

Customer Ref: 01439 Response Ref: ANON-KU2U-GWHX-5
Name: Steven Cooper
Response Type: Developer / Landowner
On behalf of: CALA Management Ltd

Supporting Info:
Email: scooper@cala.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: No

Explanation We support the promotion of a city-wide, regional, and national green network in principle. However, the purpose of all areas identified as Green Network on Map 1 – A connected, green Edinburgh is not clear. These green areas represent the Edinburgh Green Belt. The parameters and the scope of the Green Network is yet to be defined and consulted upon by the Lothians & Fife Green Network Partnership, part of the Central Scotland Green Network. Ongoing compliance with these objectives can be achieved through the allocation of new greenfield housing sites to provide opportunities to extend the existing green corridors or active travel routes into the wider area. Open Space 2021 remains the Council's adopted Open Space Strategy. Open Space 2021 requires to be updated in order to reflect the new Open Space Strategy proposed in the emerging City Plan 2030. We would also note that any planning obligations sought towards delivery of the Green Network are in accord with the statutory provisions of Section 75 of the 1997 Act (referring to the Elsieck case law) in addition to the tests set out in Circular 3/2012.

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Choice 1 B

We want to change our policy to require all development (including change of use) to include green and blue infrastructure. Do you agree with this? - Support / Object

Short Response

Explanation We support the principle of the provision of appropriate green and blue infrastructure in all new development, subject to further detail of the emerging policy requirements. The Choices paper defines this as "trees, living roofs, and nature-based drainage solutions including, ponds, swales, rain gardens and ecosystem services as well as making best use of natural features in the surrounding environment". This will require a new or updated policy framework in the emerging City Plan 2030. Compliance with these new requirements may prove challenging for brownfield developments. Brownfield sites, including change of use and regeneration, may be unable to meet any updated green and blue infrastructure set out in new policy requirements because of site constraints or existing infrastructure constraints. New greenfield housing development can provide new landscape planting and other green and blue infrastructure along water courses, and urban edge. This green and blue infrastructure will need to be managed through an appropriate policy framework. Policy should not be overly specific on what is required. There needs to be flexibility as each site is different and what is appropriate on one, is not necessarily appropriate on all.

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 In principle, identification of areas to be used for future water management can be supported. However, those areas will require to be identified through an appropriate water management strategy for the City. There are no supporting documents that identify a proposed water management strategy for the City. Therefore it is not possible to provide a more detailed response at this stage. Ideally, such a document should be available for public consultation prior to becoming a part of the City Plan 2030. A draft water management strategy for the City will require prior consultation with Scottish Water (surface water management) and SEPA (flood risk attenuation) before inclusion in the emerging City Plan 2030.

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Choice **1 D**

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

Short Response

Explanation

Choice **1 E**

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

Short Response

Explanation There is insufficient information or evidence available in the Choices for City Plan document and supporting information to be able to provide a full response. There is no explanation as to why 5 hectares has been selected, and to how large a population each 5 hectare space should relate. There is no distinction between greenfield and brownfield areas, and it would appear more difficult to provide new 5ha spaces in brownfield areas than greenfield given the relative availability of land. To assist in this process, an update to the Open Space Audit 2016 by the Council is necessary to demonstrate the up to date availability and condition of existing green / open spaces within the City. This evidence base is required to develop either the strategy to deliver more large green spaces over 5 ha or develop development briefs for Greenfield sites to deliver this policy requirement. This requirement will also significantly impact on Brownfield sites. Without this evidence, or justification, we therefore cannot support the new 'extra-large green space standard' which recognises the need for communities to access green spaces of more than 5 hectares. Further clarification is required as to whether the Council's proposed requirement is for access to multiple green / open spaces amounting to 5 ha within an appropriate walking distance or for a whole 5 ha green / open space as part of the development brief for both Greenfield and Brownfield sites to be allocated for new development.

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Choice 1 F

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

Short Response

Explanation

Choice 1 F

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

Short Response

Explanation

Choice 1 G

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

Short Response

Explanation

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Choice 1 H

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

Short Response: Not Answered

Explanation All new greenspace provided in new developments is factored to provide proper management and maintenance in perpetuity. This is delivered through requirements set out in the Deed of Conditions for the incoming house owners and tenants. Therefore there is no objection to this. The question is unclear in that it also refers to existing green space designations. It is not clear if the Council is proposing that maintenance of existing green space designations should also be subject to private factoring arrangements. It is considered that this is not the intention of the revision to existing policy and the Council does not expect that new development will be required to take on the factoring of existing green spaces nearby. This would not be supported.

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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 We support the principle that development should 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". It is noted that these principles are set out in Part 1 Section 2 A Plan to Protect and Enhance the Environment of the adopted LDP which continue to remain valid for City Plan 2030. A refresh of Figure 2 Current national and city sustainability targets will be required for City Plan 2030. Part 2 Section 2 Design Principles for New Development of the adopted LDP already provides a policy framework in accord with the statutory requirements of the approved SESplan SDP. Further, the Edinburgh Design Guidance (November 2018) sets out the clear requirements for new development as well as the provision of Design and Access Statements which are expected for all major planning applications as well as complex or significant local planning applications. The requirement for Design and Access Statement should continue to reflect this Council approved document. City Plan 2030 should therefore continue to adopt the existing policy framework set out in the adopted LDP which has regard to development quality, site layouts, public realm and landscape as well as the policy framework on open spaces and private spaces. This should build upon the policy framework set out in the Edinburgh Design Guidance (November 2018). We welcome Council feedback on the information already being provided in response to the existing policy framework to identify the need for further information or clarity on what is already being provided.

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Choice 2 B

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

Short Response: No

Explanation

We support the aspiration to make best use of the limited space in our City and that sites are not under-developed. We also acknowledge that City Plan 2030 needs to provide for and maximise the benefits of being close to public transport services and active travel routes. However, a policy setting minimum densities is not an appropriate strategy and would be in conflict with the approved SESplan SDP as well as national policy. The approved SESplan SDP identifies that City Plan 2030 should ensure protection for the character of existing settlements, should not undermine green belt objectives and should avoid diverting investment in infrastructure from other priorities. Scottish Planning Policy (SPP) is clear that planning should direct development to the right place. This requires spatial strategies within development plans to promote a sustainable pattern of development appropriate to the area. We understand that City Plan 2030 is seeking to revise its density policy as follows: • All housing development to achieve a minimum density of at least 65 dwelling per hectare (gross); • Housing development in identified areas to achieve a minimum density of 100 dwelling per hectare (gross); and • Vertical mix of undefined uses to support the efficient use of land. We understand that the identified minimum density of at least 65 dwelling per hectare (gross) is explained in the Housing Study (January 2020). This states that: The density of current and recent housing sites in Edinburgh is presented in the Monitoring Statement and Appendix 1 of Part 2a to this study provides examples of recent Edinburgh developments and applications. The average density of development over the last 10 years was 65 dwellings per hectare. Neither the Monitoring Statement nor the Housing Study Appendix 1 Density Examples present any evidence to support the conclusion that all housing development in the Study achieved a minimum density of at least 65 dwelling per hectare (gross). There is also no evidence support for a minimum density of 100 dwelling per hectare (gross) in identified areas. Density should not be measured on the basis of gross site area. Instead, it should be reflective of the developable area of the site. The updated iteration of Edinburgh Design Guidance (January 2020), which has not been subject to public consultation, states: "In order to ensure a consistent approach across the city, built density will be measured as follows: The density of dwellings per hectare is calculated by dividing the number of dwellings on site by the Development Site + Roads Area. Development Site + Roads Area (Ha) – is measured to middle of roads or other routes bounding the site." We understand that the figure of 65 dwelling per hectare (gross) has been derived by an assessment of the average density of all housing development across Edinburgh, built over the period from 2008 to 2018 based simply on number of dwellings built divided by the gross site area. This assessment included the following development types: • Brownfield; • Change of use; • Infill – cleared site; • Infill – garden; • Infill – other; • Greenfield – agricultural; • Greenfield – open space; • Greenfield – other; and • Infill – open space. It is also noted that the assessed dwellings built from sites range from a capacity of between 5 homes to 983 homes. Although this is assessment is comprehensive, it fundamentally does not take into account the policy requirements of development plan and national guidance. We consider that this is not a reliable assessment upon which to derive a minimum density target to apply across the City's diverse administrative area, from Clifton Road to the City Centre. Fundamentally, the methodology adopted in the Housing Study appears is contrary to the guidance set out in the updated Edinburgh Design Guidance (January 2020). An updated assessment has been obtained from the Council. This includes

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completions from 2019, therefore presenting analysis over the period from 2008 to 2019. As a result, the figure of 65 dwelling per hectare (gross) across Edinburgh has decreased to 59 dwelling per hectare (gross). There are a number of concerns with the approach adopted to assess evidence presented. For example, 29 of the sites in the assessed have a site area of less than 300 square metres. This equates to a detached house with front and back garden.

These sites (a mixture of Brownfield and change of use in the main) generate an average density of 306 homes per hectare (gross). This is on the basis of four or five storeys of development on sites as small as 105 square metres. It is not logical to compare this type of development and density to larger sites, be it Brownfield or Greenfield site. The concept of using the basic analysis to form a policy for minimum density across the city is flawed. When Brownfield and Greenfield sites are considered separately, the following densities are concluded: • Brownfield - 70 dwellings per hectare (gross); and • Greenfield – 30 dwellings per hectare (gross). Brownfield sites do not always require significant new supporting infrastructure. The gross area identified may only be that of the existing use prior to demolition or the area required for change of use / conversion. Greenfield sites generally require significant new supporting green and blue infrastructure, as well as roads and other development uses. Greenfield sites are also required to protect the character of existing settlements and should not undermine green belt objectives in accord with the development plan and national policy. The SESplan SDP policy framework requires local settlement character to be maintained. Homes for Scotland has made representations to the Choices for City Plan consultation, highlighting the requirements necessary to achieve a density of 65 homes per hectare. Firstly, when applying a typical gross to net ratio (assuming 70% of the site is “developable” – applicable to greenfield and larger brownfield sites) then that minimum density would rise to 93 homes per hectare (net). To achieve a density of 65 dwellings per hectare (net) would require a 50/50 mix across a site of 4 storey flats and 2 storey housing, but only if 2/3 of the housing is terraced. This will derive a layout providing predominantly smaller 1, 2 and 3 bed homes with little prospect for providing any larger family housing, for which there remains significant demand. To achieve a density of 93 homes per hectare (net) or 65 per hectare (gross) would require a different design solution which would require a greater percentage of flats (around 75%) or much higher flatted buildings (around 6 storeys). Given there will be a requirement for Greenfield release in order to meet the housing supply target, the principle of such minimum densities in Greenfield locations is not supported. Instead it would likely cause significant adverse impact to the local settlement character and setting of the City. This would be contrary to the approved SESplan SDP and national guidance. To achieve the proposed minimum density, development across the City would be required to adopt a standardised design approach driven solely by meeting density target. This is at odds with the built form and character of the City and how it has evolved into different character areas over time. This would be contrary to the approved SESplan SDP and national guidance, as well as the Council's own Design Guidance. Further, there would be little scope for variety in housing mix and very little prospect of delivering much needed family housing in the City, and the minimum density proposed will require almost entirely smaller 1, 2 and 3 bed homes. It can therefore be concluded that a minimum density of at least 65 dwelling per hectare (gross) across Edinburgh is inappropriate and should not be adopted for City Plan 2030. Indeed, we would not support any policy based on a minimum density target. The current approved policy framework requires new housing development to be built at a density appropriate to its location, complying with any site specific development briefs. The Edinburgh Design Guidance (November 2018) sets out the clear requirements for the density of new development. The requirement for appropriate density should continue to reflect this approach.

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Choice 2 C

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

Short Response

Explanation We support the principle of revising design and layout policies to achieve ensure their layouts deliver active travel and connectivity links. However, development can only physically deliver active travel infrastructure within the confines of the applicant's land control. Off site links cannot be delivered where third party land ownership is involved. However, Part 2 Section 2 Design Principles for New Development of the adopted LDP and the Edinburgh Design Guidance (November 2018) already provides a policy framework in accord with the Edinburgh Council Street Design Guidance and the six qualities of successful places in SPP (as well as Designing Streets and Creating Places). City Plan 2030 should therefore continue to adopt the existing policy framework set out in the adopted LDP which has regard to development quality, site layouts, public realm and landscape as well as the policy framework on open spaces and private spaces. This should build upon the existing policy framework set out in the Edinburgh Design Guidance (November 2018).

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 We support the principle of all development to deliver quality open space and public realm, useable for a range of activities, including drying space, without losing densities. However, there is insufficient detail in the Choices for City Plan document to understand what the impact of this policy requirement might be. Part 2 Section 2 Design Principles for New Development of the adopted LDP already provides a policy framework in accord with the statutory requirements of the approved SESplan SDP. Further, the Edinburgh Design Guidance (November 2018) already sets out the clear requirements for new development to deliver quality open space and public realm, useable for a range of activities without losing densities. City Plan 2030 should therefore continue to adopt the existing policy framework set out in the adopted LDP which has regard to development quality, site layouts, public realm and landscape as well as the policy framework on open spaces and private spaces. This should build upon the policy framework set out in the Edinburgh Design Guidance (November 2018).

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Choice 3 A

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

Short Response: Current Building S

Explanation CALA supports the ambition to reduce carbon dioxide emissions and recognises the role that delivering increasing efficient homes can play in this regard. It is anticipated that further reductions in carbon dioxide will be required when building standards are updated in 2021 with further planned changes again in 2024 preventing the installation of gas boilers. We are firm in the view that emissions standards for new buildings should continue to sit within the building standards regulatory regime. The planning system is already under significant pressure and it is not appropriate to increase the planning burden even further by adding to its list of responsibilities by duplicating work already done by other departments, and handled under a separate legislative regime. Current additional standards (such as Platinum, Gold Silver) may become out of date with future review of building standards. Particularly so as any proposed policy will only really begin to have an impact from c. 2024 onwards when permissions granted once the new LDP is adopted in 2022 are completed. By this time two new iterations of the building standards may have come into place. Adding different targets in the planning system simply complicates matters. The proposed move to require Platinum standard as a policy within the Local Development Plan, would result in significant cost implications for new buildings. This would affect not only private residential units, but also those for affordable housing. In combination with other policies proposed, in particular the requirement for 35% affordable housing, requirement for mixed uses, there is a significant risk to development viability. This is applicable especially to brownfield redevelopment, but also to greenfield locations. It also poses a significant risk to the Council's affordable housing delivery aspiration. Additional funding will be required to meet the higher standard and there is no indication as to where this funding will be sourced. Until such time as Scotland wide approach is taken, with further discussion and direction from Scottish Government Building Standards Division, all buildings and conversions should meet the current Building Standards. This matter should continue to be dealt with through nation-wide Building Regulations, not planning policy.

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Choice 4 A

We want to work with local communities to prepare Place Briefs for areas and sites within City Plan 2030 highlighting the key elements of design, layout, and transport, education and healthcare infrastructure development should deliver. Do you agree with this? - Yes / No

Short Response: No

Explanation We support the aspiration to work with local communities to prepare Place Briefs for areas and sites within City Plan 2030. However, Place Briefs are should not solely be informed by the Council and the local community. There are many issues and requirements affecting the timely delivery of a development which can best be factored into a Place Brief by experienced developers and house builders. This also extends to service providers such as Scottish Water, Scottish Power, SGN and others. If it is left only to the Council and local community to create Place Briefs there is a significant risk that the final Brief will contain requirements that simply cannot be delivered. A sustainable and deliverable Place Brief only comes from comprehensive information assessment where physical constraints and limitations are fully known, shared and accepted by all parties. All parties, including landowners and developers, need to be involved in directing the look and feel of development and how the development will help deliver infrastructure required to support them. This is particularly relevant for strategic land releases. The proposed Place Briefs need to be informed by up to date data, adopted in a holistic manner that local communities can digest. Issues such as transport, education and healthcare infrastructure needs to be prepared adopting expert advice and evidence including that held by the private sector. For example, an existing problem with local infrastructure (access to appointments in medical practices) may be wholly unrelated to future development aspirations. Pre-application consultation remains a statutory element of the Scottish planning system and the development of Place Briefs should dovetail into this process. The Council needs to be open to the feedback from this communication process. Accordingly, Policy Des 2 Co-ordinated Development remains an appropriate policy for City Plan 2030 subject to amendments in the supporting text. City Plan 2030 should therefore continue to adopt the existing policy framework set out in the adopted LDP.

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Choice 4 B

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

Short Response: Not Answered

Explanation

The Local Place Plans are should not solely be informed by the Council and the local community. Deliverability should be a key aspect of the LDP. This should be reflected in Local Place Plans. Therefore all parties, including landowners, developers and service providers, need to be involved in directing the look and feel of development and how the development will help deliver infrastructure required to support them. This is particularly relevant for the larger strategic land releases. The success and failure of community involvement efforts in implementing Local Place Plans can be linked in part to a community's level of readiness and existing level of social capacity and of course, a willingness to engage to deliver rather than oppose development. The preparation of the Local Place Plan may have the benefit of concentrating a great deal of discussion, argument, understanding and resolution in a very short time. Their success will depend on the right preparation being done to make that intensive effort worthwhile, and the timing being right, so that the proceedings in the planning and design process come neither too early nor too late. There will be some areas in Edinburgh that have the readiness and capacity to undertake these Local Place Plans. However, there will be some that do not. As a result, the Council needs to ensure that Local Place Plans for City Plan 2030 do not unintentionally misinform what the design, layout, and transport, education and healthcare infrastructure requirements should deliver. The proposed Local Place Plans need to be informed by up to date data, adopted in a holistic manner that local communities can digest. Issues such as transport, education and healthcare infrastructure need to be prepared adopting expert advice and evidence including information provided by the private sector and service providers. Pre-application consultation remains a statutory element of the Scottish planning system and the development of Place Briefs for allocated sites should dovetail into this process.

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Choice 5 A

We want City Plan 2030 to direct development to where there is existing infrastructure capacity, including education, healthcare and sustainable transport, or where potential new infrastructure will be accommodated and deliverable within the plan period. Do you agree with this? - Yes / No

Short Response

Explanation

We support the requirement for 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. We accept that the education, healthcare and transport infrastructure will be dependant on the development strategy adopted for City Plan 2030, either Option A Urban Area Sites, Option B Greenfield Sites or Option C Blended Approach. We are of the view that Option C remains the only viable Option presented to meet the housing requirements set by SESplan SPD which City Plan 2030 needs to comply with to determine the scale of housing required. Therefore, a mixture of the education, healthcare and sustainable transport infrastructure identified will be required to implement this development strategy. It is accepted that evidence presented in the Council's Housing Study is incomplete and a full education as well as transport infrastructure appraisal will be required to support City Plan 2030. However, it is noted that only two transport corridors have been identified as being suitable for the delivery of new transit-solutions to help deliver City Plan 2030 – the South East Edinburgh via BioQuarter (Corridor 3) and Towards Newbridge and IBG (Corridor 7). This is contrary to the Edinburgh Strategic Sustainable Transport Study (Phase 1). This Study identifies four transport corridors which transit-based options should be considered further for City Plan 2030. These are: • South East via BioQuarter (Corridor 3); • Granton (Corridor 6); • Newbridge (Corridor 7); and • West of Hermiston (Corridor 8). The Choices document has therefore omitted the West of Hermiston (Corridor 8), which is determined as an appropriate transit-based option. The Choices document therefore needs to align its transport with the evidence presented in the Edinburgh Strategic Sustainable Transport Study (Phase 1). New housing development in locations that support the delivery of these transport corridors should be supported by the Council. One example of this is Currievale, where we have concerns with the Council's Site Assessment. In particular, we believe that it has incorrectly concluded that there is no education capacity and poor transport links. In terms of education, the latest Roll Projections show capacity at Currie Primary School in 2027/27 for 99 pupils. This does not take account of Phase 2 of the approved expansion (17/05182/FUL). 4 additional classrooms and ancillary accommodation is still to be provided, giving capacity for at least a further 100 pupils. There is scope to investigate the replacement Currie High School. Currievale can support a capacity increase to support additional pupils through appropriate planning obligations. It is already planned to increase capacity to 1,000 pupils. Both can be delivered in the plan period. In terms of transport, Currievale is adjacent to Curriehill Station. • The existing service frequency during peak periods is the same as Shawfair (a major expansion to the South East), the rail fair is cheaper and the service calls at Wester Hailes, Slateford and Haymarket prior to Waverley (all of which are important commercial/employment centres). To the west, the service calls at Kirknewton and Livingston and West Calder, which are locations identified for strategic expansion in West Lothian. It is confusing, why CEC ignores the Curriehill service while another Council regards it as strategically important public transport corridor where development may be located. • Electrification of the line has been completed as part of a £160m strategic investment by Scotrail. A substation upgrade is underway and scheduled to be completed in May 2020, will enable greater frequency of service to run. This provides access to the City Centre within 20 minutes. In conclusion, development of Currievale is NOT dependent on future rail investment. That investment

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is already in place, unlike other greenfield or brownfield choices identified. • The Spatial Vision diagram highlights a potential public transport corridor from Balerno, through the north of Currie and on to the west of Edinburgh (South Gyle/Edinburgh Gateway). Currievale can deliver a new road/bus route from the A70 Lanark Road West at Newmills Road through to Riccarton Mains Road. This is on land wholly owned or controlled by CALA and can be delivered at an early stage in the development at Currievale. • A new car and secure cycle parking facility can be delivered adjacent to the existing rail crossing to provide additional parking for Curriehill Station. Bus turning facilities can also be provided. This creates a multi modal public transport/active travel hub. This would deliver one of the key points highlighted for this corridor in the ESSTS. • Through further discussion with Lothian Buses, we believe there is potential for a new or extended service from Balerno, through Currievale via Curriehill Station and on to Riccarton, Hermiston, Edinburgh Gateway and South Gyle. This would provide a missing link in bus services from the area. This is another key measure identified in the ESSTS that Currievale can assist in delivering. • These actions would provide direct public transport access to the west of Edinburgh that is currently missing. There is potential for significant modal shift away from the car to public transport with improved bus service and better access to Curriehill Station. Supporting modal shift is a key objective of the Mobility Plan and emerging City Plan. Currievale is a location where there is capacity available to accommodate development in the short term with scope to deliver additional infrastructure within the plan period.

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 We support the principle of City Plan 2030 setting 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. This needs to be supported by a robust appraisal justifying such requirements. We note that the Edinburgh Health and Social Care Partnership will be preparing a Primary Healthcare Appraisal as part of City Plan 2030. The Council will be aware any financial contributions being sought for new community facilities, such as healthcare, need to meet all the tests of an acceptable obligation in accord with Section 75 of the Act (as per the Elsieck case) and the guidance as set out in Circular 3/2012 Planning Obligations and Good Neighbour Agreements. There is need for the Council to be fully satisfied that its infrastructure requirements are assessed by a methodology which meets the tests in Circular 3/2012. The direction from Scottish Ministers to the Council not to adopt its draft Supplementary Guidance was fundamentally based on the Council being unable to evidence its impacts and relate this to its defined planning obligations.

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Choice 5 C

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

Short Response

Explanation

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

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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 We do not support the use of cumulative contribution zones to determine infrastructure actions, costs and delivery mechanisms. The Council will be aware that cumulative contribution zones were adopted for its Supplementary Guidance Developer Contributions and Infrastructure Delivery. Following examination by Scottish Ministers, direction was given to not to adopt and issue this document. The reasons given were: • The inclusion of details of healthcare actions, contributions and contribution zones within the Supplementary Guidance does not meet the requirements of regulation 27(2) of The Town and Country Planning (Development Planning) (Scotland) Regulations 2008. These matters are not expressly identified in a statement contained in the plan as matters which are to be dealt with in Supplementary Guidance; • It has not (on the evidence presented) been demonstrated that the contributions sought through the Supplementary Guidance, in particular levels of education and road transport contributions: • Fairly and reasonably relate in scale and kind to the proposed development; • Reflect the actual impacts of, and be proportionate to, the proposed development; • As presented, the Supplementary Guidance does not provide sufficient certainty that contributions sought on the basis of it will be always be used for the purpose for which they were gathered. In relation to contribution zones, Circular 3/2012 Planning Obligations and Good Neighbour Agreements is clear that contributions should relate to the proposed development either as a direct consequence of the development or arising from the cumulative impact of development. In order to establish this, it is important for the Council to have a robust evidence base to exhibit and demonstrate this relationship. We also have significant concerns with the accuracy of the potential education infrastructure requirements identified in the Choices document. The Housing Study background paper confirms: "The five potential greenfield allocation areas identified in Choice 12 have been assessed on a stand-alone basis for their education infrastructure requirement. Each of the proposed Place Briefs within Choices for City Plan 2030 sets out the education infrastructure required based on 65 dwellings per hectare and an 80/20 house/flat split" (para 2.5). It will not be possible to achieve a density of 65 per hectare (gross) by providing 80% houses and 20% flats. In fact, the split is more likely to be around 75% flats and 25% houses. The consequence of the approach taken by the Council significantly overestimates the number of pupils (as the pupil rate is higher for a house than a flat). In turn, this means that the infrastructure requirements is also significantly overstated. In order to ensure that City Plan 2030 has a clear and deliverable infrastructure strategy, it is fundamental that proposed new allocations are programmed in order to identified what infrastructure is required in which location and when. This would best be informed through engagement and consultation with Homes for Scotland and its membership.

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Choice 5 E

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

Short Response

Explanation We do not support the principle to stop using statutory supplementary guidance. The Council should not only set out guidance for developer contributions within the City Plan 2030 and the associated Action Programme. There is very limited opportunity for proper scrutiny of the Action Programme. Guidance for developer contributions should not be set out in non-statutory guidance. The direction from Scottish Ministers to not to adopt and issue the Supplementary Guidance Developer Contributions and Infrastructure Delivery supports this position. The Council needs to focus on developing its methodologies for assessing impacts on community infrastructure which are in accord with practices in Scotland and can demonstrate through robust and justified evidence that the outcomes are in accord with the tests in Circular 3/2012.

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 insufficient detail provided in the City Plan Choices paper and Background Documents to have a clear understanding of the intentions of the policy. There is no information available on what the targets might be derived, justified and monitored. It is unclear how the policy will be able to respond to any changes in public transport timetables that may occur over the plan period. Planning Advice Note 75 Planning for Transport Annex B Personal Accessibility Analysis provides the basis for identifying accessibility profiles for new development. City Plan 2030 should therefore continue to adopt the existing policy framework set out in the adopted LDP.

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Choice **6 B**

We want to use Place Briefs to set the targets for trips by walking, cycling and public transport based on current and planned transit interventions. This will determine appropriate parking levels to support high use of public transport. Do you agree with this? - Yes / No

Short Response

Explanation

Choice **7 A**

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

Short Response

Explanation

Choice **7 B**

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

Short Response

Explanation

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Choice **7 C**

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

Short Response

Explanation

Choice **7 D**

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

Short Response

Explanation

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Choice **8 A**

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

Short Response

Explanation

Choice **8 B**

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

Short Response

Explanation

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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 Where these active travel links are related to proposed allocations it is fundamental that there is a clear understanding of land ownership constraints. City Plan must avoid requiring allocations to deliver off-site links where land is under third party control, unless the Council is prepared to intervene and deliver the link subject to financial contributions. Such contributions must be based on robust cost evidence. There is an opportunity through the proposed development at Currievale to develop a new active travel link from the A70 Lanark Road at Newmill, all the way through to Westside Plaza at Wester Hailes via Baberton Road. There is no requirement for a new bridge crossing as the infrastructure is already in place. The Water of Leith route (NCR 75) appears to be a major omission from the proposals. There is an opportunity also to provide a route from Currie along Riccarton Mains Road to Hermiston P&R. It is noted that these routes were identified either in whole or in part in the Council's Active Travel Action Plan (2016 refresh).

Choice **8 C**

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

Short Response

Explanation

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Choice **9 A**

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

Short Response

Explanation

Choice **9 B**

We want to create a new policy on the loss of homes to alternative uses. This new policy will be used when planning permission is required for a change of use of residential flats and houses to short-stay commercial visitor accommodation or other uses. Do you agree with this? - Yes / No

Short Response

Explanation

Choice **10 A**

We want to revise our policy on purpose-built student housing. We want to ensure that student housing is delivered at the right scale and in the right locations, helps create sustainable communities and looks after student's wellbeing. Do you agree with this? - Yes / No

Short Response

Explanation

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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 We welcome efforts to boost housing supply. However, this policy will not be applicable in all circumstances, particularly for industrial uses, which by definition cannot exist in close proximity to residential development. A mixture of uses, particularly in the same building can create a number of complications. In all cases it is important that land uses are compatible and there is no amenity conflict between residential and retail/commercial uses. We would suggest that such a policy may be worthwhile, but it should not be a strict requirement and could be subject to some caveats such as where a mix is appropriate and viable.

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 CALA supports efforts to boost the housing land supply. However, this approach is likely to be dependent on site specific considerations and the aspirations of the owners. There is no certainty on whether land could be made available and deliver completions within the plan period due to a number of factors such as length of leaseholds and legal burdens on land use. It should not be relied upon to deliver new supply. In all cases it is important that land uses are compatible and there is no amenity conflict between residential and retail/commercial uses.

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Choice **11 A**

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

Short Response

Explanation

We understand the Council's intention to the principle of amending the policy to increase the provision of affordable housing requirement from 25% to 35%. However, a policy setting the provision of affordable housing requirement at 35% would not accord with the approved SESplan SDP as well as national policy requirements in SPP. Further, when other proposed policy updates are taken into account such as Platinum standard aspirations, additional open space requirements and other infrastructure requirements, the increase in affordable housing provision presents a significant risk to development viability. The approved SESplan SDP identifies that 25% of the total number of homes to be provided on each site as affordable housing. SPP is also clear that the level of affordable housing required as a contribution within a market site should generally be no more than 25% of the total number of houses. Affordable housing is defined broadly as housing of a reasonable quality that is affordable to people on modest incomes. SPP confirms that affordable housing may be provided in the form of social rented accommodation, mid-market rented accommodation, shared ownership housing, shared equity housing, housing sold at a discount and low cost housing without subsidy. It is noted that the approved SESplan SDP acknowledges that each local development plan area will have its own characteristics and significant variations in need. Therefore, City Plan 2030 will need to set out an appropriate approach for the provision of affordable housing taking account of local housing waiting lists and housing need and demand evidence. The Council will be aware that for the adopted LDP, the Reporter concluded that a percentage higher than 25% or an absolute requirement for on-site delivery would not be appropriate or realistic. The Reporter also identified that this does not prevent higher percentages of affordable housing being delivered where grant funding is available or where provision may be enabled through a social housing provider. This position is endorsed by Scottish Ministers. Therefore, any policy revisions for City Plan 2030 will have to confirm that any impact on the viability of the development will be taken into account and identify other ways of developers and house builders delivering their contribution to affordable housing provision where 35% is not achievable. An increase in affordable housing to 35% needs to take account of the level of grant funding available to build these affordable homes. Given the tenure mix for affordable homes, realistically more affordable homes may need to be low cost housing and not social renting. Golden share as a low cost housing initiative is an example of providing more affordable housing without the need for grant support. If any increase above the current 25% requirement is to be considered, then we would strongly urge the Council to support greater use of Golden Share to assist in delivering the additional affordable homes. As the Council is aware, increasing affordable housing site also impacts on the need for a greater percentage of this housing tenure to fund the required community infrastructure through financial contributions. A minimum of 25% provision should still be referenced in the policy. Consideration should also be given to the nature of the tenure of the affordable housing required and the extent to which this can be met by proposals capable of development with little or no public subsidy. This is an important consideration for all land coming forward for other uses as set out in Choice 10 i.e. where a site is required to deliver at least 50% housing. A prescriptive affordable housing requirement for 35% may impact on viability and the deliverability of the primary use. Therefore, only low cost housing tenures specified in SPP should be applicable to meet the provision of affordable housing requirement if it is to be increased from 25% to 35%, with a minimum of 25% provision specified, and such amendments should be made to Policy Hou 6 Affordable Housing.

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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 With regard to housing types, we have expressed significant concern that the Council’s aspiration to set minimum densities for future housing developments would create. We strongly discourage the proposed minimum density policy. This is not supported by evidence and would be contrary to SESplan SDP and national guidance. There needs to be flexibility in the mix of housing types and tenures and a prescriptive approach would likely undermine the development strategy of Edinburgh if these new homes do not respond to market demand or Scottish Government funding initiatives. In our experience, the mix of housing tenure and types can change significantly over time. The local development plan period is 10 years and accordingly, policy should avoid being overly prescriptive. In addition, it is widely acknowledged that the housing need and demand outcomes are not wholly transferable to the planning system in terms of housing delivery. Currently, outcomes of housing need and demand covers only four tenures. The planning system identifies six tenures for affordable housing alone. The assumptions that underpin the outcomes from housing need and demand will respond to evolving economic and social circumstances over time, meaning that the outcomes based on one set of household projections and the underlying assumptions can change by the next set of projections. City Plan 2030 will therefore need a great deal flexibility to respond to the changing mechanics of the housing need and demand assessments and their outcomes as well as the mix of housing types and tenures of different locations across Edinburgh. Adopting a flexible approach to the provision of housing types and tenures is consistent with the requirements of SPP which acknowledges that planning can help to address the challenges facing the housing sector by providing a positive and flexible approach to development. Policy Hou 2 Housing Mix allows for the provision of a mix of house types and sizes where practical, to meet a range of housing needs, including those of families, older people and people with special needs, and having regard to the character of the surrounding area and its accessibility. City Plan 2030 should therefore continue to adopt the existing policy framework set out in the adopted LDP and referred to in Policy Hou 2 Housing Mix.

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Choice 12 A

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

Short Response Option 3 (Blended)

Explanation

We support the acknowledgement that City Plan 2030 needs to provide new homes for Edinburgh and further land will need to be allocated land for our new homes. However, we remain concerned about the approach that the Council has taken to identify the proposed housing supply target for City Plan 2030. This is confounded by the lack of any specific question in the Choices document relating to how the housing supply target should be derived and what evidence should be adopted to inform decision making. It is fundamental to the development strategy set out in City Plan 2030 that an appropriate housing supply target is derived in accord with a robust evidence base. The development strategy should then be identified to meet the housing land requirement. We note this is not the case as set out in the Choices document. The consultation questions give no option to question the proposed housing supply target. The Council has identified a preferred strategy and then identified a housing supply target to align with that strategy, without taking full account of the supporting evidence on housing need and demand. That is not in accord with SPP. The Choices document sets out three different Options regarding housing development strategy for City Plan 2030. Those three Options are as follows:

- Option 1 (Council/Partners/Urban Area)
- Option 2 (Market/Greenfield)
- Option 3 (Blended Approach)

All three Options have different nuances and factors which lead to alternative conclusion. The Choices document clarifies how each Option is determined in the following sections:

- a. How many new homes does Edinburgh need?
- b. Who will deliver these homes?
- c. How to deliver our new homes in the most sustainable way

The Housing Study presents further evidence to support conclusions reached for each Option. The detail contained within the Choices documents and associated Housing Study are discussed below.

A. How many new homes does Edinburgh need? We acknowledge that the City Plan 2030 is required to accord with the policy framework of the approved SESplan SDP. The policy framework of the approved SESplan SDP identifies housing supply targets on an all tenure (or overall) basis. SPP also requires local development plans should indicate the number of new homes to be built over the plan period within the overall housing supply target. The Housing Study confirms this position. City Plan 2030 will also be required to identify an appropriate housing land requirement, adding a generosity margin of between 10% and 20% to the appropriate housing supply target. This position is supported by the conclusions reached during the Examination of the adopted LDP, which were subsequently endorsed by Scottish Ministers. The housing supply targets for City Plan 2030 are required to be based on the evidence presented in a housing need and demand assessment (HNDA). The approved SESplan SDP is informed by HNDA 1 (2011). SESplan SDP 2 was rejected by Scottish Ministers. However, that development plan was informed by a new HNDA 2 (2015). For City of Edinburgh, HNDA 2 identified that City of Edinburgh had a total estimate of housing need and demand of 81,685 homes from 2012 to 2032 (a 20 year period) based on the Wealth Distribution scenario. The Wealth Distribution scenario was identified as the preferred scenario by the SESplan Joint Committee, of which Edinburgh Council are a constituent member. We note that the Housing Study identifies that the HNDA 2 remains the most up to date assessment of future housing need and demand for Edinburgh over this period and the Council proposes that HNDA 2 will be used to determine how much of the remaining regional housing supply target should be met within Edinburgh. The HNDA Practitioners Guide identifies that that both the future need (household projections) and existing need must be met through the provision of additional housing units. Similar to the housing supply target, this is tenure blind. As set out in Table 1 Scenarios of Need and Demand 2019-2032 (HNDA2) of the

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Housing Study, HNDA 2 confirms that there is need and demand of 81,685 homes from 2012 to 2032. Taking account of housing completions to date from 2012 to 2019 at 9,184 homes, there is a remaining housing need and demand of 67,174 homes over the period 2019 to 2032. We note that the Choices document does not refer to this and does not seek to identify or meet the evidenced housing need and demand. Instead, the suggested housing supply target relies on the remaining market housing element from HNDA 2 at 22,588 homes from 2019 to 2032 and advances the Councils affordable housing policy of 20,000 affordable homes by 2027 as the affordable housing element. This equates to the proposed all tenure (or overall) housing supply target of around 43,400 homes. It is noted that this housing supply target prepared for Option 1 (Council/Partners/Urban Area) assumes Brownfield delivery only led by ...the Council and its Partners. The Choices paper does not specify who the Council's partners are. The Choices document sets out an alternative housing supply target for a different development strategy, Option 2 (Market/Greenfield). Again, is based around the Council's affordable housing policy but assumes that housing delivery is led by the private sector based on Greenfield releases only. This adds a market housing element of 32,000 homes to the Council's affordable target of 20,800 homes, equivalent to the proportionate market (65%) and affordable (35%) for new housing sites. This equates to the proposed all tenure (or overall) housing supply target of around 52,800 homes. Unfortunately, neither of these housing supply targets meets the remaining housing need and demand identified from HNDA 2 is 67,174 homes over the period from 2019 to 2032. The two housing supply target Options presented by the Council fall significantly short of the unmet housing need and demand by either 23,774 homes (Option 1) or 14,374 homes (Option 2). The Council has not presented any evidence as to why City Plan should not seek to meet unmet housing need and demand in full by 2032. Following the rejection of SESplan SDP 2 by Scottish Ministers, there is no redistribution strategy or agreement from other constituent local authorities to absorb the balance of homes from Edinburgh that may not be met in City Plan 2030 as set out in Option 1 or Option 2. Therefore, any Option adopted by the Council should properly reflect the remaining housing need and demand in order to select an appropriate housing supply target. Based on the evidence presented in HNDA 2, Edinburgh needs 67,174 all tenure (or overall) homes. B. Who will deliver these homes? The Choices documents considers that it has a total potential land to be available for 47,000 homes and the sources are identified as follows: • Land identified in housing land audit for affordable housing – 6,100 homes; • Land identified in housing land audit for market housing – 14,800 homes; • Other land in housing land audit (without consent) – 9,200 homes; and • Potential urban area land identified through Housing Study – 16,900 homes. Therefore, the Choices considers that there is effective housing land for 20,900 homes in the 2019 Housing Land Audit, a further 9,200 homes on land that are without consent in the 2019 Housing Land Audit. This is a total of 30,100 homes in the 2019 Housing Land Audit. An additional 16,900 homes on land within the urban area. We have reviewed the 2019 Housing Land Audit. This document identifies an established housing land supply of 30,164 homes. From these 30,164 homes, the following is acknowledged: • Under Construction – 6,886 homes; • Consent – 7,471 homes; • No Consent – 8,022 homes; • Small Sites – 317 homes; and • Constrained – 7,468 homes. Sites with a total capacity of 14,357 homes are under construction or have consent in the 2019 Housing Land Audit. This is significantly lower than that identified in the Choices document at 20,900 homes. Sites with a total capacity of 15,490 homes are without consent or are considered constrained in the 2019 Housing Land Audit. This is significantly larger than that identified in the Choices document at 9,200 homes. We are aware that as time moves on those sites identified as being without consent or constrained may become effective. However, the Choices document's reliance on constrained sites within the 2019 Housing Land Audit is concerning. Those 22 constrained sites with a total capacity of 7,468 homes are allocated in the adopted LDP, are Brownfield sites and were identified as constrained during the Examination process. We note that the preferred Option is to seek to identify a further 142 Brownfield sites, amounting to a potential capacity of 16,900 homes, as the only locations for future housing development. Similar to the reasons why the current allocated constrained sites cannot become effective (site is in use, intentions of landowner unknown, contaminated land, viability, etc.), this preferred Option has the potential to introduce further constrained sites into the housing land supply. Particularly when proposed policy requirements on open space, carbon reduction and cost of

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delivery of new infrastructure is taken into account. The Choices document acknowledges that these 16,900 homes will be on around 275 hectares of land within the urban area and that much of this land is in other uses at present. The Housing Study confirms that only 11 hectares is vacant land ready for development, 30 hectares has planning consent and the remainder (234 hectares) is currently in use as employment land. Seeking to adopt a development strategy for City Plan 2030 on the basis of 275 hectares of land where the intentions of the landowner or may remain in alternative use presents a significant risk to the Council that it will not be able to meet the housing supply target. We note that of the 142 sites identified, 78 sites are identified by the Housing Study (Figure 2 Assessment of site groupings) and Environmental Report as being unsuitable for development and should not be included in any further assessment for City Plan 2030. These 78 sites have a potential capacity of 8,383 based on a medium low density. The remaining 64 sites have been identified by the Housing Study (Figure 2 Assessment of site groupings) as being suitable for development and have a potential capacity of 8,333 homes based on a medium low density. Therefore, the Council's evidence base would suggest that if it considered 8,383 are not suitable for development, then the maximum figure that can be accounted for from brownfield development would be the 8,333 homes from the 64 sites deemed as suitable for development. If the City Plan 2030 wish to deliver a significant proportion of the homes required to meet the remaining housing need and demand of Edinburgh, which is 67,174 homes, Option 1 Delivery by the Council and its partners within the Urban Area will not achieve that outcome. The shortfall arising from this development strategy will be significant as many of these sites will become constrained. There is no certainty that any of the Brownfield sites identified will come forward within the plan period to 2032. The Choices document has not identified a development strategy or a development programme that demonstrates which sites it expects will contribute to the housing supply target. In order to ensure that a five year effective housing land supply is maintained at all times, it is likely that the Council will be required to intervene at the date of adoption of City Plan 2030 in order to secure the land required through Compulsory Purchase. This Compulsory Purchase strategy will be complex and time consuming with a significant number of the sites identified in the Housing Study are in existing use. The land value of the existing use may be higher than it would be for residential use. There will also be a requirement to relocate an existing business that is subject to Compulsory Purchase. At this stage, the Council does not know the extent of intervention that will be required, nor the cost implication that this will bear. How to deliver our new homes in the most sustainable way We consider that Option 3 A blended approach is the only appropriate development strategy to enable the outstanding housing need and demand of 67,174 homes from 2019 to 2032 to be met in the most sustainable way. Any proposed Brownfield or Greenfield allocations for City Plan 2030 should be supported by evidence that identifies that they can contribute to meeting the housing land requirement to 2032 and scale of this likely contribution. Therefore, the housing supply target identified as 52,800 homes should be the minimum all tenure (or overall) housing supply target. This remains 14,374 homes below the unmet housing need and demand from 2019 to 2032 and the Council will need to provide robust evidence why the remaining housing need and demand will not be met in full. Prior to identifying the scale of new Brownfield and Greenfield allocations, City Plan 2030 will need to establish the housing land requirement. The adopted LDP identified a 10% generosity margin to be applied to housing supply target and this was endorsed by Scottish Ministers. Given that the Choices document perceives challenges in meeting the housing supply target of 52,800 homes, a further increase in the margin of generosity would serve no clear planning purpose. The housing land requirement should be 58,080 homes. Accordingly, Table 1 Delivery by the Council and its partners should be deleted and any reference removed from City Plan 2030. Table 2 Delivery through market housing can be retained but aligned with the adopted LDP. Adopting evidence set out in the 2019 Housing Land Audit, City Plan 2030 will be required to allocate the following scale of new housing allocations: Housing Supply Target 52,800 Plus 10% Generosity 5,280 Housing Land Requirement 58,080 Effective Housing Land Supply (2019 Housing Land Audit) 22,696 Land to be Allocated in City Plan 2030 35,384 City Plan 2030 will be required to allocate new housing land for around 35,000 homes. Should any constrained sites identified in the 2019 Housing Land Audit become effective, these may assist the delivery of the housing land requirement by 2032. The City Plan 2030 will

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also be required to take account of any demolitions to housing stock over the period from 2012 to 2032. Approved SESplan SDP identified around 4,000 demolitions over this period. We therefore support Option 3 A Blended Approach to allocate around 35,000 homes on both Brownfield and Greenfield sites.

Choice 12 B1

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

Short Response

Explanation

Choice 12 B2

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

Short Response

Explanation

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Choice **12 B3**

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

Short Response

Explanation

Choice **12 B4**

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

Short Response

Explanation

Choice **12 B5**

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

Short Response

Explanation

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Choice **12 B6**

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

Short Response

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

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

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Choice **12 B9**

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

Short Response

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

Choice **12 BX**

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

Short Response

Explanation

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Choice 12 C

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

Short Response

Explanation

Choice 12 C

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

Short Response

Explanation

Choice 12 C

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

Short Response

Explanation

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Choice 12 D

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

Short Response

Explanation

Choice 13 A

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

Short Response

Explanation

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Email

Choice 14 A

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

Short Response

Explanation

We support the principle of the making 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. However, adopting “an area of search” approach over the identification of sites will not achieve this purpose. There is no detail as what “an area of search” consists of. Therefore, City Plan 2030 needs to allocate land for specific uses in order to understand the transport infrastructure required to implement a strategy for West Edinburgh. Only through the allocation of land for development, can the transport infrastructure requirements be fully assessed and appropriate policy framework to developer contributions be implemented. The Edinburgh Strategic Sustainable Transport Study (Phase 1) identifies two transport corridors in West Edinburgh which transit-based options should be considered further for City Plan 2030. These are: • Newbridge (Corridor 7); and • West of Hermiston (Corridor 8). City Plan 2030 should align its transport strategy with the evidence presented in the Edinburgh Strategic Sustainable Transport Study (Phase 1) and the City Mobility Plan's Spatial Vision. New land allocations for a variety of uses in locations that support the delivery of these transport corridors should be supported by the Council. However, we are concerned that the full extent of Corridor 8 West of Hermiston from the ESSTS has not been replicated fully in the Choices document. The area to north of Currie (Currievale) and Curriehill Station has specifically been excluded. This is illogical for a number of reasons: Curriehill Station provides regular services to the City Centre, West Lothian and Glasgow - the level of service is similar to that from Shawfair to the east. Significant funds have been spent electrifying the line, providing additional carriages and there is scope for increase in frequency of service. There is no requirement for additional funds to deliver this. This is a sustainable transport corridor, aligns with the development strategy in West Lothian. The ESSTS highlights a number of benefits that can be delivered for Currie and Balerno, including improved bus services and interchange at Curriehill Station. This in turn has fed through to the Mobility Plan's Spatial Vision. These are deliverable in the plan period through CALA's proposal for Currievale, but has not followed through to the Choices Paper, contrary to the Council's evidence base.

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

Supporting Info
Email

Choice **14 B**

We want to remove the safeguard in the existing plan for the Royal Highland Showground site to the south of the A8 at Norton Park and allocate the site for other uses. Do you agree with this approach? - Yes / No

Short Response

Explanation

Choice **14 C**

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

Short Response

Explanation

Choice **15 A**

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

Short Response

Explanation

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

Supporting Info
Email

Choice 15 B

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

Short Response

Explanation

Choice 15 C

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

Short Response

Explanation

Choice 15 D

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

Short Response

Explanation

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

Supporting Info
Email

Choice 15 E

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

Short Response

Explanation

Choice 15 G

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

Short Response

Explanation

Choice 16 A1

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

Short Response

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **16 A2**

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

Short Response

Explanation

Choice **16 A3**

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

Short Response

Explanation

Choice **16 A4**

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

Short Response

Explanation

Customer Ref: Response Ref:

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? - Yes / No

Short Response

Explanation

Choice **16 A5**

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

Short Response

Explanation

Choice **16 B**

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

Short Response

Explanation

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

Supporting Info
Email

Choice 16 C

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

Short Response

Explanation

Choice 16 E1

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

Short Response

Explanation

Choice 16 E2

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

Short Response

Explanation

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

Supporting Info
Email

Choice 16 E3

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

Short Response

Explanation

Choice 16 E4

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

Short Response

Explanation

Choice 16 E5

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

Short Response

Explanation

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

Supporting Info
Email

Choice 16 E6

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

Short Response

Explanation

Choice 16 E7

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

Short Response

Explanation

Choice 16 E8

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 EX

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

Short Response

Explanation

Choice 16 F

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

Short Response

Explanation

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

Supporting Info
Email

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

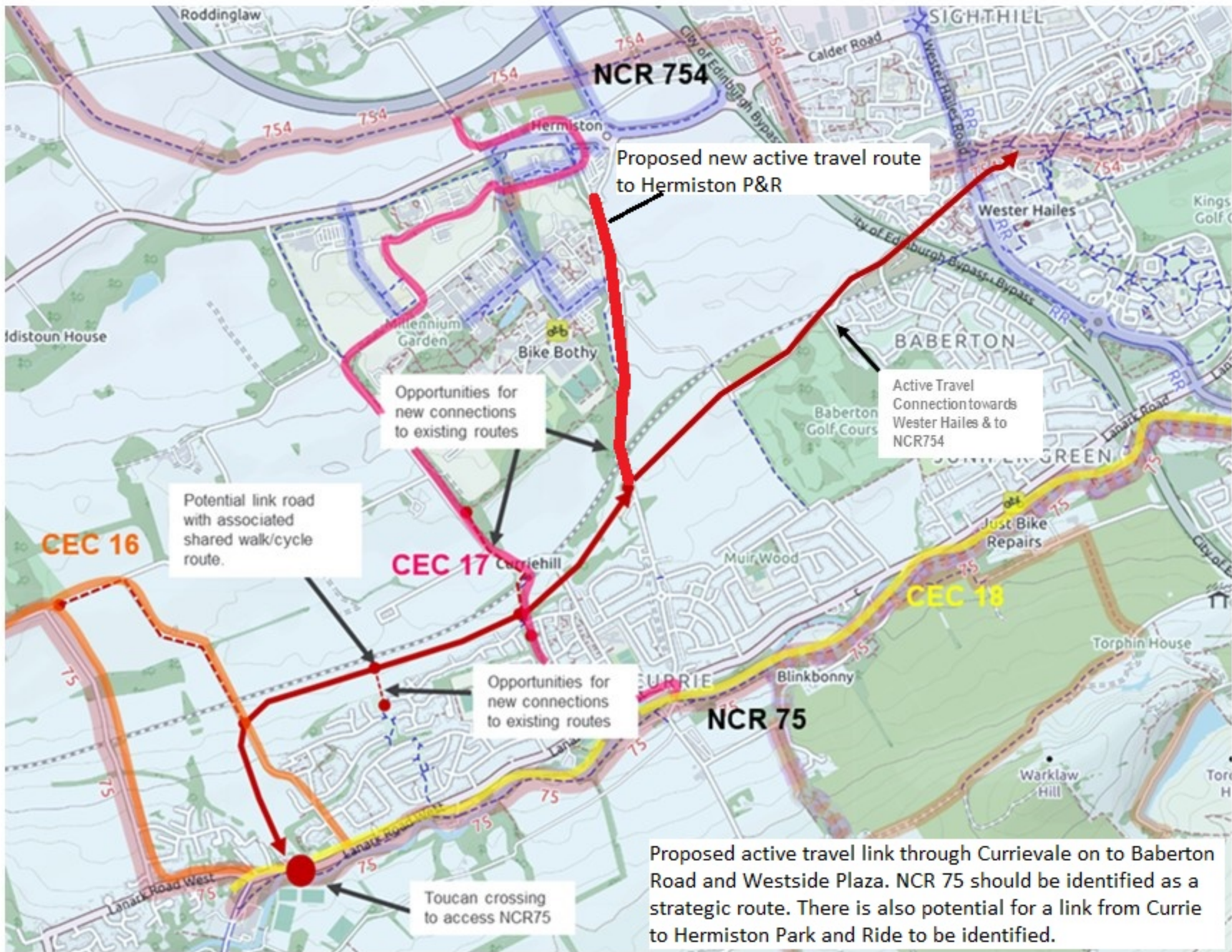
Explanation

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



LAND AT CURRIEVALE - EXECUTIVE SUMMARY

- CALA Management Ltd (CALA) is promoting land at Currievale, to the north of Currie, for allocation in the Edinburgh City Plan 2030.
- The land at Currievale is either owned or controlled by CALA. The development can proceed without complex third party land requirements.
- Important infrastructure to support development, such as roads, active travel connections support for bus services, community and education infrastructure can be delivered early in the development and within the plan period.
- We believe that the site should have scored higher than it did in the Council's Site Assessment. In particular, we have concerns that the approach to education capacity and public transport accessibility is inaccurate and inconsistent with other Site Assessments.
- It is also a concern that the Council has split the proposed development area into three separate Site Assessment Areas. The Council has assessed three separate areas. It has not carried out an assessment of Currievale as proposed, and it has not taken account of the details of what is actually proposed.
- Currievale has still scored better in the assessment than other non-SDA sites identified as potential greenfield allocations at Kirkliston, Calderwood and East of Riccarton. We believe that the site should be re-assessed for the reasons outlined below.

Location

- The Curriehill site is very well located, close to major employment hubs in west Edinburgh. Sighthill, South Gyle, Gogarburn and Edinburgh Airport are all within 5km.
- The site is within Area 11 (South West Edinburgh) which was identified in the Spatial Strategy Re-assessment for the Supplementary Guidance to identify housing land requirements for SESplan constituent LDPs. This confirms that the area has capacity to accommodate strategic scale development, with only Currievale noted in the landscape appraisal as having landscape capacity.
- There are existing shops and employment opportunities in the locality. Through consultation with the existing communities along the A70 corridor (Juniper Green, Currie and Balerno), the proposal can deliver new community facilities and employment opportunities.
- The site also lies with Corridor 8 – West of Hermiston as defined in the Edinburgh Strategic Sustainable Transport Study (ESSTS) prepared to inform the City Mobility Plan. Currievale can assist in delivering strategic public transport benefits, contributing to the aims and objectives of the Mobility Plan, within the plan period.

Transport

The site has been assessed negatively in terms of access to public transport and fit with the potential strategy for the City Mobility Plan.

We strongly disagree with this assessment for the following reasons:

- The site is within Corridor 8 – West of Hermiston, which is one of the key corridors in the ESSTS/Mobility Plan. This key corridor area has not been accurately replicated in the Choices for City Plan document which we believe erroneously excludes Currievale.

- Curriehill Station is already adjacent to the site. The existing service frequency during peak periods is the same as Shawfair (a major expansion to the South East), the rail fare is cheaper and the service calls at Wester Hailes, Slateford and Haymarket prior to Waverley (all of which are important commercial/employment centres). To the west, the service calls at Kirknewton and Livingston and West Calder, which are locations identified for strategic expansion in West Lothian. It is confusing, why CEC ignores the Curriehill service while another Council regards it as strategically important public transport corridor where development may be located.
- Electrification of the line has been completed as part of a £160m strategic investment by Scotrail. A substation upgrade is underway and scheduled to be completed in May 2020, will enable greater frequency of service to run. This provides access to the City Centre within 20 minutes. In conclusion, development of Currievale is NOT dependent on future rail investment. That investment is already in place, unlike other greenfield or brownfield choices identified.
- The Spatial Vision diagram highlights a potential public transport corridor from Balerno, through the north of Currie and on to the west of Edinburgh (South Gyle/Edinburgh Gateway). Currievale can deliver a new road/bus route from the A70 Lanark Road West at Newmills Road through to Riccarton Mains Road. This is on land wholly owned or controlled by CALA and can be delivered at an early stage in the development at Currievale.
- A new car and secure cycle parking facility can be delivered adjacent to the existing rail crossing to provide additional parking for Curriehill Station. Bus turning facilities can also be provided. This creates a multi modal public transport/active travel hub. This would deliver one of the key points highlighted for this corridor in the ESSTS.
- Through further discussion with Lothian Buses, we believe there is potential for a new or extended service from Balerno, through Currievale via Curriehill Station and on to Riccarton, Hermiston, Edinburgh Gateway and South Gyle. This would provide a missing link in bus services from the area. This is another key measure identified in the ESSTS that Currievale can assist in delivering.
- These actions would provide direct public transport access to the west of Edinburgh that is currently missing. There is potential for significant modal shift away from the car to public transport with improved bus service and better access to Curriehill Station. Supporting modal shift is a key objective of the Mobility Plan and emerging City Plan.
- Walking and cycling to Curriehill station is currently limited from the existing community. This is because the Currievale site is undeveloped (in current agricultural or Garden Centre use) and acts as a buffer. Development of the site will include additional connections which will increase connectivity and make the station more accessible to the existing community.
- This package of measures can be delivered by the development at Currievale and within the plan period.

The above points were all set out during a meeting with CEC in January 2019 and in the document submitted by CALA as part of that information gathering period.

Currievale is located adjacent to Curriehill Station, is within one of the key corridors identified within the ESSTS and can deliver parts of the Mobility Plan's Spatial Vision. We are unclear why the site was assessed negatively in the Council's Site Assessment. These elements can be delivered in the plan period and do not prejudice any aspect of the wider strategy set out in the Mobility Plan, indeed we see this as a natural extension to the Mobility Plan for a part of the Edinburgh community that has been excluded from the mobility strategy.

Active Travel

Currievale is well connected to existing active travel routes and can deliver additional strategic connections.

- NCR754 is nearby to the North (Union Canal), and NCR75 nearby to the South (Water of Leith). Core Path CEC 17 connects the two cycle routes. Core Path CEC 16 is within the site. A new connection between these two Core Paths can be created through the site. This would also provide access to Curriehill Station. This connection would also provide access to CEC 18 to the south.
- The proposal can also deliver a new connection to Baberton Road from Riccarton Mains Road. This can provide active travel route through to Wester Hailes and Westside Plaza, without the need for significant infrastructure such as a bridge. This is because the route already exists, but would benefit from upgrade.
- The development can also contribute to an improved route to Riccarton along Riccarton Mains Road, namely upgrade of the road and footway to include cycle provision, following realignment (within adopted extent), including street lighting.

Education

We do not agree with the Council's Assessment that there is no education capacity to accommodate the proposed development and no solution available in the plan period. This is inconsistent with conclusions reached for a number of locations where there is no education infrastructure currently available, and does not take account of available capacity and approved extension to Currie Primary School.

- Currie High School is to be replaced with a new school, which it is proposed will be larger than the existing one, increasing capacity from 900 to 1,000.
- The Council's school roll projections indicate that the roll at Currie High School is likely to remain under capacity through to 2029/30.
- Through developer contributions, Currievale can support an even larger new High School (if required). There is sufficient space within the existing High School site to accommodate a larger school. This would ensure that sufficient capacity is available to accommodate the development.

CALA has previously offered land to relocate Currie High School, a location which is closer to the centre of the catchment area. This is still available, if it would assist the build process of the school (avoiding H&S issues) in a more sustainable location for walking/cycling to school.

There is capacity available at Currie Primary School.

- The Council's school roll projections show spare capacity for 99 pupils in 2026/27. This accounts for a recent 4 class extension as Phase 1 of the planned 8 class expansion of this school (as per planning permission 17/05182/FUL. Phase 2 will provide an additional 4 classrooms. This will provide a total of 23 classrooms, providing capacity for a further 100 pupils at least.
- This spare capacity could be utilised by the development at Currievale as an interim measure.
- The proposed development is of a scale (around 900 homes) that could sustain the delivery of a new non-denominational primary school. This could be a 2 stream school which could assist in managing capacity at other schools in the area – for example Nether Currie (which is a single stream school, condition rated C) through catchment rationalization.

Clearly this would be a matter for detailed discussion with the Council's education department. However, there is significant capacity available to accommodate development at Currievale in the interim.

Landscape and Green Belt

Previous assessment (Edinburgh Green Belt Study for SESplan) concluded that the majority of the site was appropriate in terms of landscape impact and Green Belt objectives. The Council's own assessment notes that there are robust boundaries and the site is visually contained and there would be limited impact on landscape character. We agree with this assessment. One of the overhead pylons has been undergrounded. Development can respect required stand off distances. The pylons are not a constraint to development.

Flood Risk

The Council's site assessment concludes that there is no significant flood risk as identified by the SEPA flood map. Flood risk is not a constraint to the proposed development.

Conclusion

In order to provide a suitable range of sites in order to meet the Housing Supply Target for City Plan 2030, we believe that the Council will require to identify and allocate suitable greenfield sites as part of a blended strategy.

CALA owns and controls the land at Currievale. Key infrastructure is already in place or can be delivered by the development within the plan period. This includes public and active travel enhancements and community and education infrastructure.

The proposal can also deliver key transport objectives identified in the ESSTS and the Mobility Plan. It also allows the Mobility Plan to be extended to include the whole of the local community. It can deliver significant benefits to the existing community and encourage modal shift to public transport and active travel.

We believe that the Site Assessment should be reconsidered and as a single site not three separate areas, taking all of the above into account, and that the site should be identified as a preferred allocation in City Plan 2030. We have carried out a revised appraisal, based on the original Site Assessments. This is submitted to demonstrate how the proposal scores against the key criteria.

We would be pleased to discuss greater detail in terms of programming and infrastructure requirements with the Council in the lead up to production of the Proposed Plan.



Choices for Edinburgh City Plan 2030

CALA Response

April 2020



1.1 Introduction

This submission is made in respect of land to the north of Currie, known as Currievale. Currievale comprises land owned and controlled by CALA. It has the potential to deliver a mixed use development comprising around 900 new homes, employment opportunities, community facilities and additional education infrastructure.

Currievale presents an opportunity to deliver a new public and active travel route which can offer a meaningful alternative to car based commuting. Part of this route is already in place through the developments at Newmills and Curriehill Road. Currievale can deliver a route from Lanark Road West and on to Riccarton Mains Road. Additional connections to Baberton Road are possible providing better active travel access to West Edinburgh. The new route can serve as a public transport corridor for bus services to link Balerno and the west and north of Currie to Riccarton, Hermiston and on to South Gyle/Edinburgh Gateway. This would facilitate better access to Curriehill Station with potential for a multi-modal transit hub, additional car and secure cycle parking storage. This would also support increased patronage of the rail line following completion of electrification, addition of extra carriages on the line and scope for future increase in service frequency.

1.2 City Plan 2030 and the City Mobility Plan

The City of Edinburgh Council is consulting on the emerging Local Development Plan (City Plan 2030) and its new Transport Strategy (City Mobility Plan).

The Choices for City Plan documents states that it aims to align with the Mobility Plan. The Edinburgh Strategic Sustainable Transport Strategy (ESSTS) was commissioned by the Council to inform the Mobility Plan.

Currievale lies within Corridor 8 (West of Hermiston Corridor (figure 9-1) as identified in the ESSTS. This is shown in the extract on the following page with Currievale highlighted (Figure 1).

Table 4.1 sets out some of the key opportunities for Corridor 8. These include:

- Significant greenfield land offers potential for transit-led development & urban expansion.
- Opportunities to connect to Heriot Watt, Hermiston Park and Ride and Curriehill Station.
- Opportunity to link with existing tram route (around Edinburgh Park or Bankhead) or for bus-based transit options.

The corridor also benefits from a strong existing attractor in Heriot Watt University, an existing community at Currie and the opportunity for interchange at Curriehill Station. A P&R site is also located at Hermiston Gate (para 9.4). Some of the key objectives are:

ESSTS Objective	Commentary
Sustainable Economic Growth and Development	Improving public transport connectivity between Heriot Watt, Edinburgh Park, the city centre and beyond
Improved equity and social inclusion	Improved public transport accessibility to jobs education, healthcare and leisure for existing residents of Currie.
Reduce transport related carbon emissions	Transit and active travel provision can support high quality streetscape
Improved health, wellbeing and safety	Modal shift and scope to reduce traffic volumes / speed would reduce accidents and emissions

Given the greenfield nature of much of the corridor there are myriad routing options for both bus and tram. The relative merits of routes and modes would fundamentally depend on the location, scale, density and form of development within the corridor. Key consideration would be that:

- From a transit demand perspective, a routing serving Hermiston P&R and offering the best accessibility to and within the Heriot Watt campus should be the aim of option development in this section.
- BRT would be suited to:
 - development patterns more dispersed or along more than one corridor e.g. earlier to serve development corridor west of Heriot Watt and Curriehill station.

- BRT can also be more easily phased i.e. transit infrastructure provided as part of development build-out, and extendable (para 9.10)

Whilst we agree with most of the conclusions reached about the potential to deliver significant transport improvements in the area, we do not agree that improvements cannot be delivered in the plan period. Indeed, development at Currievale can deliver significant improvements within the plan period.

The Mobility Plan builds on the work undertaken in the ESSTS. Reviewing the current City Mobility Plan, there are key objectives with respect to active and public transport travel, including:

- Increase the proportion of trips people make by healthy and sustainable travel modes;
- Reduce the need to travel and distances travelled
- Reduce vehicle dominance and improve the quality of our streets

Corridor 8 is identified as one of the four key transport corridors taken forward into the Mobility Plan and City Plan 2030. Taking this into account, the Mobility Plan sets out a Spatial Vision.

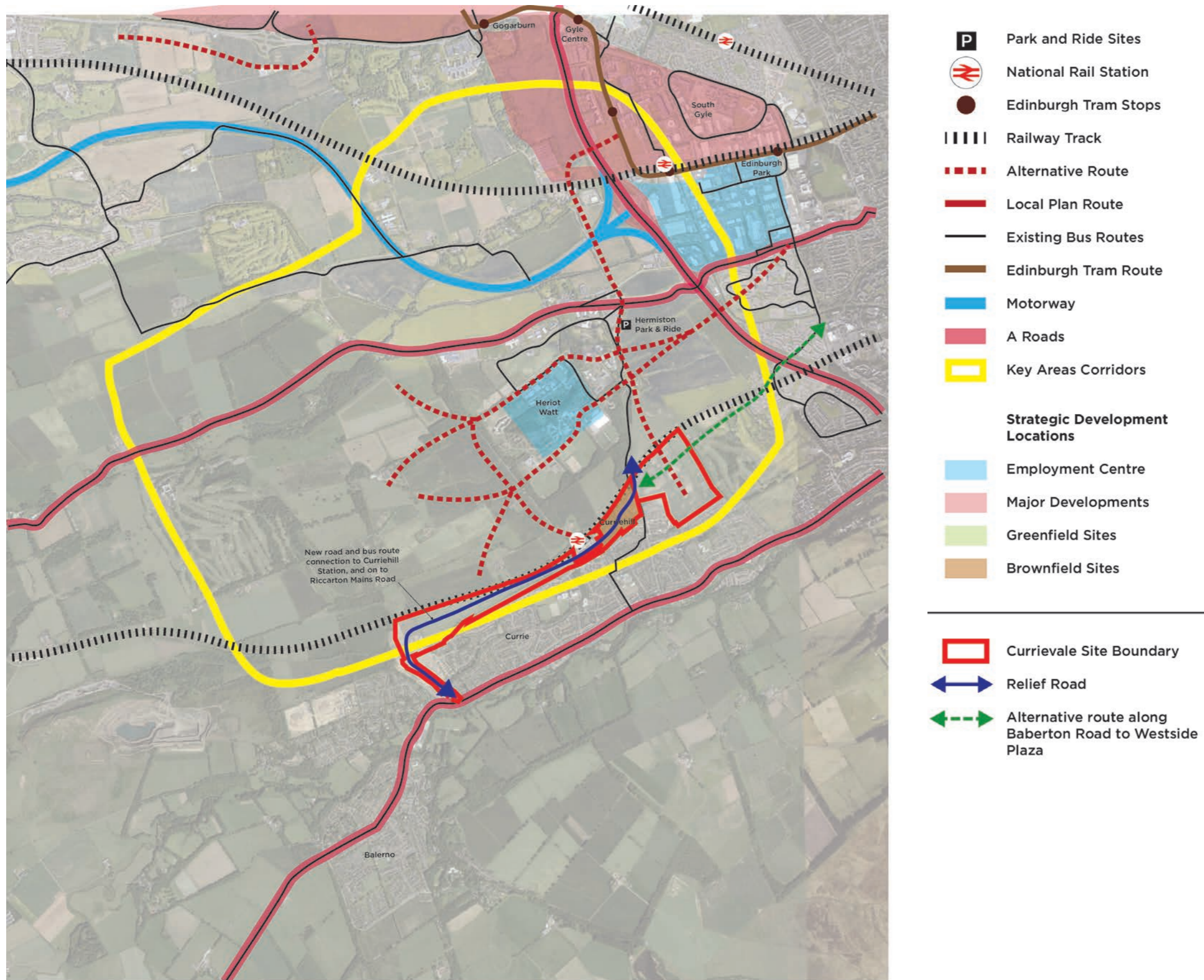
The Vision diagram highlights a new public transport corridor running from Balerno, through Currievale and on to South Gyle/Edinburgh Gateway via Curriehill, Riccarton and Hermiston Park and Ride. The amended version overleaf demonstrates that Currievale can deliver this. This also demonstrates compatibility with the development strategy in West Lothian which seeks to utilise the rail line with strategic allocations near existing stations.

However, land at Currievale has not been identified as part of the potential greenfield or brownfield development options in City Plan.

Curriehill Station and the benefits of greater transport integration are highlighted in the ESSTS and the City Mobility Plan. However, the area identified as Corridor 8 in the Choices for City Plan document does not reflect the full extent of the area assessed as Corridor 8 in the ESSTS. Currievale, and Curriehill Station have been excluded from the diagram in City Plan.

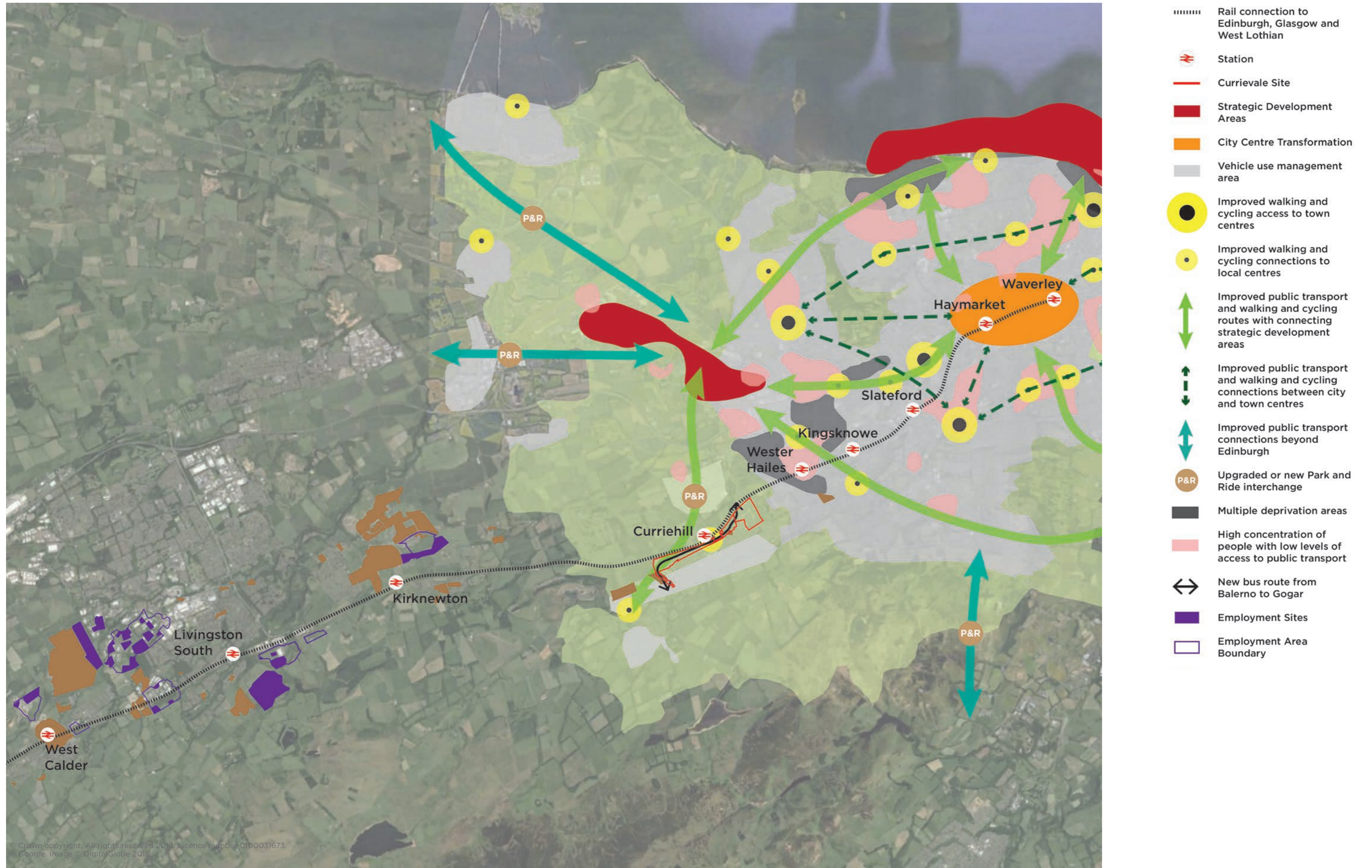
We believe that this is a significant omission from the City Plan, to the detriment of the existing communities along the A70 corridor. Allocation of the land at Currievale is an opportunity to address a number of the issues and deliver associated benefits highlighted in the ESSTS as well as the aims of the City Mobility Plan and its Spatial Vision.

fig. 1: Extract from Edinburgh Strategic Sustainable Transport Study (Corridor 8) with Currievale included



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fig. 2: City Mobility Plan Spatial Vision, Currievale and West Lothian Strategy



1.5 Currievale: Site Assessment

The site, or component parts of it, has been assessed by the Council as set out in the Housing Land Background Paper. The Council has not assessed the development proposed.

The Assessment takes account of the following factors:

Location within Strategic Development Area; Proximity to employment; Public Transport/Active Travel; Education Capacity; Landscape Capacity and Flood Risk; leading to an overall conclusion on the suitability of the site.

CALA has significant concerns with the Assessment carried out by the Council, and the consistency of scoring between candidate sites. This is set out in more detail in the attached Site Selection Comparison and re-appraisal of Currievale, as well as in the sections below.

It is noted that Currievale is not located within one of the Strategic Development Areas identified in SESplan (2013). However, it is important to note that Ministerial approval of SESplan in 2013 was subject to Supplementary Guidance being prepared to identify a Housing Target to be identified for each constituent authority area. The SDAs were already set in the approved SESplan document, before the Housing Target for each area was agreed.

In order to prepare the Supplementary Guidance, a refresh of the Spatial Strategy was undertaken. The Background Technical Paper states, "The revised Spatial Strategy Assessment identifies two assessment areas that whilst not identified as SDAs, have the potential to accommodate development on a strategic scale, North West Edinburgh (Area 9) and South West Edinburgh (Area 11). An assessment of potential opportunities and constraints has been undertaken to inform the Supplementary Guidance and this suggests that these areas could accommodate around 2,500 units if housing land is required outwith SDAs (para 5.20).

Currievale lies within Area 11 (South West Edinburgh). Within the Updated Spatial Strategy Assessment, the only areas with development capacity noted were those identified in Stage 2 of the SESplan Green Belt Assessment - "north of Currie and small scale extension north of Balerno (27) and limited landscape capacity for development at Juniper Green and Currie and N of Currie (31). No landscape capacity in other two areas.

Whilst Area 11 is not formally identified as one of the SESplan SDAs, there is no doubt that the suitability of the area to accommodate strategic development has been established in the Updated Spatial Strategy Assessment to inform the Supplementary Guidance, and that through that process there is support for development at Currievale.

Looking at the Council's Assessment of sites, it is evident that the Council has scored Currievale higher than some of the candidate sites it has identified at Kirkliston, East of Riccarton and Calderwood. This leads to questions over the Assessment process if a site is identified as a preferred option, where it has scored unfavourably to other sites that have not been identified.

1.3 Transport

The area benefits from a rail station at Curriehill, along with frequent bus services by way of the 44, X44 and 45 services.

However, the Council has scored the site's accessibility to public transport as negative. We believe that the site's accessibility to public transport in terms of existing and the measures we have proposed (as set out in our pre-Choices Paper submission document), should be scored as a positive. This is explained in more detail below.

The rail service serves Haymarket and Waverley, as well as South Livingston and Glasgow. Electrification of the line has been completed and additional carriages are now running on existing services. A planned substation upgrade in May 2020 will enable additional services to be added on the line. Edinburgh City Centre is within 20 minutes by rail from Curriehill Station. There is capacity on existing services. There is no requirement for additional funding.

Scotrail has noted that improving accessibility to the station is the key to improve patronage. This can be achieved by delivering new parking facilities for cars, secure bicycle parking and a bus stop/turning area if required on land at Currievale. CALA has engaged with Scotrail on the ability of the line to accommodate more frequent services as well as the proposals to improve accessibility to the Station. Scotrail has indicated support for measures to improve accessibility to the station.

As is noted in the ESSTS, bus services in the area serve only limited locations. Datashine: Commute (although based on Census 2011) confirms that the most popular commuting destinations (outwith the Currie/Balerno area itself and home working) are:

- South Gyle
- Old Town, Princes Street and Leith Street
- Ratho, Ingliston and Gogar
- Deans Village
- Tollcross
- Broomhouse and Bankhead

Accessibility to key employment locations by public transport is relatively poor considering South Gyle, Edinburgh Park, Hermiston and the Airport are all within 5km. Balerno is only served by the 44 service which runs through Currie and Juniper Green along the A70 and serves Dalry, Haymarket, West End, George Street, York Place, London Road and on to Wallyford in East Lothian. The 45 serves Curriehill Road and the east of Currie and Juniper Green. It runs from Riccarton, Hermiston, through the east of Currie and on to Laurieston, Old Town and East of Princes Street via North Bridge and finally on to Queen Margaret University in East Lothian.

With limited direct bus links, and bus journeys to other relatively nearby locations potentially requiring two or three changes, it is little surprise that the census data confirms the predominance of car based commuting in the area. There is no credible alternative for many commuters. This leads to congestion along the A70 in peak periods.

The ESSTS notes that there is significant potential to deliver an improved range of services in the area. Based on the above existing bus services, opportunities for development at Currie to support / contribute towards improved services are likely to be associated with the following services:

- Access to the city centre – extension to Lothian Buses service 45
- Access to employment in the west of Edinburgh – Extension to Lothian Buses 63
- New bus service from Balerno to Edinburgh Gateway.

The latter service would also offer a link to Hermiston Park & Ride where further city centre bus services are available. Currievale supports the strategy of improved bus services along the Currie to Hermiston corridor.

Improvement of public transport accessibility from Balerno and Currie to key employment locations in the west of Edinburgh has the potential to realise significant modal shift from the car and on to public transport.

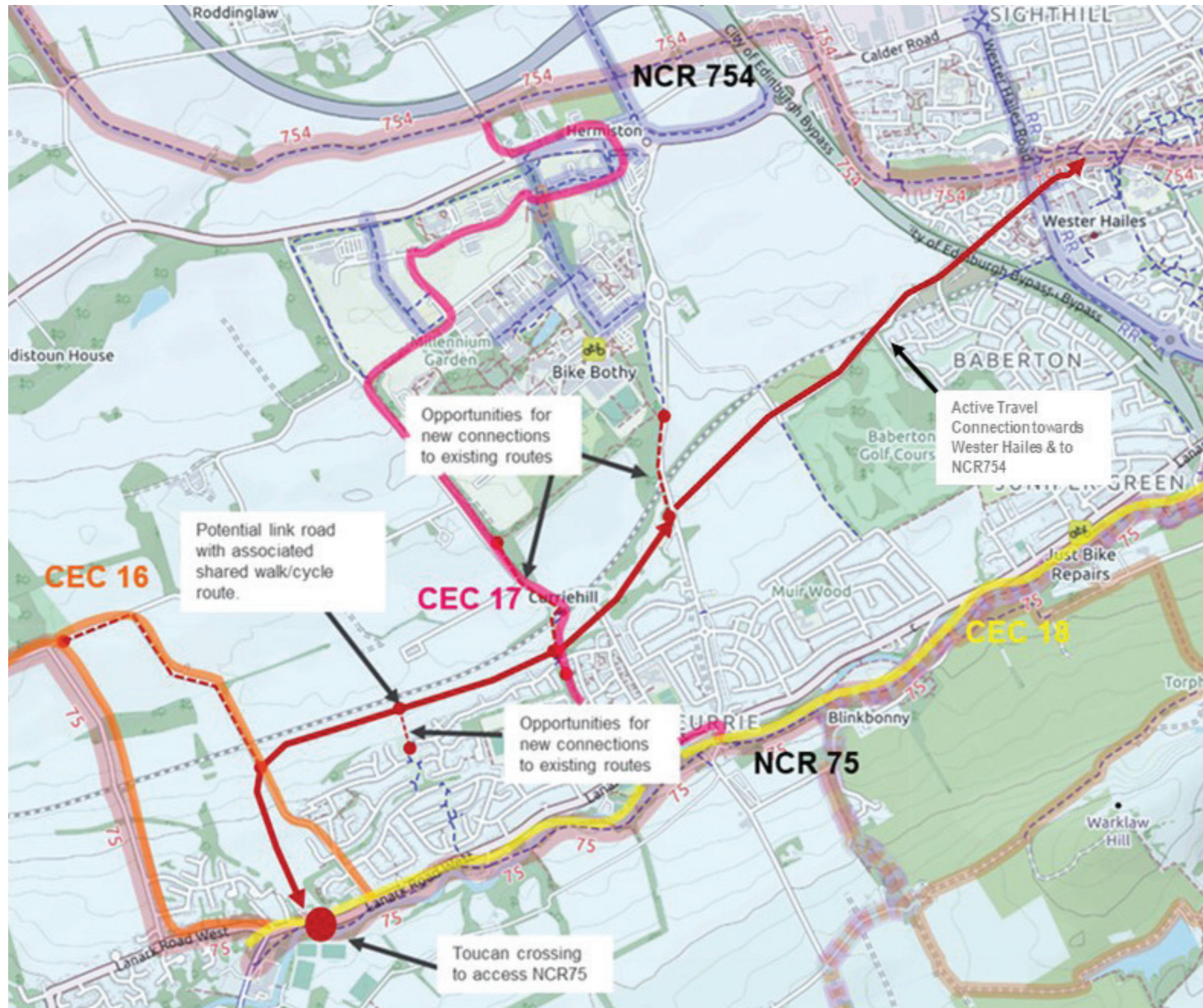
Currievale can support the delivery of extended or new bus services through the delivery of the new public transport route through the site. This supports the Spatial Vision of the Mobility Plan.

The route would provide better access to Curriehill railway station, which can offer a potential location for an interchange for all modes of travel. This also allows for better walking and cycling connections to the rail services which offer high speed public transport links to the city centre and to Glasgow.

1.4 Active Travel

In keeping with the Council's Spatial Vision, the development of the site can facilitate better active travel connectivity with connections through the site and financial contributions towards offsite improvements. This would ultimately create an active travel corridor between Currie and the west Edinburgh employment centres. The opportunities are demonstrated in the Figure adjacent.

fig. 3: Active travel opportunities related to Currievale



1.6 Education Infrastructure

The majority of the site is within the catchment area for Currie High School and Currie Primary School.

The Council has assessed that there is a lack of education capacity to accommodate development at Currievale. Current roll projections show that there is capacity at Currie High School, before even taking account of the fact that the replacement school (due to be built in 2024) will have more capacity than the existing school that it will replace. There is also some capacity at Currie Primary School which is shown to have a declining roll, and the second phase of an already approved extension (planning permission 17/05182/FUL for an 8 class extension increasing the school to 23 classes) still to implement.

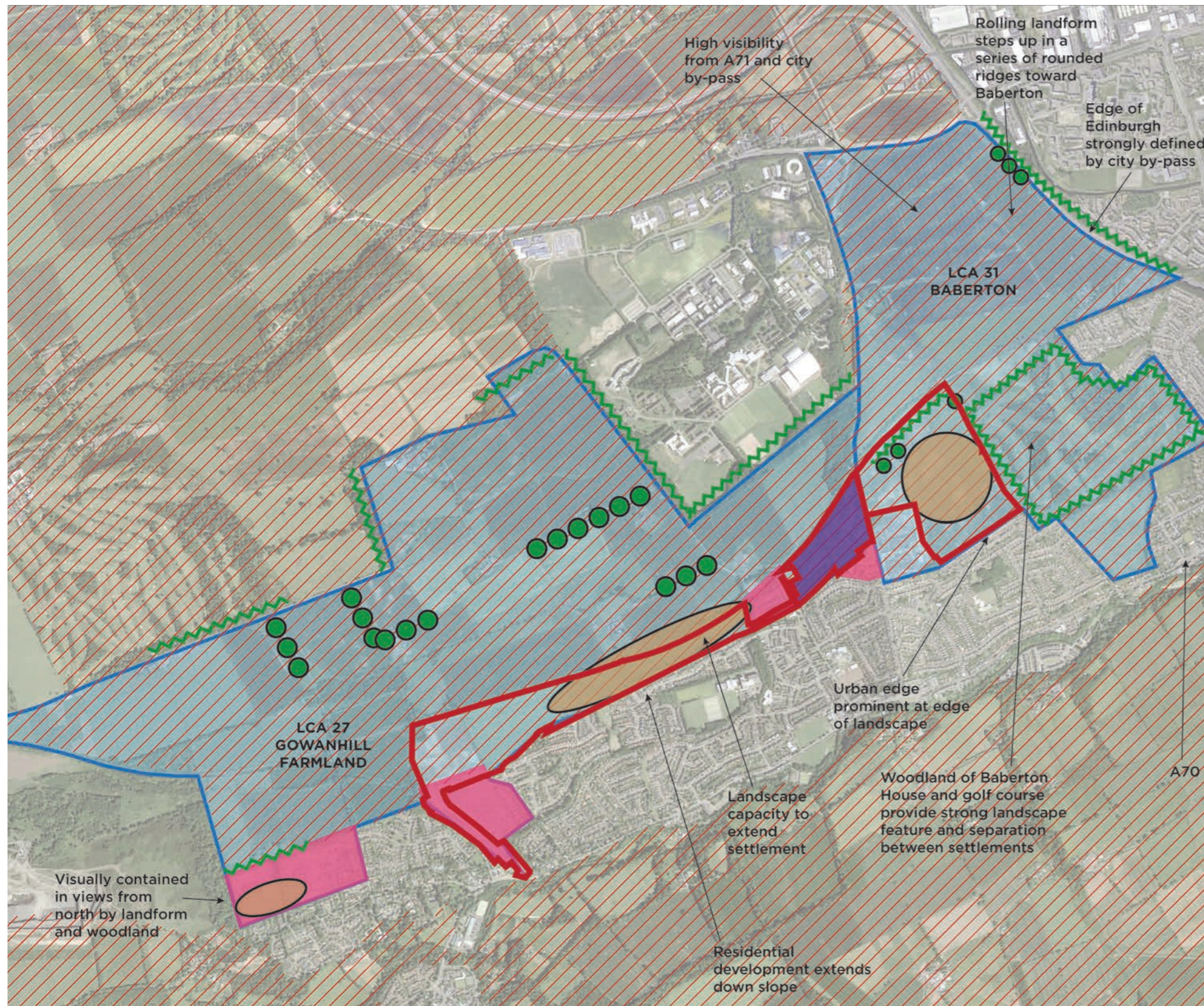
However, in certain situations, for example Kirkliston and South East Edinburgh, lack of existing schools and capacity is not noted as a constraint to development. The Council's approach to assessing education in the Site Assessment is not consistent.

In the short term, the available capacity at Currie Primary School could be utilised to accommodate the development. In the medium term, the second phase of the already approved extension can be implemented provided four more classes (increasing capacity by 100 pupils). In the longer term, development at Currievale is of a scale that could sustain a new Primary School if required. This could be delivered on land within CALA's control. Through a future catchment review, the new Primary School could assist in managing accommodation pressures across Balerno, Currie and Nether Currie.

The new High School will provide additional capacity. It is known that the Council has considered selling part of the western area of the existing school campus to raise additional funds to deliver a school larger than the current one (increase capacity from 900 to 1,000). The Council's Wave 4 Infrastructure Investment Outline Business Case Document noted that this could raise £4.8 million (para 3.15). The surplus land confirms that there is scope to accommodate a larger school. Development at Currievale could assist in delivering additional capacity through developer contributions which may be necessary to accommodate future growth in pupil numbers. There is sufficient space within the site to accommodate a school with capacity for 1,200 pupils.

This is clearly a matter for further discussion with the Council, but is evident that Education infrastructure is not a constraint to development at Currievale and solutions are either in place or can be delivered within the plan period.

fig. 4: Landscape Impact, Green Network and Green Belt



1.7 Landscape Impact, Green Network and Green Belt

The Edinburgh Green Belt Study (Stage 2) carried out to inform SESplan identified the majority of the site as having landscape capacity to accommodate development. This included land to the north of Currievale and east of Riccarton Mains Road. Since then, development has commenced at Newmills Road (HSG 37) and completed at Curriehill Road (HSG 36) and Riccarton Mains Road (HSG 35), all areas that were not identified within the Green Belt Study.

These developments bookend Currievale. The rail line provides a strong Green Belt boundary. Development is contained to the south of the rail line, and visually relates to existing settlement. Development of the site would have very limited impact on landscape character of the area, with strategic landscaping to provide appropriate urban/rural transition.

Overhead powerlines are not a constraint to development. One of the pylons has been undergrounded. The proposal has been developed to take account of appropriate stand off distances. The pylons at Currievale are no more of a constraint to development than at South East Edinburgh which has been more favourably assessed by the Council.

In terms of the Green Network, the Council's Assessment states that "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 the NCN75 cycle route and Currie". It is agreed that the site is considered of value to the green network.

In summary, the site has landscape capacity to accommodate development as confirmed in the Edinburgh Green Belt assessment.









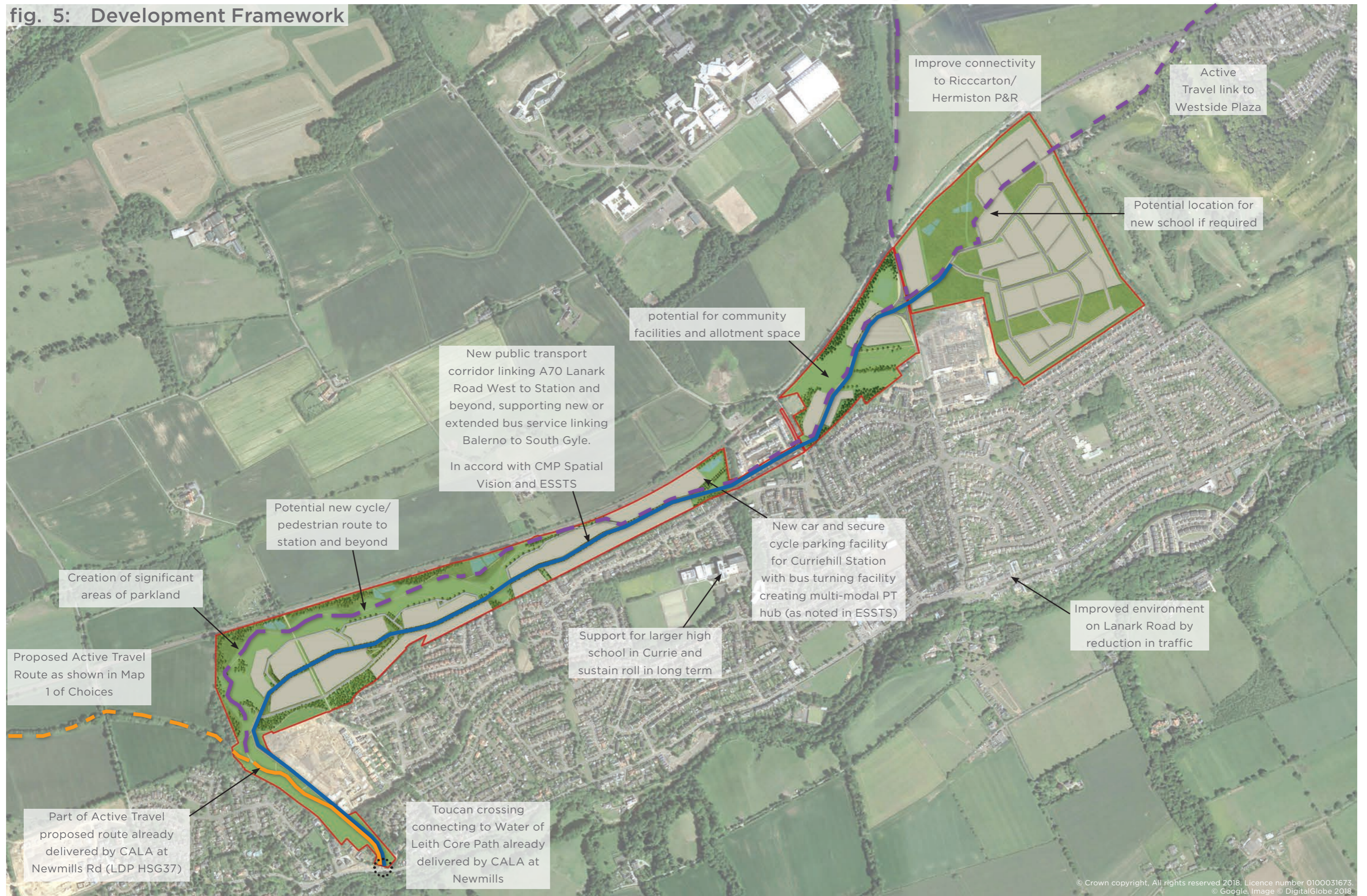
-  Green belt
-  Landscape character area
-  Potential FHN link or landscaping
-  Strong containing edge
-  Landscape capacity for development
-  Brownfield site
-  Development site under construction
-  Currievale Site

fig. 5: Development Framework



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1.8 Conclusion

CALA owns and controls land at Currievale. The ownership of the land means that CALA is in a position to deliver significant infrastructure to support this development early in the plan period.

The proposed development at Currievale:

- Although we believe that the Site Assessment for Currievale is inaccurate, we note that Currievale already scores higher than sites identified as preferred options in the Council's Site Assessment;**
- Aligns with the City Mobility Plan's Spatial Vision;**
- Can deliver key public transport and active travel enhancements within the plan period;**

- Can encourage and facilitate modal shift from car to public transit and active travel;**
- Can co-exist with other potential developments east of Riccarton Mains Road to deliver further public transport and active travel routes;**
- Can deliver new community infrastructure – scope to deliver a new primary school if required and support for a larger High School in Currie;**
- Deliver around 900 new homes including a range of new homes from smaller apartments to family homes.**

This submission has demonstrated that the proposal can assist the Council in delivering key aspects of the Mobility Plan's Spatial Vision within the plan period. The proposal complies with and supports the key objectives of the Mobility Plan and the aspirations for City Plan.

As stated previously, the site has been subject to Environmental Assessment and public consultation. The Council can therefore consider identifying the site as a preferred allocation for the Proposed Plan.

CALA would be pleased to meet with the Council in the coming months to establish the infrastructure requirements for the site and a delivery programme as the Proposed Plan is being developed.

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