

Customer Ref: 00025 Response Ref: ANON-KU2U-GTXK-5
Name: Holder Planning
Response Type: Agent / Consultant
On behalf of: Murray Estates

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

Choice 1 A

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

Short Response: Not Answered

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

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: Not Answered

Explanation: There is not enough information given to agree or disagree. We support the principle of providing green and blue infrastructure where practical and affordable.

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Choice **1 C**

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

Short Response

Explanation

Choice **1 D**

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

Short Response

Explanation

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Choice 1 E

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

Short Response

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

Choice 1 F

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

Short Response

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

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Choice 1 F

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

Short Response

Explanation

Choice 1 G

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

Short Response

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

Choice 1 H

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

Short Response

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

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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

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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 Murray Estates support the aspiration to ensure the efficient use of land, and agree that areas with good public transport accessibility provide opportunities for increased densities. Our views are being sought on the following: 1. A minimum density of at least 65dph for all housing development; 2. A minimum density of 100dph in as yet unspecified locations which are identified for 'higher density development'; 3. A policy on a vertical mix of uses. We deal with these three matters below in turn. Minimum Density of 65dph Murray Estates and 7N Architects have considered the issue of density in some detail within the Hermiston Park Vision document and, subject to further discussion with the Council, have taken the following approach which can achieve an average density of 65 dwellings per hectare across the whole masterplan with a variety of housing typologies and neighbourhood characters. This has created higher density areas of apartment buildings and terraced houses at the core of the masterplan, focussed around new and existing green travel routes and proposed local centres. At the fringes of the masterplan, density reduces with a greater proportion of terraced housing complemented by semi-detached and detached dwellings. This creates a softer edge to the existing and proposed green buffers and landscaped areas. The approach enables a variety of housing densities, typologies and tenures to be delivered at Hermiston Park, which will be essential to establishing a diverse and successful community for inclusive growth. In conclusion, therefore, the Hermiston Park site does seem able to support an average density of approximately 65 dwellings/hectare. A Minimum Density of 100dph in Specific Locations We support prioritising certain locations for higher density development, although such high densities are likely to be more appropriate and viable on urban brownfield sites. Requiring a Vertical Mix of Uses This will be appropriate in some locations, although care needs to be taken on how this is implemented in detail given the possible tensions between business and residential uses in terms of amenity and building/fire regulations. In large scale mixed-use developments such as Hermiston Park, where a dense hub of commercial and residential uses is proposed, it is considered appropriate to locate commercial uses on the ground floor, thereby maximising footfall, vitality and visual interest. Residential uses are best located on upper floors. This of course is very typical of Edinburgh's older commercial centres. Hermiston Park includes provision for vertical mix of uses, however these are focussed around specific core areas of the masterplan. These will primarily take the form of ground floor retail and small business units within apartment buildings along the central pedestrian corridor, as well as the potential for larger mixed use developments with active ground floor uses at the local centre. There is also the opportunity for further "satellite" pockets of active ground floor uses that support the creation of a successful mixed-use place, in particular the development around the Union Canal to the north of the A71. As a general concluding point, although Hermiston Park can support 65 dwellings/hectare and the vertical integration of uses, we caution against policies that prescribe fixed approaches to such matters. In our view, there should be flexibility for developers and designers to respond to the local context and the market for different types of housing. We therefore suggest the following wording for a new policy on density. ALL NEW HOUSING SITES WILL BE EXPECTED TO BE DESIGNED TO ENSURE EFFICIENT USE OF LAND AND OPTIMISE HOUSING DENSITIES. THE APPROPRIATE DENSITY WILL DEPEND ON LOCAL CONTEXT. THE ACCESSIBILITY OF THE SITE TO PUBLIC TRANSPORT AND OTHER RELEVANT SERVICES, AND THE NEED TO ENCOURAGE AND SUPPORT THE PROVISION OF LOCAL FACILITIES NECESSARY TO

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HIGH QUALITY URBAN LIVING WILL SUPPORT INCREASED DENSITIES SUBJECT TO SITE SPECIFIC CONSIDERATIONS. THIS SHOULD BE ACHIEVED BY USING A FULL RANGE OF HOUSE TYPES AND SIZES.

Choice **2 C**

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

Short Response

Explanation

Choice **2 D**

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

Short Response

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Choice 3 A

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

Short Response: Not Answered

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

Choice 4 A

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

Short Response: Not Answered

Explanation See answer to Q4B

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Choice **4 B**

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

Short Response

Explanation

Choice **5 A**

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

Short Response

Explanation

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Choice 5 B

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

Short Response

Explanation

Choice 5 C

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

Short Response

Explanation

Choice 5 D1

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

Short Response

Explanation

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Choice 5 D2

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

Short Response

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

Choice 5 E

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

Short Response

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

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Choice **6 A**

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

Short Response

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

Choice **6 B**

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

Short Response

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

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Choice **7 A**

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

Short Response

Explanation

Choice **7 B**

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

Short Response

Explanation

Choice **7 C**

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

Short Response

Explanation

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Choice **7 D**

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

Short Response

Explanation

Choice **8 A**

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

Short Response

Explanation

Choice **8 B**

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

Short Response

Explanation

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Choice 8 C

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

Short Response

Explanation

Choice 8 C

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

Short Response

Explanation

Choice 9 A

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

Short Response

Explanation

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Choice **9 B**

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

Short Response

Explanation

Choice **10 A**

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

Short Response

Explanation

Choice **10 B**

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

Short Response

Explanation

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Choice **10 C**

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

Short Response

Explanation

Choice **11 A**

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

Short Response

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

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Choice **11 B**

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

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Explanation

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Choice 12 A

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

Short Response: Not Answered

Explanation

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

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

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

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

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

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

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

Choice 12 B1

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

Short Response: Not Answered

Explanation

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Choice **12 B2**

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

Short Response

Explanation

Choice **12 B3**

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

Short Response

Explanation

Choice **12 B4**

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

Short Response

Explanation

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Choice **12 B5**

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

Short Response

Explanation

Choice **12 B6**

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

Short Response

Explanation

Choice **12 B7**

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

Short Response

Explanation

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Choice **12 B8**

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

Short Response

Explanation

Choice **12 B9**

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

Short Response

Explanation

Choice **12 B10**

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

Short Response

Explanation

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Choice 12 BX

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

Short Response: Not Answered

Explanation

Murray Estates support the proposed development allocation, so far as it goes, at East of Riccarton in West Edinburgh. However, Murray Estates also control land immediately to the north of the A71, between the A71 and M8 Motorway, which in our view should also be included within the area being considered in Choices 2030 for residential led development. We have called this larger area 'Hermiston Park'. An expert technical team, led by 7N Architects, have prepared a comprehensive Masterplan Strategy for the site, which is submitted in response to Q12C on the response form. As explained in our answer to Q12A, none of the three housing land allocation strategies proposed in Choices 2030 will come close to meeting housing need and demand in Edinburgh within the plan period. The land identified north of the A71 which is currently excluded from the potential East of Riccarton allocation, as we explain below, has similar characteristics to the land identified within the East of Riccarton area, and we can therefore see no particular reason why it has been omitted from consideration when it could make a significant further contribution to meeting housing requirements. The Masterplan Strategy for Hermiston Park, in its current form, has been developed over the past two years or so in discussion with the Council and relevant stakeholders, including Heriot Watt University. This emerged from previous significant analysis and consultation in respect of the wider Garden District Proposals, of which Hermiston Park still forms a part. Most recently, the Hermiston Park proposals have been presented to the team preparing the 'West Edinburgh Spatial Strategy for Inclusive Growth', and submitted for their consideration in taking forward the next phase of that study. The key elements of the Hermiston Park Masterplan Strategy can be summarised as follows:

- Deliver over 4,000 new homes at an average density of 65 dwellings per hectare.
- Deliver more than 1,000 affordable homes.
- Put new homes next to jobs.
- Deliver new, sustainable, transport connections that capitalise on the existing infrastructure with the potential to support the extension of the tram to the West of Hermiston.
- Connect the City to the University.
- Connect the existing neighbourhoods, including Wester Hailes, to the economic and social opportunities on the City's western edge.
- Provide mixed use amenity in terms of employment, community, health and sports facilities.
- Create new schools with the opportunity for synergies with the University.
- Deliver opportunities for complementary development to Heriot Watt's Research Park to stimulate Economic Potential.
- Create a vibrant, mixed use, place that will enhance the western edge of the city with low level impact on existing communities. Share the benefits of making a better, more attractive, place to facilitate Inclusive Growth.

The allocation of this site for housing would create a new urban extension to Edinburgh, linking the communities of west Edinburgh across the bypass to Heriot Watt University. Development of this site gives the Council an opportunity to increase the catchment area of Wester Hailes Education Centre which would increase the school roll considerably, improve learning opportunities and curriculum choice. Public transport is to be provided through the site and the development can facilitate a public transport hub, including a tram/bus interchange if feasible. Connections through the site will focus on sustainable transport modes and connections to neighbouring developments and employment uses. Vehicular routes through the site will have bus priority measures and active travel routes. The possibility of a new and important active travel route, by way of a 'Green Bridge', over the City Bypass is supported in principle by Murray Estates, and their initial assessment concludes that it is feasible in terms of land ownership and technical requirements. There is also linkage via Westburn Avenue in the South East corner of the site back to Wester Hailes, and the existing bus services to Baberton (33) could be extended. The Hermiston Park area is within a

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single ownership and delivery of the site for development is fully in the control of Murray Estates. This will ensure that there are no delays to delivering development in the short-term arising from land assembly issues. Murray Estates have undertaken significant advance work to establish a multi-utility delivery strategy. There have been detailed discussions with Scottish Water and Scottish Water Horizons establishing that water supply and drainage infrastructure will be available to serve the development in the short-term by accessing the new A8 rising sewage main to Newbridge Waste Water Treatment Plant and the Marchbank Water main. There have also been negotiations with Scottish Energy Power Networks to address the prospect of removing the pylons and undergrounding the transmission cables that traverse the site. A Flood Risk Assessment for the area has been undertaken, which confirms the extent of the Murray Burn flood plain, and has provided the basis for the Masterplan to locate development and green open space to avoid any flood risk. In order to assist the Council, we have asked our expert consultants to review the relevant Site Assessments contained within the City Choices Housing Study. Relevant to the Hermiston Park Masterplan are the 'East of Riccarton' and 'South of M8, Assessment areas. For clarity, these areas are shown in the plan submitted in response to Q12C. Of particular note is the fact, that despite the Council's East of Riccarton site assessment concluding that the area is suitable for development, the decision appears to have been taken that some land within the EoR area, between the A71 and the M8 should not form part of the potential development allocation. No explanation is given for this approach. In our view there is no good reason for excluding this parcel of land. Quite the contrary, as it is very well suited to accommodating sustainable development for the following reasons:

- Close proximity to the Hermiston Park & Ride, Edinburgh Park and the Gyle Shopping Centre.
- There are no environmental sensitivities so long as development is appropriately buffered from road noise on the M8.
- There are opportunities to create attractive focal points on these key gateways into Edinburgh.
- The environment of the A71 may benefit in this location by being transformed into a 'city street', with frontage development on both sides.
- Additional development will add to the overall viability of the project and increase the number of houses that can be delivered to meet requirements. Part of the Hermiston Masterplan area, west of Gogar Station Road and east of Hermiston House Road, to the south of the M8, is within the eastern part of the 'South of M8' Assessment Area. The Council's assessment of the South of M8 area concludes that it is not suitable for development for the following reasons, and we provide comments (in capitals) on each in respect to the parcel of land between Gogar Station Road and Hermiston House Road:

- Poor transport connectivity
COMMENT: THIS MAY BE TRUE FOR THE FAR WESTERN PART OF THE ASSESSMENT AREA, BUT THE PARCEL OF LAND WITHIN THE HERMISTON PARK MASTERPLAN HAS VERY GOOD CONNECTIVITY, BEING IMMEDIATELY ADJACENT TO THE HERMISTON PARK & RIDE, AND OF COURSE WITH IMMEDIATE ACCESS TO THE A71. THIS AREA IS ALSO SERVED BY THE SEGREGATED CYCLE ROUTES ON GOGAR STATION ROAD LINKING TO THE CORE PATH AND CYCLE ROUTE AND LINK UNDER THE CITY BYPASS TO EDINBURGH PARK. THERE IS ALSO DIRECT ACCESS TO THE UNION CANAL WHICH SERVES THE NATIONAL CYCLE ROUTE 754.
- Lack of education capacity
THE SITE HAS THE SAME PROSPECTS FOR THE AVAILABILITY OF FUTURE EDUCATION CAPACITY AS THE EAST OF RICcarton ASSESSMENT AREA, WHICH IS SUPPORTED FOR DEVELOPMENT IN THIS RESPECT.
- Landscape character associated with the Union Canal
THIS IS RELEVANT TO THE NORTHERN PART OF THE PARCEL OF LAND, BUT IS NOT NECESSARILY A CONSTRAINT TO DEVELOPMENT. IT CAN EITHER BE DEALT WITH BY RESERVING AN APPROPRIATE UNDEVELOPED BUFFER OR BY CREATING AN ACTIVE DEVELOPED FRONTAGE WHICH INCORPORATES THE CANAL INTO PART OF THE URBAN AREA. THIS LATTER APPROACH IS OBVIOUSLY VERY SUCCESSFULLY ACHIEVED WITHIN THE CURRENT URBAN AREA, INCLUDING RECENT DEVELOPMENTS (E.G. CALA HOMES IN RATHO). THIS, IN OUR VIEW, IS A MATTER FOR DETAILED CONSIDERATION WITH THE COUNCIL IN TAKING FORWARD THE HERMISTON MASTERPLAN. Moreover, there appears to us a compelling argument that the parcel of land east of Hermiston House Road should have been included within East of Riccarton Assessment Area, with which it shares far more characteristics. We have also reviewed in detail the site assessment for the East of Riccarton area, and trust that the comments below will be taken into account in the further consideration of the site's allocation in the LDP. We would also like to highlight the possibility of identifying space in CityPlan 2030 for "green" uses such as cemetery space and allotments on land beyond the Hermiston

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Park site, within the 'North of M8' and 'South of M8' Assessment Areas, which is controlled by Murray Estates. We would welcome further discussion with the Council on the possibilities that might exist. COMMENTS ON EAST OF RICCARTON SITE ASSESSMENT Does the site fit within an area identified as a strategic development area?No – The site is not within an identified SDACOMMENT: THIS IS CORRECT BUT SESPLAN 1 POLICY 7 DOES SUPPORT THE ALLOCATION OF SITES IN THE LDP WHICH ARE OUTWITH AN SDA ON THE FOLLOWING CONDITIONS:A. THE DEVELOPMENT WILL BE IN KEEPING WITH THE CHARACTER OF THESETTLEMENT AND LOCAL AREA;B. THE DEVELOPMENT WILL NOT UNDERMINE GREEN BELT OBJECTIVES; ANDC. ANY ADDITIONAL INFRASTRUCTURE REQUIRED AS A RESULT OF THEDEVELOPMENT IS EITHER COMMITTED OR TO BE FUNDED BY THE DEVELOPER AS EXPLAINED IN COMMENTS BELOW, ALL OF THESE CONDITIONS CAN BE MET. Does the site support travel by foot to identified convenience services?Partially – The site is not within walking distance to local convenience services. Convenience services can be provided on the site due to scope for development hereCOMMENT: AGREED – SEE MASTERPLAN STRATEGY SUBMITTED IN RESPONSE TO Q12C. ALSO THE NORTHERN AND EASTERN AREAS OF THE SITE ARE IN CLOSER PROXIMITY TO THE SHOPS AT HERMISTON GAIT AND WESTSIDE PLAZA ACCESS WHICH WOULD BE ENHANCED BY ANY POTENTIAL GREEN BRIDGE Does the site support travel by foot to identified employment clusters?Partially – The site is within walking distance of employment clusters but access is impeded by the poor walking environment along Riccarton Mains Road, which form a barrier to the Riccarton employment clusterCOMMENT: AS PART OF THE MASTERPLAN THE NEED FOR IMPROVED DIRECT AND SAFE CROSSINGS OF RICCARTON MAINS ROAD WILL BE CONSIDERED AND ONE EARLY GAIN COULD BE THE REPLACEMENT OF THE EXISTING ROUNDABOUT WITH TRAFFIC SIGNALS AND CONTROLLED PEDESTRIAN CROSSINGS GIVING IMPROVED ACCESS TO HERIOT WATT AND THE RESEARCH PARK. CONSIDERATION WOULD ALSO BE GIVEN TO IMPROVING THE WALKING ROUTE TO HERMISTON GAIT AND ONWARDS TO EDINBURGH PARK. Does the site have access to the wider cycle network?No – The site does have access to the wider cycle network but access is impeded by the Union Canal cycle path which is considered at capacity. Access is unlikely to be improved as capacity cannot be improved here and no other suitable potential cycle route interventions have been identified which could serve the site. A new bridge would be required over the City of Edinburgh Bypass to connect to the West Edinburgh Link cycle intervention.COMMENT: THE SITE IS LOCATED IN CLOSE PROXIMITY TO THE NCR 754 WHICH FOLLOWS THE UNION CANAL TO THE NORTH AND ALSO THE NCR 76 TO THE SOUTH WHICH FOLLOWS THE WATER OF LEITH. THERE ARE ALSO A NUMBER OF LOCAL CYCLE ROUTES IN CLOSE PROXIMITY ON GOGAR STATION ROAD LINKING TO EDINBURGH PARK AND THE AIRPORT TO THE NORTH AND CURRIE TO THE SOUTH. THE POTENTIAL GREEN BRIDGE WOULD REMOVE THE BARRIER CREATED BY THE CITY BYPASS FOR CYCLING AND WALKING. Can the site support active travel overall through appropriate intervention?No – The site would not support active travel overall, as the site is not within walking distance of local convenience services and these are unlikely to be provided through development due to lack of scope for development nearby. Access to the wider cycle network is poor and would require a bridge connection to the West Edinburgh Link cycle intervention to improve this, which is not committed.COMMENT: THE SITE IS VERY WELL LOCATED TO SUPPORT ACTIVE TRAVEL GIVEN ITS PROXIMITY TO THE NATIONAL CYCLE ROUTE NETWORK AND THE LOCAL PATHS SERVING EDINBURGH PARK AND THE AIRPORT TO THE NORTH AND CURRIE TO THE SOUTH. THE SITE COULD SUPPORT THE DELIVERY OF A GREEN BRIDGE FOR ACTIVE TRAVEL MODES ACROSS THE CITY BYPASS. THE CLOSE PROXIMITY OF THE SITE TO HERIOT WATT, THE RESEARCH PARK AND EDINBURGH PARK WOULD SUPPORT SHORTER WALKING AND CYCLING TRIPS. DEVELOPMENT OF THE SITE WOULD INCLUDE LOCAL AMENITIES SUCH AS SHOPS AND COMMUNITY FACILITIES WITH THE STREET NETWORK DESIGNED TO PRIORITISE WALKING AND CYCLING. Does the site support travel by public transport through existing public transport network accessibility and capacity?No – The site does not support travel by public transport based on existing or incrementally improved provision.COMMENT: THE SITE IS LOCATED ADJACENT TO THE HERMISTON PARK AND RIDE AND THE HIGH FREQUENCY BUS CORRIDOR ON THE A71. THERE IS SCOPE TO ENHANCE PROVISION OVER TIME BY CREATING BUS ROUTES THROUGH THE SITE LINKING WITH THE EXISTING SERVICES SERVING WESTER HAILES AND JUNIPER GREEN THROUGH NEW BUS PRIORITY LINKS. THE DRAFT CITY MOBILITY PLAN IDENTIFIES NEW CORRIDORS

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FOR STRATEGIC PUBLIC TRANSPORT INTERVENTIONS WHICH COULD BE THE EXTENSION OF THE TRAM. CORRIDOR 8 IS SPECIFICALLY IDENTIFIED IN CHOICES FOR CITY PLAN 2030 WITH POTENTIAL FOR EXTENDING THE TRAM TO THE WEST OF HERMISTON. THE SITE PROVIDES AN OPPORTUNITY FOR PROVIDING A SEGREGATED ROUTE FOR THIS TRAM EXTENSION AND THE CREATION OF A NEW PUBLIC TRANSPORT HUB WITH THE HERMISTON PARK & RIDE. THERE IS ALSO SCOPE TO IMPROVE WALKING AND CYCLING LINKS TO NEARBY RAILWAY STATIONS AT EDINBURGH PARK, WESTERHAILES AND CURRIEHILL. Is the site potentially served by an identified public transport intervention project which is deliverable in the plan period to serve and accommodate development?No – The site may support travel by public transport based on an identified intervention, but this intervention is not deliverable within the plan period.COMMENT – IT IS NOT CLEAR WHY THE CORRIDOR 7 WEST ALONG THE A8 AND CORRIDOR 8 WEST OF HERMISTON COULD NOT BE DELIVERED WITHIN THE PLAN PERIOD TO 2030. FURTHER WORK WOULD BE REQUIRED TO LOOK AT THE FEASIBILITY OF THESE 2 CORRIDORS AS TRAM EXTENSIONS AND SOME OTHER FORM OF RAPID TRANSIT LIKE BUS. THERE IS ALSO THE POSSIBILITY OF LINKAGE VIA WESTBURN AVENUE IN THE SOUTH EAST CORNER OF THE SITE BACK TO WESTER HAILES AND THE EXISTING BUS SERVICES TO BABERTON (33) CAN BE EXTENDED. Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?No – The site does not have sufficient primary school infrastructure capacity.COMMENT: SEE COMMENT BELOW Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?No – The site does not have sufficient secondary school infrastructure capacity.COMMENT: SEE COMMENT BELOW If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?Partially – The site does not have sufficient community infrastructure capacity to support development and no appropriate existing intervention has been identified to address this. A new primary school would be required. The site is in a location that means that catchment change could be considered as a way of mitigating the impact of the development. If the site became part of the WHEC catchment area it could benefit from additional capacity provided by the redevelopment of the school.COMMENT: MURRAY ESTATES WELCOME CONTINUED DISCUSSIONS WITH THE COUNCIL ON A DELIVERABLE EDUCATION STRATEGY, INCLUDING THE POSSIBILITY OF EXTENDING THE WHEC CATCHMENT TO INCLUDE HERMISTON PARK. Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?Yes – Scope for development on this site is identified due to the lack of scenic views across the site, lack of contribution to the setting of the city and less rural character compared to other landscapes, and the settlement pattern of Currie already being disrupted by development at Baberton. Although it is beyond the robust settlement boundary formed by the City of Edinburgh Bypass, opportunities to create new boundaries exist to the west and south. Overhead power lines form a constraint to development here.COMMENT: AGREED. MURRAY ESTATES ARE IN DISCUSSIONS WITH SCOTTISH POWER ENERGY NETWORKS IN REGARD TO UNDERGROUNDING THE POWER LINES. Would development of the site avoid significant loss of landscape-scale land identified as being of existing or potential value for the strategic green network?Partially – The site may be considered of value for the strategic green network, due to lying within an area identified as a green network opportunity adjacent to the City of Edinburgh Bypass and the Union Canal. There is opportunity to incorporate land around the Murray Burn, identified as an area of medium-high flood risk, into a part of the strategic green network for the west of the city following the burn from the City of Edinburgh Bypass to Ravelrig Road, north of Balerno. The Union Canal is considered part of the strategic green network and its surroundings should be enhanced alongside any development proposal adjacent to it. Connections should be considered between these elements as well as the adjacent identified strategic green network component formed by Baberton Golf Club.COMMENT: AGREED Would development of the site avoid identified areas of ‘medium-high flood risk’ (fluvial) or areas of importance for flood management?Partially – Part of the site is covered by an area of medium-high flood risk and area of importance for flood management, although this does not cover a substantial area of the overall site. The site can still be developed while avoiding these areas to mitigate major flood risk, and opportunity exists to incorporate this within development as part of the strategic green network.COMMENT: AGREED. THE HERMISTON PARK MASTERPLAN SHOWS THE

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

MURRAY BURN FLOOD RISK AREA AS OPEN SPACE WHICH WILL FORM PART OF THE STRATEGIC GREEN NETWORK. Is the site suitable for development? Yes - The site is considered suitable for development, despite not being within the SESplan Strategic Development Areas as set out in its spatial strategy, and poor accessibility in the short/medium term. The site should be considered as an urban extension between the City of Edinburgh Bypass and Riccarton. Any development should have regard to areas of flood risk, potential blue/green infrastructure, the improvement of Riccarton Mains Road for active travel and public transport users and improving access across the Bypass to the existing urban area. Although public transport access remains relatively poor in the short-term and major intervention is only expected post-plan, the site is located adjacent to the Hermiston Park and Ride site and some high frequency bus services serve the area. As the site is not within the SESplan spatial strategy it should be considered as a reasonable alternative to other sites with the Strategic Development Areas. Development of the site will result in a new settlement boundary beyond the Bypass formed by the railway line, Riccarton and Calder Road/Hermiston and opportunities to enhance screening by tree planting in relevant areas should be considered, particularly where the site faces the Bypass although there may also be scope for non-housing land-uses to act as a buffer to the Bypass. Accessibility improvements are required to enable development, and a new crossing over the Bypass to Wester Hailes would be required as well as improvements to Riccarton Mains Road and Calder Road to improve walking and public transport. The masterplan for the site should have regard to a potential long-term major public transport intervention to serve the wider area. A strategy for moving or undergrounding the overhead power lines should be investigated to improve the development potential in this area, if not appropriate uses should be found for the land below these lines. As part of the development of a wider strategic green network, connections should be made to the area of medium-high flood risk within the site, associated with the Murray Burn, which is identified as a potential landscape-scale component of the network. The level of development proposed here and in adjacent sites would require three new non-denominational primary schools, one Roman Catholic primary school and one new non-denominational secondary school. There would be a partial requirement for a new Roman Catholic secondary school to address growth here and citywide. These requirements should be co-ordinated through a brief for this site. COMMENT: WE DO NOT AGREE WITH THE CONCLUSION THAT BECAUSE THE SITE IS NOT WITHIN THE SESPLAN 1 STRATEGIC DEVELOPMENT AREA IT SHOULD BE CONSIDERED AS A REASONABLE ALTERNATIVE TO THOSE SITES THAT ARE. THIS WAS NOT THE APPROACH TAKEN IN LDP1, WHICH ALLOCATED A NUMBER OF SITES OUTWITH THE SDA IN PREFERENCE TO SITES WITHIN THE SDA. EACH SITE SHOULD BE CONSIDERED ON ITS INDIVIDUAL MERITS REGARDING THE CRITERIA IDENTIFIED IN SESPLAN POLICY 7, WHICH DOES NOT DISTINGUISH BETWEEN SITES WITHIN OR OUTWITH THE SDA IN TERMS OF ALLOCATION. IN ADDITION WE NOTE THAT THE SITE IS WITHIN THE WEST EDINBURGH AREA OF SEARCH WHERE THE COUNCIL CONSIDERS THAT THERE IS POTENTIAL FOR DEVELOPMENT IN THE CONTEXT OF TRANSPORT AND CITY DEAL FUNDING. THIS ADDS TO THE ARGUMENT THAT THE SITE SHOULD NOT BE CONSIDERED AS A 'REASONABLE ALTERNATIVE' TO SDA SITES. WE ALSO DISAGREE, FOR THE REASONS GIVEN ABOVE AND EXPLAINED IN THE HERMISTON PARK MASTERPLAN, WITH THE IMPLIED CONCLUSION THAT NECESSARY TRANSPORT INTERVENTIONS ARE ONLY LIKELY BEYOND THE PLAN PERIOD. IN OUR VIEW THE SITE HAS EXCELLENT POTENTIAL FOR EXCELLENT PUBLIC TRANSPORT IN THE SHORT-TERM, ABOVE AND BEYOND WHAT ALREADY EXISTS.

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 12 C

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

Short Response

Explanation

Choice 12 C

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

Short Response

Explanation

Choice 12 C

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

Short Response

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **12 D**

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

Short Response

Explanation

Choice **13 A**

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

Short Response

Explanation

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 We agree that the LDP should take account of the West Edinburgh Study. Murray Estates participated in Phase 1 of the West Edinburgh Strategy for Inclusive Growth, providing information by way of interview and submitting the Hermiston Masterplan for consideration. Murray Estates look forward to contributing to the next Phase of the study. As we have explained in answer to Q12B, there is additional land immediately to the north of East of Riccarton that could be allocated in order to provide the more comprehensive proposals contained in the Hermiston Masterplan.

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

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

Supporting Info
Email

Choice 14 C

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

Short Response

Explanation

Choice 15 A

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

Short Response

Explanation

Choice 15 B

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

Short Response

Explanation

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

Supporting Info
Email

Choice 15 C

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

Short Response

Explanation

Choice 15 D

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

Short Response

Explanation

Choice 15 E

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **15 G**

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

Short Response

Explanation

Choice **16 A1**

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

Short Response

Explanation

Choice **16 A2**

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

Short Response

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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:

Supporting Info

Name

Email

Response Type

On behalf of:

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:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 16 E4

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

Short Response

Explanation

Choice 16 E5

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

Short Response

Explanation

Choice 16 E6

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

Short Response

Explanation

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

Supporting Info

Email

Choice 16 E7

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

Short Response

Explanation

Choice 16 E8

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

Short Response

Explanation

Choice 16 EX

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

Short Response

Explanation

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

Supporting Info
Email

Choice 16 F

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

Short Response

Explanation

Choice 16 G

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

Short Response

Explanation

Choice 16 H

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

Short Response

Explanation

Customer Ref: **Response Ref:**

Name

Response Type

On behalf of:

Supporting Info

Email

MURRAY
ESTATES

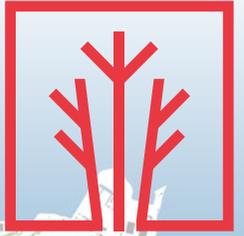


EDINBURGH'S
GARDEN DISTRICT

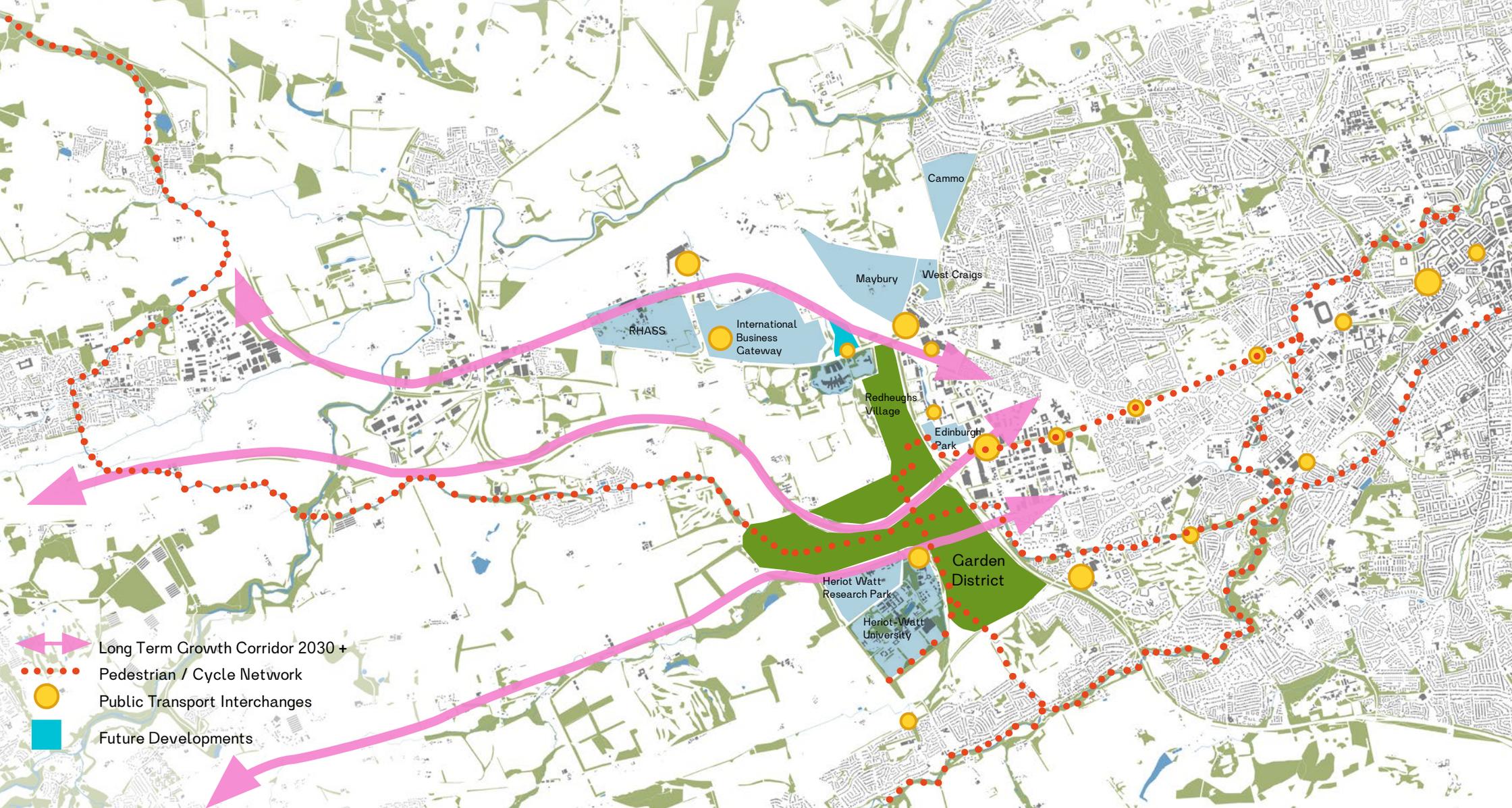
7N Architects
Masterplan Strategy
Hermiston Park

Edinburgh's Garden District
April 2020

A Pivotal Site In West Edinburgh's Growth

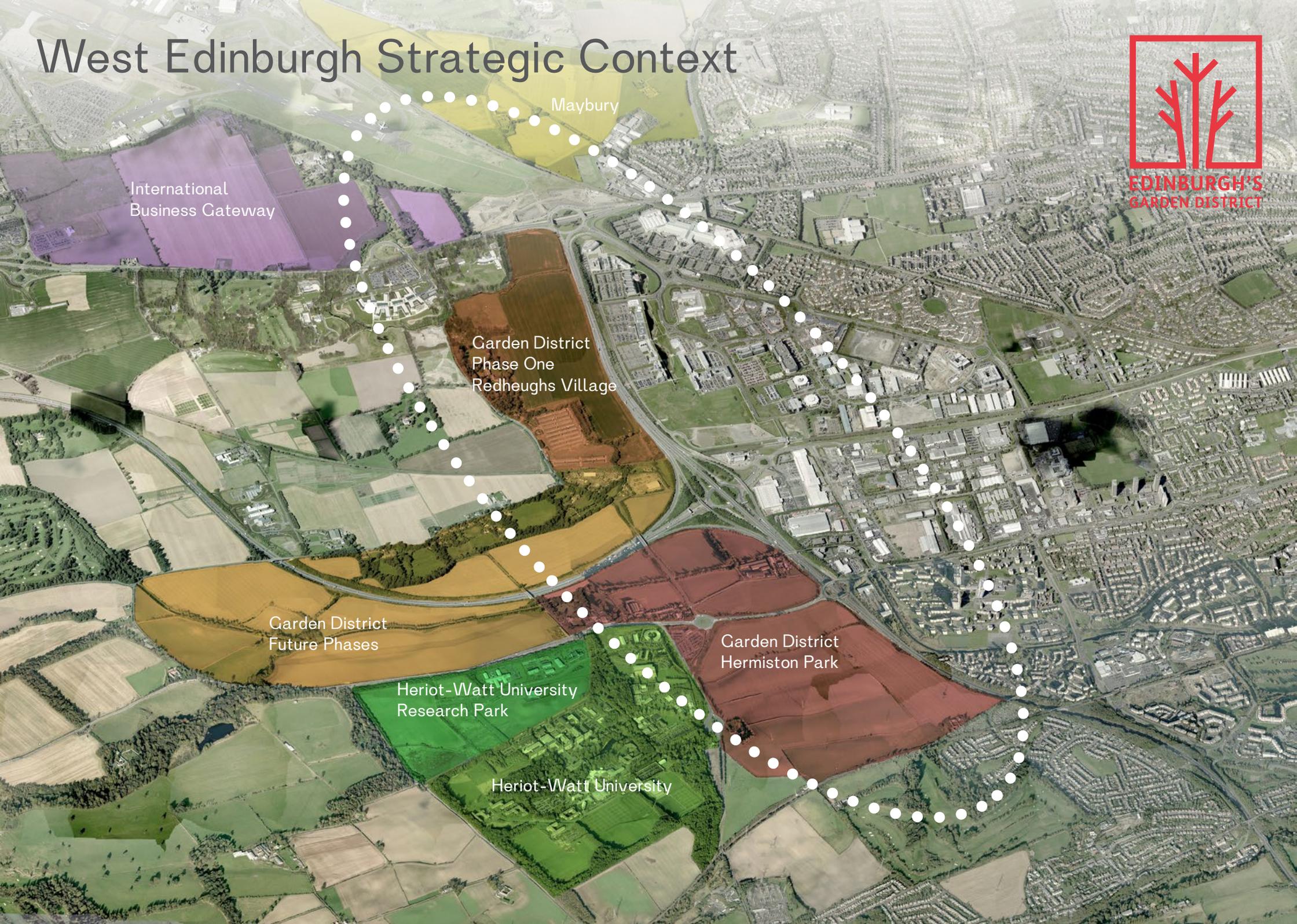


EDINBURGH'S
GARDEN DISTRICT



-  Long Term Growth Corridor 2030 +
-  Pedestrian / Cycle Network
-  Public Transport Interchanges
-  Future Developments

West Edinburgh Strategic Context



International
Business Gateway

Maybury

Garden District
Phase One
Redheughs Village

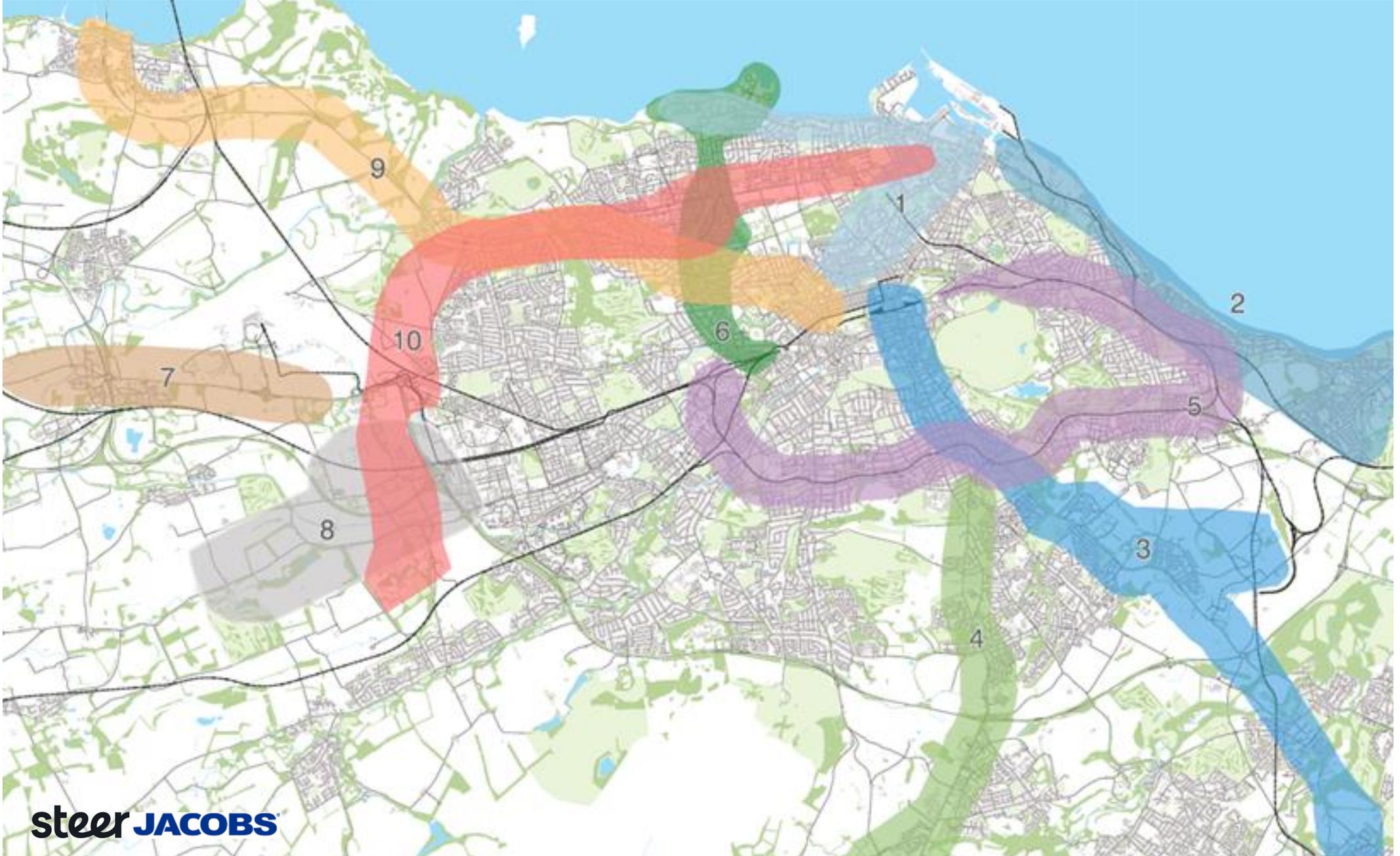
Garden District
Future Phases

Heriot-Watt University
Research Park

Heriot-Watt University

Garden District
Hermiston Park

Draft City Mobility Plan - Strategic Corridors



Over 4,000 homes including more than
1,000 affordable homes

Education/Schools/Community Facilities

Inclusive growth . . . connected to the city

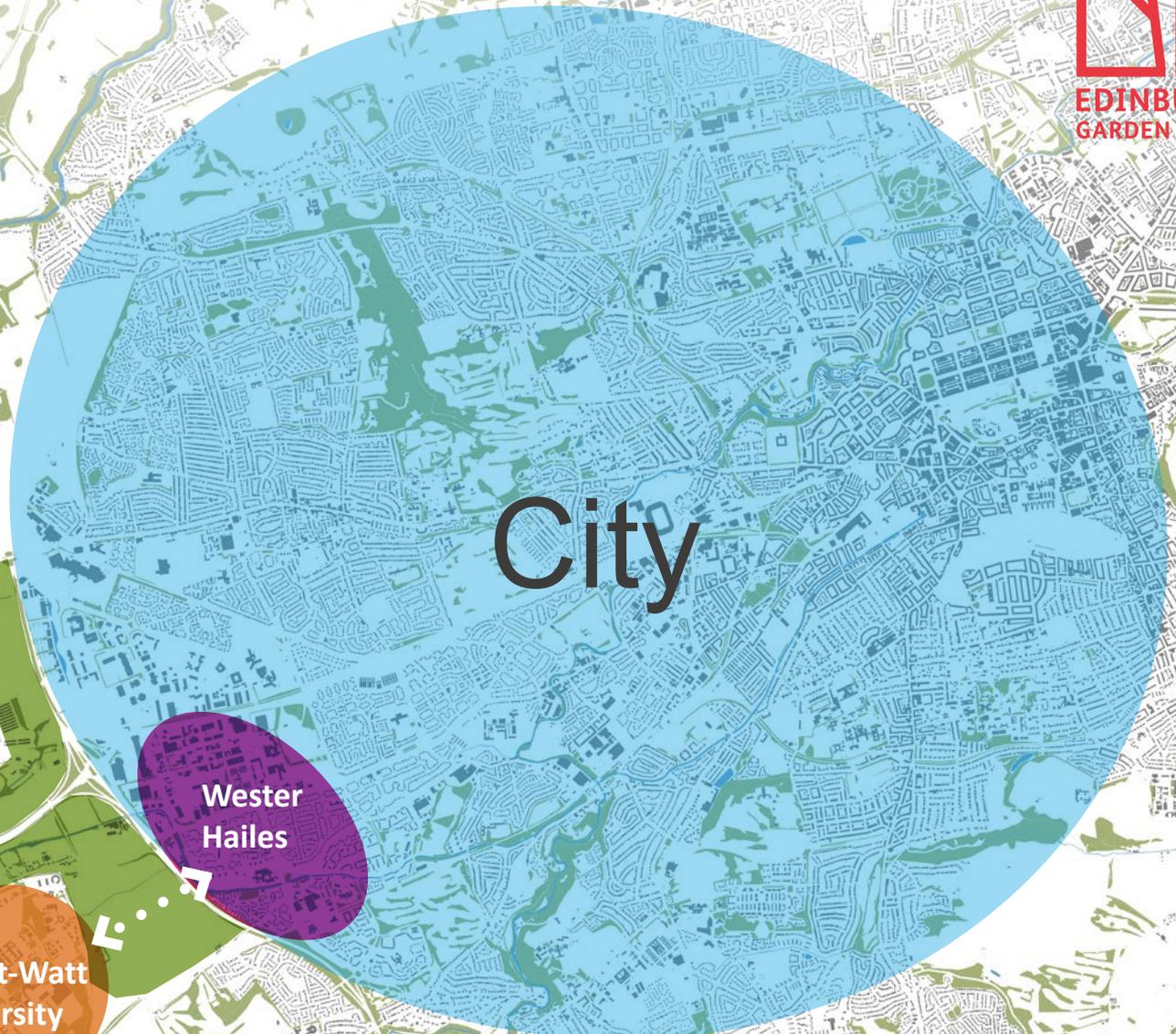




EDINBURGH'S
GARDEN DISTRICT

The Vision for Hermiston Park is to create a new, integrated, district and neighbourhood which will weave together Heriot-Watt University to the west with existing communities to the east.

New Connections to Drive Inclusive Growth



City

Wester Hailes

Heriot-Watt University

Disconnected Edge



Edinburgh Park

Edinburgh
College Sighthill
Campus

Sighthill Industrial
Estate

Edinburgh Napier
University
Sighthill Campus

Wester Hailes /
Sighthill

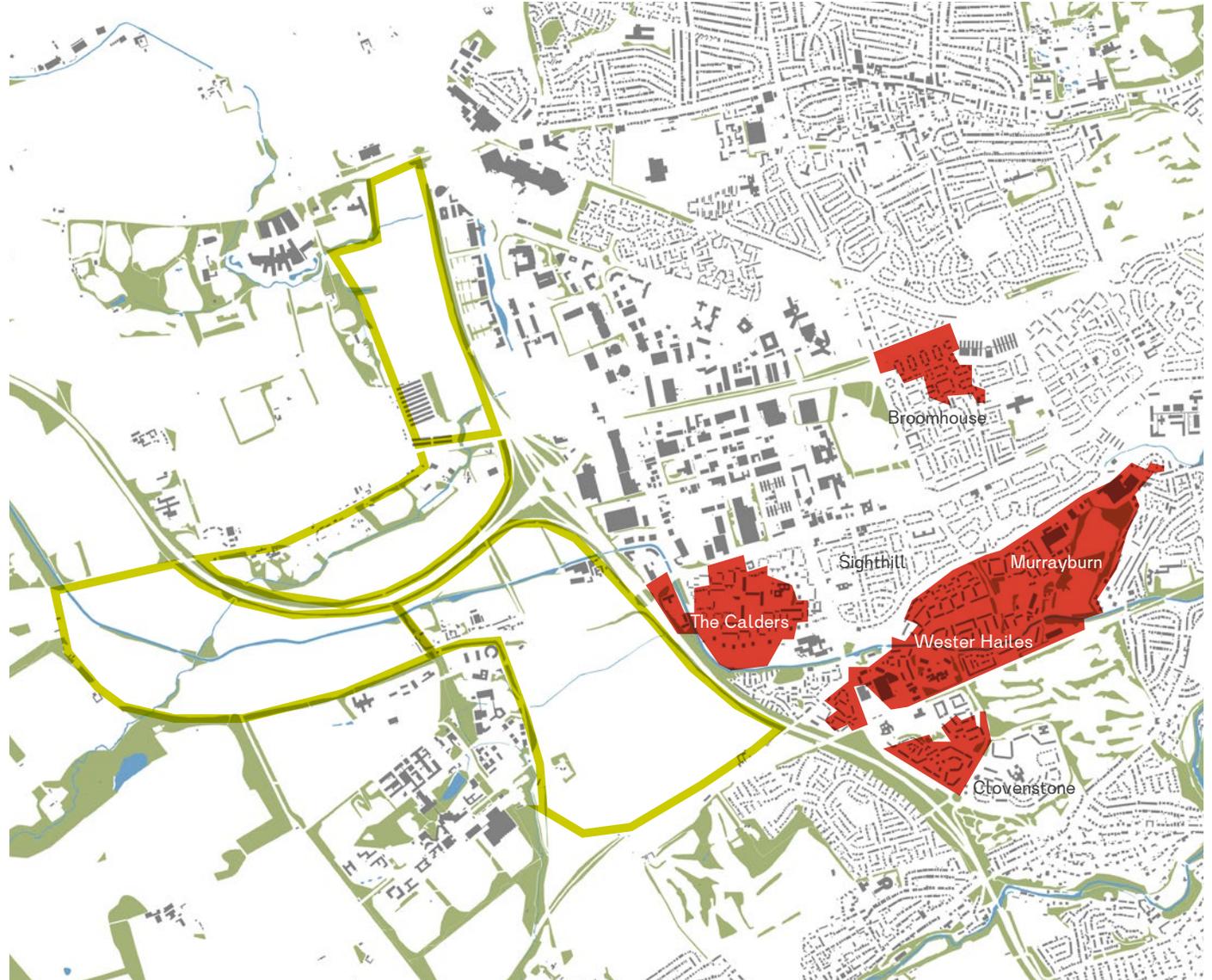
Heriot-Watt
University

Baberton

Social Context



No other development proposal in Edinburgh provides so many opportunities to change so many people's lives for the better, through the creation of new communities and an improved way of living.



Strategy



Electric Bus Connecting Loop
via Edinburgh Park

Redheughs
Village

Edinburgh Napier
University Sighthill
Campus

Industrial Estate

Connecting Loop via
Redheughs Village

Residential

Existing
Neighbourhoods

Residential

Residential

Transport
Hub

Residential
Mixed Use

Existing
Neighbourhoods

Wester
Hailes
Station

Research Park

Centre

Residential
Mixed use

Residential

Heriot-Watt University

Residential

Existing
Neighbourhoods

Masterplan



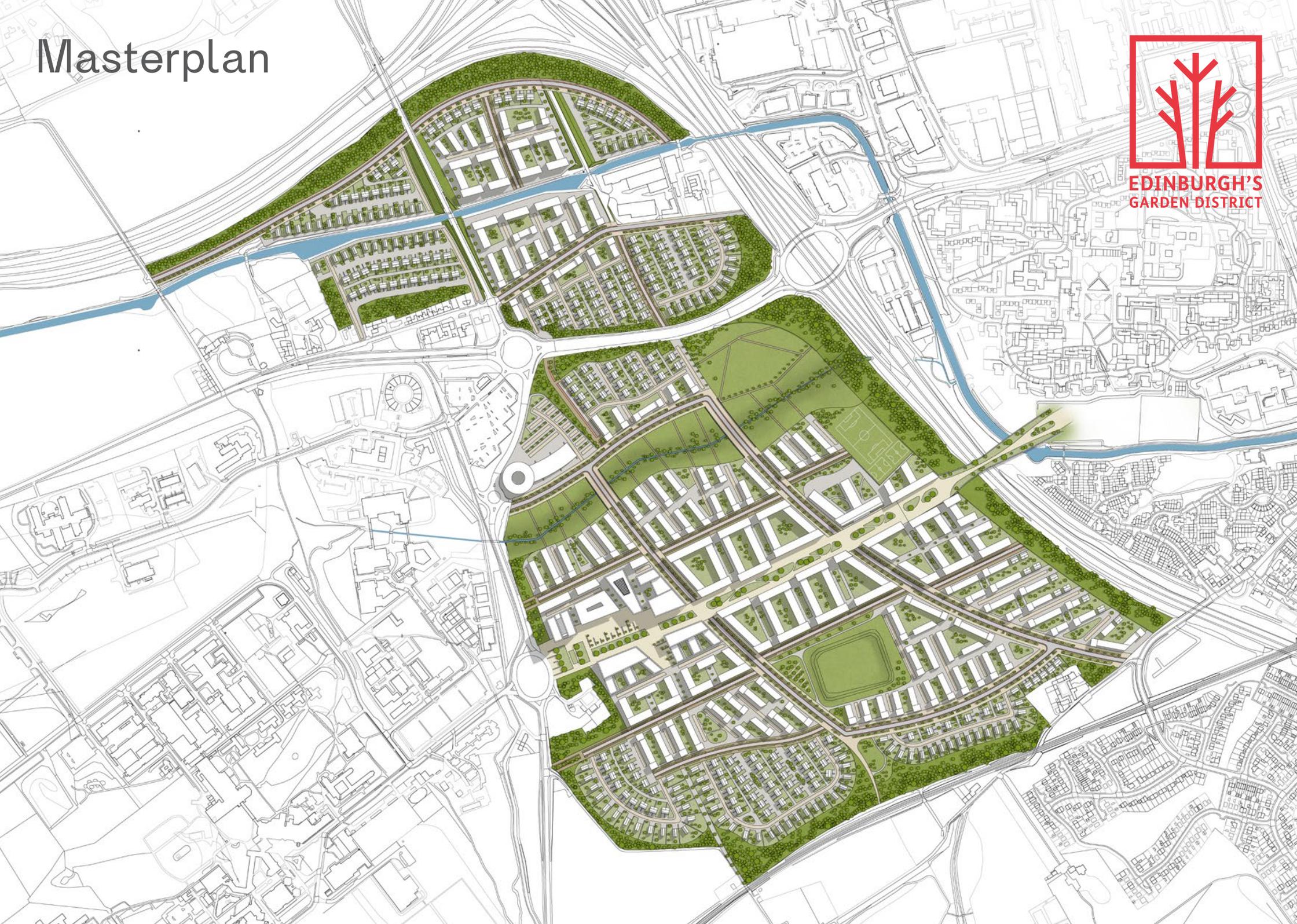
**EDINBURGH'S
GARDEN DISTRICT**



Masterplan



EDINBURGH'S
GARDEN DISTRICT



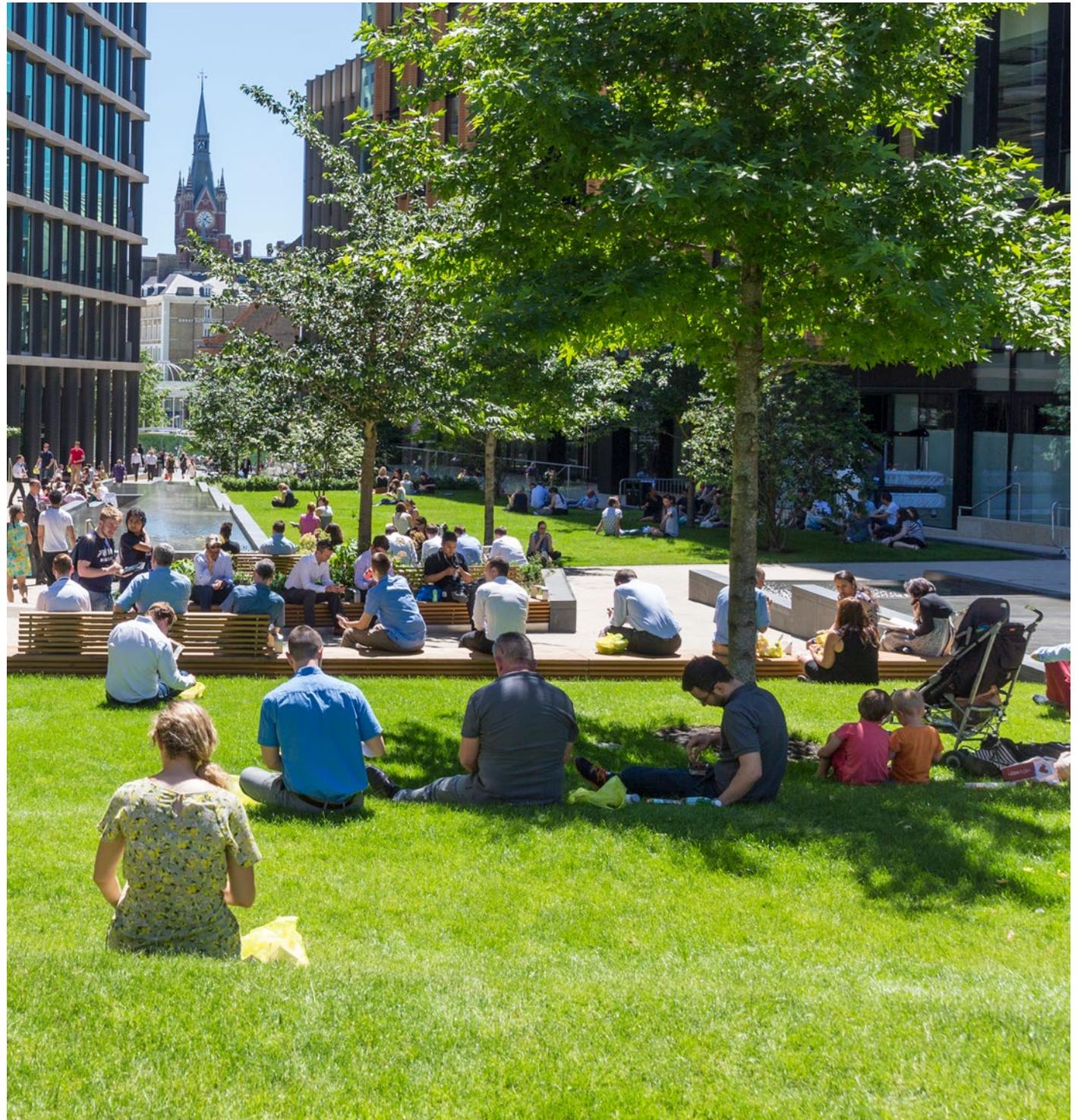
Mixed Use People Places

Successful places are generally characterised as being people places, places which are animated by pedestrians and cyclists rather than being dominated by vehicles.



Green Space

Hermiston Park will be characterised by green space which will be integrated with the green campus of Heriot-Watt University and will provide open green amenity space for the new and existing communities.



Housing

- High density
- Multi-family housing
- Mixed tenure
- Affordable housing
- Green setting
- Making a major contribution to the city's housing need.



Accordia, Cambridge

Benchmark: North West Cambridge

- 1500 affordable homes for University and College staff
- 1,500 houses for sale
- Accommodation for 2,000 post-graduates
- 1,000,000 sq.ft of academic and research and development space
- Primary school
- Community centre
- Health centre
- Care home
- Sports centre
- Supermarket
- Local shops
- Hotel
- Sustainable transport



The Site



Masterplan Extents

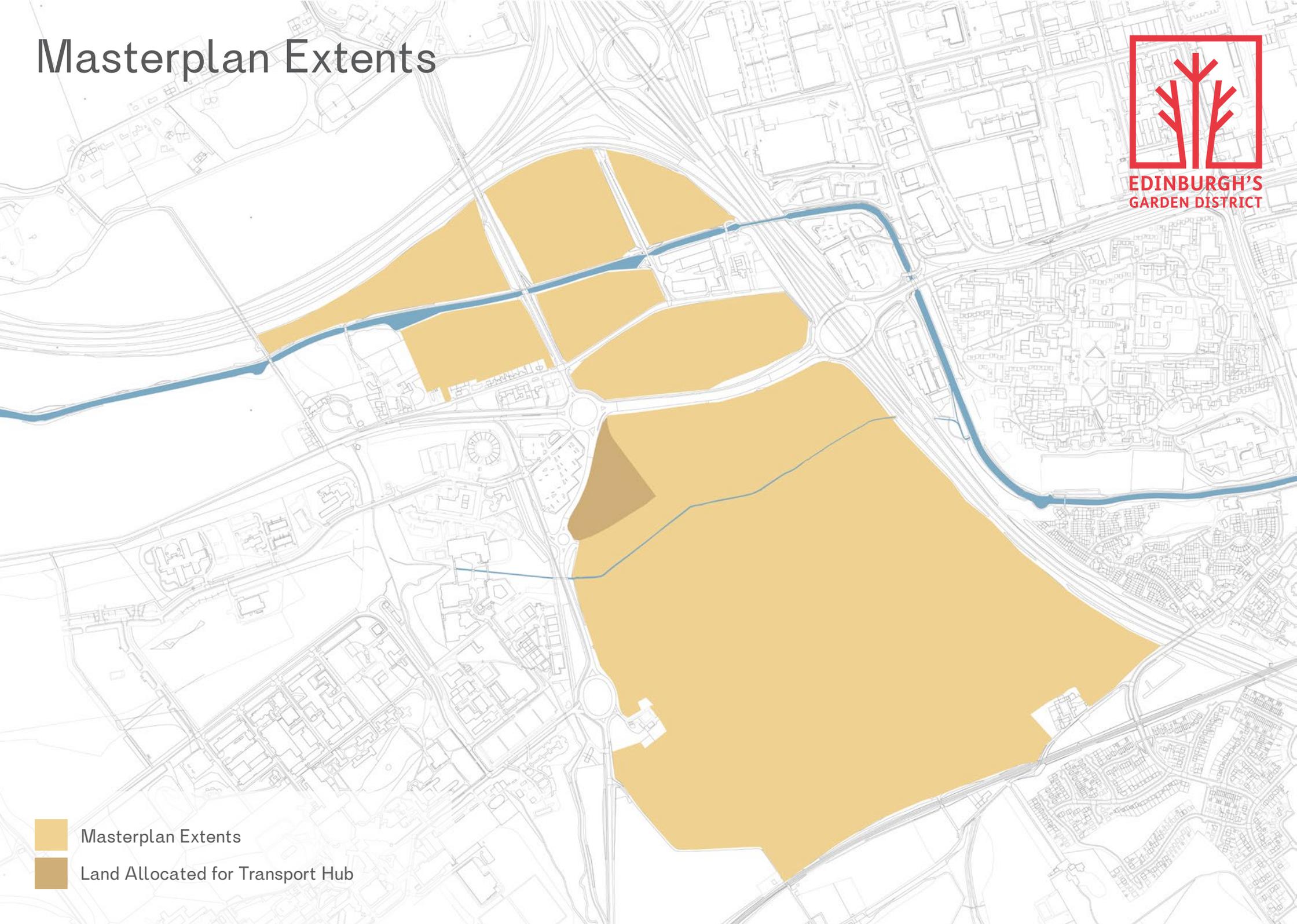


EDINBURGH'S
GARDEN DISTRICT



Masterplan Extents

Land Allocated for Transport Hub

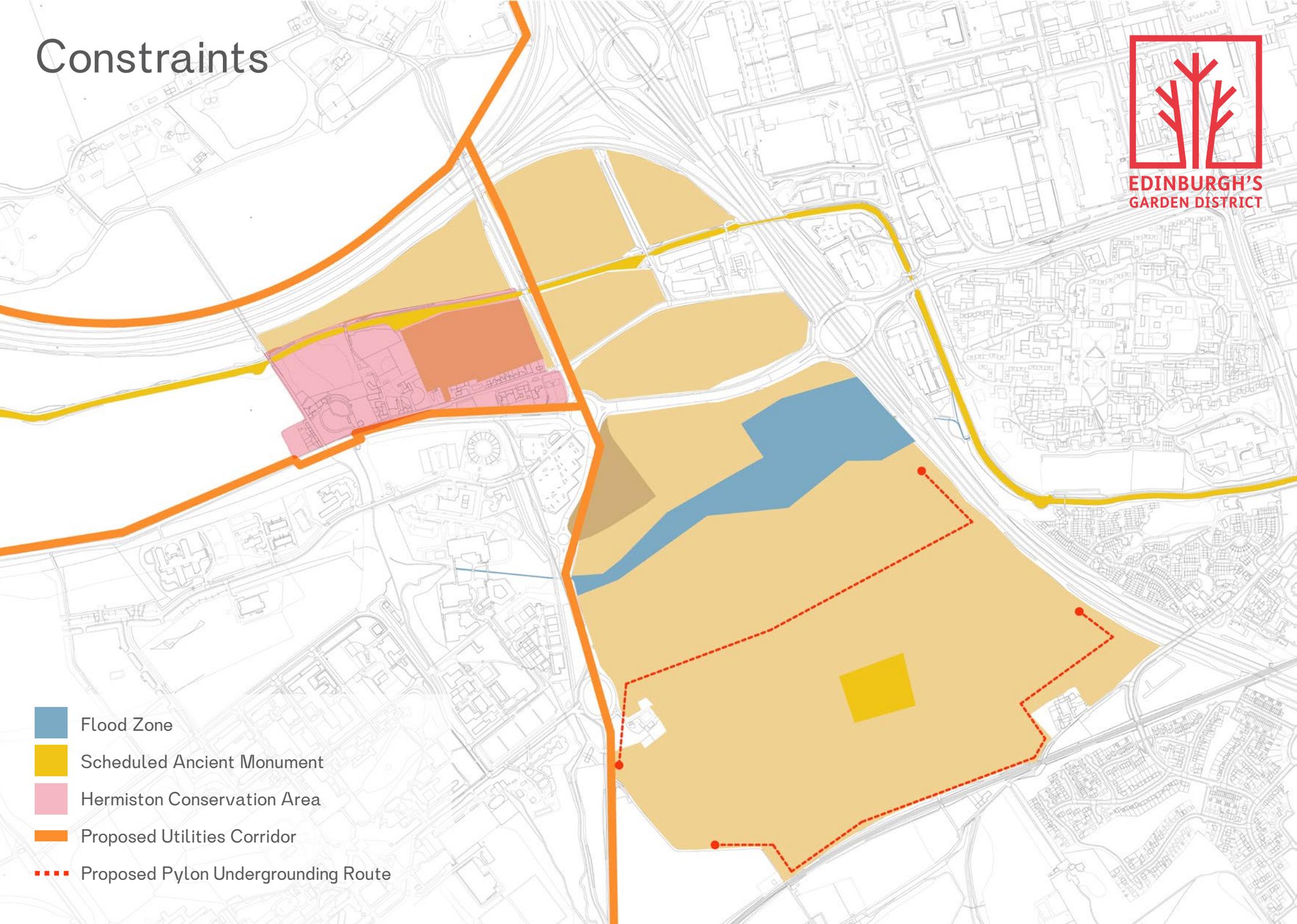


Constraints



EDINBURGH'S
GARDEN DISTRICT

-  Flood Zone
-  Scheduled Ancient Monument
-  Hermiston Conservation Area
-  Proposed Utilities Corridor
-  Proposed Pylon Undergrounding Route



Developable Area



EDINBURGH'S
GARDEN DISTRICT

-  Developable Area
-  Transport Hub
-  Green Buffer
-  Parkland



Key Connecting Links

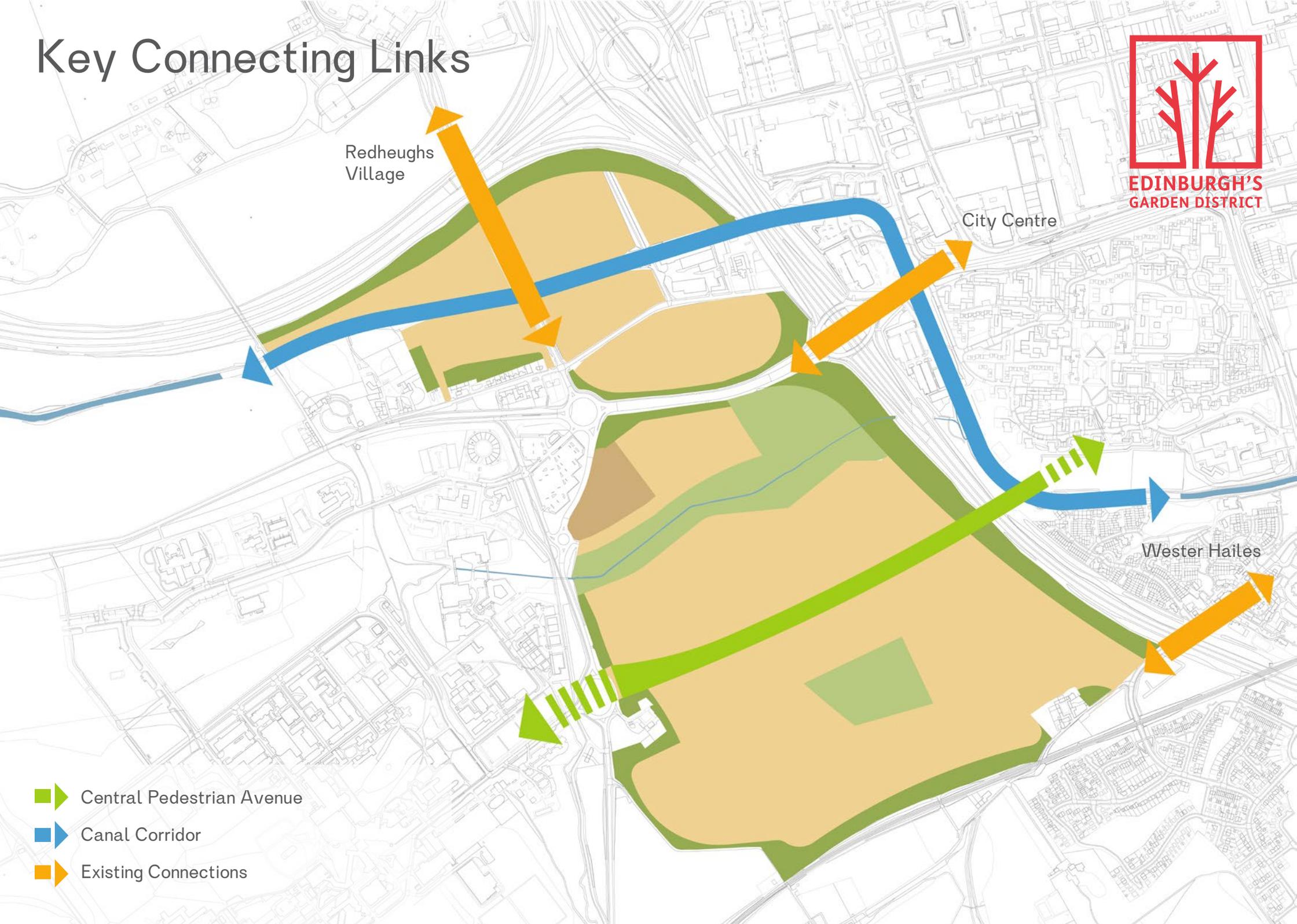


Redheughs Village

City Centre

Wester Hailes

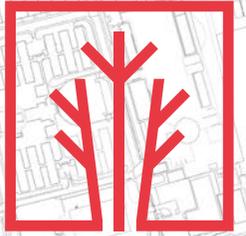
-  Central Pedestrian Avenue
-  Canal Corridor
-  Existing Connections



Green Land Bridge

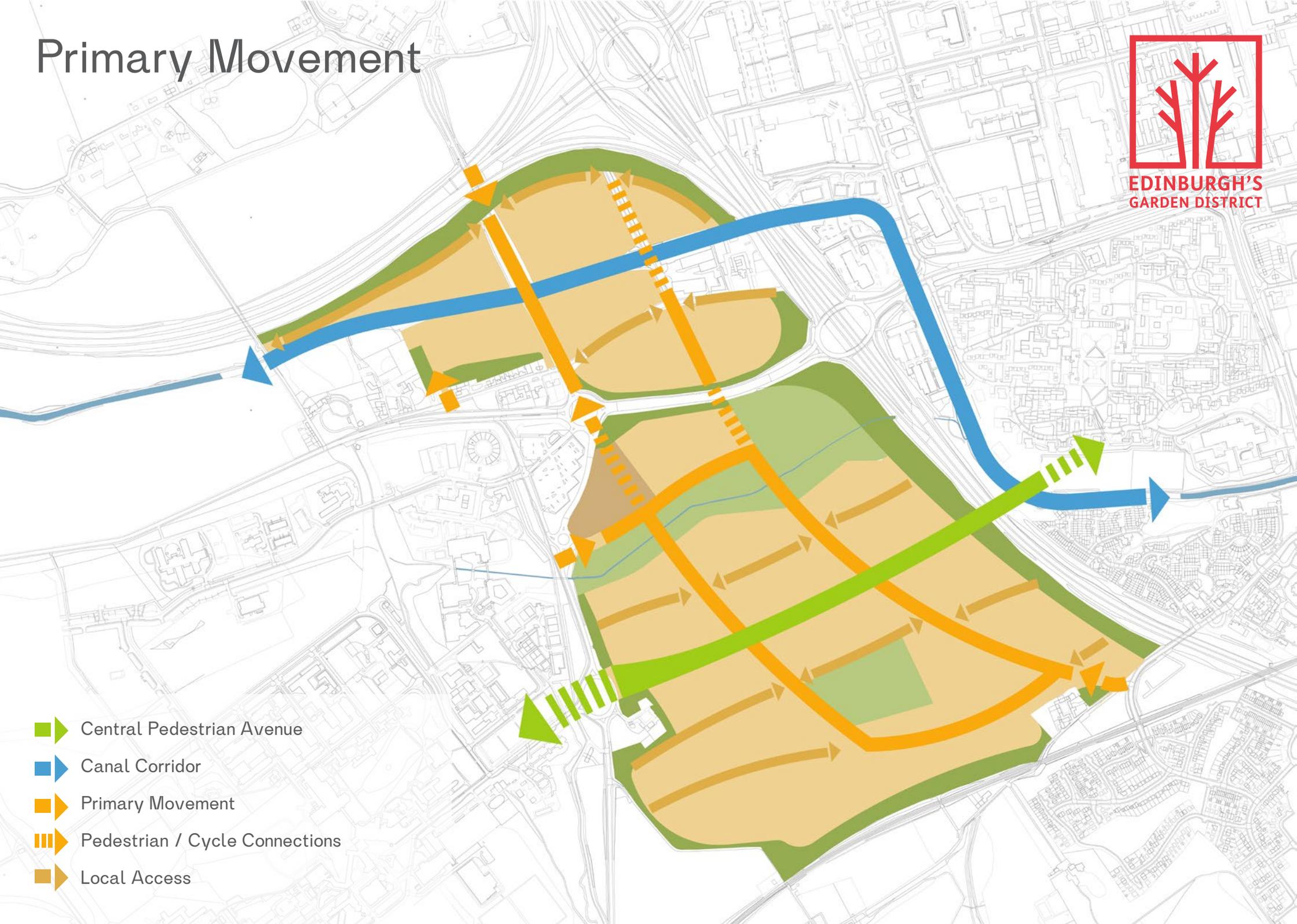


Primary Movement

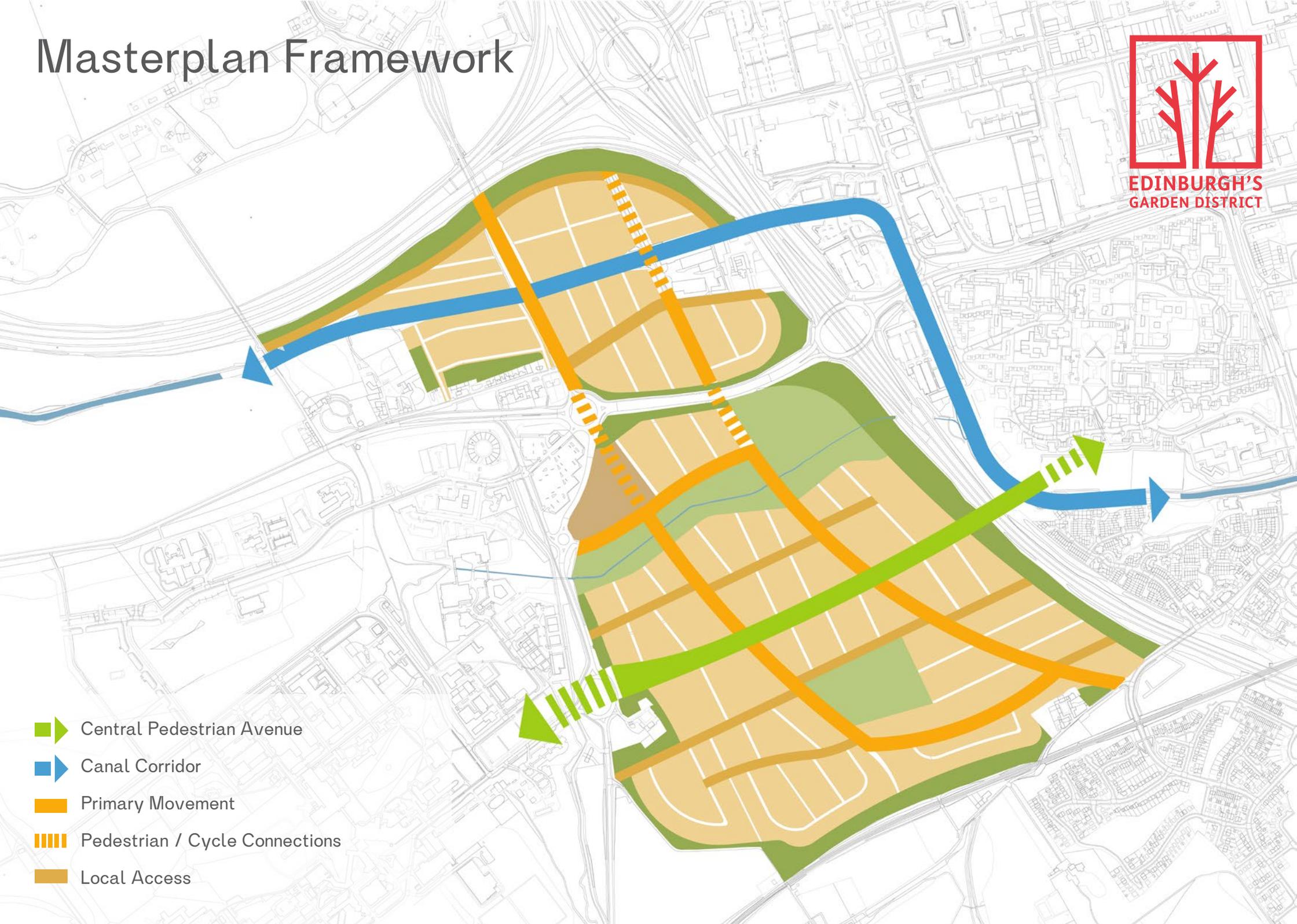


EDINBURGH'S
GARDEN DISTRICT

-  Central Pedestrian Avenue
-  Canal Corridor
-  Primary Movement
-  Pedestrian / Cycle Connections
-  Local Access

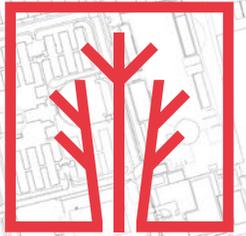


Masterplan Framework



-  Central Pedestrian Avenue
-  Canal Corridor
-  Primary Movement
-  Pedestrian / Cycle Connections
-  Local Access

Uses

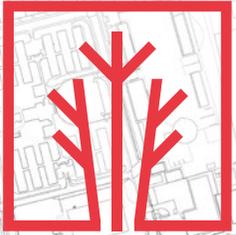


EDINBURGH'S
GARDEN DISTRICT

-  Mixed Use Centre
-  Residential-led Mixed Use
-  High Density Residential
-  Medium Density Residential
-  Education / Sports / Community



Masterplan



EDINBURGH'S
GARDEN DISTRICT



Enhancing Existing Transport Links



High Frequency Bus Corridor

Park and Ride

Pedestrian / Cycle Route

National Cycle Route

Entry Point to National Cycle Route

Railway Line

Railway Station

Tram Line

Tram Halt

Enhancing Existing Transport Links



- High Frequency Bus Corridor
- Existing Key Bus Routes
- Existing Local Bus Stop and Services
- Tram Line
- Tram Halt

A Multi-modal Green Transport Strategy



Rail



Electric Bus Loop



Tram



Walking

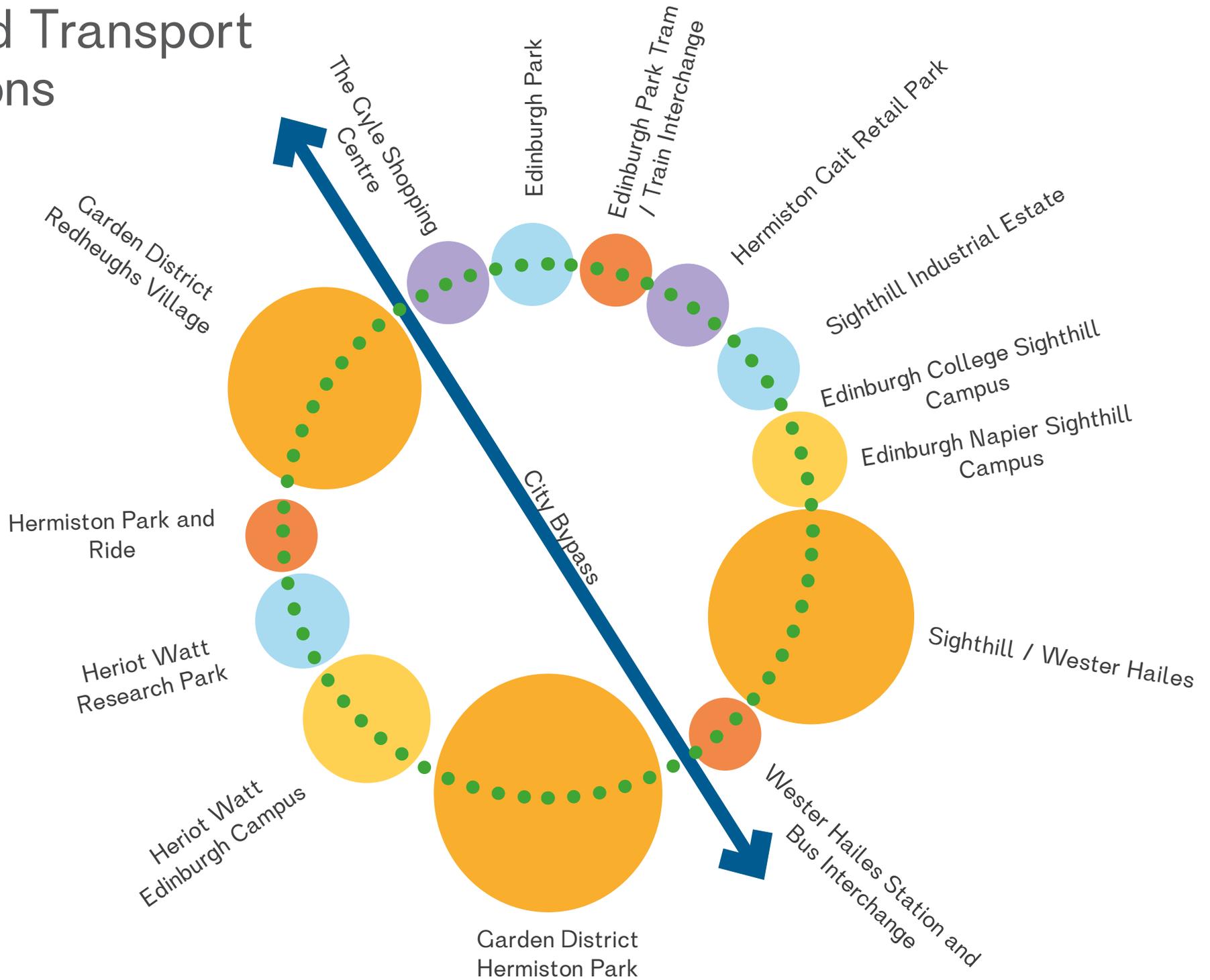


Cycling

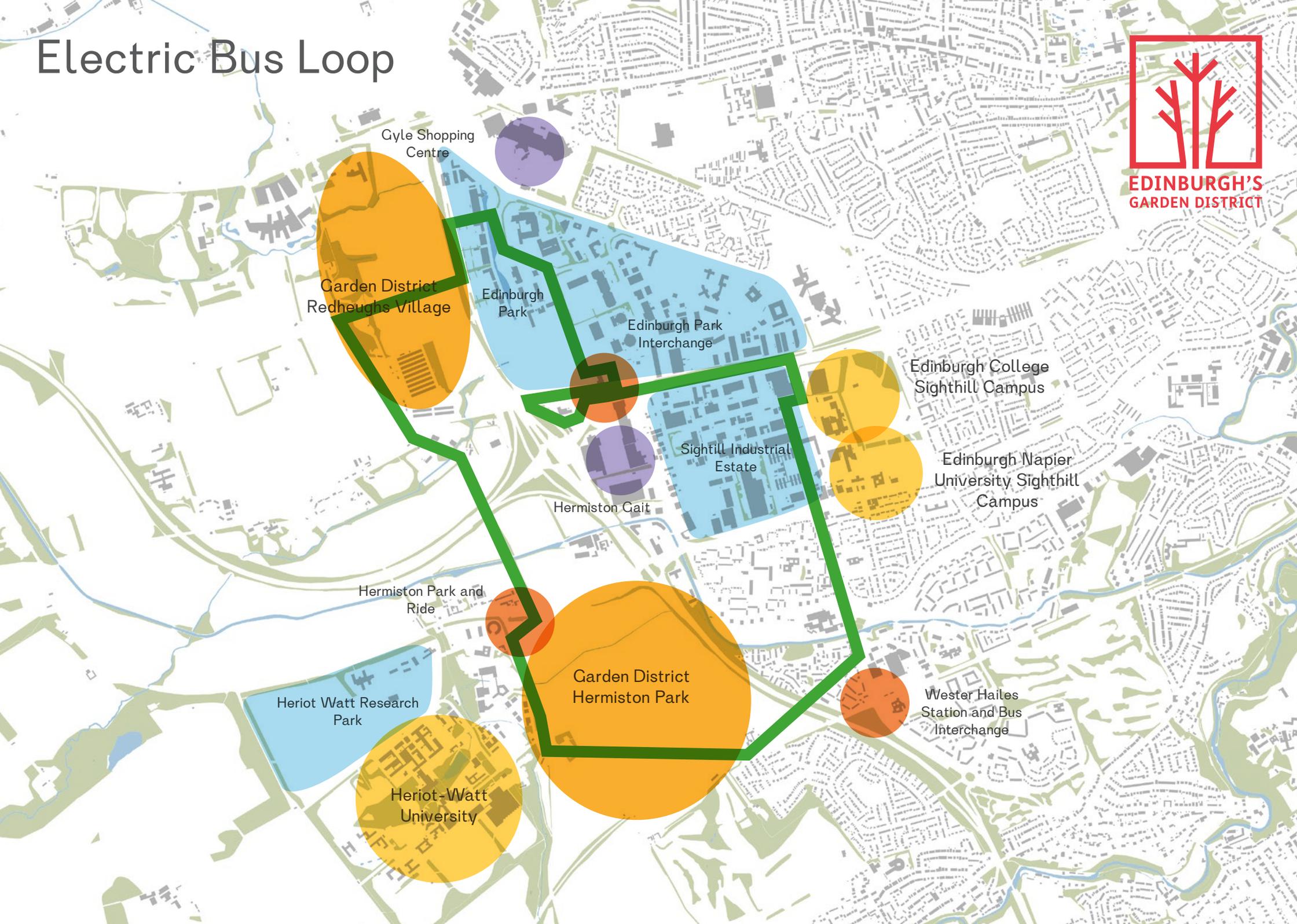


Bus Network

Integrated Transport Connections



Electric Bus Loop



Masterplan



**EDINBURGH'S
GARDEN DISTRICT**



The Hermiston Park Proposal



- Deliver over 4,000 new homes at an average density of 65 dwellings per hectare.
- Deliver more than 1,000 affordable homes.
- Put new homes next to jobs.
- Deliver new, sustainable, transport connections that capitalise on the existing infrastructure.
- Connect the city to the University.
- Connect the existing neighbourhoods to the economic and social opportunities on the city's western edge.

The Hermiston Park Proposal



- Provide mixed use amenity in terms of employment, community, health and sports facilities.
- Create new schools with the opportunity for synergies with the University.
- Deliver opportunities for complementary development to Heriot Watt's Research Park to stimulate Economic Potential.
- Create a vibrant, mixed use, place that will enhance the western edge of the city with low level impact on existing communities.
- Share the benefits of making a better, more attractive, place to facilitate Inclusive Growth.

Development Team



Developer

HolderPlanning

Planning
Consultants

7N Architects

Architects and
Masterplanners

SWECO 

Transport Planning and
Environmental Services

 **ARCADIS** | Design & Consultancy
for natural and
built assets

Project, Cost and
Commercial Management

GILLESPIES

Landscape Design and
Landscape / Visual Assessment

Goodson
Associates

Site Infrastructure, Servicing and
Sustainability

 Kaya Consulting

Hydrology and Flood
Risk Assessment

 **Playfair
Scotland**

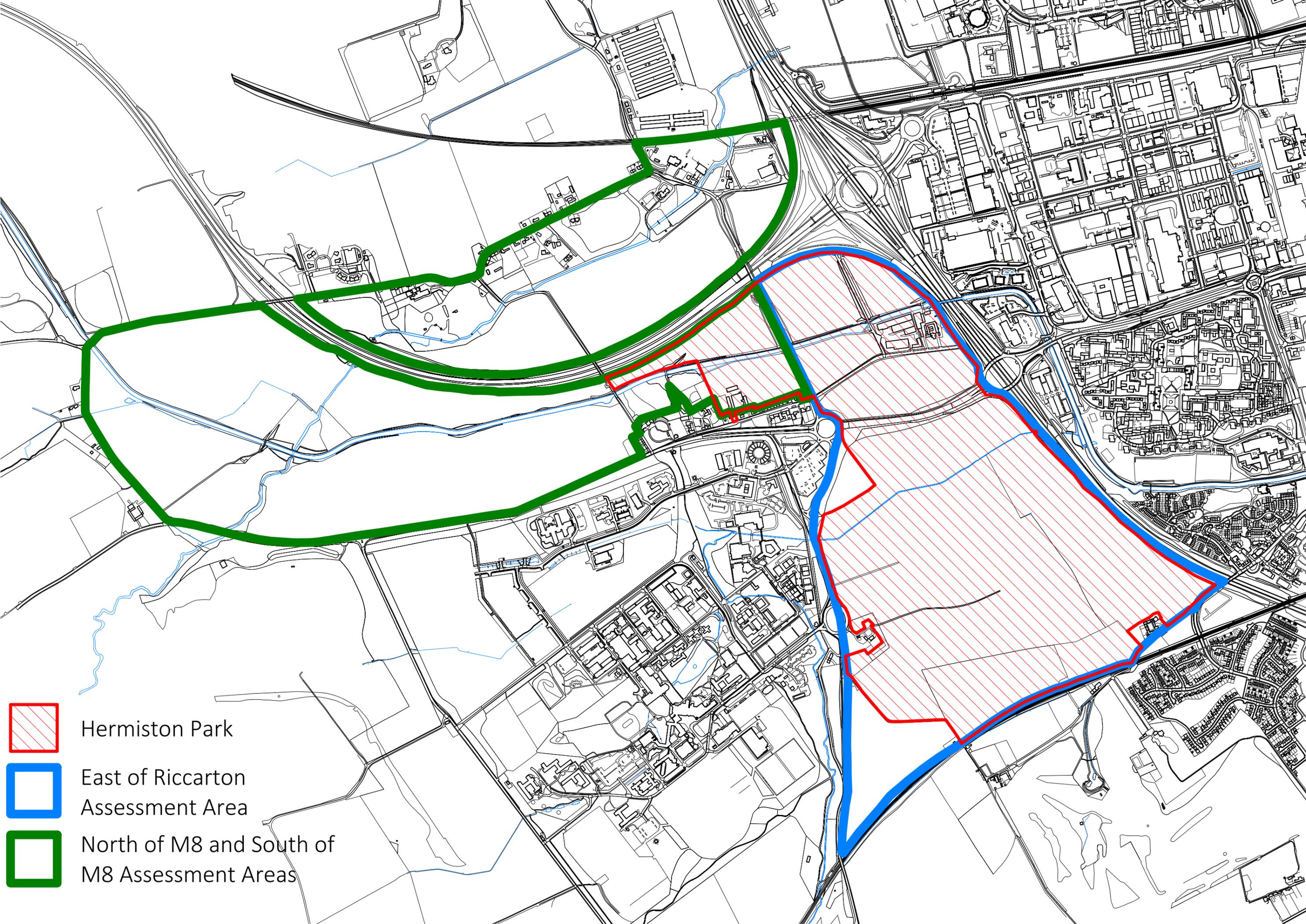
Property and Development
Communications

Masterplan



**EDINBURGH'S
GARDEN DISTRICT**





-  Hermiston Park
-  East of Riccarton Assessment Area
-  North of M8 and South of M8 Assessment Areas