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Response Type

On behalf of:

Supporting Info

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Choice **1 A**

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

Short Response

Explanation

Choice **1 B**

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

Short Response

Explanation

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Choice **1 C**

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

Short Response

Explanation

Choice **1 D**

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

Short Response

Explanation

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Choice 1 E

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

Short Response

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

Choice 1 F

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

Short Response

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

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Choice **1 F**

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

Short Response

Explanation

Choice **1 G**

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

Short Response

Explanation

Choice **1 H**

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

Short Response

Explanation

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Choice **2 A**

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

Short Response

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

Choice **2 B**

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

Short Response

Explanation We acknowledge the Council’s aspiration to ensure the efficient use of land by achieving enhanced density and coverage across development sites. While we would caution that challenges will inevitably lie ahead in achieving target density in harmony with the existing scale, character and settlement pattern of locations such as Kirkliston, we will work with the Council to achieve its ambitions. In our view, there should be flexibility for developers and designers to respond to the local context and the market for different types of housing. We therefore suggest the following wording for a new policy on density. ALL NEW HOUSING SITES WILL BE EXPECTED TO BE DESIGNED TO ENSURE THE EFFICIENT USE OF LAND AND OPTIMISE HOUSING DENSITIES. THE APPROPRIATE DENSITY WILL DEPEND ON LOCAL CONTEXT. THE ACCESSIBILITY OF THE SITE TO PUBLIC TRANSPORT AND OTHER RELEVANT SERVICES, AND THE NEED TO ENCOURAGE AND SUPPORT THE PROVISION OF LOCAL FACILITIES NECESSARY TO HIGH QUALITY URBAN LIVING WILL SUPPORT INCREASED DENSITIES SUBJECT TO SITE SPECIFIC CONSIDERATIONS. THIS SHOULD BE ACHIEVED BY USING A FULL RANGE OF HOUSE TYPES AND SIZES.

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Choice **2 C**

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

Short Response

Explanation

Choice **2 D**

**We want all development, including student housing, to deliver quality open space and public realm, useable for a range of activities, including drying space, without losing densities. Do you agree with this? - Yes / No**

Short Response

Explanation

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Choice **3 A**

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

Short Response

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

Choice **4 A**

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

Short Response

**Explanation**

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Choice **4 B**

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

Short Response

Explanation

Choice **5 A**

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

Short Response

Explanation

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Choice 5 B

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

Short Response

Explanation

Choice 5 C

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

Short Response

Explanation

Choice 5 D1

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

Short Response

Explanation

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Choice 5 D2

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

Short Response

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

Choice 5 E

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

Short Response

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

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Choice **6 A**

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

Short Response

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

Choice **6 B**

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

Short Response

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

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Choice **7 A**

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

Short Response

Explanation

Choice **7 B**

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

Short Response

Explanation

Choice **7 C**

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

Short Response

Explanation

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Choice **7 D**

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

Short Response

Explanation

Choice **8 A**

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

Short Response

Explanation

Choice **8 B**

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

Short Response

Explanation

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Choice 8 C

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

Short Response

Explanation

Choice 8 C

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

Short Response

Explanation

Choice 9 A

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

Short Response

Explanation

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Choice **9 B**

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

Short Response

Explanation

Choice **10 A**

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

Short Response

Explanation

Choice **10 B**

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

Short Response

Explanation

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Choice 10 C

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

Short Response

Explanation

Choice 11 A

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

Short Response

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

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Response Type: Agent / Consultant  
On behalf of: BDW Trading/Taylor Wimpey

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

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: No

Explanation: We 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. Where a strict prescriptive approach to the proportion of different types is taken, this can have a negative impact on viability, delivery timescales and design.

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Choice 12 A

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

Short Response: Not Answered

**Explanation**

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

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

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

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

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future. Therefore, I consider that it can be effectively used to predict the amount of the established supply that is considered to become effective during the periods 2027 to 2032 and 2033 to 2040.” (para. 26, p. 193, Issue 14)The Housing Land Study identifies the future delivery of 7,468 houses on constrained sites. This is a highly optimistic assumption given that constrained sites by their nature have impediments to overcome and no identified solution. In some cases we accept that these constraints may be overcome. However, equally sites which are currently considered effective may become constrained over time. Therefore, in our view, only currently effective sites should be relied upon to contribute to the land supply and this approach was also endorsed in the Report of Examination for the Aberdeen City and Shire SDP.THUS, AGAINST THE COUNCIL’S ASSUMPTION THAT THE EXISTING HOUSING LAND SUPPLY WILL DELIVER 30,164 UNITS, WE ARE OF THE VIEW THAT THIS SHOULD BE ASSUMED TO BE 21,055 UNITS.ESTABLISHING THE HOUSING LAND REQUIREMENTSScottish Planning Policy (para 115) requires plans to allocate 10 – 20% more homes than the Housing Supply Target figure to provide generosity and flexibility. The Choices document proposes the lowest level of generosity at 10%. We support this approach but only on the basis that no delivery is assumed from constrained sites as described above and also that a more realistic approach is taken to delivery assumptions from the 142 ‘new’ brownfield sites described in the Housing Study (see below). The Council’s delivery assumptions are highly speculative and optimistic in our view and even if generosity was pegged at 20% it would be too little to account for the risk of the supposed supply not delivering.SO THERE IS A BALANCE TO BE STRUCK BETWEEN THE RELATIVE RISK OF THE ESTABLISHED HOUSING LAND SUPPLY NOT DELIVERING AS PREDICTED AND THE %AGE GENEROSITY. IN THE CONTEXT OF THE ASSUMPTIONS MADE IN CHOICES 2030, IT SHOULD BE SET AT 20% AT LEAST.HOWEVER, IN THE FOLLOWING SECTION WE HAVE USED A FIGURE OF 10%, ON THE BASIS THAT MORE REALISTIC DELIVERY ASSUMPTIONS FOR CONSTRAINED AND NEW BROWNFIELD SITES WILL BE USED.NEW LAND REQUIREMENTFollowing on from the above considerations, it is reasonably straight forward to calculate the number of new homes for which new land needs to be allocated in CityPlan. Housing Need & Demand 2019 – 2032: 7,174 unitsHousing Supply Target: 67,174 unitsHousing Land Requirement (HST + 10%) 73,892 unitsEffective Housing Supply: 21,055 unitsNew Land Requirement: 52,837 unitsCRITIQUE OF OPTIONS 1, 2 AND 3 IN CHOICES 2030OPTION 1Option 1 proposes to deliver 17,600 houses in the plan period on land within the urban area through rapid intervention by the Council and its public sector partners. If landowners do not bring forward the identified sites for development the Council proposes compulsory purchase.As explained in the Housing Land Study, 142 brownfield sites have been identified which are stated to have medium to high potential for housing. As we explain below there is not any evidence presented to indicate that this is in fact the case. Some of the sites may meet planning objectives e.g. proximity to public transport, but there is significant doubt regarding delivery.Although we fully recognise and support the priority to bring forward brownfield land for development, unfortunately Option 1 has a number of fundamental problems which should rule it completely out of contention.Firstly, the identified capacity of 17,600 is only about 33% of the number of additional new houses required to meet Edinburgh’s need and demand.Secondly, it is highly unlikely that the 142 identified sites will be developed in their entirety by 2032.The deliverability of these sites has not been considered in the Housing Study. Important basic information about the sites is apparently unknown including whether the owner is interested in selling / developing the site and who owns them. Just 6ha of land (capacity for 428 dwellings) is identified as suitable. A further 140ha is identified as being partially suitable for development (7,767 dwellings) and 127ha (8,406 dwellings) as unsuitable. Nevertheless, it has been assumed that all of these sites, whatever their classification will be delivered in full during the plan period, apparently disregarding the suitability review. Of the 275ha of land just 11ha is vacant. The delivery of the land therefore assumes that the operation of existing businesses or public sector organisations will cease. For this to be the case residential development would need to create a land value in excess of the value of the premises in its current use and provide sufficient incentive for the landowner to sell. This has not been considered in the Housing Study and should not necessarily be assumed for the following reasons:1.The change of use of industrial to residential will have a heavy cost burden, including significant developer

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

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

Choice 12 B1

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

Short Response Not Answered

Explanation

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Choice **12 B2**

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

Short Response

Explanation

Choice **12 B3**

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

Short Response

Explanation

Choice **12 B4**

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

Short Response

Explanation

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Name

Email

Response Type

On behalf of:

Choice **12 B5**

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

Short Response

Explanation

Choice **12 B6**

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

Short Response

Explanation

Choice **12 B7**

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

Short Response

Explanation

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Supporting Info

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Choice **12 B8**

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

Short Response

Explanation

Choice **12 B9**

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

Short Response

Explanation

Choice **12 B10**

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

Short Response

Explanation

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Choice 12 BX

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

Short Response Not Answered

**Explanation** Taylor Wimpey and Barratt Homes support the proposed development allocation at Kirkliston. JTP have prepared a Vision Document for the land controlled by Taylor Wimpey and Barratt, which is submitted in response to Q12C. An indicative layout for the site is also submitted. The land controlled by TW/Barratt comprises 37 hectares north of Burnshot Road and forms a significant and central component to the development allocation proposed in Choices 2030. It is adjacent to other land being promoted for development which together comprise the overall site. This includes Hopetoun Estate land to the north of the railway line and the Miller Homes promoted land to the east and south of our site. We can confirm that whilst we consider that the TW/Barratt land provides a standalone opportunity for a comprehensive and sustainable community expansion, TW/Barratt are happy to work collaboratively with other landowners for a wider proposal. The Vision Document provides a more detailed assessment of the opportunity for the development of the TW/Barratt land, but its key benefits can be summarised as follows:

- Land within the site can be made available for an Education Campus, including secondary, primary and nursery schools of a size to be agreed with the Council. The Vision Document shows a potential location and layout, subject to further discussion.
- The provision of approximately 600 homes, depending on the density of development. JTP have considered a possible layout for the site, taking account of technical opportunities and constraints, landscape capacity and the existing character of Kirkliston. There are proposed zones of high, medium and low density housing, which take account of the Council's aspiration to achieve a minimum of 65 dwellings/hectare. TW/Barratt are happy to discuss these proposals further with the Council. Ultimately, TW/Barratt will bring forward proposals for the site which comply with the replacement LDP's adopted policies.
- The creation of a place that helps us live healthily and in harmony with the landscape; a place which caters for all stages of life – from starter family homes to downsizer homes; a place that appeals to flexible ways of living; and a place that creates community through built-in opportunities.
- Providing good proximity to services and public transport.
- Providing plentiful green open spaces.
- The creation of a place where it is a pleasure to walk or cycle, or for children to play on the street, or for people to bump into neighbours and stop for a chat.
- An opportunity for imaginative interventions related to electric vehicle charging provision and city car club usage.
- The development will make a significant contribution to the local economy, and also to the provision of community facilities and social infrastructure for the benefit of all.

• Within the proposed development we will take design inspiration from historic local settlements such as South Queensferry, Linlithgow and Kirkliston itself. The masterplan will be comprised of different character areas and spaces which will make Almondhill a rich and beautiful place to live. In doing so, our aim is to create an exemplary settlement expansion for Kirkliston, which will contribute positively to the existing settlement and the local landscape setting. There are no technical constraints associated with the site which would prevent its development and the site can be drained for foul and surface water. A High Pressure Gas Pipeline runs across the site and will be accommodated within the proposed masterplan. Connection to utility providers is available with water, gas, telecoms and electrical supplies located either within or in the immediate vicinity of the site. The TW/Barratt site is largely covered by the Craigbrae Site Assessment contained in the Choices 2030 Housing Study. We have taken the opportunity to ask our expert team to review this Assessment and provide comments on the conclusions below. We trust that these comments will be taken into account in the further consideration of the site's allocation in the LDP. We have listed below each of the Assessment

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criteria and conclusions for the Craigbrae area, and provide our comments in capital letters: Does the site fit within an area identified as a strategic development area? No – The site is not within an identified SDACOMMENT: THIS IS CORRECT BUT SESPLAN 1 POLICY 7 DOES SUPPORT THE ALLOCATION OF SITES IN THE LDP WHICH ARE OUTWITH AN SDA ON THE FOLLOWING CONDITIONS: A. THE DEVELOPMENT WILL BE IN KEEPING WITH THE CHARACTER OF THE SETTLEMENT AND LOCAL AREA; B. THE DEVELOPMENT WILL NOT UNDERMINE GREEN BELT OBJECTIVES; AND C. ANY ADDITIONAL INFRASTRUCTURE REQUIRED AS A RESULT OF THE DEVELOPMENT IS EITHER COMMITTED OR TO BE FUNDED BY THE DEVELOPER AS EXPLAINED IN COMMENTS BELOW, ALL OF THESE CONDITIONS CAN BE MET. Does the site support travel by foot to identified convenience services? Partially – The site is within walking distance of local convenience centres but access is impeded by the lack of pavement along the main road leading to the shop. COMMENT: ALTHOUGH THERE IS CURRENTLY NO CONTINUOUS FOOTWAY ON BURNSHOT ROAD BACK TO KIRKLISTON, BDW AND TW CONTROL THE LAND TO THE SOUTH OF BURNSHOT ROAD WHICH COULD BE USED TO PROVIDE A CONTINUOUS FOOTPATH. CONNECTIONS FROM THE SITE TO THE EXISTING SEGREGATED RAILWAY FOOTPATH CAN ALSO BE MADE FROM THE SITE THROUGH THIS LAND TO THE SOUTH OF BURNSHOT ROAD. THERE IS A FOOTPATH AVAILABLE VIA HOUSEFIELD DRIVE LEADING BACK TO QUEENSFERRY ROAD AND HENCE THE CENTRE OF THE TOWN. THE PROPOSALS FOR THE SITE ALSO INCLUDE NEIGHBOURHOOD SHOPPING WITHIN THE SITE WHICH WILL BE EASILY REACHED ON FOOT. Does the site have access to the wider cycle network? No – The site does not have access to the wider cycle network and access is unlikely to be improved as no suitable potential cycle route interventions have been identified which could serve the site. Upgrade of the adjacent railway path could change this but is not committed. COMMENT: THE ADJACENT RAILWAY PATH IS IDENTIFIED ON QUIET ROUTES MAPPING AS AN ‘OTHER PATH’ AND IS INCLUDED AS A FUTURE PATH IN THE ATAP REFRESH (MAP ON PAGE 21). WHILST IT IS NOT COMMITTED, DEVELOPMENT COULD BE ANTICIPATED TO ASSIST IN ITS PROVISION. Can the site support active travel overall through appropriate intervention? No – The site would not support active travel overall, as the site is not within walking distance of employment clusters and these are unlikely to be provided through development due to lack of scope for development nearby. Access to the wider cycle network is poor and it is unlikely to be improved through an identified intervention, though there may be scope to…… (unfortunately the remaining text is missing from the Housing Study) COMMENT: CONTRARY TO THE COMMENTS IN THE STUDY, FOOTPATHS DO EXIST TO CONNECT THE SITE WITH KIRKLISTON AND THE CYCLE NETWORK COULD BE IMPROVED AND EXPANDED AS A RESULT OF DEVELOPMENT OF THE SITE. THIS WOULD ALSO AFFORD NOT ONLY A CHANCE TO UPGRADE THE RAILWAY PATH TO THE SOUTH, BUT TO PROVIDE A CONNECTION TO THE NORTH-WEST WHERE AN EXISTING CYCLE PATH ON THE B800 CAN ALSO BE REACHED. THE ATAP REFRESH STUDY STATES “ON THE QUIET ROUTES NETWORK, COHERENCE IS OF THE UTMOST IMPORTANCE. A SINGLE ‘MISSING LINK’ CAN SERIOUSLY UNDERMINE THE EFFECTIVENESS OF A ROUTE OR THE ENTIRE NETWORK.” DEVELOPING HERE CAN PLUG SOME CYCLE ROUTE GAPS. IT IS WORTH NOTING THAT PROVIDING A NEW SECONDARY SCHOOL IN KIRKLISTON WILL MAKE IT A LOT EASIER AND SAFER FOR PUPILS TO WALK AND CYCLE TO SCHOOL AND REDUCE THE NEED FOR CAR TRIPS TO SOUTH QUEENSFERRY. Does the site support travel by public transport through existing public transport network accessibility and capacity? No – The site does not support travel by public transport based on existing or incrementally improved provision. COMMENT: EXISTING PUBLIC TRANSPORT ACCESSIBILITY IS COMPROMISED BY THE FACT THE SITE IS NOT YET DEVELOPED. PUBLIC TRANSPORT SERVICES EXIST NEARBY IN KIRKLISTON, DIVERSION ROUTES CAN BE PROVIDED AND THE QUANTUM OF DEVELOPMENT WOULD HELP SUPPORT PUBLIC TRANSPORT SERVICES FOR NEW AND EXISTING USERS. Is the site potentially served by an identified public transport intervention project which is deliverable in the plan period to serve and accommodate development? No – The site does not support travel by public transport based on existing or incrementally improved provision. COMMENT – DIVERSION OPPORTUNITIES FOR PUBLIC TRANSPORT SERVICES EXIST AS A CONSEQUENCE OF DEVELOPMENT OF THE SITE. PARK AND RIDE PROVISION BEING DEVELOPED AS PART OF THE WINCHBURGH MASTERPLAN. THERE IS ALSO POTENTIAL TO CONSIDER A RAIL HALT TO THE NORTH OF THE SITE. HOPETOUN ESTATES HAVE CONFIRMED THE AVAILABILITY OF LAND FOR THIS SHOULD IT BE A COUNCIL ASPIRATION. Does the site

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have sufficient primary school infrastructure capacity to accommodate the development without further intervention?No – The site does not have sufficient primary school infrastructure capacity.COMMENT: SEE BELOWDoes the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?No – The site does not have sufficient secondary school infrastructure capacity.COMMENT: SEE BELOWIf either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?Partially – The site does not have sufficient community infrastructure capacity to support development and no appropriate intervention has been identified to address this. A new primary school would be required. A new secondary school would be required. The Council’s preference is to deliver new secondary schools with a capacity for 1200 pupils. If a new 1200 secondary school was delivered it could accommodate pupils from Kirkliston but also support a significant amount of additional housing development. Good active travel and transport links would be important. The level of development proposed here would require at least a new primary and a new secondary school which would also serve the existing population of Kirkliston which does not yet have a secondary school.COMMENT: THE TW & BARRATT HOMES VISION DOCUMENT PROPOSES A SITE FOR A NEW EDUCATION CAMPUS, INCORPORATING EARLY YEARS, PRIMARY AND SECONDARY PROVISION AS WELL AS POTENTIAL FOR COMMUNITY USE AREA WHICH CAN BE DISCUSSED FURTHER WITH THE COUNCIL IN TERMS OF SIZE AND THE FACILITIES PROPOSED.Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?No – No scope is identified for development on this site due to the substantial extent any development would have to cover to take advantage of a change in landform to form a new robust settlement boundary and mostly lie at a substantial distance from the core of Kirkliston. This change in landform is a steep slope towards the north east of the site which may form a natural boundary if enough scope for development is found in this area.COMMENT: AS SET OUT IN THE VISION DOCUMENT SUBMITTED IN RESPONSE TO Q12C, THE TW/BARRATT LAND CAN BE DEVELOPED IN A WAY THAT MAINTAINS THE IDENTITY, CHARACTER AND LANDSCAPING OF KIRKLISTON, AND WILL NOT RESULT IN COALESCENCE. A LANDSCAPE ASSESSMENT OF THE AREA HAS BEEN UNDERTAKEN; EXTRACTS OF WHICH INCLUDING A TOPOGRAPHICAL MAP AND A PLAN SHOWING THE OUTCOMES OF A ZONE OF THEORETICAL VISIBILITY EXERCISE HAVE BEEN INCLUDED IN THE LANDSCAPE SECTION OF THE BROCHURE. THE MASTERPLAN HAS BEEN DEVELOPED ACCORDING TO THE FINDINGS OF THIS ASSESSMENT, INCLUDING KEEPING DEVELOPMENT AWAY FROM THE MORE VISUALLY PROMINENT AREA TO THE NORTH WEST OF THE SITE. Would development of the site avoid significant loss of landscape-scale land identified as being of existing or potential value for the strategic green network?Partially – The site may be considered of value for the strategic green network, due to lying within an area identified as a green network opportunity adjacent to Kirkliston and West Edinburgh.COMMENT: SEE OUR COMMENT ON THE PREVIOUS CRITERION. ALSO, THE TW/BARRATT LAND CAN BE DEVELOPED IN A WAY THAT ENHANCES LINKAGES TO THE GREEN NETWORK. LANDSCAPING AND OPEN SPACE AREAS WILL BE PROVIDED ACROSS THE SITE, INTEGRATED WITH CYCLE AND FOOTPATH ROUTES, BOTH OF WHICH CAN CONNECT INTO SURROUNDING GREEN NETWORKS AND GREEN TRAVEL CORRIDORS. Is the site suitable for development?Yes The site is considered suitable for development, despite not being within the SESplan Strategic Development Areas as set out in its spatial strategy, poor accessibility and open landscape separate from the core of Kirkliston. The site should be considered as an urban extension of Kirkliston. Any development should have regard to improving Burnshot Road for active travel and public transport, upgrading the adjacent railway path as a suitable active travel route, the need for a new secondary school in Kirkliston and the lack of existing settlement boundary east of the existing urban area. Although public transport access remains poor and no intervention is identified to address this, measures to mitigate this through minor intervention should be investigated. As the site is not within the SESplan spatial strategy it should be considered as a reasonable alternative to other sites within the Strategic Development Areas. Development of the site will result in a new settlement boundary east of the existing village and opportunities to enhance screening by tree planting in relevant areas should be considered, either closer to the village above the route of a gas pipeline which must remain undeveloped, or further to the north east where a change in landform could form a new boundary. Accessibility improvements are required to enable development, and improvements to the

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railway path adjacent to the site to make it suitable as an active travel route should be delivered as well as improvements to Burnshot Road to improve walking and public transport. A strategy for improving public transport access to this area should be considered. As part of the development of a wider strategic green network, connections should be made to the adjacent railway path which could form a potential corridor forming part the network. The level of development proposed here and in adjacent sites would require at least one new non-denominational primary school. There would be a partial requirement for one new roman catholic primary school, one new non-denominational secondary school and one new roman catholic secondary school to address growth here and citywide. These requirements should be co-ordinated through a brief for this and other sites identified in Kirkliston.COMMENT – WE AGREE WITH MOST OF THE ABOVE COMMENTS. WE DO NOT AGREE WITH THE CONCLUSION THAT BECAUSE THE SITE IS NOT WITHIN THE SESPLAN 1 STRATEGIC DEVELOPMENT AREA IT SHOULD BE CONSIDERED AS A REASONABLE ALTERNATIVE TO THOSE SITES THAT ARE. THIS WAS NOT THE APPROACH TAKEN IN LDP1, WHICH ALLOCATED A NUMBER OF SITES OUTWITH THE SDA IN PREFERENCE TO SITES WITHIN THE SDA. EACH SITE SHOULD BE CONSIDERED ON ITS INDIVIDUAL MERITS REGARDING THE CRITERIA IDENTIFIED IN SESPLAN POLICY 7, WHICH DOES NOT DISTINGUISH BETWEEN SITES WITHIN OR OUTWITH THE SDA IN TERMS OF ALLOCATION.TW/BARRATT ARE KEEN TO WORK WITH THE COUNCIL TO DEVELOP PROPOSALS FOR THIS AREA, INCLUDING INCORPORATION OF CONNECTIONS INTO SURROUNDING CYCLE AND PEDESTRIAN ROUTES, LINKING INTO AND PROVIDING GREEN NETWORKS THROUGH THE SITE AND WORKING WITH THE COUNCIL TO DELIVER LAND FOR AN EDUCATION CAMPUS. BDW AND TW WOULD ALSO BE KEEN TO BE INVOLVED IN THE PREPARATION OF ANY PLACE BRIEF FOR THE AREA AND WOULD BE WILLING TO WORK CLOSELY WITH ANY OTHER LANDOWNERS WHOSE LAND IS ALLOCATED FOR DEVELOPMENT IN THE AREA. IN ADDITION WE NOTE THAT THE SITE IS WITHIN THE WEST EDINBURGH AREA OF SEARCH WHERE THE COUNCIL CONSIDERS THAT THERE IS POTENTIAL FOR DEVELOPMENT IN THE CONTEXT OF TRANSPORT AND CITY DEAL FUNDING. THIS ADDS TO THE ARGUMENT THAT THE SITE SHOULD NOT BE CONSIDERED AS A ‘REASONABLE ALTERNATIVE’ TO SDA SITES.TW/BARRATT SHOULD BE IDENTIFIED AS A KEY STAKEHOLDER WITHIN THE WEST EDINBURGH STUDY AREA, HOUSING BEING A DRIVER OF EMPLOYMENT AND SPENDING AS WELL PROVIDING INFRASTRUCTURE.

Choice **12 C**

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

Short Response

Explanation

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Choice **12 C**

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

Short Response

Explanation

Choice **12 C**

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

Short Response

Explanation

Choice **12 D**

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

Short Response

Explanation

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Choice 13 A

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

Short Response

Explanation

Choice 14 A

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

Short Response

Explanation

Choice 14 B

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

Short Response

Explanation

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Choice **14 C**

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

Short Response

Explanation

Choice **15 A**

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

Short Response

Explanation

Choice **15 B**

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

Short Response

Explanation

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Choice 15 C

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

Short Response

Explanation

Choice 15 D

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

Short Response

Explanation

Choice 15 E

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

Short Response

Explanation

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Choice 15 G

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

Short Response

Explanation

Choice 16 A1

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

Short Response

Explanation

Choice 16 A2

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

Short Response

Explanation

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Choice **16 A3**

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

Short Response

Explanation

Choice **16 A4**

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

Short Response

Explanation

Choice **16 A5**

**We want to continue to support office development in other accessible locations elsewhere in the urban area. Do you agree? - Yes / No**

Short Response

Explanation

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Response Type

On behalf of:

Choice 16 A5

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

Short Response

Explanation

Choice 16 B

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

Short Response

Explanation

Choice 16 C

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

Short Response

Explanation

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On behalf of:

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Choice 16 E1

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

Short Response

Explanation

Choice 16 E2

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

Short Response

Explanation

Choice 16 E3

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

Short Response

Explanation

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Name   
Response Type   
On behalf of:

Supporting Info   
Email

Choice 16 E4

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

Short Response

Explanation

Choice 16 E5

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

Short Response

Explanation

Choice 16 E6

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

Short Response

Explanation

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

Supporting Info   
Email

Choice 16 E7

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

Short Response

Explanation

Choice 16 E8

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

Short Response

Explanation

Choice 16 EX

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

Short Response

Explanation

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

Supporting Info   
Email

Choice **16 F**

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

Short Response

Explanation

Choice **16 G**

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

Short Response

Explanation

Choice **16 H**

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

Short Response

Explanation

**Customer Ref:**       **Response Ref:**

**Name**

**Response Type**

**On behalf of:**

**Supporting Info**

**Email**

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## Response ID ANON-KU2U-GT23-7

Submitted to **Choices for City Plan 2030**

Submitted on **2020-04-29 17:40:25**

### Your information and data

#### 1 What is your name?

**Name:**

Holder Planning

#### 2 What is your email address?

**Email:**

robin@holderplanning.co.uk

#### 3. If you do not have an email address What is your address?

**Full address including postcode:**

#### 4 I am responding as

Agent / Consultant

#### 5 IF you are responding on behalf of an organisation or an other individual, what is their name?

**Agent on behalf of:**

BDW Trading/Taylor Wimpey

#### 6 I agree to my response being published to this consultation.

Yes

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

**1A We want to connect our places, parks and green spaces together as part of a city-wide, regional, and national green network. We want new development to connect to, and deliver this network. Do you agree with this?**

Not Answered

**Explain why:**

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

**1B We want to change our policy to require all development (including change of use) to include green and blue infrastructure. Do you agree with this?**

Not Answered

**Explain why:**

There is not enough information given to agree or disagree.

We support the principle of providing green and blue infrastructure where practical and affordable.

In terms of SUDS, there have been occasions where Local Authority requests and Scottish Water's vesting requirements do not align— particularly with regard to the level of surface water storage. Requirements for drainage infrastructure must be based on sound technical solutions and agreed in line with the requirements of SEPA and Scottish Water to allow vesting. Given the requirement at question 1H for green spaces to have management arrangements in place, we must be able to design SUDs so that they can be fully vested too.

Green and blue infrastructure can be difficult to deliver on smaller and brownfield sites and where there need to be trade-offs to achieve density requirements. It would be helpful if appropriately designed SUDS can be accounted for within open space requirements. Obviously for the change of use of existing buildings it may be impossible to provide green and blue infrastructure and this should be reflected in any policy.

**1C We want to identify areas that can be used for future water management to enable adaptation to climate change. Do you agree with this?**

Not Answered

**Explain why:**

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

**1D We want to clearly set out under what circumstances the development of poor quality or underused open space will be considered acceptable. Do you agree with this?**

Not Answered

**Explain why:**

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

**1E We want to introduce a new 'extra-large green space standard' which recognises that as we grow communities will need access to green spaces more than 5 hectares. Do you agree with this?**

Not Answered

**Explain why:**

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

**1F We want to identify specific sites for new allotments and food growing, both as part of new development sites and within open space in the urban area. Do you agree with this?**

Not Answered

**Explain why:**

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

**Upload (max size 3mb):**

No file was uploaded

**1G We want to identify space for additional cemetery provision, including the potential for green and woodland burials. Do you agree with this?**

No

**Explain why:**

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

**1H We want to revise our existing policies and green space designations to ensure that new green spaces have long term maintenance and management arrangements in place. Do you agree with this?**

Not Answered

**Explain why:**

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

**Choice 2 - Improving the quality and density of development****2A We want all development (including change of use), through design and access statements, to demonstrate how their design will incorporate measures to tackle and adapt to climate change, their future adaptability and measures to address accessibility for people with varying needs, age and mobility issues as a key part of their layouts.**

Not Answered

**Explain why:**

There is not enough information given to agree or disagree. It is important that the requirement "to demonstrate" is reasonable and proportionate. There are

already various policies and guidance that require such demonstration and it is not made clear what change is proposed. Care should be taken not to require onerous submission requirements to add to the already heavy and expensive burden of documentation to be submitted with a planning application.

**2B We want to revise our policies on density to ensure that we make best use of the limited space in our city and that sites are not under-developed. Do you agree with this?**

Not Answered

**Explain why:**

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

In our view, there should be flexibility for developers and designers to respond to the local context and the market for different types of housing. We therefore suggest the following wording for a new policy on density.

ALL NEW HOUSING SITES WILL BE EXPECTED TO BE DESIGNED TO ENSURE THE EFFICIENT USE OF LAND AND OPTIMISE HOUSING DENSITIES. THE APPROPRIATE DENSITY WILL DEPEND ON LOCAL CONTEXT. THE ACCESSIBILITY OF THE SITE TO PUBLIC TRANSPORT AND OTHER RELEVANT SERVICES, AND THE NEED TO ENCOURAGE AND SUPPORT THE PROVISION OF LOCAL FACILITIES NECESSARY TO HIGH QUALITY URBAN LIVING WILL SUPPORT INCREASED DENSITIES SUBJECT TO SITE SPECIFIC CONSIDERATIONS. THIS SHOULD BE ACHIEVED BY USING A FULL RANGE OF HOUSE TYPES AND SIZES.

**2C We want to revise our design and layout policies to achieve ensure their layouts deliver active travel and connectivity links. Do you agree with this?**

Not Answered

**Explain why:**

We support active travel and achieving good connectivity, and it appears to us that existing policies and guidance already achieve this. It is not explained what the proposed revisions will entail and so there is not enough information given to agree or disagree.

**2D We want all development, including student housing, to deliver quality open space and public realm, useable for a range of activities, including drying space, without losing densities. Do you agree with this?**

Not Answered

**Explain why:**

**Choice 3 - Delivering carbon neutral buildings**

**2A 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?**

Not Answered

**Explain why:**

It is important that measures to reduce Carbon are brought in safely, efficiently and in the knowledge that they will make a real and lasting reduction to carbon emissions.

The Platinum standard of the build regulations is currently incomplete (i.e. the text under the sub headings in the current document is 'not currently defined' for all sections except CO2 emissions), therefore it is not known what the rest of the standard will require. This is critical when looking at the overall design, functionality and efficiency of buildings. It is therefore very difficult to quantify the impact that the Platinum standard will have on the design, build program and cost of buildings. Moreover, it is not clear whether the required the supply chain and expertise to implement any additional measures is available.

The Government has responsibility for amending building regulations to ensure future sustainability. In our view it is critical that LDP policies should align with these, otherwise there is a significant risk that different Councils will have differing requirements. Housebuilders and their supply chains would find it almost impossible to work in such an adhoc and piecemeal policy context. We are firm in the view that emissions standards for new buildings should continue to sit within the building standards regulatory regime.

**Choice 4 - Creating Place Briefs and supporting the use of Local Place Plans in our communities**

**4A 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

**Explain why:**

See Q4B

**4B We want to support Local Place Plans being prepared by our communities. City Plan 2030 will set out how Local Place Plans can help us achieve great places and support community ambitions.**

**How should the Council work with local communities to prepare Local Place Plans?:**

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

**Choice 5 - Delivering community infrastructure**

**5A We want City Plan 2030 to direct development to where there is existing infrastructure capacity, including education, healthcare and sustainable transport, or where potential new infrastructure will be accommodated and deliverable within the plan period. Do you agree with this?**

Not Answered

**Explain why:**

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

**5B We want City Plan 2030 to set out where new community facilities are needed, and that these must be well connected to active travel routes and in locations with high accessibility to good sustainable public transport services. Do you agree with this?**

Not Answered

**Explain why:**

There is not enough information given to agree or disagree. We are concerned that the methodologies for assessing the need for facilities and infrastructure may be flawed. We have provided further comments on specific points under Q12B.

**5C We want to reflect the desire to co-locate our community services close to the communities they serve, supporting a high walk-in population and reducing the need to travel. Do you agree with this?**

Not Answered

**Explain why:**

This is of course agreeable in principle, but there is not enough information given to agree or disagree. In response to Q12B we have indicated where we believe there are some incorrect accessibility conclusions in the Housing Study Site Assessment.

**5D.1 We want to set out in the plan where development will be expected to contribute toward new or expanded community infrastructure. Do you agree with this?**

Not Answered

**Explain why:**

There is not enough information given to agree or disagree and it is not made clear if this will be any different to current policies. The requirement for any infrastructure must be properly justified and in accordance with the Government Circular.

**5D.2 We want to use cumulative contribution zones to determine infrastructure actions, costs and delivery mechanisms. Do you agree with this?**

Not Answered

**Explain why:**

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

**5E We want to stop using supplementary guidance and set out guidance for developer contributions within the plan, Action Programme and in non-statutory guidance. Do you agree with this?**

No

**Explain why:**

We agree that statutory supplementary guidance should no longer be used, which is in any case the position in the new Planning Act. In our view, it is crucial that all matters, including developer contributions, that have a significant implication for the viability and delivery of housing are included within the LDP and not within

Action Programmes or non-statutory guidance. This approach allows for appropriate consultation and independent scrutiny, which must be the case for such important matters.

## **Choice 6 - Creating places for people, not cars**

**6A We want to create a new policy that assesses development against its ability to meet our targets for public transport usage and walking and cycling. These targets will vary according to the current or planned public transport services and high-quality active travel routes. Do you agree with this?**

Not Answered

### **Explain why:**

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

**6B We want to use Place Briefs to set the targets for trips by walking, cycling and public transport based on current and planned transit interventions. This will determine appropriate parking levels to support high use of public transport. Do you agree with this?**

Not Answered

### **Explain why:**

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

## **Choice 7 - Supporting the reduction in car use in Edinburgh**

**7A We want to determine parking levels in development based on targets for trips by walking, cycling and public transport. These targets could be set by area, development type, or both and will be supported by other measures to control on-street parking. Do you agree with this?**

Not Answered

### **Explain why:**

There is not enough information to agree or disagree. It fundamentally depends on how much parking is going to be made available.

**7B We want to protect against the development of additional car parking in the city centre to support the delivery of the Council's city centre transformation programme. Do you agree with this?**

Not Answered

### **Explain why:**

**7C We want to update our parking policies to control demand and to support parking for bikes, those with disabilities and electric vehicles via charging infrastructure. Do you agree with this?**

Not Answered

### **Explain why:**

There is not enough information to agree or disagree.

**7D We want to support the city's park and ride infrastructure by safeguarding sites for new park and ride and extensions, including any other sites that are identified in the City Mobility Plan or its action plan. Do you agree with this?**

Not Answered

### **Explain why:**

There is not enough information to agree or disagree.

## **Choice 8 - Delivering new walking and cycle routes**

**8A We want to update our policy on the Cycle and Footpath Network to provide criteria for identifying new routes. Do you agree with this?**

Not Answered

**Explain why:**

There is not enough information to agree or disagree.

**8B As part of the City Centre Transformation and other Council and partner projects to improve strategic walking and cycling links around the city, we want to add the following routes (along with our existing safeguards) to our network as active travel proposals to ensure that they are delivered. Do you agree with this?**

Yes

**8C We want City Plan 2030 to safeguard and add any other strategic active travel links within any of the proposed options for allocated sites. We also want the City Plan 2030 to include any new strategic active travel links which may be identified in the forthcoming City Plan 2030 Transport Appraisal, the City Mobility Plan, or which are identified through this consultation. Do you agree with this?**

Not Answered

**Explain why:**

There is not enough information to agree or disagree.

**Upload new cycle routes:**

No file was uploaded

### **Choice 10 - Ensuring the better use of land**

**10A. We want to revise our policy on purpose-built student housing. We want to ensure that student housing is delivered at the right scale and in the right locations, helps create sustainable communities and looks after student's wellbeing. Do you agree with this?**

Not Answered

**Explain why:**

**10B We want to create a new policy framework which sets out a requirement for housing on all sites over a certain size coming forward for development. Do you agree with this?**

Not Answered

**Explain why:**

**10C 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?**

Not Answered

**Explain why:**

### **Choice 11 - Delivering more affordable homes**

**11A We want to amend our policy to increase the provision of affordable housing requirement from 25% to 35%. Do you agree with this approach?**

No

**Explain why:**

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

Notwithstanding this, the Kirkliston development will comply with whatever affordable housing policy is ultimately contained in the LDP.

**11B 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?**

No

**Explain why:**

We 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. Where a strict prescriptive approach to the proportion of different types is taken, this can have a negative impact on viability, delivery timescales and design.

### **Choice 12 - Building our new homes and infrastructure**

## 12A Which option do you support?

Not Answered

### Explain why you support that option, or why haven't chosen an option:

We do not support any of the options because none of them is likely to provide the context to deliver sufficient housing to meet Edinburgh's housing need and demand until 2032. However, we could support an alternative to Option 3 (Blended Approach), which allocates much more land for housing than currently proposed.

Our response to question 12A is structured to reflect the underlying methodology of establishing how much housing land is required to meet future requirements, following Scottish Planning Policy i.e.

1. Establish housing need and demand i.e. from HNDA 2
2. Establish the Housing Supply Target (HST) to properly reflect HNDA 2
3. Establish the Housing Land Requirement by adding 10 - 20% to the HST
4. Estimate the amount of housing that can be delivered from the Established Housing Land Supply
5. Allocate additional housing land to make up any shortfall between the Established Land Supply and the Housing Land Requirement.

Following this, we have undertaken a critique of Options 1, 2 & 3, and finally we propose an "Alternative Option 3"

### HOUSING NEED AND DEMAND IN EDINBURGH

Scottish Planning Policy (para 113) requires plans to be informed by a robust housing need and demand assessment (HNDA). HNDA 2 is the most recent assessment of need and demand in Edinburgh which has been agreed as robust and credible, and we therefore support its use as the basis for establishing the Housing Supply Target for CityPlan 2030. Moreover, in the context of current circumstances, we support the use of the Wealth Distribution Scenario.

HNDA 2 identifies the following need and demand in Edinburgh from 2019 - 2032 (taking account of house completions up to 2019):

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

Scottish Planning Policy (para 115) indicates that the Housing Supply Target should be reasonable, should "PROPERLY REFLECT" the estimate of housing demand, and should be supported by compelling evidence.

As explained below, none of the 3 options presented in the Choices document comes close to meeting the housing need and demand identified in the Wealth Distribution Scenario of HNDA 2. In our view, the approaches suggested are contrary to Scottish Planning Policy in that they do not "properly reflect" the HNDA estimate and are not supported by compelling evidence.

There is a reference in the Council's documentation to the other factors involved in setting the housing target, however, it is not explained in any detail why a downward adjustment from the HNDA output is justified having regard to the "wider economic, social and environmental factors, issues of capacity, resource and deliverability, and other important requirements such as the aims of National Parks" required by Scottish Planning Policy.

This is an important matter given the historic severe undersupply of housing and housing land in Edinburgh and requires further attention. It is not clear if the Council has considered in any detail how first housing need and demand could be met before deciding a reduced HST was necessary. In this regard the HSTs in Choices could be seen to have been set using a 'back to front' methodology. Recent LDP Examination decisions such as those at Falkirk and Stirling are instructive on this matter. The findings of the Falkirk Reporter are quoted below:

"I agree with representees that this is not an appropriate approach for the council to have adopted; diagram 1 on page 30 of SPP makes clear that the setting of the housing supply target comes before the identification of land, as does a fair reading of SPP paragraph 120." (Issue 2, para. 35)

"In my view it is illogical to take a supply-led approach to the setting of the housing land requirement. The housing land requirement is intended to be the driver for ensuring a sufficiently generous supply of land is available to meet the housing supply target. If the housing land requirement is derived from the identified supply, rather than the opposite way round, the housing land requirement cannot have directly informed decision-making over which sites ought to be allocated." (Issue, para. 71)

Edinburgh has not been in a position recently where it has even attempted to allocate sufficient land to meet its own housing need and demand in full. Instead, a significant proportion of its need and demand has been redistributed to other authorities. As we refer to below, there is no reference in Choices 2030 to meeting any of Edinburgh's housing need and demand elsewhere.

### HOUSING SUPPLY TARGET

The Choices document states that Edinburgh's housing target 2019 to 2032 is:

- Market Housing - 22,600
- Affordable Housing - 20,800
- Total - 43,400

THIS COMPARES WITH THE HNDA 2 TOTAL NEED AND DEMAND OF 67,174 HOMES, WHICH IS A SHORTFALL OF 23,774 HOMES. IN OTHER WORDS, CHOICES 2030 IS PROPOSING TO MEET ONLY 65% OF THE NEED AND DEMAND.

THE MAIN REASON FOR THIS IS THAT COUNCIL CONSIDER THAT THE 23,786 AFFORDABLE HOMES CANNOT BE PROVIDED FOR. THE DECISION TO THEREFORE IGNORE THIS MASSIVE SHORTFALL IN MEETING THE NEED FOR AFFORDABLE HOUSING IS NOT PROPERLY JUSTIFIED, DOES NOT PROPERLY REFLECT THE HNDA AND, IN OUR VIEW, IS DEEPLY FLAWED.

To undersupply housing land in Edinburgh by nearly one third of requirements is likely to have a very significant impact on the housing market over the coming years. The Council acknowledges the current significant shortfall of affordable housing and the proposed strategy can only serve to massively exacerbate the problem. Given that Scottish Planning Policy for delivering more affordable housing hinges on a proportion of market sites being given over to affordable housing, an obvious alternative is to increase housing land release overall, which can accommodate market and affordable homes. If the Council does not intend to distribute any of its housing need and demand to neighbouring Council areas, as has been traditionally the case, then it should aim to have a strategy which meets need and demand within its own boundaries, or at least adopt a strategy that "properly reflects" the HNDA as required by Scottish Planning Policy.

We understand the Council's case for not adopting such a strategy, which is that there is doubt, based on historic completions rates, that the amount of housing actually required can be delivered. This, in our view, is not a reason to suppress the HST. This is because if the HST is suppressed to reflect historic completion rates rather than actual demand, it will mean that there is insufficient land allocated for the market to respond to that demand. In other words, the suppressed HST dictates and constrains delivery.

IN OUR VIEW, THEREFORE, CITYPLAN SHOULD SET AN ALL TENURE HOUSING SUPPLY TARGET IN LINE WITH THE HNDA 2 WEALTH DISTRIBUTION SCENARIO I.E. 67,174 HOMES.

Moreover, the precise splits between tenures are sensitive to minor changes in variables. The variables can change significantly over time. We therefore consider that the all tenure output of the HNDA should be the primary piece of information which informs the HST. This approach was endorsed by the Reporter at the recent Falkirk LDP Examination (DPEA ref. LDP-240-2), as follows:

"I do however acknowledge that needs and demands for different tenures are likely to vary over the course of the plan period. Therefore I reiterate that it is the overall, all tenure housing supply target against which the number of completions and availability of effective land should ultimately be tested, regardless of tenure." (Issue 2, para. 66)

#### EXISTING (ESTABLISHED) HOUSING SUPPLY

The existing housing supply is made up of two components – effective and constrained sites. Although we agree that sites which are identified as effective in the 2019 Housing Land Audit should be taken into account, we question the number of units which is assumed will be delivered by 2032. This is because the Council appears to have assumed that all effective sites will be developed in their entirety by 2032, when in reality the rate of delivery on some larger sites will mean that the development is unlikely to be completed by that date. Homes for Scotland have assessed this matter in detail in their submission to Choices 2030, and have calculated that 21,055 dwellings rather than the 22,696 identified in the Council's Housing Land Study are likely to come forward. The calculation that HfS have undertaken is robust, based on projecting forward the programming shown in the 2019 HLA for the first 7 years of development. This approach has recently been supported by the Report of Examination on the Aberdeen City & Shire Strategic Development Plan, as follows:

"The approach used by Homes for Scotland where the programming of sites is extrapolated beyond the period stated in the housing land audit is well-evidenced with tables showing each site in each authority and market housing area. There will be instances where sites perform better and some which deliver less than the extrapolated method shows but it reasonably carries forward the last known (and agreed) programme of delivery on each site into the future. Therefore, I consider that it can be effectively used to predict the amount of the established supply that is considered to become effective during the periods 2027 to 2032 and 2033 to 2040." (para. 26, p. 193, Issue 14)

The Housing Land Study identifies the future delivery of 7,468 houses on constrained sites. This is a highly optimistic assumption given that constrained sites by their nature have impediments to overcome and no identified solution. In some cases we accept that these constraints may be overcome. However, equally sites which are currently considered effective may become constrained over time. Therefore, in our view, only currently effective sites should be relied upon to contribute to the land supply and this approach was also endorsed in the Report of Examination for the Aberdeen City and Shire SDP.

THUS, AGAINST THE COUNCIL'S ASSUMPTION THAT THE EXISTING HOUSING LAND SUPPLY WILL DELIVER 30,164 UNITS, WE ARE OF THE VIEW THAT THIS SHOULD BE ASSUMED TO BE 21,055 UNITS.

#### ESTABLISHING THE HOUSING LAND REQUIREMENT

Scottish Planning Policy (para 115) requires plans to allocate 10 – 20% more homes than the Housing Supply Target figure to provide generosity and flexibility. The Choices document proposes the lowest level of generosity at 10%. We support this approach but only on the basis that no delivery is assumed from constrained sites as described above and also that a more realistic approach is taken to delivery assumptions from the 142 'new' brownfield sites described in the Housing Study (see below). The Council's delivery assumptions are highly speculative and optimistic in our view and even if generosity was pegged at 20% it would be too little to account for the risk of the supposed supply not delivering.

SO THERE IS A BALANCE TO BE STRUCK BETWEEN THE RELATIVE RISK OF THE ESTABLISHED HOUSING LAND SUPPLY NOT DELIVERING AS PREDICTED AND THE %AGE GENEROSITY. IN THE CONTEXT OF THE ASSUMPTIONS MADE IN CHOICES 2030, IT SHOULD BE SET AT 20% AT LEAST.

HOWEVER, IN THE FOLLOWING SECTION WE HAVE USED A FIGURE OF 10%, ON THE BASIS THAT MORE REALISTIC DELIVERY ASSUMPTIONS FOR CONSTRAINED AND NEW BROWNFIELD SITES WILL BE USED.

#### NEW LAND REQUIREMENT

Following on from the above considerations, it is reasonably straight forward to calculate the number of new homes for which new land needs to be allocated in CityPlan.

Housing Need & Demand 2019 – 2032: 67,174 units  
Housing Supply Target: 67,174 units  
Housing Land Requirement (HST + 10%) 73,892 units

Effective Housing Supply: 21,055 units  
New Land Requirement: 52,837 units

## CRITIQUE OF OPTIONS 1, 2 AND 3 IN CHOICES 2030

### OPTION 1

Option 1 proposes to deliver 17,600 houses in the plan period on land within the urban area through rapid intervention by the Council and its public sector partners. If landowners do not bring forward the identified sites for development the Council proposes compulsory purchase.

As explained in the Housing Land Study, 142 brownfield sites have been identified which are stated to have medium to high potential for housing. As we explain below there is not any evidence presented to indicate that this is in fact the case. Some of the sites may meet planning objectives e.g. proximity to public transport, but there is significant doubt regarding delivery.

Although we fully recognise and support the priority to bring forward brownfield land for development, unfortunately Option 1 has a number of fundamental problems which should rule it completely out of contention.

Firstly, the identified capacity of 17,600 is only about 33% of the number of additional new houses required to meet Edinburgh's need and demand.

Secondly, it is highly unlikely that the 142 identified sites will be developed in their entirety by 2032.

The deliverability of these sites has not been considered in the Housing Study. Important basic information about the sites is apparently unknown including whether the owner is interested in selling / developing the site and who owns them.

Just 6ha of land (capacity for 428 dwellings) is identified as suitable. A further 140ha is identified as being partially suitable for development (7,767 dwellings) and 127ha (8,406 dwellings) as unsuitable. Nevertheless, it has been assumed that all of these sites, whatever their classification will be delivered in full during the plan period, apparently disregarding the suitability review.

Of the 275ha of land just 11ha is vacant. The delivery of the land therefore assumes that the operation of existing businesses or public sector organisations will cease. For this to be the case residential development would need to create a land value in excess of the value of the premises in its current use and provide sufficient incentive for the landowner to sell. This has not been considered in the Housing Study and should not necessarily be assumed for the following reasons:

1. The change of use of industrial to residential will have a heavy cost burden, including significant developer contributions and often high abnormal land remediation costs. In many cases this may make residential development economically unviable.
2. The City Plan Industrial Property Market finds that industrial site vacancy rates are low in Edinburgh and rents are growing. This picture is similar in South East Scotland with Ryden's 85th Scottish Property Review noting that vacancies are at record low levels (p. 20). Moving location will be difficult for many operators and so they may well place a particularly high value on sites for owner-occupiers or outstanding lease periods for tenants. This will mean that asking prices for those that may be willing to sell could also reflect valuations of the operating companies as going concerns.

Many of these sites will have already been considered by private developers with the landowners approached. It is for the Council to explain how, despite having not come forward to date, they will be delivered for housing, despite the financial burdens of planning policy being increased, reducing the land value which could be offered by a prospective developer.

The lead in times for many of the sites, even if they are in single ownership and can be viably developed, will be lengthy. Existing leases would need to expire or be bought out, which would add to viability challenges. However, for many sites, there will be multiple ownerships, where conflicting interests will add to the difficulties.

Compulsory purchase is unlikely to be solution due the complexity, length, cost and uncertainty of the procedure. It is questionable whether CPO would be successful if seeking to acquire land occupied by active businesses with employees unless there were already other suitable premises in suitable locations available. One would also question the desire of the Council to even want to proceed in individual cases that involved forcing the closure of businesses and related loss of employment.

The time taken to go through the process should also not be underestimated. It will presumably be necessary to give the owners a chance to bring the site forward for development themselves. This could be a period of five years, but many sites may well have current leases lasting longer than this. It would then be necessary to make efforts to obtain the sites on the open market. A CPO may be able to be ran alongside this but the process would still take many years. For instance for the St James Centre, approaches were first made to owners in 2008 and has only been completed 12 years later.

The costs and logistics of running multiple contentious CPOs simultaneously will also likely be prohibitive.

Moreover, much of this land is currently in employment use, and the Choices document says intervention will be required to deliver 275 hectares of employment land. There is virtually nothing in the Choices document to explain how this provision of employment land will transition without resulting in significant economic upheaval and related negative impacts for employment and service delivery.

### OPTION 2

Option 2 proposes 27,900 homes on a number of large-scale greenfield sites around the City. Although we support the release of these sites, there are a number of flaws in this strategy.

Firstly, the number of homes proposed is only just over half of the additional new homes required to meet housing need and demand in full.

Secondly, it is unlikely that the number of houses proposed can be delivered on these sites by 2032. There are about 10 ownership interests involved and a rough calculation would suggest that each of these might deliver in the region of 200 homes per year once started. Given the strategic nature of these sites and the lengthy planning and related consenting process it is realistic to assume that development is unlikely to begin until 2025 at the earliest. An realistic assumption might be that each site will therefore deliver 200 houses/year for a 7-year period up to 2032, producing a total of approximately 14,000 houses, which is significantly below the ambition of 27,900.

It is therefore clear that significant additional new sites are required, simply to get closer to meeting full housing need and demand.

### OPTION 3

Option 3 is described as the blended approach, focussing on greenfield and brownfield land. However, it too has fundamental shortcomings.

Firstly, it only proposes 17,600 houses in total, the same as Option 1, which as explained above is only a fraction of what is required to meet Edinburgh's housing need and demand.

Secondly, although it assumes 11,000 houses are built on the 142 urban brownfield sites identified rather than 17,600 in Option 1, in our view this continues to be a very significant over-estimate of what can be achieved for the reasons we have explained under Option 1.

Also, the proposal for 6,600 houses on greenfield sites significantly under-utilises the delivery potential on sustainable sites around Edinburgh.

### ALTERNATIVE OPTION 3

We agree that a 'blended approach' of greenfield and brownfield land release for housing is appropriate but it should seek to deliver significantly more homes than is likely to arise from Option 3.

If Edinburgh's housing need and demand is to be met in full then that would mean that new land for 52,837 homes would need to be identified. However, we accept that it is not a realistic proposition that this number of houses (minus 10% generosity) could be delivered in the plan period in addition to the effective housing land supply.

It is notable that the Choices document does not envisage that at least some of the very large proposed shortfalls in meeting Edinburgh's housing need and demand in full should be accommodated elsewhere in the City Region. This is the approach that has been the cornerstone of strategic planning for housing in the Region for many decades, and its abandonment now has significant consequences for the City. To simply ignore the unmet housing need and demand that would inevitably arise from any of the 3 Options proposed in the Choices document is not, in our view, a reasonable or acceptable approach. Nor does it comply with Scottish Planning Policy or Government aspirations for the delivery of housing to reflect need and demand.

We therefore propose an Alternative Option 3. As described below, this is more realistic in regard to the delivery of housing on brownfield land, but continues to be aspirational to ensure that its potential is maximised. Greenfield land has much greater potential than identified in Option 3.

In our view, a more reasonable and realistic assumption for delivery from new brownfield sites within the plan period is 6,000 homes. Even that will be a significant challenge given the issues we have noted above in respect to viability, lead-in times, CPO etc.

Option 2 of the Choices document indicates that 27,900 units can be delivered on the greenfield sites identified. However, because of lead-in times for development and the limit to the rate of development on individual sites, it is inevitable that additional greenfield sites will need to be identified to achieve this total within the plan period.

## 12B Do you support or object to any of the proposed greenfield areas? (Please tick all that apply)

### Support Greenfield - Support:

Kirkliston

### Support Greenfield - Object:

### Explain why:

Taylor Wimpey and Barratt Homes support the proposed development allocation at Kirkliston. JTP have prepared a Vision Document for the land controlled by Taylor Wimpey and Barratt, which is submitted in response to Q12C. An indicative layout for the site is also submitted. The land controlled by TW/Barratt comprises 37 hectares north of Burnshot Road and forms a significant and central component to the development allocation proposed in Choices 2030. It is adjacent to other land being promoted for development which together comprise the overall site. This includes Hopetoun Estate land to the north of the railway line and the Miller Homes promoted land to the east and south of our site.

We can confirm that whilst we consider that the TW/Barratt land provides a standalone opportunity for a comprehensive and sustainable community expansion, TW/Barratt are happy to work collaboratively with other landowners for a wider proposal. The Vision Document provides a more detailed assessment of the opportunity for the development of the TW/Barratt land, but its key benefits can be summarised as follows:

- Land within the site can be made available for an Education Campus, including secondary, primary and nursery schools of a size to be agreed with the Council. The Vision Document shows a potential location and layout, subject to further discussion.
- The provision of approximately 600 homes, depending on the density of development. JTP have considered a possible layout for the site, taking account of technical opportunities and constraints, landscape capacity and the existing character of Kirkliston. There are proposed zones of high, medium and low density housing, which take account of the Council's aspiration to achieve a minimum of 65 dwellings/hectare. TW/Barratt are happy to discuss these proposals further with the Council. Ultimately, TW/Barratt will bring forward proposals for the site which comply with the replacement LDP's adopted policies.
- The creation of a place that helps us live healthily and in harmony with the landscape; a place which caters for all stages of life – from starter family homes to downsizer homes; a place that appeals to flexible ways of living; and a place that creates community through built-in opportunities.
- Providing good proximity to services and public transport.
- Providing plentiful green open spaces.
- The creation of a place where it is a pleasure to walk or cycle, or for children to play on the street, or for people to bump into neighbours and stop for a chat.
- An opportunity for imaginative interventions related to electric vehicle charging provision and city car club usage.
- The development will make a significant contribution to the local economy, and also to the provision of community facilities and social infrastructure for the benefit of all.
- Within the proposed development we will take design inspiration from historic local settlements such as South Queensferry, Linlithgow and Kirkliston itself. Ther

masterplan will be comprised of different character areas and spaces which will make Almondhill a rich and beautiful place to live. In doing so, our aim is to create an exemplary settlement expansion for Kirkliston, which will contribute positively to the existing settlement and the local landscape setting.

There are no technical constraints associated with the site which would prevent its development and the site can be drained for foul and surface water. A High Pressure Gas Pipeline runs across the site and will be accommodated within the proposed masterplan. Connection to utility providers is available with water, gas, telecoms and electrical supplies located either within or in the immediate vicinity of the site.

The TW/Barratt site is largely covered by the Craigbrae Site Assessment contained in the Choices 2030 Housing Study. We have taken the opportunity to ask our expert team to review this Assessment and provide comments on the conclusions below. We trust that these comments will be taken into account in the further consideration of the site's allocation in the LDP.

We have listed below each of the Assessment criteria and conclusions for the Craigbrae area, and provide our comments in capital letters:

Does the site fit within an area identified as a strategic development area?

No – The site is not within an identified SDA

COMMENT: THIS IS CORRECT BUT SESPLAN 1 POLICY 7 DOES SUPPORT THE ALLOCATION OF SITES IN THE LDP WHICH ARE OUTWITH AN SDA ON THE FOLLOWING CONDITIONS:

- A. THE DEVELOPMENT WILL BE IN KEEPING WITH THE CHARACTER OF THE SETTLEMENT AND LOCAL AREA;
- B. THE DEVELOPMENT WILL NOT UNDERMINE GREEN BELT OBJECTIVES; AND
- C. ANY ADDITIONAL INFRASTRUCTURE REQUIRED AS A RESULT OF THE DEVELOPMENT IS EITHER COMMITTED OR TO BE FUNDED BY THE DEVELOPER

AS EXPLAINED IN COMMENTS BELOW, ALL OF THESE CONDITIONS CAN BE MET.

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

Partially – The site is within walking distance of local convenience centres but access is impeded by the lack of pavement along the main road leading to the shop.

COMMENT: ALTHOUGH THERE IS CURRENTLY NO CONTINUOUS FOOTWAY ON BURNSHOT ROAD BACK TO KIRKLISTON, BDW AND TW CONTROL THE LAND TO THE SOUTH OF BURNSHOT ROAD WHICH COULD BE USED TO PROVIDE A CONTINUOUS FOOTPATH. CONNECTIONS FROM THE SITE TO THE EXISTING SEGREGATED RAILWAY FOOTPATH CAN ALSO BE MADE FROM THE SITE THROUGH THIS LAND TO THE SOUTH OF BURNSHOT ROAD. THERE IS A FOOTPATH AVAILABLE VIA HOUSEFIELD DRIVE LEADING BACK TO QUEENSFERRY ROAD AND HENCE THE CENTRE OF THE TOWN. THE PROPOSALS FOR THE SITE ALSO INCLUDE NEIGHBOURHOOD SHOPPING WITHIN THE SITE WHICH WILL BE EASILY REACHED ON FOOT.

Does the site have access to the wider cycle network?

No – The site does not have access to the wider cycle network and access is unlikely to be improved as no suitable potential cycle route interventions have been identified which could serve the site. Upgrade of the adjacent railway path could change this but is not committed.

COMMENT: THE ADJACENT RAILWAY PATH IS IDENTIFIED ON QUIET ROUTES MAPPING AS AN 'OTHER PATH' AND IS INCLUDED AS A FUTURE PATH IN THE ATAP REFRESH (MAP ON PAGE 21). WHILST IT IS NOT COMMITTED, DEVELOPMENT COULD BE ANTICIPATED TO ASSIST IN ITS PROVISION.

Can the site support active travel overall through appropriate intervention?

No – The site would not support active travel overall, as the site is not within walking distance of employment clusters and these are unlikely to be provided through development due to lack of scope for development nearby. Access to the wider cycle network is poor and it is unlikely to be improved through an identified intervention, though there may be scope to..... (unfortunately the remaining text is missing from the Housing Study)

COMMENT: CONTRARY TO THE COMMENTS IN THE STUDY, FOOTPATHS DO EXIST TO CONNECT THE SITE WITH KIRKLISTON AND THE CYCLE NETWORK COULD BE IMPROVED AND EXPANDED AS A RESULT OF DEVELOPMENT OF THE SITE. THIS WOULD ALSO AFFORD NOT ONLY A CHANCE TO UPGRADE THE RAILWAY PATH TO THE SOUTH, BUT TO PROVIDE A CONNECTION TO THE NORTH-WEST WHERE AN EXISTING CYCLE PATH ON THE B800 CAN ALSO BE REACHED. THE ATAP REFRESH STUDY STATES "ON THE QUIET ROUTES NETWORK, COHERENCE IS OF THE UTMOST IMPORTANCE. A SINGLE 'MISSING LINK' CAN SERIOUSLY UNDERMINE THE EFFECTIVENESS OF A ROUTE OR THE ENTIRE NETWORK." DEVELOPING HERE CAN PLUG SOME CYCLE ROUTE GAPS.

IT IS WORTH NOTING THAT PROVIDING A NEW SECONDARY SCHOOL IN KIRKLISTON WILL MAKE IT A LOT EASIER AND SAFER FOR PUPILS TO WALK AND CYCLE TO SCHOOL AND REDUCE THE NEED FOR CAR TRIPS TO SOUTH QUEENSFERRY.

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

No – The site does not support travel by public transport based on existing or incrementally improved provision.

COMMENT: EXISTING PUBLIC TRANSPORT ACCESSIBILITY IS COMPROMISED BY THE FACT THE SITE IS NOT YET DEVELOPED. PUBLIC TRANSPORT SERVICES EXIST NEARBY IN KIRKLISTON, DIVERSION ROUTES CAN BE PROVIDED AND THE QUANTUM OF DEVELOPMENT WOULD HELP SUPPORT PUBLIC TRANSPORT SERVICES FOR NEW AND EXISTING USERS.

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

No – The site does not support travel by public transport based on existing or incrementally improved provision.

COMMENT – DIVERSION OPPORTUNITIES FOR PUBLIC TRANSPORT SERVICES EXIST AS A CONSEQUENCE OF DEVELOPMENT OF THE SITE. PARK AND RIDE PROVISION BEING DEVELOPED AS PART OF THE WINCHBURGH MASTERPLAN. THERE IS ALSO POTENTIAL TO CONSIDER A RAIL HALT TO THE NORTH OF THE SITE. HOPETOUN ESTATES HAVE CONFIRMED THE AVAILABILITY OF LAND FOR THIS SHOULD IT BE A COUNCIL ASPIRATION.

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

No – The site does not have sufficient primary school infrastructure capacity.

COMMENT: SEE BELOW

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

No – The site does not have sufficient secondary school infrastructure capacity.

COMMENT: SEE BELOW

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

Partially – The site does not have sufficient community infrastructure capacity to support development and no appropriate intervention has been identified to address this. A new primary school would be required. A new secondary school would be required. The Council's preference is to deliver new secondary schools with a capacity for 1200 pupils. If a new 1200 secondary school was delivered it could accommodate pupils from Kirkliston but also support a significant amount of additional housing development. Good active travel and transport links would be important. The level of development proposed here would require at least a new primary and a new secondary school which would also serve the existing population of Kirkliston which does not yet have a secondary school.

COMMENT: THE TW & BARRATT HOMES VISION DOCUMENT PROPOSES A SITE FOR A NEW EDUCATION CAMPUS, INCORPORATING EARLY YEARS, PRIMARY AND SECONDARY PROVISION AS WELL AS POTENTIAL FOR COMMUNITY USE AREA WHICH CAN BE DISCUSSED FURTHER WITH THE COUNCIL IN TERMS OF SIZE AND THE FACILITIES PROPOSED.

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

No – No scope is identified for development on this site due to the substantial extent any development would have to cover to take advantage of a change in landform to form a new robust settlement boundary and mostly lie at a substantial distance from the core of Kirkliston. This change in landform is a steep slope towards the north east of the site which may form a natural boundary if enough scope for development is found in this area.

COMMENT: AS SET OUT IN THE VISION DOCUMENT SUBMITTED IN RESPONSE TO Q12C, THE TW/BARRATT LAND CAN BE DEVELOPED IN A WAY THAT MAINTAINS THE IDENTITY, CHARACTER AND LANDSCAPING OF KIRKLISTON, AND WILL NOT RESULT IN COALESCENCE. A LANDSCAPE ASSESSMENT OF THE AREA HAS BEEN UNDERTAKEN; EXTRACTS OF WHICH INCLUDING A TOPOGRAPHICAL MAP AND A PLAN SHOWING THE OUTCOMES OF A ZONE OF THEORETICAL VISIBILITY EXERCISE HAVE BEEN INCLUDED IN THE LANDSCAPE SECTION OF THE BROCHURE. THE MASTERPLAN HAS BEEN DEVELOPED ACCORDING TO THE FINDINGS OF THIS ASSESSMENT, INCLUDING KEEPING DEVELOPMENT AWAY FROM THE MORE VISUALLY PROMINENT AREA TO THE NORTH WEST OF THE SITE.

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

Partially – The site may be considered of value for the strategic green network, due to lying within an area identified as a green network opportunity adjacent to Kirkliston and West Edinburgh.

COMMENT: SEE OUR COMMENT ON THE PREVIOUS CRITERION. ALSO, THE TW/BARRATT LAND CAN BE DEVELOPED IN A WAY THAT ENHANCES LINKAGES TO THE GREEN NETWORK. LANDSCAPING AND OPEN SPACE AREAS WILL BE PROVIDED ACROSS THE SITE, INTEGRATED WITH CYCLE AND FOOTPATH ROUTES, BOTH OF WHICH CAN CONNECT INTO SURROUNDING GREEN NETWORKS AND GREEN TRAVEL CORRIDORS.

Is the site suitable for development?

Yes The site is considered suitable for development, despite not being within the SESplan Strategic Development Areas as set out in its spatial strategy, poor accessibility and open landscape separate from the core of Kirkliston. The site should be considered as an urban extension of Kirkliston. Any development should have regard to improving Burnshot Road for active travel and public transport, upgrading the adjacent railway path as a suitable active travel route, the need for a new secondary school in Kirkliston and the lack of existing settlement boundary east of the existing urban area. Although public transport access remains poor and no intervention is identified to address this, measures to mitigate this through minor intervention should be investigated. As the site is not within the SESplan spatial strategy it should be considered as a reasonable alternative to other sites within the Strategic Development Areas. Development of the site will result in a new settlement boundary east of the existing village and opportunities to enhance screening by tree planting in relevant areas should be considered, either closer to the village above the route of a gas pipeline which must remain undeveloped, or further to the north east where a change in landform could form a new boundary. Accessibility improvements are required to enable development, and improvements to the railway path adjacent to the site to make it suitable as an active travel route should be delivered as well as improvements to Burnshot Road to improve walking and public transport. A strategy for improving public transport access to this area should be considered. As part of the development of a wider strategic green network, connections should be made to the adjacent railway path which could form a potential corridor forming part of the network. The level of development proposed here and in adjacent sites would require at least one new non-denominational primary school. There would be a partial requirement for one new roman catholic primary school, one new non-denominational secondary school and one new roman catholic secondary school to address growth here and citywide. These requirements should be co-ordinated through a brief for this and other sites identified in Kirkliston.

COMMENT – WE AGREE WITH MOST OF THE ABOVE COMMENTS. WE DO NOT AGREE WITH THE CONCLUSION THAT BECAUSE THE SITE IS NOT WITHIN THE SESPLAN 1 STRATEGIC DEVELOPMENT AREA IT SHOULD BE CONSIDERED AS A REASONABLE ALTERNATIVE TO THOSE SITES THAT ARE. THIS WAS NOT THE APPROACH TAKEN IN LDP1, WHICH ALLOCATED A NUMBER OF SITES OUTWITH THE SDA IN PREFERENCE TO SITES WITHIN THE SDA. EACH SITE SHOULD BE CONSIDERED ON ITS INDIVIDUAL MERITS REGARDING THE CRITERIA IDENTIFIED IN SESPLAN POLICY 7,

WHICH DOES NOT DISTINGUISH BETWEEN SITES WITHIN OR OUTWITH THE SDA IN TERMS OF ALLOCATION.

TW/BARRATT ARE KEEN TO WORK WITH THE COUNCIL TO DEVELOP PROPOSALS FOR THIS AREA, INCLUDING INCORPORATION OF CONNECTIONS INTO SURROUNDING CYCLE AND PEDESTRIAN ROUTES, LINKING INTO AND PROVIDING GREEN NETWORKS THROUGH THE SITE AND WORKING WITH THE COUNCIL TO DELIVER LAND FOR AN EDUCATION CAMPUS. BDW AND TW WOULD ALSO BE KEEN TO BE INVOLVED IN THE PREPARATION OF ANY PLACE BRIEF FOR THE AREA AND WOULD BE WILLING TO WORK CLOSELY WITH ANY OTHER LANDOWNERS WHOSE LAND IS ALLOCATED FOR DEVELOPMENT IN THE AREA.

IN ADDITION WE NOTE THAT THE SITE IS WITHIN THE WEST EDINBURGH AREA OF SEARCH WHERE THE COUNCIL CONSIDERS THAT THERE IS POTENTIAL FOR DEVELOPMENT IN THE CONTEXT OF TRANSPORT AND CITY DEAL FUNDING. THIS ADDS TO THE ARGUMENT THAT THE SITE SHOULD NOT BE CONSIDERED AS A 'REASONABLE ALTERNATIVE' TO SDA SITES.

TW/BARRATT SHOULD BE IDENTIFIED AS A KEY STAKEHOLDER WITHIN THE WEST EDINBURGH STUDY AREA, HOUSING BEING A DRIVER OF EMPLOYMENT AND SPENDING AS WELL PROVIDING INFRASTRUCTURE.

## **12C Do you have a greenfield site you wish us to consider in the proposed Plan?**

### **Greenfield file upload:**

Almondhill Kirkliston Full Masterplan.pdf was uploaded

### **Greenfield file upload:**

Almondhill Kirkliston Indicative Layout.pdf was uploaded

### **Greenfield file upload:**

No file was uploaded

## **12D Do you have a brownfield site you wish us to consider in the proposed Plan?**

### **Brownfield sites upload:**

No file was uploaded

## **Choice 13 - Supporting inclusive growth, innovation, universities, & culture**

**13A We want to create a new policy that provides support for social enterprises, start-ups, culture and tourism, innovation and learning, and the low carbon sector, where there is a contribution to good growth for Edinburgh. Do you agree with this?**

Not Answered

**Explain why:**

## **Choice 14 - Delivering West Edinburgh**

**14A We want City Plan 2030 to support the best use of existing public transport infrastructure in West Edinburgh and accommodate the development of a mix of uses to support inclusive, sustainable growth. We will do this through 'an area of search' which allows a wide consideration of future uses within West Edinburgh without being tied to individual sites. Do you support this approach?**

Yes

**Explain why:**

We agree that the LDP should take account of the West Edinburgh Study. Given the significance of the Kirkliston proposals in the context of West Edinburgh, it is important that Barratt and Taylor Wimpey are consulted as the Study progresses.

**14B We want to remove the safeguard in the existing plan for the Royal Highland Showground site to the south of the A8 at Norton Park and allocate the site for other uses. Do you agree with this approach?**

Not Answered

**Explain why:**

**14C We want City Plan 2030 to allocate the Airport's contingency runway, the "crosswinds runway" for the development of alternative uses next to the Edinburgh Gateway interchange. Do you agree with this approach?**

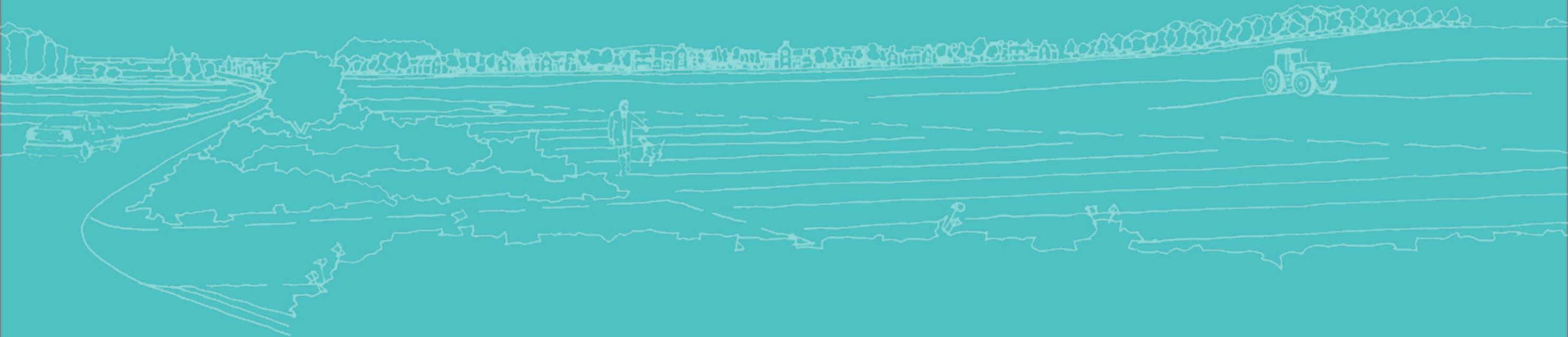
Not Answered

**Explain why:**



# Almondhill

• Kirkliston East •



**Vision Document**  
April 2020



DAVID WILSON HOMES  
WHERE QUALITY LIVES

Taylor  
Wimpey

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# The Opportunity

The purpose of this document is to provide a concise and engaging summary of our vision for Almondhill, setting out the essence of the site, the constraints and opportunities that have a bearing on its development and how our design has responded to these factors.

The document provides a detailed assessment of the opportunity for the development. It sets out our proposals for approximately 650 new private and affordable homes, land for an Education Campus, including secondary, primary and nursery schools, local neighbourhood shopping all set within a place that will achieve living healthily and in harmony with the landscape.

The site, which extends to approx 45.5 hectares, is controlled by Taylor Wimpey and Barratt. It is located to the east of Kirkliston, north of Burnshot Road. The site is greenfield in nature currently consisting of large scale arable fields set in a gently sloping landscape broadly falling north to south. The recently built housing off Housefield Drive bounds the site adjacent to the west; the railway line and M90 motorway to the north-east and Burnshot Road to the south.

The Taylor Wimpey and Barratt site forms a significant and central component to the development allocation proposed in The City of Edinburgh LDP Choices 2030. It is adjacent to other land being promoted for development which together comprise the overall site. This includes Hopetoun Estate land to the north of the railway line and the Miller Homes promoted land to the east and south of our site. We can confirm that whilst this submission presents and masterplans a standalone opportunity comprising the land within our control we would be happy to work collaboratively with other landowners for a wider proposal if this is the aspiration of the community and the Council.

Taylor Wimpey and Barratt are committed to the delivery of a high quality and successful place that creates a community our customers will feel proud of. A key driver for our vision is quality placemaking and from early investment with infrastructure, local amenities and through the delivery of high quality green open space networks with integrated active travel cycle and footway connections throughout, we aim to build a legacy development with its own identity where people really want to live.

At all times in the visioning and design of our proposals for Almondhill we will seek to embed the six key qualities of a successful place required by Scottish Planning Policy. We will use the Governments Place Standard tool to ensure we deliver a successful place, creating a good quality development which will enrich the lives of our customers and those who will live there.

## DELIVERING DENSITY AND ENHANCING LAND EFFICIENCY

Taylor Wimpey and Barratt acknowledge Edinburgh City Council's aspiration to ensure the efficient use of land by achieving enhanced density and coverage across development sites. While we would caution that challenges will inevitably lie ahead in achieving target density in harmony with the existing scale, character and settlement pattern of peripheral locations such as Kirkliston, we fully support the objective and will work with the Council to achieve this ambition.



osite

# Why Us?

## WHY TAYLOR WIMPEY?

Taylor Wimpey are one of the largest home builders in the UK, operating from 24 regional offices across Scotland, England and Wales and we have a particularly strong track-record of delivery within Edinburgh and the Lothians. We understand that development is about more than creating homes and we provide millions of pounds worth of infrastructure, for example roads, sewers, landscaping and community facilities, every year across the UK. We aim to develop vibrant communities with a true sense of place that fit into their surrounding area and meet the needs of local people.

We are a responsible community developer, committed to working with local people, community groups and local authorities and keeping them informed about our work, both before we build and throughout the life of the development. We focus on getting the basics of homebuilding right first time, such as quality, customer service and health and safety, and we aim to continually improve all parts of our business.

## WHY BARRATT?

Barratt is the UK's largest housebuilder, creating great new places to live throughout Britain. Our business is acquiring land, obtaining planning consents and building the highest quality homes in places people aspire to live. This is supported by our expertise in land, design, construction and sales and marketing. Our vision is to lead the future of housebuilding by putting customers at the heart of everything we do. We build the highest quality homes recognised by our HBF 5 Star customer rating, the only major housebuilder to have achieved this for the tenth consecutive year.

Our brands Barratt Homes and David Wilson offer a variety of properties. We build both private and affordable housing and in our last financial year delivered 17,579 new homes across the UK. Great design is at the heart of all our developments, which must meet the Building for Life 12 design standards. Our developments are planned to meet the needs of the local community, with the new homes we build ranging from 1 bedroom flats to 6 bedroom family homes.

# Why Almondhill?

We recognise the amazing potential that the Almondhill site possesses as a sustainable location for future housing development, park land and community woodland and mixed uses including potential local retail, community uses and a primary and secondary school. It is close to existing established neighbourhoods, facilities, transport corridors and other active travel routes. The site would form a natural expansion of the Kirkliston settlement and provide much needed housing and community facilities for the area.

Our masterplan and development strategies consider key factors including movement and connectivity, character, landscape, ecology and woodland, ground conditions and education. The Almondhill site forms a sustainable location for future housing, mixed use development and educational facilities close to the existing transport corridors and frequent bus services to employment opportunities and retail to the west of Edinburgh, such as Edinburgh Park and Hermiston Gait. Active travel is an important part of the plan and provision is made for pedestrians and cyclists.

Development of the site would provide around 650 new homes ranging from one to four-bedroom homes and apartments, mixed use facilities and schools. In addition to providing new homes, the development of Almondhill would have economic benefit in the form of new jobs and training and helping to sustain local shops and business. Other local benefits arise from the provision of open space, a proposed public square and provision of neighbourhood shopping. Depending on market conditions, housing completions are estimated at approximately 150 per annum over a 4 year period.

Preliminary studies have been undertaken of the site including; landscape, ecology, urban design and visual assessments, utilities, transport and access, together with assessment of drainage and flood mitigation. These appraisals have confirmed the suitability of the site for development.



**Almondhill, Kirkliston**

**Current site condition with new housing development visible in background.**



# Our Response



JTP have prepared a Concept Master Plan in support of the identification of this site for a mixed use development. The masterplan and community proposals are the result of an iterative process which commenced with a careful assessment of the constraints and opportunities which have a bearing on the site and the wider settlement of Kirkliston

The Concept Masterplan provides an indication of the potential for approx 650 homes, mixed uses, schools, a range of spaces and settings, including the role of landscape for unifying both new and existing green spaces.

More-over it provides a snapshot of the place that this development might become and the community it might foster;

- a place that helps us live healthily and in harmony with the landscape
- a place which caters for all stages of life – from starter family homes to downsizer homes
- a place that appeals to flexible ways of living
- a place that creates community through built-in opportunities



A landscape of rolling hills under a blue sky with a large, semi-transparent leaf graphic in the foreground. The text "understanding the context" is overlaid on the leaf graphic.

**understanding  
the context**

# Site Overview



Current site conditions



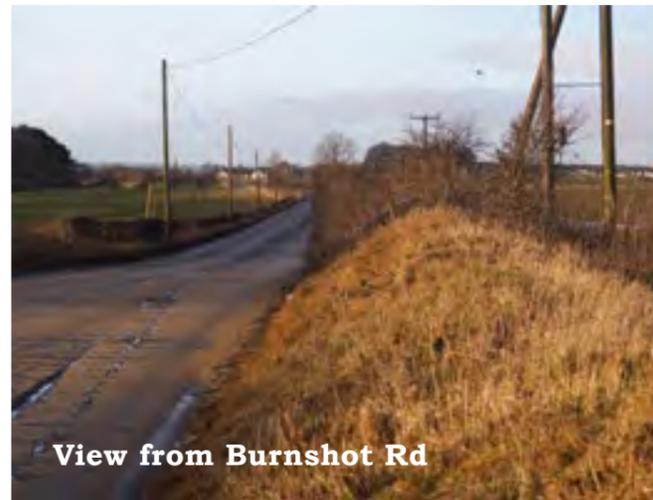
River Almond



Aerial View - new housing development visible in foreground



Current site conditions



View from Burnshot Rd



Current site conditions



Site at Almondhill



Panoramic of site - new housing development visible in background



Almondhill

# Site Overview

Fife

Forth  
Bridges

Queensferry



Firth of Forth

Edinburgh City Centre

Edinburgh Park

Hermiston Gait

M90

site

Edinburgh Airport

Kirkliston

M8

M9

Newbridge

To Glasgow

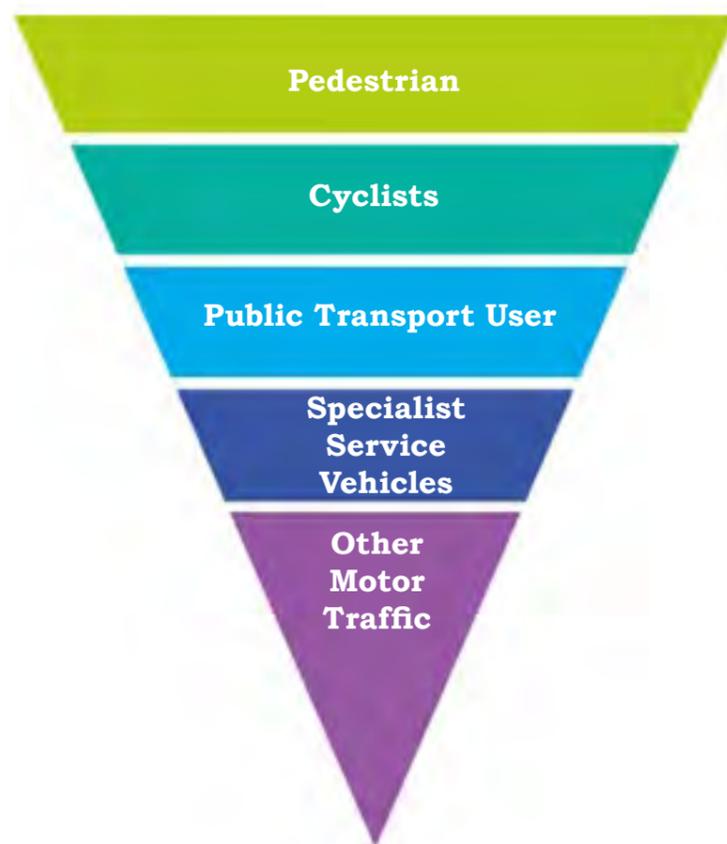


## Understanding the Context

# Transport and Accessibility

The Almondhill site forms a sustainable location for future housing, mixed use development and educational facilities close to the existing transport corridors and frequent bus services to employment opportunities and retail to the west of Edinburgh, such as Edinburgh Park and Hermiston Gait. Active travel is an important part of the plan and provision is prioritized for pedestrians and cyclists

National planning policy requires that accessibility be considered in a hierarchy as follows: - pedestrians, cyclists, public transport, private car.



The footpath along Burnshot Road would be continued along the frontage of the site and there is scope to widen the road to the north and south if required.

Bus services exist in the area and the development can be made permeable to these with service opportunities driven by increased development levels available.

Dalmeny station can be connected with for those on foot or cycle or travelling to use park and ride whilst Edinburgh Park station and Hermiston park and ride can be reached using a bus connection (service 63). Ingliston park and ride (and a tram interchange) can also be reached from the site and in future, Winchburgh station will also enable other travel options in the area (as would any new Winchburgh bus based park and ride), all aimed at forming part of multi modal journeys further afield for those choosing to travel outwith Kirkliston.

Ready vehicular access can be simply taken from the surrounding road network.

The development itself can be planned in such a way as to be permeable to all transport users with appropriate priority given to the hierarchy of modes.

## WALKING AND CYCLING

The proposals form an effective extension to the successful development at Almondhill / Kirkliston North. These areas are already home to a network of permeable footways, footpaths and cycle paths that would be extended to maintain linkages to and through the area. The core path that lies opposite to (south of) the site (CEC10) can, with some improvements, form a quality cycle link to Dalmeny station and the development can also achieve improved accessibility to the core path. A missing section of footway on Almondhill / Burnshot Road (in front of Almondhill House) may need to be dealt with but it is understood the applicants control the ground opposite. Furthermore, a current proposal to develop ground at Almondhill House would see provision of this missing section of footway made in any event.

Provision within the site of day to day facilities including education and community facilities would also mean that certain travel requirements would be self-contained.

The emerging Development Framework contains significant areas of publicly accessible open space which form a fundamental element of the overall development concept. Accessibility to these areas provides ready access to recreational opportunity.

City of Edinburgh Council local cycle mapping also illustrates CEC 10 and the mapping also shows that the cycle route on the west side of the B800 can also be connected with. This route has recently been upgraded as part of Queensferry Crossing works.

# Transport and Accessibility

## PUBLIC TRANSPORT

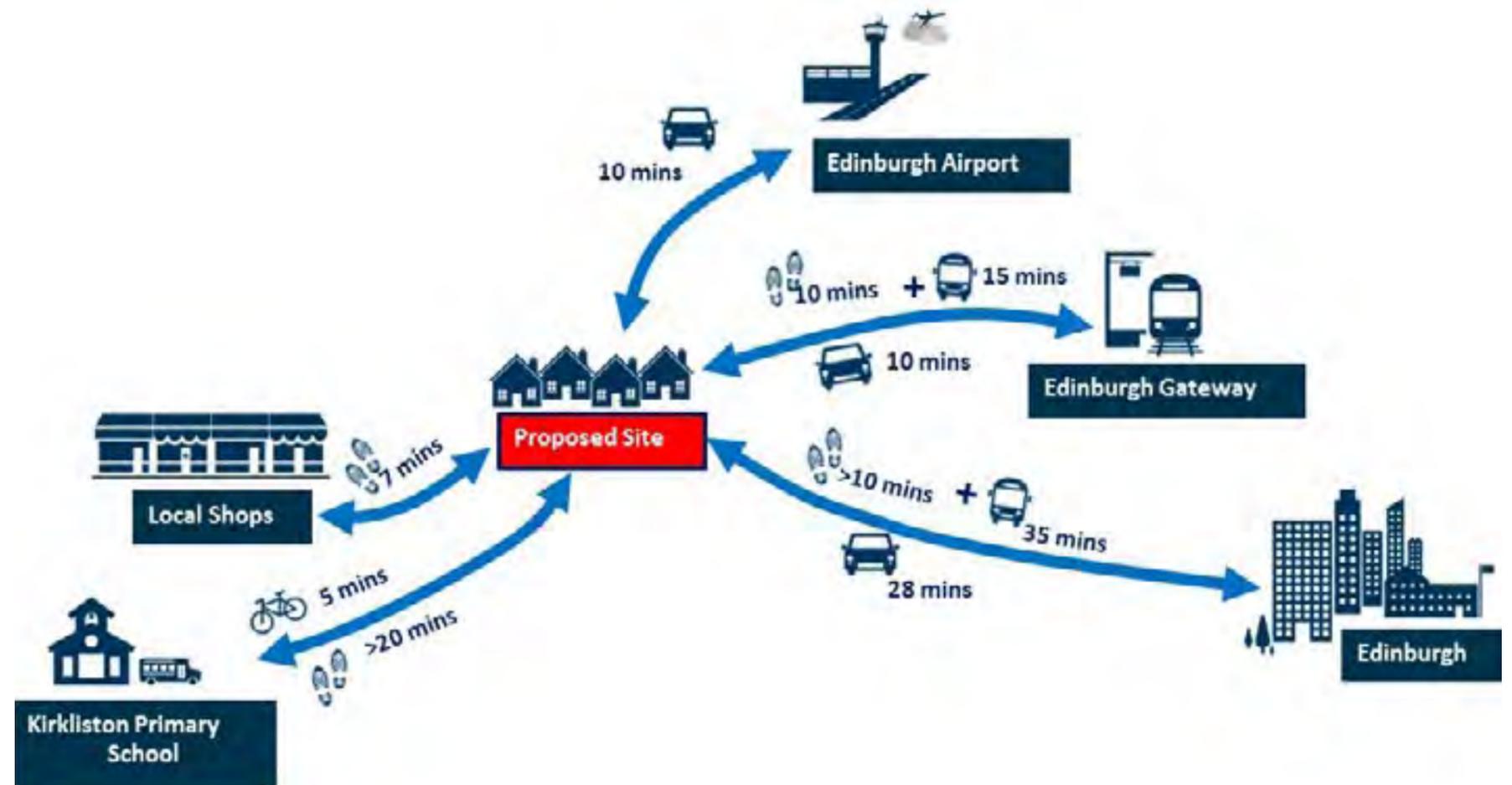
The existing development to the west of Queensferry Road is already provided with a bus gate to enable public transport services to operate through that area without private vehicle ‘rat running’ being created. The same treatment can be implemented within the new area to allow a wider public transport loop to be created. Queensferry Road is already home to several bus services in any event and direct path connections would allow access to these services from the site.

More generally, Kirkliston has seen service patterns for public transport change over the years and the new developments that have already occurred have led to a change in services, most notably from First.

Service 22A now provides a regular link between Kirkliston and Queensferry, Winchburgh, Livingston and other West Lothian towns whilst service 38 – Firsts flagship service – travels via Kirkliston on its way to central Edinburgh offering connections westwards with Linlithgow, Falkirk and Stirling.

Lothian service 63 also affords connections with Edinburgh Park station (and hence tram and heavy rail) together with Hermiston park and ride.

Provision of bus services in Kirkliston has responded to additional development and this current proposal can build on that provision helping sustain services for customers both new and existing whilst the development of the site layout can be carried out in such a way as to make the area bus accessible.



## Understanding the Context

# Transport and Accessibility

The B9080 (Burnshot Road) can carry a new access roundabout formed to announce arrival into Kirkliston when approaching from the east. This access point would enable a through public transport link connecting with Queensferry Road, though it is planned that the ability to drive a private vehicle on this alignment would be interrupted in such a way that a private vehicle 'rat run' is not created between Burnshot Road and Queensferry Road.

This approach is used in the existing development (both new build and the older, 70s, 'Allan Park' development) to the west of Queensferry Road. The B9080 can also carry a further access point(s) as can either a) extension of existing routes from Queensferry Road or b) the creation of a new Queensferry Road access located a short distance south of the M9 spur overbridge, the whole combining to provide a permeable development with the principles outlined in Designing Streets accounted for within the new area.

Off-site impacts are likely to occur at Kirkliston Crossroads (signal set) and on the A90. The signals have recently been retimed in a way that removes traffic capacity – this is understood to result from a safety concern caused by vehicle streams 'running together'. The signals are not understood to contain Microprocessor Optimised Vehicle Actuation, a system which can provide capacity benefits, and provision of this would be a straightforward retrofit.

A90 impacts would be shared with other sites that would be under development notably the large releases in South Queensferry (plus other development in Fife). Improvements at Barnton are already identified within the relevant Maybury / Barnton contribution zone.

Other interventions on the A90 corridor such as extension of the A90 bus priority scheme associated with the recently opened public transport crossing (using the Forth Road Bridge) are likely to lead to a shift in car usage on the A90 corridor in the future.

The 'Y' junction slightly west of the site where the B9080 (Almondhill / Burnshot Road) meets the old A9 (Foxhall Road) could be considered for a change in priority as the priority traffic flow is on the Kirkliston to Barnton movement, however, given the access gait of the proposals onto two adjacent roads, this may not prove to be necessary.

The development also presents an opportunity for imaginative interventions related to electric vehicle charging provision and city car club usage. The role that electric vehicles will have to play in this area is recognised and the promoters will monitor the position with power supply at the site to ensure EV charging is fully considered. Also, car club provision will form part of the travel package at this site.

All of the above points would be explored fully in the relevant Transport Assessment.



○ Burnshot  
Road

## Understanding the Context

# Site Conditions

A full technical review of the site has been carried out and we are satisfied that there are no major constraints associated with the site which would prevent its development. The Development Framework for the site has been prepared following this review and the masterplan considers and accommodates the sites technical constraints and opportunities.

### GEOLOGY

The geology on the site consists mainly of Drift and Solid ground with the majority of the drift element of the site being underlain by Till, Devensian – Diamicton, with some Lacustrine Deposits - Clay, Silt And Sand in the far north-eastern corner of the site, and isolated areas of Glaciofluvial Ice Contact Deposits - Gravel, Sand And Silt. The solid ground consists of sedimentary rock cycles has been reviewed on the BGS Geology of Britain viewer.

There are no known geological features or constraints that would impede development on the site.

### MINING & QUARRYING HISTORY

Although the site is situated within a Coalfield Consultation Area, very few mine-related features are evident within the site boundary or in the surrounding area. The only notable features are two coal outcrops, one which crosses through the centre of the site and another which enters the site from the north.

The site is not within a surface area that could be affected by past or present underground mining. However, reserves of coal exist in the local area which could be worked in the future.

No mine entries are situated within or in the vicinity of the site boundary. The nearest mine entry is noted on the interactive maps

as a mine shaft, more than 300m north-west of the site boundary, beyond the M90 motorway.

### GROUND CONDITIONS

The potential for ground stability hazards relating to the natural soil is considered to be low. Although the site is situated within a Coalfield Consultation Area, very few mine-related features are evident within the site boundary or in the surrounding area. No mine entries are known to be present onsite or within 250m of the site boundary.

An intrusive investigation will be required to confirm to evaluate the geotechnical composition of the underlying geology and Made Ground. If Made Ground is encountered in the south by the paraffin works and refuse heap and in the north by the former mast, the geotechnical composition of this material will need to be assessed for suitability.

Further investigation will be necessary to evaluate the geotechnical composition of the underlying geology and to confirm bedrock depth, particularly to inform foundation and drainage design.

### CONTAMINATION

The site has remained largely undeveloped over time and, as such, the risk of significant contamination issues across the site is considered to be low. Localised contamination and gas risk, associated with the historical railway land and historical paraffin works, cannot be ruled out and would be investigated in due course as well as any pesticides from arable farming uses. A complete Phase I Geo-environmental investigation will be carried out to supplement any future application.

## Understanding the Context

# Site Conditions

The site is in a lower probability Radon Area and therefore it will not be necessary to provide Radon protective measures in any new buildings or residential properties.

### UTILITIES

In terms of existing services, there is a high voltage overhead line along the southern boundary of the site, crossing a small portion of the site in the south-east corner at Burnshot Road. This could be considered to be diverted if it cannot be accommodated within the design of the site.

There are two high pressure gas mains within the site boundary running parallel and diagonally across the site north-west to south-east. An appropriate stand-off will be required to protect the line of these pipes. There are two decommissioned high pressure mains in the north portion of the site, running parallel east to west across the site, which will need to be considered in terms of options to remove/cap.

There is a 300mm diameter trunk water main running north to south in the northwest corner of the site that will allow good connection provision.

There are power, gas, water supply and telecom utilities within close proximity of the site boundaries. Utility providers will be contacted as early as possible in the process to establish network capacities and agree a plan for service delivery. No known constraints are evident at this time



Flood map (based on SEPA maps)

## Understanding the Context

# Site Conditions

### TOPOGRAPHY

The site consists of gentle undulations towards the back of the site and rises away from Burnshot Road. The existing gradients identified confirm that the site lends itself well to development without the requirement for significant earthworks or imported fill with gradients of around 1:20 on the northern half of the site and 1:40 on the southern half. As such, it is considered that the topography will be accommodated within the design proposals to ensure that sympathetic development takes place and landscape and visual impact is considered.

### DRAINAGE

There is no risk of river or coastal Flooding on the site as illustrated on the SEPA flood map. Surface water will be controlled through the Sustainable Urban Drainage System design which will be accommodated within the design of the site.

It is proposed that foul water is collected and discharged to existing foul sewer in Almondhill Road to the west of the site. A Pre Development Enquiry has been carried out and we have been in discussions with Scottish Water about the development of the site. Drainage and Water Impact Assessments will be carried out as required.

It is proposed that the surface water from the proposed development is collected, attenuated and discharged at greenfield run-off rate to the existing on-site ditch.

A surface water feature (possibly a drain) enters from the west of the site, flows west to east through the centre and then along the eastern field boundary, before turning south and 'sinking' beneath Burnshot Road. SEPA should be contacted as early as possible to

agree an acceptable solution for dealing with the on-site ditch. This open ditch could be left in place and avoided for development. Alternatively, it could be culverted or diverted to suit, although, SEPA generally discourage the culverting of watercourses for land gain, and as such, may object. A licence is required to control either culverting, or diverting watercourses.

### SITE OF IMPORTANCE FOR NATURE CONSERVATION (SINC)

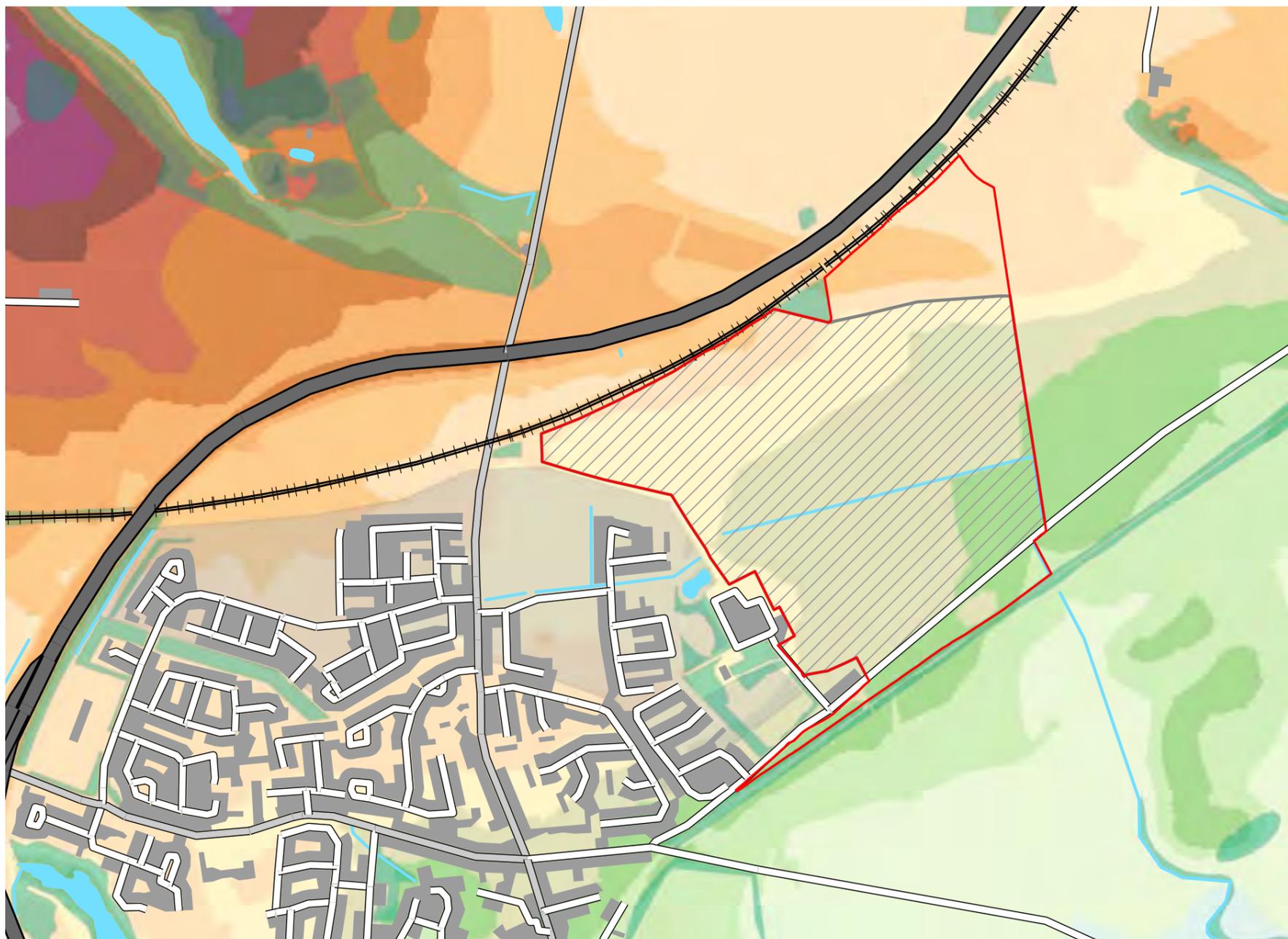
Being found within the site boundary to the south of the B9080, and which is proposed as being retained and protected. An option may be appropriate, subject to further analysis and consultation, to enhance the biodiversity of this area with the introduction of a wetland zone at the eastern end of the SINC.



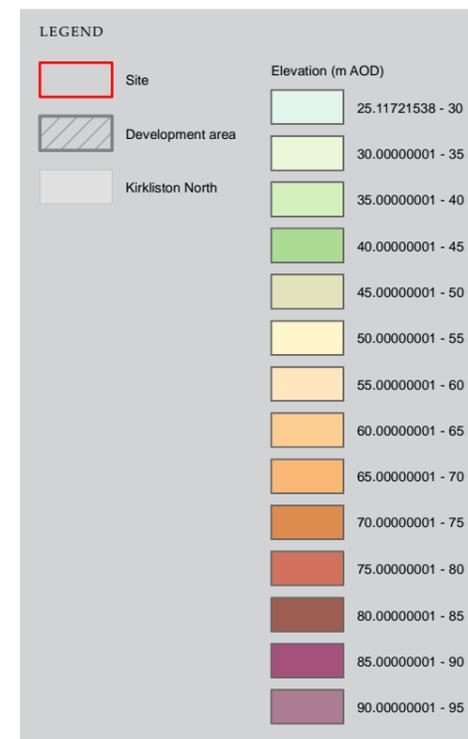
View along open ditch watercourse

# Understanding the Context

## Site Conditions



By keeping development within the hatched area, the built form fits within the same contained topographic setting as the rest of the village.



## Understanding the Context

# Landscape

Responses to previous proposals for development of this site have noted the potential visibility of development; changes to the character of the village, and the need to create a robust Green Belt boundary at the eastern edge of development on the site.

Studies have been undertaken to better understand these issues to enable a proposal to be brought forward which addresses these important matters.

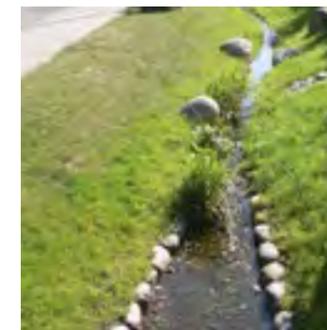
In relation to views, technical studies have focussed on identifying the extent of visibility; whether some parts of the site are more visible than others; and what views would look like. These have been aided by computer modelling to model both visibility and the appearance of the development.

The unique character of Kirkliston has also been considered; including how the village is situated within the surrounding landscape, and how it is approached and seen by people as they moved around the area.

The key question of the Green Belt boundary has been approached positively; treating this as an opportunity to design a finished edge to the village which both completes the settlement and provides an attractive welcome to residents and visitors.

These considerations have informed the initial masterplan development by:

- identifying areas which should not be developed in order to minimise visibility and maintain the character of Kirkliston;
- drawing on the influence of key landscape features such as the former river tributary running through the site and the linear woodland along the former railway; and placing emphasis on the importance of the eastern boundary design.



# Understanding the Context

## Landscape



### LEGEND

- Site
- Development area
- Distance from Site (1, 2, 3km)
- Buildings
- Woodland
- Visibility - main area of site (blue dots)
- Additional areas of visibility for northern area of site (pink dots)

By keeping development within the hatched area, visibility from Dundas Castle is reduced and the houses will not be visible from the B800 approaching Kirkliston from the north. The three primary approaches to the village (indicated by orange arrows), will not have views of the development. For drivers using Burnshot Road, the first view of Kirkliston will be from the same point as at present - where the road comes under the rail bridge and turns towards the village.

This computer generated Zone of Theoretical Visibility (ZTV) study indicates potential visibility if the whole site is developed (shown in blue and pink). Houses would only be seen from the areas shown in pink if the higher ground in the northern corner of the site is developed (beyond the grey hatched area).

Visibility from the south and east can be reduced by new planting to the south of Burnshot Road, continuing the linear woodland along the former railway line.





**a vision for  
Almondhill**

## a vision for Almondhill

# Placemaking

### PLACEMAKING

Our goal at Almondhill is to create a vibrant and dynamic new neighbourhood which continues Scotland's best urban design traditions, and which embeds a distinctive sense of place in a contemporary, sustainable form.

Within the proposed development we will take design inspiration from historic local settlements such as South Queensferry, Linlithgow and Kirkliston itself, and our masterplan will be comprised of different character areas and spaces which will make Almondhill a rich and beautiful place to live. In doing so, our aim is to create an exemplary settlement expansion for Kirkliston, which will contribute positively to the existing settlement and the local landscape setting.



Linlithgow



DESIGN PRINCIPLES

View of Kirkliston from the south



South Queensferry



South Queensferry High Street



# a Community with LIFE!

“We aim to create  
a vital new place,

in an outstanding setting, with great  
connections; a **place** that complements and  
integrates with

**the existing community at Kirkliston**

a place where people can **live, work and play**  
and a place where

**memories** are made and **roots** are set down”



## A Vision for Almondhill

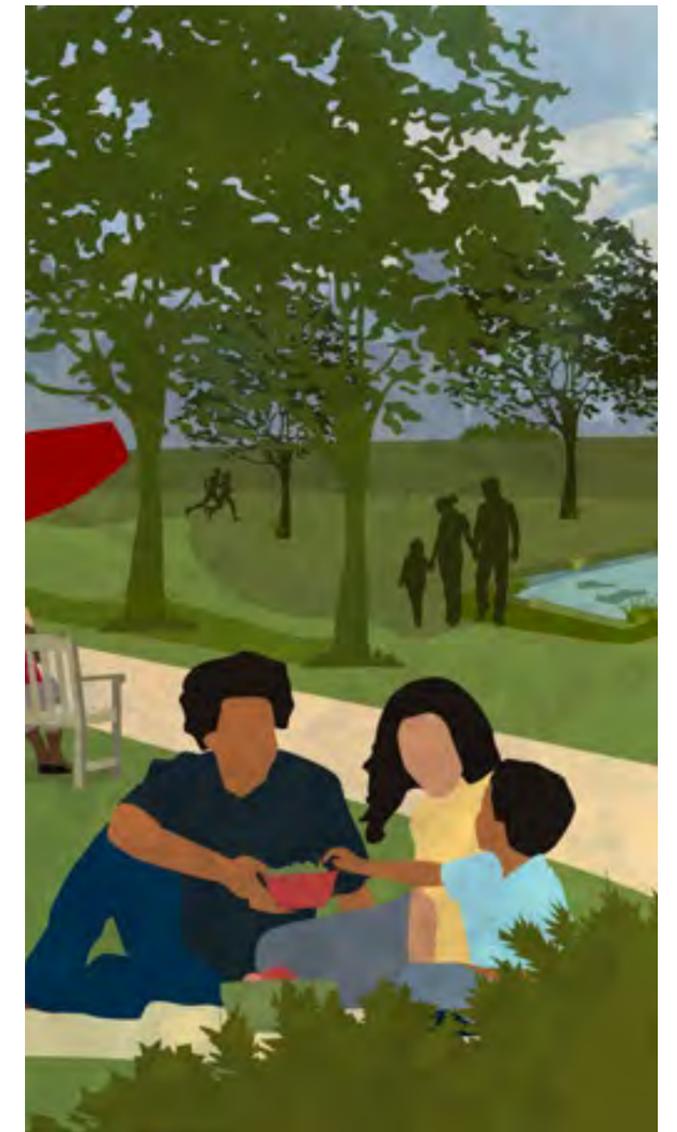
# People Centred Approach

We want to create places people will love as their own. Places that inspire a sense of pride, belonging and community spirit.

This can only be achieved through listening to people and putting their wellbeing at the heart of everything we do. We have to show care, passion and attention to detail, day after day.

When we approach development in this way, local people become our partners. They bring their own energy and ideas, and they turn a place into a real community.

These pages explain more about what it means to put people at the heart of placemaking, drawing on examples from the fantastic new communities now taking shape across the country.



# People Centred Approach



wild  
life



village  
life

# Constraints + Opportunities

The basis for high quality, place-led masterplanning is a good understanding of, and an appropriate response to, the opportunities and constraints of a site. At Almondhill we see those as being as illustrated here.

Our initial design response has been to work within the constraints and exploit the opportunities that the site possesses, with the goal of creating an exemplary, sustainable new settlement extension for Kirkliston with its own unique identity which is forged by its landscape setting and its wider context. The principal site constraints and opportunities that we have based our indicative designs on are its:

### Sloping Topography

- Ensuring that steep slopes remain undeveloped
- Using the height in the north east parcel to take advantage of the south facing distant views
- Using the gentle slopes throughout the site to inform a sensitive, natural surface water drainage strategy

### Multiple access options

- Ensuring multiple points of access for those travelling on foot or cycle to maximise permeability and connections with surrounding areas including opportunities for informal recreation
- Providing a minimum of two vehicular access points from the Burnshot Road
- Providing all modes accessibility from Queensferry Road

### Existing utilities positions and drainage ditch

- Allowing for the wayleaves for the high pressure gas main which traverses the site.
- Using these undevelopable areas positively for allotments and new community parklands
- Re-routing the existing drainage ditch which crosses the site from west to east to avoid the enforced 'parcelisation' of the masterplan, and integrating the surface water drainage requirement as a natural, landscaped swale within a linear park.

### Local noise sources

- Mitigating against the noise from the M90 spur road and Dalmeny/ Kirkliston rail chord at the north of the site by proposing a woodland buffer to separate the residential areas from the site periphery.

### Proximity to services and transport

- Being located within 700m ( less than a ten minute walk) of the village centre with its range of facilities including shops, a pub, a pharmacy, post office, library and health centre, providing the majority of everyday services within a short distance and ensuring that the ingredients are in place for a good quality of life in the local area.
- With transport options available both in Kirkliston and in nearby Dalmeny, giving good accessibility to the wider region and to Edinburgh City Centre.
- Being positioned close to the motorway network and thus giving excellent access to Central Scotland for vehicles.
- Opportunity for rail halt and park and ride facilities on land to the north of the site accessed from the M9 spur, providing public transport links to Edinburgh and wider Scotland.

### Site of Importance for Nature Conservation (SINC)

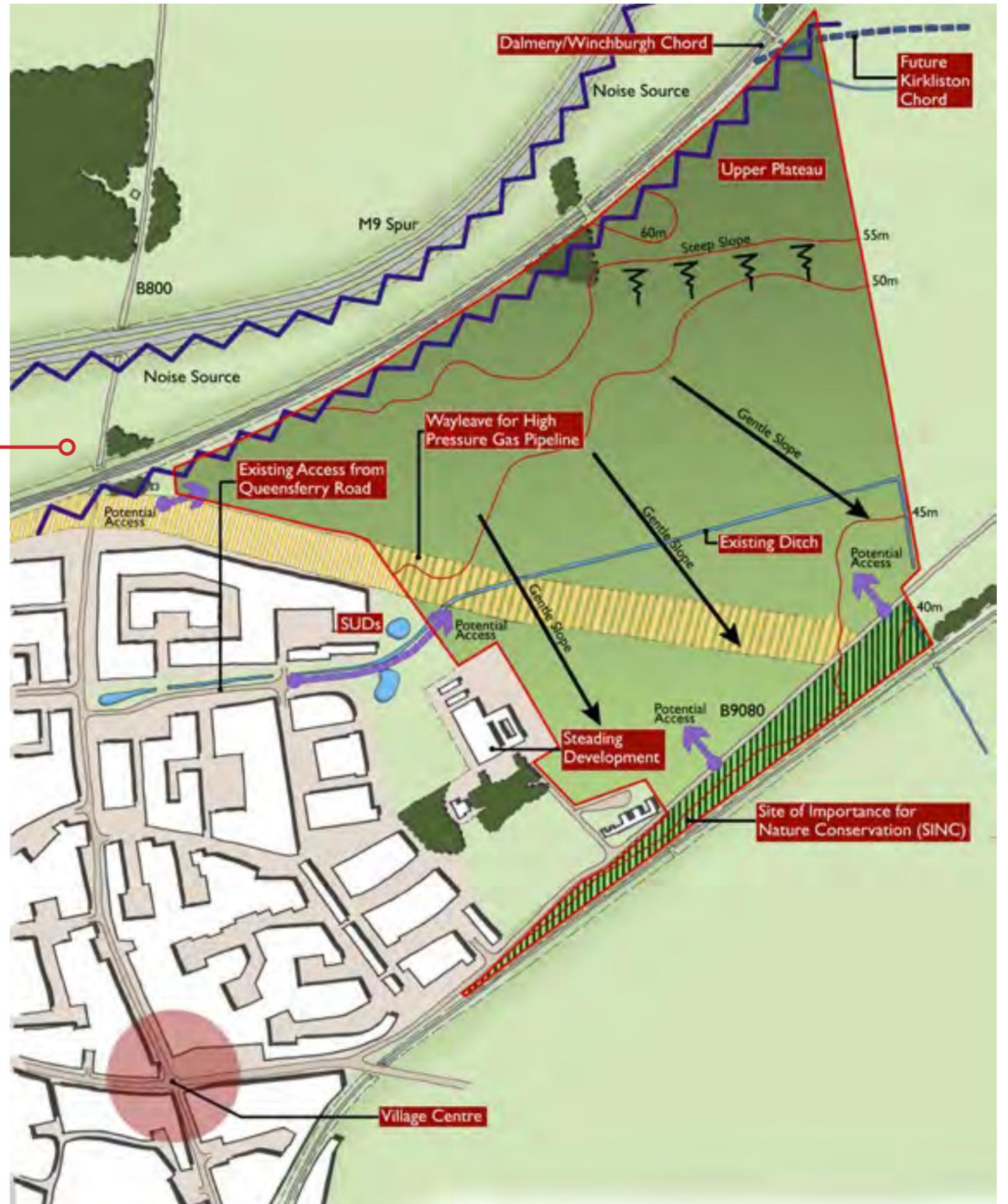
- Being found within the site boundary to the south of the B9080, and which is proposed as being retained and protected. An option may be appropriate, subject to further analysis and consultation, to enhance the biodiversity of this area with the introduction of a wetland zone at the eastern end of the SINC.

### Proximity of adjacent steadings and cottages

- At the south west corner of the site, around which a zone of woodland buffer planting could be considered to protect the visual amenity of these traditional buildings.

### School Provision and Community Facilities

- The proposal facilitates the opportunity to establish new schools for the community, increasing overall provision and reducing travel time for secondary school pupils in Kirkliston.



# Key Principles

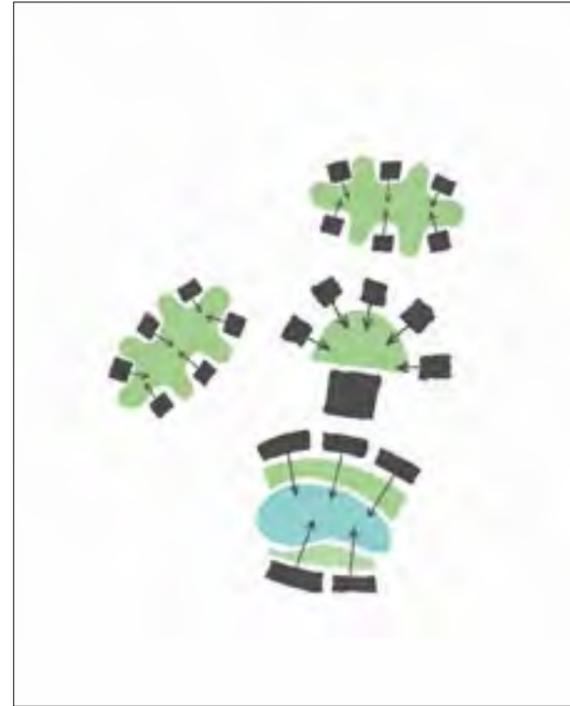
## DESIGN PRINCIPLES

Our designs will actively embrace recognized urban design best practice principles, including those of the Scottish Government's Designing Places and Designing Streets policies, as well as the City of Edinburgh's Design Guidance.

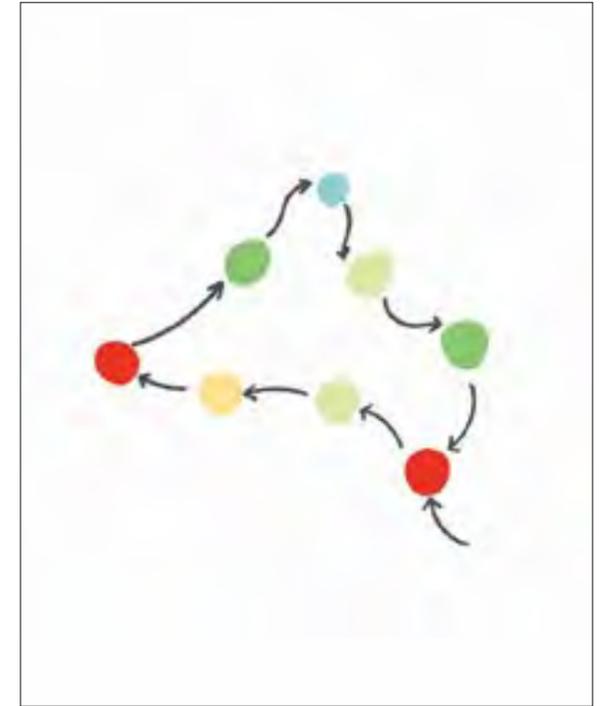
At all times in the visioning and design of our proposals for Almondhill we will seek to embed the six key qualities of a successful place required by Scottish Planning Policy. We will use the Government's Place Standard tool to ensure we deliver a successful place, creating a good quality development which will enrich the lives of our customers and those who will live there

We envisage that the following overarching design principles will underpin the future masterplan:

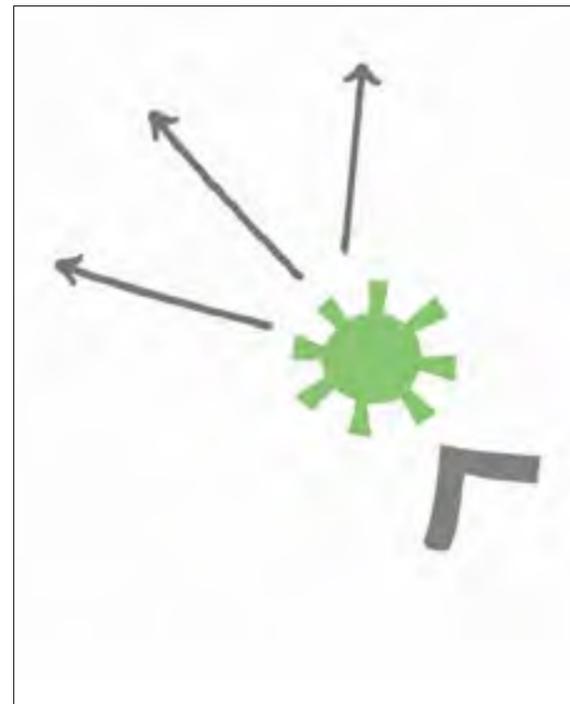
1. Creation of positive street frontages – to overlook rather than back onto streets and green spaces



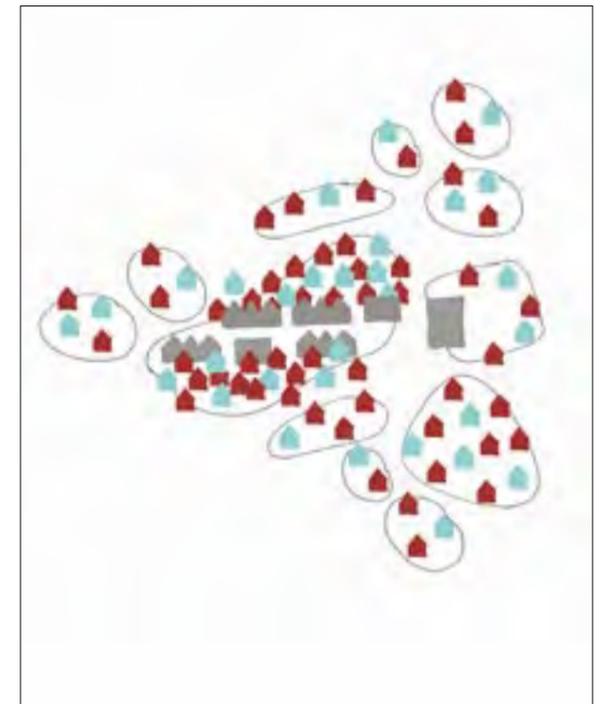
2. A strong spatial sequence – leading from one experience to another



3. Creation of a welcoming arrival space(s) – this sets the tone for all future development

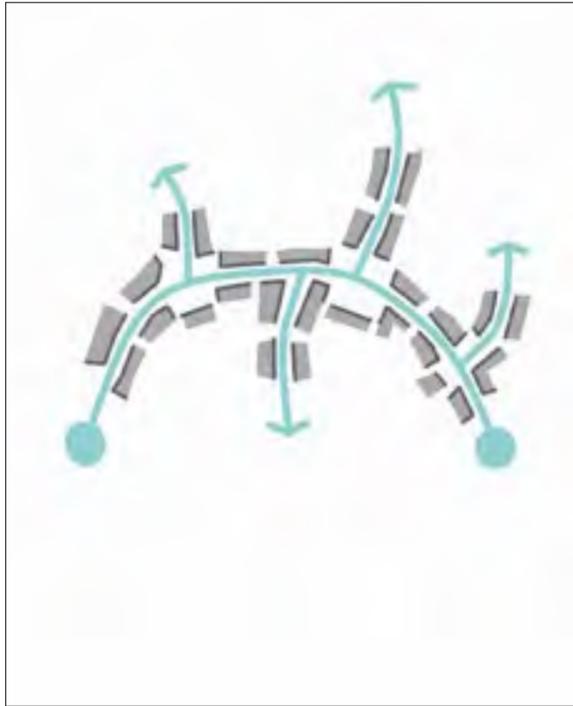


4. Diversity of scale and density – to avoid a mono-type mono-density solution

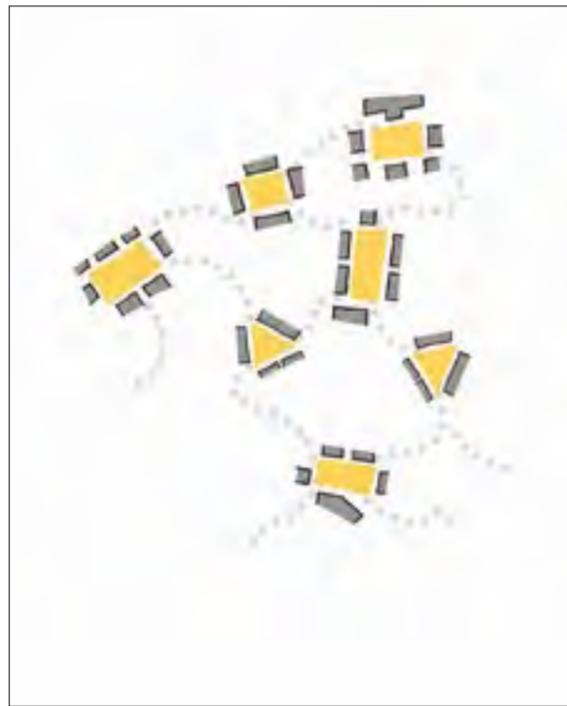


# A Vision for Almondhill

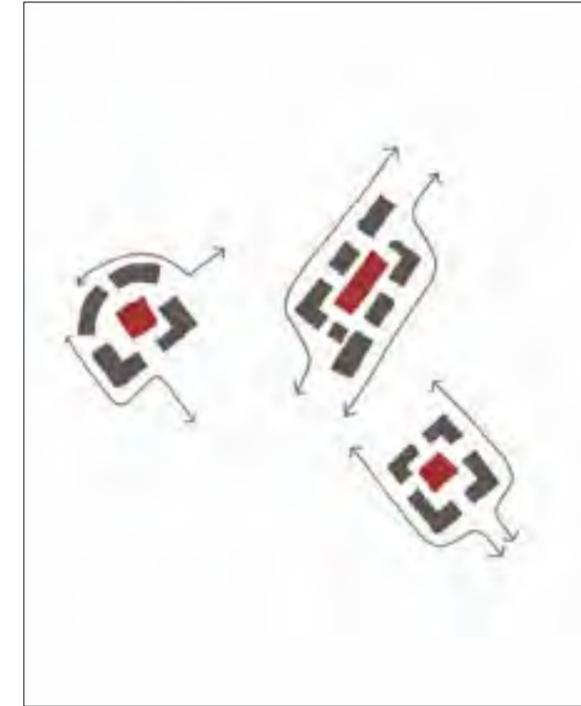
## Key Principles



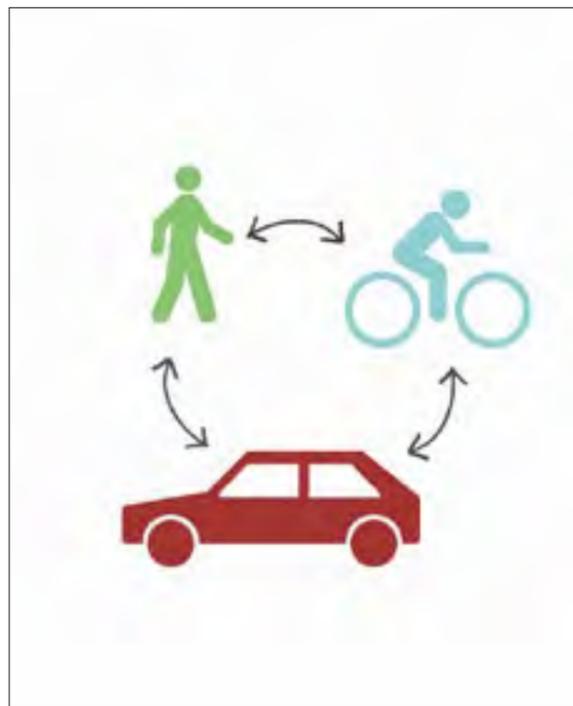
5. Integration of streets with the built form – streets not roads



6. Enclosure of public spaces with buildings – squares aren't squares otherwise



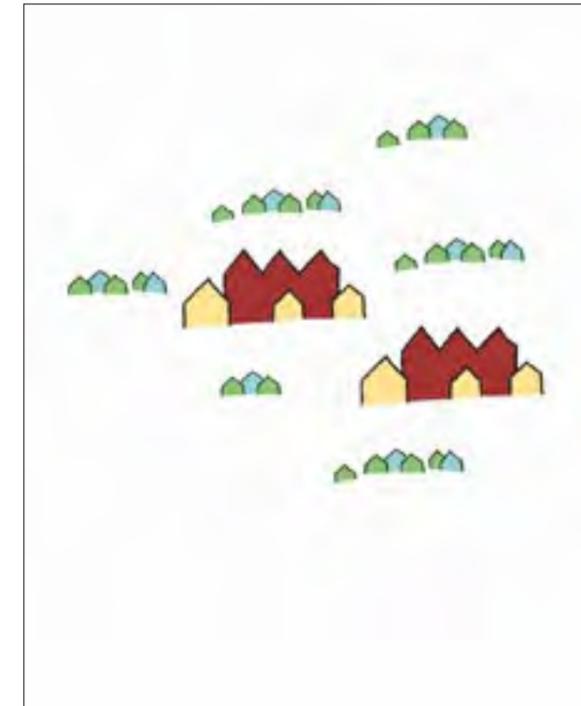
7. Sensitive integration of large format buildings – embed any new school within the urban fabric to support the streetscape



8. Promotion of sustainable movement patterns – design equally for pedestrians, cyclists and cars



9. Variety of architectural identities – to reinforce differentiated character areas within the plan



10 Landscape integration – to create a blend of town and country

# A Vision for Almondhill

## Masterplan



### DEVELOPMENT FRAMEWORK

Our illustrative development framework for Almondhill could deliver between 650 - 850 new homes at a density range of 30 – 70 dwellings per hectare, a new community campus/ school, community facilities, and an enhanced ecologically diverse landscape infrastructure including new community woodland.

The development framework has at its core the following concepts:

- DISTINCTIVE HAMLETS
  - COMMUNITY WOODLANDS
  - VILLAGE SQUARE
  - COMMUNITY FACILITIES
-

1. New Village Square – pedestrian priority square with dedicated space for community activities
2. New Linear Park – SUDs ponds, planted swales, footpaths/ cycleways, indigenous landscape, natural play areas.
3. The Boulevard – tree lined street giving access to residential areas, with planted swales and landscape
4. The Crescent – tree lined crescent giving access to residential areas, with planted swales and landscape
5. Woodland Pavilion and community woodland- promoting community involvement in the maintenance and management of the local environment
6. New principal access from B9080 formed as a roundabout to provide entry feature/gateway and to assist with speed control
7. New secondary access (simple priority junction) from B9080
8. Existing access footway extended from Queensferry Road into new neighbourhood, with potential for public transport access.
9. Potential new school campus location (primary and secondary schools)
10. New woodland tree belt along the northern boundary of the site to mitigate road and rail noise and increase biodiversity
11. Finished eastern edge to Kirkliston with development softened by tree planting, and with glimpsed views into open spaces along the town boundary
12. New woodland buffer adjacent to existing steadings
13. Residential hamlets designed along Homezone principles – shared surface streets, low traffic speeds and informal spaces for socialising
14. Neighbourhood squares/ courtyards – local focal point public spaces
15. Pedestrian and cycle connections to earlier phases of development
16. New SUDs ponds at junction of existing and proposed developments
17. Principal SUDs pond – new wetland habitat formed as gateway to new neighbourhood
18. Local Nature Conservation Site retained, protected and enhanced
19. New footway through Local Nature Conservation Site to link to village centre
20. New pedestrian/ cycle route to Queensferry Road
21. Renewable Energy Centre
22. Community allotments
23. Vehicular access from existing entrance from the B800
24. Potential pedestrian/ cycle linkage





## distinctive hamlets

We see the residential pockets within Almondhill as being distinctive hamlets designed along Homezone principles with shared spaces for people and vehicles, and low traffic speeds – places where it is a pleasure to walk or cycle, or for children to play on the street, or for people to bump into neighbours and stop for a chat.

## community woodland

The eastern edge of Almondhill is seen as being developed as a Community Woodland with an associated Community Woodland Centre that could be used by the extended local community, and run in partnership with one of the many national community woodland groups. This would be a valuable resource to the local area, encouraging interest and care in the local environment. An extensive band of woodland is proposed on this eastern edge that would incorporate informal paths, child friendly play features and nature trails.





## village square

We envisage a partly pedestrianised mixed use neighbourhood centre, the Village Square, located at the confluence of the major streets and which will be the hub of the new development – a place where local people will meet and socialise in an attractive high quality public realm.

We suggest that any new schools required to service the development and the wider area could be located at the heart of the new neighbourhood, which would help to bring life and activity to the Square.

The Square could be a focus for community life in summer months, with the potential for galas, street parties and open air events to be held here.

## community facilities

The primary movement route for vehicles will connect the new neighbourhood to the B9080, and will be bound by slightly taller buildings in places and more continuity of streetscapes with mixed use facilities. Along its length natural drainage swales and paths could be integrated into the design.



# Masterplan Analysis

## Connectivity Key

- Potential Public Transport Loop
- ... Principal Walking/Cycling Routes
- Village Centre



## Urban Structure Key

- Principal Facades
- 1 ½ - 2 Storey
- 2 ½ - 3 Storey



The principle aim of the proposed masterplan is to integrate the development into the existing settlement, without causing disruption or detriment to the existing residents. We propose two principle vehicular routes into the development which will connect directly to the existing thoroughfares, bypassing the existing residential developments.

Central to our proposed masterplan is a higher density cluster of dwellings. This will establish strong street scenes and create a sense of place, marking the central core of the new development, leading to the new school campus at the heart of the site.

# Masterplan Analysis

Land Use Key

-  Residential
-  Renewable Energy Centre
-  Potential mixed use
-  Potential Primary School/Community Campus
-  Local Nature Conservation Site
-  Community Parkland
-  Community Woodland
-  Community Woodland Centre
-  Wetland Areas
-  Community Allotments
-  School Campus



Land-use across the site is varied to establish a mix of environments to cater the needs of those residing within the new development. At the heart of our proposal is the opportunity for a new educational campus, including a primary and secondary school.

Density Study

-  High Density  
70dph x 1.6ha = 112 units
  -  Medium Density  
35dph x 1.74ha = 61 units
  -  Low Density  
30dph x 16.10ha = 483 units
- Total number of units = 656 units



The density proposed across the site is varied, helping create different character zones. The higher density buildings are clustered around the proposed school campus. This will help define this area as the “beating heart” of the development. As the development radiates from this core the density gradually decreases to a more suburban scale.

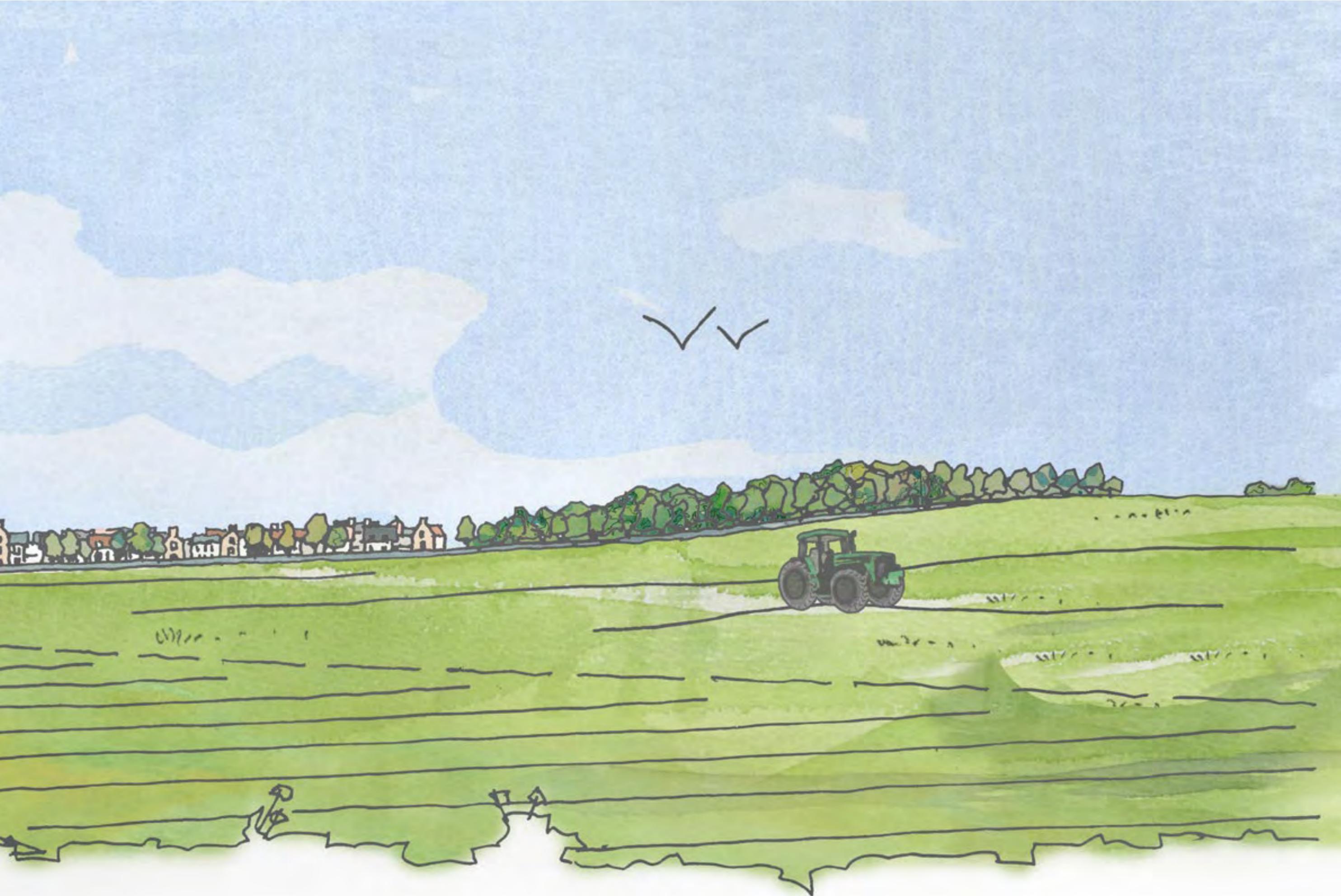
## A Vision for Almondhill

# Summary

We believe that Almondhill provides a key opportunity for a sustainable, connected, mixed use development that will help to meet the significant demand for new housing provision in the SES region and also provide land for a new education campus for Kirkliston and catchment area.

Development of the site provides an opportunity to enhance the approach to the village along Burnshot Road. The design intent, illustrated by the sketch above, would be to create a varied, welcoming and attractive new edge to the village. Development, in the form of frontages and small clusters of homes, would be visible, set amongst vegetation and fronting onto green space; designed vistas will draw the eye along linear open spaces and highlight key buildings.

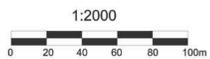








- 1. New Village Square – pedestrian priority square with dedicated space for community activities
- 2. New Linear Park – SUDs ponds, planted swales, footpaths/ cycleways, indigenous landscape, natural play areas.
- 3. The Boulevard – tree lined street giving access to residential areas, with planted swales and landscape
- 4. The Crescent – tree lined crescent giving access to residential areas, with planted swales and landscape
- 5. Woodland Pavilion and community woodland- promoting community involvement in the maintenance and management of the local environment
- 6. New principal access from B9080 formed as a roundabout to provide entry feature/gateway and to assist with speed control
- 7. New secondary access (simple priority junction) from B9080
- 8. Existing access footway extended from Queensferry Road into new neighbourhood, with potential for public transport access.
- 9. Potential new school campus location (primary and secondary schools)
- 10. New woodland tree belt along the northern boundary of the site to mitigate road and rail noise and increase biodiversity
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# Almondhill

•Kirkliston East•