

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **1 A**

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

Short Response

Explanation It is well known that green spaces have both environmental and social benefits and are fundamental for health, wellbeing and local biodiversity. One of the main barriers of receiving all the benefits from green infrastructure the lack of connectivity between existing green spaces. New development can significantly impact or remove existing connections and as such, it is vital to ensure that new developments connect to this network. The Masterplan and associated cover letter attached to these representations highlights how the proposal at Balerno would provide a development which includes green infrastructure as a fundamental element to the development. The integration of high-quality green infrastructure would allow the site to provide much needed housing, while also being fully connected to the green network.

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 As discussed above, green (and blue) infrastructure is fundamental, both on an environmental and social level. The Masterplan Framework enclosed within these representations illustrates that the site is capable of delivering extensive high-quality multi-functional green infrastructure and open space framework linked to existing GI networks which will provide a strong sense of place and a valuable recreational and habitat resource.

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Choice **1 C**

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

Short Response

Explanation

Choice **1 D**

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

Short Response

Explanation

Choice **1 E**

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

Short Response

Explanation

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On behalf of:

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

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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 Yes.It was reported in Edinburgh Evening News in August 2018, that figures obtained via freedom on information legislation found both Portobello and Queensferry cemeteries are estimated to be completely full in the next 2-3 years. The request also revealed that it is expected that Corstorphine Hill, Craigmillar Castle Park, Rosebank and Saughton cemeteries to be full in around 4-5 years.Given the size of the promoted site in Balerno, and the extent of green/wooded spaces proposed, there is the potential to include cemetery provision within the scheme.

Choice **1 H**

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

Short Response

Explanation

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Choice **2 A**

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

Short Response

Explanation It is crucial that new developments have regard to climate change adaptation and measures to address accessibility for people with varying needs. This is to ensure both the longevity of new developments as well as their practicality for future users. The site and associated development which have been brought forward as part of these representations will be fully supported by a comprehensive design and access statement.

Choice **2 B**

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

Short Response

Explanation The consultation document states that across the city, on both urban area and greenfield sites, housing development must achieve a minimum of 65 dwellings per hectare. While it is important to achieve appropriate densities for new development, the Council also need to appreciate that a range of other factors need to be taken into consideration. The overall character of the area should be understood prior to adding prescribed densities to developments. For example, the site which has been brought forward as part of these representations is rural in nature and the prevailing character of the surrounding urban area is that of low-density housing. Any development in this area would need to be sensitive to the surrounding area and high-density housing would conflict with the overall character of the area. Furthermore, regard should be had to the existing infrastructure available in the area. The proposal which has been brought forward at Balerno has carefully considered the existing infrastructure in the area and has also included additional infrastructure provision. As such, an appropriate density has been illustrated which would generate a population supported by existing and proposed infrastructure. Applying significantly higher densities to this scheme, would have a detrimental impact on the existing infrastructure and it would be unlikely that the proposed infrastructure would also be able to support the additional population. Therefore, it is clear that while sites should not be under-developed, densities should be reflective of the general character of the area and level of infrastructure capacity in the wider area.

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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 In order to support the Councils aims to 'create places for people, not cars' and 'support the reduction in car use in Edinburgh', it is fundamental that new developments ensure their layouts deliver active travel and connectivity links. The indicative Masterplan attached to these representations indicates that the proposal would offer safe and attractive routes for walking and cycling. As indicated on the masterplan, the site will accommodate a new cycle/ footway, providing a direct connection to the linear park to the south east of the site and into the centre of Balerno.

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 As discussed through the answers provided for 'Choice 1' it is well known that green spaces have both environmental and social benefits and are fundamental for health, wellbeing and local biodiversity. Accessible and well-designed public realm can also have a substantial positive impact on the social aspects of new schemes. As such, it is important for new schemes, where appropriate, to deliver high quality open space and public realm. The site and indicative proposal which has been submitted as part of these representations has the ability to provide a scheme which is fully supported by public realm and significant open space. High quality public realm will be fully integrated into all aspects of the scheme and will also provide an area of community space central to the scheme. As depicted on the masterplan, the design has also provided large areas of open space which will benefit not only those within the development but also the wider community of Balerno.

Customer Ref: 00650 Response Ref: ANON-KU2U-GFWV-1

Name Hannah Mitchell

Response Type Agent / Consultant

On behalf of: Town & Country Properties (GB) Ltd

Supporting Info

Email hannah.mitchell@rapleys.com

Choice 3 A

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

Short Response Not Answered

Explanation Not Answered

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 Not Answered

Explanation Not Answered

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 Not Answered

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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 In order to create sustainable communities, it is essential that there is sufficient infrastructure capacity to support the development. Where appropriate, it is also important for schemes to recognise where there are existing deficiencies in infrastructure and provide additional infrastructure provision to benefit the wider community. The proposal which has been brought forward as part of these representations, would be fully supported by a new healthcare facility, community hub, active transportation links and would be served by an extended public transportation link. While the proposal does not directly offer educational facilities, it is proposed that the high-quality open space could be utilised by existing schools in the area in order to ease pressure on existing school sites. A full response can be found within the cover letter attached to these representations.

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 In order to maximise the accessibility of community facilities and also support the Councils objective of encouraging active travel, it is important to ensure that facilities are well connected to active travel routes and sustainable public transport services. As outlined above, the proposal at Balerno would provide a range of community facilities and infrastructure. The indicative masterplan highlights how these facilities will be easily accessible by active transport modes, by both those living within the development site and the wider community of Balerno. Furthermore, the proposed extension of the existing bus route would alight within the centre of development site, allowing easy access to all the facilities provided by the scheme.

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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

Short Response

Explanation

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

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Response Type

On behalf of:

Supporting Info

Email

Choice 5 E

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

Short Response

Explanation

Choice 6 A

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

Short Response

Explanation In order to meet the Council's ambitions of increasing active travel and reducing care use, it is important that new development is sustained by public transport and high-quality active transport routes. As outlined within the cover letter attached to these representations, the proposal brought forward as part of these representations will be fully supported by integrated active travel routes and an extension to existing public transportation in Balerno.

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

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On behalf of:

Choice **7 A**

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

Short Response

Explanation

Choice **7 B**

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

Short Response

Explanation

Choice **7 C**

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

Short Response

Explanation

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Response Type

On behalf of:

Supporting Info

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Choice **7 D**

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

Short Response

Explanation

Choice **8 A**

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

Short Response

Explanation

Choice **8 B**

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

Short Response

Explanation

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On behalf of:

Supporting Info

Email

Choice **8 C**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

Choice **9 A**

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

Short Response

Explanation

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Choice **9 B**

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

Short Response

Explanation

Choice **10 A**

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

Short Response

Explanation

Choice **10 B**

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

Short Response

Explanation

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On behalf of:

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Choice 10 C

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

Short Response

Explanation

Choice 11 A

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

Short Response

Explanation As outlined in the cover letter attached as part of these representations, it is acknowledged that there is a high level of demand for housing and an even higher need for affordable housing in Edinburgh. As such, it is crucial that new developments contribute towards the provision of affordable homes in Edinburgh. However, it is just as important to ensure that developments are viable and deliverable so that permissions can be built out and contribute to the housing provision. The proposed scheme attached to these representations offers 30% affordable housing which is 5% higher than currently required in policy. A full justification for this figure is set out in the attached cover letter.

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

Customer Ref: 00650

Response Ref: ANON-KU2U-GFWV-1

Supporting Info

Name Hannah Mitchell

Email hannah.mitchell@rapleys.com

Response Type Agent / Consultant

On behalf of: Town & Country Properties (GB) Ltd

Choice 12 A

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

Short Response Option 3 (Blended)

Explanation Please see attached cover letter for a full response to this question.

Choice 12 B1

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

Short Response Not Answered

Explanation

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 Not Answered

Explanation

Customer Ref: Response Ref:

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Response Type

On behalf of:

Supporting Info

Email

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

Customer Ref:

00650

Response Ref:

ANON-KU2U-GFWV-1

Supporting Info

Name

Hannah Mitchell

Email

hannah.mitchell@rapleys.com

Response Type

Agent / Consultant

On behalf of:

Town & Country Properties (GB) Ltd

Choice 12 B6

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

Short Response

Not Answered

Explanation

Choice 12 B7

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

Short Response

Not Answered

Explanation

Choice 12 B8

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

Short Response

Not Answered

Explanation

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Response Type

On behalf of:

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

Customer Ref: Response Ref:

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Name

Email

Response Type

On behalf of:

Choice 12 C

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

Short Response

Explanation

Choice 12 C

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

Short Response

Explanation

Choice 12 C

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

Short Response

Explanation

Customer Ref: Response Ref:

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Response Type

On behalf of:

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Email

Choice 12 D

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

Short Response

Explanation

Choice 13 A

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

Short Response

Explanation

Choice 14 A

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

Short Response

Explanation

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Choice **14 B**

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

Short Response

Explanation

Choice **14 C**

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

Short Response

Explanation

Choice **15 A**

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

Short Response

Explanation

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Response Type

On behalf of:

Choice 15 B

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

Short Response

Explanation

Choice 15 C

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

Short Response

Explanation

Choice 15 D

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

Short Response

Explanation

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On behalf of:

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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

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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:

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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

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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

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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

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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

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Email

Response Type

On behalf of:

Choice **16 EX**

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

Short Response

Explanation

Choice **16 F**

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

Short Response

Explanation

Choice **16 G**

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

Short Response

Explanation

Customer Ref: 00650 Response Ref: ANON-KU2U-GFWV-1

Name: Hannah Mitchell

Response Type: Agent / Consultant

On behalf of: Town & Country Properties (GB) Ltd

Supporting Info:

Email: hannah.mitchell@rapleys.com

Choice 16 H

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

Short Response: Not Answered

Explanation: Not Answered

HJM/19-02280

26 March 2020

City Plan team
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By email only: cityplan2030@edinburgh.gov.uk

Dear Sir or Madam

City of Edinburgh Council 'Choices for City Plan 2030' (Winter/Spring 2020) Consultation

Representations on behalf of Town & Country Properties (GB)- Land Beside Ravelrig Road

On behalf of our client Town & Country Properties (GB) Ltd, please find enclosed our representations to the City of Edinburgh 'Choices for City Plan 2020' (Winter/Spring 2020) Consultation. This letter is in response to Question 12C of the online consultation form which asks, 'do you have a greenfield site you wish us to consider in the proposed Plan?'. Through this response we seek to bring forward a site at Land Beside Ravelrig Road for mixed use development which would include housing, community facilities, extensive green space and enhanced public transportation.

Land Beside Ravelrig Road is the site subject to these representations. The site extends to approximately 84 acres (34ha) and lies east and west of Ravelrig Road, Balerno. Balerno itself is a suburb of Edinburgh approximately situated 8 miles west of the City Centre. The site comprises arable fields though is bisected by a green corridor which is the route of the former Balerno branch railway line. There is also a high voltage electricity transmission line crossing the northern portion of the site.

To the south of the site is residential development 'Ravelrig Heights' (existing housing allocation HSG 38). To the west is a tree-belt and to the north of the site it is bounded by the Edinburgh – Glasgow railway line. Arable fields are also present to the east of the site. However, to the south-east is the 'Kingfisher Park' residential development (housing allocation HSG37) which is also currently under construction. Therefore, it is clear that the site context is changing as a consequence of the new residential development now abutting the site.

These representations follow the structure of the Choices for City Plan 2030 document and explore the most relevant sections including an assessment of the proposals against National Planning Framework 3 (NPP3) and Scottish Planning Policy (SPP).

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

The explanatory text for Choice 1 cites that in order to make Edinburgh as sustainable as possible, 'the green and blue environment should be a fundamental element of all development in Edinburgh.'

The rural nature of the site has been carefully considered throughout the design process of the project. The Masterplan Framework enclosed within these representations illustrates that the site is capable of delivering extensive high-quality multi-functional green infrastructure and open space framework linked to existing GI networks which will provide a strong sense of place and a valuable recreational and habitat resource.

Paragraph 51 of the SPP sets out that 'the spatial form of the green belt should be appropriate to the location... Local development plans should show the detailed boundary of any green belt, giving consideration to establishing clearly identifiable visual boundary markers based on landscape features, such as rivers, tree belts, railways or main roads.'

The land at Ravelrig Road appears to offer a further and natural extension to Balerno, particularly given that it is bounded on the north by the railway line which creates a physical defensible boundary for any development beyond. The proposed cycle/footpath route will allow a multi-functional green buffer between the boundary of the built-up area and the railway line, mitigating any impact of the development on the wider Green Belt.

Any application will be fully supported by thorough landscape proposals which will seek to enhance the biodiversity of the site while also adding to the rural character of the area. The trees which surround the site will be retained to provide containment from the existing development to the south as well as reducing the visual impact from the north and reinforcing the boundary between the urban extent of Balerno and wider Green Belt. The attached masterplan indicates substantial areas of enhanced woodland which will be concentrated around the development boundaries to strengthen the separation between the site and wider countryside.

Map 1 of the City Plan 2030 highlights the former railway as an active travel route through the site. The preliminary Masterplan indicates that this active travel route will be formed and fully integrated into the development proposal and will provide a valuable connection to the surrounding countryside and into central Balerno.

Choice 1 also indicates that the council wish to identify specific sites for new allotments, food growing and cemetery provision. Given that the site is very large, and the area of land allocated for greenspace, there is scope to accommodate these types of measures within the development proposal, which can be delivered in the early stages of the Plan period.

It is noted that the Council's website indicates that all allotments in Edinburgh have a waiting list. This clearly indicates both the demand for allotments and the need for new provision within the area. The attached Masterplan highlights an area for community allotments into the design which is well connected to the wider site and the neighbouring Kingfisher Park development.

Given the above discussion, it is considered that development at Ravelrig Road would have the ability to provide a development which includes green infrastructure as a fundamental element while strengthening the boundary between the site and the wider green belt, in accordance with SPP.

Choice 5 - Delivering Community Infrastructure

Choice 5 of the City Plan 2030 states that 'our homes and businesses need investment in our community infrastructure. We need schools, healthcare facilities, and access to public transport and active travel options.'

The SPP introduces a presumption in favour of sustainable development that contributes to sustainable development and this includes improving health and well-being by offering opportunities for social interaction and physical activity.

It is acknowledged that any development at the site will increase the wider population of Balerno and therefore due consideration would need to be had on the potential impacts the circa 300 dwelling proposal could have on community infrastructure. Scottish Government statistics indicate that the City of Edinburgh has an average of 2.13 people per dwelling (based on 2018 figures) and therefore the proposal has the potential to create a population increase of around 640 residents. There have been two recent significant housing developments in Balerno which are adjacent to the development site; 'Ravelrig Heights' and 'Kingfisher Park'. Using the same assumptions regarding average number of people per dwelling, these developments could produce a population increase of around 740 residents.

The masterplan framework included with these representations indicates that the site will be able to accommodate a Doctor's Surgery which will be of a benefit to the new residents and also the wider community. As existing, there is no surgery in Balerno and the nearest doctor's surgery to the site is The Pentlands Medical Centre, located approximately 2 miles to the east of the site in Currie. ISD Scotland released data in January 2020 regarding 'GP Workforce and Practice Populations', which indicated that there are currently 14 GPs who work at the centre and the surgery holds a patient list size of 13,732. It is anticipated that the current list size of The Pentlands Medical Centre will rise with the growing population in Balerno.

The 2018 report 'General Practice- GP Workforce and practice list sizes 2008-2018' published by ISD Scotland indicates that the average practice list size for Scotland is 6,000. While it is acknowledged that due to varying population sizes in Scotland, the average practice list for Scotland is a limited measure, it is clear that The Pentlands Medical Centre serves a large and growing population. Given this, and that there is no existing medical facility in Balerno, it is considered that the proposal will meet a rising demand within the area, to the benefit of the wider community.

There are three schools within Balerno which are all located to the south of the site and there are four schools in Currie to the east. The 2019 report 'The School Place Challenge 2019' published by Scape Group states that Edinburgh City Council will need 'an additional 47 classrooms as pupil numbers will climb 7.5% by 2020/21'.

The report cites 'offsite construction' as one of three recommendations moving forward to mitigate the rising pupil populations. It states that 'the adoption of offsite construction as the main method of building for all new schools and extensions would mean that they are built quicker than by using traditional methods. If modular can grow in scale, building schools will become more efficient and cost-effective.'

While the masterplan framework does not allocate any of the development site for education, given the expansive green space indicated on the plan, there is the opportunity for, the green spaces to be used by schools within the area for sport. It is anticipated that this would ease pressure on existing school sites and allow more space for modular class rooms.

Choice 5 of the City Play 2030 propose to 'direct development to where there is existing infrastructure capacity, including education healthcare and sustainable transport, or where potential new infrastructure will be accommodation'.

As discussed above, there is the potential for the site to positively contribute towards the healthcare and education facilities within the area. The developer has also liaised with the local bus operator (Lothian Buses) to divert the exiting 44 bus service (Balerno to Wallyford via the City Centre) service into the site which would

offer a sustainable means of transport for all future residents and visitors and this is indicated on the masterplan framework. A toilet block would also be provided on site for the bus operator employees and visitors of the bus interchange.

The site would also offer safe and attractive routes for walking and cycling. As indicated on the masterplan, the site will accommodate a new cycle/ footway, providing a direct connection to the linear park to the south east of the site and into Balerno.

It is therefore considered that the proposal would create a self-sustaining development with additional healthcare services, community areas and facilities and public transportation which will be of benefit to the wider population in accordance with SPP. The proposal would meet the aims of Choice 5 of the consultation document and this should be considered a significant material consideration when assessing the suitability of the site for allocation.

Choice 6 – Creating places that focus on people, not cars

Choice 6 cites that the Council want to 'create places that focus on people not cars and priorities public transport, walking and cycling to encourage active and healthy lifestyles'.

As discussed above, the masterplan highlights that the site has the ability to accommodate a new Bus Hub which will allow the existing number 44 bus route to be integrated into the site. This will be a significant benefit to the new community and will also allow visitors to travel sustainably to the site.

The masterplan also indicates that the development will utilise existing Green Infrastructure links to encourage people to walk and cycle. As discussed above, the site will provide attractive and safe routes for those who choose to travel using modes of transport other than cars.

It is also considered that by focusing community facilities within the strategic site, will allow all residents to use active transport to travel to these destinations. This includes an extensive range of green spaces, multiple play areas, links to existing cycle/ footpath connections, a community hub and bus terminal.

As such, it is clear that this site will be able to provide an opportunity to create a place with focuses on people and not cars, in line with the objectives of Choice 6 of the City Plan 2030.

Chapter 7- Supporting the reduction in car use in Edinburgh

This Choice outlines that 'where there are good public transport options, an environment that supports walking and cycling and access to car club vehicles or other shared mobility scheme, there is less need to own a car.'

As outlined above this scheme will include well connected public transport options and will encourage walking and cycling.

Choice 8 - Delivering new walking and cycling routes

Choice 8 states that the Council will seek to deliver 'walking and cycling routes across the city will be key to delivering both our aim of not needing a car to move around the city and our aim of Edinburgh being a green, connected city.'

Again as outlined in previous sections of this document, the proposal will deliver and encourage enhanced and new walking and cycling routes within the site which will connect to the wider area.

Choice 11 - Delivering more affordable homes

It is stated through Choice 11 of the that the Council are aspiring to deliver the target of 20,000 'affordable homes in the most efficient way, within mixed sustainable communities, whilst minimising green belt release'. SPP states that 'plans should consider how affordable housing requirements will be met over the period of the plan'.

The 2020 Housing Study indicates that there is a high level of demand for housing and an even higher need for affordable housing in Edinburgh. The report recognises that 'the plan must be deliverable therefore there must be a balance between the desire to maximise the amount of affordable housing provided through the market and the viability for developers to provide this.'

It is acknowledged that the explanatory text indicates that the Council wish to meet their affordable housing targets whilst minimising green belt release. However, given that the site is green field, it has limited constraints to development or delivery, especially when compared with brownfield sites. It is therefore considered that the site has the ability to come forward quickly to positively contribute to the affordable housing need in Edinburgh and this is discussed further in the next section of the report.

The proposal at Land beside Ravelrig Road would constitute a mixed community with 30% affordable housing. Though this is lower than the proposed target of 35% in the City Plan, it is higher than the current 25% requirement set out in The Edinburgh Local Development Plan (2016). The figure of 30% affordable housing has been obtained through a thorough assessment of the site to determine the viability of future development which confirmed that that the site is deliverable with this level of affordable housing. It is considered that while the figure of 30% is lower than what is proposed in the consultation document, this allows the site to come forward without delay and provide a significant increase of circa 90 affordable homes to add to the provision in this area of Edinburgh.

The Masterplan indicates that there will be a section of affordable housing to the east of the development and a further section to the west. These sections of affordable housing will be designed so that they are tenure blind and will be fully integrated into the wider development. It is considered that the integration of substantial community facilities into the development will allow for a high quality of life for all residents and enhanced community cohesion.

As such, it is considered that the proposal would meet the principle aims of Choice 11. The development would have the ability to provide circa 90 affordable homes which could be delivered in the early stages of the Plan.

Choice 12 - Building our new homes and infrastructure

Choice 12 sets out the housing need for Edinburgh and this consists of; 22,600 Market Housing and 20,800 Affordable Housing. The consultation document outlines three different options which outline methods about how and where the new homes are delivered.

Scotland's Third National Planning Policy Framework (NPF3) (2014) aims to facilitate new housing development within existing areas of growth and through innovative approaches to rural housing provision. Scottish Planning Policy (2014) sets out that one of the Policy Principles of enabling the delivery of new homes is to 'have a sharp focus on the delivery of allocated sites.'

Option 1 is the preferred Option for the Council and this sets out that 17,600 units will be provided within the urban area. While it is not explicitly mentioned, it is assumed that a large proportion of this development will be on brownfield land. The document sets out that 'of the 275 hectares of the potential urban land sites, only 11 hectares is vacant land ready for development, 30 hectares has planning consent (but with a lower % of affordable housing) and the remainder is currently in use as employment land'.

This is clearly a significant constraint to this preferred approach as this suggests that approximately 85% of the allocated land is currently unavailable for development. It should be highlighted that, many brownfield sites, whilst capable of contributing to the long-term site allocation strategy of the Council, are not deliverable in the short term, which could have a significant impact on the Council's delivery of both market and affordable housing. It is therefore considered that an over-reliance on Option 1 provides substantial risk on the Council meeting the housing targets set out in the City Plan and would not accord with the principles set out in Scottish Planning Policy.

On the other hand, option 2 proposes the 'release new land for 27,900 homes from the Green Belt and identify the supporting infrastructure to meet the market and affordable housing targets, as a market-developer led approach.' This option also carries substantial risk through relying on a select few sites to deliver the entire housing need for Edinburgh. Notwithstanding this, focussing entirely on sites in the Green Belt would require significant investments in new infrastructure to support these large communities which could impact on the deliverability of these strategic sites.

Therefore, it is considered that option 3- the blended approach is the most appropriate to deliver the housing need in Edinburgh. Most importantly, however, when considering allocated sites for the new Plan, it is crucial that the sites which are brought forward are viable and deliverable.

Recent research issued by The Scottish Government titled 'The Deliverability of Site Allocations in Local Development Plans' (2020) explores the types of information which is required to demonstrate a sites deliverability. Results from a survey sent to all Scottish local development and National Park planning authorities found that 'assessing deliverability- particularly viability- can be challenging during the early stages of considering sites'. The report also suggests that 'infrastructure capacity may be broadly understood, but investment options are not firm commitments and site-specific solutions may be lacking, particularly where there are cumulative impacts, and have later impacts upon viability and deliverability.'

With regards to the site at Land beside Ravelrig Road, development proposals are already at an advanced stage. A thorough assessment of the site by technical consultees has been undertaken to identify the existing constraints and opportunities of the site. These factors have dictated the developable area of the site and have informed the indicative masterplan attached to this document. Given the extensive work which has already been undertaken to determine the approach at this site, it has been established that the Masterplan displays a viable development proposal on a site which is available and can be delivered in the early stages of the Plan period. To summarise:

- The topography of the site slopes downwards from south to north. The site is located within the Green Belt, however it is contained by housing development to the south and east and an existing railway line to the north.
- There are no statutory ecological designated sites located within 2 km of the Survey Area. There are nine non-statutory designated sites within 2 km of the Survey Area; these are a combination of five Local Biodiversity Sites (LBS) and four Sites of Importance for Nature Conservation (SINC). Whilst further survey prior to construction in relation to species found on site is recommended, these

impacts are considered not to be significant, particularly with the incorporation of precautionary mitigation for these species into the final design.

- There are no designated historic assets located within the site or within a proximity which would be impacted by the development. In relation to archaeological potential, It is anticipated that the proposed scheme will include groundworks which could impact on any archaeological remains that may be present within the Site. However, any remains encountered are likely to be of low to medium heritage significance.
- The Flood Risk Assessment has concluded that the Site has low flood risk constraints from all sources and the site is considered appropriate for applying for further planning approval.
- A Geo-environmental Desk Study Report has been conducted which identifies that there is a moderate risk of landslides affecting the site, largely due to changes in slope present. It is recommended that an intrusive ground investigation should be undertaken to confirm the ground conditions, inform the geotechnical design process and allow sampling of the existing soils to determine their chemical suitability for retention on site. It is considered however that this can be effectively mitigated and managed through the design process.
- The Masterplan Framework enclosed with these representations illustrate that the site is capable of delivering at least 300 new homes and associated infrastructure, including extensive multifunctional community facilities and green infrastructure. The masterplan framework is commensurate with the rural character of the wider area but is also informed by technical assessments with the objective of making efficient use of existing capacities of land consistent with paragraph 29 of NPF3.
- The main access to the site would be gained from the existing Ravelrig Road which runs through the site. The highest proportion of the development would be to the west of Ravelrig Road and it is anticipated that this will be served by two main access points. Development to the east of Ravelrig Road will be services by one access point.
- As indicated on the masterplan framework there is significant potential to deliver a comprehensive integrated transport package that complements and enhances existing public transportation routes.

The initial masterplan for the site will evolve in response to collaborative working with the City of Edinburgh Council, the local community and other relevant stakeholders to deliver the site as part of the wider Balerno strategic development location. Land Beside Ravelrig Road forms a logical final phase of development in this area of strategic growth.

Summary

Experience suggests that medium to larger scale developments that are well located and designed, and supported by the necessary infrastructure and facilities, can facilitate and/or contribute towards strategic infrastructure improvements required to support the sustainable delivery of new homes and jobs.

The position of the Site means that new homes can be delivered in the short term, contributing positively to housing supply in the City of Edinburgh which will be supported by existing and enhanced local infrastructure. The Masterplan accompanying these representations illustrates how new homes could come forward in a sustainable and logical way, meeting the core principles of the City Plan document and National

Planning Policy, to the benefit of the local community whilst remaining an important element of the long-term growth ambitions for the area.

Yours sincerely,

H.Mitchell

H.Mitchell (Mar 26, 2020)

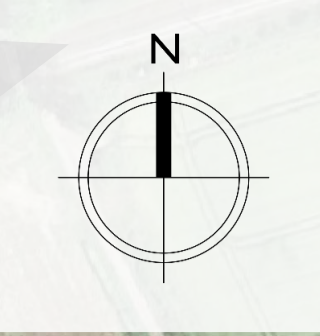
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INFORMAL TRAIL PATH AROUND PERIMETER

ADDITIONAL LOW-LEVEL STRUCTURE PLANTING

STRENGTHEN LANDSCAPE PLANTING TO NORTHERN BOUNDARY

NEW STRUCTURE PLANTING WITHIN OPEN SPACE

POTENTIAL FOR COMMUNITY ALLOTMENTS

STRENGTHEN LANDSCAPE PLANTING TO WESTERN BOUNDARY

STRENGTHEN LANDSCAPE PLANTING TO SOUTHERN BOUNDARY