Customer Ref:	00092	Response Ref:	ANON-KU2U-GPVS-7	Supporting Info	
Name	Antony Duthi	•			larendonpd.co.uk
Response Type	Agent / Cons				
On behalf of:		Wilson Homes (BDW)			
	ļ				
Choice	1 A				
	•			e, regional, and national gre	een network. We want new development to connect to, and
deliver this netwo	ork. Do you agr	ee with this? - Select s	upport / don't support		
Short Response	Yes				
Explanation	The desire to c	connect the City with a	network of multi-functional gre	en spaces is generally suppo	rted by BDW albeit further detail is required.
Choice	1 B				
We want to chan	ge our policy to	require all developme	ent (including change of use) to	include green and blue infr	rastructure. Do you agree with this? - Support / Object
	<u> </u>			<u> </u>	
Short Response	Yes				
Explanation		to include green and h	due infrastructure in new devel	onments is also supported by	y BDW in cohort with its Group wide national mandate of
LAPIANATION		_			ble. Notwithstanding this support, the inclusion of green
	1 '	•	· ·	•	oportionate to the scale of the site and proposal and
	_	•			mple and with cognisance to achieving density targets. In all Authority and Scottish Water particularly with regard to
					al solutions and agreed in line with the respective
	requirements	of SEPA and Scottish W	ater to facilitate adoption.		

Customer Ref:	00092 Response Ref: ANON-KU2U-GPVS-7	Supporting Info
Name	Antony Duthie	Email aduthie@clarendonpd.co.uk
Response Type	Agent / Consultant	
On behalf of:	Barratt David Wilson Homes (BDW)	
Choice	1 C	
We want to iden	ify areas that can be used for future water management to enable	e adaptation to climate change. Do you agree with this? - Yes / No
Short Response	Not Answered	
Explanation	In terms of the identification of areas that may be used for future vand, particularly, if this is to cross-over extant policy and guidance.	water management, BDW would require further detail on this proposition to fully comment
Choice	1 D	
We want to clear Yes / No	ly set out under what circumstances the development of poor qua	lity or underused open space will be considered acceptable. Do you agree with this? -
Short Response	Yes	
Explanation	In the interest of efficient use of urban land and meeting housing to development of poor quality or underused open space that may ot	argets, BDW support the notion of a city-wide review and clarity in the respect of the therwise be unnecessarily protected.

Customer Ref:	00092	Response Ref:	ANON-KU2U-GPVS-7	Supporting Info		
Name	Antony Duthie		7111011 11020 01 13 7	Email aduthie@claren	donad so uk	
	,			eman adutile@ciaren	donpa.co.uk	
Response Type	Agent / Consultar	nt				
On behalf of:	Barratt David Wil	son Homes (BDW)				
Choice	1 E					
We want to intro you agree with the		arge green space s	standard' which recognises tha	t as we grow communities will no	eed access to green spaces more than 5	5 hectares. Do
,	·					Į.
Short Response	No	1				
Explanation	In terms of open su	ace provision with	hin new developments, again, B	DW consider that this should be p	proportionate to the size and scale of the	e proposal and
,		•		•	pouring open space provision should be	
		•		•	030 proposes a new "extra-large green	•
		•	, , , , , , , , , , , , , , , , , , , ,		reen space would be equivalent to the savision of such a significant amount of gr	
			· ·		uld be fully utilised by future residents.	cerr space within
Choice	1 F					
We want to identifies? - Yes / No	tify specific sites for	new allotments a	and food growing, both as part	of new development sites and w	ithin open space in the urban area. Do	you agree with
,						
Short Response	Yes					
Explanation		dentification of lar	ad for allotments and food grow	ing hut such an asniration must h	e chiectively halanced with the develor	nment nlan's
-Apidilation		W support the identification of land for allotments and food growing but such an aspiration must be objectively balanced with the development plan's accurrent objectives such as housing targets and increased density requirements.				

Customer Ref:	00092 Response Ref: ANON-KU2U-GPVS-7	Supporting Info
Name	Antony Duthie	Email aduthie@clarendonpd.co.uk
Response Type	Agent / Consultant	
On behalf of:	Barratt David Wilson Homes (BDW)	
Choice	1 F	
We want to ident this? - Upload (m		rt of new development sites and within open space in the urban area. Do you agree with
Short Response	No	
Explanation		
Choice	1 G	
We want to ident	ify snace for additional comptery provision, including the notentia	al for green and woodland burials. Do you agree with this? - Yes / No
	iny space for additional centerery provision, including the potentia	arror green and woodland burlans. Do you agree with this: - 1637 No
	iny space for additional cemetery provision, including the potentia	arior green and woodiand buriais. Do you agree with this: - resy no
Short Response	Not Answered	arior green and woodiand burians. Bo you agree with this: 4 resy no
	Not Answered BDW support the provision of sufficient cemetery and related land	, however, if ground is in private ownership, the landowner obviously needs to be in
Short Response	Not Answered BDW support the provision of sufficient cemetery and related land	
Short Response Explanation	Not Answered BDW support the provision of sufficient cemetery and related land agreement and/or may have alternative aspirations. Preference shape agreement and agreement agreement and agreement and agreement and agreement agreem	, however, if ground is in private ownership, the landowner obviously needs to be in
Short Response Explanation Choice	Not Answered BDW support the provision of sufficient cemetery and related land agreement and/or may have alternative aspirations. Preference sh	, however, if ground is in private ownership, the landowner obviously needs to be in ould first be afforded to land already vested with the Local Authority.
Short Response Explanation Choice	Not Answered BDW support the provision of sufficient cemetery and related land agreement and/or may have alternative aspirations. Preference shape at the second control of the	, however, if ground is in private ownership, the landowner obviously needs to be in
Short Response Explanation Choice We want to revis	Not Answered BDW support the provision of sufficient cemetery and related land agreement and/or may have alternative aspirations. Preference shape at the second control of the	, however, if ground is in private ownership, the landowner obviously needs to be in ould first be afforded to land already vested with the Local Authority.
Short Response Explanation Choice We want to revis	Not Answered BDW support the provision of sufficient cemetery and related land agreement and/or may have alternative aspirations. Preference shape at the second control of the	, however, if ground is in private ownership, the landowner obviously needs to be in ould first be afforded to land already vested with the Local Authority.
Short Response Explanation Choice We want to revis Do you agree wit	Not Answered BDW support the provision of sufficient cemetery and related land agreement and/or may have alternative aspirations. Preference shape our existing policies and green space designations to ensure that the this? - Yes/No Yes BDW support policy directive that seeks to ensure long term maintage.	, however, if ground is in private ownership, the landowner obviously needs to be in ould first be afforded to land already vested with the Local Authority.

Customer Ref:	00092 R	Response Ref:	ANON-KU2U-GPVS-7	Supporting Info		
Name	Antony Duthie			Email aduthie@c	clarendonpd.co.uk	
Response Type	Agent / Consultant					
On behalf of:	Barratt David Wilson	Homes (BDW)				
	,					
Choice	2 A					
		•	•		their design will incorporate measur age and mobility issues as a key part	•
Short Response	Yes					
Explanation	The requirement for a	II new developn	nent proposals to address cl	imate change and accessibility	issues is supported BDW if reasonable	e and equitable.
Choice	2 B					
We want to revis Yes / No	e our policies on densi	ty to ensure tha	it we make best use of the l	limited space in our city and th	at sites are not under-developed. Do	you agree with this? -
						-
Short Response	Yes					
Explanation	BDW support the max	imisation and e	fficient use of land consister	nt with their longstanding contr	ibution to housing development in th	e City to date. However,

the requirement for an increase density ratio of 65 dwellings per hectare for greenfield sites is not accepted. The increase in housing density requirements would effectively double the current requirement of 30 units per hectare as expected by the adopted Edinburgh City Local Development Plan. The suitability of this hugely ambitious density for greenfield developments is questioned, especially in relation to sites that are located on the edge of settlements. In many situations the proposed high-density requirement would be at the cost of good design and the creation of placemaking and would be in direct conflict with the requirements of Scottish Planning Policy. Such a density requirement would also reduce the variety and range of homes that could be provided and would result in more terraced and flatted accommodation being built. Larger detached family housing with gardens, which are reflective of existing properties within the suburban area, would be more difficult to provide if the higher density ratio was enforced. This, in turn, would have significant knockon implications on the overall range of housing offered within the City and would likely result in migration of families to other Lothian authority areas in search for family type housing in line with market demand. Similarly, a blanket approach to site coverage would fail to take into account site specific considerations such as technical parameters, cultural designations and the like. Inherently, all sites have their own set of constraints and opportunities. To reiterate, BDW support the efficient use of land but, rather than employing an overly restrictive approach, developers should demonstrate efficiency through their design whilst responding to site specific considerations that a 'catch all' policy cannot do.

Customer Ref:	00092 Response Ref: ANON-KU2U-GPVS-7	Supporting Info
Name	Antony Duthie	Email aduthie@clarendonpd.co.uk
Response Type	Agent / Consultant	
On behalf of:	Barratt David Wilson Homes (BDW)	
Choice	2 C	
We want to revise	e our design and layout policies to achieve ensure their layou	ts deliver active travel and connectivity links. Do you agree with this? - Yes / No
Short Response	Yes	
Explanation	BDW support active travel and connectivity as the existing Developicy are envisaged.	velopment Plan policies already encourage. Further detail is thus required as to what changes in
Choice	2 D	
	lopment, including student housing, to deliver quality open s agree with this? - Yes / No	pace and public realm, useable for a range of activities, including drying space, without losing
•	·	
Short Response	Not Answered	
Explanation	BDW support the delivery of quality open space, however, a cand indeed student housing, the latter of which have, to date,	onsistent approach should be applied to not just private housing developments but affordable often lacked adequate open space provision.

Customer Ref:	00092 Response Ref: ANON-KU2U-GPVS-7	Supporting Info
Name	Antony Duthie	Email aduthie@clarendonpd.co.uk
Response Type	Agent / Consultant	
On behalf of:	Barratt David Wilson Homes (BDW)	

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

The ambition to deliver more energy efficient dwellings through design and associated infrastructure provision is supported by BDW. Indeed, as a National Developer, BDW have committed to reduce direct carbon emissions from its business by 29% by 2025 and, concurrently, cut indirect emissions by 11% by 2030. However, it is submitted that emissions standards for new buildings should continue to be the responsibility of the building standards regulatory system and not the planning system. In this regard, the proposed City Local Development Plan 2030 should include an 'aim' of achieving carbon neutral buildings, and not be a specific planning policy requirement so as to avoid conflict with national directive and, moreover, ensure consistency.

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 Yes

Explanation

In terms of Place Briefs, it is submitted by BDW that, the preparation of such Plans should be required for major strategic sites only and should not be a requirement for local development sites under 2 hectares. Place Briefs should also be prepared in conjunction with professional consultants who can provide expert advice and evidence on technical matters such as education, transport and infrastructure provision. Such issues cannot be solely left to local communities who do not have the professional expertise to consider the full ramifications of a development. It is also essential that developers and landowners are involved in the preparation of the Place Briefs, as this will guide the build rates and delivery times for new developments. If the preparation of Place Briefs is left solely to local communities, they could be based on emotive interpretation of relevant issues and not factual evidential information or professional calculation.

Customer Ref:	00092 Response Ref: ANON-KU2U-GPVS-7	Supporting Info
Name	Antony Duthie	Email aduthie@clarendonpd.co.uk
Response Type	Agent / Consultant	
On behalf of:	Barratt David Wilson Homes (BDW)	
Choice	4 B	
	ort Local Place Plans being prepared by our communities. City Plantions How should the Council work with local communities to pre	2030 will set out how Local Place Plans can help us achieve great places and support epare Local Place Plans?
Short Response	Not Answered	
Explanation		uch Plans to be prepared by local communities and set proposals for development of land
		posed City Local Development Plan 2030, and any related policy, should be clear that Local by must also clearly state that Local Place Plans should adhere to the housing land supply
		lace Plans should be informed by professional expert advice relating to technical matters
	and infrastructure provision e.g. education, transport etc.	
Choice	5 A	
-	•	ure capacity, including education, healthcare and sustainable transport, or where
potential new inf	frastructure will be accommodated and deliverable within the plan	period. Do you agree with this? - Yes / No
Short Response	Yes	

The broad aim of directing new development to locations that have infrastructure capacity, or where additional capacity can be accommodated, is supported

Explanation

by BDW.

Customer Ref:	00092	Response Ref:	ANON-KU2U-GPVS-7	Suppo	rting Info				
Name	Antony Duthie	!		Email	aduthie@cla	arendonpd	.co.uk		
Response Type	Agent / Consu	ltant							
On behalf of:	Barratt David \	Wilson Homes (BDW)							
Choice	5 B								
•			ity facilities are needed, and t ces. Do you agree with this? - Y		be well conne	ected to ac	tive travel rou	ates and in loca	tions with high
Short Response	Yes								
Explanation	It is also genera community faci		that new development should	be in well-conne	ected accessik	ole location	s that are wit	hin walking dist	ance of local
	1								,
Choice	5 C								
We want to reflect travel. Do you ag			ity services close to the comm	unities they serv	ve, supportin	g a high wa	alk-in populat	tion and reducir	ng the need to
Short Response	Yes								
Explanation	The co-location	of community service	s is, in principle, supported by I	BDW, subject to	services being	g required.			
·		•	, , , , , , , , , , , , , , , , , , , ,	•	•	<u> </u>			
Choice	5 D1								
We want to set o	ut in the plan wh	nere development wi	l be expected to contribute to	ward new or exp	panded comn	nunity infr	astructure. Do	o you agree wit	h this? - Yes / No
Short Response	Yes								
Explanation	burden derived	from the developmen	ontribution towards infrastruct at. Requirements should thereb e proportionate to the propose	y comply with th	ne terms of Pl	-		·	

Customer Ref:	00092	Response Ref:	ANON-KU2U-GPVS-7	Supp	orting Info			
Name	Antony Duthie			Emai	aduthie@clarendo	onpd.co.uk		
Response Type	Agent / Consultan	t						
On behalf of:	Barratt David Wils	on Homes (BDW)						
Choice	5 D2							
We want to use o	umulative contribu	tion zones to dete	ermine infrastructure actions,	costs and delive	ry mechanisms. Do y	ou agree with this? - \	Yes / No	
Short Response	No							
Explanation			ribution zones to determine inf cransparent and apply to not ju		·	•		
Choice	5 E							
We want to stop you agree with th		y guidance and se	et out guidance for developer	contributions w	ithin the plan, Action	n Programme and in n	on-statutory guid	dance. Do
Short Response	Yes							
Explanation	guidance will simpl	ify planning proce	e Supplementary Guidance for esses. Developer contributions plan itself in the interests of tra	have an increasi	ngly significant impa	ct upon development v	•	

Customer Ref:	00092 Response Ref: ANON-KU2U-GPVS-7	Supporting Info				
Name	Antony Duthie	Email aduthie@clarendonpd.co.uk				
Response Type	Agent / Consultant					
On behalf of:	Barratt David Wilson Homes (BDW)					
Choice	6 A					
	e a new policy that assesses development against its ability to mee current or planned public transport services and high-quality active	t our targets for public transport usage and walking and cycling. These targets will vary travel routes. Do you agree with this? - Yes / No				
Short Response						
Explanation	While the ambition to decrease dependence on cars is fully acknowledged by BDW, the key to a reduction in car travel is inherently enabled through the provision of quality public transport system and connectivity into existing footpaths and cycleways. Furthermore, there must be cognisance to the fact that the majority of households will still wish to retain a car for multiple trip journey's and longer distance travel.					
Choice	6 B					
	lace Briefs to set the targets for trips by walking, cycling and publicing levels to support high use of public transport. Do you agree wit	transport based on current and planned transit interventions. This will determine th this? - Yes / No				
Short Response	No					
Explanation		le travel patters but car usage will prevail for most households when alternative modes lly considered so as to avoid informal parking and conflict with other road users if supply,				

Customer Ref:	00092 Response Ref: ANON-KU2U-GPVS-7	Supporting Info			
Name	Antony Duthie	Email aduthie@clarendonpd.co.uk			
Response Type	Agent / Consultant				
On behalf of:	Barratt David Wilson Homes (BDW)				
Choice	7 A				
	rmine parking levels in development based on targets for trips by w I will be supported by other measures to control on-street parking.	valking, cycling and public transport. These targets could be set by area, development Do you agree with this? - Yes / No			
0,00,0000000000000000000000000000000000	a. capparace a, c	20 ,00 48.00 1101 1101 100 110			
Short Response	No				
Explanation	As stated above (6B), BDW consider that the key to reducing car usage in Edinburgh is the provision of new and improved public transport and interaction with active modes of transport. Without an improvement to public transport, the required modal shift from cars is unlikely to happen. Equally, as also state above, while the aim of achieving car-free developments is admirable, the emerging City Local Development Plan 2030 must recognise that the majority of households will inevitably wish to retain a car to enable multiple trip journeys and longer distance travel.				
Choice	7 B				
We want to prot you agree with tl		ntre to support the delivery of the Council's city centre transformation programme. Do			
Short Response	Not Answered				
Explanation	No comment.				

Customer Ref:	00092	Response Ref:	ANON-KU2U-GPVS-7	Supp	orting Info		
Name	Antony Duthie			Email	aduthie@clarendo	onpd.co.uk	
Response Type	Agent / Consultan	t					
On behalf of:	Barratt David Wils	son Homes (BDW)					
Choice	7 C						
We want to upda agree with this?		ies to control den	nand and to support parking f	for bikes, those v	vith disabilities and	electric vehicles via charg	ging infrastructure. Do you
Short Response	Not Answered						
Explanation	BDW consider furth supporting alternat	•	ed on what may be proposed i is in place.	in terms of contro	olling parking and ho	ow this will be informed b	y, for example, by whether
Choice	7 D						
Mobility Plan or i	ts action plan. Do yo	ou agree with this	ture by safeguarding sites for i? - We want to support the ci d in the City Mobility Plan or i	ty's park and rid			-
Short Response	Yes						
Explanation	BDW support the us	se of park and ride	e and the identification of sites	s for this purpose	, however, further o	letail is required to enable	e meaningful comment.

Customer Ref:	00092	Response Ref:	ANON-KU2U-GPVS-7	Supporting Info		
Name	Antony Duthi	е		Email aduthie@	Oclarendonpd.co.uk	
Response Type	Agent / Consu	ultant				
On behalf of:	Barratt David	Wilson Homes (BDW)				
Choice	8 A					
We want to upda	te our policy or	n the Cycle and Footpa	ath Network to provide criteri	a for identifying new routes	s. Do you agree with this? - Yes / No	
Short Response	Yes					
Explanation	should be unde	ertaken, and where de he provision of new wa	ficiencies or improvements ca	n be identified, then these s	review of the entire cycle/footpath netwo hould be highlighted. Any request for new the development proposal, as well as m	w development to
Choice	8 B					
-	•				and cycling links around the city, we war hey are delivered. Do you agree with this	
Short Response	Yes					
Explanation						

Customer Ref:	00092	Response Ref:	ANON-KU2U-GPVS-7	Supporting Inf	o		
Name	Antony Duthic	e		Email aduthie	e@clarendonpo	d.co.uk	
Response Type	Agent / Consu	ultant					
On behalf of:	Barratt David	Wilson Homes (BDW)					
Choice	8 C						
to include any ne	w strategic acti	-	er strategic active travel links water strategic active travel links water symbol in the forthcomes / No		•		_
Short Response	Yes						
Explanation		he provision of additions	nal strategic walking and cyclinle.	g routes. BDW further su	upport the safeg	guarding of active trav	el links within allocated
		<u> </u>					
Choice	8 C						
to include any ne	w strategic acti	ve travel links which n	er strategic active travel links we hay be identified in the forthcoload new cycle routes		•		_
Short Response Explanation	No		·				
Choice	9 A						
	_		of Edinburgh, as a 'Short Tern ee with this approach? - Yes /		e planning per	mission will always be	required for the change of
Short Response	Yes						
Explanation	BDW supports	consultation on the co	ntrol of short-term lets.				

Customer Ref:	00092	Response Ref:	ANON-KU2U-GPVS-7	Supporting Info
Name	Antony Duthic	e		Email aduthie@clarendonpd.co.uk
Response Type	Agent / Consu	ultant		
On behalf of:	Barratt David	Wilson Homes (BDW)	<u> </u>	
Choice	9 B			
			•	oolicy will be used when planning permission is required for a change of use of residential you agree with this? - Yes / No
Short Response	Not Answered			
Explanation	Without furthe	er detail on policy cont	ent it is not possible for BDW	o meaningfully comment on a policy regarding loss of homes to alternative uses.
Choice	10 A			
		• •	_	that student housing is delivered at the right scale and in the right locations, helps create
		Ne ottor ctudopt's wo		
sustainable comr	nunities and loc	oks after student's we	llbeing. Do you agree with th	s? - Yes / No
		oks after student's we	libeing. Do you agree with th	s? - Yes / No
Short Response	Not Answered			
	Not Answered		scale or location of student ho	
Short Response	Not Answered			
Short Response	Not Answered			
Short Response Explanation Choice	Not Answered BDW do not ha	ive comments on the s	scale or location of student ho	
Short Response Explanation Choice We want to creat	Not Answered BDW do not ha	ive comments on the s	scale or location of student ho	using.
Short Response Explanation Choice We want to creat this? - Yes / No	Not Answered BDW do not ha	ive comments on the s	scale or location of student ho	using.
Short Response Explanation Choice We want to creat this? - Yes / No	Not Answered BDW do not ha 10 B te a new policy f No BDW do not su Proposed City I	framework which sets pport a policy that requal plan to impose. While	scale or location of student ho sout a requirement for housing	asing. In g on all sites over a certain size coming forward for development. Do you agree with In a certain size. Such a policy would be overly restrictive and unreasonable for the emerging supported by BDW, site context and location must be considered. The universal suggestion

Customer Ref:	00092 Response Ref: ANON-KU2U-GPVS-7	Supporting Info
Name	Antony Duthie	Email aduthie@clarendonpd.co.uk
Response Type	Agent / Consultant	
On behalf of:	Barratt David Wilson Homes (BDW)	

Choice 10 C

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

Short Response Not Answered

ExplanationBDW support the principle of a policy to promote redevelopment of out of centre retail units and commercial centres for mixed uses.

Customer Ref:	00092 Response Ref: ANON-KU2U-GPVS-7	Supporting Info
Name	Antony Duthie	Email aduthie@clarendonpd.co.uk
Response Type	Agent / Consultant	
On behalf of:	Barratt David Wilson Homes (BDW)	

Choice 11 A

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

Short Response No

Explanation

The proposed change from delivering 25% affordable housing land requirement to 35% is not supported by BDW as a general rule. In particular, such a change in affordable housing provision is contrary to existing Scottish Planning Policy (SPP) which confirms that the level of affordable housing required as a contribution within a market site should be no more than 25% of the total numbers of houses (SPP - Paragraph 129). Given the conflict with Scottish Government Policy, it is considered that the required level of affordable housing provision within a development site should, consistently, remain as 25%.

While the provision of a mix of housing types and tenures on new development sites is generally favored. BDW consider it unreasonable to apply prescriptive targets for the mix of market housing through a specific planning policy. In this respect, it is important to allow enough flexibility to respond to variation in demand over time and across different locations. The requirement for flexibility is consistent with SPP which states "Planning can help to address the challenges facing the housing sector by providing a positive and flexible approach to development," (Paragraph 109). BDW has built approximately 2.000 homes in the City of Edinburgh Local Authority area in the last 5 years. Of those approximately 570 were affordable, BDW have a further 1,780 homes with planning permission on both green and brownfield sites that have commenced work and 469 of these will be affordable homes. Demonstrably, BDW are evidently committed to delivering a range of both market and affordable housing in Edinburgh, however, do not support an increase in the affordable requirement from 25% to 35% for the following reasons: -The LDP is being prepared under current legislation, within the overarching context of SPP being still in place as the extant National Policy which is clear in its directive stating that the affordable housing requirement should be no more than 25%. Affordable housing demand is clearly a product and result of historical undersupply across all tenures. Unless the whole housing requirement is planned for and met, affordability issues will perpetuate, regardless of the affordable target. In order to deal with a shortfall in affordability, a Development Plan that allocates a range and choice of housing sites is more likely to ensure delivery of the homes required to meet the needs of the population. A range of brownfield and greenfield sites, of varying sizes and in different locations, will allow the market to deliver the homes required to meet housing need across all tenures within the Plan period.

Customer Ref:	00092 Response Ref: ANON-KU2U-GPVS-7	Supporting Info
Name	Antony Duthie	Email aduthie@clarendonpd.co.uk
Response Type	Agent / Consultant	
On behalf of:	Barratt David Wilson Homes (BDW)	

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 Yes

Explanation

BDW support an approach that allows a broad range of type and tenure of homes to be included in the affordable proportion of homes in developments. However, where a strict prescriptive approach to the proportion of different types is adopted, this can impede viability, delivery timescales and design. Developers work with RSL's to meet their needs which, in BDW's experience, is 1, 2 & 3 bedroom homes irrespective of the private mix of the wider site. Universally applying a representative mix will reduce site densities restricting overall provision of housing contrary to the wider aspirations of the development plan.

Name Antony Duthie Email aduthie@clarendonpd.co.uk Response Type Agent / Consultant On behalf of: Barratt David Wilson Homes (BDW)	Customer Ref:	00092 Response Ref: ANON-KU2U-GPVS-7	Supporting Info
	Name	Antony Duthie	Email aduthie@clarendonpd.co.uk
On behalf of: Barratt David Wilson Homes (BDW)	Response Type	Agent / Consultant	
	On behalf of:	Barratt David Wilson Homes (BDW)	

Choice 12 Δ

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

Short Response Option 3 (Blended

Explanation

BDW recognises the unique policy context for the preparation of the City Plan 2030. It is accepted that LDPs in areas covered by a Strategic Development Planning Authority (SDPA) are required to be produced shortly after the Strategic Development Plan (SDP) has been adopted. However, the latest SDP that covers Edinburgh City was adopted in 2013 and does not include housing targets broken down by Local Authority beyond 2024. It is accepted that the new Planning (Scotland) Act 2019 has no requirement for the production of SDP's and, as a consequence, housing requirement will be set by National Planning Framework 4 (NPF4). It is acknowledged that NPF4 is not expected to be approved until late 2021. On this basis, due to the lack of up-to-date housing requirement figures, it is understood that Choices 2030 utilised the updated Housing Need and Demand Assessment 2 (HNDA2) as a basis to calculate the housing requirements for the City up to 2032. Choices 2030 narrates two options for a housing target, as follows:1.Preferred Option: 43,400 homes between 2019-32, comprising of 20,800 affordable homes and the market output for the HMDA 2 Wealth Distribution Scenario less completions between 2012 and 2019, 2. Alternative Option: 52,800 homes between 2019-32, comprising of 20,800 affordable homes and the market output for the HMDA 2 Wealth Distribution Scenario less completions between 2012 and 2019. BDW submits that both options fall significantly short of meeting the required housing need and demand in full. The Preferred Option would meet just 65% of identified need and demand in the HNDA 2 Wealth Distribution Scenario once completions to 2019 are accounted for. While the Alternative Option would meet 79% of identified need and demand in the HNDA 2 Wealth Distribution Scenario, or 65% of the Strong Economic Growth Scenario. Choices 2030 or the Housing Study do not adequately justify why housing need and demand identified in HNDA2 cannot be met in full. This is a significant issue within the context of an historic severe undersupply of housing and housing land in Edinburgh and merits further serious attention. Subsequently, BDW are of the robust opinion that, the housing supply targets proposed in Choices 2030, have been fundamentally based on an inadequate consideration of relevant evidence. It is noted by BDW that, the Alternative Option of 52,800 homes, is discounted by the Housing Study on the reasoning that the supporting evidence to the HNDA suggests the Strong Economic Growth Scenarios were unrealistic. However, this evidence was produced over 7 years ago in 2013 (Oxford Economics reference) and applied to the whole SESPlan region. It is considered the conclusion relating to the economic growth of the City are thus dated and are not relevant to Edinburgh's economic position in 2020, or for the proceeding decade to 2030. It is fact that the population of Edinburgh increased by 13% between 2008-18 (or 6,000 people per year) and is continuing to grow at this rate. This level of growth is nearly 3 times the rate of change in Scotland's population over the same period. Furthermore, Edinburgh topped the Lambert Smith Hampton (2019) Vitality Index, which assessed 66 UK towns and cities, and reflected strong wage growth, as well as house price growth. Additionally, private housing completions within Edinburgh and the Lothians are currently at record high levels; this is despite housing completions in Scotland, as a whole, remaining below the pre-recession peak. Similarly, neighbouring Lothian authorities are experiencing building rates in excess of prerecession levels. Indeed, private completions in Midlothian for the year to Q3 2019 are 358% higher than the annual pre-recession average and 77% higher in East Lothian. This demonstrates the strength of the Lothian market and the increase in housing delivery which is possible when land is made available.

Customer Ref:	00092 Response Ref:	ANON-KU2U-GPVS-7	Supporting Info
Name	Antony Duthie		Email aduthie@clarendonpd.co.uk
Response Type	Agent / Consultant		
On behalf of:	Barratt David Wilson Homes (BDW)		

BDW supports a combination of brownfield and greenfield allocations as set out in Option 3 but not at the levels proposed. Inevitably, it is BDW's contention that significantly more greenfield land will need to be allocated than intimated by Option 3. This is compounded by an unrealistic anticipation (and lack of supporting information) of delivery from urban sites over the Plan period. Even if the optimistic delivery of 11,000 homes on the brownfield sites was possible as hoped for in Option 3, greenfield release of approximately 28,000 homes as outlined in Option 2 would be necessary. It is BDW's view that large scale greenfield release, similar to the amount contemplated in Option 2, will be required. However, the changes to the Plan should also consider options to expedite short-term housing delivery facilitated via the introduction of a range of smaller greenfield sites to augment the housing land supply with their inherently shorter lead-in time when compared to strategic sites. As set out above we consider this will need to be augmented with some smaller greenfield sites deliverable in the short term. More housing land is thus required and the methodology for same should be correctly drawn from Scottish Planning Policy (SPP). In this respect, BDW draw reference to paragraphs 119/120 and Diagram 1 of SPP. In this respect, BDW consider that the amount of new housing allocations required should be calculated by subtracting existing "sites which are effective or expected to become effective in the plan period" (Paragraph, 119/120) from the Housing Land Requirement and allocate additional land to make up any shortfall between. In this respect, SPP (Paragraph 113) stipulates that Plans must be informed by a robust housing need and demand assessment (HNDA). In this case, HDNA2 is the most up to date assessment and should therefore be the basis for quantifying the City Plan 2030's Housing Supply Target which, further, SPP states should "properly reflect" the estimate of housing demand (Paragraph 113). Concurrently, taking the above into account, succinctly, the true 'New Land Requirement' is correctly illustrated below.HNDA (2019 - 2032) 67,174 unitsHousing Supply Target (2019-32) 67,174 unitsHousing Land Requirement (+ 10%)73,892 unitsEffective Supply 21,055 unitsRemaining Land to be Allocated 52.837 unitsChoices 2030 informs that the identification of land required to meet the Housing Supply Target could be done three ways:- • 1 - the Council 'identifies sites for 17,600 homes within the urban area, thus avoiding the use of greenfield sites. • Option 2 - the required housing target is delivered through market housing and a release of new land for 27,900 homes from the green belt, or • ption 3 - a blended approach, which would involve the provision of 11,000 homes on brownfield / urban land and release land 6,600 homes from the green belt. Choices 2030 promotes Option 1, delivery through the Council and its partners, through the provision of brownfield land within the urban area, as the preferred option of delivering the required housing supply up to 2032. In the first instance, following on from the above comments on HST, it is considered that the Council should confirm the actual housing supply target that is required by the emerging City Local Development Plan 2030. As stated above, it is considered that a significant higher housing land supply, of approximately 67,174 houses, is required than indicated in Choices 2030. In response to the Council's Preferred Option of delivering the required HST through brownfield sites within the urban area, Option 1, it is considered that this option is totally unrealistic. While the importance of reusing previously developed (brownfield) land is fully recognised as a key aim of the planning system, the reliance upon such land to provide a significant amount of housing is fundamentally questioned. This is fully illustrated by the fact that Choices 2030 Housing Study background document identifies a requirement for 275 hectares of urban land to meet the preferred housing target, however only 11 hectares of brownfield land is actually identified by Choices 2030 as being suitable for redevelopment for housing. Furthermore, it is not always economically viable to develop brownfield land due to physical constraints and past contamination. Equally, the Council's intention to use Compulsory Purchase Powers (CPO) for the acquisition of land is both expensive and time consuming, which would result in the delay in delivery of housing and, similarly, introduce uncertainty to the delivery of housing. The CPO process is complex requiring to take into account incumbent legal factors such as leases, multiple ownership before even considering the planning application process itself. Consequently, delivery of the 142no sites identified in the Plan's preferred Option within the corresponding period to 2032 is not justifiable. Indeed, given the existing and active employment nature of many of these sites, the very ethos underpinning this approach involving relocation and/or potential closure is highly questionable notwithstanding the lack of deliverability. Moreover,

Customer Ref:	00092 Response Ref:	ANON-KU2U-GPVS-7	Supporting Info	
Name	Antony Duthie		Email aduthie@cla	arendonpd.co.uk
Response Type	Agent / Consultant			
On behalf of:	Barratt David Wilson Homes (BDW)	-		
	Option 2, concurrently with the above support the release of strategic sites, planning and technical consents. It is that additional greenfield sites are into the blended approach identified as O aforementioned disparity and shortfatorward over the next decade. The use over the prescribed period up to 203 allocated to meet the 67,174 HST, as	e, BDW consider that this approa it must be recognised that, by the therefore a highly ambitious con- evitably required if hosing need a ption 3 would be the most suita all in calculations). Such an appra- se of such a strategy would deliv 2. However, to recapitulate, this promoted in the above section.	ach would, if delivered, only preir very nature, large scale sintention that these sites would and demand is to be met with ole and pragmatic strategy fo each would use a combination of the full supply and range of support is caveated by the fall line with the Scottish Government.	additional requirement (52,837 homes). In terms of provide c50% of the housing requirement. Although BDW ites have longer lead-in times associated with securing ld deliver the required homes by 2032. Again, BDW stress hin Edinburgh. In principle, it is submitted by BDW that for the delivery of the housing requirement (save the fin of brownfield and greenfield sites that would come of homes that is required to be provided within Edinburgh fact that significantly more greenfield land will need to be the ernment's aspirations, and as directed by SPP, if the Plan is ons are required to cater for need within the Plan period.
Choice	12 B1			
Do you support o	r object to any of the proposed greer	nfield areas? (Please tick all that	apply) - Support Greenfield	- Support - Calderwood
Short Response Explanation	Not Answered			
Choice	12 B2 r object to any of the proposed greer	nfield areas? (Please tick all that	annly) - Sunnort Greenfield	- Support - Kirkliston

Short Response Not Answered

Explanation

Customer Ref:	00092	Response Ref:	ANON-KU2U-GPVS-7	Suppo	orting Info			
Name	Antony Duthi	е		Email	aduthie@cl	larendonpd.co.uk		
Response Type	Agent / Cons	ultant						
On behalf of:	Barratt David	Wilson Homes (BDW)						
Choice	12 B3							
Do you support o	r object to any	of the proposed green	field areas? (Please tick all tha	it apply) - Suppo	ort Greenfield	d - Support - West Edinburgh		
Short Response Explanation	Not Answered							
Choice	12 B4							
Do you support o	r object to any	of the proposed green	field areas? (Please tick all tha	it apply) - Suppo	ort Greenfield	d - Support - East of Riccarton	ı	
Short Response Explanation	Not Answered							
Choice	12 B5							
Do you support o	r object to any	of the proposed green	field areas? (Please tick all tha	it apply) - Suppo	ort Greenfield	d - Support - South East Edinb	urgh	
Short Response Explanation	Not Answered							

Customer Ref:	00092 Response Ref: ANON-KU2U-GPVS-	Supporting Info
Name	Antony Duthie	Email aduthie@clarendonpd.co.uk
Response Type	Agent / Consultant	
On behalf of:	Barratt David Wilson Homes (BDW)	
Choice	12 B6	
Do you support o	r object to any of the proposed greenfield areas? (Please t	ck all that apply) - Support Greenfield - Object - Calderwood
Short Response	Not Answered	
Explanation		
Choice	12 B7	
Do you support o	r object to any of the proposed greenfield areas? (Please t	ck all that apply) - Support Greenfield - Object - Kirkliston
Short Response	Not Answered	
	Not Answered	
Short Response Explanation	Not Answered	
	Not Answered	
	Not Answered 12 B8	
Explanation Choice	12 B8	ck all that apply) - Support Greenfield - Object - West Edinburgh
Explanation Choice	12 B8	ck all that apply) - Support Greenfield - Object - West Edinburgh
Explanation Choice Do you support of	12 B8 r object to any of the proposed greenfield areas? (Please t	ck all that apply) - Support Greenfield - Object - West Edinburgh
Choice Do you support of Short Response	12 B8 r object to any of the proposed greenfield areas? (Please t	ck all that apply) - Support Greenfield - Object - West Edinburgh
Explanation Choice Do you support of	12 B8 r object to any of the proposed greenfield areas? (Please t	ck all that apply) - Support Greenfield - Object - West Edinburgh

Customer Ref:	00092 Response Ref: ANON-KU2U-GPVS-7	Supporting Info
Name	Antony Duthie	Email aduthie@clarendonpd.co.uk
Response Type	Agent / Consultant	
On behalf of:	Barratt David Wilson Homes (BDW)	
Choice	12 B9	
Do you support o	r object to any of the proposed greenfield areas? (Please tick all that	apply) - Support Greenfield - Object - East of Riccarton
Short Response	Not Answered	
Explanation		
Choice	12 B10	
Do you support o	r object to any of the proposed greenfield areas? (Please tick all that	apply) - Support Greenfield - Object - South East Edinburgh
Short Response	Not Answered	
Explanation		
Choice	12 BX	
Do you support o	r object to any of the proposed greenfield areas? (Please tick all that	apply) - Explain why
Short Response	Not Answered	
Explanation	land at Cockburn Crescent, Balerno is a greenfield site that is suitable	field sites considered suitable for housing development. It is our BDW's submission that for housing development. This site is discussed in below but, in summary, is (i) adjacent odes and not reliant upon car travel; (iii) is within walking distance to the local

Customer Ref:	00092	Response Ref:	ANON-KU2U-GPVS-7	Suppo	rting Info			
Name	Antony Duthi	e		Email	aduthie@cla	rendonpd.	co.uk	
Response Type	Agent / Consu	ultant						
On behalf of:	Barratt David	Wilson Homes (BDW)						
Choice	12 C							
Do you have a gre	enfield site yo	u wish us to consider i	n the proposed Plan? - Greenfi	eld file upload				
Short Response	Yes							
Explanation								
Choice	12 C							
Do you have a gre	eenfield site yo	u wish us to consider i	n the proposed Plan? - Greenfi	eld file upload				
Short Response	Yes							
Explanation								
Choice	12 C							
Do you have a gre	eenfield site yo	u wish us to consider i	n the proposed Plan? - Greenfi	eld file upload				
Short Response	Yes							
Explanation								

Customer Ref:	00092	Response Ref:	ANON-KU2U-GPVS-7	Suppo	orting Info		
Name	Antony Duthi	е		Email	aduthie@c	clarendonpd.co.uk	
Response Type	Agent / Consu	ultant					
On behalf of:	Barratt David	Wilson Homes (BDW)					
Choice	12 D						
Do you have a br	ownfield site yo	ou wish us to consider	in the proposed Plan? - B	rownfield sites uploa	d		
Short Response	No						
Explanation							
Choice	13 A						
			for social enterprises, sta agree with this? - Yes / N	•	ourism, innov	vation and learning, and the low carbo	n sector, where there
	.o 800a 810 W.	Tor Lamburgin Do you	agree with this. Tesy it				
Short Response	Not Answered						
Explanation	Not Answered						
Explanation	NOTALISWEICU						
Choice	14 A						
			= -		_	d accommodate the development of a r ture uses within West Edinburgh withou	
	_	this approach? - Yes /		allows a wide collside	ration of fut	ture uses within west Lumburgh withou	at being ded to
							,
Short Response	Not Answered						
Explanation	Not Answered	1					

Customer Ref:	00092 Response Ref: ANON-KU2U-GPVS-7	Supporting Info
Name	Antony Duthie	Email aduthie@clarendonpd.co.uk
Response Type	Agent / Consultant	
On behalf of:	Barratt David Wilson Homes (BDW)	
Choice	14 B	
		round site to the south of the A8 at Norton Park and allocate the site for other uses. Do
you agree with th	nis approach? - Yes / No	
•	Not Answered	
Explanation	Not Answered	
Choice	14 C	
•	n 2030 to allocate the Airport's contingency runway, the "crosswing you agree with this approach? - Yes / No	ds runway" for the development of alternative uses next to the Edinburgh Gateway
Short Response	Not Answered	
Explanation	Not Answered	
Choice	1F A	
Choice	15 A	
	investe was the national (town control first) annuage. City Dian 2020	Will protect and appears the city control on the project Contland
	inue to use the national 'town centre first' approach. City Plan 2030 ng, commercial leisure, and entertainment and tourism activities. D	will protect and enhance the city centre as the regional core of south east Scotland to you agree with this? - Yes / No
providing shopping		
providing shopping	ng, commercial leisure, and entertainment and tourism activities. D	
providing shopping Short Response	ng, commercial leisure, and entertainment and tourism activities. D	

Customer Ref:	00092	Response Ref:	ANON-KU2U-GPVS-7	S	upporting Info				
Name	Antony Duthie			Е	mail aduthie@c	larendonpd.	.co.uk		
Response Type	Agent / Consultan	t							·
On behalf of:	Barratt David Wils	on Homes (BDW)							
Choice	15 B								
	•	•	lowed within our town a mitted only in areas who					•	-
Short Response	Not Answered								
Explanation	Not Answered								
Choice	15 C								
	•		including the potential the outcomes of the City			•	ges where the	ey support wal	king and cycling
Short Response	Not Answered								
Explanation	Not Answered								
Choice	15 D								
balance of uses w	ithin our centres to	maintain their vi	entary guidance for our t tality, viability and delive do you support? - Yes /	er good placemak		•		-	
Short Response	Not Answered								
Explanation	Not Answered								

Customer Ref:	00092 Response Ref: ANON-KU2U-GPVS-7	Supporting Info
Name	Antony Duthie	Email aduthie@clarendonpd.co.uk
Response Type	Agent / Consultant	· · · · · · · · · · · · · · · · · · ·
On behalf of:	Barratt David Wilson Homes (BDW)	
Choice	15 E	
We want to supporthis approach? - Y		r locations with good public transport access throughout Edinburgh. Do you agree with
Short Response	Not Answered	
Explanation	Not Answered	
Choice	15 G	
		or of alternative uses such as increased leisure provision and permit commercial centres
to accommodate	any growing demand. Do you agree with this approach? - Yes / No	
Short Response	Not Answered	
Explanation	Not Answered Not Answered	
LXPIAIIALIOII	NOT Allswered	
Choice	16 A1	
	nue to support office use at strategic office locations at Edinburgh F Do you agree? - Yes / No	Park/South Gyle, the International Business Gateway, Leith, the city centre, and in town
	, , ,	
Short Response	Not Answered	
Explanation	Not Answered	

Customer Ref:	00092	Response Ref:	ANON-KU2U-0	GPVS-7	Suppo	rting Info					
Name	Antony Duthie	2			Email	aduthie@cl	arendonpd	.co.uk			
Response Type	Agent / Consu	ltant									
On behalf of:	Barratt David	Wilson Homes (BDW)									
Choice	16 A2										
We want to supp	ort office develo	opment at commercia	l centres as the	se also provide	accessible locat	ions Yes /	No				
Short Response	Not Answered										
Explanation	Not Answered	· · · · · · · · · · · · · · · · · · ·									
											_
Choice	16 A3										
We want to stren	ngthen the requi	rement within the cit	y centre to prov	vide significant o	office floorspace	within majo	or mixed-us	se developments	. Do you agre	e? - Yes / No	
Short Response	Not Answered										
Explanation	Not Answered										
Choice	16 A4										
We want to ame	nd the boundary	of the Leith strategion	office location	to remove area	ıs with residenti	al developm	ent consen	t. Do you agree?	- Yes / No		
Short Response	Not Answered										
Explanation	Not Answered										
•											

Customer Ref:	00092	Response Ref:	ANON-KU2U-GPVS-7	Suppo	rting Info			
Name	Antony Duthi	е		Email	aduthie@cla	arendonpd	l.co.uk	
Response Type	Agent / Consu	ultant						
On behalf of:	Barratt David	Wilson Homes (BDW)						
Choice	16 A5							
We want to conti	nue to support	office development in	other accessible locations else	where in the u	ban area. Do	you agree	e? - Yes / No	
Short Response	Not Answered							
Explanation	Not Answered							
Choice	16 A5							
We want to conti consider in the pr		office development in	other accessible locations else	where in the u	ban area. Do	you agree	e? - Do you have an office	site you wish us to
Short Response								
Explanation								
Choice	16 B							
h		cations within Edinbur	gh with potential for office dev	relanment Day	ou agree witl	h this? - Va	es/No	
vvc want to ident	iny sites and lot	cations within Eambar	511 With potential for office dev	relopillent. Do y	ou agree with	11 (1113; 5 16	C3/ 140	
Chart Bosnons	Not Appropriate							
	Not Answered							
Explanation	Not Answered							

Customer Ref:	00092	Response Ref:	ANON-KU2U-GPVS-7	Supporting Info	
Name	Antony Duthie	9		Email aduthie@clarend	lonpd.co.uk
Response Type	Agent / Consu	ıltant			
On behalf of:	Barratt David	Wilson Homes (BDW)			
Choice	16 C				
use, unless existii	ng office space i	s provided as part of o	denser development. This wou	ld apply across the city to recogni	velopment of office buildings other than for office se that office locations outwith the city centre and 'policy only in the city centre Yes / No
Short Response	Not Answered				
Explanation	Not Answered				
Choice	16 E1				
We want to ident Support - Leith St			ss and industrial sites to provide	e necessary floorspace at the follo	wing locations. Do you agree? - Yes / No -
Short Response	Not Answered				
Explanation					
Choice	16 E2				
				no coccomi floringos et the fello	uving locations Do you agree? Ver / No
Support - Newbri		r new modern busines	ss and industrial sites to provide	e necessary hoorspace at the folio	wing locations. Do you agree? - Yes / No -
Short Response	Not Answered				
Explanation					

Customer Ref:	00092	Response Ref:	ANON-KU2U-C	GPVS-7	Supp	orting Info						
Name	Antony Duthie				Emai	l aduthie@cl	larendon	pd.co.uk				
Response Type	Agent / Consulta	ant			_							
On behalf of:	Barratt David Wi	ilson Homes (BDW)										
	·											
Choice	16 E3											
	ify proposals for n ighall Industrial Es	ew modern busines state.	s and industria	l sites to provid	e necessary flo	orspace at the	e followir	ng location	s. Do you a	agree? - Yes	s / No -	
Short Response Explanation	Not Answered											
Choice	16 E4											
We want to ident Support - The Cro		ew modern busines	s and industria	l sites to provid	e necessary flo	orspace at the	e followir	ng location	s. Do you a	agree? - Yes	s / No -	
Short Response Explanation	Not Answered											
Choice	16 E5											
	ify proposals for n rategic Business Co	ew modern busines entre	s and industria	l sites to provid	e necessary flo	orspace at the	e followir	ng location	s. Do you a	agree? - Yes	s / No - Do not	
Short Response Explanation	Not Answered											

Customer Ref:	00092 Response	Ref: ANON-KU2U-GPVS-7	Supporting Info	
Name	Antony Duthie		Email aduthie@clarendonpd.co.uk	
Response Type	Agent / Consultant			
On behalf of:	Barratt David Wilson Homes (BDW)		
Choice	16 E6			
We want to identi support - Newbrid		usiness and industrial sites to provi	ide necessary floorspace at the following locations. Do you agre	ee? - Yes / No - Do not
Short Response Explanation	Not Answered			
Choice	16 E7			
	fy proposals for new modern b ghall Industrial Estate.	usiness and industrial sites to provi	de necessary floorspace at the following locations. Do you agre	ee? - Yes / No - Do not
Short Response Explanation	Not Answered			
Choice	16 E8			
We want to identi support - The Cros		usiness and industrial sites to provi	ide necessary floorspace at the following locations. Do you agre	ee? - Yes / No - Do not
Short Response	Not Answered			

Explanation

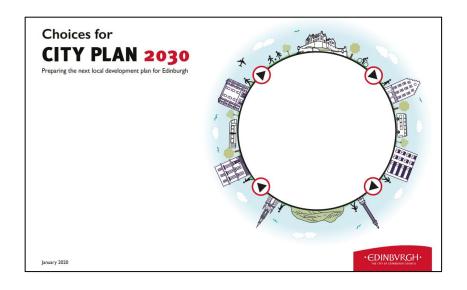
Customer Ref:	00092 Response Ref: ANON-KU2U-GPVS-7	Supporting Info
Name	Antony Duthie	Email aduthie@clarendonpd.co.uk
Response Type	Agent / Consultant	
On behalf of:	Barratt David Wilson Homes (BDW)	
Choice	16 EX	
We want to ident	tify proposals for new modern business and industrial sites to prov	ide necessary floorspace at the following locations. Do you agree? - Explain why
Short Response	Not Answered	
Explanation	Not Answered	
Choice	16 F	
	·	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 bu	urban sites and considered in Place Briefs for greenfield sites. We want to set out the siness space, and how to deliver it, including the location on-site, and considering
amount expected	·	
amount expected adjacent uses, se	d to be re-provided, clearer criteria on what constitutes flexible burvicing and visibility. Do you agree? - Yes / No	
amount expected adjacent uses, se	to be re-provided, clearer criteria on what constitutes flexible burvicing and visibility. Do you agree? - Yes / No Not Answered	
amount expected adjacent uses, se	d to be re-provided, clearer criteria on what constitutes flexible burvicing and visibility. Do you agree? - Yes / No	
amount expected adjacent uses, se Short Response Explanation	to be re-provided, clearer criteria on what constitutes flexible burvicing and visibility. Do you agree? - Yes / No Not Answered Not Answered	
amount expected adjacent uses, se Short Response Explanation	to be re-provided, clearer criteria on what constitutes flexible burvicing and visibility. Do you agree? - Yes / No Not Answered Not Answered 16 G	siness space, and how to deliver it, including the location on-site, and considering
amount expected adjacent uses, se Short Response Explanation	to be re-provided, clearer criteria on what constitutes flexible burvicing and visibility. Do you agree? - Yes / No Not Answered Not Answered 16 G	
amount expected adjacent uses, se Short Response Explanation Choice We want to conti	to be re-provided, clearer criteria on what constitutes flexible burvicing and visibility. Do you agree? - Yes / No Not Answered Not Answered 16 G inue to protect industrial estates that are designated under our cu	siness space, and how to deliver it, including the location on-site, and considering
amount expected adjacent uses, se Short Response Explanation Choice We want to conti	to be re-provided, clearer criteria on what constitutes flexible burvicing and visibility. Do you agree? - Yes / No Not Answered Not Answered 16 G inue to protect industrial estates that are designated under our cu	siness space, and how to deliver it, including the location on-site, and considering
amount expected adjacent uses, se Short Response Explanation Choice We want to conti	to be re-provided, clearer criteria on what constitutes flexible burvicing and visibility. Do you agree? - Yes / No Not Answered Not Answered 16 G inue to protect industrial estates that are designated under our cu	siness space, and how to deliver it, including the location on-site, and considering
amount expected adjacent uses, se Short Response Explanation Choice We want to continue Short Response	to be re-provided, clearer criteria on what constitutes flexible burvicing and visibility. Do you agree? - Yes / No Not Answered Not Answered 16 G inue to protect industrial estates that are designated under our cu	siness space, and how to deliver it, including the location on-site, and considering

Customer Ref:	00092	Response Ref:	ANON-KU2U-GPVS-7	Supporting Info		
Name	Antony Duthie			Email aduthie@clare	ndonpd.co.uk	
Response Type	ype Agent / Consultant					
On behalf of:	Barratt David	Wilson Homes (BDW)				
Choice	16 H					
We want to intro	duce a policy th	at provides criteria fo	r locations that we would su	pport city-wide and neighbourhoo	od goods distribution hubs. Do you a	gree? - Yes / No
Short Response	Not Answered					
Explanation	Not Answered					

REPRESENTATION TO EDINBURGH CITY PLAN 2030 MAIN ISSUES REPORT - CHOICES FOR CITY PLAN 2030

In Support Of LAND AT COCKBURN CRESCENT, BALERNO, EDINBURGH

On Behalf Of BARRATT DAVID WILSON HOMES



April 2020



CONTENTS

Section 1	Introduction
Section 2	Choices for City Plan 2030 - Comments
Section 3	Additional Greenfield Site – Cockburn Crescent, Balerno
Section 4	Greenfield Site Assessment – Cockburn Crescent, Balerno
Section 5	Conclusion
Appendix 1	Design Statement
Appendix 2	Transport Assessment
Appendix 3	Educational Assessment
Appendix 4	LVIA
Appendix 5	Flood Risk Assessment



SECTION 1 – INTRODUCTION

This Representation to the Edinburgh City Plan Main Issues Report – Choices for City Plan 2030 (Choices 2030) is made on behalf of Barratt David Wilson Homes (BDW) in respect of land at Cockburn Crescent, Edinburgh.

The Choices 2030 document sets out the Council's proposed changes to policy and objectives for the emerging City Local Development Plan 2030 (City Plan 2030). We have reviewed the proposed changes and provide our clients comments towards the relevant proposed amendments.

In response to the Council's 'Call' for the identification of any additional Greenfield sites that are considered suitable for future housing development, this Representation promotes our clients' interests at **Cockburn Crescent**, **Balerno**, for inclusion within the emerging City Plan 2030 as a future housing site. Section 4 assesses the site against the Council's Greenfield Assessment criteria, as provided in the Housing Study background document. The promotion of the land at Cockburn Crescent is supported by a number of specialist reports which confirm the site is both deliverable and suitable for residential development. The supporting reports are provided in the Appendix 1-5 of this representation and comprise:

- Design Statement
- Transport Assessment
- Education Assessment
- Landscape & Visual Impact Assessment
- Flood Risk Assessment & Drainage Strategy

SECTION 2 - CHOICES FOR CITY PLAN 2030

Choice 1 – Making Edinburgh a Sustainable, Active and Connected City.

Choices 2030 proposes to connect places, park and green spaces together as part of a city-wide green network. As a result, a policy is proposed for new development to connect to and deliver the proposed green network. Choices further seek to include a future policy requiring the provision of green and blue infrastructure, which includes trees, living roofs, nature-based drainage systems and ecosystem services. It is also proposed that specific areas (infrastructure) be identified which can be used for future water management e.g. trees living roofs SUDS and rain gardens. Choices 2030 proposes to introduce a new "extra-large green space standard of 5 hectares" for all new development areas, in order to allow new communities to access green spaces.

- **1A** The desire to connect the City with a network of multi-functional green spaces is generally supported by BDW albeit further detail is required.
- **1B** The aspiration to include green and blue infrastructure in new developments is also supported by BDW in cohort with its Group wide national mandate of reducing carbon emissions but, with the caveat, that same have to be both practical and affordable. Notwithstanding this support, the inclusion of green spaces and blue-green infrastructure provision within new developments should, however, be proportionate to the scale of the site and proposal and recognise that such an ambition may be difficult to deliver on smaller of brownfield sites for example and with cognisance to achieving density targets. In terms of SUDS, BDW are aware of instances of conflicting requirements between that of the Local Authority and Scottish Water particularly with regard to levels of surface water attenuation. Infrastructure provision must be informed by robust technical solutions and agreed in line with the respective requirements of SEPA and Scottish Water to facilitate adoption.
- **1C** In terms of the identification of areas that may be used for future water management, BDW would require further detail on this proposition to fully comment and, particularly, if this is to cross-over extant policy and guidance.
- **1D** In the interest of efficient use of urban land and meeting housing targets, BDW support the notion of a city-wide review and clarity in the respect of the development of poor quality or underused open space that may otherwise be unnecessarily protected.
- **1E** In terms of open space provision within new developments, again, BDW consider that this should be proportionate to the size and scale of the proposal and not an excessive 'blanket' requirement. Cognisance of site characteristics, location and existing neighbouring open space provision should be taken into account for example and Policy formation should allow inherent flexibility. As stated above, Choices 2030 proposes a new "extra-large green space standard" and suggests new development areas should provide 5ha of greenspace. Objectively, such a scale of green space would be equivalent to the size of the Meadows. It is considered that it would be disproportionate, and overly excessive, to require the provision of such a significant amount of green space within all new development areas. It is also questioned whether such a significant amount of open space would be fully utilised by future residents.

- **1F** BDW support the identification of land for allotments and food growing but such an aspiration must be objectively balanced with the development plan's concurrent objectives such as housing targets and increased density requirements.
- **1G** BDW support the provision of sufficient cemetery and related land, however, if ground is in private ownership, the landowner obviously needs to be in agreement and/or may have alternative aspirations. Preference should first be afforded to land already vested with the Local Authority.
- **1H** BDW support policy directive that seeks to ensure long term maintenance of green space. In line with BDW practice, the best solution for delivery of same is through private Factoring Agreements whereby the residents of homes, whom directly benefit from such provision, carry an equitable financial burden and interest in maintenance.

Choice 2 – Improving the Quality, Density and Accessibility of Development

Choices 2030 proposes all new development to incorporate measures that address climate change and allow accessibility for people with varying needs, age and mobility. Choices 2020 also proposes to change the existing housing density requirement to a minimum requirement of 65 dwellings per hectare across the City for both urban and greenfield sites. It is also proposed that the existing design and layout policies be amended to ensure new developments deliver active travel and connectivity links. Finally, Choices 2030 require all new developments to provide quality open space and public realm which could be used for a range of activities including draying space.

- **2A** The requirement for all new development proposals to address climate change and accessibility issues is supported BDW if reasonable and equitable.
- **2B** BDW support the maximisation and efficient use of land consistent with their longstanding contribution to housing development in the City to date. However, the requirement for an increase density ratio of 65 dwellings per hectare for greenfield sites is not accepted.

The increase in housing density requirements would effectively double the current requirement of 30 units per hectare as expected by the adopted Edinburgh City Local Development Plan. The suitability of this hugely ambitious density for greenfield developments is questioned, especially in relation to sites that are located on the edge of settlements. In many situations the proposed high-density requirement would be at the cost of good design and the creation of placemaking and would be in direct conflict with the requirements of Scottish Planning Policy. Such a density requirement would also reduce the variety and range of homes that could be provided and would result in more terraced and flatted accommodation being built. Larger detached family housing with gardens, which are reflective of existing properties within the suburban area, would be more difficult to provide if the higher density ratio was enforced. This, in turn, would have significant knock-on implications on the overall range of housing offered within the City and would likely result in migration of families to other Lothian authority areas in search for family type housing in line with market demand.

Similarly, a blanket approach to site coverage would fail to take into account site specific considerations such as technical parameters, cultural designations and the like. Inherently, all

sites have their own set of constraints and opportunities. To reiterate, BDW support the efficient use of land but, rather than employing an overly restrictive approach, developers should demonstrate efficiency through their design whilst responding to site specific considerations that a 'catch all' policy cannot do.

2C – BDW support active travel and connectivity as the existing Development Plan policies already encourage. Further detail is thus required as to what changes in policy are envisaged.

2D – BDW support the delivery of quality open space, however, a consistent approach should be applied to not just private housing developments but affordable and indeed student housing, the latter of which have, to date, often lacked adequate open space provision.

Choice 3 – Delivering Carbon Neutral Buildings

Choices 2030 requires all new buildings within Edinburgh to reduce their carbon emissions both through their design and use of low and zero carbon generating technologies.

3A – The ambition to deliver more energy efficient dwellings through design and associated infrastructure provision is supported by BDW. Indeed, as a National Developer, BDW have committed to reduce direct carbon emissions from its business by 29% by 2025 and, concurrently, cut indirect emissions by 11% by 2030. However, it is submitted that emissions standards for new buildings should continue to be the responsibility of the building standards regulatory system and not the planning system. In this regard, the proposed City Local Development Plan 2030 should include an 'aim' of achieving carbon neutral buildings, and not be a specific planning policy requirement so as to avoid conflict with national directive and, moreover, ensure consistency.

Choice 4 – Creating Place Briefs and Supporting the Use of Local Place Plans in Our Communities

Choices 2030 proposes joint working with local communities to produce 'Place Briefs' for all new housing sites, which will outline the design and layout of development and required transport, education and healthcare infrastructure. Choices 2030 also proposes to make Local Place Plans more collaborative and inclusive. Choices 2030 also advises that the Council encourage Local Place Plans to be prepared by local communities.

4A - In terms of Place Briefs, it is submitted by BDW that, the preparation of such Plans should be required for major strategic sites *only* and should not be a requirement for local development sites under 2 hectares. Place Briefs should also be prepared in conjunction with professional consultants who can provide expert advice and evidence on technical matters such as education, transport and infrastructure provision. Such issues cannot be solely left to local communities who do not have the professional expertise to consider the full ramifications of a development. It is also essential that developers and landowners are involved in the preparation of the Place Briefs, as this will guide the build rates and delivery times for new

developments. If the preparation of Place Briefs is left solely to local communities, they could be based on emotive interpretation of relevant issues and not factual evidential information or professional calculation.

4B - With regard to Local Place Plans, the new Planning Act allows for such Plans to be prepared by local communities and set proposals for development of land of particular local significance. However, as a prerequisite, the proposed City Local Development Plan 2030, and any related policy, should be clear that Local Place Plans are not a tool to prevent development. Any future policy must also clearly state that Local Place Plans should adhere to the housing land supply requirements and associated allocated housing sites. Again, Local Place Plans should be informed by professional expert advice relating to technical matters and infrastructure provision e.g. education, transport etc.

Choice 5 – Delivering Community Infrastructure

Choices 2030 proposes to direct development to areas where there is existing infrastructure (education, healthcare and transport infrastructure) or where new infrastructure will be accommodated. Choices 2030 require the proposed City Plan 2030 to identify what new community facilities are required and that all new facilities are well connected to active travel or are in highly accessible locations with good sustainable public transport services. Subsequently Choices 2030 propose to co-locate community services close to the communities they serve, in order to support a high walk-in population and reduce the need to travel. Choices 2030 proposes to identify where development will be expected to contribute towards new or expanded community infrastructure. As a result, cumulative contribution zones are suggested to determine the actions, costs and delivery mechanism. Choices further also proposes to disband the use of Supplementary Guidance for developer contributions in favour of setting out appropriate guidance within the City Plan 2030, Action Plan and other non-statutory guidance.

- **5A** -The broad aim of directing new development to locations that have infrastructure capacity, or where additional capacity can be accommodated, is supported by BDW.
- **5B** It is also generally supported by BDW that new development should be in well-connected accessible locations that are within walking distance of local community facilities.
- **5C** The co-location of community services is, in principle, supported by BDW, subject to services being required.
- **5D1** The principal of new developments' contribution towards infrastructure is supported by BDW, subject to same being justifiable and equitable to the net burden derived from the development. Requirements should thereby comply with the terms of Planning Circular 3/2012- Planning Obligations. This Circular requires developer contributions to be proportionate to the proposed development.
- **5D2** The proposal to use cumulative contribution zones to determine infrastructure actions, costs and delivery mechanisms is not supported by BDW. Methodology needs to be clear and transparent and apply to not just residential development but other proposed uses and align with Circular 3/2012 (per **5D1** above).

5E – BDW support the proposal to remove Supplementary Guidance for developer contributions, in line with the Planning Act and hope that the removal of such guidance will simplify planning processes. Developer contributions have an increasingly significant impact upon development viability and should thus form a key component of the development plan itself in the interests of transparency, deliverability and scrutiny.

Choice 6 – Creating Places the Focus in People Not Cars

Choices 2030 aims to ensure that new development is focused on accessibility by public transport, walking and cycling and not cars. Subsequently, the Choices 2030 proposes a new policy that requires Place Briefs to assess development proposals against its ability to meet set public transport, walking and cycling targets.

6A – While the ambition to decrease dependence on cars is fully acknowledged by BDW, the key to a reduction in car travel is inherently enabled through the provision of quality public transport system and connectivity into existing footpaths and cycleways. Furthermore, there must be cognisance to the fact that the majority of households will still wish to retain a car for multiple trip journey's and longer distance travel.

6B – As above, BDW support the generic thrust of encouraging sustainable travel patters but car usage will prevail for most households when alternative modes are not always an option. Car parking provision must also be carefully considered so as to avoid informal parking and conflict with other road users if supply, in practical reality, is inadequate.

Choice 7 – Supporting the Reduction in Car Use in Edinburgh

In summary, Choices 2030 states a desire for the City Plan 2030 to have no minimum car parking standards, which in turn results in an ambition to result in car-free developments. It is proposed that parking levels within new developments are based on targets for trips that can be undertaken by walking, cycling and public transport.

7A – As stated above (6B), BDW consider that the key to reducing car usage in Edinburgh is the provision of new and improved public transport and interaction with active modes of transport. Without an improvement to public transport, the required modal shift from cars is unlikely to happen. Equally, as also stated above, while the aim of achieving car-free developments is admirable, the emerging City Local Development Plan 2030 must recognise that the majority of households will inevitably wish to retain a car to enable multiple trip journeys and longer distance travel.

7B – No comment.

7C – BDW consider further detail is required on what may be proposed in terms of controlling parking and how this will be informed by, for example, by whether supporting alternative infrastructure is in place.

7D – BDW support the use of park and ride and the identification of sites for this purpose, however, further detail is required to enable meaningful comment.

Choice 8 – Delivering New Walking and Cycling Routes

Choices 2030 advises that delivering strategic walking and cycling routes across the city is key to the delivery of achieving a carbon neutral city. Subsequently, Choices 2030 proposes to update the existing policy on cycle and footpath network and include a criterion for the identification of new routes.

8A – The aim to provide new walking and cycling routes is supported by BDW. It is submitted that a review of the entire cycle/footpath network within the City should be undertaken, and where deficiencies or improvements can be identified, then these should be highlighted. Any request for new development to contribute to the provision of new walking or cycling routes should be equitable and relevant to the development proposal, as well as meeting all the tests of Circular 3/2012.

8B – BDW support the provision of additional strategic walking and cycling routes.

8C – BDW support the safeguarding of active travel links within allocated sites subject to same being deliverable.

Choice 9 – Protecting Against the Loss of Edinburgh's Homes to Other Uses

Choices 2030 highlights the loss of permanent homes to short-term lets and suggests the City Plan 2030 contains a policy that strikes a balance between the needs of residents and visitors.

9A – BDW supports consultation on the control of short-term lets.

9B – Without further detail on policy content it is not possible for BDW to meaningfully comment on a policy regarding loss of homes to alternative uses.

Choice 10 – Creating Sustainable Communities / Ensuring the Better Use of Land

Choices 2030 proposes the introduction of a policy that requires the provision of all sites over 0.25 hectares to include an element of housing. Such a policy would relate to all sites that proposes student housing, short stay commercial visitor accommodation and other commercial business, retail and leisure developments. The policy would require the provision of at least 50% of the site to provide housing.

10A – BDW do not have comments on the scale or location of student housing.

10B – BDW do not support a policy that requires housing on all sites over a certain size. Such a policy would be overly restrictive and unreasonable for the emerging Proposed City Plan to impose. While the principal of mixed-use is supported by BDW, site context and location must be considered. The universal suggestion for the provision of housing on all sites over 0.25ha is not supported.

10C – BDW support the principle of a policy to promote redevelopment of out of centre retail units and commercial centres for mixed uses.

Choice 11 – Delivering More Affordable Homes

Choices 2030 proposes to increase the supply of affordable homes to 20,000 by 2030. It advises that the most efficient way to increase the supply of such homes is through sustainable mixed communities, with minimal green belt release. Choices 2030 subsequently proposes a change in policy for the proposed City Plan 2030, which will increase the requirement for affordable housing provision from 25% to 35% for all developments over 12 residential units. Choices 2030 also proposes a specific planning policy that dictates the mix of housing types and tenures for all new housing developments.

11A – The proposed change from delivering 25% affordable housing land requirement to 35% is not supported by BDW as a general rule. In particular, such a change in affordable housing provision is contrary to existing Scottish Planning Policy (SPP) which confirms that the level of affordable housing required as a contribution within a market site should be no more than 25% of the total numbers of houses (SPP - Paragraph 129). Given the conflict with Scottish Government Policy, it is considered that the required level of affordable housing provision within a development site should, consistently, remain as 25%.

While the provision of a mix of housing types and tenures on new development sites is generally favored, BDW consider it unreasonable to apply prescriptive targets for the mix of market housing through a specific planning policy. In this respect, it is important to allow enough flexibility to respond to variation in demand over time and across different locations. The requirement for flexibility is consistent with SPP which states "Planning can help to address the challenges facing the housing sector by providing a positive and flexible approach to development." (Paragraph 109).

BDW has built approximately 2,000 homes in the City of Edinburgh Local Authority area in the last 5 years. Of those approximately 570 were affordable. BDW have a further 1,780 homes with planning permission on both green and brownfield sites that have commenced work and 469 of these will be affordable homes. Demonstrably, BDW are evidently committed to delivering a range of both market and affordable housing in Edinburgh, however, do not support an increase in the affordable requirement from 25% to 35% for the following reasons:

- The LDP is being prepared under current legislation, within the overarching context of SPP being still in place as the extant National Policy which is clear in its directive stating that the affordable housing requirement should be no more than 25%.

- Affordable housing demand is clearly a product and result of historical undersupply across all tenures. Unless the whole housing requirement is planned for and met, affordability issues will perpetuate, regardless of the affordable target. In order to deal with a shortfall in affordability, a Development Plan that allocates a range and choice of housing sites is more likely to ensure delivery of the homes required to meet the needs of the population. A range of brownfield and greenfield sites, of varying sizes and in different locations, will allow the market to deliver the homes required to meet housing need across all tenures within the Plan period.

11B – BDW support an approach that allows a broad range of type and tenure of homes to be included in the affordable proportion of homes in developments. However, where a strict prescriptive approach to the proportion of different types is adopted, this can impede viability, delivery timescales and design. Developers work with RSL's to meet their needs which, in BDW's experience, is 1, 2 & 3 bedroom homes irrespective of the private mix of the wider site. Universally applying a representative mix will reduce site densities restricting overall provision of housing contrary to the wider aspirations of the development plan.

Choice 12 – Building our New Homes and Infrastructure

How many new homes does Edinburgh need?

12A – BDW recognises the unique policy context for the preparation of the City Plan 2030. It is accepted that LDPs in areas covered by a Strategic Development Planning Authority (SDPA) are required to be produced shortly after the Strategic Development Plan (SDP) has been adopted. However, the latest SDP that covers Edinburgh City was adopted in 2013 and does not include housing targets broken down by Local Authority beyond 2024. It is accepted that the new Planning (Scotland) Act 2019 has no requirement for the production of SDP's and, as a consequence, housing requirement will be set by National Planning Framework 4 (NPF4). It is acknowledged that NPF4 is not expected to be approved until late 2021. On this basis, due to the lack of up-to-date housing requirement figures, it is understood that Choices 2030 utilised the updated Housing Need and Demand Assessment 2 (HNDA2) as a basis to calculate the housing requirements for the City up to 2032.

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

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

BDW submits that both options fall significantly short of meeting the required housing need and demand in full. The Preferred Option would meet just 65% of identified need and demand in the HNDA 2 Wealth Distribution Scenario once completions to 2019 are accounted for. While the Alternative Option would meet 79% of identified need and demand in the HNDA 2 Wealth Distribution Scenario, or 65% of the Strong Economic Growth Scenario.

Choices 2030 or the Housing Study do not adequately justify why housing need and demand identified in HNDA2 cannot be met in full. This is a significant issue within the context of an historic severe undersupply of housing and housing land in Edinburgh and merits further serious attention. Subsequently, BDW are of the robust opinion that, the housing supply targets proposed in Choices 2030, have been fundamentally based on an inadequate consideration of relevant evidence.

It is noted by BDW that, the Alternative Option of 52,800 homes, is discounted by the Housing Study on the reasoning that the supporting evidence to the HNDA suggests the Strong Economic Growth Scenarios were unrealistic. However, this evidence was produced over 7 years ago in 2013 (Oxford Economics reference) and applied to the *whole* SESPlan region. It is considered the conclusion relating to the economic growth of the City are thus dated and are not relevant to Edinburgh's economic position in 2020, or for the proceeding decade to 2030.

It is fact that the population of Edinburgh increased by 13% between 2008-18 (or 6,000 people per year) and is continuing to grow at this rate. This level of growth is nearly 3 times the rate of change in Scotland's population over the same period. Furthermore, Edinburgh topped the Lambert Smith Hampton (2019) Vitality Index, which assessed 66 UK towns and cities, and reflected strong wage growth, as well as house price growth. Additionally, private housing completions within Edinburgh and the Lothians are currently at record high levels; this is despite housing completions in Scotland, as a whole, remaining below the pre-recession peak. Similarly, neighbouring Lothian authorities are experiencing building rates in excess of pre-recession levels. Indeed, private completions in Midlothian for the year to Q3 2019 are 358% higher than the annual pre-recession average and 77% higher in East Lothian. This demonstrates the strength of the Lothian market and the increase in housing delivery which is possible when land is made available.

BDW supports a combination of brownfield and greenfield allocations as set out in Option 3 but not at the levels proposed. Inevitably, it is BDW's contention that significantly more greenfield land will need to be allocated than intimated by Option 3. This is compounded by an unrealistic anticipation (and lack of supporting information) of delivery from urban sites over the Plan period. Even if the optimistic delivery of 11,000 homes on the brownfield sites was possible as hoped for in Option 3, greenfield release of approximately 28,000 homes as outlined in Option 2 would be necessary. It is BDW's view that large scale greenfield release, similar to the amount contemplated in Option 2, will be required. However, the changes to the Plan should also consider options to expedite short-term housing delivery facilitated via the introduction of a range of smaller greenfield sites to augment the housing land supply with their inherently shorter lead-in time when compared to strategic sites. As set out above we consider this will need to be augmented with some smaller greenfield sites deliverable in the short term.

More housing land is thus required and the methodology for same should be correctly drawn from Scottish Planning Policy (SPP). In this respect, BDW draw reference to paragraphs 119/120 and Diagram 1 of SPP. In this respect, BDW consider that the amount of new housing allocations required should be calculated by subtracting existing "sites which are effective or expected to become effective in the plan period" (Paragraph. 119/120) from the Housing Land Requirement and allocate additional land to make up any shortfall between.

In this respect, SPP (Paragraph 113) stipulates that Plans must be informed by a robust housing need and demand assessment (HNDA). In this case, HDNA2 is the most up to date

assessment and should therefore be the basis for quantifying the City Plan 2030's Housing Supply Target which, further, SPP states should "properly reflect" the estimate of housing demand (Paragraph 113). Concurrently, taking the above into account, succinctly, the true 'New Land Requirement' is correctly illustrated below.

HNDA (2019 – 2032)	67,174 units
Housing Supply Target	
(2019-32)	67,174 units
Housing Land Requirement	
(+ 10%)	73,892 units
Effective Supply	21,055 units
Remaining Land to be	
Allocated	52,837 units

Choices 2030 informs that the identification of land required to meet the Housing Supply Target could be done three ways:-

- Option 1 the Council 'identifies sites for 17,600 homes within the urban area, thus avoiding the use of greenfield sites.
- Option 2 the required housing target is delivered through market housing and a release of new land for 27,900 homes from the green belt, or
- Option 3 a blended approach, which would involve the provision of 11,000 homes on brownfield / urban land and release land 6,600 homes from the green belt.

Choices 2030 promotes Option 1, delivery through the Council and its partners, through the provision of brownfield land within the urban area, as the preferred option of delivering the required housing supply up to 2032.

In the first instance, following on from the above comments on HST, it is considered that the Council should confirm the actual housing supply target that is required by the emerging City Local Development Plan 2030. As stated above, it is considered that a significant higher housing land supply, of approximately <u>67,174 houses</u>, is required than indicated in Choices 2030.

In response to the Council's Preferred Option of delivering the required HST through brownfield sites within the urban area, **Option 1**, it is considered that this option is totally unrealistic. While the importance of reusing previously developed (brownfield) land is fully recognised as a key aim of the planning system, the reliance upon such land to provide a significant amount of housing is fundamentally questioned. This is fully illustrated by the fact that Choices 2030 Housing Study background document identifies a requirement for 275 hectares of urban land to meet the preferred housing target, however only 11 hectares of brownfield land is actually identified by Choices 2030 as being suitable for redevelopment for housing. Furthermore, it is not always economically viable to develop brownfield land due to physical constraints and past contamination. Equally, the Council's intention to use Compulsory Purchase Powers (CPO) for the acquisition of land is both expensive and time consuming, which would result in the delay in delivery of housing and, similarly, introduce

uncertainty to the delivery of housing. The CPO process is complex requiring to take into account incumbent legal factors such as leases, multiple ownership before even considering the planning application process itself. Consequently, delivery of the 142no sites identified in the Plan's preferred Option within the corresponding period to 2032 is not justifiable. Indeed, given the existing and active employment nature of many of these sites, the very ethos underpinning this approach involving relocation and/or potential closure is highly questionable notwithstanding the lack of deliverability. Moreover, numerically Option 1 proposes to deliver just 17,600 houses reflective a negligible 33% of the true additional requirement (52,837 homes).

In terms of **Option 2**, concurrently with the above, BDW consider that this approach would, if delivered, only provide c50% of the housing requirement. Although BDW support the release of strategic sites, it must be recognised that, by their very nature, large scale sites have longer lead-in times associated with securing planning and technical consents. It is therefore a highly ambitious contention that these sites would deliver the required homes by 2032. Again, BDW stress that additional greenfield sites are inevitably required if hosing need and demand is to be met within Edinburgh.

In principle, it is submitted by BDW that the blended approach identified as **Option 3** would be the most suitable and pragmatic strategy for the delivery of the housing requirement (save the aforementioned disparity and shortfall in calculations). Such an approach would use a combination of brownfield and greenfield sites that would come forward over the next decade. The use of such a strategy would deliver the full supply and range of homes that is required to be provided within Edinburgh over the prescribed period up to 2032. However, to recapitulate, this support is caveated by the fact that significantly more greenfield land will need to be allocated to meet the 67,174 HST, as promoted in the above section. In line with the Scottish Government's aspirations, and as directed by SPP, if the Plan is to comply, this need should, and cannot, be ignored. It is inevitable that further greenfield allocations are required to cater for need within the Plan period.

Do you have a greenfield site you wish us to consider in the proposed Plan?

12B – BDW note that Choice 12 calls for the promotion of any further greenfield sites considered suitable for housing development. It is our BDW's submission that land at Cockburn Crescent, Balerno is a greenfield site that is suitable for housing development. This site is discussed in below but, in summary, is (i) adjacent to the existing urban area of Balerno; (ii) accessible by active travel modes and not reliant upon car travel; (iii) is within walking distance to the local education and community facilities, and (iv) it is effective and available.

SECTION 3 - ADDITIONAL GREENFIELD SITE - COCKBURN CRESCENT, BALERNO

This Representation is to promote a future housing allocation for land directly adjacent to the western edge of the Balerno urban area at Cockburn Crescent. It is submitted in response to the Choices 2030 call for any alternative greenfield sites to be considered for inclusion within the proposed City Plan 2030.

The Council's Greenfield Site Assessment (Part 2b of the Housing Study) evaluated the subjects of this submission as part of a wider, and very much larger, area identified as Marchbank House. This inevitably 'broad brush' is approach is not considered correct in this instance and same ignores site specific characteristics and opportunities. The Cockburn Crescent site should be considered as a specific contained opportunity as it is quite different in character and, indeed, physically separated from the wider assessment area by virtue of topography and tree belts. It is contended, and demonstrated below (and with the support of appended expert assessments), that were the Assessment to consider the Cockburn Crescent site in isolation, it would be deemed an appropriate candidate greenfield site for housing.

Figure 1 below identifies the promoted Cockburn Crescent subjects within the context of the assessed area identified as Marchbank House. The Cockburn Crescent site is identified on Figure 1 in red and it located to the northern extremity of the identified Marchbank House area. Notably the Cockburn Crescent site is adjacent to the existing urban area, nestled between an existing shelter belt and the hard urban edge.

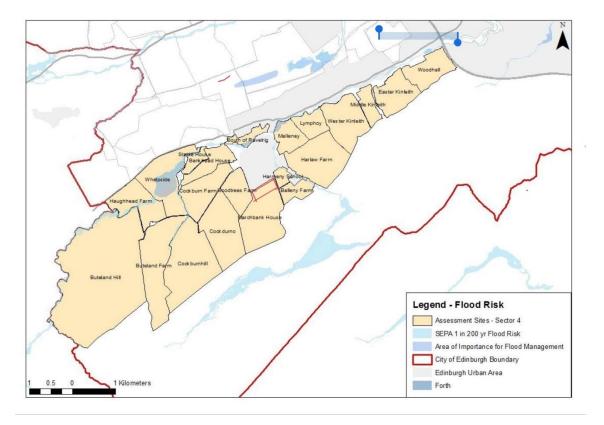


Figure 1 Plan showing Cockburn Crescent Site – (source Choices 2030 Housing Study Part 2b)

It is submitted that when the site at Cockburn Crescent is critically assessed against the Council's own set of Greenfield Site Assessment criteria, as outlined in the background document 'Housing Study (Part 2b) January 2020', it will be clear that it is (i) a logical extension to the existing Balerno settlement, and (ii) can be suitably absorbed into the existing environs and surrounding landscape. The following section will confirm that the site has no physical or infrastructure constraints to impede its development for housing. It is also deliverable in the short term – this is an important point given the conclusions relating to the Housing Supply Target for 2020-2032, as outlined in the above section and which clearly illustrate there is a requirement for significant additional housing land allocations.

The assessment in the proceeding section confirms that the Cockburn Crescent site is effective and can contribute to Edinburgh's sustainable growth over the period of the emerging City Local Development Plan 2030. Indeed, the site can be developed over the early stages of the LDP, e.g. over the next 5 years, and deliver approximately 200 units (including 25% onsite affordable housing), associated roads, landscape, open space, SUDS and footpaths.

Promoted Site – Cockburn Crescent

The subject site is located to the south of Cockburn Crescent and is outlined in red on Figure 2. It is situated on the southern edge of Balerno, approximately 7 miles west of Edinburgh City Centre. The site is in a sustainable location, being adjacent to the urban edge of Balerno and within walking distance of local services and amenities. The site is accessible by existing active travel links (footpaths and cycle routes) and by existing public transport service.



Figure 2 – Site Location

The subjects extend to approximately 12.5 hectares (31 acres) and comprises poor quality Class 4.2 non-prime agricultural land incorporating two fields split by a central tree line of

trees between the southern tree belt and Cockburn Crescent. The site falls gradually from south to north and Figure 3 illustrates the subjects' containment within the existing landscape structure and hard urban edge.



Figure 3 – Aerial photograph of Cockburn Crescent Site.

Proposed Development

The proposed development for the site at Cockburn Crescent is for residential use comprising up to c200no units (including 25% on-site affordable housing), associated roads, landscape, open space, SUDS and footpaths. It would form a logical southern extension to the Balerno urban area.

The proposed development is illustrated in the indicative site layout provided in Figure 4. The submitted Design Statement provided in Appendix 1 of this Representation details the background to the proposed housing layout for the site.



Figure 4 - Indicative Site Layout Masterplan

Landscape Framework

The indicative site layout illustrates how the proposed housing can be accommodated and absorbed within the existing landscape and road framework. The key elements of the proposed the landscape concept are shown in Figure 5 below and are:

- Retention and enhancement of the existing woodland edges and field boundaries.
- Creation of new 'green links' connecting the existing residential areas to new development.
- Utilising the landscape structure to define arrival points and ensuring positive integration with the existing residential area.
- The creation of a network of connected landscape features and new areas of public open space.
- Provision of opportunities for improved pedestrian connectivity in the area with new and improved path links.

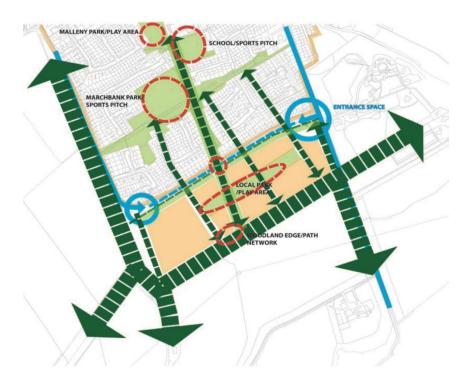


Figure 5 - Landscape Concept

SECTION 4 - GREENFIELD SITE ASSESSMENT - COCKBURN CRESCENT, BALERNO

The following assessment of the promoted site at Cockburn Crescent is based on the Greenfield Site Assessment as set out in the background Housing Study (Part 2b).

SDP1 SDA AREAS

While the promoted site at is not located within one of the Strategic Development Areas (SDA), as defined by the Strategic Development Plan, it is submitted that not every single site should be directed to the SDA, merely the majority. The promoted site at Cockburn Crescent provides an opportunity for a short-term site to come forward in the early period of the City Plan 2030 and, due to its size and scale, does not raise any strategic issues.

ACTIVE TRAVEL

Appendix 2 of this Representation provides a Transport Assessment (TA) that supports the proposed development. The conclusions of the TA informed the Masterplan for the site provided in Figure 4 above. Although this assessment will require updating, no significant changes to findings are anticipated. Of note, the Examination Reporter appointed to consider

the now extant Local Development Plan, noted that, in respect of the Cockburn Crescent subjects, "no overriding transport or accessibility issues that, of themselves, would justify refusal of the request for allocation of this site".

In line with the above, the TA clearly confirms that the development proposals for Cockburn Crescent will integrate with existing walking and cycling network within the surrounding area and provide for access to public transport (of note the existing bus terminus being located to the north east of the site with bus stops on Cockburn Crescent itself). This will ensure that the residents of the proposed development are given the opportunity to make informed travel choices and will be encouraged to undertake either active travel or travel by public transport.

• Does the site support travel by foot to identified convenience services? Does the site support travel by foot to identified employment clusters?

There are three vehicular T-junctions along the section of Cockburn Crescent which adjoin the subjects, namely Whitelea Road, Greenfield Crescent and Threipmuir Avenue. All three roads afford pedestrian access northwards via public footpaths to public open space and the Village centre. In addition, a footway runs along the north side of Cockburn Crescent with Core Path 19 following Mansfield Road to the east. Existing pedestrian walking facilities that run along the northern side of Cockburn Crescent.

Internally, the proposed residential roads will be designed to ensure that pedestrians have priority over the private. The development will be linked to the main pedestrian routes providing safe walking routes from the proposed site to the key amenities in Balerno, including the local shops, village centre, Dean Park Primary School and Balerno High School.

In support of the proposed site at Glenbrook Road, a "walking audit" was undertaken to establish the proximity to local services and employment clusters. Table 1 below provides a summary of the walking times to the local community facilities.

Destination	Approx. on-site walking journey time (minutes)	Approx. walking journey time based on national guidance (minutes)			
Nearest bus stops on Cockburn Crescent	1	2			
Bus terminus on Cockburn Crescent	4	5			
Dean Park Primary School	6	9			
Local shops on Mansfield Road	13	14			
Town Centre, including Post Office	15	17			
Balerno High School	18	20			
Additional facilities out with a 20 minute walk (for reference)					
Curriehill Railway Station	-	55			
Heriot-Watt University	-	75			

Table 1 - Walking times to community facilities

It can be concluded that the site would support active travel to local convenience services and local employment clusters.

Does the site have access to the wider cycle network?

Balerno currently benefits from its location close to existing cycle routes, which include the Water of Leith Walkway and the Forth and Clyde Cycle Route which forms part of National Cycle Route 75 (NCR75).

National Cycle Route 75 is located within the surrounding area and starts at Balerno High School. Cyclists from the proposed site would have to share the quite residential roads within the surrounding area until they reach the National Cycle Route at Balerno High school, which is a 3-minute cycle from the proposed site. NCR75 provides cycle access from Balerno to Edinburgh city centre.

Based on the Scottish Government Guidance, it is generally accepted that a 30 to 40-minute cycle journey time to centres of employment or other facilities is acceptable. In terms of the Cockburn Crescent site, such a cycle journey time would result in access to Heriot Watt University and the South Gyle Park employment node.

It can be concluded that the site does have access to the wider cycle network and that this network provides access to both local services and employment clusters.

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

As detailed above, the proposed residential development at Cockburn Crescent would provide safe pedestrian and cycle provision that could link-in with existing footpaths and the wider cycle network.

It is therefore concluded that the site can support active travel.

PUBLIC TRANSPORT

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

Contrary to the Greenfield Site Assessment, positively, the subject site is well-placed in relation to proximity to public transport facilities with existing Lothian bus service provision, E & M Horsburgh and Waverley Travel (services 24, 44A, N44 and X44) being provided on Cockburn Crescent and Malleny Avenue.

In addition to bus facilities, rail services should also be considered, as this provides access to Edinburgh City Centre to the east together with West Lothian and Glasgow to the west. The closest railway station to the promoted site is Curriehill station, which is located approximately 4.3km north east of the site. Lothian Bus service 44 provides a link from the site to Curriehill station. Equally, it is also possible to cycle to Curriehill Station from the site (this would involve a short 18-minute cycle).

It can therefore be concluded that the site is supported by existing public transport provision.

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

While the site is not identified as benefiting from one of the identified public transport intervention projects, it is highly accessible by foot and cycle networks, together with exiting public transport services, which will provide future residents of the development to undertake informed and sustainable travel choices.

COMMUNITY INFRASTRUCTURE

Appendix 3 of this Representation provides an Educational Assessment prepared in October 2015. The Report assessed the education capacity of the schools within the relevant school catchment area and considered the impact that the proposed residential development of an additional 150 units would have on the educational establishments.

Based on the Adopted Edinburgh Local Development Plan Educational Appraisal the proposed development would generate the following maximum pupil requirements if the site capacity was increased to 200no homes:-

- Primary School 52 pupils
- Secondary School 34 pupils.

In terms of non-denominational schooling the site at Cockburn Crescent falls within the catchment areas for Dean Park Primary School and Balerno Community High School. Dean Park Primary School has a capacity of 476 spaces, while Balerno Community High School has capacity for 850 spaces.

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

Based on the latest school roll projections for Dean Park Primary School, it is submitted that there is capacity within the primary school to accommodate the additional 52 pupils (max).

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

Based on the latest school roll projections for Balerno Community High School it is acknowledged that the school is projected to be slightly over capacity. Appropriate developer contributions could be provided as a result of development of the Cockburn Crescent site to address additional class provision.

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

The above paragraphs confirm there is capacity for the proposed development in terms of primary school provision. It has also been acknowledged that a small number of high school pupils will be generated by the development. It is recognised Balerno Community High School could be at capacity when the site is fully developed, however, this is subject to site

programming and BDW are willing to address any physical capacity issues on an equitable basis by way of proportional developer contributions.

It can be concluded that there is scope to accommodate the proposed development within the local primary and secondary schools.

LANDSCAPE CHARACTER

It is noted that, positively, the Greenfield Site Assessment acknowledges and, moreover, identifies scope to accommodate development (when focusing on the subjects of this submission rather than the wider landscape setting beyond the southern ridgeline) given 'existing shelterbelts and field boundary trees together with the opportunity to form new robust settlement boundaries'. Underscoring this, it is noted that when the subjects were assessed by the Reporter appointed to Examine the now extant Local Development Plan, this Report found that the site had "clear and defensible boundaries".

The site is within the wider Pentlands Special Landscape Area, a blanket designation in the adopted Local Development Plan which simply follows the settlement boundary. However, as noted above and within the accompanying LVIA, the subjects promoted for housing are on the urban edge, difference in landscape character to that beyond, and contained within a landscape envelop. The site is also within the Edinburgh Green Belt, as designated by the adopted Local Development Plan. Figure 6 identifies the landscape designation of the site.

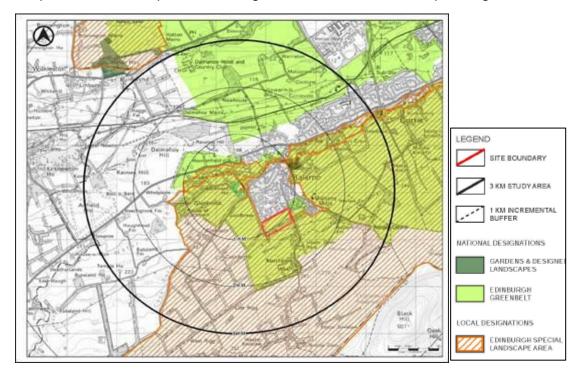


Figure 6 - Landscape Designations

A Landscape and Visual Impact Assessment (LVIA) has been prepared for the proposed development at Cockburn Crescent and is provided in Appendix 4 of this Representation. The LVIA has assessed the landscape and visual impact of the proposed residential development.

The assessment is based on a study area of 3km, which is in accordance with current best practice. Four key viewpoints were selected to represent the key receptors that had the potential to be impacted by the proposed development. Notably each of the key viewpoints were agreed with the City of Edinburgh Council Landscape Officer.

The LVIA confirms that there is landscape capacity for the proposed development with only a very localised impact from the agreed viewpoints. The LVIA further confirms that there are no significant effects predicted on the integrity of the surrounding landscape character or the SLA consistent with the Council's own assessment which acknowledges development capacity for this particular component of the Greenfield Assessment area. It also confirms that the proposal would not undermine the Green Belt objectives.

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

In terms of impact, the submitted LVIA provided in Appendix 4 of this Representation concludes that:

- The proposed development of Cockburn Crescent would be visually well contained to those receptors within and immediately adjacent to the site area.
- The location of the site adjoining the southern edge of Balerno ensures that the proposed housing relates to the existing dwellings, this together with the strong landscape concept strategy proposed for the development results in no significant effects on the local landscape character.
- Whilst the site sits on the very edge of a SLA, the visual containment of the proposed development as acknowledged by the Council's own assessment and its relationship with the settlement ensures that the effects on the SLA are limited to the site and the immediate surrounding area.
- There are no significant effects on the designated landscapes within the study area.
- There are no significant visual effects on any road, rail or recreational trail user.

The LVIA further concludes that in terms of planning policy and the Green Belt designation, the proposed development would not detract from the quality of the landscape setting of Balerno and that there would be no resulting coalescence.

It is therefore concluded that the proposed residential development of the Cockburn Crescent site would not result in any significant landscape or visual impact, or negatively affect the identity, character or landscape setting of Balerno, or result in coalescence.

GREEN NETWORK

• Would development of the site avoid significant loss of landscape scale land identified as being of existing or potential for the strategic green network?

The submitted LVIA in Appendix 4 confirms that the proposed development would not significantly affect the surrounding landscape or strategic green network but in fact make a

positive contribution. The potential for same is acknowledged by the Council's own Assessment.

FLOOD RISK

In support of the proposed residential development a Flood Risk Assessment (FRA) and Outline Drainage Strategy has been undertaken. This is provided in Appendix 5 of this Representation.

Would development of the site avoid identified areas of medium-high flood risk (fluvial) or areas of importance for flood management.

In accordance with the Council's own assessment, the site has no SEPA-identified areas of medium-high risk/for flood management.

SITE EFFECTIVENESS

In addition to the Council's Greenfield Site Assessment criteria, it is considered important to demonstrate that the subject site at Cockburn Crescent is effective. Planning Advice Note 2/2010 'Affordable Housing and Housing Land Audits' provide the standard criteria for a site to be promoted as being 'effective'. The proposed site is considered against each criterion as follows:

- Ownership -The site is being promoted by the landowner, who is a willing seller. Given
 the location of the promoted site within Balerno, a sought-after location within
 Edinburgh, it is considered the site would be attractive to a large number of national
 housebuilders.
- **Physical** The supporting reports provided in Appendix 1 to 5 of the Representation demonstrates that the site is free from constraints that would impede development.
- Contamination A desk top assessment (DTA) has confirmed that there are no known contamination issues that would prevent development of the site. The DTA can be provided upon request.
- **Deficit Funding** No public funding is required or sought to enable the residential development of the promoted site to be economically viable.
- Marketability As stated above, given the location of the promoted site within Balerno, a sought-after location within Edinburgh, it is considered the site would be attractive to a large number of national housebuilders.
- Infrastructure The proposed site is free of infrastructure constraints.

- Land Use The proposed site is being promoted for residential development and there is a confirmed market demand for new housing opportunities in Balerno. The site is located on the edge of the existing settlement and would be a logical and natural extension to the urban area. As such, housing is the preferred use of the site.
- **Programme and Delivery** The site would likely to be developed by a national housebuilder and an affordable housing delivery partner. It is envisaged that the completion of the site could be undertaken within a 4-5 year period from the granting of Planning Permission (including AMC Approval).

Choices 13 - BDW have no comment.

Delivering West Edinburgh

The City Plan acknowledges the significance of West Edinburgh in terms of transport and economic development and that a Study has been commissioned to assess the full potential of the area.

Choices 14A - BDW consider that the timing of the West Edinburgh Strategy to be questionable given the current stage of the development plan review cycle. This study would be expected to inform the proposed changes to the development plan and not post-date this principle stage of public consultation in the review of the development plan. Moreover, in the interests of transparency, clarity is sought in terms of the brief for this Report and, particularly, the opportunity for BDW, to contribute to the informed outcome of this study.

Choices 14B & C - BDW have no comment.

Choices 15 - 16 - BDW have no comment.

SECTION 5 - CONCLUSION

This representation has concluded that there is a significant shortfall in the housing land requirement and that approximately a further 52,837 homes will be required on greenfield land. As a result, the proposed City Plan 2030 will have to release additional greenfield housing sites.

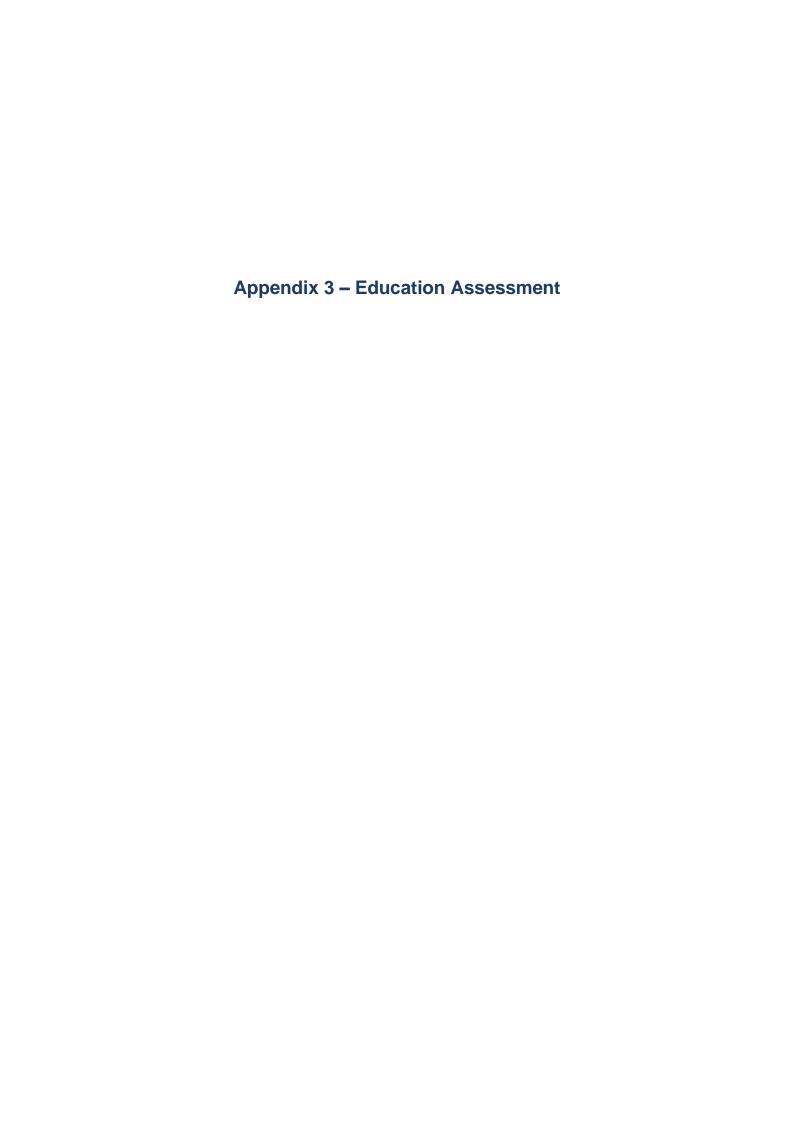
BDW contend that none of the Options set out in the proposed changes to the Development Plan are sufficient to meet the shortfall in housing. BDW support, per Option 3, the blended approach of brownfield and greenfield delivery, however, further greenfield sites will be required than envisaged in this Option. In this respect, to positively contribute to the City's housing need, BDW promote the site at Cockburn Crescent constituting a logical greenfield release opportunity. It is a natural extension to the existing settlement of Balerno mirroring the existing pattern of housing development to the north of Cockburn Crescent. The site can deliver c.200 units including 25% affordable housing (50 homes). The site is effective and can deliver much required houses in the earlier part of the City Local Development Plan 2030. The residential development of the site would support the promotion of active travel and use by public transport. The supporting Landscape and Visual Impact Assessment has confirmed that the proposed development would not detract from the quality of the landscape setting of Balerno or the surrounding identified Special Landscape Area. Furthermore, the LVIA confirms that, in terms of planning policy, and the existing Green Belt designation the development of the site would not result in coalescence.

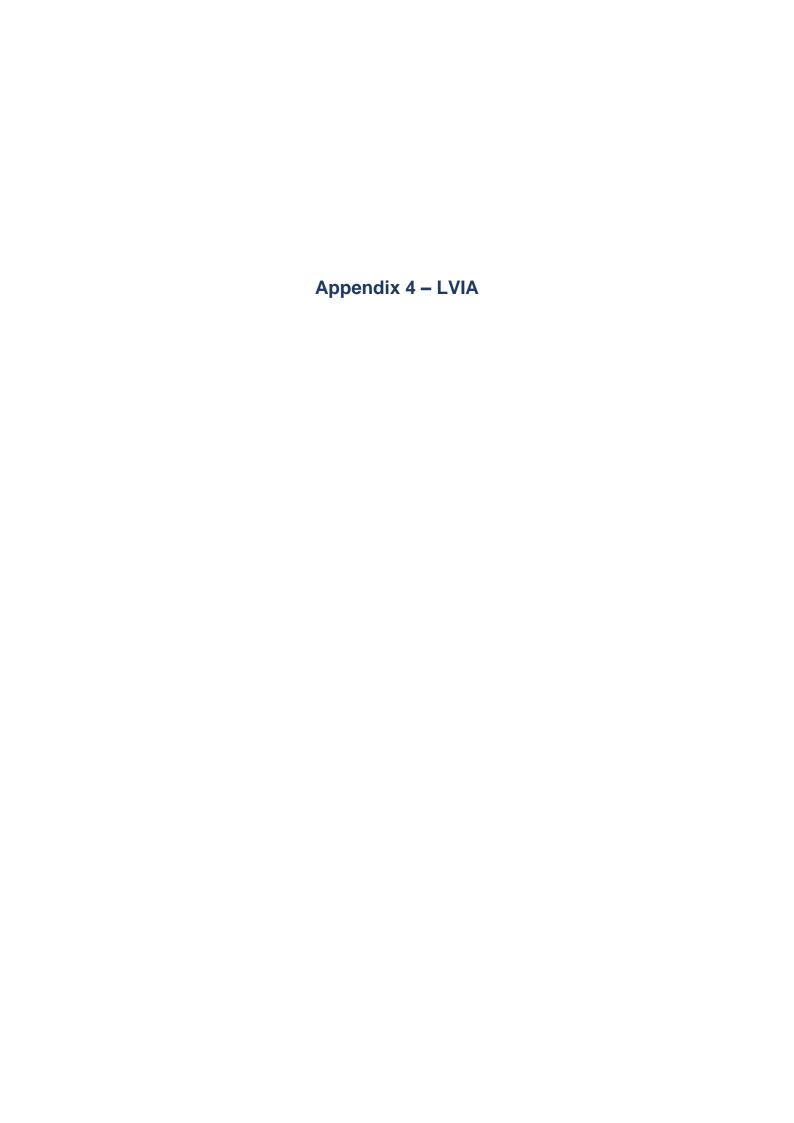
It is therefore recommended that the City of Edinburgh Council promote additional greenfield release and remove the site at Cockburn Crescent from the Green Belt and the relevant Special Landscape Area and allocates the land for future housing.

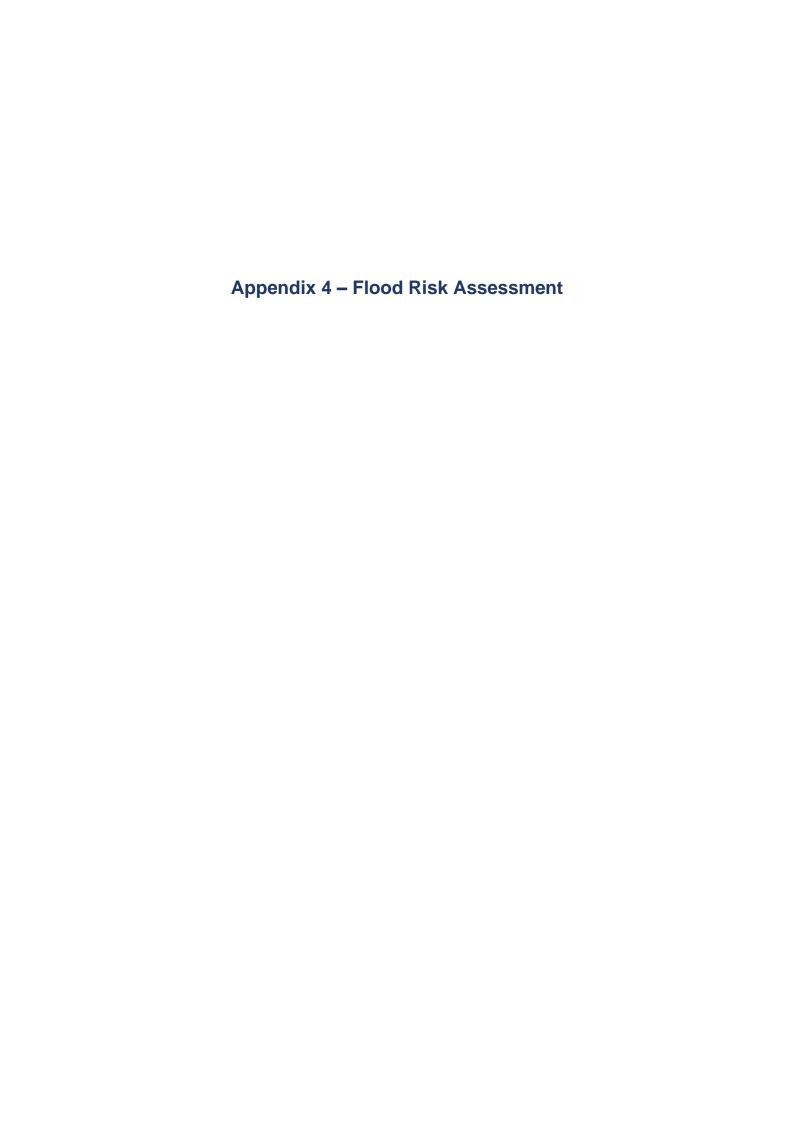


Appendix 1 - Design Statement

Appendix 2 – Transport Assessment









COCKBURN CRESCENT, BALERNO

DESIGN AND ACCESS STATEMENT

BARRATT AND DAVID WILSON HOMES

NOVEMBER 2015



optimised environments





INTRODUCTION

THE DESIGN TEAM

CONTEXTUAL ANALYSIS

THE SITE TOPOGRAPHY NEIGHBOURHOOD CONTEXT **IMMEDIATE CONTEXT** HISTORY **CHARACTER AND IDENTITY CONSTRAINTS & OPPORTUNITIES MOVEMENT & CONNECTIONS PUBLIC TRANSPORT NETWORK** ACCESS TO LOCAL AMENITIES

DESIGN PRINCIPLES

NATIONAL DESIGN GUIDANCE LOCAL PLANNING POLICY **COMMUNITY ENGAGEMENT**

LANDSCAPE STRATEGY

INTRODUCTION & PURPOSE

- 4.1.1 PURPOSE OF THIS DOCUMENT
- 4.1.2 LANDSCAPE LED DESIGN APPROACH
 4.1.3 DOCUMENT STRUCTURE

2 LVIA SUMMARY

LANDSCAPE EVALUATION

- 4.3.1 THE SITE (OVERVIEW)
 4.3.2 CONTEXT
- 4.3.3 RELATIONSHIP WITH BALERNO
 4.3.4 LANDSCAPE CHARACTER

- 4.3.6 THE CSTA

 4.3.7 SITE APPRAISAL

 4.3.8 SITE BOUNDARIES

 4.3.9 SUMMARY OF LANDSCAPE ANALYSIS

LANDSCAPE APPROACH

- LANDSCAPE CONCEPT

LANDSCAPE FRAMEWORK

- 4.6.1 LANDSCAPE FRAMEWORK

LANDSCAPE DESIGN PRINCIPLES

- 4.7.1 DESIGN PRINCIPLES
 4.7.2 ILLUSTRATIVE PLAN

- 4.7.7 MANSEFIELD ROAD CHARACTER
- 4.7.8 GREEN LINKS 4.7.9 LOCAL PARK AREA

MASTERPLAN

CONCLUSION

1.0: INTRODUCTION



1.0: INTRODUCTION

This Design & Access Statement is a supporting document to the application for Planning Permission in Principle (PPP) for a residential development, comprising of approximately 150 dwellings at Cockburn Crescent, Balerno.

This document evaluates the site within its wider context and identifies the key features and assets. The vision and evolution of the proposed new neighbourhood is then described within the Landscape Strategy section.

A Separate 'Landscape and Visual Assessment' has been carried out and has informed the development of the proposals. This document is also submitted in support of the application.

The design statement also considers the proposed development in the context of national planning policy and Planning Advice Notes such as PAN68: Design Statements and PAN78: Inclusive Design.

2.0: CONTEXTUAL ANALYSIS









2.1: THE SITE

Balerno is a suburb of Edinburgh situated 8 miles southwest of the city centre, next to Juniper Green and Currie. The site is located directly to the south of the existing housing on Cockburn Crescent and is currently used as arable farmland.

Mansfield Road runs along the north-eastern boundary of the site and connects to the centre of the town. Existing farmland lies to the south-east and south-west and the site is contained on these sides by existing woodland.

- 1. COCKBURN CRESCENT TO NORTH-WEST
- 2. SITE FROM NORTH-EAST
- 3. MANSFIELD ROAD TO NORTH-EAST

2.4: IMMEDIATE CONTEXT

The site lies on the south-eastern edge of the settlement of Balerno with Cockburn Crescent to the north-west and Mansfield Road to the north-east. There are a number of existing neighbourhoods to the north-west opposite Cockburn Crescent which consist of both local authority housing and more recent developments. Beyond this to the north is Malleny Park and Dean Park Primary School. To the east of the site lies the Harmeny Education Trust, which consists of a school and an outdoor activity centre.



Highlea Circle



Housing on Mansfield Road



Housing on Cockburn Crescent



Existing house to south-east of site

2.5: HISTORY

The town of Balerno dates back to the 13th century, however, the 18th Century brought substantial development to the area, with many new flax, snuff and paper mills appearing around the Water of Leith. These mills were a prominent feature of village life until fairly recently.

After the First World War, house building began in the area and since then the demand for housing has surpassed commercial and industrial needs. There was a short loop railway running over what is now the Water of Leith Walkway.

There are many historical buildings in Balerno including Malleny House & Gardens, which dates to the 17th century, and Harmeny House as well as several other listed buildings in the town centre.



HISTORIC MAP OF BALERNO



The area has a strong character and identity borne out of its surrounding landscape and history.

The housing which fronts onto Cockburn Crescent to the north-west is a mix of detached single and two-storey brick and render dwellings with small gardens and drive ways. The neighbourhoods further to the north feature mostly two-storey detached and semi-detached houses with larger gardens fronting onto tree-lined streets and lanes.

The rural character of the landscape surrounding the site is characterised by rolling fields and areas of mature woodland which define the boundary of the site to the south-east and south-west.







- 1. HARMENY HOUSE
- 2. VIEW OF SITE FROM NORTH-EAST
- 3. HOUSING AT THREIPMUIR AVENUE
- 4. HOUSING AT CANDLEMAKER'S PARK.
- 5. HARMENY WOODLAND WALK
- 6. VIEW SOUTH ACROSS EXISTING SITE

2.9: CONSTRAINTS & OPPORTUNITIES

SITE BOUNDARY

EXISTING ROAD NETWORK

POTENTIAL FOOTPATH / CYCLEWAY

EXISTING SETTLEMENTS/HOUSING

EXISTING HOUSE

EXISTING WOODLAND

SLOPE

OVERHEAD POWER LINES



2.9: CONSTRAINTS + OPPORTUNITIES

The site is subject to a number of constraints which will inform the design of the new neighbourhood.

The topography generally falls to the north-east and rises again to a slight knoll in the north-east corner. There is existing planting along the north-eastern boundary and the south-eastern and south-western boundaries are contained by existing woodland.

An existing line of woodland, which currently defines the boundary between two adjacent fields, divides the site into two equal halves and continues along the same line within the existing settlement to the north.

Cockburn Crescent and Mansfield Road, to the north-east and north-west are the only roads which contain the site. There is also an existing property on the south-east corner of the site which is screened by woodland. Overhead power lines are visible to the south of the site however they do not cause any significant issues in terms of access and views.







2.10: MOVEMENT + CONNECTIONS

The site is well served by an existing road network to the north-east and north-west of the site.

Existing access to the site is from Cockburn Crescent and Mansfield Road. Proposed roads through the new neighbourhood should reflect the character and rural nature of the site and respect the existing green links and sight lines which run north to south through the housing developments to the north-west.

The site offers the potential to greatly improve pedestrian links and movement and extend existing green links and areas of green space, by allowing landscaping to dictate the movement in and around the site.









2.11: PUBLIC TRANSPORT NETWORK

The site is currently served by existing bus services operated by Lothian Buses, E & M Horsburgh and Waverly Travel of Broxburn.

There are a number of services in the surrounding area with the closest bus stops located on Cockburn Crescent which provide services to the nearby surrounding area, the City Centre and East Lothian.













2.12: ACCESS TO LOCAL AMENITIES

The site is well placed to take advantage of surrounding local amenities. There are a number of shops, family pubs / restaurants and cafés located in the centre of town which is 1km from the site and within easy walking distance.

There are three schools in Balerno, including Dean Park Primary School, Harmeny School and Balerno High School, all of which contain sports and outdoor facilities.

A tennis and bowling club is also located nearby in the town centre as well as a Scotmid, pharmacy and post office.

- 1. MALLENY PARK
- 2. DEAN PARK PRIMARY SCHOOL
- 3. OPEN SPACE
- 4. HARMENY SCHOOL
- 5. THE BALERNO FRY TAKEAWAY
- 6. PHARMACY
- 7. POST OFFICE
- 8. SCOTMID
- 9. TENNIS & BOWLING CLUB
- 10. BALERNO HIGH SCHOOL

3.0: DESIGN PRINCIPLES



3.1: NATIONAL DESIGN GUIDANCE

The Policy Statement for Scotland Designing Places identifies the components of the 'Design Tool Kit' and the sequence in which they are to be applied. Development Frameworks help to deliver planning policy requirements by setting out the main planning and design principles to which subsequent masterplans will conform.

Scottish Planning Policy and advice require that land and resources are used efficiently. Key policy objectives include planning for integrated transport with an appropriate mix of land uses and offering a full range and choice of housing types, forms, sizes and tenures. The Scottish Government places great emphasis on improving the design of all new development to reflect the character of the area within which it is to be located, as well as creating mixed communities that are safer, more inclusive and provide new residential streets that are both attractive and safe for all to use. Additionally, developments of this scale must provide a range of house types, sizes and tenures including affordable housing, as well as the necessary enabling and supporting facilities and infrastructure. This includes mitigation of any impacts on education facilities, the provision of open space, play areas, a sports pitch and related changing accommodation as well as opportunities for local retail, employment and community use.

New residential developments should produce mixed communities where opportunities to live, work and recreation are located side by side. This is to be achieved at higher densities by designs that respond to the context and qualities of a site and its surroundings. From this, positive relationships between buildings are to be created to produce a sense of place, identity and welcome, and to clearly define public from private space. Designs are to provide a hierarchy of attractive streets and spaces that are defined by buildings that reflect local architectural styles. The result is to be distinctive new places in which it is easy for people to find their way around. Such places must also be designed to a human scale, be resource efficient and adaptable. Central to this is a network of well-connected, attractive and enclosed public spaces that are safe, pleasant, and easy to move around, especially on foot and cycle.

4.0: LANDSCAPE STRATEGY

4.1 INTRODUCTION & PURPOSE

4.1.1 Purpose of this document

This Landscape Strategy has been prepared by Optimised Environments Limited, 'OPEN' on behalf of Barratt David Wilson Homes. The document forms a supporting document to accompany the Planning Application in Principle and promotes the allocation of land at Cockburn Crescent, Balerno for the purpose of a sustainable residential development within the city.

This document sets out the proposed Landscape Strategy explaining how the proposals meet the Council's expectations for landscape proposals as part of new development.

The Site

The site comprises two rectangular fields extending to 31 acres (12.5) hectares) on the southern edge of Balerno, eight miles southwest of Edinburgh City Centre. The site area is highlighted on the plan

Cockburn Crescent, bounds the north-west of the site. The south western and south eastern boundaries are formed by mature tree belts. The eastern boundary is formed by Mansfield Road, a minor road leading south to Pentlands Regional Country Park, also with mature woodland to the east of the road.

The land falls generally from south to north with slight undulations on the western field and a dip on the eastern field. A further tree belt bisects the site, forming the boundary between the two fields. A pylon line is located to the south of the site and tree belt.

The land forms part of Upper Dean Park Farm, which is situated to the south and is utilised for crops but is class 4.2 agricultural quality (non prime)

4.1.2 Landscape led design approach

This landscape strategy has been prepared to explain how the landscape setting and character of the land to the south of Balerno has informed the scale, location and form of development to be located within the site area.

The document describes how the Landscape and Visual Appraisal (LVA) along with analysis of the site has informed the approach to development at Cockburn Crescent. The landscape strategy has been prepared to describe and illustrate how the proposed development form at Cockburn Crescent is a product of understanding the landscape pattern and character.

This document describes the proposed site location and its surrounding context, and includes a summary of the LVA providing a detailed examination of the landscape setting. Through this appraisal, the study has identified the capacity of the site to accommodate change and concludes with a landscape approach, concept and landscape framework which establish the structure for development at Cockburn Crescent.

The document demonstrates that the overall character and quality of the wider landscape will not be unacceptably compromised through careful development of the site area and indeed an opportunity exists to enhance aspects of the site including establishing robust landscape boundaries and the contribution that it can make towards improved accessibility to open space. Following a landscape led design approach, which considers the study area in a comprehensive rather than a piecemeal and incremental basis, this approach emphasises landscape capacity, site appraisal, design quality, innovation and sustainability as the key factors which can achieve this objective.

4.1.3 Document structure

The document is presented in a number of sections to clearly establish how the analysis of the landscape setting and character has informed the landscape strategy which in turn has established the opportunity for development at Cockburn Crescent. The document is structured as follows;

Introduction and Purpose

This section provides a summary of the LVA. It provides a visual analysis of the potential impacts on the surrounding area to inform the visual capacity of the site to accommodate development.

Landscape evaluation

The aim of this section is to identify the sensitivities and opportunities that exist within the site area and its immediate context and identify a physical capacity and a preferred approach to development within the site area. Within this section the analysis focuses on landscape elements.

Landscape approach

This section describes the approach to the landscape context, how development at Cockburn Crescent can be developed in such a way as to be sensitive to the issues raised through the analysis.

Landscape concept

This section presents the development concept that has evolved from the analysis and appreciation of the site and its strategic and local context.

Landscape Framework

This section describes the Landscape Framework which establishes a clear landscape structure for development, whilst allowing more detailed proposals to come forward in due course.

Furthermore it explains how the Landscape Strategy has been developed to meet the Council's expectations for landscape proposals as part of new development. Describing how the proposals meet the Councils requirements for open space, access, etc. Landscape design principles

This section builds upon the Landscape Framework describing the intended character, function and key design principles for the key landscape features as set out in the Landscape Framework.



4.2 LANDSCAPE APPRAISAL

4.2.1 Landscape appraisal

A landscape and Visual Appraisal (LVA) has been prepared to support the Planning Application. This section of the document summarises the key findings of the LVA which have informed the Landscape Strategy.

The landscape and visual appraisal undertakes an evaluation of the landscape and visual effects of the residential development of the Cockburn Crescent site.

4.2.2 Summary of Landscape Effects

The effect of the proposed development on three Landscape Character Types (LCT) and two designated areas has been appraised and shows that the level of effect will be mostly minor or there will be no effect. This finding relates chiefly to the relatively small area which the proposed development occupies, its containment by existing built form and tree cover and the design of the layout to ensure residual effects are to some degree mitigated by the use of two storey dwellings and the substantial provision of mitigation planting.

The proposed development will give to a major level of effect in parts of the Cockburn Geometric Wooded Farmland LCT, Pentlands cSLA and Edinburgh Green Belt. This occurs across the site area and the immediate margins around it and relates to the change that the introduction of the new residential development will bring to the landscape character of these immediate and close range parts.

4.2.3 Summary of Visual Effects

The selection of potential viewpoints has been restricted by the limited extent to which the proposed development will be visible. Mature woodland occurs to the west and east of the site and residential development is situated to the north. While there is some partial screening to the south, the fragmented condition of the tree belt means that visibility does extend into middle range views in the Pentland Hills. The generally enclosed nature of the site limits the possibility of viewpoints to within the margins of the site to the north, west and east, and to the middle range to the south.

Receptors along Cockburn Crescent, adjacent to the northern site boundary, will experience a major level of effect, as would be expected, owing to the close proximity of the proposed development. The magnitude of change in these areas, is moderated by the provision of mitigation measures embedded in the masterplan, whereby the residential dwellings are recessed from the northern site boundary and a landscape setting is created in the foreground, along with substantial woodland planting in the background.

On Mansfield Road, there is not the same presence of residential receptors and therefore it will be pedestrians who will experience the most notable effects, while the views of road-users will be partially screened by the existing embankment. The recessed position of the proposed development and the depth of proposed woodland planting will reduce visual effects as the planting matures.

In the Pentland Hills, while views of the proposed development will be visible through the fragmented shelter-belt, the distance from which these views occur means that the proposed development will not appear as a prominent feature, especially as it is seen as an extension to an existing settlement. Again, the substantial mitigation planting along the southern edge of the site will mitigate these visual effects over time until eventually the proposed development will be screened and a more robust and defensible boundary will be created.



4.3 LANDSCAPE EVALUATION

4.3.1 The site (overview)

The site is located on the southern edge of the settlement of Balerno, to the south-west of the City of Edinburgh. The site comprises two fields, which are currently used for arable farming which are enclosed on all four sides by a combination of hedgerows and tree belts. A row of mature trees also separates the fields internally. The landform of the site is gently undulating, falling away from a height of approximately 222m AOD in the south-west corner to 207m AOD in the north-east corner. This follows the trend of the wider landform which generally falls from the Pentland Hills in the south towards the Water of Leith in the north.

To the west and south of the site, lies the wider farmed landscape, typically comprising small and medium sized fields of crops or improved pasture set within a strong framework of tree lined enclosures. To the north lies the existing settlement boundary of Balerno with the properties on Cockburn Crescent fronting the street (and site) to create a positive frontage. The houses are modern and mostly two-storey and detached with front gardens, garages and driveways. To the east lies a wooded area with a long driveway leading to Harmeny School, a school for children with special needs, run by a charitable trust.

The site is well enclosed within its local context with visibility only arising within the immediate vicinity. The site marks the southern edge of the settlement, the arable farmland presenting a rural character distinct to the urban character of the adjacent residential area.

4.3.2 Context

While the earliest written records of Balerno date back to the late 13th Century, it was not until the 18th Century that the settlement started to expand, as flax, snuff and paper mills were developed along the Water of Leith and Bavelaw Burn. These mills remained a feature of the town up until the end of the 20th Century. After WW1 residential development occurred which expanded the town to the south. This expansion continued through the latter part of the 20th Century to form the southern settlement boundary at Cockburn Crescent.

Balerno is located to the south-west of Edinburgh, beyond the residential areas of Juniper Green and Currie which extend along the A70. While Ravelrig continues the linear development along the A70, the main part of Balerno is set to the south of the main road and has evolved as more of a square, rather than linear, settlement.

Balerno lies on the southern slopes of the valley of the Water of Leith. The surrounding landscape is agricultural with a predominance of arable crops and improved pasture. A well-defined geometric pattern of mature tree-belts enclose the fields and give the landscape a sense of enclosure. Farmsteads occur intermittently across this landscape, typically comprising clusters of farm buildings and large sheds. Development is also evident in the form of an electricity transmission line, routed across the lower slopes, parallel to the north-east to southwest alignment of the Pentland Hills.

4.3.3 Relationship with Balerno

The site is located directly south of Cockburn Crescent and approximately 950m south of Balerno village centre. Access is primarily via the field gates in the middle of Cockburn Crescent.

Balerno's southern urban boundary is characterised by a one-sided street, with avenue tree planting down a section of the north-side of the road. The southern side of the street is aligned by a mixed species hedge which defines the northern boundary of the site. Spatially, the street has an exposed, open character, with views south out towards Black Hill in the Pentland Hills Regional Park. As a result of the rising topography and woodland belt to the south of the site the views are broken.

Connection to Balerno

There are three vehicular T-junctions along the section of Cockburn Crescent which adjoins the study area, namely Whitelea Road, Greenfield Crescent and Threipmuir Avenue. All three roads afford pedestrian access northwards via public footpaths to public open green space and the village centre. There is a foot-way along the northern side of Cockburn Crescent. Core Path 19 follows Mansfield Road (both on road and foot-way adjacent to the site) to the east of the site area, connecting the Pentland Hills Country Park to Balerno. A strong tree-lined field boundary links Cockburn Crescent to the Open Green Space to the north, this connection does not include a formal path. Within the site area this tree lined field boundary includes an informal path link to the southern boundary of the site.

Cockburn Crescent provides a bus route with a bus turning area located at the eastern end on the north eastern boundary of the site.

Existing open space

There is a significant area of public open space (recognised in the CEC Open Space Strategy, 2010) to the north of the site area. The open space is located at the centre of the residential area (although it is generally not overlooked) and follows the pattern of the historic field boundaries, incorporating many of the existing trees and stone walls. The area of open space is well provided for incorporating a wide variety of spaces, specifically Malleny Park, a well equipped play area, Dean Park Primary School and sports pitches associated with the school.

The public open greenspace is accessed from several points around the general cruciform shape, including, Whitelea Road, Greenfield Crescent and Threipmuir Avenue all connecting back to Cockburn Crescent. The distinctive central woodland spine is underutilised and under-developed, currently with no pathway linking the south of Balerno (Cockburn Crescent) to the north via this alignment.

In addition to the central woodland spine, the other tree-lined field boundaries create vistas and footpath linkages around the Open Green Space and serve to connect successive phases of urban expansion.

Local Nature Conservation Site

To the east of the site the existing woodland forms part of a wider Local Nature Conservation Site. Harmeny Community Woodland is publicly accessible and forms a strong boundary to the east of the site.



4.3.4 Landscape character

The Land Use Consultants report 'Edinburgh Green Belt: Landscape Character Assessment' (2010) classifies Balerno under Landscape Character Area 36'Cockburn Geometric Wooded Farmland.'The area is described as "gently sloping arable and pasture farmland with strong shelter belt patterns overlaying the landform which creates enclosure and restricts views."

Legend

Red Line Boundary

5km Study Area

Local Authority Boundary

Edinburgh Landscape Character

1. Incised River Valley

a. Water of Leith Colinon to Balerno b. Water of Leith Slateford to Colinton Dell

2. Pentland Flanks

a. Cockburn Geometric Wooded Farmland b. Curie Sloping Wooded Farmland

c. Leith Plateau Farmland d. North Pentland Slopes

e. Redford Basin

f. West Pentland Fringe

3. Pentland Hills - Upper Slopes and Summits

a. Pentland Heights

b. Bavelaw Geometric Wooded Farmland

4. Policy Landscape

a. Dalmahoy Policies 5. Rolling Farmland

a. Baberton Farmland

b. Gowanhill Farmland

c. Ratho Farmland 6. Rural Outcrop Hills

a. Kaimes Hill

b. RathoHill

7. Settled Farmland

a. Riccarton Institutional Landscape b. Gogar Farmland and Institutions

c. East Hermiston Farmland

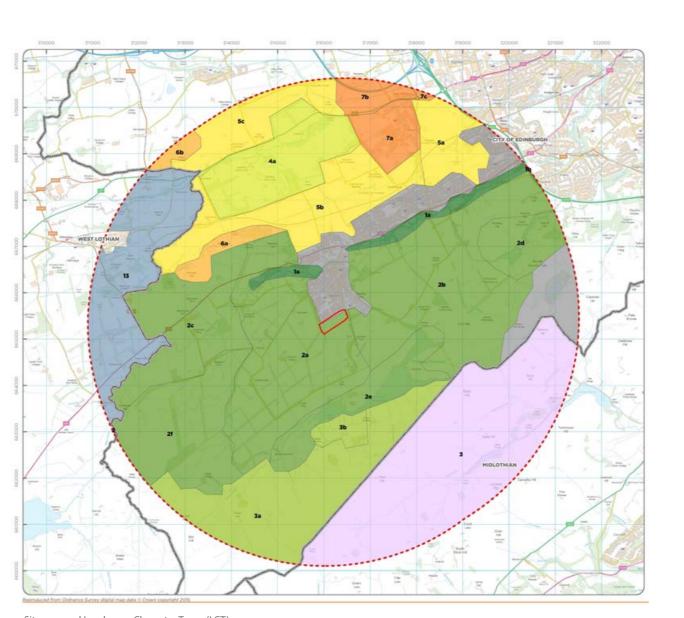
Urban

West Lothian Landscape Character

13. Lowland Plains: Kirknewton Plain

Midlothian Landscape Character

3. Uplands: Pentland Hills



Site area and Landscape Character Types (LCT).

4.3.5 Landscape pattern

It is clear from the historic plan below and the plan opposite how the geometric pattern of field boundaries (a characteristic of the LCT) has provided the framework for the historic growth of Balerno. The historic geometric field patterns in evidence in the 2nd Ordnance Survey are still in evidence today, with the old pattern still visible albeit within the framework of urban expansion.

The landscape pattern extends south providing a framework for further growth consistent with what has gone before. South of the southern boundary of the site the landscape character changes due to the topography and the loss of the strong sense of containment offered by the mature Harmeny Community Woodland. The change in landscape character from that to the north which is well enclosed and relates strong to the urban area, to the rural landscape to the south suggest that the capacity to accommodate development is restricted to the site area. Following the established landscape pattern the extent of any proposed development should be in proportion to the existing settlement, offering an urban extension southwards without extending to the east or west beyond the existing alignment.

New landscape planting should be provided to strengthen the southern boundary of the town connecting the strong woodland belt to the west and Harmeny Community Woodland to the east. An enhanced southern boundary would both, improve the containment of the site and soften the character of the edge when viewed from the Pentlands.



Historic plan of Balerno (OS 1894), highlighting distinctive field boundary pattern.



Balerno urban area and surrounding woodland pattern.



Aerial photo highlighting the contrasting landscape character areas.

Landscape character experienced from Mansfield Road

The setting of the site and experience of the how the site sits within the wider landscape can be described through the experience of travelling north to south along Mansfield Road. Mansfield Road forms the eastern boundary of the site and as a key route to the Pentland Hills Regional Park also includes the alignment of Core path 19. It is clear as you travel north to south along this alignment the landscape character transitions from Urban to Rural (Pentland Flanks).

- 1. North of Cockburn Crescent the character is distinctly urban with housing overlooking the street to the west, with woodland to the east and footpaths on either side.
- 2. Cockburn Crescent junction with Mansfield Road. The view looks southwest across the site, such that it features the farm fields and the hedgerows and trees which define their boundary. The extent of the view is largely contained by the enclosure of the boundary trees to the south and west, except where filtered views through the tree cover expose glimpses of the wider landscape. To the east (left of the view), the mature and dense woodland of Harmeny House screens views in this direction.
- 3. Looking north from Mansfield Road. To the north the urban edge of Balerno is visible in the form of the semi-detached, two-storey dwellings which front out onto Cockburn Crescent and overlook the site. This urban edge forms enclosure to the view in this direction. The view is characterised by the interface between the urban and rural boundaries, both of which have an influence on the character of the view. While the fields present an attractive rural character, the containment of the view to within the local area means that the association of the site with the wider landscape is not evident.
- 4. Further north on Mansfield Road, the open view to the south and west does not extend far. This is partly due to the landform, which falls away to the south, such that the view is largely contained by the immediate ridge line. It is also partly due to the extent of mature tree cover along the field boundaries, which although fragmented in sections, largely forms enclosure to the adjacent field.
- 5. North of the southern boundary the character of the landscape is distinctly rural. Views back to the urban edge of Balerno are not possible as a result of the containment offered by the landform and woodland.



Existing landscape pattern

The analysis describes how the topography and woodland combine to define and contain the site area.

The site provides a transition space between the existing urban area and rural area to the south. The southern edge of Balerno is defined by the hard urban edge of Cockburn Crescent which overlooks the

The woodland along the southern boundary forms a clear transition between urban edge character and the rural character of the Pentland Flanks.

The analysis suggests how the corner junction between Mansfield Road and Cockburn Crescent will be especially prominent in the approach for south bound road users and pedestrians on Mansfield Road and will need to be deigned with careful consideration.

From the eastern side of the site views to the Pentland Hills are limited as a result of the topography and woodland.

The site area provides the opportunity for the town to expand in a manner consistent with the historic pattern and provide a more robust long term boundary to the south. The following sections of this document will show how this transition space can be appropriately designed to allow the town to expand in a sensitive manner to the south whilst providing a more robust boundary to the south.











4.3.6 The cSLA

The landscape led approach to development at Cockburn Crescent allows the opportunity to review the proposed boundary of the cSLA. The proposed development site south of Cockburn Crescent is located on the northern edge of the candidate Special Landscape Area 9 (cSLA). At present the boundary appears arbitrary, with the alignment seemingly based on the transition from open countryside to the urban realm, rather than on key landscape features such as topography or vegetation cover.

Boundaries should be chosen to be robust and clearly identifiable on the ground, and where possible associated with a prominent physical landscape feature, such as road or railway, watercourse, field boundary, changes in landform and vegetation cover or combination of these features.

Using the above criteria for guidance, it is considered that the southern boundary of the development site is to be the most suitable alignment for the northern section of the cSLA due to the specific topographical characteristics of the site.

The site area provides the Local Planning Authority with an opportunity to create a more suitable and sustainable edge definition to the city's south-western periphery. This revised boundary will (1) improve the setting for the cSLA with the creation of a woodland belt; (2) harmonise and integrate the cSLA with the urban character of Balerno village by softening the existing hard urban edge and (3) create a robust maintenance and management regime which will secure the long-term objectives of maintaining the cSLA.

The proposals for the site area reinforce this proposal and follow the principle that the southern boundary of the site would form the new boundary of the cSLA to the south of Balerno.

Legend

Red Line Boundary
5km Study Area

Local Authority Boundary

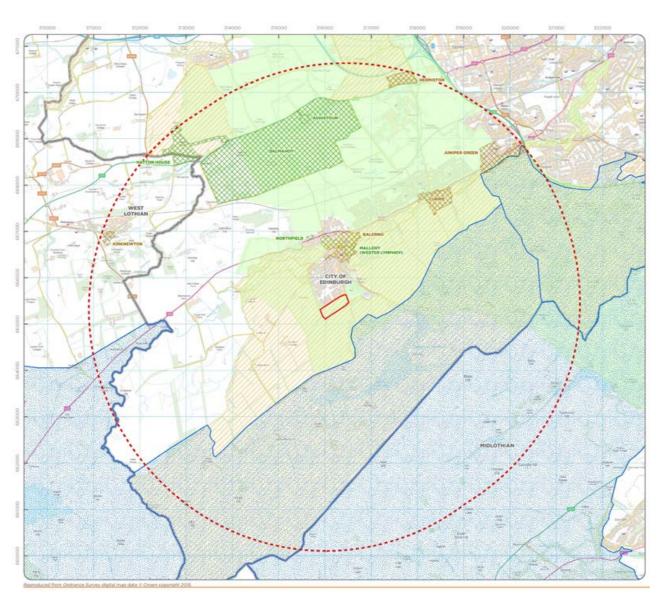
Conservation Area

Garden & Designed Landscape

Area of Great Landscape Value

(Candidate) Special Landscape Area

Greenbelt



Candidate special landscape area

4.3.7 Site Appraisal

The following section contains a brief note on some of the key aspects of the site area which will inform the landscape strategy.

Topography

The site is gently undulating, falling from south to north with localised undulations on the western field and a more pronounced dip on the eastern field. The topography of the site relates to the general fall in levels from the Pentland Hills in the south to the Water of Leith in the north; the south-west corner of the site is the highest point (220m contour) with a raised area at 215m and land falling in a north-east direction with contours at 210m, 205m and finally 200m in the far north-east corner.

The north facing site does not offer the best aspect but does provide good views north relating back to Balerno.

There are no significant constraints on development within the site area as a result of the topography.

Trees (Arboricultural summary)

A Tree Survey has been completed to support the Planning Application and has informed the proposals contained in this document.

A line of mature trees bisect the site into two fields with further mature trees lining the southern boundary. To the west, a tree belt of c.30m width forms part of the wider shelter belt structure while a woodland belt of c.40m width adjoins Mansfield Road on the eastern boundary, forming the woodland setting around Harmeny School and Malleny Millgate.

Existing tree cover comprises poor or very poor sections of old field boundary beech trees. Most are over-mature and exhibit various degrees of decay and dieback associated with long-term root disturbance from adjacent agricultural activities. Trees along the SE boundary grow on a low drystane dyke, and rooting has been restricted to the north (into the site) due to the presence of the wall and ground level change. The row of trees running north south through the centre of the site is also growing in a restricted rooting environment, and the trees are generally smaller in stature than those in the surrounding areas.

In their present condition, few of the existing trees are likely to survive more than 20 years. The trees within the site are not believed to be subject to any statutory protection. No work should be undertaken without confirming the position with the local planning authority.

Watercourses

There are no watercourses on site but John's Burn runs along the western boundary with the larger Bavelaw Burn around 300m east of the site. The depression on the north-eastern part of the site is marshy with localised surface water retention understood to occur.

Microclimate

The prevailing wind from the south-west/west is generally buffered by the woodland belt to the west/south-west of the site. Further protection is afforded by the southern tree line. Proximity of trees provides varying degrees of shade from the sun path with the natural positioning of usable outside space being to south/south-west.

View

Long-range views of the Pentland Hills to the south are possible from the western end of Cockburn Crescent above the southern tree belt. Further east the view south to the Pentland Hills are limited due to the topography and woodland.

While there is some partial screening to the south, the fragmented condition of the tree belt means that visibility does extend into middle range views in the Pentland Hills. The generally enclosed nature of the site limits the possibility of viewpoints to within the margins of the site to the north, west and east, and to the middle range to the south.

Path connections

Core Path 19 adjoins the eastern site boundary (Mansfield Road) and connects Balerno with Pentland Hills Regional Park 2.5km to the south and the Water of Leith path network.

There is a footway to the northern side of Cockburn Crescent, there is no formal footway to the south of the road and no formal connections to the site area. Following the historic field boundaries there are however a couple of informal path links through the site connecting Cockburn Crescent to the woodland to the south.





4.3.8 Site boundaries

The landscape pattern and location of the site area means that the site boundaries have been a key factor in shaping the site form and informing the landscape strategy. Below is a brief description of each of the site boundaries and a description of how the landscape strategy might address that particular edge to allow the expansion of Balerno south whilst remaining sensitive to the landscape pattern and wider landscape setting.

Southern boundary

The southern boundary is defined by the existing mature woodland belt, comprising predominantly field boundary Beech trees. The woodland is generally fragmented and in poor condition. To the south west there are large gaps between trees with views south possible. To the south east the woodland belt is stronger and better defined. The woodland belt is a historic feature which forms part of the wider geometric landscape network.

Eastern boundary (Mansfield Road)

The eastern boundary of the site is defined by Mansfield Road. The field boundary to Mansfield Road is not defined. To the east of the road, there is a foot-way and the dense mature woodland of Harmeny Community Woodland (LNC Site).

Northern boundary (Cockburn Crescent)

The northern site boundary is defined by a hedge set within a grass verge onto Cockburn Crescent. The condition of the hedge varies along its length with some large gaps. The built form on Cockburn Crescent comprises bungalows, 2 storey semi-detached and linkeddetached with large set-back to street (3m landscape strip, 2m footpath, 6m front garden/plot parking) with tree planting.

To the west the street has an exposed, open character, with views out towards Black Hill in the Pentlands Regional Park. To the east the topography and woodland combine to enclose the site more with views out limited.

Three cul-de-sacs are accessed from the main street with the bus terminus at the corner of Mansfield Road. The cul-de-sacs all provide path connection to the Marchbank Park to the north.

Western boundary

The western boundary is well defined by a strong woodland belt surrounding the Johns Burn which sits in a small gully. This woodland belt forms part of the historic field boundary which continues north to define the edge of Balerno.











4.3.9 Summary of landscape analysis

It is recognised that the site is located in a sensitive and attractive location surrounded by protected areas of open space to the east and south. It is however the character and pattern of existing residential development to the north that defines the opportunity to create an attractive development that is fully context driven. The fact the site is very well defined by surrounding woodland to the sensitive rural landscapes to the south and in close proximity to these protected areas should not preclude development rather it should provide an opportunity for improved access and ensure a high quality development proposal.

The strategic landscape aspects which have influenced the landscape strategy are:

- The site area provides a transition from the urban area to the north and the rural landscape to the south.
- The northern boundary of the site is defined by a hard urban edge along Cockburn Crescent.
- The southern boundary of the site is defined by a historic tree lined field boundary. The field boundary is fragmented and not in great condition but forms a clear boundary and must be
- Through reinforcing the southern boundary the opportunity exists to better define the southern boundary of the town providing a robust and clearly identifiable broad woodland edge.
- The boundary to the east is well defined by Mansfield Road and the mature woodland surrounding Malleny Mills (LNC site).
- The site is distinct from the surrounding rural landscape character and the aim must be to safeguard and enhance this landscape character by better defining the boundaries.
- The existing development pattern is formed by the historic field boundaries and shelter belts.
- Through retaining the cross-form of greenspace and field boundaries, the proposal can continue this pattern, completing the settlement expansion to the natural boundary to the south.



Strategic landscape analysis

The key site aspects which have influence the landscape strategy are:

- The mature woodland that defines three of the site boundaries.
- The existing woodland bisects the site forms a key feature in the landscape and must be retained.
- Existing informal paths connect Cockburn Crescent to the surrounding woodland areas in a number of locations.
- The urban edge to the north, where existing properties overlook the site.
- Good visual and physical connectivity between the site and existing town to the north provide good
 opportunities for integration.
- The opportunity to connect to the existing green space and path network.
- The opportunity to connect to Core Path 19 (Mansfield Road).
- Good public transport access with a high frequency bus service adjoining the site with scope to create an attractive link between new housing and existing bus stops.
- All properties are within 400m of an existing bus stop on Cockburn Crescent.
- The existing bus stop/turning area at the north east of the site area is a key destination but also
 presents issues with noise.
- The existing areas of open space to the north are easily accessed from the site area with good pedestrian connections via the existing path network.
- There is not currently a formal path link adjacent to the woodland spine to the north of the site area connecting to Marchbank Park.
- Marchbank Park, Malleny Park and the school are all within 800m of the site area.
- Views from the site are generally contained and minimised by existing trees but existing views of Pentland Hills to south are possible to the west of the site.
- The design of the frontage to Mansfield Road should reflect the importance of the route (Core Path 19).
- Development on Cockburn Crescent should respect the privacy and setting of the existing and proposed properties. The scale and character of the frontage to Cockburn Crescent must be consistent with the existing street.
- Development can reflect existing urban/rural edge character through linking existing paths, uses
 and natural features with scope to improve legibility through local design features and maximise
 links to areas of existing activity.



Site landscape analysis

4.4 LANDSCAPE APPROACH

4.4.1 Approach to development

The following section describes the approach to accommodating development at Cockburn Crescent as a result of the LVA process and site analysis. The proposed approach is based upon an appreciation and understanding of the existing landscape, with the development form a product of the Landscape Strategy.

Through the process of LVA review and landscape analysis, parts of the site that have immediate capacity to accommodate development have been identified on the diagram opposite. The areas for capacity to accommodate development are set within the proposed landscape structure.

The proposed policies relevant to the environmental protection of the site area have also been considered and how the proposals could address each also noted. This demonstrates how the proposals for Cockburn Crescent can accord with the emerging policy and secure positive benefits to the surrounding environments and for the wider

Respect the character and setting

Any development should be located within the areas identified to ensure it does not negatively impact upon the landscape setting or character of the Pentland Hills landscape to the south. It is considered that by locating development within the areas identified and creating a strong landscape structure following the existing landscape pattern and in particular the existing woodland belts and field boundaries issues relating to landscape setting, visual impact or environmental impacts can be completely mitigated or at least minimised.

Policy ENV 10 - Development in the Green Belt and Countryside

The key test for all proposals in the Green Belt and Countryside areas is to ensure that the development does not detract from the landscape quality and/or rural character of the area. It is considered that within the areas identified development at Cockburn Crescent would comply with the aims of this policy and would not detract from the landscape quality and character of the area.

The Landscape Strategy proposals, as described later in this document, would be of a type and scale such that it would allow the surrounding landscape to fulfil its role in terms of landscape setting whilst improving access to countryside recreation.



Landscape approach



4

A ARCHITECTS + MASTERPLANN

Create a robust landscape structure

Development at Cockburn Crescent should seek to enhance the existing landscape boundaries, creating robust landscape features that will form part of the wider landscape structure. By creating a strong landscape structure the opportunity to create a robust long term boundary to the south of Balerno exists, better defining the southern extent of the town. A strong landscape structure will not only allow the different character areas to be better defined but also create a development character consistent with the adjacent residential areas to the north and east.

The southern boundary would provide a more appropriate boundary to the south of Balerno, softer than the existing hard edge of Cockburn Crescent and a more definitive transition between rural and urban character areas. Viewed from the south the proposed woodland edge would soften the appearance of the settlement boundary and better fit with the wider landscape pattern.

The cSLA 9

The proposed residential development defined by the enhanced landscape structure will provide a more robust boundary to the cSLA, particularly when viewing Balerno from the Pentland Hills. Equally, in terms of landscape character, the proposed boundary revision provides a natural break in character when seen from the ground.

Integration with Balerno

It is important the new development must be viewed as an expansion of the existing settlement of Balerno. It must be developed to integrate with the existing settlement and community and not become another bolt on estate. Development should not set itself apart but should seek to provide good pedestrian and vehicle connections and should be based around integrating the existing landscape features and connecting public spaces. Furthermore it should take advantage of the existing features that give the place its unique character as well as the elements that link these spaces.

The cSLA 9

by a linear group of south-facing houses, fronting Cockburn Crescent with only a single line of small street trees. The proposed development creates an opportunity to ameliorate this hard urban edge by creating a more vibrant two-sided street along Cockburn Crescent itself and planting deciduous woodland along the site's southern boundary. This will significantly enhance biodiversity as well as reassert local landscape character. The woodland will also improve the recreational amenity, particularly in combination with the SUDS strategy, creating a varied, multi-functional series of green open spaces. It is considered that this will create a more logical boundary and identifiable space to reinforce the cSLA designation.

The existing transition between rural and urban areas is characterised

Improved access to open space

The landscape structure should not only provide a structure to accommodate development, it must provide a network of accessible public spaces. Furthermore the proposals should not simply rely on access to existing areas of open space, the landscape structure should be developed to provide access to a range of new public spaces. The provision of high quality useable open space is a key aim of the proposals.

The approach to development at Cockburn Crescent seeks to improve access and connections to the existing areas of open space to the north. New 'Green Links' should be aligned with the existing street network to create safe and direct routes to the existing park to the north. Subject to land control and agreement, there is substantial scope to establish a robust framework of multifunctional green infrastructure in the new development of all scales, and connect this to the wider network of open spaces, habitats, footpaths and cycleways beyond the site boundary.

(Policy Env 18 and Env 19 - Open Space)

It is considered that the proposals described in section 6 and 7 of this document would comply with and could contribute positively to the aims of this policy. Currently the site area is maintained for agriculture with limited access to open space through a network of informal woodland paths.

The development as described and illustrated would not impact adversely upon the quality or character of the local environment and would result in the loss of areas of limited amenity and leisure value whilst providing new areas of open space of high amenity and leisure value.

The proposals would provide a local benefit through increased access to new areas of open space and improved access to the surrounding woodland areas. The Open Space Strategy for the area as described in the following sections of this document describe how the proposals would meet the Council's Open Space Standards and improve the overall network of open space within the surrounding area.

4.5 LANDSCAPE CONCEPT

4.5.1 Landscape concept

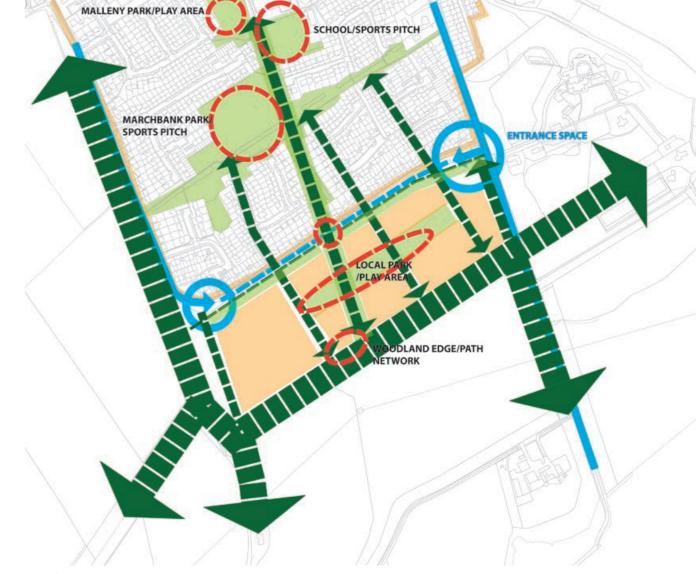
With the landscape led approach to development described and appropriate development areas identified in the previous section, this section describes the landscape concept and basic structure for development at Cockburn Crescent.

The Proposed Local Development Plan recognises that development can bring some benefits through enhancing landscape and creating future landscapes of quality and character in the provision of new green infrastructure. In line with this principle, the following section will explain how a landscape concept for development at Cockburn Crescent will ensure development is sensitively integrated within a landscape setting and will bring a number of benefits to the wider area that comply with the aims of the Development Plan.

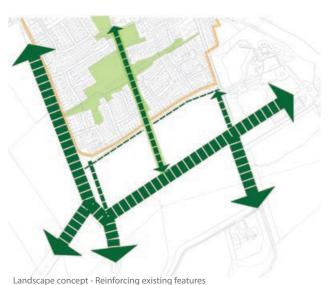
The key aspects of the concept are illustrated on the diagram opposite and identify the main principles that underlie the development proposals which are as follows:

- Retain and enhance the existing woodland edges and field boundaries, helping better define development areas and add character.
- Create new 'green links', connecting the existing residential areas to the new development, these will also maintain a physical and visual connection to the surrounding landscape.
- Utilise the landscape structure to define arrival points, create a clear structure and ensure positive integration with the existing residential area.
- Create a network of connected landscape features and new area of public open spaces.
- Provide opportunities for improved pedestrian connectivity in the area with new and improved path links.

The following sections will describe the key aspects of the landscape concept in more detail.



Landscape concept

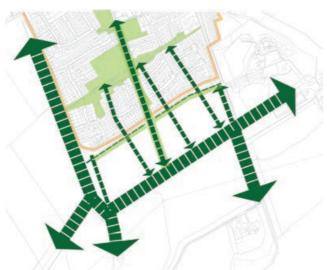


Enhance existing features

The design of the urban edge should form a clear transition between the urban area and surrounding countryside. Through additional planting along the southern and western boundaries a clear transition between the urban area and surrounding countryside will be defined. Given the sensitivity of the site, the design concept addresses the factors which are central to Greenbelt policy. Additional tree planting along boundaries will reinforce the site's containment and mitigate against any impact upon the wider landscape setting. The proposals will also create a strong settlement boundary, whilst the extension of the green space and path network ensure permeability and access to usable rural edge space.

The retention, enhancement and integration of existing trees, shelterbelts and hedgerows will help integrate the development with the character of the surrounding countryside and provide opportunities to extend habitat networks.

The retention of natural features and in particular, the surrounding woodland and the central spine of trees which extends from Dean Park Primary and forms the historic cross pattern on the former lands of Upper Dean Park Farm, will be retained to form the basis of a strong landscape framework.

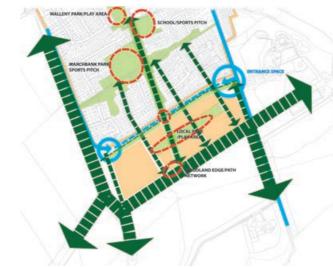


Landscape concept - 'Green Links'

Provide 'Green links' and Integration

The provision of and enhancement of the new areas of public open space will act to connect the site and the existing areas of Balerno to the north, aiding the integration of the development into the local area and bring tangible recreational, cultural and environmental benefits.

In addition to the retention of the existing central spine of trees, new 'green links' should be included. Aligned with the existing street and path network the 'green links' should extend through the site providing physical and visual connection between the existing residential areas and the proposed development area. The 'green links' should provide distinctive features in the layout, aiding legibility and allowing views from Cockburn Crescent south to the Pentland Hills.



Landscape concept - A network of spaces

Create network of spaces

The layout will provide a variety of new areas of public open space that create a well-connected network of 'green' spaces, contributing to the aims of the LDP Open Space Policy. The green network will link together all the areas of open spaces within the site area and the surrounding woodland. It will create an interconnected network that provides recreational opportunities, improves accessibility within the area and enhances biodiversity and the character of the landscape, including the setting of new development.

4.6 LANDSCAPE FRAMEWORK

4.6.1 Landscape framework

This section describes the Landscape Framework which establishes a clear landscape structure for development, whilst allowing more detailed proposals for each of the spaces or features to come forward in due course.

The section describes how the landscape concept has been developed and specifically describes how the Landscape Framework has been developed to meet the Council's expectations for landscape proposals (CEC Design Guidance, 2013) as part of new development.

The key aims of Edinburgh City Council are for new development to:

- Create a robust landscape structure as an integral component at all scales of development, which follows green infrastructure and green network principles.
- Meet the requirements of the Council's strategy for public open space and provide residential private gardens.
- Maintain the conservation status of protected sites and species, and enhance and create new habitat.
- Protect trees and woodland and provide new tree planting.
- Integrate Sustainable Urban Drainage Systems into development so that their visual, landscape and biodiversity potential is maximised
- Ensure that hard landscape and car parking are an integral part of the overall design.

As illustrated on the plan opposite, the provision of a clear structure and network of new spaces is a key aspect of the proposals. The importance of the green network is twofold, to maintain and enhance the landscape setting of the area and to provide new high quality and accessible areas of public open space to the south of Balerno. The robust landscape structure provides the framework in which residential development can be located.



Landscape framework

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4.6.2 SUDs

A Drainage Strategy has been produced to support the Planning Application and identifies two areas for SUDs facilities to be located within the landscape structure.

As part of the Landscape Framework areas for SUDs facilities are identified in both the north east corner of the site adjacent to Mansfield Road and in the north west corner off Cockburn Crescent. The details of the SUDs facilities are identified in the Outline Drainage Strategy produced to support the Planning Application.

The SUDs proposals should be designed to positively contribute to the enhancement of biodiversity preferably by using native plants and investigate the potential for integrated habitat networks. It should be designed as an integral part of the open space network and landscape design, shall be carefully sited, overlooked where possible and designed to minimise risk to public safety. The sites identified for the SUDs have been included within the provision of open space and as such the facilities should be designed as integral to the open space.

4.6.3 Woodland structure

The creation of a robust landscape structure as an integral component of the development is provided by the woodland structure.

A 'Tree Survey and Arboricultural Constraints' plan has informed the Landscape Strategy and will support the Planning Application. The Tree survey has evaluated the existing tree and woodland resource and design development has taken into account above and below ground tree constraints.



4.6 LANDSCAPE FRAMEWORK

Existing woodland

The Landscape Framework recognises the positive contribution that the existing trees will make to the new development and provides a spatial framework that allows for the existing trees to be retained and supplemented with new tree and woodland planting.

In line with the aims of the 'Tree Survey' all the existing trees of suitable condition should be retained as part of the proposals. Existing trees should form the basis of structure planting and adequate space allowed for their ultimate size. All existing trees should be retained in line with the recommendations of the Tree Survey and Arboricultural Assessment.

The proposed Landscape Framework has taken in to account the Tree Constraints Plan contained within the Tree Survey and used the plan to design the site layout and identify areas for new planting Any unavoidable removal of trees should be compensated by replacement with at least extra heavy standard sized trees.

Ecological and Woodland Management Plans should be prepared and enacted at the earliest possible stage to begin the process of enhancement on the site in line with the aims of the Tree Survey and Arboricultural Assessment.

Proposed woodland

The Landscape Framework identifies areas of proposed woodland to supplement the existing woodland areas and reinforce the site boundaries.

The Landscape Framework does not provide specific planting proposals at this stage (a detail Planting Plan would be provided at a later date) but a few key principles are listed below that are relevant to all woodland areas:

- Species selection should be appropriate to the intended location, function and growing space, taking into account ultimate height and spread, and relationship to buildings, paths and roads.
- Use native species where possible, particularly in locations adjacent to an existing woodland areas and wildlife corridor.
- Woodland and structure planting should be carried out in advance of development to allow early establishment.
- Consideration should be given to ease of maintenance and long term establishment.

Proposed woodland planting

The existing tree belts to south and west are augmented by new tree planting varying from 15m to 50m to reinforce a long-term Greenbelt boundary.

Combined with the existing tree belts these will provide a robust woodland belts of similar scale to those to the east and west.

New woodland planting should be provided along the eastern boundary to Mansfield Road to enclose the development area and tie in with the existing woodland to the south. The proposed woodland is to vary from 15-20m to allow for a transition between the development area and the Harmeny School woodland setting to the east.

The retention of the majority of the central tree belt allows for a clear link with the historic field pattern and continuation of trees from the existing residential area to the north. These existing trees should be protected and through a new management regime the alignment supplement with new planting to ensure this alignment remains a key feature through the site.

The existing hedge along Cockburn Crescent must be retained and managed appropriately as part of the proposals for the street. The existing hedge is a not in great condition and if agreed it should be replaced by a suitable replacement mature hedgerow.

4.6.4 Provision of open space

The landscape Framework currently exceeds the requirements of the Council's strategy for the provision of public open space.

The quantum and variety of spaces provided meet the requirements set out in the Open Space Strategy (2010) and contribute positively to the aims of the Proposed LDP Green Belt and Open Space policy.

Policy OS3 - Open Space in new development

The Council will negotiate the provision of new publicly accessible and useable open space in new development when appropriate and justified by the scale of development proposed and the needs it will give rise to. In particular, the Council will seek the provision of links which will extend the network of green corridors when opportunities arise.

The proposals will provide a good connections to the existing areas of Networked Open Space (as identified in the Edinburgh Open Space Strategy) to the north including Malleny Park (A large Greenspace which currently meeting the Standards).

Local greenspace standard

Houses and flats should be within 400 metres walking distance of a significant accessible greenspace of at least 500 sqm. and good quality (for parks and gardens) or fair quality (for other types).

All houses and flat will be within 400m walking distance of the existing open space to the north at Marchbank Park with good links provided via the existing path network.

All houses and flats will be within 400m walking distance of the proposed local park area located at the centre of the development. The local park alone area measures approximately 0.3ha. It is proposed to contain and equipped play area and would be designed to good quality.

Large greenpspace standard

Houses and flats should be within 800 metres walking distance of a significant accessible greenspace of at least 2 hectares and good quality (for parks and gardens) or fair quality (for other types).

All houses and flats will be within 800m of the significant accessible greenspace provided by Malleny Park and Marchbank park, which include a sports pitch and equipped play area.

The areas of useable open space identified within the site area, including the frontage to Cockburn Crescent, the existing woodland spine and the local park area total approximately 2.1ha, providing accessible open space within the site area in addition to the existing space to the north.

The proposed woodland areas will provide an additional 2.0ha of open space, accessed through a network of existing and proposed paths.

Play snace

Houses and flats should have access to at least one of the following:

- A play space of good play value within 800metres walking distance
- A play space of very good play value within 1,200 metres walking distance
- A play space of excellent play value within 2,000 metres direct distance.

Malleny Park is approximately 500m from the northern edge of the site and includes a formal Play Area (of good play value as recognised by CEC). The proposal promote clear and safe links to the park area to the north. The local park area could include an equipped play area if desirable.

Legend Site boundary Existing woodland Proposed woodland (2.0ha) Woodland spine (0.5ha) Green links (0.4ha) Local park area (0.5ha) SUDs spaces (1.2ha) Interface to Cockburn Crescent (0.7ha) Entrance spaces (0.12ha) Proposed location for play area "All areas are approximate based on the Landscape Framework plan

** A description of the function and design principles for each of the spaces listed above is contained in the design principles section of this document.

Hard landscape areas and car parking

The diagram opposite indicates the strategic open space provision within the development. Smaller local open spaces including areas of hard landscape and car parking will be incorporated within the detailed design of these spaces and development blocks where appropriate.

Further as part of the structure streets will be designed firstly as places, creating a pedestrian friendly environment that is easy and safe to move around in and following the principles set out in 'Designing Streets, Policy Statement for Scotland'. By altering elements such as width of street (building to building), tree planting, pathway and cycleway integration the development can ensure the design of the streets within the development create characterful, comfortable, distinct and legible places to be.



4.6 LANDSCAPE FRAMEWORK

4.6.5 Pedestrian connectivity

The ability for pedestrians and cyclists to move through the site using a permeable network of paths is at the core of the design of the Landscape Framework. The path network has been designed to actively encourage walking and cycling as both a viable transport option and also as a recreational pursuit.

Core Path (CEC 19)

The landscape framework allows for at least two points of connection between the existing path on the western boundary and the Core Path, Mansfield Road (CEC19-Harlaw and Threipmuir) on the eastern boundary.

The site framework promotes good connectivity to Core Path 19 allowing good connections to the Pentland Hills and Water of Leith walkway.

Proposed paths

For pedestrians and cyclists the strategic path network identified on the plan opposite will offer many routes to and through the site. The combination of segregated paths and roadside footways will create an interconnected network of direct and convenient links between destinations. Attractive linkages to the external path network in the vicinity of the site are required to offer recreational opportunities and allow future residents the opportunity to make a sustainable travel mode choice.

The plan opposite identifies the strategic path network which must be provided as part of the Landscape Framework. It is expected that this network will be further supplemented by additional pedestrian pathways and routes as appropriate through the masterplanning and detailed design of areas. It is proposed that with the exception of the routes identified in the strategic path network opposite, cyclists will be generally accommodated on the street network. Cycle connections to the site are facilitated via Mansfield Road to the east of the site.

The proposed areas of woodland surrounding the site should include paths with connections to the existing paths to the east and west. These would benefit the wider area in forming a connected network of paths and improving recreational opportunities.

Aspirational path link

Subject to land control and agreement a path link should be provided connecting Cockburn Crescent to Marchbank park to the north. This aspirational path link would improve access for both existing residents of Cockburn Crescent and new residents.



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4.7 LANDSCAPE DESIGN PRINCIPLES

7.1 Design principles

This section describes the intended character, function and key design principles for each of the areas of open space identified in the Landscape Framework.

In the following section these spaces are described in more detail through images, plans and sections, identifying how each feature will differentiate the areas and add character to development at Cockburn Crescent

The core landscape spaces of the landscape framework described in this section include;

- Entrance spaces
- Proposed woodland
- Woodland spine
- Interface to Cockburn Crescent
- Mansfield Road entrance space
- Green links
- Local park area

7.2 Illustrative plan

The illustrative plan opposite has been produced to describe in more detail key design principles for the 'core landscape spaces' previously set out in the Landscape Framework. The guidance aims to ensure that these are developed with a strong identity that responds to both their context and setting and also to their relationship with the wider site.

Some of the key areas and elements of the Landscape Framework are listed below and labelled on the plan opposite.

- 1. Cockburn Crescent
- 2. Mansfield Road
- 3. Whitelea Road
- 4. Greenfield Crescent
- 5. Threipmuir Avenue
- 6. Dean Park Primary School
- 7. Malleny Park (equipped play area)
- 8. Marchbank Park (sports pitch)
- 9. Existing woodland
- 10. Harmeny Community Woodland (LNC site)
- 11. Proposed woodland areas
- 12. Woodland spine
- 13. Proposed 'Green links'
- 14. Cockburn Crescent linear space
- 15. SUDs spaces
- 16. Mansfield Road entrance space
- 17. Local Park Area
- 18. Entrance space
- 19. Proposed development areas

7.2 Entrance spaces

Two small areas of open space should be provided within the Landscape Framework where the Core Path and the existing path network connect to the site area. The spaces should be designed as meeting spaces and include areas of hard landscape and seating and act to connect the surrounding landscape and path networks.

To the south east of the site area a space should be created within the layout where Core Path 19 connects from Mansfield Road. This space should provide a clear pedestrian entrance to the site from Mansfield Road, signed, including a path links and overlooked by the surrounding properties.

An entrance space should be located in the north west of the site area, providing a space where path links from Cockburn Crescent and the surrounding woodland can meet within the site area. The space should be over-looked by surrounding properties and link to the SUDs space to the west.





4.7.4 Woodland edge planting

As described through the concept and Landscape Framework the woodland setting and proposed structural woodland planting is the key character forming element of the area. The illustrative plan clearly depicts the importance of the woodland and the relationships formed between development and woodland. Surrounding the development the woodland areas will provide the key structuring element for the development, creating the setting and defining the character of the area. The plan demonstrates how the existing woodland is to be retained and enhanced to support the creation of distinctive and well enclosed development areas whilst maintaining a strong overall form. The woodland will provide a uniting feature of the site, providing ecological green links and opportunities for path links around the site. Careful management should make it possible for pathways to be identified within woodland areas to allow the residents to fully experience the unique environment in which they are living.

unction

- Define the southern boundary of Balerno and provide a clear boundary between the rural and urban character areas.
- Retain, protect and enhance the existing woodland structure of the area.
- Provide an attractive outlook for residential properties.
- Provide shelter and an improved microclimate for development.
- Provide ecological networks.
- Provide a recreational resource for residents through a network of path connections.

Design principles

- The new areas of woodland planting should provide the necessary space for native woodland habitat to achieve maturity and accommodate multi-user paths and links to the wider countryside.
- Generally across all the development areas buildings should address the woodland edges, helping enhance the character of the area and foster a positive relationship between the community and woodland.
- Where buildings and streets are located next to woodland areas, sufficient space must be provided to maintain root protection zones and avoid over shadowing.
- Woodland areas must be maintained in line with the aims of the Green Space Network of which it forms part, providing valuable habitats and recreational opportunities.
- Woodland should generally be considered as part of the public open space structure with a network of paths (including existing paths) providing identified areas for public access to minimise environmental impact.
- Existing paths within the woodland should be retained and enhanced.
- Where buildings front on to woodland a transition area of public open space should be provided to mitigate against environmental impact and should incorporate path links.
- To ensure both safety of the public and the longevity of the woodland an appropriate management and maintenance regime is necessary. To this end a Management and Maintenance Strategy will be prepared by arboricultural consultants to support the Reserved Matters Application.



Development backing onto woodland

Although the preference is for development to front woodland areas, there are areas where development plots will back on to woodland areas. In these locations larger back gardens should be provided to mitigate against issues of over shadowing and ensure the root protection zones are maintained (see Tree Survey). Gardens adjacent to woodland areas should be suitably enclosed and defined by strong plot boundaries.





Indicative section through proposed woodland edge

Fronting woodland edges

Generally across all the development areas properties should address the woodland edges, helping enhance the character of the area and foster a positive relationship between the community and woodland. Where buildings and streets front the woodland, sufficient space must be provided to maintain root protection zones.





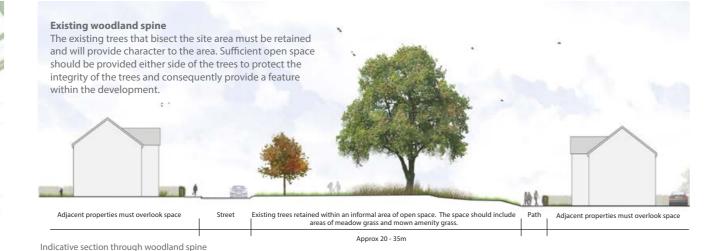


Landscape framework - woodland spine

4.7.5 Existing woodland spine

The woodland spine should be retained with new areas of open space to provide an informal park area. The character of the retained mature beech tree belt and associated stone wall will create a clear and attractive feature through the site and form a pedestrian connection between the existing residential area to the north and the new residential area at Cockburn Crescent.

The retention of this landscape feature and footpath will allow for a clear link with the historic field pattern and continuation of trees from the existing residential area to the north.



Function

- Retain existing trees and reflect the existing landscape pattern.
 Provide improved opportunity for access to open space and the countryside.
- Visually break up the development area,
- Provide an informal Play/Amenity Open Space.
- Provide an attractive outlook for residential properties.
- Provide a clear visual and physical connection between the existing residential area to the north and the structural woodland to the south.
- Provide a clear route for a path connection (existing path).

- Properties on the edge of the space must address and overlook the space, providing an element of natural surveillance and policing.
- All existing trees must be retained where possible to form an integral part of the space. The trees must be managed in accordance with the woodland management plan to ensure safe public access.
- Where the alignment requires to be broken to allow for street connections the loss of existing trees should be minimised.

- These existing trees should be protected and through a new management regime the alignment supplemented with new planting to ensure this alignment remains a key feature through the site.
- Areas of open space should be provided either side of the tree line to protect the trees and allow for informal recreation and include the path links and seating areas.
- Any unavoidable removal of trees should be compensated by replacement with at least extra heavy standard sized trees.
- A new path(s) should be aligned to pass through the space connecting the core public space with the existing residential areas to the north. The path link should have priority over streets through this space.
- Good pedestrian links to adjacent residential areas and neighbourhood centre must be provided.
- Areas of parking may be included within the edge of the park space however it should not dominate or limit access.
- To ensure both safety of the public and the longevity of the woodland an appropriate management and maintenance regime is necessary. To this end a Management and Maintenance Strategy will be prepared by arboricultural consultants to support the Reserved Matters Application.



The woodland spine provides a key landscape feature, physically and visually connecting the new development to the existing residential area to the north.



Landscape framework - Cockburn Crescent Interface

4.7.6 Cockburn Crescent

To respect the setting of the existing properties and mitigate against the visual impact of new development to the south of Cockburn Crescent a linear area of open space of approximately 15m is proposed along the northern boundary. Set behind the existing hedge, which will be retained, the linear space will include street tree planting and provide a continuous high quality landscape treatment to the street. Importantly the landscape treatment will allow the proposed housing to overlook the street whilst being set back an appropriate distance.

Function

- Provide an appropriate set back from the existing street.
- Provide an attractive outlook for both existing and proposed residential properties.
- Allow proposed properties to overlook the street whilst accessed from within the site area.
- Allow the existing hedge to be retained.
- Provide a clear space for a path link to the south of Cockburn Crescent within the site.



- Provide an appropriate set back from the existing street.
- Provide an attractive outlook for both existing and proposed residential properties.
- Allow proposed properties to overlook the street whilst accessed from within the site area.
- Provide an informal area of open space.
- Allow the existing hedge to be retained. (replaced by new hedging if desired).
- Provide a clear space for a path link to the south of Cockburn Crescent within the site.

- The existing hedge must be retained.
- The existing hedge is not in great condition and if agreed it should be replaced by a suitable replacement mature hedgerow.
- Street tree planting should be included along the length of the space to soften the character. Sufficient space must be provided for new tree planting.
- Properties must address and overlook the space.
- Clear plot boundaries (hedges or walls) must define the front garden of proposed properties.
- A pedestrian route should be aligned to pass along the length of the space, connecting the spaces along the alignment, the residential areas and link to the Core Path network.
- Along the length of the space the path link should have priority over streets through this space. The path and street access to the properties fronting the space could be provided through a shared surface.
- Areas of parking may be included within the edge of the space however should not dominate or limit access.





Landscape framework - Mansfield Road

4.7.7 Mansfield Road character

The proposals recognise the importance of Mansfield Road and the Core Path (CEC19) as routes to the Pentland Hills and have designed the layout accordingly.

The corner junction between Mansfield Road and Cockburn Crescent is especially prominent in the approach for south bound road users on Mansfield Road and will be designed with careful consideration. As a result of the prominent location an area of open space has been located on this corner to provide an attractive and recognisable entrance space on Mansfield Road. The space and street will be overlooked by surrounding housing directing views into the site area.

South of the open space the eastern edge of the site area will be defined by structural woodland planting. The woodland planting will act to contain the site and allow a clear transition from urban to rural incorporating a route for Core Path 19 and connections back to the site area.



Function

- Provide a clear entrance space, directing movement into the residential area.
- Provide a location for the SUDs basin.
- Provide a set back from the bus stop/turning area. Maintain path links to the bus stop.
- Allow path links to Core Path 19 and the existing Bus Stop.
- Include a new street connection to Cockburn Crescent.
- Include path connections to the residential area.

- Surrounding properties must overlook the space.
- SUDs (Sustainable Urban Drainage systems) facilities should be designed as an integral part of the space.
- Integrate the SUDs into development so that their visual, landscape and biodiversity potential is maximised.
- The space should be designed as a high quality amenity space and should include seating areas.
- The Core Path must pass through the space. Good links should be provided between the residential areas and the Core Path link.
- Good pedestrian links to adjacent residential area must be provided.
- The space should be carefully designed to ensure it does not become dominated by car parking. Car parking should be located to the side or rear of the properties that overlook the space.
- Woodland planting of approximately 20-25m width should be provided to the west of Mansfield Road and the south of the space to define the eastern edge of the site.



Visualisation of Mansfield Road corner space





4.7.8 Green links

In addition to the feature provided by the existing woodland spine, three further 'green links' should be provided as part of the layout. The 'green links' are spaces between residential areas that should contain elements of soft landscape such as tree planting, shrub beds or grass areas. These spaces should be wider than standard streets to incorporate the landscape features, path links and allow adjacent properties to overlook.

Aligned with the existing streets to the north, the 'green links' should provide clear routes connecting Cockburn Crescent to the north through to the woodland defining the southern boundary. These links will reflect the geometric field pattern, providing distinctive spaces between adjacent residential areas that ensure the new development is well integrated with the existing residential area to the north. The links will provide path links and allow views through the site to the woodland along the southern boundary and out to the Pentland Hills where they appear over the woodland.





Function

- The 'Green Links' should be designed as the interface between residential areas incorporating streets and paths providing access to the adjacent properties.
- The exact detail of the 'green links' should be defined as part of the future Reserved Matters Application.
- The links must be distinct streets or spaces along the alignment identified and must incorporate tree planting to distinguish them from other streets and add character.
- The links must contain a path connecting existing paths along the southern boundary to Cockburn Crescent.
- The links should be aligned to allow views through the site to the south towards the Pentland Hills and a connection to the woodland.

Design principles

- Where possible the spaces should not include streets with adjacent properties accessed from the rear.
- If the space requires a street to access properties it should be designed as a shared surface or aligned to one side of the space.
- The spaces should be designed to incorporate the alignment of path links and should be predominantly a soft landscape area with some areas for informal play and seating.
- The space should be designed to accommodate both active and passive activities as well as the path links and incorporate areas of high quality soft and hard landscape design.
- Where the paths cross residential streets, the priority should be given to the alignment of the path with surface materials defining the alignment.
- Buildings on either side must overlook the spaces.
- Clear plot boundaries of walls, hedges or railings should provide a clear definition between private gardens and the public space.
- Areas of parking may be included within the spaces however should not dominate or limit access.



Landscape framework - Green Links

4.7.9 Local park area

A local park area should be provided to create a publicly accessible open space at the centre of the site. The park will allow for a range of recreational activities and provide for equipped and natural play spaces.

A formal park space should be provided at the centre of the new residential area to ensure all properties have good access to an area of usable open space within the residential area. The park space should straddle the existing woodland spine and connect the 'green links' on either side providing an accessible central focus within the area.

The park will form a residential amenity space allowing the existing trees to be retained and add to the rich character of the area. The space will help define the character of the area and should be one that the local people can recognise and use to meet and socialise.



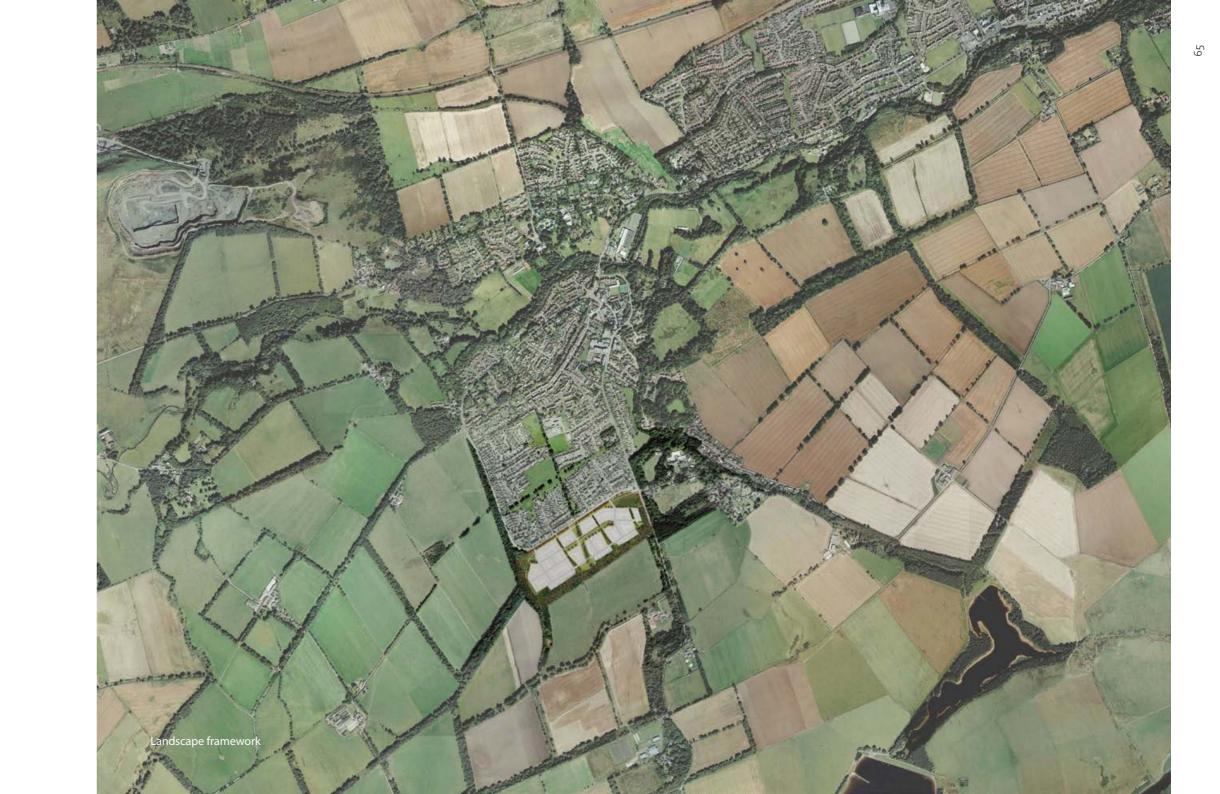
Function

- Provide an accessible area of public open space (local park area) for the new residents.
- The open space should be designed to cater for a variety of uses.
- Provide an equipped play area.
- Provide space for informal play/amenity open space.
- Provide an attractive setting for adjacent properties.
- Act to break up the skyline of the residential development.
- The local park area will support the wider green network by conserving and linking landscape and habitat features.

- The park should be designed to Local green space standard and good quality (for parks and gardens).
- The park should contain a play space of good play value (CEC Standards).
- All surrounding properties must overlook the park to provide passive surveillance.
- The spaces should contain street tree planting and ornamental areas of planting in keeping with the character of the area.
- Spaces should contain areas for seating, informal play, and play equipment for younger children.
- Areas of parking may be included within the edge of the spaces however should not dominate or limit access'
- All existing trees must be retained forming an integral part of the space.
- The trees must be managed in accordance with a Management and Maintenance Strategy prepared by arboricultural consultants to support the first detailed Planning Application.

4.7.9 Summary of landscape strategy

The plan opposite illustrates how the landscape framework can provide a robust southern boundary to Balerno and help achieve the aims of the Second Proposed LDP policy Des 9: Urban Edge Development. The landscape structure will act to conserve and enhance the landscape setting of the town helping strengthen the green belt boundary. The plan illustrates how the overall character and quality of the wider landscape will not be unacceptably compromised through careful development of the site area and indeed that an opportunity exists to enhance aspects of the site including establishing robust landscape boundaries and the contribution that it can make towards improved accessibility to open space. The landscape structure provides the opportunity to improve access a range of areas of public open space which will help integrate the development as part of Balerno.



5.0: MASTERPLAN



5.0 : MASTERPLAN

The layout has been developed in line with design guidance Designing Places and Designing Streets, as well as the relevant City of Edinburgh Council design guidance.

The indicative layout continues and complements the built form of Balerno, with street spacing reflecting the existing urban grain, albeit without culs-de-sac.

The location is the edge of Balerno, and as such has a strong rural character and natural features which have been retained and enhanced. The tree belt to the south has been strengthened, and the existing line of trees which bisects the site suggest a natural route through the site. Pedestrian links to the tree belt have been introduced from either side of the development, to strengthen the connection to the green space.

A hierarchy of streets is achieved through planting, road width and geometry, and the relationship between the built form and the movement framework. A varied setback from the roadway creates an informal feel in keeping with the surrounding built form, while proliferant planting at nodes and primary routes emphasises the rural nature of the site.

6.0: CONCLUSION



5.0: CONCLUSION

This site represents an excellent opportunity to provide necessary family and affordable housing within an area already suited to this type of development.

The development will complement the existing built form of Balerno, and form the new edge to the settlement, in a form which both creates a pleasant neighbourhood suitable for such a location, and enhances the amenity and outlook for the public through the creation of high quality open space.

The existing landscape, the setting, the existing natural features and the surrounding settlement and views have informed the design of the layout, which looks to balance the edge condition with a safe and well integrated development.

The intention has been to integrate the layout not only with the natural features, but also with the existing movement framework and transport network. This will create a sustainable and outward looking development which sits naturally in its surroundings and provides amenity to the wider area.



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