floating pontoons. Ultimately, any proposals for the canal side would be developed in consultation with Scottish Canals.
- Creating view corridors through the site through either the creation of open space, along streets or between buildings
- Using a range densities to respond to the adjacent built and natural environment. In respect of this, it is proposed that development densities fall from west to east.

## KEY FEATURES

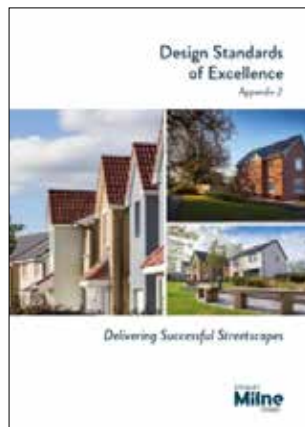
- 01 Potential to provide a footbridge over the canal, enhancing access to the towpath;
- 02 Create a public space at the landing point of the bridge as a new public space which could accommodate infrastructure for the new moorings and be a location for public art;
- 03 Deliver an informal habitat and amenity corridor along the Canal comprising suds basins as reed beds and wildflower meadow, with occasional native trees along the Canal to reflect the character of the Canal corridor within Ratho, albeit with a more open arrangement;
- 04 Break up the massing of the proposed built form to allow for visual corridors that enable views of the existing trees in the Site and beyond to the Pentlands. Visual corridors are provided as formal view corridors along open space and informal glimpsed views across parking courts and rear gardens;
  - 4a View corridors of Pentland Hills and Dalmahoy Hill
  - 4b View corridors down the streets
  - 4c Views between the backs of buildings
- 05 Create an articulated built edge to the Canal, with articulated gable ends linked by stone walls or hedgerows;
- 06 Establish successional tree planting and gap-up / replace native hedgerow to the south of Ratho Park Gardens;
- 07 Establish a woodland buffer adjacent to the ancient woodland to enhance the habitat edge of the existing woodland and enhance screening of Ratho Park Stables and Steading;
- 08 Deliver amenity space including informal lawn, street trees and an equipped play area with frontages for overlooking and passive surveillance;
- 09 Potential to create a boardwalk and moorings along the southern edge of the Canal, enabling future access provision along the southern edge of the Canal in line with the Canal Strategy and to enhance Green Infrastructure provision in Ratho and along the Canal;
- 10 Reduce the massing and layout of the Proposed Development from west to east across the Site, through the use of less formal layout arrangements and changes in scale, height and / or density; and
- 11 Establish tree planting around the proposed houses to the south of Ratho Park Gardens to create a treed setting for the properties in keeping with a farmstead arrangement.



Figure 23: Indicative Masterplan

# Stewart Milne Housing Design Standards

**The Design Standards of Excellence Manual** has been developed to assist the divisions create great places that leave a positive and lasting legacy of well designed residential neighbourhoods. By focussing on the design and layout, the spaces created between buildings, as well as understanding how the buildings related to these spaces and to each other, we significantly capture and raise the quality of development.



**Delivering Successful Landscapes** has been introduced in recognition of benefits of landscape led design. Quality landscape does not automatically mean higher costs. By focussing on landscape design, specification and delivery, significant design improvements can be made. Semi-mature planting has become a core part of our landscaping design strategy which delivers landscape impact from the outset of the development, clever contouring of land and ensuring planting both complements the architecture and is indigenous, provides both sense of arrival and creates habitats that are natural to the Scottish landscape.

**Delivering Successful Streetscapes** aims to provide guidance and the tools required to realise the full potential of our Woodlands Range and the variation of styles available within it. We aspire to create individual, well designed communities which are sympathetically integrated into their surroundings. In doing so, we aim to set ourselves aside from our competitors and ensure a holistic approach to new build housing. Ultimately, we aspire to create communities and places that people are proud to call their home.

This is set out in the forward of the guide, written by **Karen Anderson - Chair of Architecture and Design Scotland (A&DS):**

The quality of our homes and the outdoor spaces we share with our neighbours is a vital part of our sense of wellbeing. Good quality new housing can enhance our day to day lives and, with good urban design, new development can help build stronger, more connected communities. Housing provides the building blocks of our places and communities.

We welcome Stewart Milne Homes' ambition, as set out in this guide, to tailor each of their developments to respect and build on the unique character of their locations so that the people living in them enjoy not just high quality homes, but better quality settings, streets and greenspace.

This guide provides an undertaking that Stewart Milne Homes will:

- not build 'could be anywhere' housing, but will learn from what works well in an area. They will provide truly bespoke developments responding to local built and landscape forms and climate.
- design new homes and spaces of character and quality providing paths, streets and landscape structures that connect people to each other, to the rest of the community and the wider landscape.
- use building materials and planting for developments that respond to local built and natural characteristics.
- ensure their developments have a mix of house sizes and types to help build more balanced and sustainable neighbourhoods.

We support this approach. We believe it will benefit not only those who chose to live in Stewart Milne Homes but, importantly, is a way of developing that recognises that when we build homes for the future there are key opportunities to create new places of quality.

**Karen Anderson**  
Chair, Architecture and Design Scotland (A&DS)

Architecture and Design Scotland's vision is that we live in a Scotland where a well-designed built environment supports sustainable, resilient communities which meets the needs of all. We work to ensure that more people in Scotland are involved in decisions that affect their places, benefit from well-designed buildings, places and spaces and see how good design adds value to their lives. [www.ads.org.uk](http://www.ads.org.uk)



## A STRONG SENSE OF PLACE

At Stewart Milne Homes, we ensure that our developments are absolutely connected to the surrounding context; using materials, landscape and layout designs which create real character. We recognise the core business benefits of utilising a standard product housing range; those being commercially controllable yet with the ability to build to a five star quality.

## HOW WE ADD VALUE

- Creating a 'sense of arrival' – Kerb Appeal
- Completing village greens and landscaping early in the development to ensure an immediate sense of community and space
- Bringing personality and passion into streetscapes and homes designs
- Every site feels unique
- Every plot feels individual



"We can all identify a town or village that we believe to be beautiful; a place that we love to visit, that gives us delight or makes us feel secure and content. Often these places are hundreds of years old and recognised through heritage or listed status. At Stewart Milne Homes we aim to create new places that have the very same qualities. Places you're proud to come home to, invite friends to and establish a footing within a vibrant community".

Stuart Henderson – Design Director



# Conclusion

The proposed development at Ransfield Farm, Ratho, forms a logical settlement extension and provides the opportunity to activate a section of the Union Canal through the provision of amenity space, active frontages as well as potentially delivering moorings / boardwalk and a new pedestrian / cycle footbridge connecting the site to the canal tow path on its northern bank. It is envisaged that the boardwalk could eventually link west and onto existing moorings and ultimately connect to the village centre.

Central to the evolution of these early design ideas / proposals is the principle of providing an attractive settlement edge that reduces in massing, scale and density from west to east. The reduction in massing provides an articulated edge that allows for views along and through the site, with views towards the Ratho Park Gardens tree line and the Pentland Hills and Dalmahoy Hill which insures that users of the canal tow path retain a visual link with the wider landscape.

These view corridors are achieved through public open spaces and streets as the proposed urban structure orientates streets broadly north-south rather than east-west with gable ends activating the canalside / green space.

A wide range of landscape principles are established to ensure that the proposed development layout and design comes forward in accordance with the landscape and visual appraisal in order to enhance local landscape features, deliver green network improvements and enable the residential development to be assimilated into the local landscape context and setting.



