Customer Ref:	00013	Response Ref:	ANON-KU2U-GWQ5-B	Supporting Info	
		Response Rei.	ANON ROZO GWQ3 D		
Name	Colin Lavety			Email colin.lavety@bartonwillmore.co.uk	
Response Type	Agent / Cons				
On behalf of:	Robertson Ho	omes Ltd			
Choice	1 A				
	•			de, regional, and national green network. We want new development to connect to, a	and
deliver this netwo	ork. Do you agr	ee with this? - Select s	upport / don't support		
Short Response	Not Answered				
Explanation					
Choice	1 B				
We want to chang	ge our policy to	require all developme	ent (including change of use) to	o include green and blue infrastructure. Do you agree with this? - Support / Object	
Short Response	Not Answered				
Explanation					

Customer Ref:	00013	Response Ref:	ANON-KU2U-GWQ5-B	Supporting Info]	
Name	Colin Lavety			Email colin.lave	ety@bartonw	illmore.co.uk	
Response Type	Agent / Consu	ltant					
On behalf of:	Robertson Hor	mes Ltd					
	,			•			
Choice	1 C						
We want to ident	ify areas that ca	n be used for future	water management to enable	adaptation to climate cha	nge. Do you a	gree with this? - Yes / N	10
Short Response	Not Answered						
Explanation							
Choice	1 D						
We want to clear Yes / No	ly set out under	what circumstances t	he development of poor quali	ty or underused open spa	ce will be con	sidered acceptable. Do	you agree with this? -
Short Response	Not Answered						
Explanation							
Choice	1 E						
We want to intro you agree with th		ra-large green space s	tandard' which recognises tha	t as we grow communities	will need acc	cess to green spaces mo	ore than 5 hectares. Do
Short Response	Not Answered						
Explanation		1					
-							

Customer Ref:	00013	Response Ref:	ANON-KU2U-GWQ5-B	Supporting Info				
Name	Colin Lavety			Email colin.lavety	@bartonwi	illmore.co.uk		
Response Type	Agent / Consu	ıltant						
On behalf of:	Robertson Ho	mes Ltd						
Choice	1 F							
We want to ident this? - Yes / No	ify specific sites	s for new allotments a	nd food growing, both as par	t of new development sites ar	nd within o	pen space in the urba	an area. Do you a	agree with
Short Response Explanation	Not Answered							
Choice	1 F							
We want to ident this? - Upload (ma		s for new allotments a	nd food growing, both as par	t of new development sites ar	nd within o	pen space in the urba	an area. Do you a	agree with
Short Response Explanation	No							
Choice	1 G							
We want to ident	ify space for ad	ditional cemetery pro	vision, including the potentia	I for green and woodland bur	ials. Do you	u agree with this? - Ye	es / No	
Short Response Explanation	Not Answered							

Customer Ref:	00013	Response Ref:	ANON-KU2U-GWQ5-B	Supporting Info		
Name	Colin Lavety			Email colin.lavety	@bartonwillmore.co.uk	
Response Type	Agent / Consu	ıltant				
On behalf of:	Robertson Ho	mes Ltd				
Choice	1 H					
We want to revis Do you agree wit			e designations to ensure that I	new green spaces have long t	erm maintenance and managemen	it arrangements in place.
, 0	<u> </u>					
Short Response	Not Answered					
Explanation						
Choice	2 A					
to climate change	•				their design will incorporate measu age and mobility issues as a key par	-
	•					-
to climate change	•					-
to climate change No	e, their future ac					-
to climate change No Short Response	Not Answered					-
to climate change No Short Response Explanation	Not Answered					-
to climate change No Short Response Explanation Choice	Not Answered Not Answered 2 B	daptability and measu	ires to address accessibility for	people with varying needs, a		rt of their layouts Yes /
to climate change No Short Response Explanation Choice We want to revis	Not Answered Not Answered 2 B	daptability and measu	ires to address accessibility for	people with varying needs, a	age and mobility issues as a key par	rt of their layouts Yes /
to climate change No Short Response Explanation Choice We want to revis	Not Answered Not Answered 2 B	daptability and measu	ires to address accessibility for	people with varying needs, a	age and mobility issues as a key par	rt of their layouts Yes /
to climate change No Short Response Explanation Choice We want to revis Yes / No	Not Answered Not Answered 2 B e our policies or	daptability and measu	ires to address accessibility for	people with varying needs, a	age and mobility issues as a key par	rt of their layouts Yes /

Customer Ref:	00013 Response Ref:	ANON-KU2U-GWQ5-B	Supporting Info	
Name	Colin Lavety		Email colin.lavety	@bartonwillmore.co.uk
Response Type	Agent / Consultant			
On behalf of:	Robertson Homes Ltd			
Choice	2 C			
We want to revise	our design and layout policies to ach	nieve ensure their layouts deliv	er active travel and connec	civity links. Do you agree with this? - Yes / No
Short Response	Not Answered			
Explanation	Not Answered			
Choice	2 D			
	opment, including student housing, t agree with this? - Yes / No	to deliver quality open space ar	nd public realm, useable for	a range of activities, including drying space, without losing
Short Response	Not Answered			
•	Not Answered			
				J
Choice	3 A			
	ings and conversions to meet the zeroneet the zeroneet the bronze, silver or gold standa			ttish Building Regulations. Instead we could require new meet? - Which standard?
•				
Short Response	Not Answered			
· · · · · · · · · · · · · · · · · · ·	Not Answered			

Customer Ref:	00013	Response Ref:	ANON-KU2U-GWQ5-B	Suppo	orting Info				
Name	Colin Lavety			Email	colin.lavety	@bartonwi	Ilmore.co.uk		
Response Type	Agent / Consu	lltant							
On behalf of:	Robertson Ho	mes Ltd	_						
Choice	4 A								
			lace Briefs for areas and sites w	•		ting the key	y elements of des	ign, layout, ar	nd transport,
education and he	ealthcare infrast	ructure development	should deliver. Do you agree w	ith this? - Yes /	No				
Short Response	Not Answered								
Explanation									
Choice	4 B								
			by our communities. City Plan 2			lace Plans c	an help us achiev	e great places	and support
community ambi	tions How sho	uld the Council work	with local communities to prep	are Local Place	Plans?				
Short Response	Not Answered								
Explanation									
Choice	5 A								
We want City Pla	n 2030 to direct	development to whe	re there is existing infrastructu	re capacity, incl	uding educat	tion, health	care and sustaina	able transport,	, or where
potential new inf	rastructure will	be accommodated ar	nd deliverable within the plan p	eriod. Do you a	gree with th	is? - Yes / N	10		
Short Response	Not Answered								
Explanation	Not Answered								

Customer Ref:	00013 Response Ref: ANON-KU2U-GWQ5-B	Supporting Info
Name	Colin Lavety	Email colin.lavety@bartonwillmore.co.uk
Response Type	e Agent / Consultant	
On behalf of:	Robertson Homes Ltd	
Choice	5 B	
•	an 2030 to set out where new community facilities are needed, and that t good sustainable public transport services. Do you agree with this? - Yes /	hese must be well connected to active travel routes and in locations with high
accessibility to go	good sustainable public transport services. Do you agree with this: - res /	
Short Response	Not Answered	
Explanation	Not Answered	
LAPIGNATION	NOT/MSWCICE	
Choice	5 C	
	ect the desire to co-locate our community services close to the communiti gree with this? - Yes / No	es they serve, supporting a high walk-in population and reducing the need to
Short Response	Not Answered	
Explanation	Not Answered	
Choice	5 D1	
		new or expanded community infrastructure. Do you agree with this? - Yes / No
we want to set o	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	Not Answord	
·		
Explanation	Not Answered	

Customer Ref:	00013 Response Ref: ANON-KU2U-GWQ5-B	Supporting Info
Name	Colin Lavety	Email colin.lavety@bartonwillmore.co.uk
Response Type	Agent / Consultant	
On behalf of:	Robertson Homes Ltd	
Choice	5 D2	
We want to use o	umulative contribution zones to determine infrastructure actions	, costs and delivery mechanisms. Do you agree with this? - Yes / No
Short Response	Not Answered	
Explanation	Not Answered	
Choice	5 E	
		r contributions within the plan, Action Programme and in non-statutory guidance. Do
you agree with th		
you agree with the	nis? - Yes / No	
you agree with th	Not Answered	
you agree with the Short Response Explanation	Not Answered Not Answered	
you agree with the Short Response Explanation Choice	Not Answered Not Answered 6 A	
you agree with the Short Response Explanation Choice We want to creat	Not Answered Not Answered 6 A See a new policy that assesses development against its ability to me	et our targets for public transport usage and walking and cycling. These targets will vary
you agree with the Short Response Explanation Choice We want to creat	Not Answered Not Answered 6 A	et our targets for public transport usage and walking and cycling. These targets will vary
you agree with the Short Response Explanation Choice We want to creat according to the	Not Answered Not Answered 6 A See a new policy that assesses development against its ability to measure and high-quality activities.	et our targets for public transport usage and walking and cycling. These targets will vary
you agree with the Short Response Explanation Choice We want to creat according to the Control of the Short Response	Not Answered Not Answered 6 A See a new policy that assesses development against its ability to me current or planned public transport services and high-quality active. Not Answered	et our targets for public transport usage and walking and cycling. These targets will vary
you agree with the Short Response Explanation Choice We want to creat according to the	Not Answered Not Answered 6 A See a new policy that assesses development against its ability to measure and high-quality activities.	et our targets for public transport usage and walking and cycling. These targets will vary

Customer Ref:	00013 Response Ref: ANON-KU2U-GWQ5-B	Supporting Info
Name	Colin Lavety	Email colin.lavety@bartonwillmore.co.uk
Response Type	Agent / Consultant	
On behalf of:	Robertson Homes Ltd	
Choice	6 B	
	lace Briefs to set the targets for trips by walking, cycling and ping levels to support high use of public transport. Do you agre	public transport based on current and planned transit interventions. This will determine see with this? - Yes / No
Short Response	Not Answered	
Explanation	Not Answered	
Choice	7 A	
	mine parking levels in development based on targets for trips will be supported by other measures to control on-street parl	by walking, cycling and public transport. These targets could be set by area, development king. Do you agree with this? - Yes / No
Short Response	Not Answered	
Explanation	Not Answered	
Choice	7 B	
We want to prote you agree with the	·	ty centre to support the delivery of the Council's city centre transformation programme. Do
Short Response	Not Answered	
Explanation	Not Answered	

Customer Ref:	00013	Response Ref:	ANON-KU2U-GWQ5-B	Supp	orting Info				
Name	Colin Lavety			Emai	colin.lavety	/@bartonw	illmore.co.uk		
Response Type	Agent / Consu	ultant							
On behalf of:	Robertson Ho	mes Ltd							
Choice	7 C								
We want to upda agree with this? -		policies to control den	nand and to support parking	g for bikes, those v	vith disabiliti	es and elec	tric vehicles via ch	narging infra	structure. Do you
Short Response	Not Answered								
Explanation	Not Answered								
	1								'
Choice	7 D								
Mobility Plan or i	ts action plan. [Oo you agree with this	cure by safeguarding sites for ? - We want to support the d in the City Mobility Plan or	city's park and rid					=
Short Response	Not Answered								
Explanation	Not Answered								
Choice	8 A								
We want to upda	te our policy or	the Cycle and Footpa	th Network to provide crite	ria for identifying	new routes.	Do you agr	ee with this? - Yes	s / No	
Short Response	Not Answered								
Explanation	Not Answered								

Customer Ref:	00013	Response Ref:	ANON-KU2U-GWQ5-B	Supporting Info		
Name	Colin Lavety			Email colin.lavety	@bartonwillmore.co.uk	
Response Type	Agent / Consultan	t				
On behalf of:	Robertson Homes	Ltd				
Choice	8 B					
					d cycling links around the city, we want y are delivered. Do you agree with this?	
Short Response	Not Answered					
Explanation						
Choice	8 C					
to include any ne	_	avel links which m	nay be identified in the forthco		ptions for allocated sites. We also want ort Appraisal, the City Mobility Plan, or v	-
Short Response	Not Answered					
Explanation	Not Answered					
Choice	8 C					
to include any ne	w strategic active tr	avel links which m	_		ptions for allocated sites. We also want ort Appraisal, the City Mobility Plan, or v	-
Short Response Explanation	No					

Customer Ref:	00013	Response Ref:	ANON-KU2U-GWQ5-B	Supporting Info			
Name	Colin Lavety			Email colin.lave	ty@bartonwillmore.co.uk		
Response Type	Agent / Consul	tant					
On behalf of:	Robertson Hon	nes Ltd					
Choice	9 A						
			of Edinburgh, as a 'Short Tele ee with this approach? - Yes	_	lanning permission will alw	ays be required f	for the change of
Short Response	Not Answered						
Explanation	Not Answered						
Choice	9 B						
		n the loss of homes t	o alternative uses. This new p	policy will be used when plar	ning permission is required	d for a change of	use of residential
			mmodation or other uses. Do				
Short Response	Not Answered						
Explanation	Not Answered						
Choice	10 A						
		urpose-built student	housing. We want to ensure	that student housing is deliv	vered at the right scale and	in the right locat	ions, helps create
sustainable comn	nunities and look	ks after student's we	lbeing. Do you agree with th	is? - Yes / No			
Short Response	Not Answered						
Explanation	Not Answered						

0 1	DOGA DE LA LONG DE LA	
Customer Ref:	00013 Response Ref: ANON-KU2U-GWQ5-B	Supporting Info
Name	Colin Lavety	Email colin.lavety@bartonwillmore.co.uk
Response Type	Agent / Consultant	
On behalf of:	Robertson Homes Ltd	
Choice	10 B	
We want to creat this? - Yes / No	e 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
Short Response	Not Answered	
Explanation	Not Answered	
Choice	10 C	
	e a new policy promoting the better use of stand-alone out of centr would be supported. Do you agree with this? - Yes / No	e retail units and commercial centres, where their redevelopment for mixed use
-		
Short Response	Not Answered	
Explanation	Not Answered	

6	50042 AVOV WV3V	
Customer Ref:	00013 Response Ref: ANON-KU2U-C	
Name	Colin Lavety	Email colin.lavety@bartonwillmore.co.uk
Response Type	Agent / Consultant	
On behalf of:	Robertson Homes Ltd	
Choice	11 A	
We want to ame	d our policy to increase the provision of affordable h	nousing requirement from 25% to 35%. Do you agree with this approach? - Yes / No
Short Response Explanation		nousing being delivered through housing developments in Edinburgh in accordance with Scottish would not be in the best interests of some of the larger housing sites across Edinburgh. We therefore
	Ultimately, any increase in the affordable housing recopolicy areas (of the plan) and therefore this matter ne not act as a barrier to private developers bringing lan	housing from 25% to 35% and would suggest that the policy in this regard is made more flexible. quirement needs to be given priority over increasing the financial burden on homebuilders in other eds to be considered holistically. In this regard, increased affordable housing requirements should d forward for development which could make significant contributions to housing completions in thip with the development industry to secure unique and innovative solutions to affordable housing
Choice	11 B	
We want City Pla	2030 to require a mix of housing types and tenures	- we want the plan to be prescriptive on the required mix, including the percentage requirement for

family housing and support for the Private Rented Sector. Do you agree with this? - Yes / No

Short Response No

Explanation

We object to the inclusion of mandatory housing mixes being prescribed within City Plan 2030, such as requirements to include a proportion of family housing and support for the private rented sector etc. This does not necessarily support option 2 for the market lead delivery of greenfield sites. Instead, we recommend that CEC adopt a flexible 'case by case' approach to the delivery of affordable housing, including family housing, where site specific requirements and other characteristics could dictate the suitable housing mix on a site. it is considered that this approach would support the best interests of the market and viability whilst also providing suitable flexibility for future occupiers – ultimately resulting in an overall increase in the delivery of affordable housing on the ground.

Name Colin Lavety Response Type Agent / Consultant On behalf of: Robertson Homes Ltd Colin.lavety@bartonwillmore.co.uk	Customer Ref:	00013 Response Ref: ANON-KU2U-GWQ5-B	Supporting Info
	Name	Colin Lavety	Email colin.lavety@bartonwillmore.co.uk
On behalf of: Robertson Homes Ltd	Response Type	Agent / Consultant	
	On behalf of:	Robertson Homes Ltd	

Choice 12 Δ

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

Short Response Option 2 (Market/

Explanation

Choices for City Plan 2030 identifies a number of sites across Edinburgh in line with the 3 housing options suggested, ranging from an approach concentrated on solely urban development to an approach concentrating on only greenfield development, implicating the release of green belt land. We understand that CEC's preferred approach in addressing hosing land requirements within City Plan 2030 is to pursue Housing Option 1 (Urban Area) — where housing development would be concentrated within the urban area, potentially via compulsory purchase opportunities. On behalf of Robertson, we object to the implementation of Housing Option 1 within Choices for City Plan 2030 as it would: • Byoid exploring legitimate opportunities for green belt release: • But extra pressure on CEC and the housebuilding industry to deliver housing within constrained brownfield sites — therefore jeopardising future growth: Pail to meet essential housing need and demand; and Nould disregard opportunities to develop suitable and sustainable greenfield sites with an appropriate programme of phasing. Ultimately, we consider that pursuing Housing Option 1 would risk a housing land shortfall within Edinburgh in the Plan period. It would also result in complicated compulsory purchase requirements which CEC already accept are likely to be difficult, costly and timely to implement. further delaying potential housing delivery. Housing Option 2 (Greenfield Release) considers a market led approach to housing delivery in Edinburgh, which incorporates the release of significant areas of green belt, something that we agree is critical to deliver the required housing sought by City Plan 2030. In addition to this, Option 2 provides appropriate flexibility in the market for a variety of housing types to come forward within the Plan period. On this basis, we support the principle of Housing Option 2 within the Choices for City Plan 2030 however we object that the site is not allocated for housing within this option and request its inclusion as a housing site within City Plan 2030. Housing Option 3 – (Blended Approach) also incorporates the release of some green belt land to address potential housing delivery within the city. Again, we support in principle Housing Option 3 in this regard, however, we object to the site's exclusion as an allocated housing site and request that it be allocated for housing within City Plan. Accordingly, we respectfully request that CEC pursue Housing Option 2 (Greenfield Release) for delivering housing within the city. We support in principle this approach for housing delivery within the city, but we object that the site is not allocated for housing within this option nor within Housing Option 3 (Blended Approach). In this regard, we request that the status of our site in Kirkliston is changed and the current allocation within the Countryside Policy Area in the LDP removed. Instead, the site should be supported as an allocated housing site within both options - as part of a new housing development around the southern fringes of Kirkliston. In this regard, the allocation of the site for housing would offer CEC an opportunity to secure much needed contributions towards infrastructure provision, including contributions towards a new primary school and a new secondary school in Kirkliston, for which the need has been identified in Choices for City Plan 2030. The allocation of the site would also allow CEC to secure an extension to the urban boundary of Kirkliston in an appropriate location, strengthening the boundary of the town alongside the M9 with access to existing transportation links. It is for these reasons that we believe Option 2 - delivery through market housing by releasing greenfield land - is the most suitable option to address housing delivery within CEC. We respectfully request CEC proceed with this option subject to an amendment that allows for the site to be allocated for housing within City Plan 2030.

Customer Ref:	00013	Response Ref:	ANON-KU2U-	GWQ5-B	Suppo	orting Info				
Name	Colin Lavety				Email	colin.lavety	/@bartonw	illmore.co.uk		
Response Type	Agent / Consulta	ant								
On behalf of:	Robertson Home	es Ltd								
					•					
Choice	12 B1									
Do you support o	or object to any of	the proposed greer	nfield areas? (Pl	lease tick all tha	t apply) - Suppo	ort Greenfield	d - Support	- Calderwood		
Short Response	Not Answered									
Explanation										
•										
Choice	12 B2									
		the proposed greer	nfield areas? (Pl	lease tick all tha	t apply) - Suppo	ort Greenfield	d - Support	- Kirkliston		
	,	p								
Short Response	Vec									
Explanation	163									
LAPIAHACIOH										
Choice	12 B3		6.11					= !! !		
Do you support o	or object to any of	the proposed greer	ntield areas? (P	lease tick all tha	t apply) - Suppo	ort Greenfield	d - Support	- West Edinburg	<u>;h</u>	
Short Response	Not Answered									
Explanation										

Customer Ref:	00013 Response Ref: ANON-KU2U-GWC	5-B Supporting Info
Name	Colin Lavety	Email colin.lavety@bartonwillmore.co.uk
Response Type	Agent / Consultant	
On behalf of:	Robertson Homes Ltd	
Choice	12 B4	
Do you support o	r 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 o	r object to any of the proposed greenfield areas? (Please	tick all that apply) - Support Greenfield - Support - South East Edinburgh
Short Response	Not Answered	
Short Response Explanation	Not Answered	
	Not Answered	
	Not Answered	
	Not Answered 12 B6	
Explanation Choice	12 B6	tick all that apply) - Support Greenfield - Object - Calderwood
Explanation Choice	12 B6	tick all that apply) - Support Greenfield - Object - Calderwood
Explanation Choice	12 B6 r object to any of the proposed greenfield areas? (Please	tick all that apply) - Support Greenfield - Object - Calderwood
Explanation Choice Do you support of	12 B6 r object to any of the proposed greenfield areas? (Please	tick all that apply) - Support Greenfield - Object - Calderwood
Choice Do you support of Short Response	12 B6 r object to any of the proposed greenfield areas? (Please	tick all that apply) - Support Greenfield - Object - Calderwood

Customer Ref:	00013	Response Ref:	ANON-KU2U-GWQ5-B	Suppor	ting Info		
Name	Colin Lavety			Email	colin.lavety@barton	willmore.co.uk	
Response Type	Agent / Consulta	ant					
On behalf of:	Robertson Home	es Ltd	-				
Choice	12 B7						
Do you support o	r object to any of	the proposed green	field areas? (Please tick all tha	t apply) - Suppor	t Greenfield - Object	t - Kirkliston	
Short Response	Not Answered						
Explanation							
Choice	12 B8						
Do you support o	r object to any of	the proposed green	field areas? (Please tick all tha	t apply) - Suppor	t Greenfield - Object	t - West Edinburgh	
Short Response	Not Answered						
Explanation							
Choice	12 B9						
Do you support o	r object to any of	the proposed green	field areas? (Please tick all tha	t apply) - Suppor	t Greenfield - Object	t - East of Riccarton	
Short Response	Not Answered						
Explanation							

Customer Ref:	00013 Response Ref: ANON-KU2U-GWQ5-B	Supporting Info	
Name	Colin Lavety	Email colin.lavety@bartonwillmore.co.uk	
Response Type	Agent / Consultant		
On behalf of:	Robertson Homes Ltd		
			_
Choice	12 B10		
Do you support or	r object to any of the proposed greenfield areas? (Please tick all that	apply) - Support Greenfield - Object - South East Edinburgh	
Short Response	Not Answered		
Explanation	·		

Customer Ref:	00013 Response Ref: ANON-KU2U-GWQ5-B	Supporting Info
Name	Colin Lavety	Email colin.lavety@bartonwillmore.co.uk
Response Type	Agent / Consultant	
On behalf of:	Robertson Homes Ltd	

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 note that our site (land at New Liston Road) has not been included within Options 2 (Green Belt Release) nor Option 3 (Blended Approach) for housing whilst a large portion to the north of Kirkliston has been included. Whilst Robertson support the principle of additional development within Kirkliston within Housing Options 2 and 3, it is contended that our site should also be included within the housing around this settlement. It is considered the site's allocation for housing would help contribute to the delivery of a large number of units across Edinburgh as well as helping contribute to a new strengthened settlement edge along the M9, with suitable landscape mounds and planting to reinforce the green belt edge. Whilst Choices for City Plan 2030 express concerns over the level of planning permissions issued versus housing completions through market lead development, associated with Housing Option 2, it is clear that there is a willing developer ready to proceed with drive to allow for housing development to be completed within the Plan period. As such, City Plan 2030 is required to allocate sufficient housing land to accommodate housing need and demand in places, like Kirkliston, with excellent connectivity to Edinburgh City Centre, within a strong housing market and, ultimately, where people want to live. The River Almond Core Pathway is located to the south eastern edge of the site – identified in the adopted LDP as Policy Tra 9 – Cycle and Footpath Network (Reference: T7). The proposed development of the site would not compromise accessibility objectives, but rather, its presence supports access to the wider network increasing potential access to sustainable forms of travel and supporting the site's sustainability credentials. Accordingly, given the need for variation to CEC's proposed development strategy and the potential release of this greenfield site for housing, the site would be perfectly positioned to benefit from revised spatial strategy pursuing the release of green belt and Countryside Policy Area allocations to deliver potential housing on the urban edge of Kirkliston. This is further strengthened by the site's location offering CEC an ideal opportunity to secure development on an effective site, with a committed major housebuilder with an established track record of delivery, that can be integrated with the existing settlement and brought forward without any significant barriers to development. In terms of housing land supply, overall, we object to the preferred approach CEC have taken towards housing land supply, by limiting the development of greenfield sites under Option 1 (Urban Area). We believe that such an approach is overly conservative and lacks the degree of flexibility needed to accommodate wider aspirations within the Choices for City Plan 2030 Spatial Strategy to deliver affordable, varied housing stock in sustainable locations to accommodate the needs of Edinburgh's growing population. CEC should avoid over-dependence on piecemeal, complex brownfield sites for the delivery of new homes. This dependence, without considering the release of additional green belt sites (such as the site) could risk the delivery of effective housing land supply within CEC. The ability to provide up to 27,900 homes during the plan period under Housing Option 2 provides such flexibility and should be supported. However, the limited approach under Option 1 could only deliver 17,600 homes which could fall well short of housing delivery targets within the Plan period. Accordingly, we believe it is in the interests of CEC to prepare for longer-term future growth that is expected to come forward in the industry in Edinburgh and proceed with Housing Option 2 (Green Belt Release).

Customer Ref:	00013	Response Ref:	ANON-KU2U-GWQ5-B	Suppo	orting Info			
Name	Colin Lavety			Email	colin.lavety	@bartonwi	illmore.co.uk	
Response Type	Agent / Consul	ltant						
On behalf of:	Robertson Hor	nes Ltd	·					
Choice	12 C							
Do you have a gre	enfield site you	wish us to consider in	n the proposed Plan? - Greenfie	eld file upload				
Short Response	Yes							
Explanation								
Choice	12 C							
Do you have a gre	enfield site you	wish us to consider in	n the proposed Plan? - Greenfie	eld file upload				
Short Response	No							
Explanation								
·								
Choice	12 C							
		wish us to consider in	n the proposed Plan? - Greenfie	ald file unload				
Do you have a give	emicia site you	Wish as to consider h	Title proposed Flair: - Greening	ia ilic apioaa				
Chart Bassansa	No							
Short Response	INO							
Explanation								

Customer Ref:	00013	Response Ref:	ANON-KU2U-GWQ5-B	Supporting	Info				
Name	Colin Lavety			Email colir	n.lavety@	bartonwillm	ore.co.uk		
Response Type	Agent / Consultant								
On behalf of:	Robertson Homes	Ltd							
Choice	12 D								
Do you have a bro	ownfield site you wis	sh us to consider i	in the proposed Plan? - Brown	field sites upload					
Short Response	No								
Explanation									
Choice	13 A								
			for social enterprises, start-up: agree with this? - Yes / No	, culture and tourism	n, innovat	tion and lear	ning, and the I	ow carbon se	ector, where there
Short Response	Not Answered								
Explanation	Not Answered								
•									
Choice	14 A								
inclusive, sustaina		do this through 'a	ting public transport infrastruc an area of search' which allows No		_		•		
Short Response	Not Answered								
Explanation									
*									

Customer Ref:	00013 Response Ref: ANON-KU2U-GWQ5-B	Supporting Info
Name	Colin Lavety	Email colin.lavety@bartonwillmore.co.uk
Response Type	Agent / Consultant	
On behalf of:	Robertson Homes Ltd	
Choice	14 B	
	ove the safeguard in the existing plan for the Royal Highland Showg	ground site to the south of the A8 at Norton Park and allocate the site for other uses. Do
Short Response	Not Answered	
Explanation		
Choice	14 C	
	n 2030 to allocate the Airport's contingency runway, the "crosswin ou agree with this approach? - Yes / No	ds runway" for the development of alternative uses next to the Edinburgh Gateway
Short Response	Not Answered	
Explanation		
Choice	15 A	
		O will protect and enhance the city centre as the regional core of south east Scotland
providing shopping	ng, commercial leisure, and entertainment and tourism activities. D	Do you agree with this? - Yes / No
Chart Bearance	Not Answered	
•	Not Answered Not Answered	
LAPIAIIAUUII	INOL Alloweled	

Customer Ref:	00013	Response Ref:	ANON-KU2U-GWQ5-B	Supporting Info		
Name	Colin Lavety			Email colin.lavety	@bartonwillmore.co.uk	
Response Type	Agent / Consultan	t				<u> </u>
On behalf of:	Robertson Homes	Ltd				
Choice	15 B					
	•	•			w local centres) justified by the Commo	•
Short Response	Not Answered					
Explanation	Not Answered					
Choice	15 C					
	•		including the potential for ne the outcomes of the City Mobi		indary changes where they support was / No	alking and cycling
Short Response	Not Answered					
Explanation	Not Answered					
Choice	15 D					
balance of uses w	ithin our centres to	maintain their vi			retail patterns and trends, and ensure ould stop using supplementary guidan	
Short Response	Not Answered					
Explanation	Not Answered					

Customer Ref:	00013 Response Ref: ANON-KU2U-GWQ5-B	Supporting Info
Name	Colin Lavety	Email colin.lavety@bartonwillmore.co.uk
Response Type	Agent / Consultant	
On behalf of:	Robertson Homes Ltd	
Choice	15 E	
We want to supp this approach? - \		er locations with good public transport access throughout Edinburgh. Do you agree with
Short Response	Not Answered	
Explanation	Not Answered	
Choice	15 G	
	ek to reduce the quantity of retail floorspace within centres in favor any growing demand. Do you agree with this approach? - Yes / No	ur of alternative uses such as increased leisure provision and permit commercial centres
	any growing demands to you agree than and approach.	
Short Response	Not Answered	
Explanation	Not Answered	
Explanation	Not All Swelled	
Choice	16 A1	
	inue to support office use at strategic office locations at Edinburgh . Do you agree? - Yes / No	Park/South Gyle, the International Business Gateway, Leith, the city centre, and in town
Short Response	Not Answered	
Explanation	Not Answered	

Customer Ref:	00013 Response Ref: ANON-KU2U-GWQ5-B	Supporting Info
Name	Colin Lavety	Email colin.lavety@bartonwillmore.co.uk
Response Type	Agent / Consultant	
On behalf of:	Robertson Homes Ltd	
Choice	16 A2	
We want to supp	ort office development at commercial centres as these also provide	e accessible locations Yes / No
Short Response	Not Answered	
Explanation	Not Answered	
Choice	16 A3	
We want to stren	gthen the requirement within the city centre to provide significant	office floorspace within major mixed-use developments. Do you agree? - Yes / No
Short Response	Not Answered	
Explanation	Not Answered	
Choice	16 A4	
We want to ame	nd the boundary of the Leith strategic office location to remove are	eas with residential development consent. Do you agree? - Yes / No
Short Response	Not Answered	
Explanation	Not Answered	

Customer Ref:	00013	Response Ref:	ANON-KU2U-GWQ5-B	Suppo	rting Info			
Name	Colin Lavety			Email	colin.lavety	@bartonwi	illmore.co.uk	
Response Type	Agent / Consu	ultant						
On behalf of:	Robertson Ho	omes Ltd						
Choice	16 A5							
We want to conti	nue to support	office development in	other accessible locations else	where in the u	ban area. Do	you agree	? - Yes / No	
Short Response	Not Answered							
Explanation	Not Answered							
Choice	16 A5							
We want to conti consider in the pr		office development in	other accessible locations else	where in the u	ban area. Do	you agree	? - Do you have an office si	te you wish us to
Short Response								
Explanation								
Choice	16 B							
We want to ident	ify sites and loo	cations within Edinbur	gh with potential for office dev	elopment. Do y	ou agree wit	th this? - Ye	es/No	
·	Not Answered							
Explanation	Not Answered							

Customer Ref:	00013	Response Ref:	ANON-KU2U-GWQ5-B	Supporting Info	
Name	Colin Lavety			Email colin.lavety@barto	onwillmore.co.uk
Response Type	Agent / Consu	ltant			
On behalf of:	Robertson Hor	mes Ltd			
Choice	16 C				
use, unless existi	ng office space is	s provided as part of o	denser development. This wou	ıld apply across the city to recognise	elopment of office buildings other than for office e that office locations outwith the city centre and policy only in the city centre Yes / No
Short Response	Not Answered				
Explanation	Not Answered				
Choice	16 E1				
		r new modern busine	ss and industrial sites to provid	e necessary floorspace at the follow	ving locations. Do you agree? - Yes / No -
Support - Leith St				,	
Short Response	Not Answered				
Explanation					
Choice	16 E2				
We want to ident Support - Newbri		new modern busine	ss and industrial sites to provid	e necessary floorspace at the follow	ving locations. Do you agree? - Yes / No -
Short Response	Niat Amania				
•	Not Answered				
Explanation	Not Answered				

Customer Ref:	00013	Response Ref:	ANON-KU2U-GWC	Q5-B	Supporting	g Info						
Name	Colin Lavety				Email coli	in.lavety@b	partonwill	more.co.uk	<u> </u>			
Response Type	Agent / Consul	tant										
On behalf of:	Robertson Hon	nes Ltd										
	·											_
Choice	16 E3											
We want to ident Support - Newcra		new modern busines Estate.	s and industrial site	es to provide ne	cessary floorspa	ce at the fo	ollowing lo	cations. Do	o you agree	e? - Yes / I	No -	
Short Response Explanation	Not Answered											
Choice	16 E4											
We want to ident Support - The Cro		new modern busines	s and industrial site	es to provide ne	cessary floorspa	ce at the fo	ollowing lo	cations. Do	o you agree	e? - Yes / I	No -	
Short Response Explanation	Not Answered											
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	Not Answered											

Customer Ref:	00013	Response Ref:	ANON-KU2U-GV	WQ5-B	Suppo	orting Info						
Name	Colin Lavety				Email	colin.lavety	/@bartonv	villmore.c	o.uk			
Response Type	Agent / Consultan	t										
On behalf of:	Robertson Homes	Ltd										
Choice	16 E6											
We want to ident support - Newbrid	ify proposals for ned dge	w modern busines	ss and industrial s	ites to provide	necessary floo	rspace at the	e following	g location	s. Do you a	igree? - Yes	; / No - Do r	iot
Short Response	Not Answered											
Explanation												
Choice	16 E7											
	ify proposals for ne ighall Industrial Esta		ss and industrial s	ites to provide	necessary floo	rspace at the	e following	g location	s. Do you a	igree? - Yes	; / No - Do r	not
Short Response Explanation	Not Answered											
Choice	16 E8											
We want to ident support - The Cro	ify proposals for ne sswinds Runway	w modern busines	ss and industrial s	ites to provide	necessary floo	rspace at the	e following	g location	s. Do you a	agree? - Yes	; / No - Do r	not
Short Response	Not Answered											

Explanation

Customer Ref:	00013 Response Ref: ANON-KU2U-GWQ5	-B Supporting Info
Name	Colin Lavety	Email colin.lavety@bartonwillmore.co.uk
Response Type	Agent / Consultant	
On behalf of:	Robertson Homes Ltd	
Choice	16 EX	
We want to ident	ify proposals for new modern business and industrial sites	to provide necessary floorspace at the following locations. Do you agree? - Explain why
Short Response	Not Answered	
Explanation	Not Answered	
Choice	16 F	
		nent of urban sites and considered in Place Briefs for greenfield sites. We want to set out the
amount expected		nent of urban sites and considered in Place Briefs for greenfield sites. We want to set out the tible business space, and how to deliver it, including the location on-site, and considering
amount expected	to be re-provided, clearer criteria on what constitutes flex	
amount expected	to be re-provided, clearer criteria on what constitutes flex	
amount expected adjacent uses, se	I to be re-provided, clearer criteria on what constitutes flear rvicing and visibility. Do you agree? - Yes / No	
amount expected adjacent uses, se	I to be re-provided, clearer criteria on what constitutes fleat rvicing and visibility. Do you agree? - Yes / No Not Answered	
amount expected adjacent uses, se	I to be re-provided, clearer criteria on what constitutes fleat rvicing and visibility. Do you agree? - Yes / No Not Answered	
amount expected adjacent uses, se Short Response Explanation	Not Answered Not Answered 16 G	tible business space, and how to deliver it, including the location on-site, and considering
amount expected adjacent uses, se Short Response Explanation	Not Answered Not Answered 16 G	
amount expected adjacent uses, se Short Response Explanation Choice We want to conti	Not Answered Not Answered 16 G inue to protect industrial estates that are designated under	tible business space, and how to deliver it, including the location on-site, and considering
amount expected adjacent uses, se Short Response Explanation Choice We want to continue Short Response	Not Answered Not Answered 16 G inue to protect industrial estates that are designated under	tible business space, and how to deliver it, including the location on-site, and considering
amount expected adjacent uses, se Short Response Explanation Choice We want to conti	Not Answered Not Answered Not Answered Not Answered Not Answered Not Answered	tible business space, and how to deliver it, including the location on-site, and considering

Customer Ref:	00013	Response Ref:	ANON-KU2U-GWQ5-B	Supporting Info			
Name	Colin Lavety			Email colin.lavety@ba	bartonwillmore.co.uk		
Response Type	Agent / Consu	ltant					
On behalf of:	Robertson Ho	mes Ltd					
Choice	16 H						
We want to intro	duce a policy th	at provides criteria fo	r locations that we would supp	ort city-wide and neighbourhoo	d goods distribution hubs. Do you a	igree? - Yes / No	
Short Response	Not Answered						
Explanation	Not Answered						

Representation to the City of Edinburgh Council 'City Plan 2030' Proposed Plan

Land at New Liston Road Kirkliston, Edinburgh

Prepared on behalf of Robertson Homes Ltd

April 2020



Representation to the City of Edinburgh Council 'City Plan 2030' Proposed Plan

Land at New Liston Road Kirkliston, Edinburgh

Prepared on behalf of Robertson Homes Ltd

Project Ref:	31570/3	31570/3
Status:	Draft	Issue
Issue/Rev:	1	2
Date:	19 March 2020	9 April 2020
Prepared by:	PJ/SI	PJ
Checked by:	SI/CL	CL
Authorised by:	CL	CL

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APPENDICES

Appendix A – Site Location Plan

Appendix B – Concept Masterplan

1.0 INTRODUCTION

- 1.1 This representation has been prepared by Barton Willmore on behalf of Robertson Homes Ltd ('Robertson') in relation to land at New Liston Road, Kirkliston ('the site') refer to Appendix A. It provides a response to City of Edinburgh Council's ('CEC') 'Choices for City Plan 2030' effectively CEC's Local Development Plan Main Issues Report ('MIR') which is currently being consulted upon.
- 1.2 It has been prepared to respond specifically to City Plan 2030 'Choice 11 Delivering more affordable homes' and 'Choice 12 Building our new homes and infrastructure' which are of most relevance to Robertson.
- 1.3 In this regard, the representation **supports in principle** Housing Option 2 (Greenfield Release) and Option 3 (Blended Approach). We request that CEC proceed with Housing Option 2 **subject to** CEC allocating the site for housing within City Plan 2030.
- 1.4 Robertson also **object** to CEC taking forward their preferred approach for housing delivery under Housing Option 1 (Urban Area) which seeks to deliver new housing development within the urban area and all greenfield site proposals remain undeveloped.
- 1.5 For the reasons contained within this representation, we respectfully request that Housing Option 2 is taken forward to deliver new housing within Kirkliston and that the site is included as a housing allocation within the City Plan 2030.
- 1.6 The remainder of this representation provides further details of the site; the merits of proceeding with Housing Option 2; the constraints associated with Housing Option 1; and the benefits of bringing the site forward for housing development within City Plan 2030.
- 1.7 This representation should also be considered alongside the following accompanying supporting information:
 - Site Location Plan (Appendix A); and
 - Concept Masterplan (Appendix B).

2.0 BACKGROUND CONTEXT

The Site

- 2.1 The site comprises a c.6 hectare parcel of land located to the south west of Kirkliston on the west of the urban edge of Edinburgh. It is located to the west of New Liston Road and comprises a former arable agricultural field.
- 2.2 The site benefits from a sustainable location, being within 400m of bus stops to the city with a bus route passing the south easterly boundary of the site and close proximity to Newbridge and Kirkliston. The site lies adjacent to the River Almond (to the south) and the M9 Motorway (to the west). Residential properties on Maitland Hog Lane are located to the north of the site, beyond the Niddry Burn.
- 2.3 The allocation of this site for housing in the City Plan 2030 would provide a well-connected southern extension to Kirkliston providing a robust settlement edge alongside the three proposed housing sites located to the north of Kirkliston which will increase housing supply within this area.

Indicative Site Layout

- 2.4 A Concept Masterplan (refer to Appendix B) has been prepared to demonstrate the capacity of the site and to outline how the future design can respond to the site characteristics in the immediate area and integrate with existing housing to the north. It includes a total developable area of 3.5ha which could range from a capacity of between approximately 100 200 units depending on the proposed housing density, housing type and housing mix etc. It also shows indicative development blocks outlining how the site could potentially be configured to allow for the creation of a varied, attractive housing layout that incorporates a suitable landscaped setting whilst also maintaining the residential amenity of surrounding occupiers.
- 2.5 This includes development within the northern part of the site (on either side of the existing burn) to allow for open space, landscape buffers, structure planting or acoustic bunds along the western or southern parts of the site.
- 2.6 The Concept Masterplan also accounts for areas of medium to high flood risk and the layout is informed by these factors by placing the aforementioned landscaping and open space etc within these areas. Sustainable Urban Drainage Systems (SuDS) have been provided within the north-eastern part of the site to allow successful discharge to the nearby water course. In addition, the Concept Masterplan shows potential opportunities to link the site to the adjacent Core Path Network and the primary vehicular access.

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- 2.7 It sets out initial design principles that could then be translated into a detailed design that would accord with CEC's Local Development Plan Policies and Edinburgh Design Guidance.
- 2.8 Moreover, Robertson are committed to preparing detailed technical studies and agreeing design principles to ensure that any constraints are fully addressed allowing for the development of the site for housing in the short term.
- 2.9 Specific documentation that could be provided include studies on landscape (Landscape and Visual Appraisal), transport (transport statement), noise (Noise Impact Assessment), flooding (Flood Risk Assessment) and ecology (Preliminary Ecological Appraisal). Additionally, any future design solution would also provide structure planting that creates a strong boundary to the southern part of Kirkliston.

3.0 RESPONSE TO CHOICES FOR CITY PLAN 2030

3.1 The following provides a response to the relevant questions within the Choices for City Plan 2030.

Affordable Housing and Mix

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

- 3.2 Whilst we agree with a minimum of 25% affordable housing being delivered through housing developments in Edinburgh in accordance with Scottish Planning Policy ('SPP'), the proposed increase to 35% would not be in the best interests of some of the larger housing sites across Edinburgh. We therefore **object** to a mandatory blanket increase in affordable housing from 25% to 35% and would suggest that the policy in this regard is made more flexible. Ultimately, any increase in the affordable housing requirement needs to be given priority over increasing the financial burden on homebuilders in other policy areas (of the plan) and therefore this matter needs to be considered holistically.
- 3.3 In this regard, increased affordable housing requirements should not act as a barrier to private developers bringing land forward for development which could make significant contributions to housing completions in Edinburgh. There is scope for CEC to work in partnership with the development industry to secure unique and innovative solutions to affordable housing delivery.

Mixed Housing Tenure

Choice 11B. We want City Plan 2030 to require a mix of housing types and tenures – we want the plan to be prescriptive on the required mix, including the percentage requirement for family housing and support for the Private Rented Sector. Do you agree with this?

- 3.4 This representation **objects** to the inclusion of mandatory housing mixes being prescribed within City Plan 2030, such as requirements to include a proportion of family housing and support for the private rented sector etc. This does not necessarily support option 2 for the market lead delivery of greenfield sites.
- 3.5 Instead, we recommend that CEC adopt a flexible 'case by case' approach to the delivery of affordable housing, including family housing, where site specific requirements and other characteristics could dictate the suitable housing mix on a site. it is considered that this approach would support the best interests of the market and viability whilst also providing suitable flexibility for future occupiers ultimately resulting in an overall increase in the delivery of affordable housing on the ground.

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Housing Options

Choice 12 - Building our new homes and infrastructure

12A. Which option do you support? e.g. urban, greenfield or blended

- 3.6 Choices for City Plan 2030 identifies a number of sites across Edinburgh in line with the 3 housing options suggested, ranging from an approach concentrated on solely urban development to an approach concentrating on only greenfield development, implicating the release of green belt land.
- 3.7 We understand that CEC's preferred approach in addressing hosing land requirements within City Plan 2030 is to pursue <u>Housing Option 1 (Urban Area)</u> where housing development would be concentrated within the urban area, potentially via compulsory purchase opportunities.
- 3.8 On behalf of Robertson, we **object** to the implementation of Housing Option 1 within Choices for City Plan 2030 as it would:
 - · Avoid exploring legitimate opportunities for green belt release;
 - Put extra pressure on CEC and the housebuilding industry to deliver housing within constrained brownfield sites – therefore jeopardising future growth;
 - · Fail to meet essential housing need and demand; and
 - Would disregard opportunities to develop suitable and sustainable greenfield sites with an appropriate programme of phasing.
- 3.9 Ultimately, we consider that pursuing Housing Option 1 would risk a housing land shortfall within Edinburgh in the Plan period. It would also result in complicated compulsory purchase requirements which CEC already accept are likely to be difficult, costly and timely to implement, further delaying potential housing delivery.
- 3.10 <u>Housing Option 2 (Greenfield Release)</u> considers a market led approach to housing delivery in Edinburgh, which incorporates the release of significant areas of green belt, something that we agree is critical to deliver the required housing sought by City Plan 2030. In addition to this, Option 2 provides appropriate flexibility in the market for a variety of housing types to come forward within the Plan period.
- 3.11 On this basis, we **support the principle** of Housing Option 2 within the Choices for City Plan 2030 however we **object** that the site is not allocated for housing within this option and request its inclusion as a housing site within City Plan 2030.
- 3.12 <u>Housing Option 3 (Blended Approach)</u> also incorporates the release of some green belt land to address potential housing delivery within the city. Again, we **support in principle** Housing

Option 3 in this regard, however, we **object** to the site's exclusion as an allocated housing site and request that it be allocated for housing within City Plan 2030.

Conclusion

- 3.13 Accordingly, we respectfully request that CEC pursue <u>Housing Option 2 (Greenfield Release)</u> for delivering housing within the city. We **support in principle** this approach for housing delivery within the city, but we **object** that the site is not allocated for housing within this option nor within Housing Option 3 (Blended Approach).
- 3.14 In this regard, we request that the status of site is changed and the current allocation within the Countryside Policy Area in the LDP removed. Instead, the site should be supported as an allocated housing site within both options as part of a new housing development around the southern fringes of Kirkliston.
- 3.15 In this regard, the allocation of the site for housing would offer CEC an opportunity to secure much needed contributions towards infrastructure provision, including contributions towards a new primary school and a new secondary school in Kirkliston, for which the need has been identified in Choices for City Plan 2030. The allocation of the site would also allow CEC to secure an extension to the urban boundary of Kirkliston in an appropriate location, strengthening the boundary of the town alongside the M9 with access to existing transportation links.
- 3.16 It is for these reasons that we believe Option 2 delivery through market housing by releasing greenfield land is the most suitable option to address housing delivery within CEC. We respectfully request CEC proceed with this option subject to an amendment that allows for the site to be allocated for housing within City Plan 2030.

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

Support for the Potential Development of 'Greenfield Areas'

Spatial Strategy

Potential Site Allocation within City Plan 2030

- 3.17 The site has not been included within Options 2 (Green Belt Release) nor Option 3 (Blended Approach) for housing whilst a large portion to the north of Kirkliston has been included.
- 3.18 Whilst Robertson **support** the principle of development within Kirkliston within Housing Options 2 and 3, it is contended that the site should also be included within the housing around this settlement.

- 3.19 It is considered the site's allocation for housing would help contribute to the delivery of a large number of units across Edinburgh as well as helping contribute to a new strengthened settlement edge along the M9, with suitable landscape mounds and planting to reinforce the green belt edge.
- 3.20 Whilst Choices for City Plan 2030 express concerns over the level of planning permissions issued versus housing completions through market lead development, associated with Housing Option 2, it is clear that there is a willing developer ready to proceed with drive to allow for housing development to be completed within the Plan period. As such, City Plan 2030 is required to allocate sufficient housing land to accommodate housing need and demand in places, like Kirkliston, with excellent connectivity to Edinburgh City Centre, within a strong housing market and, ultimately, where people want to live.
- 3.21 The River Almond Core Pathway is located to the south eastern edge of the site identified in the adopted LDP as Policy Tra 9 Cycle and Footpath Network (Reference: T7). The proposed development of the site would not compromise accessibility objectives, but rather, its presence supports access to the wider network increasing potential access to sustainable forms of travel and supporting the site's sustainability credentials.
- 3.22 Accordingly, given the need for variation to CEC's proposed development strategy and the potential release of this greenfield site for housing, the site would be perfectly positioned to benefit from revised spatial strategy pursuing the release of green belt and Countryside Policy Area allocations to deliver potential housing on the urban edge of Kirkliston. This is further strengthened by the site's location offering CEC an ideal opportunity to secure development on an effective site, with a committed major housebuilder with an established track record of delivery, that can be integrated with the existing settlement and brought forward without any significant barriers to development.

Spatial Strategy & Housing Allocations

- 3.23 Overall, we object to the preferred approach CEC have taken towards housing land supply, by limiting the development of greenfield sites under Option 1 (Urban Area). We believe that such an approach is overly conservative and lacks the degree of flexibility needed to accommodate wider aspirations within the Choices for City Plan 2030 Spatial Strategy to deliver affordable, varied housing stock in sustainable locations to accommodate the needs of Edinburgh's growing population.
- 3.24 CEC should avoid over-dependence on piecemeal, complex brownfield sites for the delivery of new homes. This dependence, without considering the release of additional green belt sites (such as the site) could risk the delivery of effective housing land supply within CEC.

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3.25 The ability to provide up to 27,900 homes during the plan period under Housing Option 2 provides such flexibility and should be supported. However, the limited approach under Option 1 could only deliver 17,600 homes which could fall well short of housing delivery targets within the Plan period. Accordingly, we believe it is in the interests of CEC to prepare for longer-term future growth that is expected to come forward in the industry in Edinburgh and proceed with Housing Option 2 (Green Belt Release).

Role of Existing Countryside Policy Area

3.26 The site falls within an area designated as Countryside Policy Area in the LDP, however, the site is largely bisected to the west of Kirkliston by the M9 Motorway and to the south by the River Almond. As such, its role in providing countryside objectives is greatly diminished. The proposed development for housing would give CEC the opportunity to secure a new strengthened Countryside Policy Area to the south of the site, beyond the manmade infrastructure and physical infrastructure outlined above. Provisions would be made to the site to deliver strategic landscape and structure planting along the site's southern and western boundaries to mitigate any visual impact arising from the proposed development.

4.0 TECHNICAL CONSIDERATIONS

'Choice 12C. Do you have any greenfield site you wish us to consider in the Proposed Plan?'

Recommended Greenfield Site

Introduction

- 4.1 This representation **objects** to the site's exclusion as a potential housing allocation within any housing delivery option within Choices for City Plan 2030. We therefore respectfully request that the site is allocated for housing within City Plan 2030.
- 4.2 The following demonstrates that strategic policy objectives within Choices for City Plan 2030 would be met through the site's allocation for housing and that the site is suitable for housing development. This section considers potential technical considerations that would influence the suitability of the site for housing development including:
 - Sustainability;
 - Access & Transportation;
 - Noise;
 - Landscape & visual impact;
 - Flood risk;
 - · Site Layout & Design; and
 - Effectiveness.
- 4.3 The Design Team has prioritised the production of work to consider these matters and Robertson are fully committed to preparing relevant technical assessments, as required going forward, to demonstrate the site's effectiveness and guide the form and detail of the future layout within the site.
- 4.4 This work based on initial preliminary work will demonstrate that none of the above technical constraints are insurmountable and that they would not prevent development of the site for housing in the short term. In this regard, there are no physical or technical constraints that would prevent or inhibit the site from being developed for the proposed residential use in the short-term.

Sustainability

4.5 The site is located within walking distance of Kirkliston town centre. It also has good access to sustainable transport options with access to bus stops within Gateside Road and Milrig Cottages – which are both comfortably within 400m walking distance. The site also has direct access to the River Almond Core Path.

- 4.6 SEPA indicative flood maps show part of the site is at medium-high risk of flooding and therefore the design will provide suitable mitigation measures for this part of the site including avoiding housing within this area. It is recognised there will be some impact on the existing green infrastructure. However, the site is currently inaccessible to the public so opportunities to improve open space, landscaping and/or green network infrastructure could facilitate increased connectivity to green/open space and help deliver green network enhancements within this area.
- 4.7 The site does not fall within any heritage designations. In addition, it will be situated within close proximity to an area designated by CEC as employment land further strengthening the site's sustainability credentials and CEC's aspirations to create mixed uses communities that can discourage trips by private car etc.

Access & Transportation

- 4.8 The Concept Masterplan identifies the proposed vehicular access to/from the site to New Liston Road. It demonstrates that this access is feasible and that there is a commitment from Robertson to prepare detailed transport engineering layouts to confirm visibility splays and radii requirements etc as part of any future detailed design. This outcome would ensure that safe, efficient vehicular manoeuvrability could be provided to/from the site.
- 4.9 In addition, the nature of the surrounding road network is considered sufficient to accommodate the likely traffic demands associated with the proposed development. As a result, it is considered that the site and proposals are in line with CEC's transportation priorities and policy requirements. As part of any future accompanying Transport Statement/Assessment, a review of junction capacity analysis would also be undertaken to ensure safety and efficiency of the network is not compromised, with mitigation identified, if necessary.

Noise

- 4.10 The site is located directly to the east of the M9 Motorway. Suitable separation and/or noise attenuation would be implemented as part of any future detailed design to mitigate any potential adverse amenity impacts to future residents.
- 4.11 Suitable noise mitigation measures are likely to include landscape mounds along the western boundary to reduce potential traffic noise associated with the nearby motorway. This is in line with CEC's aspirations for other potential housing sites around Kirkliston within Map 12: Areas 3 Kirkliston which are also within close proximity to the motorway or road traffic noise.
- 4.12 Additionally, land to the east of Kirkliston, to the east of the River Almond is identified as safeguarded land to potentially accommodate an extension to Edinburgh airport. Given that this safeguarded area lies some distance from the Site, and will have been defined with

generous parameters, it is not considered that the future development of the site for housing would be impacted, particularly given that CEC are proposing housing far closer to this safeguarded area to the north-east of Kirkliston.

Landscape and Visual Impact

- 4.13 It is considered that the site's location, directly adjacent to the core settlement of Kirkliston, and bounded by the M9 Motorway and River Almond, demonstrates the suitability of extending and 'completing' the Kirkliston urban area to the south. It would also allow for any future development to successfully integrate with the existing built form within this area.
- 4.14 As such, Robertson are committed to preparing a Landscape and Visual Appraisal that will seek to demonstrate that the site can be designed to respond to, and enhance, the existing built and landscape character within this area and, in effect, that future housing development would create the new robust settlement edge to this settlement.

Flood Risk

4.15 SEPA Flood Maps identify that the majority of the site is not subject to a high risk of flooding. They also show that the south-eastern corner of the site has a medium risk of fluvial flooding. As such, any future development would be avoided within this area. Suitable attenuation measures would also be implemented in line with SEPA guidelines to address surface water management and to control offsite flows to pre-development levels. This would ensure that the majority of the site could be developed without any potential flooding impacts either within the site or beyond.

Site Layout & Design

- 4.16 The Concept Masterplan (Appendix B) showing a developable area of c. 3.5ha and a capacity of between approximately 100 200 units accompanies this representation. It is considered that the layout, as presented, responds to the site characterises and potential constraints to demonstrate the suitability of housing within this location.
- 4.17 Specifically, the Concept Masterplan:
 - Creates design principles that create a confined development boundary within the northern and central parts of the site and avoiding any potential flood risk areas to the south-east, allowing for expansive landscape and open space areas within the remainder of the site;
 - Provides structure planting along key site boundary to enclose the proposed housing development and to provide a robust landscaped boundary to the settlement edge;
 - Contains a network of linked greenspaces, which can connect to the adjacent Core Path to the south and continuity of green infrastructure within this location;

- Proposes medium density housing which could integrate effectively with surrounding built form and minimise potential landscape and visual impacts;
- Creates suitable SuDS attenuation measures in the form of attenuation basins that would allow for appropriately design discharge to the nearby water environment but also the creation of biodiversity enhancements within this area; and
- Considers the way in which the river interacts with the site including flooding constraints and creates an innovative design approach that appropriately responds to this.
- 4.18 Based on the above, it is considered that the Concept Masterplan demonstrates that a positive, sensitively designed residential environment can be provided within the site. The potential density is such that the resultant units would provide for a mix of homes that would allow for a varied housing mix, scale, design and tenure.

Effectiveness

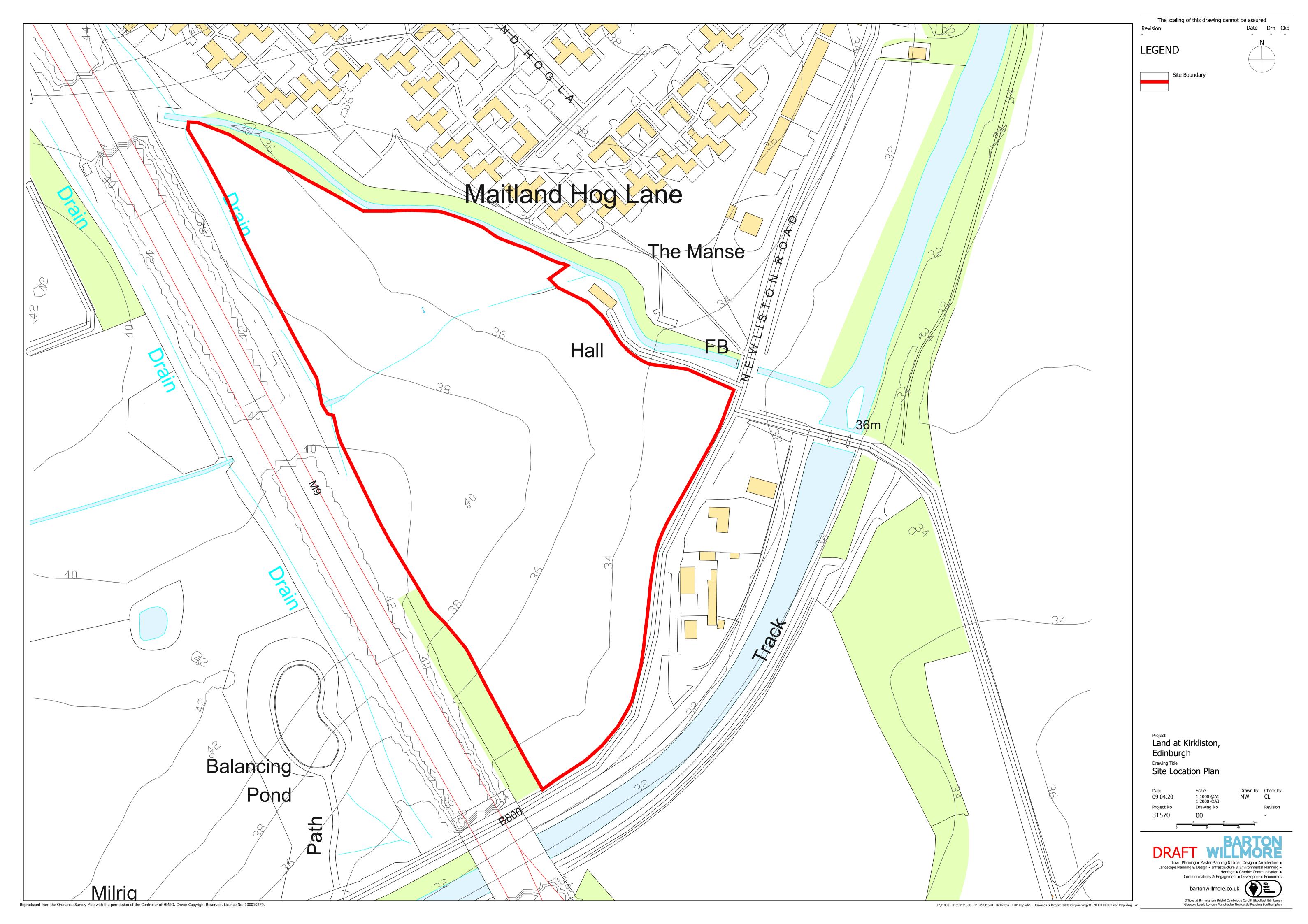
- 4.19 Based on the tests set out within PAN 2/2010, the site is considered to be effective and the opportunities and constraints presented have informed an appropriate design response to the site which can be delivered in phases, as required within the Plan period.
- 4.20 The site is available and, with Robertson as a committed major housebuilder, construction would commence within the Plan period.
- 4.21 In summary, based on the criteria within the PAN:
 - Ownership: the site is in the control of Robertsons, who can bring the site forward for development;
 - <u>Physical:</u> any technical constraints relating to the site can be addressed to allow development to proceed;
 - <u>Contamination:</u> due to the history of the site, it is not considered likely to have any contamination;
 - Deficit Funding: no public funding is required delivery residential development on the site:
 - <u>Marketability:</u> the site has house builder support (through Robertson) and can be delivered promptly;
 - <u>Infrastructure:</u> any required infrastructure can be provided realistically by Robertson; and
 - Land use: housing is the sole preferred use of the land.

5.0 CONCLUSION

- 5.1 This representation demonstrates that the site at Kirkliston lies within a sustainable location and is suitable for housing delivery within the Plan period. The development of this greenfield site is backed up by CEC giving consideration to greenfield sites within Housing Options 2 (Greenfield Release) and 3 (Blended Approach) in City Plan 2030. The site is effective, with a committed developer Robertson who are fully committed to developing the site within the Plan period.
- 5.2 Critically in the context of the proposed City Plan 2030, educational provision relating to the site (between 100 200 units depending on the anticipated density and housing types/mix etc) has been considered in the context of the wider development in the west of Edinburgh and any future development of the site would include contributions towards the provision of new schools, transport and other infrastructure required to support future development of Kirkliston.
- 5.3 Moreover, a programme of phasing could be agreed with CEC to coincide other improvements to transport and educational infrastructure improvements to avoid any infrastructure capacity restrictions within the immediate area.
- 5.4 The Concept Masterplan is of high quality and shows the commitment to deliver a residential environment which integrates well with its surroundings. The site is also extremely accessible in terms of sustainable transport linkages and is within walking distance to Kirkliston town centre. Upgrade works to the road to New Liston Road could also provide the required vehicular access for the scale of development proposed.
- 5.5 Accordingly, we believe that Option 2 delivery through market housing by releasing greenfield land is the most suitable option to address housing delivery within CEC. We respectfully request CEC proceed with this approach, however, we object if an amendment is not undertaken to allocate the site for housing site within City Plan 2030.
- 5.6 This will provide CEC with an opportunity to secure a high-quality residential extension to the urban area of Kirkliston, providing new housing (including affordable housing) and providing Kirkliston with a new strong urban boundary to the south.

APPENDIX A SITE LOCATION PLAN

31570/3 April 2020



APPENDIX B CONCEPT MASTERPLAN

31570/3 April 2020

