

Customer Ref: 01749      Response Ref: ANON-KU2U-GWMM-Y

Name: Stuart Szylak

Response Type: Agent / Consultant

On behalf of: Hallam Land Management Limited

Supporting Info:

Email: stuart@rickfincassociates.com

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: Yes

**Explanation**

We agree with the option presented within Choice 1 and a strengthening of policies to reflect the climate change emergency and aim for a carbon neutral city by 2030. Achieving sustainable housing will be difficult if a purely brownfield housing land approach is adopted as recommended. A blended approach towards housing land would be needed to ensure sufficient open space, green and blue networks can be achieved within new development located close to transport networks. Craigiehall can assist in these objectives by connecting its strong landscape structure to the adjacent River Almond valley and wider networks in West Edinburgh, enhancing the city-wide network for active living and wellbeing. It would also contribute to biodiversity and improvements to the water and natural environment through blue-green infrastructure. Given the scale and nature of the site large areas of parkland and open space can be created and integrated with development. A new 'extra-large green space standard' is identified within our masterplan for Craigiehall with open space also available for new allotments and food growing. Policy 12 of the SDP looks for LDPs to define a green belts around Edinburgh to maintain the identity and character of the city and prevent coalescence, unless otherwise justified by the LDP's settlement strategy; direct planned growth to the most appropriate locations and support regeneration; maintain the landscape setting of these settlements; and provide opportunities for access to open space and the countryside. The SDP also acknowledges that the green belt around Edinburgh may need to be modified to accommodate development. Where land is required to achieve the strategy, effort should be made to minimise the impact on green belt objectives and secure long-term boundaries (Para 129).

Supplementary guidance (SG) on housing land was produced in 2013. This required that West Edinburgh would need to provide 2,500 additional dwellings. Also, the SG recognised that the pace of housing completions would require to increase significantly to meet the requirement in future years. Paragraph 222 of the LDP confirms that whilst the green belt is established by the plan this should not automatically preclude housing development where the relevant balance of considerations points to approval and the objectives of the city-wide designation of green belt are maintained. Policy Env 10: Development in the Green Belt and Countryside states that within the designation shown on the Proposals Map, development will only be permitted where it meets specific criteria and would not detract from the landscape quality and /or rural character of the area. It is accepted that the Craigiehall proposals do not currently accord with the types of development envisaged by the policy. Craigiehall is partly located within the West Edinburgh Strategic Development Area. SESPlan 2013 (para 42) recognises that Green Belt releases may be required to accommodate growth in the SDA. Development would therefore accord with the spatial strategy of the development plan. A portion of Craigiehall sits within the West Edinburgh Strategic Development Area which has been identified for

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strategic growth in the development plan. LDP Choice 14 highlights the importance of the area as a strategic employment centre and for housing. Elsewhere in Edinburgh the green belt, has not been viewed as inviolable for development purposes by the Council where there are justifiable reasons for such development. The principle of development conforms with the spatial strategy of the development plan and fits with criterion (b) of Policy 12 by directing growth to a location where new development is supported. Green Network proposals are outlined in paragraphs 48-54 of the LDP. This links together natural, semi-natural and man-made open spaces to create an interconnected network that provides recreational opportunities, improves accessibility within the urban area and surrounding countryside, enhances biodiversity and the character of the landscape and townscape. Developments are expected to incorporate elements that positively contribute to the green network. Craigiehall has been subject to an Environmental Assessment of the proposed development, including landscape appraisal and visual impact assessment. The character of the area has changed considerably over the last 30 years as development has taken place on behalf of the MoD. The landscape and visual impact assessment has considered the further changes which the residential development within Craigiehall will have on the area. Assessment concludes that development is visually contained and that there is minimal impact. Proposals for Craigiehall would not lead to a sporadic expansion of the city as the site sits directly adjacent to the existing urban area. As such, the green belt is not detrimentally impacted by the proposed developments with the A90 and Burnshot Road providing defensible boundaries. As a significant portion of the site is not in active agricultural use there will be no significant breach of preserving prime agricultural land. Craigiehall includes areas of woodland, open fields and public parks. Implementation of a public park in this location is identified as a key part of the Central Scotland Greenspace Network. Accordingly, the proposals could be viewed as the catalyst for the re-instatement of policy parkland. Existing woodland within the site would be substantially retained and supplemented by new belts of woodland to provide a strong green structure to integrate development into the landscape setting. Development will maintain opportunities for casual recreation and as can be seen from the layout, will provide clear links from parkland through the development to the housing using informal footpaths and cycleways. The proposals therefore fulfil the objectives of criteria (a), (c) and (d) of SDP Policy 12. They also comply with the criteria in SESplan Policy 7 in that they will be in keeping with the character of the local area and will not undermine the green belt objectives. Proposals have been carefully designed to draw upon the existing developments in the area, residential developments in terms of height and form; scale; layout, materials and detailing and have followed the design principles outlined in the Edinburgh Design Guidance. In combination with housing land supply, it is submitted that there are grounds for allocating land for development at Craigiehall. A third of the site has not been accessible to the public for many years (MoD land), and this can now change. Development will allow the public to enjoy the open spaces created and will provide an opportunity to re-establish the links between policy landscapes for public enjoyment. Accordingly, it meets key objectives within the Environmental and Landscape Reports and can assist in enhancing the green network in West Edinburgh linking Cramond with Kirkliston, Dalmeny and South Queensferry. Development at Craigiehall is therefore strongly in conformity with Choice 1. Craigiehall is recognised as an important landscape resource and an integral part of the green network which is already used for access and recreational purposes. The proposed development would conserve and enhance the existing policies in accordance with the aspirations of Historic Environment Scotland and the Council.

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Choice 1 B

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

Short Response

Explanation No objection subject to specifics as the intention of this policy is unclear and there is no detail upon which to base a response. Craigiehall has significant green and blue infrastructure components which are identified within the Craigiehall Masterplan and considered as part of an Environmental Assessment. It will be important to ensure that any policy shift does not restrict land supply or constrain the delivery and implementation of land for housing on site.

Choice 1 C

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

Short Response

Explanation In principle we agree with measures that assist water management and climate change particularly if this facilitates the allocation and delivery of sites such as Craigiehall. The proximity and importance of the River Almond in this regard is recognised.

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 Agree. Existing under utilised open space and landscapes are consolidated in to the Craigiehall Masterplan and will be actively used by the local population.

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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

Choice 1 F

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

Short Response

Explanation

Choice 1 F

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

Short Response

Explanation

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Choice 1 G

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

Short Response: Not Answered

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: Yes

Explanation: Agreed. Long term maintenance and management arrangements would be subject to a management plan and factoring arrangements at the Craigiehall development.

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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** This policy objective is rather unclear as Design and Access Statements already cover these issues including reference to climate change, energy and waste. Clarity is required on this matter and it should be determined what information is required and in what format for planning purposes. The underlying aims of Choice 2 are agreed. A more consistent approach to design layout and accessibility is welcomed and would benefit Craigiehall in comparison with other competing sites. We wish to see an efficient use of the MoD and Rosebery land at Craigiehall. Achieving this aspiration will be difficult if a purely brownfield housing land approach is adopted. Many brownfield sites would be restricted in developable area once open space and car parking requirements are met. A blended approach towards housing land would be needed to ensure enough developable land is available to meet housing needs. Choice 2B suggests density levels which would make best use of the land and ensure against underdevelopment. Assessment of this by EMA Architects on behalf of HfS casts serious doubt on whether the specified densities (minimum 65dph) can be achieved on many sites. It also points to a lack of evidence and analysis which leads to prescriptive overly stringent approach to minimum densities. Until there is better evidence, we would suggest that no change is made to density policies which could be detrimental to the market supply and delivery of housing as well as affordable stock. Rather than sufficient greenfield space is allocated for development to allow all development within the city to be at a density that respects its surroundings, as is currently the case. Development at Craigiehall will respond to climate change, accessibility for all ages and mobility needs. This could be provided through adapted dwellings and dedicated care provision. The proposed neighbourhood centre, commercial area, community facilities and primary school are included to serve the proposed residential element of the development site and ensure the proposals are compliant with the walkable neighbourhood principles contained within Designing Streets. This will be conducive to improving quality and density. Density levels themselves should reflect the unique characteristics, landscape setting and topography of the site. Opportunity exists for areas of the site to be high density with other areas reflecting the urban edge location and transition to the countryside fringe. A revised Craigiehall Masterplan has been produced as part of this representation. The amended layout is revised to reflect City Plan 2030 objectives and SPP objectives regarding streets and high-quality layouts. The Masterplan also delivers high quality useable open space and would stand up well to scrutiny because of more rigorous policy standards. The Craigiehall Masterplan is an inclusive and sustainable blueprint for a high quality of development at an appropriate density. Craigiehall will cater for people of varying needs, age and mobility. It therefore strongly complies with the objectives of the MIR.

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Choice **2 B**

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

Short Response

**Explanation** Craigiehall represents an efficient, sustainable and viable use of brownfield and greenfield land. The Craigiehall masterplan indicates the type of density and development that can expect to be achieved on site by developers/ housebuilders. The planning system needs to be responsive to the needs of the market, flexible in allowing a mix of development and have regard to viability and delivery. In terms of density we would concur with the conclusions reached by Homes for Scotland and EMA Architects. A greater degree of flexibility is required to take account of market demand, housing mix and site characteristics.

Craigiehall will be capable of accommodating a wide range of densities and house types, more so than many other urban or greenfield sites. This accords with SPP. Notwithstanding this issue requires further consideration and research.

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** Agreed. The Craigiehall Masterplan delivers active travel and connectivity links as required by the Council. It is a high quality permeable and interlinked layout which encourages public transport patronage.

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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

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

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Choice **4 A**

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

Short Response

**Explanation** There is currently limited information and guidance on the content and process of producing Local Place Plans. Further detail on the implications and relationship to the LDP is required. Local Place Plans would need to integrate with the statutory procedures and development management process. LPPs should be seen as a means of facilitating delivery and involving key stakeholders in implementation. Issues relating to feasibility and viability need to be considered in accordance with the statutory provisions of the Act the Circulars and Regulations. Planning obligations need to be clearly related to the scale and scope of development, and Craigiehall is well placed to deliver significant benefits in this regard.

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** Noted and this is a matter for the Council and further details are required particularly in relation to the proactive policy role and that of statutory development management as the planning authority. The Council needs to broker the optimum solution for sites having regard to all relevant policy and material considerations. All planning obligations and contributions should be determined and agreed with reference to a sound evidence base. Where would the Council funding and resource come from to support LPPs, and how would the Council choose which ones to support, there could be many coming forward?

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Choice **5 A**

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

Short Response

**Explanation**

A major advantage of Craighiehall is the fact that there is existing infrastructure and services on site to facilitate new development. Furthermore, the scale and nature of the site allows for sufficient space to be made available for supporting facilities such as schools, healthcare, quality bus corridors and a dedicated park and ride facility. We are in broad agreement with the sentiment of the preferred choice but reserve our position pending further information on detailed educational matters such as educational catchment arrangements. Craighiehall can assist in relieving current pre-existing pressures at primary and secondary level across West Edinburgh (South Queensferry and Kirkliston). Proposed educational infrastructure for West Edinburgh is particularly vague and lacking in detail. Further work and information are required on the practicalities/ deliverability of both potential brownfield and greenfield options identified.

Regarding the availability of education and health facilities these have been considered as part of the previous application. A primary school can be provided on site together with a new secondary school to service west Edinburgh. It is intended make appropriate education contributions in line with the Council's Supplementary Guidance on developer obligations to mitigate the impact of development. Land can also be made available for health facilities without directly delivering the infrastructure. Hallam Land will comply with the terms of Policy Del 1 and Scottish Government Guidance on planning obligations, including the funding of improved amenity/parkland. The criteria within Policy 7 of SESplan 2013 and Policy Hou1 on the provision of infrastructure in relation to the release of greenfield housing sites can therefore be met. In addition, we are at a loss to understand the arrangements for Kirkliston and South Queensferry proposed within the LDP. It is noted that there is no site or funding in place for a new secondary school at Kirkliston. Financial contributions together with 35% affordable housing will need to be carefully considered against other costs in relation to the viability of Craighiehall and economies of scale. Craighiehall can assist in delivering new school infrastructure in a location that can best serve existing pressures in West Edinburgh and Kirkliston. A secondary school could be delivered on site or important financial contributions made to the West Edinburgh school. A new primary school is proposed as part of the development and land made available for this. A new local / neighbourhood centre is proposed and this could attract community facilities such as health centre/pharmacy etc. Finally, a number of listed buildings will be retained, and they may well lend their use to a community facility. We note that a Primary Healthcare Appraisal is not yet available and is an additional deficiency in terms of determining an appropriate policy on this issue. Provision is made for access to public transport and active travel including contribution to a subsidised bus service. Indeed, the Council's Active Travel Team sees the merits in the location of Craighiehall and the value nearby travel networks can bring to the site. We do not comprehend how the A90 is not identified as a preferred corridor within the Sustainable Travel Study and query the methodology in this report. Otherwise Craighiehall complies with the City Mobility Plan and an interchange hub for sustainable transport modes is identified in the Masterplan. The fact that available infrastructure exists at Craighiehall is a major advantage in terms of sustainable development and delivery and, should be recognised within the spatial strategy allocations. Provision for community infrastructure is made within the Craighiehall Masterplan.

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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

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

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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** Noted, but there are no specific targets identified and the lack of detail makes a response difficult. Any targets set need to be realistic and at present there appears to be a disconnect between the LDP Sustainable Transport Strategy and City Mobility Plan. The location of land at Craigiehall is well positioned to maximise development in accordance with the City Mobility Plan and the Sustainable Transport Strategy being adjacent to a quality bus corridor. Craigiehall will therefore become a natural extension to the city. It is our contention that the M90 should be identified as a strategic transport link and can serve development in a sustainable and integrated manner. Support for this preferred choice is qualified in respect of the Council's targets for sustainable transport modes in this part of Edinburgh. A well-planned road network within the site will be designed to facilitate public transport operators. A quality bus corridor and pedestrian links will be created to promote sustainable travel. The site will be served from Phase 1 by a bus service which will be funded by the applicant as referenced in Choice 5. A 500 car Park and Ride site adjacent to a new transport hub/ interchange is proposed. This will facilitate public transport to Kirkliston, South Queensferry as well as the city centre. It would address a gap in provision on a key arterial route into Edinburgh and address the dispersal of housing to Fife within SDP1. Walking and cycling are a key part of the Masterplan and enhanced routes are planned through the development. The Council's Active Travel Team sees the merits in the location of Craigiehall and the value nearby travel networks can bring to the site. A proposed neighbourhood centre, commercial area, community facilities and primary school are included to serve the proposed residential element of the development site, and ensure the proposals are compliant with the walkable neighbourhood principles contained within Designing Streets. The amenities proposed are well within the recommended walking distance of 1,600m as detailed in PAN 75. The location and form of development therefore fully complies with this objective and is capable of implementation through the Local Place Plan.

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Choice      6 B

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

Short Response: No

Explanation: It is not clear that this is a function of Place Briefs. This is for policy or supplementary guidance to set?

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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** Yes, subject to the detail of this policy to ensure these are not prohibitive in terms of housing development or location. At present there is insufficient detail to respond to 'targets' or traffic management measures. In terms of Craigiehall the proposed approach would appear to be rather punitive as opposed to encouraging other modes of transport and utilising the Park and Ride opportunity. We note the Councils preference for removal of minimum parking standards and car free developments. This will only be feasible in certain circumstances under a brownfield scenario and with a step change in public transport provision. It is difficult to envisage how the major employment sites being promoted by the LDP would operate effectively in such circumstances. As a site on the urban edge adjacent to a public transport corridor, development at Craigiehall will support the City Mobility Plan and restrict demand for vehicular movement in and out of the city. The development will contribute to public transport and car club initiatives as well as electric car charging points. Currently Policies 7 of SESplan 2013 and LDP Policy Hou 1, require developments to provide appropriate infrastructure. This is supplemented by Policy Del 1 Developer Contributions and Infrastructure Delivery. All relevant infrastructure can be provided. Policy Tra 8 of the LDP requires development proposals relating to major housing which would generate a significant amount of traffic to demonstrate through an appropriate transport assessment that any impacts of the development will be addressed and mitigated. Any potential improvement works can be secured through a legal agreement if planning permission were granted. The Craigiehall Transport Assessment concludes that the site is accessible by a range of transport modes and located within walking distance of local services. Further the development provides opportunities to link the internal network to the existing pedestrian, cycle and public transport networks with the aim of ensuring that as the development progresses, all areas are able to utilise non-car modes.

Our transport analysis predicts that all junctions in the area will operate satisfactorily with the addition of the traffic, together with traffic from committed developments in the area. Craigiehall can provide the opportunity for people to live within walking/cycling distance of employment areas, with the potential to restrict the long-term growth in car borne traffic. The proposed Park and Ride is in a highly efficient and convenient location for residents and commuters of both the new development and surrounding villages and towns. Craigiehall therefore fully complies with this objective in terms of reducing the number and length of trips.

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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

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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

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**

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Choice 9 A

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

Short Response

Explanation

Choice 9 B

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

Short Response

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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** Student housing will need to be more integrated with other forms of housing and mixed-use provision across the city. Craigiehall may have has the potential to incorporate some limited student housing and other forms of specialist provision as part of a sustainable approach to balanced communities. However, the assumption that using 'the limited space in our city to ensure the creation of sustainable communities' is not accepted or evidenced in any way by the Monitoring Report. Indeed, it could have serious non intended consequences for housing supply. This issue also needs to be seen in the context of the overall requirement and demand for housing in the city from all sources, including visitors and students as well as specialist housing types. We understand that Homes for Scotland is undertaking some relevant research for the LDP in this regard. We are therefore not in agreement with the Council's estimates in terms of requirement to 2030 as this would provide for a gross undersupply of sites for the city. We are therefore in support of a more blended approach to housing development. Alternative commercial, student, retail and leisure developments should be seen more positively as part of strong sustainable communities. These can often complement neighbourhoods where there is a demand for enhanced facilities and could potentially be accommodated at Craigiehall if appropriate. Growth of the city's universities and further education sector is a key part of the Economic Development Strategy with the key institutions projecting expansion in student numbers. Changes proposed by the Choices report appear to introduce regulations for student well-being that seek to regulate the market in a highly complex manner. The simplest way of relieving pressure and providing choice will be to increase the stock of available housing in order to meet projected household and student numbers in the city. Craigiehall would be an appropriate location for mixed use development and could potentially incorporate an element of student housing in compliance with Choice 10. The addition of a new greenfield allocation for approximately 1200 houses in West Edinburgh would assist in relieving this pressure on stock elsewhere in the city and allow re-locations and flexibility in the market.

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Choice **10 B**

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

Short Response

Explanation

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

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Choice **11 A**

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

Short Response

**Explanation**

The increase of the affordable housing requirement from 25% to 35% is noted although again there is little justification or evidence to support this policy shift. It is considered that the most effective means of delivering affordable housing stock is by ensuring a healthy supply of market housing through land allocations such as Craigiehall as part of the whole system approach. We do not accept that the Council and its partners can deliver the requisite supply of affordable housing over the plan period without leverage from the private sector. Craigiehall is capable of accommodating such a shift in policy given the nature and scope of development being proposed there through the Craigiehall Masterplan. The Council's aspirations to provide 20,000 new affordable dwellings in the city up to 2030 is noted and supported. Whether this is achievable in real terms remains to be seen as it will require a level of performance and delivery which hitherto has not been achieved. Increasing the Affordable Housing quota to 35% essentially requires a ratio of affordable to market housing of 1:2 rather than the current 1:3. This has implications for viability and delivery, particularly given the reliance on more difficult and costly brownfield sites. The implications for development economics become more complex when considered in conjunction with Choice 10 above. The Council's approved the Council's Strategic Housing Investment Plan (SHIP) 2020-2025 for submission to the Scottish Government. It highlights the significant challenges associated with fulfilling the Council's commitment to deliver 20,000 affordable homes over the next 10 years, including securing both land and finance. In debating the SHIP, councillors highlighted that the requirement for affordable housing in the SHIP exceeded the land identified as available in the 2019 Housing Land Audit and as such a lot more land would be needed. The Council was working on its Choices document for the next local development plan which will set the housing requirements for 2020 to 2030. This shortage in land supply was recognised by the Council when approving its latest SHIP. The Council was to have brought forward its Choices document outlining how it intends to provide sufficient land to meet its housing land requirements. It is appropriate to wait until a new LDP is in place to start to address the shortfall in supply, particularly given the need to deliver in the region of 2,000 affordable homes every year in accordance with the SHIP programme. The Reporter in the SESplan 2 examination acknowledged that new land would require to be released to meet the demand for affordable housing. Delivery of this quantum of development will require more land to be identified in locations such as Craigiehall. It is in such locations where the Council can meet objective B and be more prescriptive in terms of tenure mix and on-site provision. In order to meet the 35% affordable housing objective, the Council will need to take a more realistic and flexible policy to allocation as part of a blended housing land approach. Furthermore the 35% may well be achievable but this commitment will need to assess requirements from other policy areas on a cumulative basis to ensure that developments are viable and deliverable. It is submitted that that the development at Craigiehall could support the new quota, given that it has scale and critical mass. The land is already serviced and therefore it would be able to absorb abnormal costs more readily than alternative locations.

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

Supporting Info   
Email

Choice **11 B**

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

Short Response

**Explanation** Agree that a mix of housing types and tenures is desirable with a general focus on family housing. Any policy in this regard needs to have flexibility and be responsive to ongoing changes in the city-wide housing market. The means of achieving this needs to be carefully considered and is not evident from the information provided that a more 'prescriptive' use can be evidenced or justified through needs assessment/ waiting lists. It is not clear how the LDP can be 'prescriptive' in terms of overall provision particularly in relation to market housing over the period of the plan. Furthermore, such a policy would need to take account of the locational and physical characteristics of individual sites. There is no indication of how such a policy would work in practice and an attendant risk that it may restrict supply and exacerbate problems of affordability price and rental levels.

Customer Ref: 01749      Response Ref: ANON-KU2U-GWMM-Y  
Name: Stuart Szylak  
Response Type: Agent / Consultant  
On behalf of: Hallam Land Management Limited

Supporting Info:   
Email: stuart@rickfincassociates.com

Choice      12   A

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

Short Response: Option 3 (Blended)

**Explanation**

The questions of how many homes are required in the city, where and how these will be delivered, needs to underpin the MIR as it impinges on several interrelated policy areas. A key difficulty for the Council is the lack of strategic guidance in terms of housing targets or any form of spatial strategy associated with the distribution of land. In terms of the quantum of houses required to 2030 the MIR relies on the extant SDP which was approved in 2013 and is now considerably out of date. SDP2, based on a new HNDA, was rejected by Scottish Ministers on transport and spatial strategy grounds in May 2019. As a consequence of the Planning Scotland Act 2019 there will be no agreed housing requirement until NPF 4 is approved in late 2021. The Council's Housing and Transport studies are currently considered to be unsuitable evidence bases for determining these issues specifically in relation to Craigiehall. Indeed, we consider both to be fundamentally flawed in terms of the West Edinburgh SDA and the specific consideration of Craigiehall and the M90 corridor. The proposal to base City Plan 2030 on targets within SDP1 and HNDA2 is therefore open to question and interpretation, for reasons as set out in the MIR itself. Not only are the figures historic, scenario based and Lothian wide. In particular there is no breakdown for Edinburgh beyond 2024. If HNDA 2 is used as a reasonable baseline both the preferred and alternative options relating to the housing targets of 43,400 and 52,800 respectively fall significantly short of meeting need and demand in full. There is no justification why this should be the case and why the undersupply of housing is not being addressed. Indeed, it is expected that the Council should set challenging targets in the LDP in light of private housing land completions in recent years. On this basis under the preferred option in addition to 20,800 affordable houses, the market housing target is 22,600 units. However, these figures represent broad estimates which are largely unsupported by up to date evidence and household projections. In addition, this approach is not considered to be realistic feasible or deliverable over the term of the LDP. Regarding delivery, the City Council considers that there is currently sufficient land for 47,000 houses. Of this 9,200 has no consent and 16,900 is brownfield or windfall supply. Programming indicates that not all sites in the 2019 HLA will be complete by 2032. Extrapolating the figures in accordance with SPP, Circular 2/2010, current practice (DPEA) demonstrates that using this method only 21,055 dwellings would be delivered on effective sites. Constrained sites should be excluded from the analysis and only effective sites should contribute to the land supply. The Council's Housing Study is sub divided into two parts which are internally inconsistent and do not relate to equivalent sub-divisions. There are 23 Assessment Areas, none corresponding to Craigiehall, however it should be noted that nearby Area 22 West Edinburgh scores particularly well on the given criteria in Figure 2 Assessment of Site Groupings. The brownfield Urban Area Site Assessment identifies 142 sites with development potential and a notional density capacity of 16,900-27,000 units. Based on Figure 4 Estimated Site Capacities, this is considered a gross overestimate of urban brownfield capacity within the city and completely underestimates the difficulties of delivering such land. It should also be noted that there are no brownfield sites identified within the M90 corridor or in the vicinity of Craigiehall. This is despite both Craigiehall and the nearby Royal Elizabeth Yards being in marginal (temporary) employment use. The assessment of potential housing land sites in the urban area is not properly considered in terms of delivery or economics. It is assumed that all sites (16,900) identified will be delivered in full which is not a credible proposition particularly given ownership, cost considerations and economic viability. The preferred option is reliant on Compulsory Purchase with long lead in periods and legal issues. It is rendered unfeasible by this approach and emphasises the need for additional

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greenfield allocations. The greenfield or market requirement is informed by the housing land supply target and HNDA as discussed above. Option 2 with a requirement of 28,000 houses, provides a reasonable indication of what the market approach should entail including a generous provision for affordable housing and urban area brownfield development. In respect of Greenfield Housing the methodology is 'partially based' on Strategic Development Areas without justification for their continued existence, as opposed to development corridors. It is also done in the absence of information from the Council's emerging West Edinburgh Study. Craigiehall is considered under Sector 6 which also covers Kirkliston and South Queensferry. West Edinburgh is Sector 1 which is only one of two sectors based on SDAs. The evaluation methodology for Craigiehall is considered to be flawed and inconsistent, both in its content and detail but also in respect to comparator sites. We have assessed the Sustainable Transport Study, the Landscape Study and the Environmental Study and re-evaluated the merits of the Craigiehall site. In terms of scoring we would make the following comments in respect to key criterion.

- Craigiehall is on the edge of the West Edinburgh SDA and part of the site lies within the West Edinburgh Area of Search. It should be considered as part of these zones for development purposes.
- In relation to Convenience this is partially compliant, and the development will have on site neighbourhood facilities.
- Employment land is identified on site and there is access to nearby opportunities at Royal Elizabeth Yards and Edinburgh Airport as well as the A90 corridor.
- Development would support active travel and footpaths already exist. The Council's Active Travel Team sees the merits in the location of Craigiehall and the value nearby travel networks can bring to the site.
- Public transport linkages exist and are enhanced through masterplan interventions.
- Community infrastructure is provided through an onsite primary school, there is potential for a secondary school site and contributions to wider infrastructure.
- Any impact on the landscape character can be adequately mitigated and the analysis does not relate to the landscape or environmental assessment work carried out as part of the PPP application and EIA.
- Green Network – fully compliant
- Flood Risk – All concerns raised by SEPA in response to the PPP application were addressed and SEPA withdrew its objection to the proposals. RFA has produced an alternative and more accurate and informed scoring for the site, as presented in Appendix 1. Perversely, in terms of Site Selection the MIR rejects Craigiehall and identifies Conifox, Carlowrie and North Kirkliston as potential development areas as reasonable alternative choices for greenfield housing land release. These areas are relatively recent additions to the Edinburgh Green Belt. This is on top of recent significant development in Kirkliston which has had limited time to integrate effectively into the wider settlement. In effect more development sites are identified outwith SDAs than within them. This evaluation does not bear objective scrutiny in locational, sustainability or material planning terms. The Sustainable Transport Study does not identify the A90 corridor as a Priority Transit Corridor. We fundamentally disagree with the flawed approach taken to evaluation in relation to Queensferry Corridor 9 and have reassessed the Table 5.2 Transit Assessment – Summary Findings. We also respond to Table 5.3 Transport Priorities in Non- Transit Corridors. Associated with this is the City Mobility Study Which puts great emphasis on Park and Ride schemes.

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **12 B1**

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

Short Response

Explanation

Choice **12 B2**

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

Short Response

Explanation

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

Customer Ref:

01749

Response Ref:

ANON-KU2U-GWMM-Y

Supporting Info

Name

Stuart Szylak

Email

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Response Type

Agent / Consultant

On behalf of:

Hallam Land Management Limited

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

Not Answered

Explanation

Choice

12 B5

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

Short Response

Not Answered

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

Not Answered

Explanation

Customer Ref:

01749

Response Ref:

ANON-KU2U-GWMM-Y

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Choice 12 B7

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

Short Response

Not Answered

Explanation

Choice 12 B8

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

Short Response

Not Answered

Explanation

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

Not Answered

Explanation

Customer Ref: 01749      Response Ref: ANON-KU2U-GWMM-Y

Name: Stuart Szylak

Response Type: Agent / Consultant

On behalf of: Hallam Land Management Limited

Supporting Info:

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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: Not Answered

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**

We object to this section of the Choices report as it is our contention that green field release is grossly underestimated on any analysis of the housing land requirement figures. None of the proposed greenfield releases are specifically supported as the premis for the preferred approach is flawed. A more comprehensive blended approach with increased greenfield allocations is advocated as suggested in Option 3. Notwithstanding, more than the 6,600 units of greenfield land will be required over the plan period.The strength of the Edinburgh economy requires additional housing land to be made available given current and projected levels of population and household growth. The Housing Supply Target calculated in accordance with SPP provides for a requirement of @ 37,000 houses.There is a lack of an adequate policy or evidence base and acknowledged difficulties in respect of delivering brownfield land on urban capacity sites (11,000 homes over the plan period).Also, Edinburgh needs to redress previous shortcomings and take responsibility for a higher proportion of its % land supply and allocate to a target of @ 28,000 houses as suggested in Option 2. In terms of 12B relating the delivery of 43,400 homes is unambitious and based on conservative rates of combined (market and affordable) construction rates of 3,340 per annum.Conversley, the Council identifies capacity for 47,000 homes. This is focused on 275 hectares of urban area land with assumed potential for mixed uses. As identified, much of this urban capacity land is in employment use and its re-development will not only be problematic but will remove valuable local employment land for small businesses.Alternative forms of delivery are considered through the Council and its partners or through the market housing developers. The former requires additional land for 17,600 units and the latter land for 27,900 units, both allowing for only 10% flexibility and an affordable housing quota of 35%.The latter option is closer to the housing land requirement advocated by HND A2 and delivers 79% of Edinburgh’s target. Despite being challenging in terms of construction, this still represents a significant shortfall in housing land target over the plan period. Under 12C a blended approach requiring 17,600 units with greenfield land release of 6,600 units is considered. Given the status of urban land and for the reasons above the delivery of 11000 on brownfield land is highly ambitious. Nonetheless, remarkably Option 1 Delivery by the Council and its partners within the Urban Area is the preferred optionEach of the 3 Options makes a range of assumptions. The preferred option relies on rapid intervention significant changes to infrastructure co-operation with public sector partners, the delivery of 275 hectares of employment land / mixed use redevelopment and a significant CPO programme. There is no evidence to suggest that this is feasible or financially credible in terms of resources or programme nor has the impact of this approach has not been assessed.It is claimed that the preferred approach ‘minimises the amount of new homes we need to build to reach our affordable housing target with no greenbelt release’. Remarkably, the Council goes on to state that this approach may not be financially viable to deliver an annual rate of 3,340 units per annum.Despite this the Council rules out a market/developer led greenfield approach requiring 27,900 units (4,600 houses per annum). It relates this spuriously to the climate change commitment, infrastructure costs and market demand. A blended approach which requires greenfield release of 6,600 units will not be sufficient for the reasons stated above and we would urge the council to review this option with a replenished greenfield element of @ 16,700 units to compensate for the deficiency in the projected land supply.The current spatial pattern for greenfield sites identified in the alternative scenarios does not appear to be logical or coherent in terms of the LDP s underlying aims. Indeed, some proposed allocations are directly contrary to the LDP objectives.We object to Craigiehall not being

Customer Ref:

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identified within the greenfield or blended approach particularly given the overwhelming evidence in favour of additional allocations. It is not for individual developers to object to allocations particularly in circumstances of a projected land deficit.

Choice

12 C

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

Short Response

Yes

Explanation

Choice

12 C

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

Short Response

Yes

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **12 C**

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

Short Response

Explanation

Choice **12 D**

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

Short Response

Explanation

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

Supporting Info   
Email

Choice **13 A**

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

Short Response

**Explanation** Noted as part of the ongoing Economic Development Strategy for the City. Inclusive growth will assist in strengthening the housing market. The preferred strategy choice however is opaque and refers to Choice 14 which relates to Delivering West Edinburgh. This is not yet available, so it is not possible to fully comment in relation to potential implications for Craigiehall. Craigiehall provides an optimum opportunity to integrate employment and housing markets in West Edinburgh. City Deal will, if properly implemented, support the growth of this sector. Craigiehall can also contribute to the sector as an outreach campus for education and cultural activities. Craigiehall provides an ideal location and platform for such a policy approach to 'good growth'.

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

Supporting Info   
Email

Choice 14 A

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

Short Response

**Explanation** West Edinburgh needs a broad area of search including Craigiehall, which is partly within an SDA and adjacent to a main public transport road corridor (A90). It is capable of mixed uses and well served by public transport integrating with the Commercial and Industrial needs Studies as well as the City Mobility Plan. It is unclear how the exercise being undertaken to inform this policy can avoid being entirely site specific and further information is awaited from the Council in this regard. Craigiehall should be considered as part of this review. Delivery of West Edinburgh as a national priority is supported and Craigiehall should be an integral element of the strategy. However absolute adherence to the Strategic Development Area boundary is not agreed as relevant and greater flexibility is required recognising the importance of the A90 corridor. Accordingly, the area of search should be extended from the Firth of Forth to the Pentland Hill fringes as large parts of the current area are allocated, consented or under development offering limited opportunity for further housing or economic development to be identified in this LDP. West Edinburgh is a fundamental element of the City’s Economic Development Strategy. The MIR refers to the West Edinburgh Study, but choices have been made without any findings of this Study being available for scrutiny as part of the LDP Choices Report. This disallows proper consideration of this part of the Plan at a critical stage of the LDP process. The Craigiehall site contains brownfield employment land and the MIR ‘expects older estates and business floorspace to be re-developed for housing and other uses. Craigiehall lies, in part, within the Area of Search. The Area of Search is noted by the Council as being well served by transport and potential benefits from the City Deal, yet the appraisal of the Craigiehall site takes no account of this. Craigiehall is well positioned to make best use of existing public transport infrastructure and propose enhanced connectivity to the A90 corridor and existing bus stops adjacent to the site. Sites such as Calderwood and Conifox have no such advantages. The site is capable of a range of mixed uses office industry research education hotel/ leisure /housing.

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

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Choice **14 B**

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

Short Response

Explanation

Choice **14 C**

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

Short Response

Explanation

Choice **15 A**

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

Short Response

Explanation

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

Supporting Info   
Email

Choice 15 B

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

Short Response

Explanation

Choice 15 C

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

Short Response

Explanation

Choice 15 D

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

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

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Choice **15 E**

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

Short Response

Explanation

Choice **15 G**

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

Short Response

Explanation

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

Supporting Info   
Email

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** Craigiehall is well located to serve the key locations at Edinburgh Park / South Gyle as well as the city centre. Allocation of the site would facilitate public transport links. Having had regard to the Commercial and Industrial Needs Studies it is clear that Craigiehall can make a valuable contribution to employment provision in the north- west of Edinburgh. The existing estate at Craigiehall already contains offices and employment land. Proposals at Craigiehall would assist in compensating for the loss of office, business and industrial office floorspace elsewhere in the city and therefore comply with the objectives of Choice 16. Craigiehall can accommodate employment uses as part of a mixed-use approach within an accessible area well served by public transport. New business space can be provided as the redevelopment of the site serving a local catchment. The delivery and redevelopment of such space will only work as part of a mixed-use approach with partnership with the MoD as part of a comprehensive plan for the whole site.

Choice 16 A2

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

Short Response

**Explanation**

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **16 A3**

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

Short Response

Explanation

Choice **16 A4**

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

Short Response

Explanation

Choice **16 A5**

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

Short Response

Explanation

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

Supporting Info   
Email

Choice 16 A5

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

Short Response

Explanation

Choice 16 B

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

Short Response

Explanation

Choice 16 C

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

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 E1

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

Short Response

Explanation

Choice 16 E2

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

Short Response

Explanation

Choice 16 E3

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

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

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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

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On behalf of:

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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:** 01749      **Response Ref:** ANON-KU2U-GWMM-Y

**Name** Stuart Szylak

**Response Type** Agent / Consultant

**On behalf of:** Hallam Land Management Limited

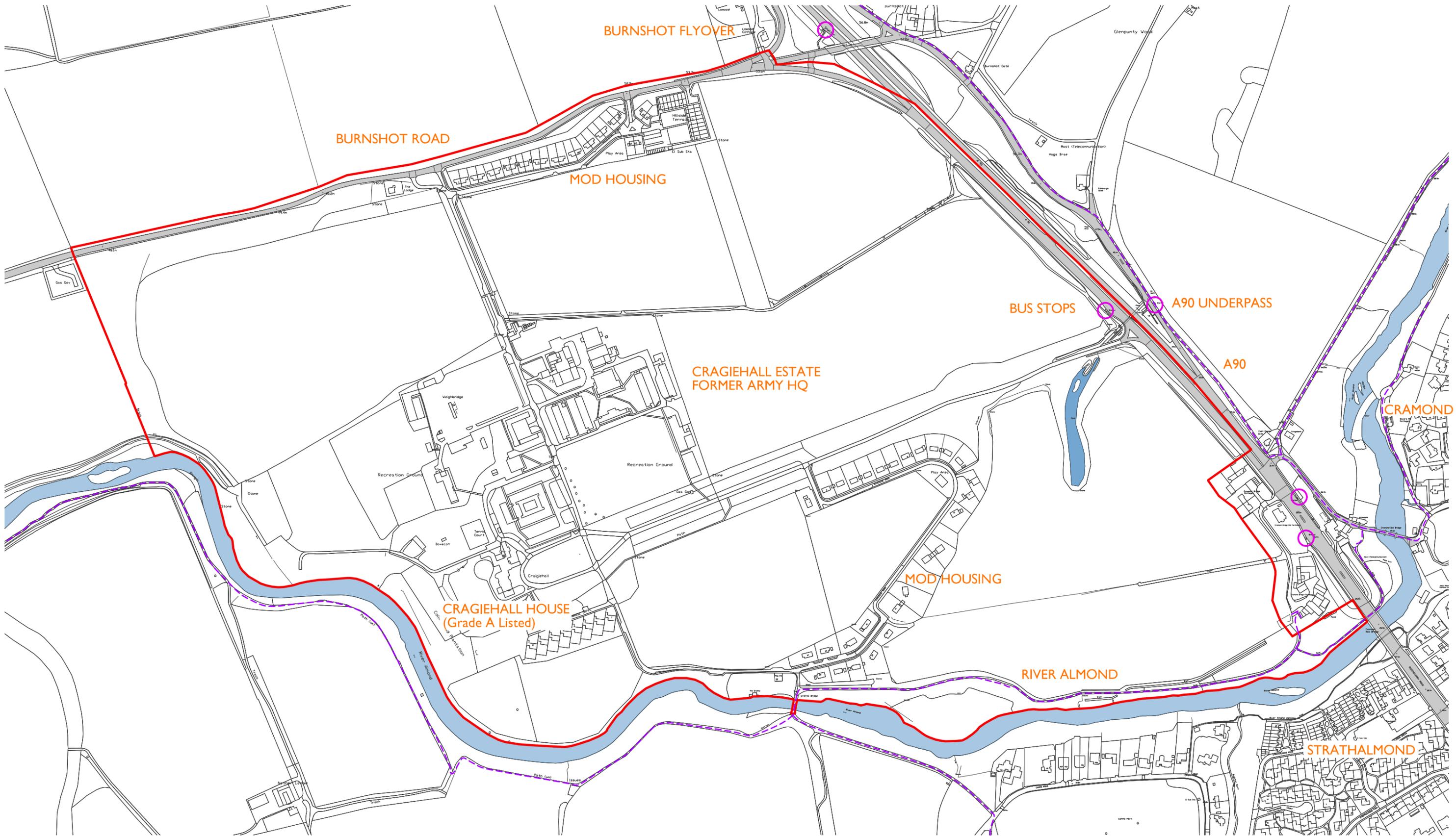
**Supporting Info**

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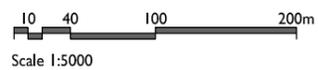
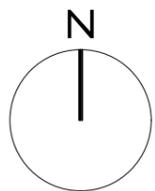
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# The Redevelopment of Cragiehall Estate, Edinburgh



# Cragiehall Village : Site Location Plan







Existing non-listed accommodation



STABLE BLOCK  
Grade B Listed



WALLED GARDEN  
Grade A Listed



DOVECOT  
Grade B Listed



CRAGIEHALL HOUSE  
Grade A Listed



Former Married Quarters



OPERATIONS BUILDING  
Grade B Listed



RADIO MAST  
Grade B Listed



SUNDIALS & GATE PIERS  
Grade A Listed

**KEY POLICY REQUIREMENTS**

- Des 1-13 Design Principles for New Development
- Env 2-4 Environmental Protection, Trees, Protected Species and Listed Buildings
- Env 7-9
- Env 12
- Env 16
- Hou 1-7 Housing and Community Facilities
- Hou 10
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- Ret 10-11 Shopping and Leisure
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- Tra 6
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- Tra 11
- RS 1 Resources and Sustainability
- RS 4
- RS 6-7

**OTHER DESIGN QUALITY REQUIREMENTS**

Creating Places  
Designing Streets  
Edinburgh Design Guidance



Underground Bunker



Former Married Quarters



Former Married Quarters

# Existing Built Features



Long tree lines street  
East to West



Long tree lines street  
North to South



Designed Landscape (Entire site)



Designed Landscape (Entire site)

**KEY POLICY REQUIREMENTS**

Historic Garden Designed Landscape  
Inventory Site

Craigiehall = Env. 7  
Green Belt = Env. 10



Mature landscape at site entrance



Woodland Walks



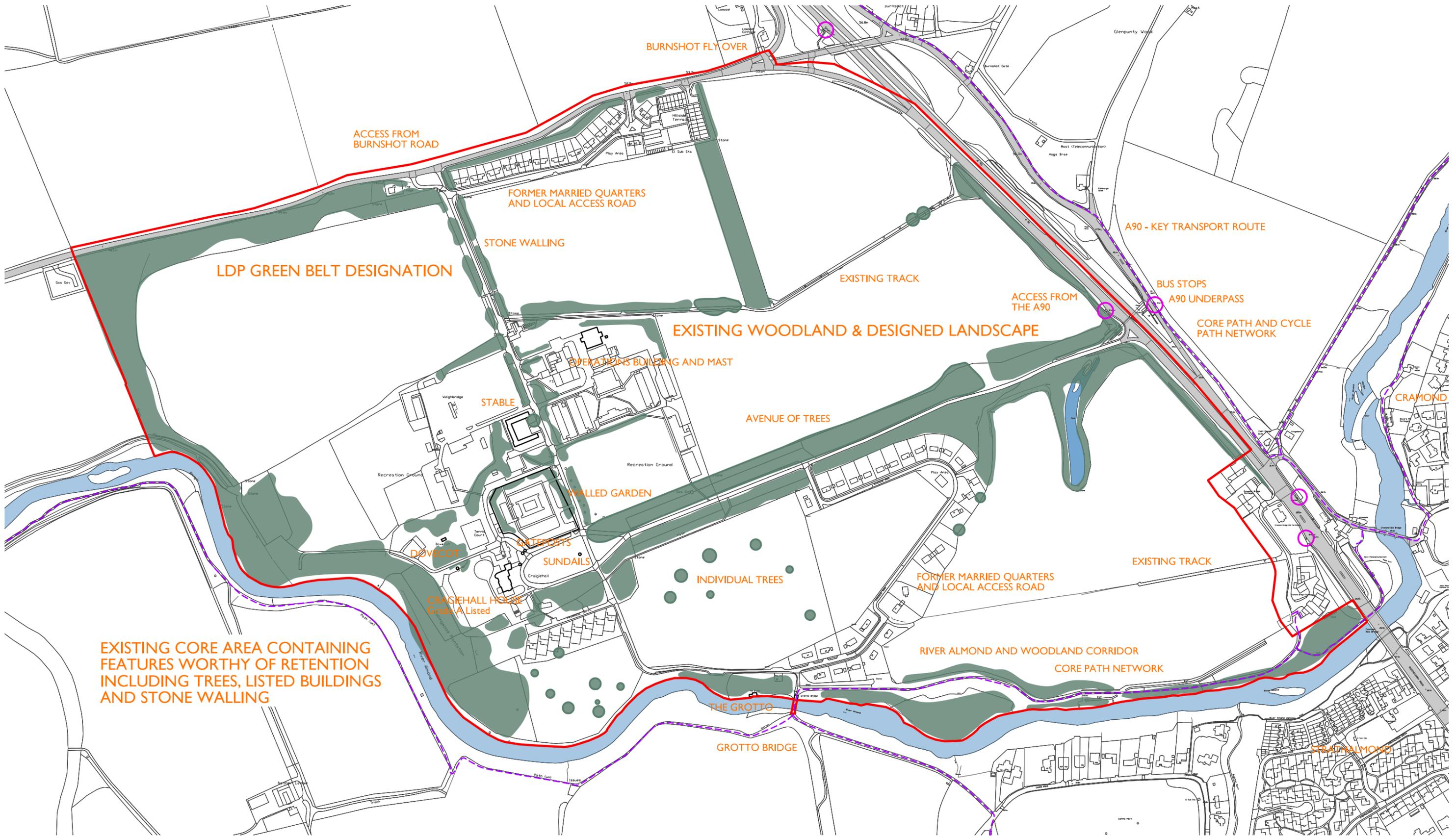
Grotto & Grotto Bridge  
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River Almond

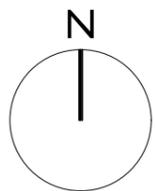
# Existing Landscape Features

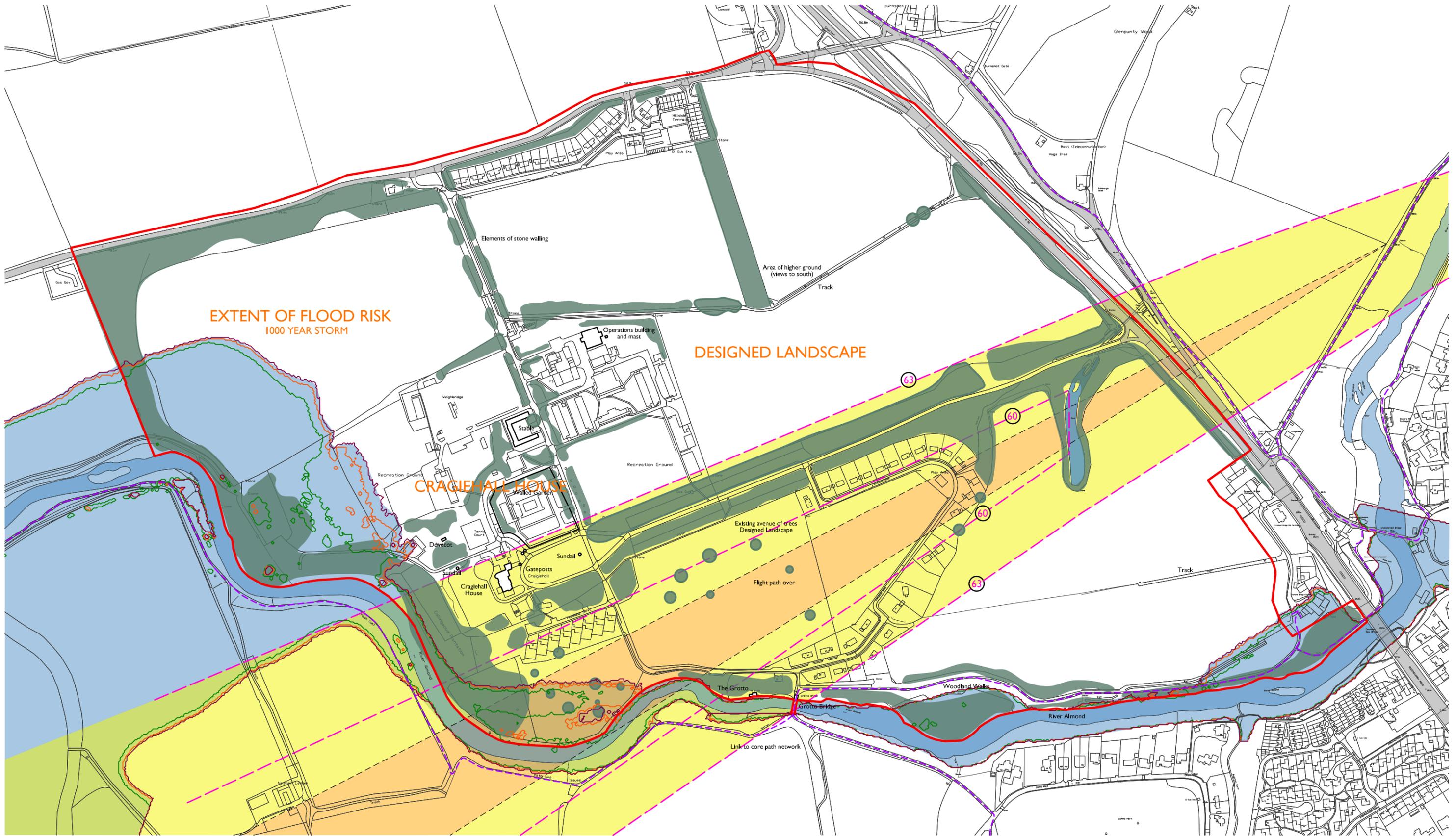




EXISTING CORE AREA CONTAINING FEATURES WORTHY OF RETENTION INCLUDING TREES, LISTED BUILDINGS AND STONE WALLING

# Existing Landscape Framework & Site Features





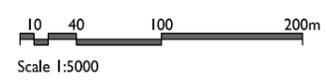
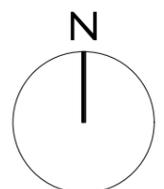
EXTENT OF FLOOD RISK  
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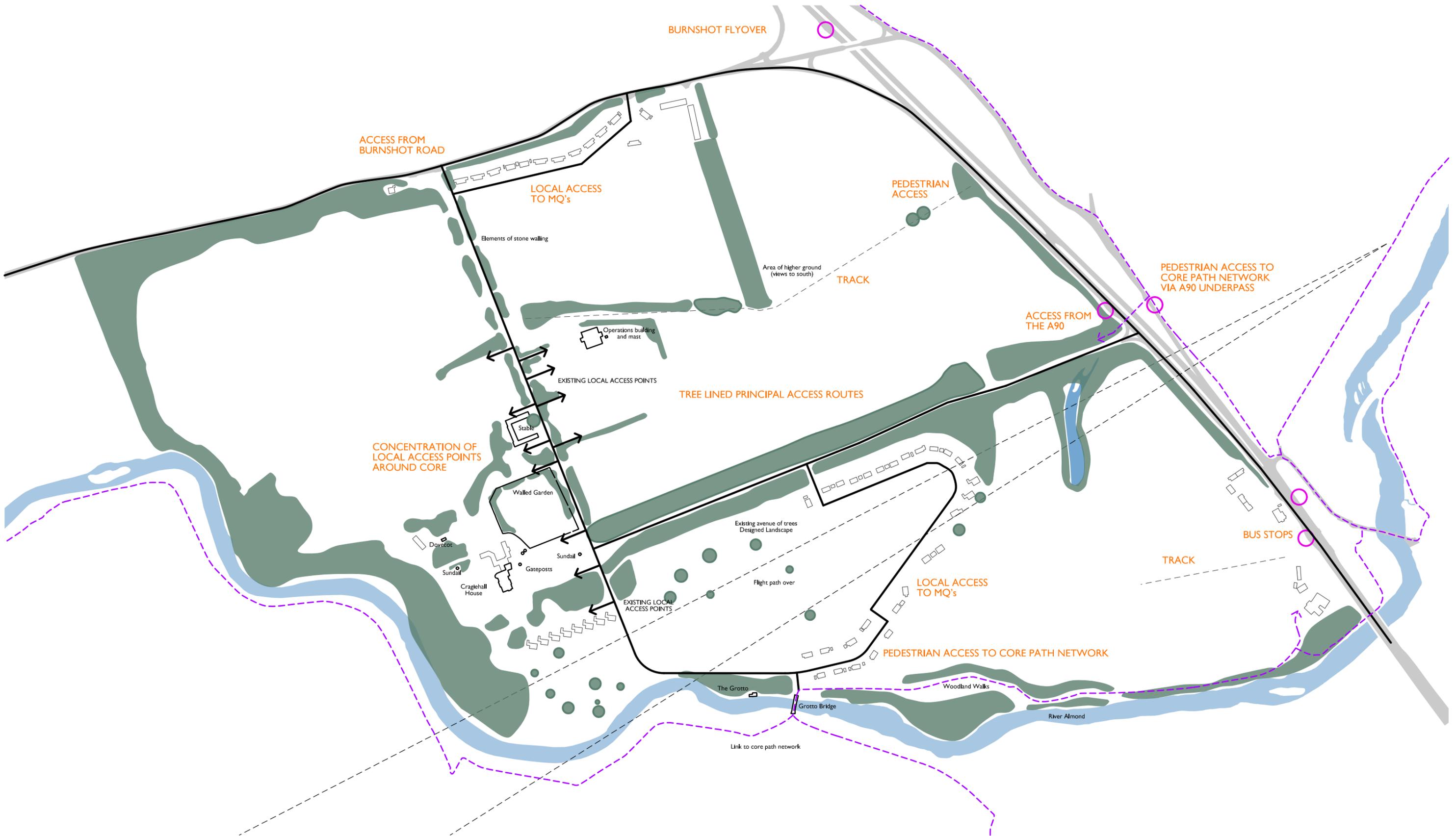
DESIGNED LANDSCAPE

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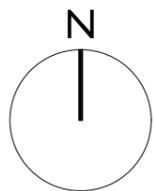
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# Flood Risk and Airport Constraints



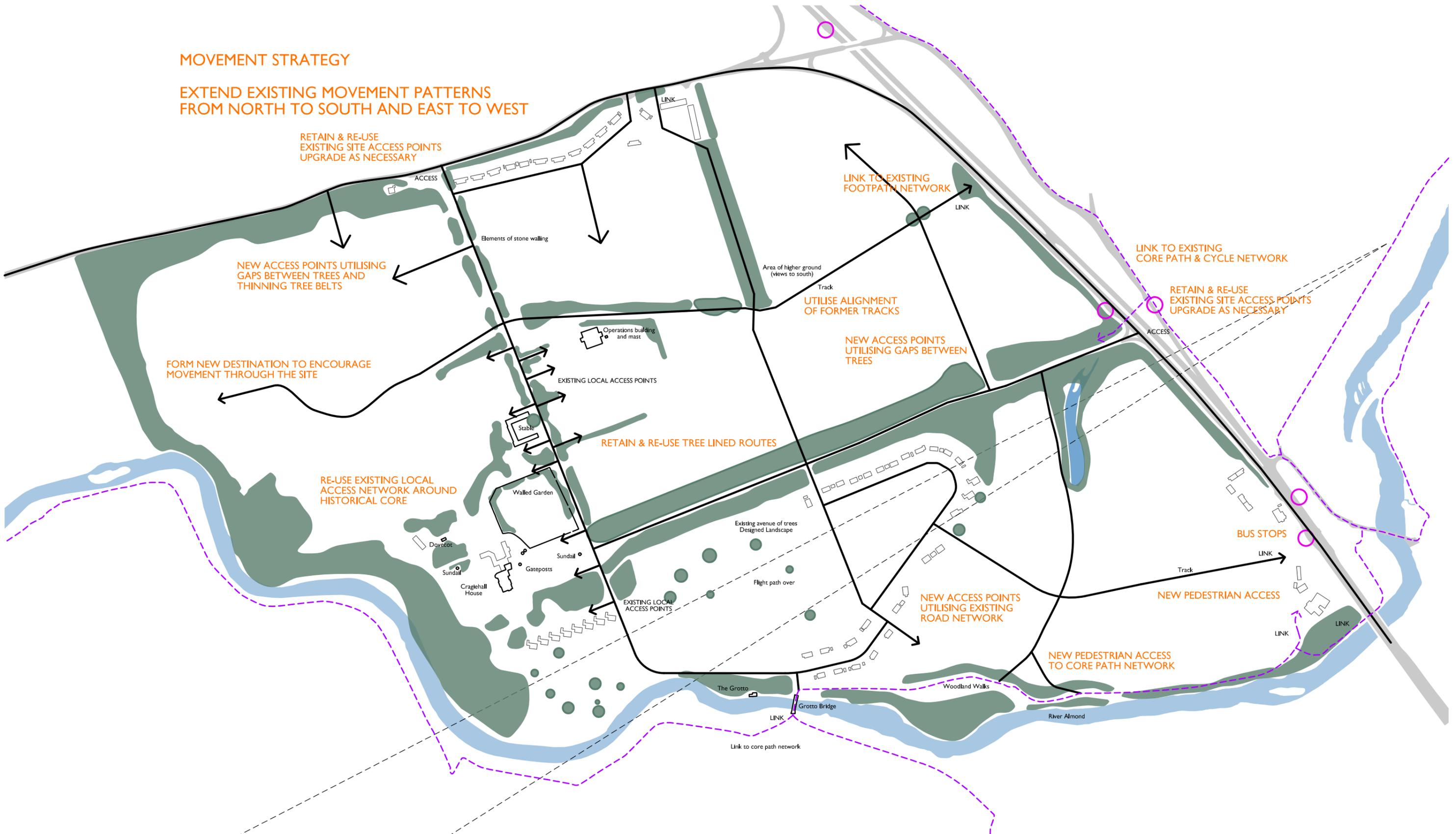


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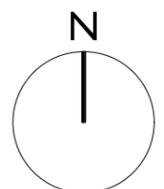


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EXTEND EXISTING MOVEMENT PATTERNS FROM NORTH TO SOUTH AND EAST TO WEST

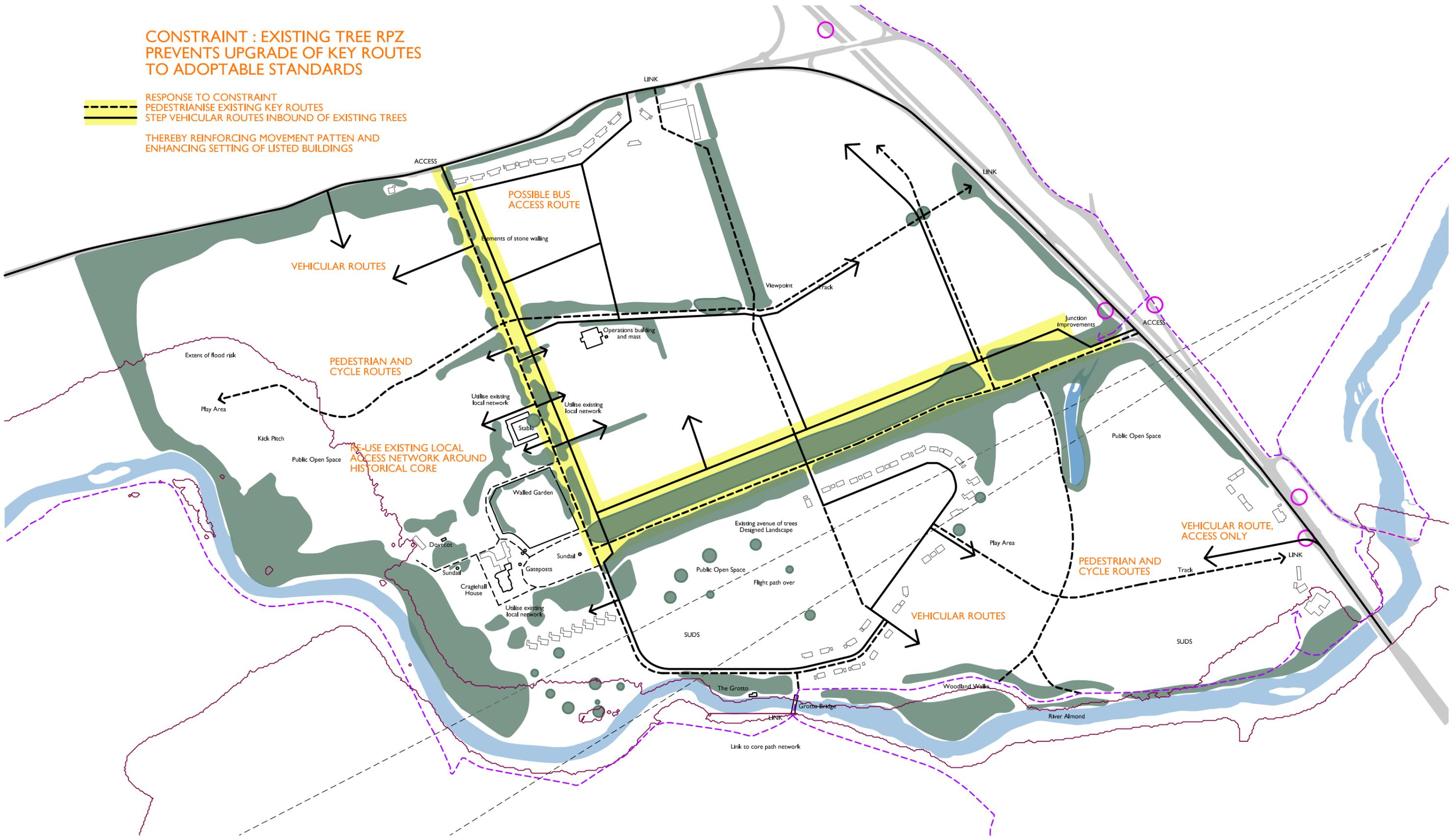


# Proposed Movement Pattern



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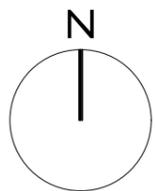
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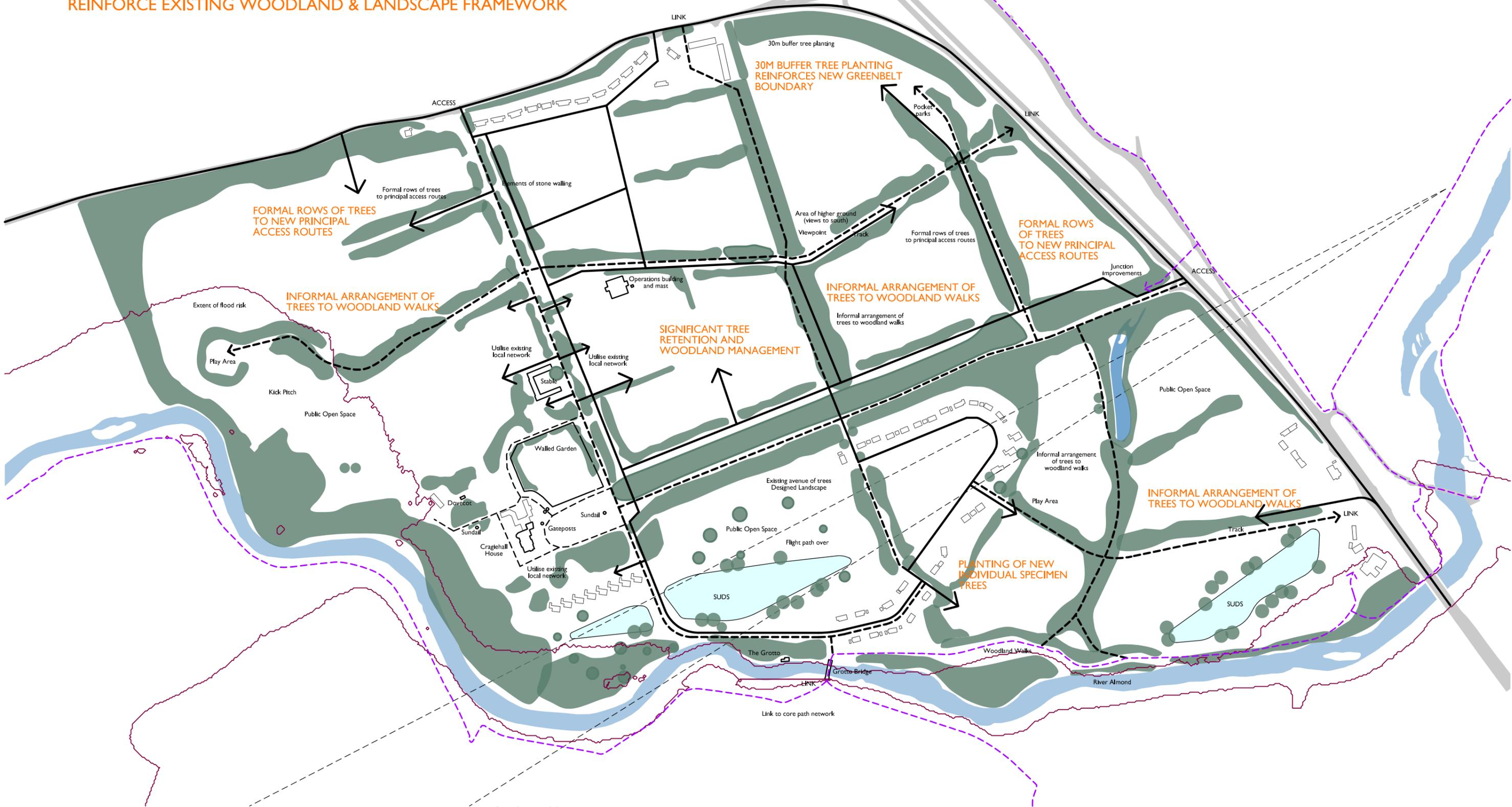
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# Proposed Movement Pattern - Designations

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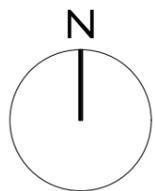


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Reinstate strong planted framework reflecting original designed landscape

### Riverside walkway

Secluded and enclosed character of riverside walkway maintained and enhanced.  
Repair and interpretation of the grotto and grotto bridge.



# Proposed Landscape Framework





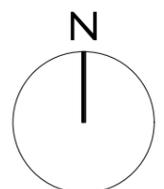
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## POTENTIAL USES INCLUDE

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- SECONDARY SCHOOL
- PARK AND RIDE FACILITY
- RETAIL SHOP / CAFE (Class 1 and Class 3)
- OFFICE (Class 2 and Class 4)
- HOTEL (Class 7)
- CARE HOME (Class 8)
- HEALTH CENTRE
- PHARMACY
- DENTAL PRACTICE



# Proposed Development Blocks in Context



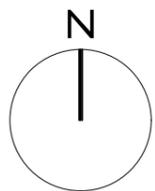
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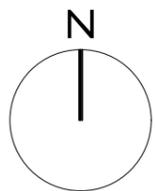


# Proposed Development Blocks on Aerial Photograph





# Proposed Development Blocks on Topographical Survey



10 40 100 200m  
Scale 1:5000

# **CRAIGIEHALL MASTERPLAN - DESIGN COMMENTARY**

## **Introduction**

The purpose of this design statement is to provide a concise commentary of the Craigiehall Masterplan as submitted as a representation to the Main Issues Report for City Plan 2032.

It has modified and refined elements of the earlier masterplan submitted for Craigiehall within the previous application submitted by Hallam Land for the Rosebery land and MoD Estate. As such it is now fully aligned with the underlying development and design objectives of City Plan.

In addition, the masterplan and layout take full account of guidance on place-making within Scottish Planning Policy, Designing Streets and the Edinburgh Design Guide.

A high quality sustainable and connected development is planned for the site. It is feasible and has the benefit of evidence submitted as part of an Environmental Assessment.

## **Townscape and Landscape Context**

The site comprises the former MOD Army HQ at Cragiehall and adjoining landholdings owned by Rosebery Estates, having a combined area around 117 Hectares. It is located approximately 5 miles to the north west of Edinburgh, on the edge of the existing residential settlements at Cramond and Strathalmond, and to the west of the A90, a key arterial transport corridor linking Edinburgh with Fife and beyond.

To the southern and south western boundaries, the site is bounded by mature woodland and the River Almond, with this landscaped corridor providing a stretch of the River Almond walkway, which is part of the core path network. To the north, the site is bounded by Burnshot Road, a minor road linking the site and Kirkliston to the A90 via the Burnshot flyover. The northern boundary also benefits from areas of mature woodland, mainly to its western extremities, and a row of married quarters associated with the former army base. To the east, the site is bounded by the A90, which also provides a number of bus stops, a pedestrian / cycle underpass and vehicular access to the site. The core path network wraps around the southern edge of the site, extending to the east and north, on the eastern side of the A90. The site is therefore accessible and provides connectivity to existing bus, footpath and cycle path networks.

A small number of cottages are located adjacent to the south eastern corner of the site, and these are located within the Cramond Conservation Area. Other local features out with the site boundary include the Cragie Farmshop and Café to the north west and the Cramond Brig restaurant (Miller and Carter) to the east of the site, with additional local facilities provided relatively close to the site at Barnton, Kirkliston, Dalmeny and South Queensferry.

It is clear that Craigiehall already benefits from a rich built and landscape environment. The Category A-Listed Craigiehall House is the focal point of the estate, standing at the end of a grand avenue of trees, some of which are protected as Ancient Woodland. There are several other historic buildings associated with the estate at Craigiehall, and these include the former stables (Category B), Dovecot (Category B), the Walled Garden (Category A), Sundails and Gate Piers (Category A), Operations Building (Category B), Radio Mast (Category B) the riverside Grotto and Grotto Bridge (Category B). The former military activities were centred upon this historical core, where a number of low quality accommodation and office blocks have been erected over time, as have a number of

married quarters to the north, off Burnshot Road, and to the south and west of the estate, served off an internal road network.

The River Almond and its banks provide a mature woodland corridor to the south of the site, which is a designated Special Landscape Area (as are the lands associated with West Cragie Farm to the west and north west of the site), with the grand avenue of trees providing a remnant of the Designed Landscape associated with the original Cragiehall House, which also includes areas of parkland and significant mature trees. The overall site contains a number of field boundaries, tree belts, individual trees and informal paths which will serve to guide design proposals.

### **Constraints and Opportunities**

The existing road network provides a physical barrier which constrains development and prevents it from heading north and east, whereas the River Almond does likewise to the south and west. Whilst there are no visual connections between the site and Edinburgh City Centre, there are some local views into the site from the east (A90) and from the north (Burnshot Road). Longer views into the site also exist from Cragie Hill and Cragiehall Temple.

The existing built and landscape environment also provides constraint, and opportunity. The historical core provides a natural mixed-use hub at the heart of the development, retaining and enhancing all of the existing listed buildings whilst presenting an opportunity to replace their poor-quality neighbours.

Existing mature landscape and remaining elements of the designed landscape provide key habitats which also constrain development in certain areas, setting development back from the edge of the site, however, it does, without doubt, add character which will enhance the new development. Such large areas of woodland will benefit from woodland management, with specific reference to areas of trees in poor condition.

Other significant constraints are presented in the form of flood risk and from Edinburgh Airports overhead flight path / acoustic restrictions, which serve to generate large no build areas within the site. However, this provides an opportunity to retain substantial areas of high-quality historic parkland, some of which could establish growing opportunities in the form of allotments or orchards.

The development also presents an opportunity to upgrade the A90 underpass and to improve pedestrian links through the site towards to the Riverside Walkway core path network, to the National Cycle Network, to local and national bus services, and to other local features like Cragie farm shop and café.

In summary, the development proposal provides opportunities to;

- Protect and enhance the historical built environment.
- Introduce a woodland management plan to protect and enhance existing woodland.
- Reinforce the existing landscape framework and policies.
- Improve a fragmented woodland edge to provide a strong green belt boundary.
- Support Active Travel plans and improve pedestrian and cycle permeability through the site.
- Support Sustainable Travel initiatives through the provision of a new 500 space Park and Ride facility and encourage the use of public transport.
- Establish a new Primary School as part of an educational campus with a potential secondary school.

- Incorporate employment and leisure opportunities on site.
- Supply market and affordable housing.
- Investigate sustainable energy / community heat and power facilities.

### **Design Concept**

Cragiehall offers a unique opportunity to provide a pedestrian friendly mixed use residential and business community with a distinct identity and a real sense of place. Nonetheless a location which is well integrated with the edge of the city and adjoining urban area as well as satellite locations. A village concept promotes sustainable lifestyle choices by providing family housing within walking distance of new employment, education and leisure facilities with easy access to modes of public transport.

The design proposal aims to reinforce an already rich built and landscape environment to provide a variety of spatial experiences that will support a vibrant public realm and to generate a coherent, structured masterplan, with a hierarchy of green spaces, streets and character zones allowing the new community to enjoy this high quality environment. There is no doubt that Cragiehall Village would be a highly attractive place in which to live and work. Design proposals hereby presented aim to respond to this historical and mature landscape setting and seek to protect and enhance the special built and landscape site features associated with the site.

### **Development and Design Principles**

Following detailed site analysis, the undernoted design principles have been established to aid the design process and to develop the Cragiehall masterplan.

- Protect and enhance existing woodland areas and the designed landscape.
- Reinststate the historic planting structure comprising tree belts and avenues of trees, to reinforce the existing landscape framework.
- Retain areas of high- quality parkland and provide areas for planting, recreation and growing.
- Protect and enhance the setting of the existing listed buildings, with specific reference to Cragiehall House and the Walled Garden.
- Observe existing field boundaries, tree belts, individual trees and informal footpath network.
- Retain existing and provide new walling and hedgerows that reflect upon the local landscape character.
- Establish a new design-led development that is centred upon the re-use of Cragiehall House and the historical core.
- Develop a legible masterplan with density graduating from the neighbourhood centre to the outlying areas to ensure sensitive integration into the wider context.
- Reinforce existing movement patterns through the site and improve pedestrian and cycle permeability.
- Provide connections to new and existing sustainable public transport facilities.

### **Gross Net Development and Density**

The design proposals should respond to their setting and provide a higher density, design-led mixed-use central core. This area provides a natural focal point and village centre for the development whilst retaining the existing listed structures and protected trees. Density

should graduate outwards from the neighbourhood centre, to the outlying areas of the site, to ensure sensitive integration with the existing environment.

Whilst the entire site extends to 117 hectares, the majority of the site will be occupied by woodland, parkland and landscaped open space. Analysis demonstrates that a redeveloped historical core in association with the proposed new development areas would extend to circa 52 hectares, which equates to 45% of the site. Initial analysis suggests that Cragiehall Village would have the capacity to deliver around 1200 new homes, of which 25% would be affordable, up to 4 hectares of commercial opportunity, a new primary school and a 500 space park and ride facility.

### **Mixed Use Neighbourhood Centre**

The historical core provides an opportunity to re-use, enhance and protect a significant number of currently redundant listed buildings at the heart of a vibrant mixed-use community, thereby generating identity and a sense of place.

Potential uses within this neighbourhood centre would include hotel, care, office, retail, café, health centre, pharmacy, a dental practice and residential. Out with the higher density core, potential land uses include residential, a park and ride facility and education, in the form of a new primary school, with opportunities too for the provision of a new secondary school.

### **Designing Streets and Edinburgh Design Guide**

Design quality is fundamental to a successful development at Cragiehall Village. This should be well designed and re-use the existing listed buildings and landscape in a sensitive and well-planned manner to establish a vibrant community providing a variety of uses and wide mix of house types.

Emerging design proposals should demonstrate best practice and accord with Edinburgh Design Guidance and Creating Places, demonstrating the six qualities attributed to successful placemaking, namely;

- Safe and Pleasant
- Distinctive
- Easy to move around
- Attractive and Welcoming
- Resource efficient
- Adaptable

### **Concluding Statement**

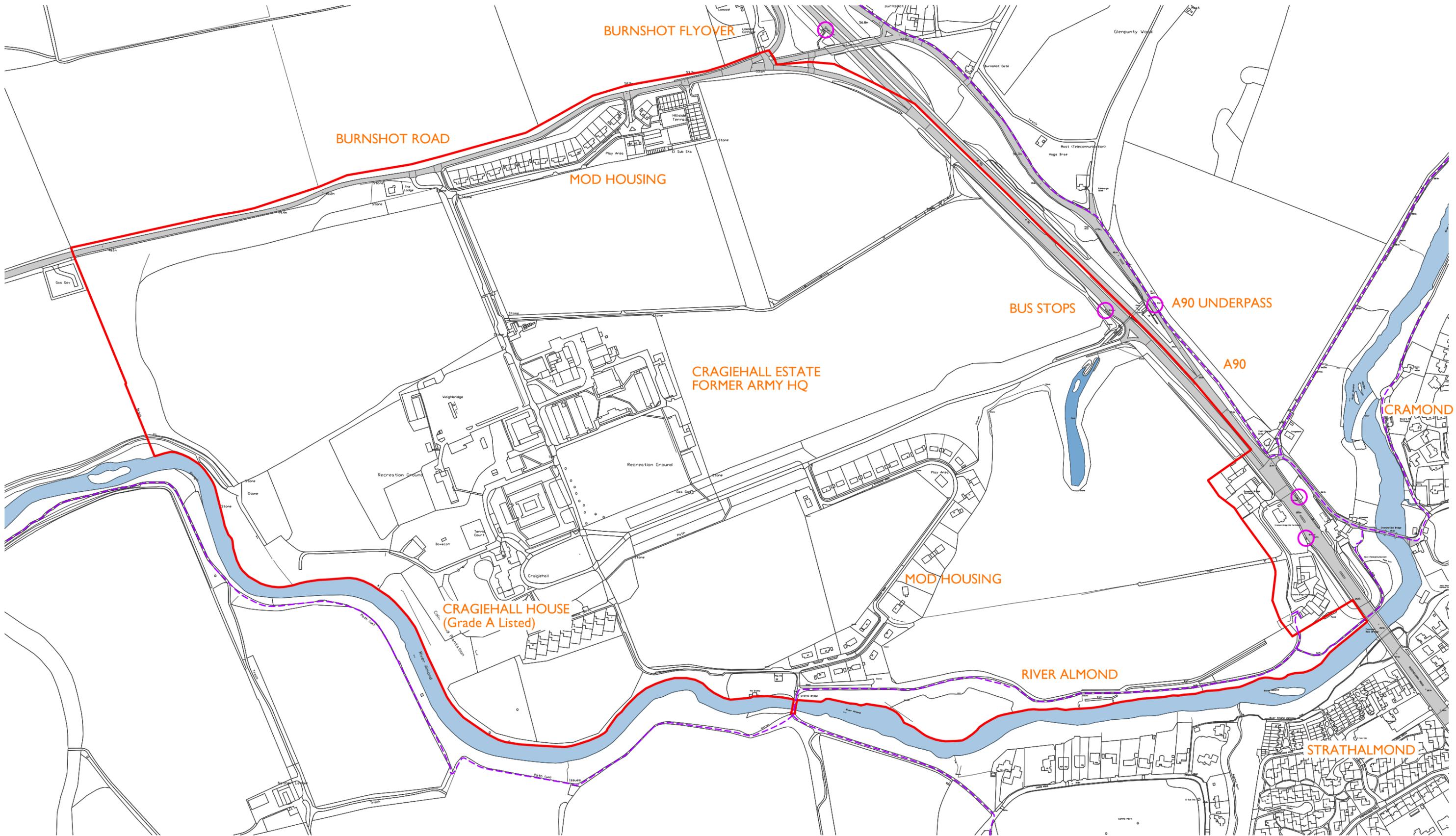
The Craigiehall Masterplan provides a feasible and viable development framework which responds to the objectives of City Plan and is aligned with the development and design guidance issued by the City Council. It makes the most effective use of both brownfield and greenfield land in a sustainable and accessible location

It forms a basis for further discussions with the Council and the community on a range of technical and design matters potentially as part of a Local Place Plan. Importantly the design integrates with the local landscape and townscape as well as contributing to conservation and restoration of the built heritage and environment.

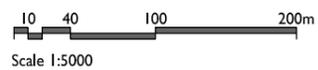
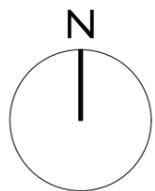
The scale of development and density envisaged allows a valuable contribution to infrastructure and community facilities as part of a mixed-use neighbourhood hub.

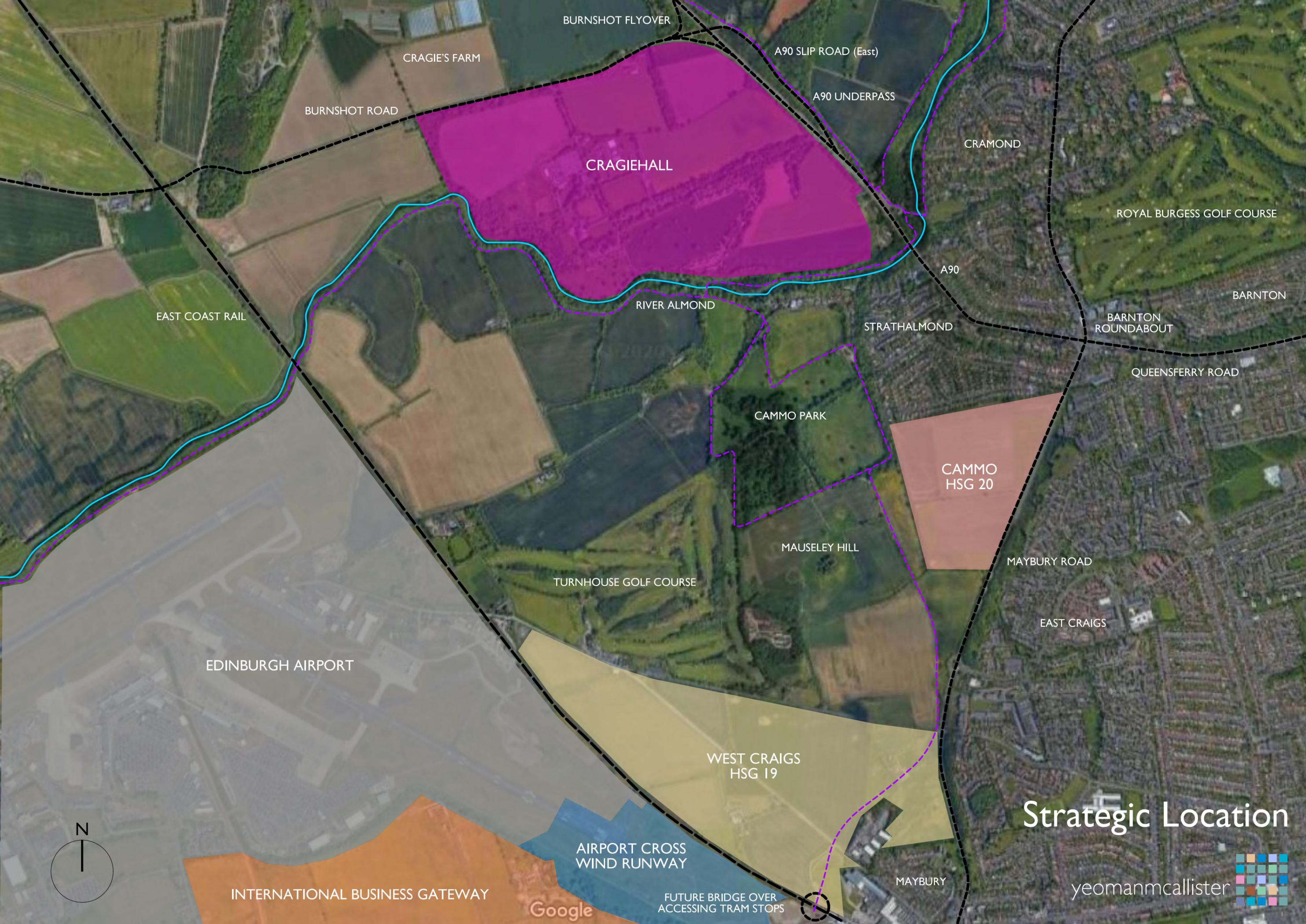


# The Redevelopment of Cragiehall Estate, Edinburgh



# Cragiehall Village : Site Location Plan





BURNSHOT FLYOVER

CRAIGIE'S FARM

A90 SLIP ROAD (East)

A90 UNDERPASS

BURNSHOT ROAD

CRAMOND

CRAGIEHALL

ROYAL BURGESS GOLF COURSE

EAST COAST RAIL

RIVER ALMOND

A90

BARNTON

BARNTON ROUNDABOUT

STRATHALMOND

QUEENSFERRY ROAD

CAMMO PARK

CAMMO HSG 20

MAUSELEY HILL

MAYBURY ROAD

TURNHOUSE GOLF COURSE

EDINBURGH AIRPORT

EAST CRAIGS

WEST CRAIGS HSG 19

AIRPORT CROSS WIND RUNWAY

MAYBURY

# Strategic Location

INTERNATIONAL BUSINESS GATEWAY

Google

FUTURE BRIDGE OVER ACCESSING TRAM STOPS

yeomanmcallister





Existing non-listed accommodation



STABLE BLOCK  
Grade B Listed



WALLED GARDEN  
Grade A Listed



DOVECOT  
Grade B Listed



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Former Married Quarters



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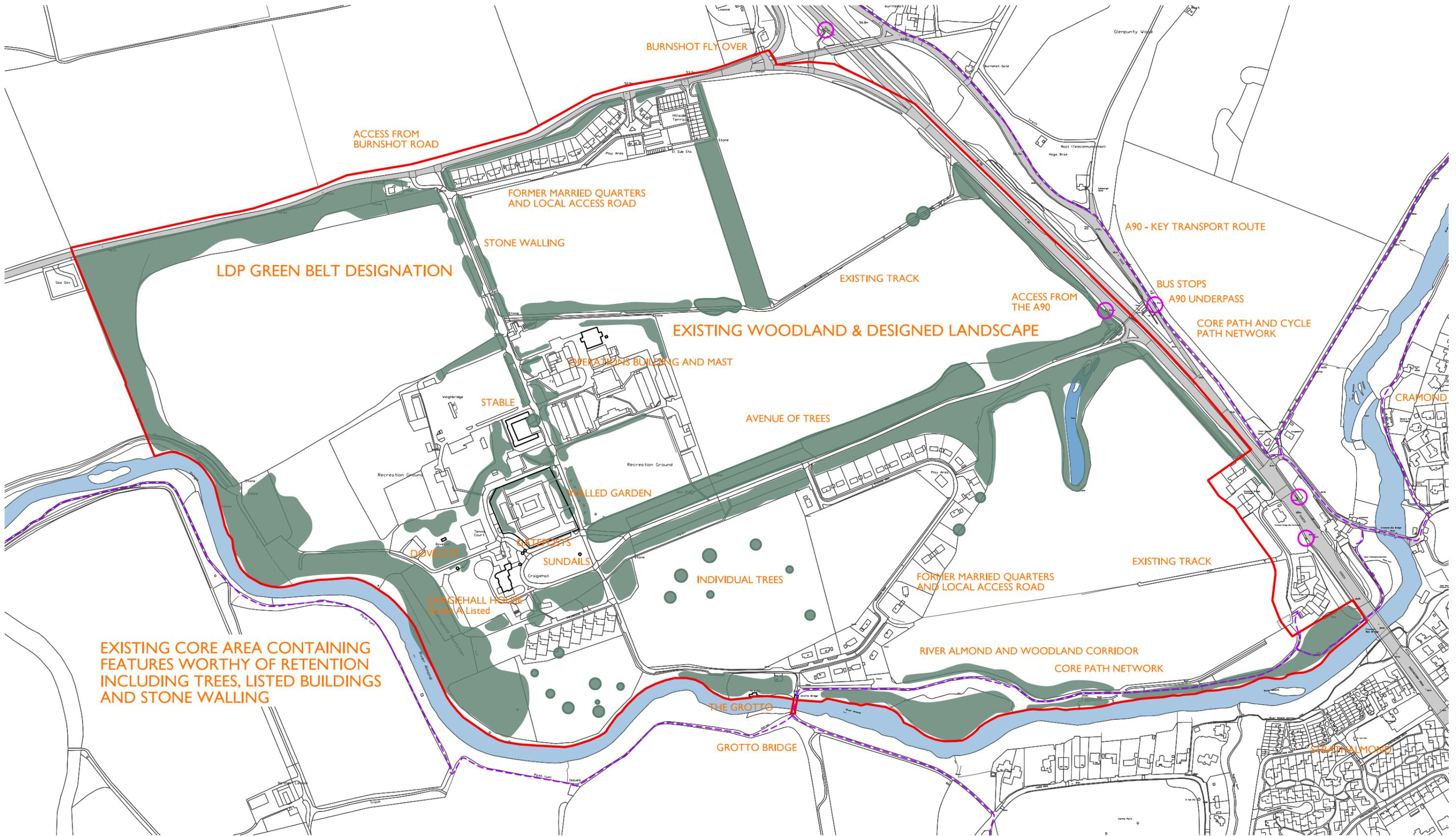


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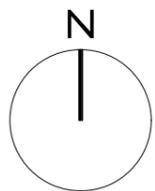


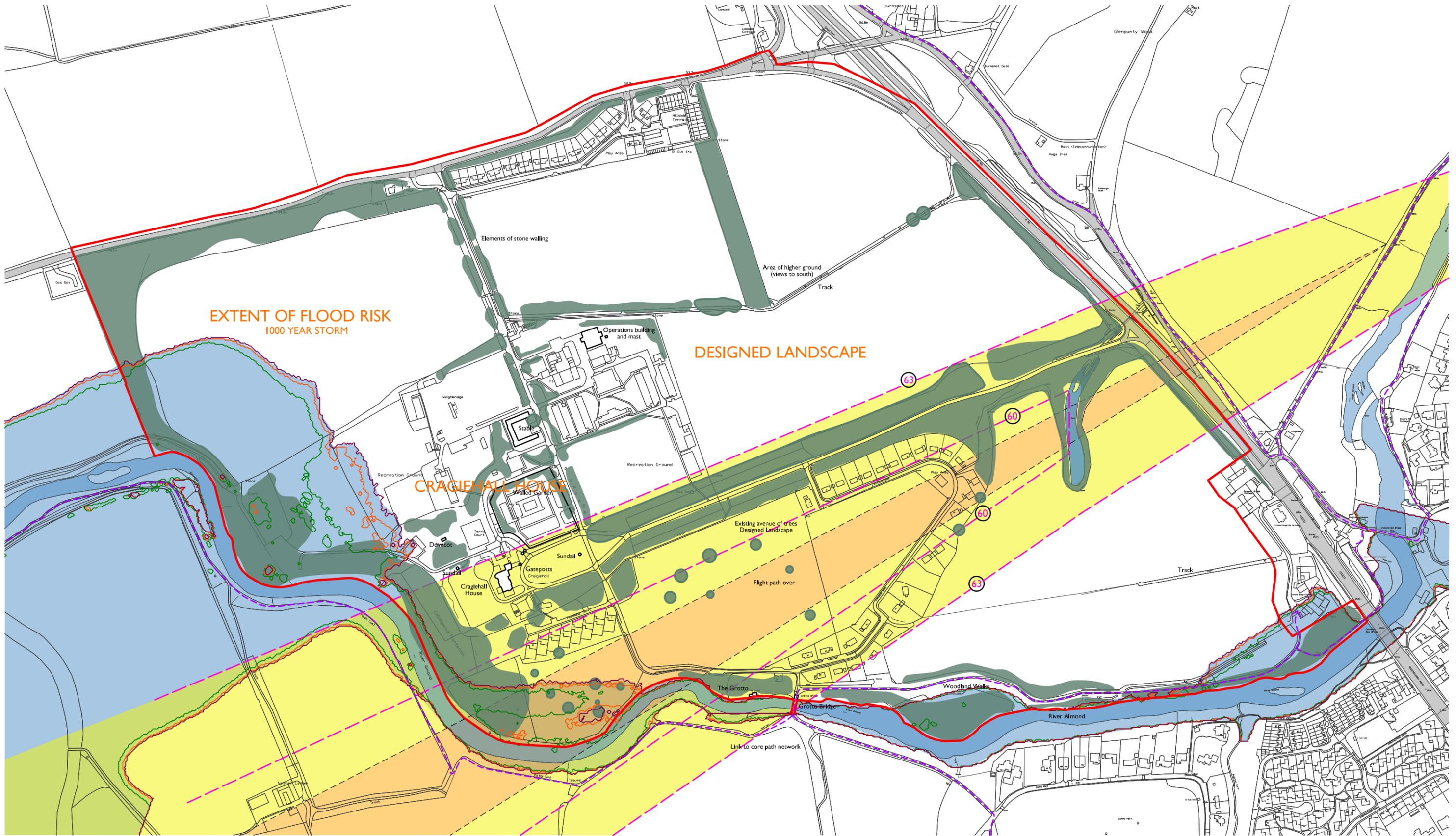
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# Existing Landscape Features



# Existing Landscape Framework & Site Features





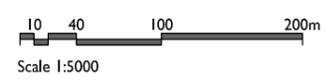
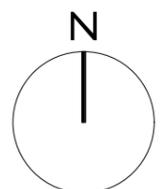
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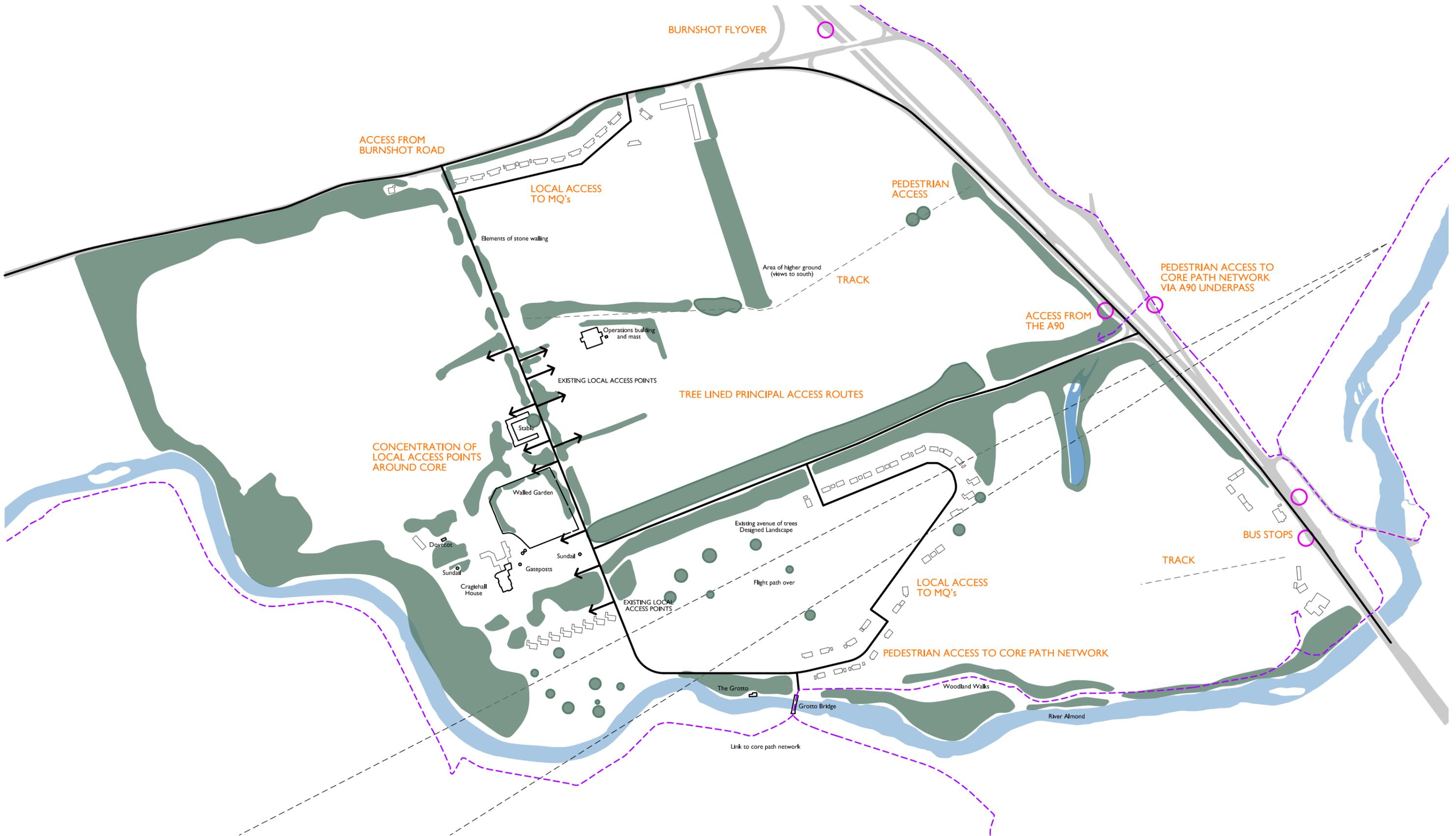
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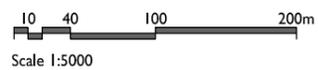
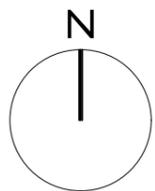
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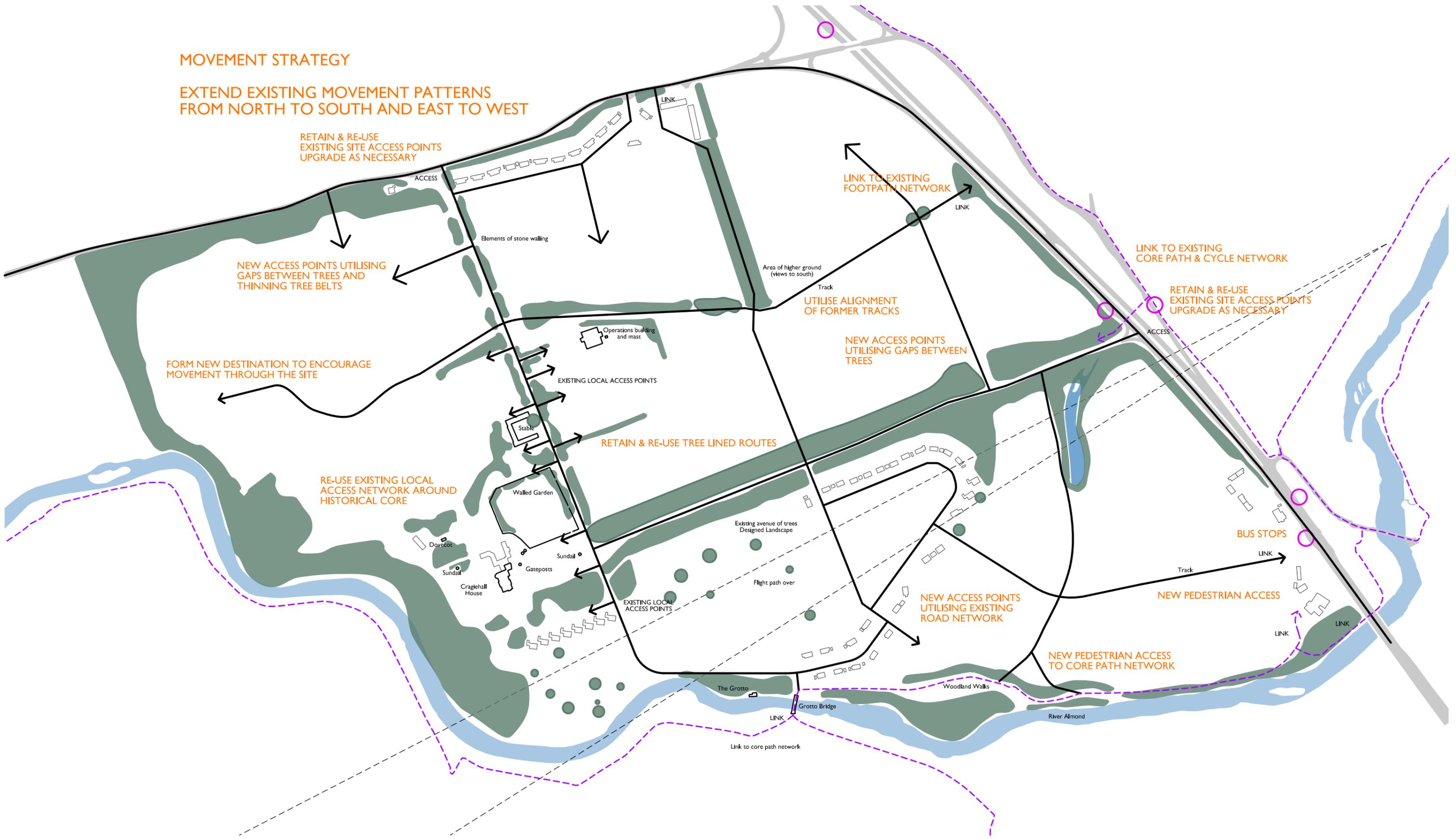


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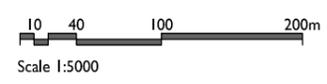
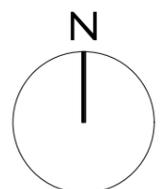


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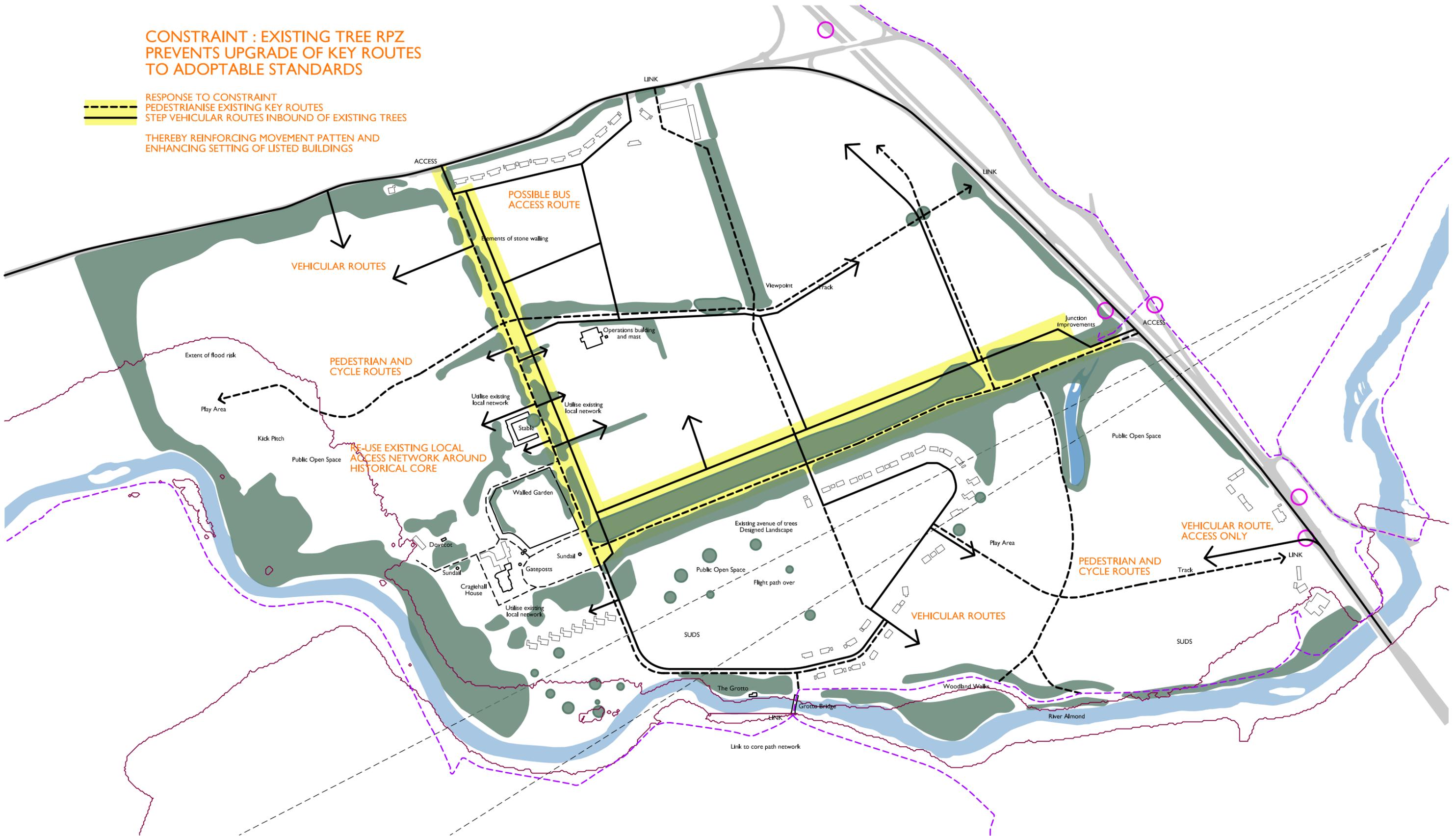


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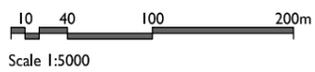
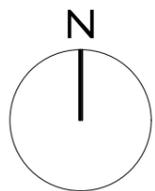
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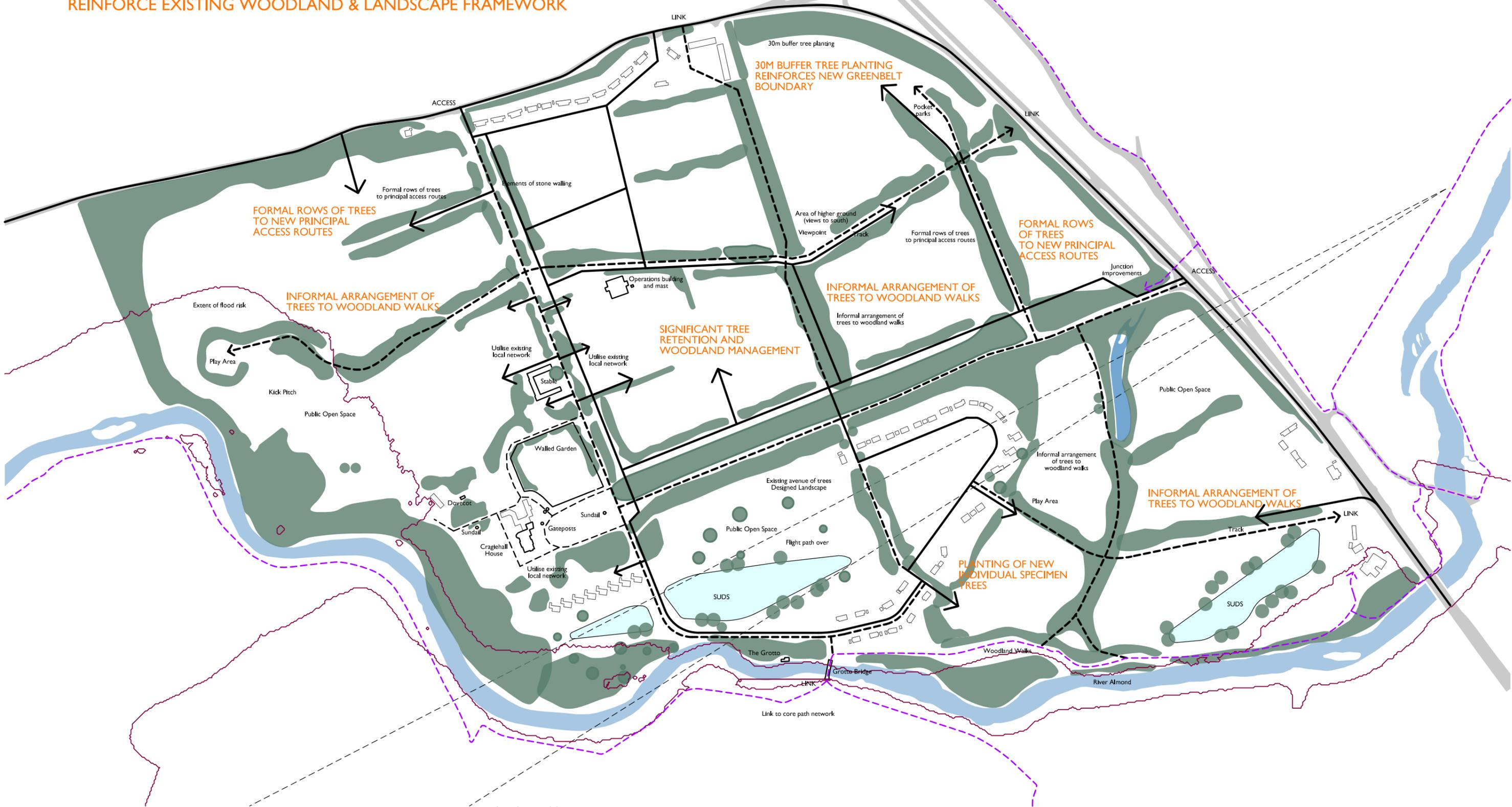
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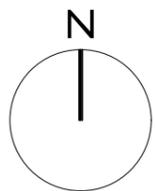


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Secluded and enclosed character of riverside walkway maintained and enhanced.  
Repair and interpretation of the grotto and grotto bridge.

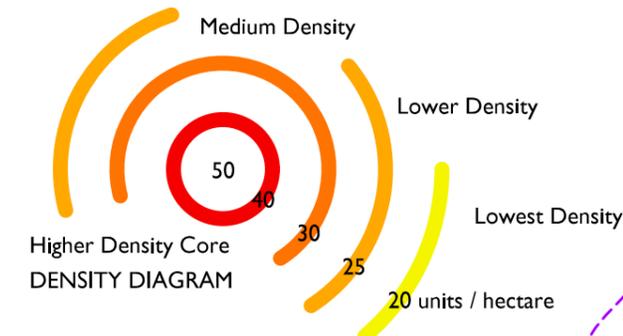


# Proposed Landscape Framework

# SUGGESTED MIXED USE DEVELOPMENT BLOCKS BASED UPON A NEW GRID

## POTENTIAL USES INCLUDE

- RESIDENTIAL
- PRIMARY SCHOOL
- SECONDARY SCHOOL
- PARK AND RIDE FACILITY
- RETAIL SHOP / CAFE (Class 1 and Class 3)
- OFFICE (Class 2 and Class 4)
- HOTEL (Class 7)
- CARE HOME (Class 8)
- HEALTH CENTRE
- PHARMACY
- DENTAL PRACTICE



## LEGEND

- RESIDENTIAL  
GDA around 30 Hectares
- RESIDENTIAL (MOD LAND)  
GDA around 5.3 Hectares
- AFFORDABLE RESIDENTIAL  
GDA around 9.3 Hectares
- HISTORICAL CORE & NEIGHBOURHOOD CENTRE  
GDA around 2.7 Hectares
- COMMERCIAL AREA  
GDA around 1.0 Hectares
- PRIMARY SCHOOL SITE  
GDA around 2 Hectares
- PARK AND RIDE  
GDA around 1.5 Hectares
- POSSIBLE SECONDARY SCHOOL SITE

**Cragiehall House**  
Long term viable reuse with minimal level of changes. Potential for demolition of 1950s extensions. Remodel and restore original roof form. Maintain key views to and from the house.

**Other Listed Buildings**  
Repair and re-roof the dovecot.  
Repair and interpretation of the grotto and grotto bridge.  
Stable block - Long term viable reuse with minimal level of changes.  
Operations room and mast - Long term viable reuse with minimal level of changes.

# Proposed Development Blocks



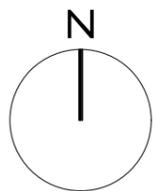
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# Proposed Development Blocks on Aerial Photograph





# **CRAIGIEHALL MASTERPLAN - DESIGN COMMENTARY**

## **Introduction**

The purpose of this design statement is to provide a concise commentary of the Craigiehall Masterplan as submitted as a representation to the Main Issues Report for City Plan 2032.

It has modified and refined elements of the earlier masterplan submitted for Craigiehall within the previous application submitted by Hallam Land for the Rosebery land and MoD Estate. As such it is now fully aligned with the underlying development and design objectives of City Plan.

In addition, the masterplan and layout take full account of guidance on place-making within Scottish Planning Policy, Designing Streets and the Edinburgh Design Guide.

A high quality sustainable and connected development is planned for the site. It is feasible and has the benefit of evidence submitted as part of an Environmental Assessment.

## **Townscape and Landscape Context**

The site comprises the former MOD Army HQ at Cragiehall and adjoining landholdings owned by Rosebery Estates, having a combined area around 117 Hectares. It is located approximately 5 miles to the north west of Edinburgh, on the edge of the existing residential settlements at Cramond and Strathalmond, and to the west of the A90, a key arterial transport corridor linking Edinburgh with Fife and beyond.

To the southern and south western boundaries, the site is bounded by mature woodland and the River Almond, with this landscaped corridor providing a stretch of the River Almond walkway, which is part of the core path network. To the north, the site is bounded by Burnshot Road, a minor road linking the site and Kirkliston to the A90 via the Burnshot flyover. The northern boundary also benefits from areas of mature woodland, mainly to its western extremities, and a row of married quarters associated with the former army base. To the east, the site is bounded by the A90, which also provides a number of bus stops, a pedestrian / cycle underpass and vehicular access to the site. The core path network wraps around the southern edge of the site, extending to the east and north, on the eastern side of the A90. The site is therefore accessible and provides connectivity to existing bus, footpath and cycle path networks.

A small number of cottages are located adjacent to the south eastern corner of the site, and these are located within the Cramond Conservation Area. Other local features out with the site boundary include the Cragie Farmshop and Café to the north west and the Cramond Brig restaurant (Miller and Carter) to the east of the site, with additional local facilities provided relatively close to the site at Barnton, Kirkliston, Dalmeny and South Queensferry.

It is clear that Craigiehall already benefits from a rich built and landscape environment. The Category A-Listed Craigiehall House is the focal point of the estate, standing at the end of a grand avenue of trees, some of which are protected as Ancient Woodland. There are several other historic buildings associated with the estate at Craigiehall, and these include the former stables (Category B), Dovecot (Category B), the Walled Garden (Category A), Sundails and Gate Piers (Category A), Operations Building (Category B), Radio Mast (Category B) the riverside Grotto and Grotto Bridge (Category B). The former military activities were centred upon this historical core, where a number of low quality accommodation and office blocks have been erected over time, as have a number of

married quarters to the north, off Burnshot Road, and to the south and west of the estate, served off an internal road network.

The River Almond and its banks provide a mature woodland corridor to the south of the site, which is a designated Special Landscape Area (as are the lands associated with West Cragie Farm to the west and north west of the site), with the grand avenue of trees providing a remnant of the Designed Landscape associated with the original Cragiehall House, which also includes areas of parkland and significant mature trees. The overall site contains a number of field boundaries, tree belts, individual trees and informal paths which will serve to guide design proposals.

### **Constraints and Opportunities**

The existing road network provides a physical barrier which constrains development and prevents it from heading north and east, whereas the River Almond does likewise to the south and west. Whilst there are no visual connections between the site and Edinburgh City Centre, there are some local views into the site from the east (A90) and from the north (Burnshot Road). Longer views into the site also exist from Cragie Hill and Cragiehall Temple.

The existing built and landscape environment also provides constraint, and opportunity. The historical core provides a natural mixed-use hub at the heart of the development, retaining and enhancing all of the existing listed buildings whilst presenting an opportunity to replace their poor-quality neighbours.

Existing mature landscape and remaining elements of the designed landscape provide key habitats which also constrain development in certain areas, setting development back from the edge of the site, however, it does, without doubt, add character which will enhance the new development. Such large areas of woodland will benefit from woodland management, with specific reference to areas of trees in poor condition.

Other significant constraints are presented in the form of flood risk and from Edinburgh Airports overhead flight path / acoustic restrictions, which serve to generate large no build areas within the site. However, this provides an opportunity to retain substantial areas of high-quality historic parkland, some of which could establish growing opportunities in the form of allotments or orchards.

The development also presents an opportunity to upgrade the A90 underpass and to improve pedestrian links through the site towards to the Riverside Walkway core path network, to the National Cycle Network, to local and national bus services, and to other local features like Cragie farm shop and café.

In summary, the development proposal provides opportunities to;

- Protect and enhance the historical built environment.
- Introduce a woodland management plan to protect and enhance existing woodland.
- Reinforce the existing landscape framework and policies.
- Improve a fragmented woodland edge to provide a strong green belt boundary.
- Support Active Travel plans and improve pedestrian and cycle permeability through the site.
- Support Sustainable Travel initiatives through the provision of a new 500 space Park and Ride facility and encourage the use of public transport.
- Establish a new Primary School as part of an educational campus with a potential secondary school.

- Incorporate employment and leisure opportunities on site.
- Supply market and affordable housing.
- Investigate sustainable energy / community heat and power facilities.

### **Design Concept**

Cragiehall offers a unique opportunity to provide a pedestrian friendly mixed use residential and business community with a distinct identity and a real sense of place. Nonetheless a location which is well integrated with the edge of the city and adjoining urban area as well as satellite locations. A village concept promotes sustainable lifestyle choices by providing family housing within walking distance of new employment, education and leisure facilities with easy access to modes of public transport.

The design proposal aims to reinforce an already rich built and landscape environment to provide a variety of spatial experiences that will support a vibrant public realm and to generate a coherent, structured masterplan, with a hierarchy of green spaces, streets and character zones allowing the new community to enjoy this high quality environment. There is no doubt that Cragiehall Village would be a highly attractive place in which to live and work. Design proposals hereby presented aim to respond to this historical and mature landscape setting and seek to protect and enhance the special built and landscape site features associated with the site.

### **Development and Design Principles**

Following detailed site analysis, the undernoted design principles have been established to aid the design process and to develop the Cragiehall masterplan.

- Protect and enhance existing woodland areas and the designed landscape.
- Reinststate the historic planting structure comprising tree belts and avenues of trees, to reinforce the existing landscape framework.
- Retain areas of high- quality parkland and provide areas for planting, recreation and growing.
- Protect and enhance the setting of the existing listed buildings, with specific reference to Cragiehall House and the Walled Garden.
- Observe existing field boundaries, tree belts, individual trees and informal footpath network.
- Retain existing and provide new walling and hedgerows that reflect upon the local landscape character.
- Establish a new design-led development that is centred upon the re-use of Cragiehall House and the historical core.
- Develop a legible masterplan with density graduating from the neighbourhood centre to the outlying areas to ensure sensitive integration into the wider context.
- Reinforce existing movement patterns through the site and improve pedestrian and cycle permeability.
- Provide connections to new and existing sustainable public transport facilities.

### **Gross Net Development and Density**

The design proposals should respond to their setting and provide a higher density, design-led mixed-use central core. This area provides a natural focal point and village centre for the development whilst retaining the existing listed structures and protected trees. Density

should graduate outwards from the neighbourhood centre, to the outlying areas of the site, to ensure sensitive integration with the existing environment.

Whilst the entire site extends to 117 hectares, the majority of the site will be occupied by woodland, parkland and landscaped open space. Analysis demonstrates that a redeveloped historical core in association with the proposed new development areas would extend to circa 52 hectares, which equates to 45% of the site. Initial analysis suggests that Cragiehall Village would have the capacity to deliver around 1200 new homes, of which 25% would be affordable, up to 4 hectares of commercial opportunity, a new primary school and a 500 space park and ride facility.

### **Mixed Use Neighbourhood Centre**

The historical core provides an opportunity to re-use, enhance and protect a significant number of currently redundant listed buildings at the heart of a vibrant mixed-use community, thereby generating identity and a sense of place.

Potential uses within this neighbourhood centre would include hotel, care, office, retail, café, health centre, pharmacy, a dental practice and residential. Out with the higher density core, potential land uses include residential, a park and ride facility and education, in the form of a new primary school, with opportunities too for the provision of a new secondary school.

### **Designing Streets and Edinburgh Design Guide**

Design quality is fundamental to a successful development at Cragiehall Village. This should be well designed and re-use the existing listed buildings and landscape in a sensitive and well-planned manner to establish a vibrant community providing a variety of uses and wide mix of house types.

Emerging design proposals should demonstrate best practice and accord with Edinburgh Design Guidance and Creating Places, demonstrating the six qualities attributed to successful placemaking, namely;

- Safe and Pleasant
- Distinctive
- Easy to move around
- Attractive and Welcoming
- Resource efficient
- Adaptable

### **Concluding Statement**

The Craigiehall Masterplan provides a feasible and viable development framework which responds to the objectives of City Plan and is aligned with the development and design guidance issued by the City Council. It makes the most effective use of both brownfield and greenfield land in a sustainable and accessible location

It forms a basis for further discussions with the Council and the community on a range of technical and design matters potentially as part of a Local Place Plan. Importantly the design integrates with the local landscape and townscape as well as contributing to conservation and restoration of the built heritage and environment.

The scale of development and density envisaged allows a valuable contribution to infrastructure and community facilities as part of a mixed-use neighbourhood hub.

## **Representation to Choices for City Plan 2030**

### **Introduction and Context**

- 1.1 RFA Development Planning is appointed by Hallam Land Management Limited to respond to the 16 Choices for City Plan 2030, published in January 2020. This submission is made in conjunction with the promotion of land for allocation as a housing led mixed-use development at Craigiehall, West Edinburgh.
- 1.2 Craigiehall benefits from having been fully considered by CEC as a planning application Ref 18/10545/PPP prior to being withdrawn in favour of the LDP2 City Plan 2030 process. The representation made effectively constitutes an objection to the LDP Choices Report in respect of Choice 12 and draws on detailed evidence to justify its allocation as the right development in the right place.
- 1.3 The context for this representation includes reference to:
  - LDP 1 Examination;
  - Planning Application Ref 18/10545/PPP
  - Implementation of Planning Scotland Act 2019;
  - Approval of the CLEUD for housing;
  - Expansion of Edinburgh Airport;
  - Closure of Craigiehall Barracks as an active Army Base;
  - Report of Examination for SESPlan 2;
  - Rejection of SESPlan 2 by Scottish Ministers; and
  - Reports and Papers in respect of HNDA 2015 and Housing Land (June and September 2019).
- 1.4 In addition, a meeting on Craigiehall was held with the City Plan 2030 team in November 2019 to assess the potential for Craigiehall. The outcomes of the meeting have largely been excluded from detailed consideration of the site assessment and related tables in respect of reviewing the existing LDP Policy1 Housing.
- 1.5 This representation responds to the Choices Report consultation and makes recommendations in respect of the Proposed City Plan 2030 which is expected in August 2020. The reasons for bringing the LDP forward at this point in time is not entirely apparent and the basis for setting housing supply targets and related policies is largely unjustified. In addition, there are inconsistencies in the background reports and the West Edinburgh Study is not available for

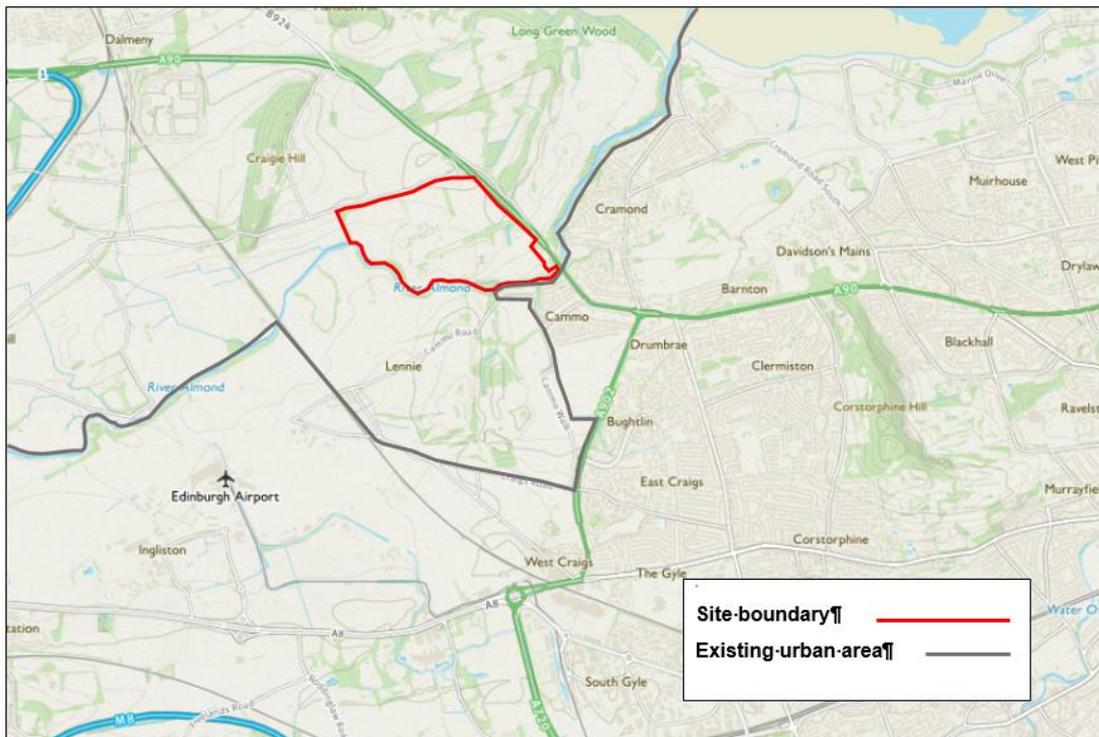
comment thereby making proper planning consideration of Choice 12 Housing and Choice 14 Delivering West Edinburgh impossible.

- 1.6 In progressing this exercise, we respond directly to the Preferred Choices in the LDP and comment on the background assessments and evaluation where relevant. We also take the opportunity to re-work the tables and figures where required in order to make these more representative of accurate evidence. We refer to supporting evidence provided by Homes for Scotland in this regard rather than reliance on the existing SDP and HNDA2.
- 1.7 A revised masterplan is also submitted for consideration demonstrating how the site can be feasibly and viably developed as an integrated and natural extension to the city meeting the key objectives of the LDP. This is particularly in relation to climate change, reducing commuting, providing affordable housing (35%), and contributing to infrastructure development and economic growth in West Edinburgh. This is presented under Choice12 with accompanying commentary indicating modifications and refinements to the previous version.
- 1.8 The representation like previous application includes land owned by the MoD at Craigiehall and it is intended that the two landowners would work in partnership to maximise development potential on the existing land and infrastructure available. Joint working arrangements are being pursued across a comprehensive allocation including the barracks site.

## **Site Location and Description**

- 1.9 The location of the site is identified in Figure1 below. It is clearly identified within the greenfield assessment of the Housing Study used to inform Choice 12. Despite being partially brownfield it is excluded from the housing capacity study.
- 1.10 The site incorporates 'Craigiehall Barracks' which is now vacated by the Ministry of Defence (MoD). Surrounding farmland is owned by the Rosebery Estate Partnership (REP). The overall site area is approximately 117 ha and is located north of the River Almond and adjacent to the A90, approximately 5 miles from Edinburgh City Centre.

**Figure 1 - Site Location**



- 1.11 The land at Craighall directly adjoins the existing West Edinburgh Strategic Development Area. It is also within a key strategic transport corridor (A90) as espoused by the spatial strategy in SESPlan 2 beyond 2025. Furthermore, it is also partly within the West Edinburgh Area of Search (see Choices Question 14A) which CEC is promoting as its preferred area for identifying future development sites in the west of the City.
- 1.12 The site is considered to be suitable for allocation as a housing led mixed-use development. About one third of the site is brownfield and previously used land. The MoD has now vacated the operational area and the buildings on site now sit vacant. A total of 78 existing residential properties are located within the site boundary at various locations, recently confirmed as having unrestricted Class 9 housing use.
- 1.13 Scottish Planning Policy seeks the most effective and sustainable use of land in appropriate locations, adjacent to available infrastructure. As demonstrated elsewhere within our representation this site at Craighall is more appropriate in strategic, accessibility and sustainability terms than other preferred or reasonable alternative sites presented within the Choices for City Plan 2030.
- 1.14 This representation is seeking a housing led mixed-use allocation within the emerging City Plan 2030. This representation therefore constitutes an objection to the Choices for City Plan 2030 as it does not include Craighall as a housing led allocation.

## Background and History

- 1.15 The Craigiehall site was considered as part of the preparation of the 2016 Edinburgh LDP, particularly within the LDP Report of Examination (30 June 2016). The Reporter stated at the time that, although the Craigiehall Village concept may have some potential for development, *'it was a concept which deserved further consideration and assessment before being allocated. The reporter concluded that, given the scale of the proposal and its potential implications for the spatial strategy, the proposal should be considered further (if appropriate and justified in the context of any new housing target) through the next review of the local development plan (i.e. this review).'*
- 1.16 Since LDP adoption, an application for Planning Permission in Principle (Ref 18/10545/PPP), was submitted in December 2018 to the City of Edinburgh Council relating to the Village Concept as considered by the LDP Reporter. This application included the MoD proposals as previously promoted and was accompanied by an EIA Report.
- 1.17 The description of development was as follows: At Craigiehall, Riverside Road, South Queensferry - Demolition of buildings, residential development (Class 9) and apartments (Sui Generis); commercial Class 1, 2 and 3 within a local centre; non-residential (Class 10); hotel (Class 7); park & ride; landscaping, open space, access, SUDS and ancillary development.
- 1.18 Following protracted discussions, the application was recommended for refusal and was withdrawn by the applicant prior to determination by the Planning Committee. Reasons for refusal focussed on LDP Policies Hou 1 and Env 10 having discounted relevant analysis in the accompanying Environmental Assessment. It was decided not to challenge this decision but to rather promote the site through the LDP review exercise, as suggested by the LDP Reporter in 2016.
- 1.19 Prior to the City Plan Choices publication, a meeting was held with the City of Edinburgh Council City Plan Team to discuss the development potential and planning merits of this site. This consultation reviewed the environmental capacity and outlined the clear benefits of re-development and allocation of the land as proposed.
- 1.20 Finally, it should be noted that the MoD received a Certificate of Lawfulness, under planning reference: 18/04513/CLE, to establish that the existing housing within the Site (78 units) fall into Class 9 (houses) of the Use Classes Order and such a use is considered lawful, notwithstanding the current noise environment.

## Housing Land Requirement

- 1.21 Hallam Land objects to the provisions of Choice 12 building new homes and infrastructure. In addition to responding to Choice 12 we have submitted a paper apart and subscribe to the

assessment work undertaken by Homes for Scotland in their representation.

- 1.22 The Second Proposed Strategic Development Plan (SDP2), together with the associated HNDA2 and Transport Strategy, was rejected by Scottish Ministers in May 2019. The current SDP1 2013 has not been replaced, updated or revoked so therefore remains the extant Strategic Development Plan, albeit effectively out of date.
- 1.23 As pointed out by the City of Edinburgh Council, National Planning Framework 4 will not be approved until the end of 2021 leaving a strategic vacuum in terms of housing land requirement targets. It is not accepted that simply using supply targets in SDP1 and HNDA2 is a legitimate or sensible basis for determining the City's housing requirement up to 2032, not least because there is no breakdown in these documents by planning authority.
- 1.24 An overall requirement of 20,800 Affordable Housing and 22,600 market houses is 'assumed' from SDP1; HNDA2 and the Councils Affordable Housing commitment. A total Housing Land Supply Target of 43,400. This target 2019-32 has not been evidenced or calculated in accordance with normal practice and constitutes under provision in terms of meeting the overall requirement and land supply target. This part of the MIR is therefore not agreed.
- 1.25 The suggested target of 22,600 market houses is therefore considered a gross underestimate (65%) of the actual requirement. This has the potential to significantly underestimate the real requirement and housing supply target for Edinburgh over the plan period up to 2032. We therefore need to see further evidence on how the target requirement has been derived by the Council.
- 1.26 Furthermore, we are concerned over the robustness of the Effective Housing Land Supply (HLA 2019) and its deliverability over the plan period to 2030. Optimistically it is estimated that there is potential for 47,000 units as of 2019 with 6,100 Affordable and 14,800 market housing. This is reliant on 9,200 units without consent and 16,900 houses which is identified through a very optimistic Housing Study which is superficial in nature and approach.
- 1.27 In addition, it is contended that there is sufficient land with consent within the urban area to deliver the requirement of 17,600 without releasing new greenfield land (Table1). This is disputed on the basis of the above figures and also because it is reliant on mixed use development using employment land. The delivery of land to meet the housing requirement is simply not feasible or viable and would result in an undersupply over the plan period.
- 1.28 An increased Housing Supply Target of 52,800 is assumed in Table 2 providing a more realistic requirement of 27,900. There is no information provided as to how robust this number is over the plan period.
- 1.29 Thereafter there is a high-level lightweight assessment of how these scenarios may be delivered through three options including Option 3 as a 'Blended Approach'. We are concerned

about the methodology used to assess land capacity in both Greenfield and Brownfield parts of the Housing Land Study. Craigiehall does not feature as part of this analysis other than as a Site Assessment.

- 1.30 In terms of delivery the preferred approach (Option1) to deliver new homes by the Council and its partners within the urban area is not considered feasible or viable to allow an annual delivery of 3,340 units per annum. This is largely because the Council will not be able to achieve its targets in respect of affordable housing or enabling work for intervention for acquisition in the land market. There is very limited evidence that the Council and its partners can deliver this approach which is driven by constraining greenfield land release.
- 1.31 The greenfield approach (Option2) requiring 27,900 units is identified as an alternative approach but then described as 'simply not an option'? A blended approach would in principle appear to be the most practical and realistic approach and is estimated to involve the release of 6,600 units from greenfield sources. However, it is not clear that this would be adequate to meet the city's housing supply target.
- 1.32 In terms of the broad options presented for housing land, it is stated that the Council has carried out a detailed site assessment of all potential housing sites. This is disputed and presents a very overoptimistic scenario regarding supply and delivery of brownfield land over the plan period. It is contended that the brownfield land at Craigiehall has not been properly assessed nor has the site adequately been evaluated as a whole in greenfield or brownfield terms.
- 1.33 The Plan goes on to examine potential greenfield sites in each sector of the city including West Edinburgh. The accompanying Map 15 is incomprehensible in geographical terms and does not reference Craigiehall as a potential greenfield release. The brownfield element of the site is not considered as part of the Housing Study.
- 1.34 The relationship between housing and economic development is considered in choices 13-16 and Map 20.

### **Response to Choices for City plan 2030**

- 1.35 Craigiehall can positively contribute to the four underlying objectives of City Plan 2030 namely:
- A sustainable city which supports everyone's physical and mental well-being.
  - A city where you don't need to own a car to move around.
  - A city in which everyone lives in a home which they can afford; and
  - A city where everyone shares in its economic success.

**A sustainable city which supports everyone's physical and mental wellbeing**

- 1 Making Edinburgh a sustainable, active and connected city
- 2 Improving the quality, density and accessibility of development
- 3 Delivering carbon neutral buildings
- 4 Creating Place Briefs and supporting the use of Local Place Plans in our communities

**A city in which everyone lives in a home which they can afford**

- 9 Protecting against the loss of Edinburgh's homes to other uses
- 10 Creating sustainable communities
- 11 Delivering more affordable homes
- 12 Building our new homes and infrastructure

**A city where you don't need to own a car to move around**

- 5 Delivering community infrastructure
- 6 Creating places that focus on people not cars
- 7 Supporting the reduction in car use in Edinburgh
- 8 Delivering new walking and cycle routes

**A city where everyone shares in its economic success**

- 13 Supporting inclusive growth, innovation, universities, & culture
- 14 Delivering West Edinburgh
- 15 Protecting our city centre, town and local centres
- 16 Delivering office, business and industry floorspace

1.36 It is considered that the LDP Choices Report in its current form risks failure in terms of reducing carbon outputs as well as reducing the level of housing and economic growth possible during the plan period. We are concerned that the exclusion of Craighiehall from the preferred choices 12a will result in a sub optimal spatial arrangement and will remove potential social economic and environmental benefits available to the city.

1.37 The following table presents a response to each of the Choices and explains how allocation of the site at Craighiehall can contribute significantly to achieving the overall aims and objectives of City Plan 2030.

CHOICE	JUSTIFICATION AND EVIDENCE
<b><i>A sustainable city which supports everyone's physical and mental well-being.</i></b>	
<i>1. Making Edinburgh a sustainable active and connected city</i>	<p>We agree with the option presented within Choice 1 and a strengthening of policies to reflect the climate change emergency and aim for a carbon neutral city by 2030.</p> <p>Achieving sustainable housing will be difficult if a purely brownfield housing land approach is adopted as recommended. A blended approach towards housing land would be needed to ensure sufficient open space, green and blue networks can be achieved within new development located close to transport networks.</p> <p>Craighiehall can assist in these objectives by connecting its strong landscape structure to the adjacent River Almond valley and wider networks in West Edinburgh, enhancing the city-wide network for active living and wellbeing. It would also contribute to biodiversity and improvements to the water and natural environment through blue-green infrastructure.</p> <p>Given the scale and nature of the site large areas of parkland and open space can be created and integrated with development. A new 'extra-large green space standard' is identified within our masterplan for Craighiehall with open space also available for new allotments and food growing.</p> <p>Policy 12 of the SDP looks for LDPs to define a green belts around Edinburgh to maintain the identity and character of the city and prevent coalescence, unless otherwise justified by the LDP's settlement strategy; direct planned growth to the most appropriate locations and support</p>

	<p>regeneration; maintain the landscape setting of these settlements; and provide opportunities for access to open space and the countryside.</p> <p>The SDP also acknowledges that the green belt around Edinburgh may need to be modified to accommodate development. Where land is required to achieve the strategy, effort should be made to minimise the impact on green belt objectives and secure long-term boundaries (Para 129).</p> <p>Supplementary guidance (SG) on housing land was produced in 2013. This required that West Edinburgh would need to provide 2,500 additional dwellings. Also, the SG recognised that the pace of housing completions would require to increase significantly to meet the requirement in future years.</p> <p>Paragraph 222 of the LDP confirms that whilst the green belt is established by the plan this should not automatically preclude housing development where the relevant balance of considerations points to approval and the objectives of the city-wide designation of green belt are maintained.</p> <p>Policy Env 10: Development in the Green Belt and Countryside states that within the designation shown on the Proposals Map, development will only be permitted where it meets specific criteria and would not detract from the landscape quality and /or rural character of the area. It is accepted that the Craigiehall proposals do not currently accord with the types of development envisaged by the policy.</p> <p>Craigiehall is partly located within the West Edinburgh Strategic Development Area. SESPlan 2013 (para 42) recognises that Green Belt releases may be required to accommodate growth in the SDA. Development would therefore accord with the spatial strategy of the development plan.</p> <p>A portion of Craigiehall sits within the West Edinburgh Strategic Development Area which has been identified for strategic growth in the development plan. LDP Choice 14 highlights the importance of the area as a strategic employment centre and for housing. Elsewhere in Edinburgh the green belt, has not been viewed as inviolable for development purposes by the Council where there are justifiable reasons for such development.</p> <p>The principle of development conforms with the spatial strategy of the development plan and fits with criterion (b) of Policy 12 by directing growth to a location where new development is supported.</p> <p>Green Network proposals are outlined in paragraphs 48-54 of the LDP. This links together natural, semi-natural and man-made open spaces to create an interconnected network that provides recreational opportunities, improves accessibility within the urban area and surrounding countryside, enhances biodiversity and the character of the landscape and townscape. Developments are expected to incorporate elements that positively contribute to the green network.</p> <p>Craigiehall has been subject to an Environmental Assessment of the proposed development, including landscape appraisal and visual impact assessment. The character of the area has changed considerably over the last 30 years as development has taken place on behalf of the MoD. The landscape and visual impact assessment has considered the further changes which the residential development within Craigiehall will have on the area. Assessment concludes that development is visually contained and that there is minimal impact.</p> <p>Proposals for Craigiehall would not lead to a sporadic expansion of the city as the site sits directly adjacent to the existing urban area. As such, the green belt is not detrimentally impacted by the proposed developments with the A90 and Burnshot Road providing defensible boundaries. As a</p>
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	<p>significant portion of the site is not in active agricultural use there will be no significant breach of preserving prime agricultural land.</p> <p>Craigiehall includes areas of woodland, open fields and public parks. Implementation of a public park in this location is identified as a key part of the Central Scotland Greenspace Network. Accordingly, the proposals could be viewed as the catalyst for the re-instatement of policy parkland.</p> <p>Existing woodland within the site would be substantially retained and supplemented by new belts of woodland to provide a strong green structure to integrate development into the landscape setting. Development will maintain opportunities for casual recreation and as can be seen from the layout, will provide clear links from parkland through the development to the housing using informal footpaths and cycleways.</p> <p>The proposals therefore proposals fulfil the objectives of criteria (a), (c) and (d) of SDP Policy 12. They also comply with the criteria in SESplan Policy 7 in that they will be in keeping with the character of the local area and will not undermine the green belt objectives</p> <p>Proposals have been carefully designed to draw upon the existing developments in the area, residential developments in terms of height and form; scale; layout, materials and detailing and have followed the design principles outlined in the Edinburgh Design Guidance. In combination with housing land supply, it is submitted that there are grounds for allocating land for development at Craigiehall.</p> <p>A third of the site has not been accessible to the public for many years (MoD land), and this can now change. Development will allow the public to enjoy the open spaces created and will provide an opportunity to re-establish the links between policy landscapes for public enjoyment.</p> <p>Accordingly, it meets key objectives within the Environmental and Landscape Reports and can assist in enhancing the green network in West Edinburgh linking Cramond with Kirkliston, Dalmeny and South Queensferry.</p> <p>Development at Craigiehall is therefore strongly in conformity with Choice 1.</p>
1A	<p>Craigiehall is recognised as an important landscape resource and an integral part of the green network which is already used for access and recreational purposes. The proposed development would conserve and enhance the existing policies in accordance with the aspirations of Historic Environment Scotland and the Council.</p>
1B	<p>No objection subject to specifics as the intention of this policy is unclear and there is no detail upon which to base a response. Craigiehall has significant green and blue infrastructure components which are identified within the Craigiehall Masterplan and considered as part of an Environmental Assessment. It will be important to ensure that any policy shift does not restrict land supply or constrain the delivery and implementation of land for housing on site.</p>
1C	<p>In principle we agree with measures that assist water management and climate change particularly if this facilitates the allocation and delivery of sites such as Craigiehall. The proximity and importance of the River Almond in this regard is recognised.</p>
1D	<p>Agree. Existing under utilised open space and landscapes are consolidated in to the Craigiehall Masteplan and will be actively used by the local population.</p>
1E	<p>The scale of allocation at Craigiehall would facilitate this provision and the Masterplan meets this 'extra-large green space standard' with over 5ha of green space within the Masterplan.</p>

1F	New development at Craigiehall would facilitate and enable the development of allotments and food growing space on site. The Masterplan identifies extensive open space and potential areas for planting.
1G	No comment on additional cemetery provision.
1H	Agreed. Long term maintenance and management arrangements would be subject to a management plan and factoring arrangements.
2. <i>Improving the quality, density and accessibility of development.</i>	<p>The underlying aims of Choice 2 are agreed. A more consistent approach to design layout and accessibility is welcomed and would benefit Craigiehall in comparison with other competing sites. We wish to see an efficient use of the MoD and Rosebery land at Craigiehall.</p> <p>Achieving this aspiration will be difficult if a purely brownfield housing land approach is adopted. Many brownfield sites would be restricted in developable area once open space and car parking requirements are met. A blended approach towards housing land would be needed to ensure enough developable land is available to meet housing needs.</p> <p>Choice 2B suggests density levels which would make best use of the land and ensure against underdevelopment. Assessment of this by EMA Architects on behalf of HfS casts serious doubt on whether the specified densities (minimum 65dph) can be achieved on many sites. It also points to a lack of evidence and analysis which leads to prescriptive overly stringent approach to minimum densities.</p> <p>Until there is better evidence, we would suggest that no change is made to density policies which could be detrimental to the market supply and delivery of housing as well as affordable stock. Rather that sufficient greenfield space is allocated for development to allow all development within the city to be at a density that respects its surroundings, as is currently the case.</p> <p>Development at Craigiehall will respond to climate change, accessibility for all ages and mobility needs. This could be provided through adapted dwellings and dedicated care provision.</p> <p>The proposed neighbourhood centre, commercial area, community facilities and primary school are included to serve the proposed residential element of the development site and ensure the proposals are compliant with the walkable neighbourhood principles contained within Designing Streets. This will be conducive to improving quality and density.</p> <p>Density levels themselves should reflect the unique characteristics, landscape setting and topography of the site. Opportunity exists for areas of the site to be high density with other areas reflecting the urban edge location and transition to the countryside fringe.</p> <p>A revised Craigiehall Masterplan has been produced as part of this representation. The amended layout is revised to reflect City Plan 2030 objectives and SPP objectives regarding streets and high-quality layouts. The Masterplan also delivers high quality useable open space and would stand up well to scrutiny because of more rigorous policy standards.</p> <p>It therefore strongly complies with the objectives of the MIR.</p>
2A	<p>This policy objective is rather unclear as Design and Access Statements already cover these issues including reference to climate change, energy and waste. Clarity is required on this matter and it should be determined what information is required and in what format for planning purposes.</p> <p>The Craigiehall Masterplan is an inclusive and sustainable blueprint for a high quality of development at an appropriate density. Craigiehall will cater for people of varying needs, age and mobility.</p>

2B	<p>Craigiehall represents an efficient, sustainable and viable use of brownfield and greenfield land. The Craigiehall masterplan indicates the type of density and development that can expect to be achieved on site by developers/ housebuilders.</p> <p>The planning system needs to be responsive to the needs of the market, flexible in allowing a mix of development and have regard to viability and delivery.</p> <p>In terms of density we would concur with the conclusions reached by Homes for Scotland and EMA Architects. A greater degree of flexibility is required to take account of market demand, housing mix and site characteristics.</p> <p>Craigiehall will be capable of accommodating a wide range of densities and house types, more so than many other urban or greenfield sites. This accords with SPP. Notwithstanding this issue requires further consideration and research.</p>
2C	<p>Agreed. The Craigiehall Masterplan delivers active travel and connectivity links as required by the Council. It is a high quality permeable and interlinked layout which encourages public transport patronage.</p>
2D	<p>Agreed open space and public realm are important components of the Craigiehall Masterplan. Site capacity and density is not compromised, and the scale of development supports a high quality neighbourhood hub.</p>
3. Delivering Carbon Neutral Buildings	<p>Buildings at Craigiehall can meet the zero carbon /platinum standards as set out in the Scottish Building Regulations (50% carbon reduction).</p> <p>Development at Craigiehall would therefore fully comply with this standard.</p>
3A	<p>It is considered that the responsibility for this policy implementation should rest with the Building Standards System.</p>
4. Creating Place Briefs and Local Place Plans in our communities.	<p>There is limited information and guidance on the content and process of producing Local Place Plans. Further detail on the implications and relationship to the LDP is required</p> <p>Hallam Land Management is prepared to involve the local community in preparation of a Place Brief for Craigiehall to guide development standards and quality. Indeed, this process of collaboration with the local community has commenced and adheres to place standard principles promoted by the Council.</p> <p>The LPP It would address all relevant and material planning policy and environmental considerations relating to the green belt and historic landscape designations.</p> <p>The Craigiehall Masterplan is a starting point for this design process and the development would therefore fully conform with this overarching objective. In particular, development at Craigiehall could deliver much needed community infrastructure.</p> <p>We would reserve our position in relation to the specific wording of policies or consultations in relation proposed Supplementary Planning Guidance – The Edinburgh Urban Design Guide.</p>
4A	<p>Craigiehall is a large-scale strategic site and a major development. Local Place Plans would need to integrate with the statutory procedures and development management process.</p> <p>LPPs should be seen as a means of facilitating delivery and involving key stakeholders in implementation.</p> <p>Issues relating to feasibility and viability need to be considered in accordance with the statutory provisions of the Act the Circulars and</p>

	<p>Regulations. Planning obligations need to be clearly related to the scale and scope of development, and Craigiehall is well placed to deliver significant benefits in this regard.</p>
4B	<p>Noted and this is a matter for the Council and further details are required particularly in relation to the proactive policy role and that of statutory development management as the planning authority.</p> <p>The Council needs to broker the optimum solution for sites having regard to all relevant policy and material considerations. All planning obligations and contributions should be determined and agreed with reference to a sound evidence base.</p>
<p><b><i>A city where you don't need to own a car to move around.</i></b></p>	
5. Delivering Community Infrastructure	<p>A major advantage of Craigiehall is the fact that there is existing infrastructure and services on site to facilitate new development. Furthermore, the scale and nature of the site allows for sufficient space to be made available for supporting facilities such as schools, healthcare, quality bus corridors and a dedicated park and ride facility.</p> <p>We are in broad agreement with the sentiment of the preferred choice but reserve our position pending further information on detailed educational matters such as educational catchment arrangements. Craigiehall can assist in relieving current pre-existing pressures at primary and secondary level across West Edinburgh (South Queensferry and Kirkliston).</p> <p>Proposed educational infrastructure for West Edinburgh is particularly vague and lacking in detail. Further work and information are required on the practicalities/ deliverability of both potential brownfield and greenfield options identified.</p> <p>Regarding the availability of education and health facilities these have been considered as part of the previous application. A primary school can be provided on site together with a new secondary school to service west Edinburgh. It is intended make appropriate education contributions in line with the Council's Supplementary Guidance on developer obligations to mitigate the impact of development. Land can also be made available for health facilities without directly delivering the infrastructure.</p> <p>Hallam Land will comply with the terms of Policy Del 1 and Scottish Government Guidance on planning obligations, including the funding of improved amenity/parkland. The criteria within Policy 7 of SESplan 2013 and Policy Hou1 on the provision of infrastructure in relation to the release of greenfield housing sites can therefore be met.</p> <p>In addition, we are at a loss to understand the arrangements for Kirkliston and South Queensferry proposed within the LDP. It is noted that there is no site or funding in place for a new secondary school at Kirkliston. Financial contributions together with 35% affordable housing will need to be carefully considered against other costs in relation to the viability of Craigiehall and economies of scale.</p> <p>Craigiehall can assist in delivering new school infrastructure in a location that can best serve existing pressures in West Edinburgh and Kirkliston. A secondary school could be delivered on site or important financial contributions made to the West Edinburgh school. A new primary school is proposed as part of the development and land made available for this.</p> <p>A new local / neighbourhood centre is proposed and this could attract community facilities such as health centre/pharmacy etc. Finally, a number of listed buildings will be retained, and they may well lend their use to a community facility.</p>

	<p>We note that a Primary Healthcare Appraisal is not yet available and is an additional deficiency in terms of determining an appropriate policy on this issue.</p> <p>Provision is made for access to public transport and active travel including contribution to a subsidised bus service. Indeed, the Council's Active Travel Team sees the merits in the location of Craighiehall and the value nearby travel networks can bring to the site.</p> <p>We do not comprehend how the A90 is not identified as a preferred corridor within the Sustainable Travel Study and query the methodology in this report. Otherwise Craighiehall complies with the City Mobility Plan and an interchange hub for sustainable transport modes is identified in the Masterplan.</p>
5A	Agreed. The fact that available infrastructure exists at Craighiehall is a major advantage in terms of sustainable development and delivery and, should be recognised within the spatial strategy allocations. Provision for community infrastructure is made within the Craighiehall Masterplan.
5B	Agreed. Craighiehall will deliver community facilities within an accessible location which is convenient for public transport. Community and convenience facilities will be located in the neighbourhood hub.
5C	Agreed. The layout and masterplan allow for walk-in convenience provision thereby reducing the need for car borne travel.
5D1	Agreed. Infrastructure requirements should be identified in the LDP and clearly justified in relation to the scale and scope of new development. Craighiehall has the critical mass to deliver community infrastructure on a viable basis.
5D2	Noted - subject to further information. Cumulative contribution zones should be subject to further consideration and influenced by the Chief Planners letter to the Council on Supplementary Guidance on Developer Obligations.
5E	Agreed that developer contributions should be contained within the LDP and Action Plan in the interests of transparency. Supplementary Guidance should recognise the economics of development and viability issues relating to individual sites.
6. <i>Creating Places that focus on people and not cars</i>	<p>The location of land at Craighiehall is well positioned to maximise development in accordance with the City Mobility Plan and the Sustainable Transport Strategy being adjacent to a quality bus corridor. Craighiehall will therefore become a natural extension to the city.</p> <p>It is our contention that the M90 should be identified as a strategic transport link and can serve development in a sustainable and integrated manner. Support for this preferred choice is qualified in respect of the Councils targets for sustainable transport modes in this part of Edinburgh.</p> <p>A well-planned road network within the site will be designed to facilitate public transport operators. A quality bus corridor and pedestrian links will be created to promote sustainable travel. The site will be served from Phase 1 by a bus service which will be funded by the applicant as referenced in Choice 5.</p> <p>A 500 car Park and Ride site adjacent to a new transport hub/ interchange is proposed. This will facilitate public transport to Kirkliston, South Queensferry as well as the city centre. It would address a gap in provision on a key arterial route into Edinburgh and address the dispersal of housing to Fife within SDP1.</p>

	<p>Walking and cycling are a key part of the Masterplan and enhanced routes are planned through the development. The Council's Active Travel Team sees the merits in the location of Craigiehall and the value nearby travel networks can bring to the site.</p> <p>A proposed neighbourhood centre, commercial area, community facilities and primary school are included to serve the proposed residential element of the development site, and ensure the proposals are compliant with the walkable neighbourhood principles contained within Designing Streets. The amenities proposed are well within the recommended walking distance of 1,600m as detailed in PAN 75.</p> <p>The location and form of development therefore fully complies with this objective and is capable of implementation through the Local Place Plan.</p>
6A	<p>Noted but there are no specific targets identified and the lack of detail makes a response difficult in respect of Craigiehall. Any targets set need to be realistic and at present there appears to be a disconnect between the LDP Sustainable Transport Strategy and City Mobility Plan.</p>
6B	<p>We are not clear that this is a function of Place Briefs. Targets for Craigiehall could reflect the public transport availability and local community infrastructure</p>
7. <i>Supporting the reduction of car use in Edinburgh.</i>	<p>We note the Councils preference for removal of minimum parking standards and car free developments. This will only be feasible in certain circumstances under a brownfield scenario and with a step change in public transport provision. It is difficult to envisage how the major employment sites being promoted by the LDP would operate effectively in such circumstances.</p> <p>As a site on the urban edge adjacent to a public transport corridor, development at Craigiehall will support the City Mobility Plan and restrict demand for vehicular movement in and out of the city. The development will contribute to public transport and car club initiatives as well as electric car charging points.</p> <p>Currently Policies 7 of SESplan 2013 and LDP Policy Hou 1, require developments to provide appropriate infrastructure. This is supplemented by Policy Del 1 Developer Contributions and Infrastructure Delivery. All relevant infrastructure can be provided.</p> <p>Policy Tra 8 of the LDP requires development proposals relating to major housing which would generate a significant amount of traffic to demonstrate through an appropriate transport assessment that any impacts of the development will be addressed and mitigated. Any potential improvement works can be secured through a legal agreement if planning permission were granted.</p> <p>The Craigiehall Transport Assessment concludes that the site is accessible by a range of transport modes and located within walking distance of local services. Further the development provides opportunities to link the internal network to the existing pedestrian, cycle and public transport networks with the aim of ensuring that as the development progresses, all areas are able to utilise non-car modes.</p> <p>Our transport analysis predicts that all junctions in the area will operate satisfactorily with the addition of the traffic, together with traffic from committed developments in the area. Craigiehall can provide the opportunity for people to live within walking/cycling distance of employment areas, with the potential to restrict the long-term growth in car borne traffic.</p>

	<p>The proposed Park and Ride is in a highly efficient and convenient location for residents and commuters of both the new development and surrounding villages and towns.</p> <p>Craigiehall therefore fully complies with this objective in terms of reducing the number and length of trips.</p>
7A	<p>Noted subject to the detail of this policy to ensure these are not prohibitive in terms of housing development or location. At present there is insufficient detail to respond to 'targets' or traffic management measures. In terms of Craigiehall the proposed approach would appear to be rather punitive as opposed to encouraging other modes of transport and utilising the Park and Ride opportunity.</p>
7B	<p>No comment.</p>
7C	<p>Agreed but the emphasis must be on widening the choice of transport modes. Craigiehall will make provision for all types of transport provision and parking (including bicycles) as well as charging and associated infrastructure. It is not clear how demand for parking would 'controlled'.</p>
7D	<p>Agreed. Craigiehall makes provision for a 5-600 space Park and Ride facility on a strategic in road corridor and provides potential for modal shift to public transport in accordance with the City Mobility Plan.</p> <p>This is a major opportunity for the city in north west Edinburgh to intercept traffic entering the city centre via the A90.</p>
8. <i>Delivering new walking and cycling routes</i>	<p>Development at Craigiehall would fully comply with this choice which is supported. It would provide a major opportunity for enhancement of walking and cycling routes and we are surprised that it does not feature in delivering projects identified at 8b.</p> <p>The proposed Masterplan demonstrates connections and enhancements to the existing cycle and footpath network adjacent to the site and within the wider West Edinburgh area. These direct, coherent, safe and attractive footway connections will significantly improve pedestrian connectivity.</p> <p>Development would facilitate major improvements to the River Almond Walkway facilitating connections to Kirkliston, Strathalmond and Cammo as well as other strategic active travel links.</p> <p>Development at Craigiehall would therefore directly contribute to this MIR objective and facilitate the preferred choice.</p>
8A	<p>Agreed. Craigiehall can make a valuable contribution to new routes within the Cycle and Footpath Network in north west Edinburgh. These links are not fully accounted for by the Report.</p>
8B	<p>The routes should include paths and links in and around Craigiehall.</p>
8C	<p>Agreed. Craigiehall – strategic active travel links and the City Mobility Plan.</p>
<p><b><i>A city in which everyone lives in a home in which they can afford.</i></b></p>	
9. <i>Protecting against the loss of Edinburgh's homes to other uses.</i>	<p>It is acknowledged that the existing housing stock within the city is under pressure from alternative uses such as short term lets. However, this is also because the supply of new houses is artificially constrained by the available land supply and largely reliant on brownfield and windfall sites.</p> <p>This issue needs to be seen in the context of the overall requirement and demand for housing in the city from all sources, including visitors and students as well as specialist housing types.</p> <p>We are not in agreement with the Council's estimates in terms of requirement to 2030 as this would provide for a gross undersupply of sites</p>

	<p>for the city. We therefore in support of a greenfield / blended approach to housing development.</p> <p>It is acknowledged that this Choice deals primarily with short term lets and that proposed changes 9A and 9B do not directly relate to the proposals for Craigiehall. The designation of control areas and other restrictions will relate primarily to the city centre however, it will stimulate some demand in the hotel sector and could result in a concentration of short term uses in some suburban locations.</p> <p>Craigiehall House could benefit from this dispersion of demand to new hotels but is currently constrained by LDP Policy Hou10.</p> <p>Nonetheless, the addition of a new greenfield / brownfield allocation for housing led (@1200 units) mixed use development including a hotel in West Edinburgh would assist in relieving this pressure to a certain extent.</p>
9A	No comment.
9B	<p>Noted. The annual loss of homes to other uses should be fully accounted for in the housing land requirement and housing supply targets (Choice 12). Craigiehall can assist in helping to increase the housing land supply over the plan period.</p>
10. <i>Creating Sustainable Communities</i>	<p>The desire to increase the number of new homes built in Edinburgh is welcomed and supported by the proposed development at Craigiehall. The assumption that using 'the limited space in our city to ensure the creation of sustainable communities' is not accepted or evidenced in any way by the Monitoring Report. Indeed, it could have serious non intended consequences for housing supply</p> <p>This issue also needs to be seen in the context of the overall requirement and demand for housing in the city from all sources, including visitors and students as well as specialist housing types. We understand that Homes for Scotland is undertaking some relevant research for the LDP in this regard.</p> <p>We are therefore not in agreement with the Council's estimates in terms of requirement to 2030 as this would provide for a gross undersupply of sites for the city. We are therefore in support of a more blended approach to housing development.</p> <p>Alternative commercial, student, retail and leisure developments should be seen more positively as part of strong sustainable communities. These can often complement neighbourhoods where there is a demand for enhanced facilities and could potentially be accommodated at Craigiehall if appropriate.</p> <p>Growth of the city's universities and further education sector is a key part of the Economic Development Strategy with the key institutions projecting expansion in student numbers.</p> <p>Changes proposed by the Choices report appear to introduce regulations for student well-being that seek to regulate the market in a highly complex manner. The simplest way of relieving pressure and providing choice will be to increase the stock of available housing in order to meet projected household and student numbers in the city.</p> <p>Craigiehall would be an appropriate location for mixed use development and could potentially incorporate an element of student housing in compliance with Choice 10.</p> <p>The addition of a new greenfield allocation for approximately 1200 houses in West Edinburgh would assist in relieving this pressure on stock elsewhere in the city and allow re-locations and flexibility in the market.</p>

10A	Agree. Student housing will need to be more integrated with other forms of housing and mixed-use provision across the city. Craigiehall may have has the potential to incorporate some limited student housing and other forms of specialist provision as part of a sustainable approach to balanced communities.
10B	It is not clear what this this policy is seeking to achieve as there is insufficient detail included in the Choices Report. There is a danger that a restrictive policy could prove a disincentive to investment making mixed uses difficult to achieve. This could be counterproductive and not applicable in some cases dependent on viability and design requirements.
10C	No comment – insufficient detail.
11. <i>Delivering more affordable homes.</i>	<p>Delivery of more affordable homes in the appropriate tenure and location is a key priority for the city. Whilst we agree to the overall objective and note the comments made further detail in respect of the policy and any supplementary guidance needs additional evidence.</p> <p>The legacy of undersupply through previous development plans and a failure for Edinburgh to account for its own indigenous needs has restricted the land supply and constrained affordable housing development. This has adversely affected price and rental levels and requires to be corrected as part of this LDP.</p> <p>It is considered that the most effective means of delivering affordable housing stock is by ensuring a healthy supply of market housing through land allocations such as Craigiehall as part of the whole system approach. We do not accept that the Council and its partners can deliver the requisite supply of affordable housing over the plan period without leverage from the private sector.</p>
11A.	<p>The increase of the affordable housing requirement from 25% to 35% is noted although again there is little justification or evidence to support this policy shift. Craigiehall is capable of accommodating such a shift in policy given the nature and scope of development being proposed there through the Craigiehall Masterplan.</p> <p>The Council's aspirations to provide 20,000 new affordable dwellings in the city up to 2030 is noted and supported. Whether this is achievable in real terms remains to be seen as it will require a level of performance and delivery which hitherto has not been achieved.</p> <p>Increasing the Affordable Housing quota to 35% essentially requires a ratio of affordable to market housing of 1:2 rather than the current 1:3. This has implications for viability and delivery, particularly given the reliance on more difficult and costly brownfield sites. The implications for development economics become more complex when considered in conjunction with Choice 10 above.</p> <p>The Council's approved the Council's Strategic Housing Investment Plan (SHIP) 2020-2025 for submission to the Scottish Government. It highlights the significant challenges associated with fulfilling the Council's commitment to deliver 20,000 affordable homes over the next 10 years, including securing both land and finance.</p> <p>In debating the SHIP, councillors highlighted that the requirement for affordable housing in the SHIP exceeded the land identified as available in the 2019 Housing Land Audit and as such a lot more land would be needed. The Council was working on its Choices document for the next local development plan which will set the housing requirements for 2020 to 2030.</p>

	<p>This shortage in land supply was recognised by the Council when approving its latest SHIP. The Council was to have brought forward its Choices document outlining how it intends to provide sufficient land to meet its housing land requirements.</p> <p>It is appropriate to wait until a new LDP is in place to start to address the shortfall in supply, particularly given the need to deliver in the region of 2,000 affordable homes every year in accordance with the SHIP programme. The Reporter in the SESplan 2 examination acknowledged that new land would require to be released to meet the demand for affordable housing.</p> <p>Delivery of this quantum of development will require more land to be identified in locations such as Craigiehall. It is in such locations where the Council can meet objective B and be more prescriptive in terms of tenure mix and on-site provision.</p> <p>In order to meet the 35% affordable housing objective, the Council will need to take a more realistic and flexible policy to allocation as part of a blended housing land approach. Furthermore the 35% may well be achievable but this commitment will need to assess requirements from other policy areas on a cumulative basis to ensure that developments are viable and deliverable.</p> <p>It is submitted that that the development at Craigiehall could support the new quota, given that it has scale and critical mass. The land is already serviced and therefore it would be able to absorb abnormal costs more readily than alternative locations.</p>
11B	<p>Agree that a mix of housing types and tenures is desirable with a general focus on family housing. Any policy in this regard needs to have flexibility and be responsive to ongoing changes in the city-wide housing market. The means of achieving this needs to be carefully considered and is not evident from the information provided that a more 'prescriptive' use can be evidenced or justified through needs assessment/ waiting lists.</p> <p>It is not clear how the LDP can be 'prescriptive' in terms of overall provision particularly in relation to market housing over the period of the plan. Furthermore, such a policy would need to take account of the locational and physical characteristics of individual sites.</p> <p>There is no indication of how such a policy would work in practice and an attendant risk that it may restrict supply and exacerbate problems of affordability price and rental levels.</p>
12. <i>Building our new homes and infrastructure</i>	<p>The questions of how many homes are required in the city, where and how these will be delivered, needs to underpin the MIR as it impinges on several interrelated policy areas. A key difficulty for the Council is the lack of strategic guidance in terms of housing targets or any form of spatial strategy associated with the distribution of land.</p> <p>In terms of the quantum of houses required to 2030 the MIR relies on the extant SDP which was approved in 2013 and is now considerably out of date. SDP2, based on a new HNDA, was rejected by Scottish Ministers on transport and spatial strategy grounds in May 2019. As a consequence of the Planning Scotland Act 2019 there will be no agreed housing requirement until NPF 4 is approved in late 2021.</p> <p>The Council's Housing and Transport studies are currently considered to be unsuitable evidence bases for determining these issues specifically in relation to Craigiehall. Indeed, we consider both to be fundamentally flawed in terms of the West Edinburgh SDA and the specific consideration of Craigiehall and the M90 corridor.</p>

	<p>The proposal to base City Plan 2030 on targets within SDP1 and HNDA2 is therefore open to question and interpretation, for reasons as set out in the MIR itself. Not only are the figures historic, scenario based and Lothian wide. In particular there is no breakdown for Edinburgh beyond 2024.</p> <p>If HNDA 2 is used as a reasonable baseline both the preferred and alternative options relating to the housing targets of 43,400 and 52,800 respectively fall significantly short of meeting need and demand in full. There is no justification why this should be the case and why the undersupply of housing is not being addressed. Indeed, it is expected that the Council should set challenging targets in the LDP in light of private housing land completions in recent years.</p> <p>On this basis under the preferred option in addition to 20,800 affordable houses, the market housing target is 22,600 units. However, these figures represent broad estimates which are largely unsupported by up to date evidence and household projections. In addition, this approach is not considered to be realistic feasible or deliverable over the term of the LDP.</p> <p>Regarding delivery, the City Council considers that there is currently sufficient land for 47,000 houses. Of this 9,200 has no consent and 16,900 is brownfield or windfall supply.</p> <p>Programming indicates that not all sites in the 2019 HLA will be complete by 2032. Extrapolating the figures in accordance with SPP, Circular 2/2010, current practice (DPEA) demonstrates that using this method only 21,055 dwellings would be delivered on effective sites. Constrained sites should be excluded from the analysis and only effective sites should contribute to the land supply.</p> <p>The Council's Housing Study is sub divided into two parts which are internally inconsistent and do not relate to equivalent sub-divisions. There are 23 Assessment Areas, none corresponding to Craigiehall, however it should be noted that nearby Area 22 West Edinburgh scores particularly well on the given criteria in Figure 2 Assessment of Site Groupings.</p> <p>The brownfield Urban Area Site Assessment identifies 142 sites with development potential and a notional density capacity of 16,900-27,000 units. Based on Figure 4 Estimated Site Capacities, this is considered a gross overestimate of urban brownfield capacity within the city and completely underestimates the difficulties of delivering such land.</p> <p>It should also be noted that there are no brownfield sites identified within the M90 corridor or in the vicinity of Craigiehall. This is despite both Craigiehall and the nearby Royal Elizabeth Yards being in marginal (temporary) employment use.</p> <p>The assessment of potential housing land sites in the urban area is not properly considered in terms of delivery or economics. It is assumed that all sites (16,900) identified will be delivered in full which is not a credible proposition particularly given ownership, cost considerations and economic viability.</p> <p>The preferred option is reliant on Compulsory Purchase with long lead in periods and legal issues. It is rendered unfeasible by this approach and emphasises the need for additional greenfield allocations.</p> <p>The greenfield or market requirement is informed by the housing land supply target and HNDA as discussed above. Option 2 with a requirement of 28,000 houses, provides a reasonable indication of what the market approach should entail including a generous provision for affordable housing and urban area brownfield development.</p>
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	<p>In respect of Greenfield Housing the methodology is 'partially based' on Strategic Development Areas without justification for their continued existence, as opposed to development corridors. It is also done in the absence of information from the Council's emerging West Edinburgh Study.</p> <p>Craigiehall is considered under Sector 6 which also covers Kirkliston and South Queensferry. West Edinburgh is Sector 1 which is only one of two sectors based on SDAs.</p> <p>The evaluation methodology for Craigiehall is considered to be flawed and inconsistent, both in its content and detail but also in respect to comparator sites. We have assessed the Sustainable Transport Study, the Landscape Study and the Environmental Study and re-evaluated the merits of the Craigiehall site. In terms of scoring we would make the following comments in respect to key criterion.</p> <ul style="list-style-type: none"> <li>- Craigiehall is on the edge of the West Edinburgh SDA and part of the site lies within the West Edinburgh Area of Search. It should be considered as part of these zones for development purposes.</li> <li>- In relation to Convenience this is partially compliant, and the development will have on site neighbourhood facilities.</li> <li>- Employment land is identified on site and there is access to nearby opportunities at Royal Elizabeth Yards and Edinburgh Airport as well as the A90 corridor.</li> <li>- Development would support active travel and footpaths already exist. The Council's Active Travel Team sees the merits in the location of Craigiehall and the value nearby travel networks can bring to the site.</li> <li>- Public transport linkages exist and are enhanced through masterplan interventions.</li> <li>- Community infrastructure is provided through an onsite primary school, there is potential for a secondary school site and contributions to wider infrastructure.</li> <li>- Any impact on the landscape character can be adequately mitigated and the analysis does not relate to the landscape or environmental assessment work carried out as part of the PPP application and EIA.</li> <li>- Green Network – fully compliant</li> <li>- Flood Risk – All concerns raised by SEPA in response to the PPP application were addressed and SEPA withdrew its objection to the proposals.</li> </ul> <p>RFA has produced an alternative and more accurate and informed scoring for the site, as presented in Appendix 1.</p> <p>Perversely, in terms of Site Selection the MIR rejects Craigiehall and identifies Conifox, Carlowrie and North Kirkliston as potential development areas as reasonable alternative choices for greenfield housing land release. These areas are relatively recent additions to the Edinburgh Green Belt. This is on top of recent significant development in Kirkliston which has had limited time to integrate effectively into the wider settlement.</p> <p>In effect more development sites are identified outwith SDAs than within them. This evaluation does not bear objective scrutiny in locational, sustainability or material planning terms.</p>
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	<p>The Sustainable Transport Study does not identify the A90 corridor as a Priority Transit Corridor. We fundamentally disagree with the flawed approach taken to evaluation in relation to Queensferry Corridor 9 and have reassessed the Table 5.2 Transit Assessment – Summary Findings.</p> <p>We also respond to Table 5.3 Transport Priorities in Non- Transit Corridors. Associated with this is the City Mobility Study Which puts great emphasis on Park and Ride schemes.</p>
12B	<p>We object to this section of the Choices report as it is our contention that green field release is grossly underestimated on any analysis of the housing land requirement figures. None of the proposed greenfield releases are specifically supported as the premis for the preferred approach is flawed. A more comprehensive blended approach with increased greenfield allocations is advocated as suggested in Option 3. Notwithstanding, more than the 6,600 units of greenfield land will be required over the plan period.</p> <p>The strength of the Edinburgh economy requires additional housing land to be made available given current and projected levels of population and household growth. The Housing Supply Target calculated in accordance with SPP provides for a requirement of @ 37,000 houses.</p> <p>There is a lack of an adequate policy or evidence base and acknowledged difficulties in respect of delivering brownfield land on urban capacity sites (11,000 homes over the plan period).</p> <p>Also, Edinburgh needs to redress previous shortcomings and take responsibility for a higher proportion of its % land supply and allocate to a target of @ 28,000 houses as suggested in Option 2.</p> <p>In terms of 12B relating the delivery of 43,400 homes is unambitious and based on conservative rates of combined (market and affordable) construction rates of 3,340 per annum.</p> <p>Conversley, the Council identifies capacity for 47,000 homes. This is focused on 275 hectares of urban area land with assumed potential for mixed uses. As identified, much of this urban capacity land is in employment use and its re-development will not only be problematic but will remove valuable local employment land for small businesses.</p> <p>Alternative forms of delivery are considered through the Council and its partners or through the market housing developers. The former requires additional land for 17,600 units and the latter land for 27,900 units, both allowing for only 10% flexibility and an affordable housing quota of 35%.</p> <p>The latter option is closer to the housing land requirement advocated by HND A2 and delivers 79% of Edinburgh’s target. Despite being challenging in terms of construction, this still represents a significant shortfall in housing land target over the plan period.</p> <p>Under 12C a blended approach requiring 17,600 units with greenfield land release of 6,600 units is considered. Given the status of urban land and for the reasons above the delivery of 11000 on brownfield land is highly ambitious. Nonetheless, remarkably Option 1 Delivery by the Council and its partners within the Urban Area is the preferred option</p> <p>Each of the 3 Options makes a range of assumptions. The preferred option relies on rapid intervention significant changes to infrastructure co-operation with public sector partners, the delivery of 275 hectares of employment land / mixed use redevelopment and a significant CPO programme. There is no evidence to suggest that this is feasible or financially credible in terms of resources or programme nor has the impact of this approach has not been assessed.</p>

	<p>It is claimed that the preferred approach '<i>minimises the amount of new homes we need to build to reach our affordable housing target with no greenbelt release</i>'. Remarkably, the Council goes on to state that this approach may not be financially viable to deliver an annual rate of 3,340 units per annum.</p> <p>Despite this the Council rules out a market/developer led greenfield approach requiring 27,900 units (4,600 houses per annum). It relates this spuriously to the climate change commitment, infrastructure costs and market demand.</p> <p>A blended approach which requires greenfield release of 6,600 units will not be sufficient for the reasons stated above and we would urge the council to review this option with a replenished greenfield element of @ 16,700 units to compensate for the deficiency in the projected land supply.</p> <p>The current spatial pattern for greenfield sites identified in the alternative scenarios does not appear to be logical or coherent in terms of the LDP s underlying aims. Indeed, some proposed allocations are directly contrary to the LDP objectives.</p> <p>We object to Craighiehall not being identified within the greenfield or blended approach particularly given the overwhelming evidence in favour of additional allocations. It is not for individual developers to object to allocations particularly in circumstances of a projected land deficit.</p>
12C	Craighiehall – greenfield area comprising Rosebery Estates land. See Craighiehall Village Masterplan.
12D	Craighiehall – brownfield site and barracks as owned by the MoD. See Craighiehall Village Masterplan.
<b>A city where everyone shares in its economic success</b>	
13. Supporting Inclusive growth innovation universities and culture	<p>Noted as part of the ongoing Economic Development Strategy for the City. Inclusive growth will assist in strengthening the housing market.</p> <p>The preferred strategy choice however is opaque and refers to Choice 14 which relates to Delivering West Edinburgh. This is not yet available, so it is not possible to fully comment in relation to potential implications for Craighiehall.</p> <p>Craighiehall provides an optimum opportunity to integrate employment and housing markets in West Edinburgh.</p> <p>City Deal will if properly implemented support the growth of this sector. Craighiehall can also contribute to the sector as an outreach campus for education and cultural activities.</p>
13A	Noted and in general there is support for this approach and therefore no comment other than Craighiehall provides an ideal location and platform for such a policy approach to 'good growth'.
14. Delivering West Edinburgh	<p>Delivery of West Edinburgh as a national priority is supported and Craighiehall should be an integral element of the strategy. However absolute adherence to the Strategic Development Area boundary is not agreed as relevant and greater flexibility is required recognising the importance of the A90 corridor.</p> <p>Accordingly, the area of search should be extended from the Firth of Forth to the Pentland Hill fringes as large parts of the current area are allocated, consented or under development offering limited opportunity for further housing or economic development to be identified in this LDP.</p>

	<p>West Edinburgh is a fundamental element of the City's Economic Development Strategy. The MIR refers to the West Edinburgh Study, but choices have been made without any findings of this Study being available for scrutiny as part of the LDP Choices Report. This disallows proper consideration of this part of the Plan at a critical stage of the LDP process.</p> <p>The Craigiehall site contains brownfield employment land and the MIR 'expects older estates and business floorspace to be re-developed for housing and other uses.</p> <p>Craigiehall lies, in part, within the Area of Search. The Area of Search is noted by the Council as being well served by transport and potential benefits from the City Deal, yet the appraisal of the Craigiehall site takes no account of this.</p> <p>Craigiehall is well positioned to make best use of existing public transport infrastructure and propose enhanced connectivity to the A90 corridor and existing bus stops adjacent to the site. Sites such as Calderwood and Confix have no such advantages.</p> <p>The site is capable of a range of mixed uses office industry research education hotel/ leisure /housing.</p>
14A	<p>Noted.</p> <p>West Edinburgh needs a broad area of search including Craigiehall, which is partly within an SDA and adjacent to a main public transport road corridor (A90). It is capable of mixed uses and well served by public transport integrating with the Commercial and Industrial needs Studies as well as the City Mobility Plan.</p> <p>It is unclear how the exercise being undertaken to inform this policy can avoid being entirely site specific and further information is awaited from the Council in this regard. Craigiehall should be considered as part of this review.</p>
14B	<p>No comment as this would appear to be already agreed in principle – subject to 'other uses' in the West Edinburgh Study.</p>
14C	<p>No comment – subject to detail on 'alternative uses' within the West Edinburgh Study.</p>
15. <i>Protecting City Centre Town and Local Centres</i>	<p>We have had regard to the Commercial Needs Study and this choice is noted. A new Local Centre is promoted at Craigiehall, recognising the limited space available at Cramond and Cammo. This is in accordance with the City Mobility Plan.</p> <p>The Craigiehall development would provide a new neighbourhood hub and local centre to support the new development and wider area. It would allow local convenience provision within walking distance of nearby housing.</p> <p>A catchment of 1200 homes together with employment and other facilities will support the neighbourhood centre in terms of vitality and viability</p> <p>The proposed neighbourhood centre, commercial area, community facilities and primary school are included to serve the proposed residential element of the development site and ensure the proposals are compliant with the walkable neighbourhood principles contained within Designing Streets. All of the amenities proposed are well within the recommended walking distance of 1,600m as detailed in PAN 75.</p> <p>The existing Craigiehall House (Grade A) would lend itself to a boutique hotel, located on the edge of the new local and commercial centre. It is</p>

	located directly off the A90 arterial route. The support for such facilities is therefore welcome and our proposal conforms with the preferred choice.
15A	Agreed -no comment.
15C	Agreed and justified by the Commercial Needs Study. New local centre providing convenience provision and walk in services for the development
15D	No comment – as a general point we would like to see as much policy within the LDP rather than Supplementary Guidance or non-statutory guidance.
15E	Agree. Craigiehall house is a feasible and viable hotel location which meets the policy criteria and accessibility requirements in proximity to a new local centre. Refer to Craigiehall Village Masterplan
15F	No comment - insufficient detail and duplication with the policy approach in 15D above.
16. <i>Delivering Office Business and Industry Floorspace</i>	<p>Having had regard to the Commercial and Industrial Needs Studies it is clear that Craigiehall can make a valuable contribution to employment provision in the north- west of Edinburgh.</p> <p>The existing estate at Craigiehall already contains offices and employment land. Proposals at Craigiehall would assist in compensating for the loss of office, business and industrial office floorspace elsewhere in the city and therefore comply with the objectives of Choice 16.</p> <p>Craigiehall can accommodate employment uses as part of a mixed-use approach within an accessible area well served by public transport. New business space can be provided as the redevelopment of the site serving a local catchment.</p> <p>The delivery and redevelopment of such space will only work as part of a mixed-use approach with partnership with the MoD as part of a comprehensive plan for the whole site.</p>
16A.1	No objection to this – Craigiehall is well located to serve the key locations at Edinburgh Park / South Gyle as well as the city centre. Allocation of the site would facilitate public transport links.
16A.2	As part of a residential / mixed use Craigiehall has the potential to become a commercial centre in its own right. This would be focussed at the neighbourhood hub.
16A.3	No comment.
16A.4	No comment.
16A5	Agree and would support Craigiehall as a potential accessible location on the edge of the urban area. The requirement for housing on brown-field urban sites is likely to force office location to the urban edge.
16B	Support. Craigiehall as a location provides the opportunity for office development given the availability of existing office provision and associated accommodation within the estate.
16C	Support subject to the specifics of the policy requirement in relation to loss of space. Craigiehall provides an opportunity for the retention of office space as part of a mixed-use development outwith the city centre.
16E	No comment.
16F	Qualified agreement subject to specific details. Craigiehall contains existing business space which could be considered as part of this policy. Re-provision of flexible business space is possible through a comprehensive re-

	development of the site as part of a mixed-use approach. This could be privately delivered through an appropriate allocation / consent. Refer to the Craigiehall Village Masterplan.
16G	Agree -however the Emp 8 schedule of sites is restrictive and will not allow for sufficient re-provisioning of business space across the city. The range and choice of sites needs to be extended on a city-wide basis.
16H	Support in principle subject to clarity on specifics and the proposed planning criteria. Craigiehall could be considered as a potential location for a hub given its location and logistical characteristics

1.38 It can be clearly seen that the masterplanned development of Craigiehall helps achieve the objectives in relevant Choices and complies with the underlying objectives being pursued by the City Council.

### Effectiveness and Sustainability

1.39 Guidance on the assessment of sites, in terms of defining their 'effectiveness', is contained within Planning Advice Note (PAN) 2/2010 'Affordable Housing and Housing Land Audits' (Scottish Government, 2010). This is critical factor locally in West Edinburgh and in relation to the uncertainty of a proportion of the city's land supply.

1.40 Craigiehall is effective or capable of becoming effective in the immediate 5-year period of City Plan 2030. An Effectiveness Matrix is set out below to demonstrate the effectiveness and consequently the likelihood of deliverability and implementation of the Craigiehall site for residential-led development.

### Effectiveness Matrix

PAN Criteria	Evaluation and Comment
i. Ownership	<p>The Site is owned in part by a single landowner REP and in part by the MoD. This allocation is being proposed by a national developer and strategic land provider.</p> <p>Consultations between the owners are continuing with a view to delivering a single coherent masterplan on the back of a PPP consent. An appropriate allocation will effectively ensure co-ordinated development at an appropriate time.</p> <p>The site is capable of being developed by a number of house builders and developed in the short and medium term, subject to planning permission being granted. Should PPP be granted, it is likely that early phases of housing development could be achieved in the 5-year period.</p>
ii Physical Conditions	<p>There are no known constraints on the land that would preclude development as proposed.</p> <p>It is understood that the site conditions are suitable for construction. In relation to technical matters:</p>

	<p>Access and egress can be achieved on to the existing adopted road network in accordance with local highway standards.</p> <p>There would be no flood risk from the development, the proposals can be drained, and the SUDS strategy would not affect adjacent housing. Surface water run-off would be restricted to a maximum of greenfield run-off to avoid discharging additional surface water.</p> <p>A Drainage Impact Assessment (DIA) will likely be required at the full planning stage; and</p> <p>Abnormal costs have been identified, and the development is able to fully fund the cost of infrastructure as part of the development programme.</p>
iii. Contamination	<p>The previous use of the majority of the site has always been agriculture. It is unlikely that there is any contamination on this part of the site.</p> <p>Any contamination in relation to the MoD land will need to be remediated by the MoD prior to its disposal.</p>
iv. Deficit Funding	<p>There is no requirement for public funding to make the residential and mixed-use development financially viable.</p> <p>Private housing development will contribute to affordable housing and developer contributions towards educational and transport infrastructure improvements where necessary. It will therefore boost the financial resources within the Action Plan and Programme for community and physical infrastructure.</p> <p>The development of all land and supporting infrastructure will be privately led.</p>
v. Marketability	<p>The site is being promoted by a national developer, proving that the site is in a very marketable location.</p> <p>It is capable of attracting a range of housebuilders and specialist providers to achieve high completion rates.</p> <p>The site would form part of Edinburgh's land supply and will also contribute to the overall housing requirement, therefore reducing any current or emerging deficit for market and affordable housing.</p>
vi. Infrastructure	<p>There are no known infrastructure constraints and the site can be adequately serviced from Burnshot Road and the A90:</p> <p>Surface water run-off is limited to greenfield discharge. The SUDS strategy will be developed and will include two levels of treatment for roads, porous paving and attenuation basins.</p> <p>Drainage provision will be made in conjunction with Scottish Water following a DIA to determine capacity and any downstream re-enforcement.</p> <p>A full DIA for the Foul Water discharge and Water Impact Assessment will be required at the appropriate time; and</p> <p>Developer contributions will be provided to assist in wider transport network improvements as detailed in the ELDP Action Plan.</p>
vii. Land Use	<p>This is a housing-led proposal and housing is the primary use.</p> <p>For a housing development of this scale a number of supporting services and facilities are required in order to make it sustainable and efficient.</p> <p>Detailed feasibility and viability appraisals will be undertaken in connection with phased development.</p>

- 1.41 Importantly, Craigiehall is in the ownership of two parties and has a willing developer in the form of Hallam Land. Discussions and negotiations have commenced about the best way to develop the land and an early start could be made.
- 1.42 It is in a highly marketable location and would allow two or more housebuilders to operate simultaneously to deliver 150-160 houses per annum. This allows for the land to be incorporated into the SHIP and facilitates the delivery of affordable stock at a 35% ratio.
- 1.43 The scale of development and critical mass being planned for allows on site infrastructure health and educational facilities. Development of the brown field land would be enabled by greenfield release and allow the cost-effective provision of services and utilities. It would facilitate improved public transport services through increased patronage.
- 1.44 The West Edinburgh Action Plan is not demonstrably feasible or economically viable. Allocation at Craigiehall would allow a significant financial injection through the combination of private and Council capital receipts.
- 1.45 None of the other proposed greenfield releases in the market or blended choices can support this level of self-sufficiency.
- 1.46 SPP has a clear presumption in favour of sustainable development. The Sustainability Matrix below identifies how the proposal at Craigiehall complies with the SPP sustainability principles.

### Sustainability Matrix

- 1.47 Given the importance of Sustainability placed within the LDP we have represented the Sustainability Matrix presented to CEC for the Craigiehall Planning Application. Unlike the rather random evaluation criteria used by CEC, this references directly to Scottish Government Sustainability Principles as derived from SPP (Paragraph 29).

Sustainability Principle	Development Proposal Compliance
Giving due weight to net economic benefit;	<p>There will be significant net economic benefit through a number of mechanisms such as developer contributions towards education and affordable housing; CEC revenue from new Council Tax receipts will be significant (circa £3.5m annually); increased local population to support the new and local facilities within proximity.</p> <p>Estimated investment of £100 million for the project. Approximately 500 direct person years of employment during construction phase.</p> <p>New commercial and community activities creating in the region of 207 new jobs, generating a GVA effect of £8.26 million per annum. An approximate additional £24.75 million per annum in retail spend.</p>

Responding to economic issues, challenges and opportunities, as outlined in local economic strategies;	Edinburgh Economic Strategy 2018 - The proposals respond to both national and local strategies relating to the provision of housing, and in particular the provision of a mix and choice of housing. There is a deficit in the provision of affordable housing and the proposals would provide a significant contribution towards this provision.
Supporting good design and the six qualities of successful places;	This proposal presents an ideal opportunity for the developer and CEC to work together through the detailed design stages to promote and showcase good design and qualities of place.
Making efficient use of existing capacities of land, buildings and infrastructure including supporting town centre and regeneration priorities;	<p>The scheme is proposed on both brownfield and greenfield land. Now that the MoD facility is vacated it can be timeously re-developed, retaining key buildings and existing housing (78 units).</p> <p>The loss of agricultural land would not undermine the viability of the wider agricultural holding.</p> <p>The proposals will be supported by existing infrastructure and will not require significant investment to allow the provision of much needed homes.</p>
Supporting delivery of accessible housing, business, retailing and leisure development;	<p>Supports the housing strategy and will comply with affordable housing policy. The site is located on the existing highway network, core path network and will be supported by a new village core providing business, commercial and community facilities.</p> <p>The West of Edinburgh is identified as a strategic location for the delivery of a significant quantum of accessible housing, business, retailing and leisure development. There will be clear opportunities for residents of the proposed housing development to be employed directly or indirectly in nearby locations as a result.</p>
Supporting delivery of infrastructure, for example transport, education, energy, digital and water;	<p>It provides much needed housing and will provide all necessary site infrastructure to support its operation. A primary school will be provided, potentially with a Secondary School site as part of an educational campus. As will a Park and Ride facility to serve the city.</p> <p>Contributions will be made to wider transport infrastructure interventions, as identified in the ELDP Action Plan. In addition, a much needed Park and Ride facility can be provided to serve the city.</p>
Supporting climate change mitigation and adaptation including taking account of flood risk;	Flood risk has been assessed in detail and appropriate mitigation (in agreement with SEPA) will be proposed.
Improving health and well-being by offering opportunities for social interaction and physical activity, including sport and recreation;	<p>The site is located within very close proximity to the Core Path Network. Opportunity exists to link the development directly to these networks and to create more formal circular routes within this area of the city for use by existing and future populations.</p> <p>Opportunity exists to provide space for local community facilities. This may take the form of a village hall, meeting rooms, or GP/dentist facility.</p>

Having regard to the principles for sustainable land use set out in the Land Use Strategy;	It is demonstrated in this Table that this site is in a sustainable location. This is further evidenced by the allocations for housing and mixed uses in the west of the city adjacent to the site.
Protecting, enhancing and promoting access to cultural heritage, including the historic environment;	The proposals do not impact on any existing access privileges or routes to cultural heritage resources. Indeed, the existing assets have not been accessible to the public, being within the secure MoD facility. Listed buildings within the site will be retained and redeveloped for alternative uses, thus allowing the public to enjoy these important assets.
Protecting, enhancing and promoting access to natural heritage, including green infrastructure, landscape and the wider environment;	Proposals for new open space, green infrastructure and landscaping within the design will comply with standards. The site is located on the Core Path Network. The proposals do not impact on any existing routes which afford access to greenspace and natural heritage, on the contrary it will enhance opportunity and provision within the area.
Reducing waste, facilitating its management and promoting resource recovery; and	Recycling and refuse facilities will be incorporated into the design and collection of waste will be undertaken in line with local authority procedures.
Avoiding over-development, protecting the amenity of new and existing development and considering the implications of development for water, air and soil quality.	The impact of the development will be controlled through the careful design, siting and use of finishes. This will be enforced through planning conditions.

1.48 Of particular importance are the obvious cross references to the aims and objectives of the LDP Choices Report as well as SPP. Fundamentally the site makes the best use of existing land and infrastructure which has already been subject to development. It would make a major contribution to affordable housing provision and allow economic development to continue on site. Importantly it facilitates the preservation of Craigiehall House and the management of the designated landscape in accordance with the wishes of HES.

1.49 The landscape setting of the city would not be compromised, and indeed active transport links would be enhanced linking other parts of West Edinburgh. The site would make provision for a Park and Ride as part of the Green Transport Plan.

### **Spatial Strategy and Comparators**

1.50 We do the preferred spatial strategy (urban area) or the land requirement underpinning this is realistic or deliverable over the plan period to 2032 and consider that a more ambitious and expansive blended approach is required to accommodate continued growth. This should particularly be the case in this sector of the city given its strategic importance for economic growth and housing.

- 1.51 The Environmental Report assesses the 3 Options identified in Choice 12. The preferred option stated as being all new housing development delivered by the Council and its partners within the urban area, in order to minimise greenbelt release to reach the affordable housing target. There are two reasonable alternatives. However, there is no real conclusive evidence as to what option would have less impact on the environment, the Council stating that most impacts are uncertain at this time.
- 1.52 The Council considers that, by implementing Place Briefs and further assessment, the potential impacts of brownfield sites can mostly be mitigated. It goes on to state that Greenfield sites are likely to have greater impacts and although some of this can be mitigated through the provision of new infrastructure the longer commuter distances means there is a potential risk of additional vehicle trips and associated impacts, even with mitigation. We do not consider that this is a balanced or accurate reflection of the potential or likely impacts of each option and there appears to be no option that is better than the other in environmental terms.
- 1.53 There are a number of comparator greenfield sites within the MIR Choices Report that are included in the 'greenfield' and 'blended' alternative approaches which run completely counter to the four objectives of the plan and are wholly unsustainable in nature largely due to their location. Indeed, these sites would actively encourage the use of the car for commuting and run counter to climate change and zero carbon strategies being pursued by the Council.
- 1.54 Remarkably, Craigiehall does not feature in either of these options and would represent a more sustainable development aligned with the plans key development aims as well as relieving pressure on the urban periphery of the city where investment and mitigation is required. We strongly object to the spatial strategy on the basis of the site appraisals that discredit the preferred and alternative approaches suggested by the Council. This is particularly in respect of outlying sites at Kirkliston and Calderwood (West Lothian) which will not contribute to the LDP objectives. The latter has particular cross boundary and a funding challenges in respect to education and transport in particular.
- 1.55 The site assessment undertaken by the Council for Craigiehall in itself is contradictory as it appears to confer a degree of development status only to the land owned by the MoD. This is contrary to our discussions with CEC on several levels but primarily regarding residential amenity and potential noise considerations. We have therefore submitted a modified version based on our EA for the site together with an updated Craigiehall Masterplan.
- 1.56 When compared to Conifox and Carlowrie in Kirkliston the MIR Choices evaluation states:
- "The site is considered suitable for development, despite not being within the SESplan Strategic Development Areas as set out in its spatial strategy and poor accessibility. 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. Only a small part of the site is considered developable and this should be considered alongside adjacent sites at Carlowrie Castle and Craigbrae.*

*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. 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 the network, as well as nearby Foxhall House and the River Almond which are considered as potential landscape-scale component 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.***

- 1.57 This represents a simple manipulation of urban boundaries without any real regard to the quality of the opportunity or real constraints affecting these areas. In addition, there are number of high-profile green belt/ designated landscape releases over recent years in Edinburgh notably at Edmonstone House and Estate. These decisions through approvals and appeals demonstrate that development can be successfully accommodated into designed and policy landscapes.
- 1.58 Contrary to the MIR objectives no regard has been given to the wide range of socio-economic and environmental benefits that Craigiehall can bring to the city. These include transport, infrastructure community facilities and new primary and secondary school facilities on the edge of the city relieving existing catchments with available land. These facilities together with a mixed-use development are key to reducing carbon emissions and offsetting carbon emissions.
- 1.59 In addition, Craigiehall can contribute to existing and new infrastructure exactly where it is needed and assist in relieving pressures on West Edinburgh as well as contributing financially to community infrastructure in this part of the city.

## Conclusion and Recommendation

- 1.60 Scottish Planning Policy requires that planning authorities prepare LDPs for their area and keep these up to date. It also seeks to make the best use of land and this proposal is focussed on that principle with a presumption in favour of sustainable development and design quality which is demonstrated through the Craigiehall Masterplan.
- 1.61 Hallam Land considers that Craigiehall should be allocated Within the Proposed LDP2 in order to meet the housing requirement for the plan period up to 2030. It responds to the overall housing land requirement over the plan period and will assist in maintaining a 5-year land supply in accordance with SPP.
- 1.62 We do not believe that the Council's preferred strategy of relying on brownfield sites to meet the housing requirement is feasible or realistic in meeting demographic pressures. Furthermore, planning for housing land has taken place within a strategic policy vacuum and with a legacy of the city not meeting its requirement in full. We therefore object to Choice 12 and contest the housing land target and proposed allocations as part of the spatial strategy which also relates to Choice 14 West Edinburgh.
- 1.63 As SESplan 2013 and the related Housing Supplementary Guidance are both more than 5 years old, they must be considered to be out of date rendering housing supply targets in LDP 2016 no longer relevant. The SDPA and the Reporter in the SESplan2 examination consider that weight should be given to the housing supply targets in HNDA2, but no requirement set by the SDP itself. On the basis that these supply targets in the HNDA2 are used, there would inevitably be a shortfall in the effective housing land supply.
- 1.64 Craigiehall makes a natural and logical extension to the city and can provide market and affordable housing in the short, medium and long term. This was recognised in the Examination Report to LDP 1 with a specific recommendation from the Reporter. The site can provide @1200houses as well as related infrastructure and community facilities. It should therefore be included as part of a revised Policy H1 in the LDP 2.
- 1.65 Craigiehall also now benefits from a comprehensive Environmental Assessment with full technical evidence on key matters related to feasibility and viability for both the MoD and greenfield land. It is accompanied by a fully worked up and modified masterplan demonstrating the scale and mix of development.
- 1.66 Within SPP there are 13 principles (paragraph 29) which assist in determining whether a development contributes to sustainable development. It is considered that the Craigiehall site fully conforms to the principles in respect of economic environmental and social benefits including the potential for 35% Affordable Housing. It therefore is in alignment and conforms to the underlying objectives and preferred choices in LDP 2.

- 1.67 Design of the proposals reflect existing approved developments in the area and the layout demonstrates the six qualities of successful places. Proposed development makes efficient use of the capacity of the brownfield land, having regard to the Council's design policies and will support the delivery of the greenspace / parkland within heritage policies.
- 1.68 Design, layout and construction of the housing will accord with current placemaking policies, the Urban Design Guidance and building regulations on climate change. There is no flood risk to or created by the developments and the necessary infrastructure is available to support development.
- 1.69 Craigiehall is on the A90 corridor as identified by the Sustainable Transport Study. It is accessible by a range of transport modes and located within walking distance of local services and existing and proposed employment centres. Further the development provides opportunities to link the internal network to the existing pedestrian, cycle and public transport networks within West Edinburgh. Development therefore complies with the principles of sustainable land use without over reliance on commuting as advocated by the City Mobility Plan.
- 1.70 Supporting documents in the ES, demonstrate that the green space, landscape and wider environment will be protected and enhanced and access to it will be promoted. Without funding proposed by the developer the viability of the proposed greenspace is in doubt.
- 1.71 The site is also located adjacent to the West Edinburgh SDA and thus accord with the spatial strategy of the development plan up to 2026. Thereafter emphasis should be placed on the A90 corridor which includes Craigiehall adjacent to a sustainable transport route. The site is accessible by a range of transport modes and located within walking distance of local services, with opportunities to link into existing networks.
- 1.72 The environmental assessment required as part of Scottish Ministers' Report on the previous LDP demonstrates that the proposals conform with relevant environmental and design policies in the LDP 2016 and related Supplementary Guidance. The layout and design of the developments reflect the surrounding developments, in line with Urban Design Guidance.
- 1.73 Development would not have an unacceptable impact on the Green Belt objectives. The proposals accord with the principles and aims SPP and will help to deliver the Central Scotland Greenspace Network. It is therefore submitted that the proposals conform to development plan policies and is justified by the monitoring and associated reports underpinning the MIR including the SEA and Environmental Reports. Allocation would be consistent with the approach adopted in respect of other developments and precedents across the city over recent years.
- 1.74 Allocation of land at Craigiehall would satisfy greenfield and brownfield housing supply objectives and contribute to a balanced spatial strategy that has a higher level of greenfield

release to contribute to the housing supply target. It is an efficient use of land, utilising existing infrastructure and can relieve existing pressures in West Edinburgh. The environmental evidence and Craigiehall Masterplan demonstrate that a feasible and viable development with the MoD could take place and assist in protecting Craigiehall House and existing landscape designations.

- 1.75 For the reasons specified above Hallam land therefore requests that The City Council reviews its position and allocates Craigiehall within the Proposed City Plan 2030 as part of a more generous land supply for housebuilding in the city, thereby enabling housing targets to be met in full.

### **RFA Development Planning**

# Appendix 1 - Craigiehall Assessment Tables

## Introduction

This Appendix of the representation provides the City of Edinburgh Council with a balanced and informed assessment of the Craigiehall site in terms of its characteristics and acceptability for development. The appraisal is informed by detailed surveys, consultee comments and opinions, many of which are a result of the preparation and determination of planning application ref 18/10545/PPP for the site.

CEC has presented a number of site assessments of Craigiehall in the preparation of the Choices document. Those considered in this reassessment are as follows and are discussed in turn further below.

- Landscape and Visual Assessment. LCA 21 Craigiehall policies (p58).
- Edinburgh Strategic Sustainable Transport Study - Phase 1. Table 5.2 and 5.3.
- Housing Study. Greenfield Site Assessment: Craigiehall (page 268).

## Landscape and Visual Assessment

The Council's assessment is provided below in Table A1 for reference.

**Table A1 - Extract from Council Assessment**

Sector 5: Landscape and Visual Assessment			
Landscape Character Area and key characteristics	Council assessment areas included in LCA	Key factors considered in initial assessment	Assessment and conclusions on scope for development
<p><b>LCA 21 Craigiehall policies</b> The designed landscape of Craigiehall is sited on the gently sloping south-facing slopes of the Lower Almond Valley, on the western periphery of Edinburgh. Many of</p>	<p><b>21</b> Craigie Hall</p>	<p>Ancient woodland Flood risk (minor part to S)</p>	<p>Although landscape constraints apply to much of this LCA, the designed landscape has been affected by built development associated with the army HQ. This development comprises MOD housing, much of which has</p>
<p>the original features of the designed landscape have been affected by the construction of barracks, housing and offices associated with the use of the estate as an army HQ. An avenue of cedar and oak, mainly planted during the 19<sup>th</sup> century, borders a long drive, to the east of the house. Parkland on the lower slopes, adjacent to the River Almond, is still present although influenced by residential development around its edge. Public access is restricted although parts of the parkland can be seen from the River Almond Walkway.</p>		<p>Craigiehall Inventory site</p>	<p>been carefully designed to minimise effects on the parkland, and some denser development close to Craigiehall House. Policy woodlands provide some screening of the MOD development within the estate. This LCA contributes to the swathe of policy influenced landscapes (including Cammo and Dalmeny) which provide a distinctive and high-quality setting to north-west Edinburgh. The eastern part of the estate is highly visible from the A90 and there are also elevated views from Craigie Hill and the B9080. Extensive and dense housing development within this LCA would breach the robust settlement boundary provided by the deeply incised and wooded River Almond. While the lack of public access to this landscape inhibits connectivity, policy woodlands contribute to the green network in terms of biodiversity value. There is <b>very limited scope</b> for housing, but only as a replacement for existing MOD development. This is in order to conserve the character of the designed landscape, limit visibility and protect the high-quality landscape setting of north-west Edinburgh. Housing should be low-rise and low density and should be located in less visible parts of the landscape, where existing woodland provides screening. Reinstatement and management of parkland and woodlands should be a prerequisite of any development proposals in this area.</p>

The Council's assessment has not been informed by detailed appraisal or assessment. In support of application 18/10545/PPP a full landscape and visual assessment was undertaken

by the applicant, in line with recognised guidance. Furthermore, high quality photomontages were prepared from CEC agreed viewpoints and these clearly demonstrate the limited visibility of a housing development from key vantage points.

We agree with the commentary in the first column describing the Landscape Character Area and key characteristics of LCA 21 (page 58). In particular we agree with the Council's statement "*the original features of the designed landscape have been affected by the construction of barracks, housing and offices associated with the use of the estate as an army HQ*".

We do not agree with the statement that "*the eastern part of the estate is highly visible from the A90*". This is not the case. Natural topography, screen planting and embankments minimise the visibility into the site from the A90. There are glimpses afforded into the eastern part of the site from a few key locations along the A90, but the site is definitely NOT highly visible.

Neither do we agree that there are "*elevated views from ... the B9080*". Given the landscape framework and structure there is only one glimpse afforded into the site from near the junction with Craigies Farm access on the B9080. A view across the two most north eastern fields within the site is currently afforded from the Burnshot Road Bridge area. These are certainly not 'elevated' views, and only a small portion of the site is visible from this location.

We agree that the site forms part of a '*swathe of policy influenced landscapes*' in the area. The Craigiehall site is not unique in this part of Edinburgh and other adjacent areas also help to provide a setting to the City.

The high quality photomontages prepared from CEC agreed viewpoints, in support of the aforementioned planning application, clearly show that development of the site would not be highly visible, would not alter the strategic GDL framework and would not significantly impact on the setting of the City.

To achieve a housing led development in this location would indeed require the reinstatement and management of parkland and woodlands, as suggested in the Council's assessment. This is a key principle that has informed the Indicative Masterplan prepared for the site and submitted with this representation.

We do not agree that there is only "*very limited scope for housing*". This should be altered to '**some scope**'. A carefully designed high quality housing led development could still conserve the structure of the designed landscape. Conserving this landscape structure will limit visibility of development from key viewpoints and transport networks. The landscape setting of north-west Edinburgh would remain, albeit with a revised defensible greenbelt boundary at Burnshot Road.

## Edinburgh Strategic Sustainable Transport Study

The Craigiehall site lies adjacent to, and is accessed from, the A90 trunk road. This road is recognised in the Study as a major strategic corridor, a key arterial route, between Edinburgh and Fife (and the north of Scotland).

Table 4.1 of the Study recognises the capacity issues and constraints of this route and also identifies the emerging development pressure at Craigiehall. Given its strategic nature and importance the A90 improvements and interventions are to be considered in the emerging STPR2, rather than CityPlan 2030.

Of particular interest and note is the identified opportunity for a Park and Ride site along the A90 corridor in support of the existing P&R sites at Ferrytoll and Halbeath which, as the Study states, perform extremely well. The proposals at Craigiehall offer land for such a facility and has been identified on the Indicative Masterplan prepared. This opportunity has not been recognised in the MIR (Map 4).

Table 5.3 states that growth in the City is not currently constrained by transit on this route. Furthermore, the Council indicates in the Table that a priority should be a focus on A90 as a strategic corridor catering for both private and public transport. Neither currently nor in the future is transit on the A90 considered to be a constraint to development at Craigiehall. On the contrary, development at Craigiehall can contribute significantly to achieving and facilitating important transport interventions that are likely to be required.

The Council's assessment and scoring are replicated below in Table A2. The promoter's assessment is provided in Table A3.

**Table A2 – CEC Transit Assessment - Summary Findings**

Corridor	Base demand	Development Demand (existing LDP)	Accessibility to support new areas for development in sustainable manner	Baseline Inequality (Scottish IoMD)	Route alignment feasibility	Attractiveness to passengers (proxy for Value for Money)	Score (unweighted)	Suitability for tram / transit (Y / N)
New Town to Granton via Newhaven (1)	2	3	0	2	2	1	10	Y
Portobello / M'burgh (2)	2	2	0	2	1	1	8	N
South East via Bio-Q (3)	3	3	3	3	2	2	16	Y
Straiton (4)	2	1	2	2	1	1	9	N
South Suburban (5)	2	1	0	2	1	1	7	N
Granton (6)	2	3	1	3	2	2	13	Y
Newbridge (7)	1	2	3	1	3	2	12	Y
West of Hermiston (8)	1	1	3	1	3	2	11	Y
Queensferry (9)	2	1	2	1	1	1	8	N
W Edin North – South (10)	1	1	2	2	1	1	8	N

**Table A3 - Promotor’s Transit Assessment (Queensferry 9)**

Corridor	Base Demand	Development Demand	Accessibility to support new development	Baseline inequality	Route alignment feasibility	Attractiveness to passengers	Score	Suitability for transit
							14	Yes

Base Demand must surely be of the highest level given the recognition that this is the most used route into/out of the City and flows are getting even higher, particularly given the Queensferry Crossing. The Council relies on existing LDP development sites to score Development Demand. This should not be the case and it should be assessed on the effectiveness and market attractiveness of sites, regardless of whether they are allocated in the existing LDP. There is evident demand for up to 1200 homes and mixed uses on the Craigiehall site.

Public Transport passengers are clearly attracted to the A90. This is recognised by the Council in the statement that the Fife Park and Ride sites work extremely well and may need expanding. The Council marks this category as ‘low’ which is clearly not the case.

The capacity at the Barnton Junction is clearly a significant restriction which the Council has marked the Queensferry 9 route down for. However, without improvements to this junction the entire West Edinburgh expansion is compromised.

### Housing Study

Assessment Sites were assessed against defined criteria based on SDP1 spatial strategy and policies, National Planning Framework developments and Scottish Planning Policy. Figure 1 of the Housing Study sets out the criteria, the policy background for each of the criteria, and the methodology and sources used to determine the criteria.

The Council’s assessment is presented below in Table A4.

**Table A4 – CEC Greenfield Site Assessment**

SDP1 SDA AREAS	
<i>Does the site fit within an area identified as a strategic development area?</i>	<b>No</b> – The site is not within an identified SDA.
ACTIVE TRAVEL	
<i>Does the site support travel by foot to identified convenience services?</i>	<b>No</b> – The site is not within walking distance to local convenience services, apart from the Craigie Farm shop which cannot provide an appropriate level of amenity. It is unlikely that access can be improved and convenience services are unlikely to be provided on the site due to lack of scope for development nearby.
<i>Does the site support travel by foot to identified employment clusters?</i>	<b>No</b> – The site is not within walking distance to employment clusters. It is unlikely that access can be improved and employment clusters are unlikely to be provided on the site due to lack of scope for development nearby.
<i>Does the site have access to the wider cycle network?</i>	<b>Partially</b> – The site has access to the wider cycle network but access is impeded by the Burnshot Bridge which is still under construction.
<i>Can the site support active travel overall through appropriate intervention?</i>	<b>No</b> – The site would not support active travel overall, as the site is not within walking distance of local convenience services and employment clusters and these are unlikely to be provided through development due to lack of scope for development nearby.
PUBLIC TRANSPORT	
<i>Does the site support travel by public transport through existing public transport network accessibility and capacity?</i>	<b>No</b> – The site does not support travel by public transport based on existing or incrementally improved provision.
<i>Is the site potentially served by an identified public transport intervention project which is deliverable in the plan period to serve and accommodate development?</i>	<b>No</b> – The site does not support travel by public transport based on an identified intervention.
COMMUNITY INFRASTRUCTURE	
<i>Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?</i>	<b>No</b> – The site does not have sufficient primary school infrastructure capacity.
<i>Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?</i>	<b>No</b> – The site does not have sufficient secondary school infrastructure capacity.
<i>If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?</i>	<b>No</b> – 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. There is not enough scope for development on this and nearby sites to support this level of intervention.
LANDSCAPE CHARACTER	
<i>Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?</i>	<b>No</b> – No scope is identified for development on this site due to its contribution to the setting and character of North-West Edinburgh, its highly visible location as seen from the A90, Craigie Hill and the B9080 and any development breaching the robust settlement boundary formed by the River Almond valley. Existing MOD housing exists on the site and limited scope is identified for low density housing to replace the existing MOD buildings only.
GREEN NETWORK	
<i>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?</i>	<b>Partially</b> – The site is of value for the strategic green network, due to lying within an area identified as a green network opportunity adjacent to the River Almond. Reinstatement and management of parkland and woodlands has been identified as a prerequisite of any development proposals on this site.
FLOOD RISK	
<i>Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?</i>	<b>Partially</b> – Part of the site has SEPA-identified areas of medium-high flood risk and areas of importance for flood management, limited to the south along the River Almond floodplain.
SUMMARY COMMENTS	
<i>Is the site suitable for development?</i> <b>No</b> The site is not suitable for development due to its poor accessibility, community infrastructure capacity, landscape constraints, visibility and separation from existing settlements.	

The Site is appraised by the promoter below against CEC's own criteria and also SPP to assess its appropriateness as a preferred allocated site for housing led development. Given the promoter's knowledge of the site and background information available it can be demonstrated the none of the assessment categories warrant a 'No'/red scoring.

**Table A5 – Promoter’s Greenfield Site Assessment (Craigiehall)**

SDP1 SDA AREAS		
Does the site fit within an area identified as a strategic development area?		Not Relevant or appropriate to this LDP review
ACTIVE TRAVEL		
Does the site support travel by foot to identified convenience services?	Yes	Proposals will create additional local commercial and convenience facilities at the heart of the development. Very few of the greenfield sites in west Edinburgh score highly on Active Travel. Craigiehall has the advantage that new convenience services will be provided on site to cater for newly created neighbourhood, therefore no reliance on existing services.
Does the site support travel by foot to identified employment clusters?	Partially	Not to existing clusters, but if development was to progress some employment uses (Class 1, 2 and 3) will be developed on site as part of neighbourhood centre and through reuse of retained buildings.
Does the site have access to the wider cycle network?	Yes	Direct Access to adjacent National Cycle Network via underpass off Primrose Drive. Upgraded route using Burnshot Bridge now completed.
Can the site support active travel overall through appropriate intervention?	Yes	The site will be developed to have new convenience stores and services within a new neighbourhood centre. The Council’s Active Travel Team sees the merits in the location of Craigiehall and the value nearby travel networks can bring to the site.
PUBLIC TRANSPORT		
Does the site support travel by public transport through existing public transport network accessibility and capacity?	Yes	There are 6 bus stops adjacent to the eastern boundary of the site on the A90. An existing underpass links the site directly to one of the city-bound bus stops.  Furthermore, the site itself will be served by a bus service which will be funded by the developer from the first phase of development.
Is the site potentially served by an identified public transport intervention project which is deliverable in the plan period to serve and accommodate development?	Partially	The ESSTS does not specifically consider or assess such interventions. Given the importance and strategic nature of the A90 these interventions are to be considered at a national level in the STPR2.  The Council scoring for this category as ‘No’ is therefore incorrect. Just because interventions are not assessed in the ESSTS this should not devalue the interventions being proposed in STPR2.
COMMUNITY INFRASTRUCTURE		
Does the site have sufficient primary school infrastructure capacity to accommodate the	Yes	A primary school will be provided on site to cater for pupil product.

development without further intervention?		
Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?		<p><i>Partially</i></p> <p><i>This depends on the outcome in relation to CEC's plans for a new West Edinburgh Secondary School and catchment alterations.</i></p> <p><i>It may be that a site can be provided at Craigiehall to relieve pressures in West Edinburgh. A potential site is identified on the Indicative Masterplan.</i></p>
If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?		<p><i>Yes</i></p> <p><i>Provision of an on-site primary school and potential for providing a site for a new West Edinburgh secondary school.</i></p> <p><i>To be explored with CEC.</i></p>
<b>LANDSCAPE CHARACTER</b>		
Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?		<p><i>Partially</i></p> <p><i>A natural extension to the Almond Valley, Cramond and Strathalmond. No coalescence will result. As with all major allocations the character of the existing urban edge will alter. Biodiversity and leisure interests will be enhanced by opening up this whole area as a managed landscape for benefit to the public. Existing MOD housing exists on the site, future housing development is not ruled out by the Council.</i></p> <p><i>We do not agree that there is only "very limited scope for housing". This should be altered to 'some scope'.</i></p>
<b>GREEN NETWORK</b>		
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?		<p><i>Partially</i></p> <p><i>The site is of existing value for the strategic green network due to lying within an area identified as a green network opportunity adjacent to the River Almond. At present the site is not accessible to the public. Reinstatement and management of parkland and woodlands are to be incorporated into any development proposals to open up the site to the public and to improve this for biodiversity.</i></p>
<b>FLOOD RISK.</b>		
Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?		<p><i>Yes</i></p> <p><i>The River Almond floodplain has been modelled and would remain undeveloped (see Indicative Masterplan). SEPA has no objection to Indicative Masterplan.</i></p>
<b>SUMMARY COMMENTS</b>		
Is the site suitable for development?		<p><i>Yes</i></p> <p><i>The site is a natural extension to the urban area in north west Edinburgh where connectivity already exists. There is no landscape constraint and community infrastructure will be provided on site as part of the Masterplan.</i></p> <p><i>The site has the potential to provide sufficient community infrastructure capacity to support development and interventions have been identified to address this. Good active travel and transport links would be important. There is enough scope for</i></p>

	<i>development on this and nearby sites to support this level of intervention.</i>
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## Summary

The site assessments conducted by CEC did not provide an informed evaluation of the Craighall Site. No appreciation of the development proposals for the site was given and consideration of the mixed use nature did not inform the assessment. This is particularly important when considering proximity to convenience stores (which will be provided on site) or primary/secondary school capacity (which can be provided on site), for example.

The Council's assessment process was not completely robust and was inconsistent, leading to erroneous value judgements that are vague and unsubstantiated by any reliable evidence.

With the benefit of recent surveys, consultation and planning application responses a much more balanced appraisal of the site and its development impacts can be made.

The Craighall site represents a logical extension to the urban edge of north west Edinburgh. Due to the well informed design and layout of the Indicative Masterplan and due to the careful and considered scale, density and mixed of uses and transport interventions the development would fit neatly and sustainably into the landscape and an overall positive environmental benefit would be afforded as a result of development.

Table A6 provides a final summary of the assessment carried out by both CEC and the promoter. It is clear that with an informed assessment the site compares significantly better to many others within North West Edinburgh (Sector 6).

If CEC was to even concede just one score category this would then bring the Craighall site in line with others (eg Craigbrae and North Kirkliston) shortlisted as suitable for development. It is considered that omitting this important site for such a marginal score is a significant error and missed opportunity.

**Table A6 – CEC Summary against Promoter Summary (Sector 6)**

AREA NAME	SDP1 Strategic Development Areas	10 min walk to local convenience services	10 min walk to employment clusters	Access to wider cycle network	Active travel assessment (overall)	Access to existing public transport	Public transport assessment (overall)	Primary school capacity	Secondary school capacity	Community infrastructure assessment (overall)	Landscape character assessment	Green network assessment	Flood risk assessment	SUMMARY
Royal Burgess Golfing Society														
Bruntsfield Links Golfing Society														
Lauriston Farm														
Craigiehall														
Craigie Hill														
West of Craigie Hill														
Leuchold														
Easter Dalmeny														
Dalmeny Estate														
East Bankhead Farm														
East of Dalmeny														
West of Craigie Hill														
Carlouerie Farm														
Craigbrae														
Milton														
Conifox														
Carlouerie Castle														
Swineburn														
East of Heading Road														
West of Dundas House														
Westie Hamble														
Dundas Castle														
North Kirkkistoun														
Royal Elizabeth Yards														
<b>CEC Summary</b>														
<b>Promoter Summary</b>	n/a													