

Customer Ref:

00311

Response Ref:

ANON-KU2U-GWEP-T

Supporting Info

Name

Christopher Lindley

Email

chris@heatonplanning.co.uk

Response Type

Agent / Consultant

On behalf of:

Tarmac Trading Limited

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

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

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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

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

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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? - Yes / No

Short Response

Explanation

Choice 1 F

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

Short Response

Explanation

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

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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

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: No

Explanation
The density of proposed housing development is currently assessed against Policy HOU4 Housing Density of the Edinburgh Development Plan. This policy requires an “appropriate” density having regard to the site’s characteristics and those of the surrounding areas. The Edinburgh Local Development Plan 2016 acknowledges the many benefits to higher density development, as such proposals make efficient use of land and encourages the effective provision of public transport. However, this has to be balanced against the local context of a development proposals where higher density is not always appropriate. Tarmac support the principles of planning policies seeking to make the most efficient use of land. However, given the varied characteristics of the communities within the City’s administrative areas a blanket approach to meeting minimum density targets is not appropriate. Seeking a high density of development across the entire plan area may lead to forms of development which do not reflect surrounding context leading to no development to support existing communities in rural settings. In applying a strict approach to gross development densities in the Plan, also provides limited scope for variations in approach to urban design and place making which appropriately reflect their surroundings. To meet the objective of the emerging LDP, a key ambition for Edinburgh is to “be a sustainable city with the right types and quality of new homes and neighbourhoods, in the right locations, with the right infrastructure.” The use of minimum density targets would be more appropriate for certain parts of the plan area (i.e. main town and city centres). It would be more appropriate to optimise the density of developments in settlements that are well served by public transport. As mentioned previously, Ratho has access to existing public bus routes and a railway station. Geographically, it is also well related to the international Airport. An appropriate development density for future housing sites outside of the main towns and cities in more rural settings can be achieved through individual site allocations as part of the forthcoming development plan, such as the Tarmac landholding at Ratho. This in turn would clearly outline to Applicants the expected yield for individual sites which would be appropriate for its context and availability of infrastructure. Indicative density ranges of between 25 and 30 dwellings per hectare have been applied to residential elements of our proposal with a 70% developable parameter set for the proposed leisure and tourism offer.

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Choice **2 C**

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

Short Response

Explanation

Choice **2 D**

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

Short Response

Explanation

Choice **3 A**

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

Short Response

Explanation

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Choice **4 A**

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

Short Response

Explanation

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

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

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

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Choice **6 B**

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

Short Response

Explanation

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

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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

Choice **7 D**

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

Short Response

Explanation

Choice **8 A**

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

Short Response

Explanation

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Choice **8 B**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

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Choice **9 A**

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

Short Response

Explanation

Choice **9 B**

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

Short Response

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

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Choice **10 B**

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

Short Response

Explanation

Choice **10 C**

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

Short Response

Explanation

It is clear to achieve sustainable forms of development, housing proposals should take place in settlements where a reasonable range of employment, services, community facilities, leisure, tourism, recreation and public transport networks exist or can be provided. The City Plan approach to Q10.C provides an opportunity to optimise the delivery of housing and other appropriate development around “stand alone out of centre retail units and commercial centres”. Our view is that this could quite easily be expanded to include other existing and developing ‘centres’ for the community and wider area including leisure and tourism uses which are located on the periphery of existing communities which already contain services and facilities. In the case of our client’s landholding, this includes the “Edinburgh International Climbing Arena”, “Wavegarden Scotland” and the “Union Canal”. The allocation of the land to the north of Ratho, primarily for future housing delivery not only secures a valued contribution to the identified housing requirement but also links to these principles which aid sustainable development in a holistic way.

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Choice 11 A

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

Short Response: No

Explanation

The Choices Plan aim to set the policy context in which affordable market housing can be delivered. It is accepted that there is a clear need to deliver more market and affordable homes. The provisions of affordable housing requirement should be fully assessed against housing need and demand. It is acknowledged that a Housing Need and Demand Assessment has been carried out to support the Proposed Strategic Development Plan 2 (SDP2). However, as mentioned previously, Scottish Ministers decided to reject the plan in May 2019 as the Plan had not been informed by adequate transport evidence. Notwithstanding this, the SDP2 provides a strong indication of the Council's housing strategy, and notes that the City of Edinburgh is expected to deliver approximately 45% of the number of homes for the period 2018-2030. Which gives the Choices Plan a target of 22,600 units of market housing and 20,800 affordable homes for a similar period of 2019-2032 (City Plan 2030, Housing Study). The City Plan 2030 housing evidence base acknowledges a gradual increase in supply of affordable homes in recent years, however, notwithstanding the increase it is still significantly below the level necessary for the council to meet its objective of delivering 20,000 homes by 2027. The Housing Study indicates an increase from 25% to 35% could be achievable. However, this is based on land values in Edinburgh which will undoubtedly vary across the city and fluctuate over time. The Council should be mindful that the cumulative burden of policy requirements and financial contributions are not set too high that the majority of housing sites become undeliverable due to viability, which is encouraged by the SPP. The details of provision, which will reflect housing need and individual site suitability, will be a matter for agreement between the developer and the Council. Whilst Tarmac would provide support for different forms of affordable housing, a more flexible policy approach is needed. Therefore, it may be more appropriate to vary the affordable housing contributions in high pressured areas, setting out priority locations for the development of affordable housing and specific tenures where a higher percentage of contribution will be required (reflecting the approach implemented by Stirling Council which is acknowledged in the City Plan evidence base). This approach would ensure more affordable housing contributions are secured in areas of most need. This approach meets the requirements of the NPF3 which aims to facilitate new housing development in areas within our cities network where there is continuing pressure for growth and rural housing provision. The enclosed Concept Masterplan at Section 5 illustrates a clear potential to deliver affordable housing integrated throughout market unit provisions and access to new community and leisure facilities. The site supports housing deliver in an appropriate location and fulfils the council's objectives to meet housing need and create strong, sustainable communities.

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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

Short Response

Explanation The SPP (Paragraph 115) requires local planning authorities to carry out robust Housing Need and Demand Assessments, to inform their local development plan policies. The HNDA2 carried out by SESplan remains the most up to date assessment of future housing need and demand for City of Edinburgh over this period. Following the rejection of the proposed SDP2 by Scottish Ministers, there are no approved housing supply targets for Edinburgh for the entire period of City Plan 2030 (2019-2032). Notwithstanding this, it is understood that the local planning authority are to use the updated Housing Need and Demand Assessment (HNDA2) prepared for the withdrawn SDP2 to determine how much of the remaining regional housing supply target should be met within Edinburgh. The Choices Plan 2030 indicates that the local planning authority have committed to the delivery of 20,000 social and affordable homes by 2027, which requires a significant increase on historical rates (currently delivery of affordable housing is around 900 units per annum). It is clear that there is a high demand for housing of all tenures in the Edinburgh region. In response, the local planning authority are encouraged to provide a positive approach to deliver the required housing types and tenures. The Housing Study focuses on the need to deliver more Build to Rent housing developments. Scottish Planning Policy sets out the need to identify a generous supply of land within the plan area. Within this context, the housing land requirement across all tenures for different groups in the community should be assessed and reflected in planning policies. The landholding to the north of Ratho has the capacity to deliver a housing-led development providing a varied housing tenure choices which respond to local requirements and provides future residents with good connections to existing community facilities and local transport networks.

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Choice 12 A

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

Short Response Option 3 (Blended)

Explanation Heaton would support the in principle blended approach to the delivery of new houses on greenfield sites with minimal reliance on Green Belt release (Option 3). As the Housing Study recognises, this approach would ensure the City of Edinburgh Council can meet its housing need in full. It also allows for the benefits of new development to be accrued by existing communities and support the viability and vitality of their existing services and facilities. Option 3 provides an urban focus and essential growth in key villages which promotes a more dispersed approach to housing delivery around Edinburgh and allows to deliver growth with minimal Green Belt release and in turn managing the boundaries of settlements over the long term and directing growth to the right locations. Furthermore, in adopting a pattern of dispersed growth approach would allow for a number of development sites across the region to come forward at the same time, which is preferable to saturation of the market in a single area (i.e. Option 1). The promotion land to the north of Ratho is a suitable location to accommodate a residential led development supported by other leisure and community uses. The site should be considered as part of the wider allocations for the West Edinburgh area of search. The delivery of the Ratho site is important for the long-term vision of the village and direct growth can be achieved in a manner that is sensitive to the character and scale of the area. The delivery of the site will protect other key Green Belt areas and deliver a number of community benefits in the short and longer terms.

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

Customer Ref: Response Ref:

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Response Type

On behalf of:

Supporting Info

Email

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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Email

Response Type

On behalf of:

Choice **12 B5**

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

Short Response

Explanation

Choice **12 B6**

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

Short Response

Explanation

Choice **12 B7**

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

Short Response

Explanation

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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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Email

Response Type

On behalf of:

Choice **12 BX**

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

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

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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 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

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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 The current Local Development plan provides an overview of the West Edinburgh areas which focuses on land along the A8 corridor, the new tram route towards Newbridge, a number of major existing uses such as the Airport, Royal Highland Centre, Gyle and Hermiston Gait shopping centres and a range of employment/investment locations. It is clear that the committed public transport proposal in the new tram route will greatly enhance the accessibility between the West Edinburgh area, the city centre and surrounding suburban areas. It is anticipated that the new tram route would provide this link in early 2023. The area of search includes our client’s land at Ratho along with other notable nearby uses, locations and opportunities including the “Edinburgh International ClimbingArena”, “Wavegarden Scotland” and the “Union Canal”. It provides for a wide consideration of future uses within the area of search which may be informed by the forthcoming West Edinburgh Study. The forthcoming West Edinburgh study is expected to act as framework for a Masterplan which covers, amongst other things, the Garden District Plan for thousands of new homes and other major housing proposals in the region. However, there is no known planned timetable for the forthcoming West Edinburgh study and the emerging 2030 Choices Plan is anticipated to be adopted in early 2022. It is therefore vital to ensure that there is sufficient flexibility within the City Plan to reflect and balance the outcome of further work with creative options for realising opportunities for sustainable housing, leisure / tourism or economic development such as that contained within Tarmac’s vision.

Choice 14 B

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

Short Response

Explanation

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Choice 14 C

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

Short Response

Explanation

Choice 15 A

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

Short Response

Explanation

Choice 15 B

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

Short Response

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Choice **15 C**

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

Short Response

Explanation

Choice **15 D**

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

Short Response

Explanation

Choice **15 E**

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

Short Response

Explanation

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Choice 15 G

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

Short Response

Explanation

Choice 16 A1

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

Short Response

Explanation

Choice 16 A2

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

Short Response

Explanation

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Choice **16 A3**

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

Short Response

Explanation

Choice **16 A4**

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

Short Response

Explanation

Choice **16 A5**

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

Short Response

Explanation

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Choice **16 A5**

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

Short Response

Explanation

Choice **16 B**

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

Short Response

Explanation

Choice **16 C**

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

Short Response

Explanation

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Choice 16 E1

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

Short Response

Explanation

Choice 16 E2

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

Short Response

Explanation

Choice 16 E3

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

Short Response

Explanation

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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

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Choice 16 E7

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

Short Response

Explanation

Choice 16 E8

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

Short Response

Explanation

Choice 16 EX

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

Short Response

Explanation

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On behalf of:

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:

00311

Response Ref:

ANON-KU2U-GWEP-T

Supporting Info

Name

Christopher Lindley

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Response Type

Agent / Consultant

On behalf of:

Tarmac Trading Limited

Realising Ratho's potential as a sustainable, connected settlement, contributing to Edinburgh West's community aspirations and enhancing its leisure / tourism offering, as an international hub and Canal Destination



Land at Ratho, Edinburgh West - VISION DOCUMENT

ref. TAR-100-C.R.001

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1.0 Introduction.

This document has been prepared by Heaton, on behalf of Tarmac Trading Limited, to outline a **future vision** for Ratho and an opportunity through strategic development, to enable the sustainable growth of the village for its communities, and to further its active contribution to Edinburgh West, the City of Edinburgh and Scotland as a national / international destination - enhancing its overall offering and appeal.

Tarmac's national landholding includes land to the north of Ratho, adjoining the existing settlement boundary at the Baird Road, Freeland Road junction. The landholding subject to these representations extends to some 19.5 Ha of mixed agricultural land and woodland, although Tarmac do own additional land in the area. Tarmac, through this submission and in response to the City Plan 2030, wish to promote their landholding for inclusion within the emerging Local Development Plan.

Based upon the existing evidence base, including information provided as part of the draft City Plan 2030, along with site survey works relating to strategic land analysis, landscape character and visual amenity, land is highlighted within this document in support of its potential for the considered growth of Ratho. The representation area having the potential to deliver high quality, inclusive residential development, formal and informal public access, infrastructure and amenity enhancements, along with the extension of the developing leisure / tourism hub to the west and the enhancement of Ratho as a Canal Destination and primary site along the Union Canal.

In addition the above, in response to the emerging City Plan 2030, information relating to the Choices for City Plan 2030 are provided in Section 6.0, with responses to questions relating to: (Choice 2) Improving the Quality, Density and Accessibility of Development, (Choice 11) Delivering More Affordable Homes, (Choice 12) Building our new Homes and Infrastructure, and (Choice 14) Delivering West Edinburgh.

Our representations follow a previous Tarmac submission to The City of Edinburgh Council Main Issues Report consultation in October 2011.

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Pg 1.

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2.0 The Site and its Surroundings

The land holding in question is situated to the north of Ratho between the Union Canal towpath and the M8 motorway corridor., the extent of which is illustrated below. Further to site survey works, the representation area has identified three distinctive parcels (Parcels A, B and C), with land wider land providing a protective landscape framework and enhancement opportunity.

Parcel A extends to some 9.7 Ha of agricultural land and adjoins the northern boundary of the Ratho Conservation Area. The parcel is bounded by a mature wooded ridge to the south and south west, the M8/M9 slip road and motorway corridor to the north along with mature roadside woodland/tree planting, a former cement works to the north east, and Baird Road to the east and south east. Beyond Baird Road, the recently completed Cala Homes 'The Mooring' development adjoins the Union Canal and the wider Ratho settlement.

Parcel B extends to some 3.0 Ha of agricultural land and is bounded by the International Climbing Arena directly to the west, mature woodland to the south, the M8/M9 slip road and associated mature boundary woodland / tree planting to the north, and the recently constructed, large-scale Arbor Lodge (residential dwelling) to the east.

Parcel C extends to some 3.0 Ha of agricultural land which adjoins the western boundary of the Ratho Conservation Area, east of Arbor Lodge.

With respect to community services, the site is served by the number 20 bus, providing frequent public transport opportunities to Edinburgh. The nearest rail station is Edinburgh Park, located approximately 7km to the east. Edinburgh Park station provides links to Edinburgh city throughout the wider region. Edinburgh International Airport is located some 2.25km to the north east, and the M8/M9 motorways about the northern boundaries of the representation area, enabling ease of access across Scotland and beyond.

Ratho's historic core lies adjacent to, and south of the Union Canal corridor, which forms the heart of the village and provides access to its services and facilities, with subsequent growth extending westwards. In more recent years, a number of new housing developments have extended the built extent of Ratho, utilising land to the north east and to the south west of the established settlement, including the Cala Homes 'The Mooring' development which forms a north eastern urban extension, on land between the Union Canal and Freelands Road, and the Cala Homes 'Craig Park' development, which forms a western extension to the village.

On the adjacent image, the existing residential core of Ratho including recent development to the east and south west is outlined in a black dashed line whilst leisure development including the Edinburgh International Climbing Arena and Wavegarden Scotland located to the west of Ratho is outlined with a red dashed line.



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3.0 Planning Policy Context.

Scottish Planning Policy (SPP) is Scottish Government policy on how nationally important land use planning matters should be addressed across the country. The National Planning Framework (NPF3, 2014) is a long-term strategy for Scotland.

NPF3 is structured around four key themes:

- *A successful, sustainable place: This theme is underpinned by the objective of achieving “a growing low carbon economy” alongside creating “high quality, vibrant and sustainable places...”. NPF3 acknowledges that housebuilding has reduced in recent years due to economic conditions and calls for “a significant increase in house building to ensure housing requirements are met across the country” (Paragraph 2.5). At NPF3 argues for a place-based approach to development (Paragraph 2.8), whilst the importance of adopting a flexible planning approach to ensure the delivery of housing which responds to local requirements is recognised (Paragraph 2.10). NPF3 identifies an overall need “to ensure a generous supply of housing land in sustainable places where people want to live, providing enough homes and supporting economic growth”(Paragraph 2.18).*
- *A low carbon place: This theme relates to the legally binding target of reducing Scotland’s greenhouse gas emissions by 80% by 2050 compared with 1990 levels, asset out in the Climate Change (Scotland) Act 2009.*
- *A natural, resilient place: This theme is concerned with environmental protection and the sustainable use of Scotland’s natural resources. It is noted that Scotland’s principal asset is the land, which must be managed sustainably as both an economic and dynamic resource and an environmental asset.*
- *A connected place: This theme is orientated around maximising physical and digital connectivity around Scotland and between Scotland and the rest of the world.*

In relation to housing development in Edinburgh, NPF3 notes that SESplan area is projected to experience a 20% increase in population and 32% increase in households between 2010 and 2035. To accommodate this “significant growth” the Scottish Government “wish to see greater and more concerted effort to deliver a generous supply of housing land” across SESplan area (Page13). Similar population statistics are provided within the latest Housing Study for the City of Edinburgh, with an estimated population growth of 22% and an 18% increase in households; noting Edinburgh has smaller households than the Scottish average.

Similar population statistics are provided within the latest Housing Study for the City Plan 2030 for the city of Edinburgh, with an estimated population growth of 22% and an 18% increase in households; noting Edinburgh has smaller households than the Scottish average. In response to the expected population growth, the City Plan 2030 sets out a target to deliver 22,600 market dwellings and 20,800 affordable units between the plan period of 2019 to 2032.

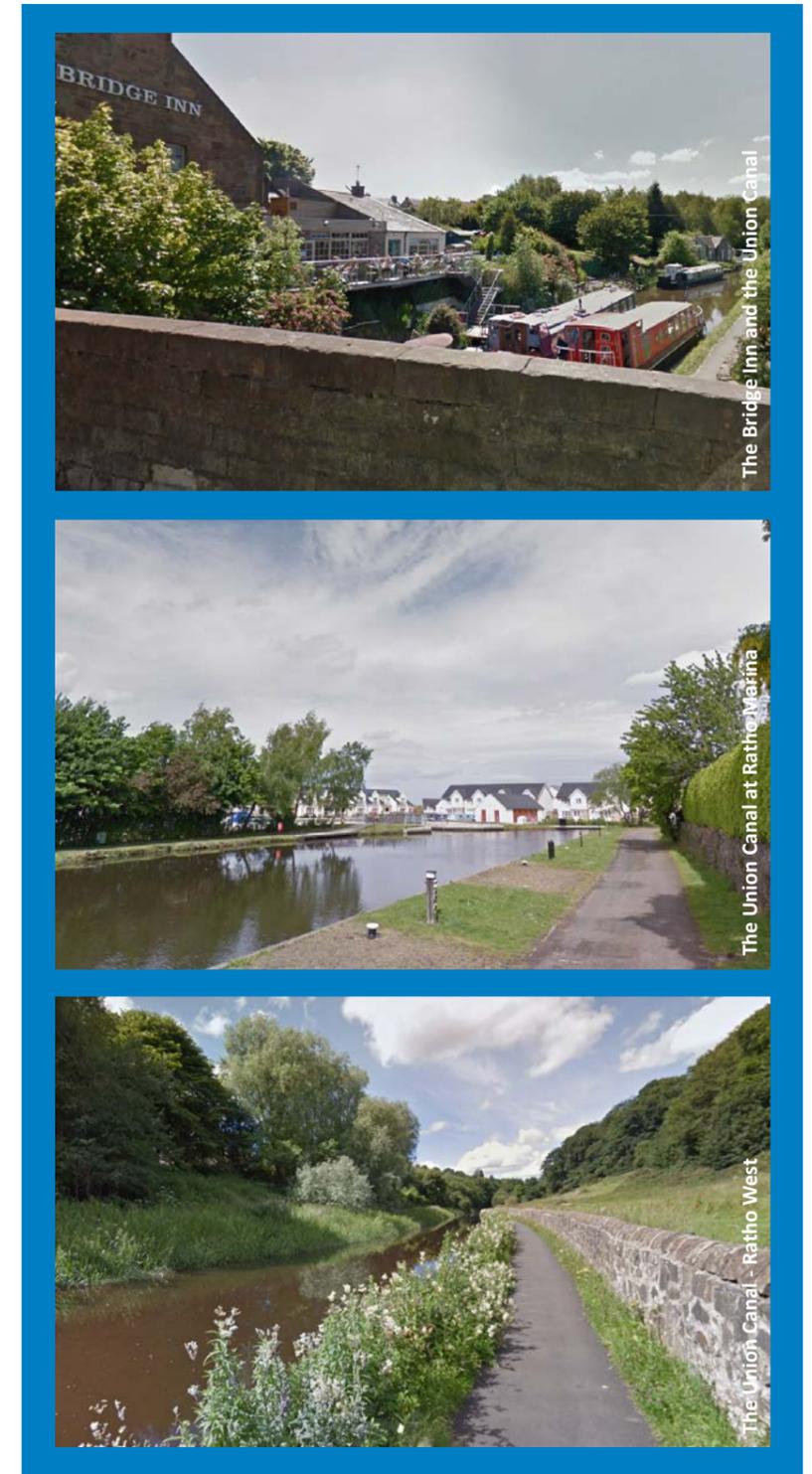
A total housing land supply of 47,000 units is identified, comprising either brownfield land, land with planning permission or land allocation in the previous local development plan. However, some of this land is already consented to deliver wholly market housing, not affordable properties. Therefore, for the local planning authorities to reach its ambitious target of 20,000 affordable homes in the next ten years, significantly more land will be required across the communities within the Council’s administrative area.

Scottish Planning Policy (2014)

The Scottish Planning Policy (2014) is a non-statutory document which sets out national planning policies which reflect Government priorities for operation of the planning system and for the development and use of land.

Under Section 3D of the Town and Country Planning (Scotland) 1997 Act, Ministers are able to issue guidance which planning authorities must have regard with the objective of contributing to sustainable development.

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Planning Policy Context cont...

The SPP notes that the local planning authorities should identify a generous supply of land for each housing market area within the plan area to support the achievement of the housing land requirement across all tenures.

SPP sets out four planning outcomes to explain how planning should support the vision of the planning system to achieve a successful, sustainable place (1); a low carbon place (2); a natural, resilient place (3); and a more connected place (4).

Paragraph 50 states that planning authorities should identify the most sustainable locations for longer-term development and, where necessary, review the boundaries of any green belt.

Paragraph 117 confirms that housing land requirement can be met most notably from committed sites, sites with planning permission, proposed new land allocations and in some cases a proportion of windfall sites. Any assessment of the expected contribution to the housing land requirement from windfall sites must be realistic.

Paragraph 122 notes the need for local development plans to allocate appropriate sites to “support the creation of sustainable mixed communities and successful places” and help the continued delivery of new housing.

Paragraph 129 requires local development plans to identify any expected developer contributions towards the delivery of affordable housing, and this should generally be for a specific proportion of the land within a development site. Planning authorities should consider the level of affordable housing contribution which is likely to be deliverable in the current economic climate, as part of a viable housing development.

SESPlan Strategic Development Plan (June 2013)

The City of Edinburgh, East Lothian, Fife, Midlothian, Scottish Borders and West Lothian Councils, are the six member authorities of SESplan and are required to prepare the Strategic Development Plan for the South East of Scotland.

The SESPlan sets clear parameters for Local Development Plans, giving a broad vision for the future of development in the wider plan area. The Strategic Development Planning Authority are responsible for the review of the SESPlan.

The revised SESPlan 2 was submitted for Examination in June 2017. On 16 May 2019 the South East Scotland Strategic Development Plan (SESplan 2) was rejected by Scottish Ministers on the basis that strategic transport infrastructure issues were not properly considered.

The Planning (Scotland) Act 2019 received Royal Assent in July 2019. The new Act removes requirements to prepare strategic development plans and requires the preparation of Regional Spatial Strategies. It is recognised that SDP1 will be considered out of date before the new legislation comes fully into force.

Edinburgh Local Development Plan (LDP, 2016)

The Local Development Plan was adopted in 2016 and replaced the Edinburgh City Local Plan and Rural West Edinburgh Local Plan. The LDP sets out policies and proposals relating to the development and use of land in the Edinburgh area.

The Proposals Map indicates that the wider site the subject of these representations lies within the Open Countryside (Policy Env10). Land Parcels B and C fall within the

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Planning Policy Context cont...

Ratho Hills Special Landscape Area (Policy Env11) and are bound by a Local Nature Conservation Site (Policy Env15) to the south of the site.

Adopted Env 10 Development in the Green Belt and Countryside states that within the Green Belt and Countryside shown on the Proposals Map, development will only be permitted where it would not detract from the landscape quality and/or rural character of the area and comprises development for the purposes of agriculture; for the change of use of an existing building; for development relating to existing buildings (such as extension); and/or, for the replacement of an existing building.

Adopted Policy Env 11 Special Landscape Areas confirms that planning permission will not be granted for development which would have a significant adverse impact on the special character or qualities of the identified Special Landscape Areas.

Adopted Policy Env15 Site of Local Importance confirms that development likely to have an adverse impact on the flora, fauna, landscape or geological features of a Local Nature Reserve or a Local Nature Conservation Site will not be permitted unless it can be demonstrated that: a) the reasons for allowing the development are sufficient to outweigh the nature conservation interest of the site; b) the adverse consequences of allowing the development for the value of the site have been minimised and mitigated in an acceptable manner. Whilst the landholding falls outside of the Local Nature Conservation Site, any future planning application is expected to be supported by the appropriate level of ecological assessments to ensure that any adverse effects are mitigated, and the development proposal remains policy compliant.

An extract of the adopted Proposals Map is included opposite to illustrate the relationship between the site and abovementioned policies.

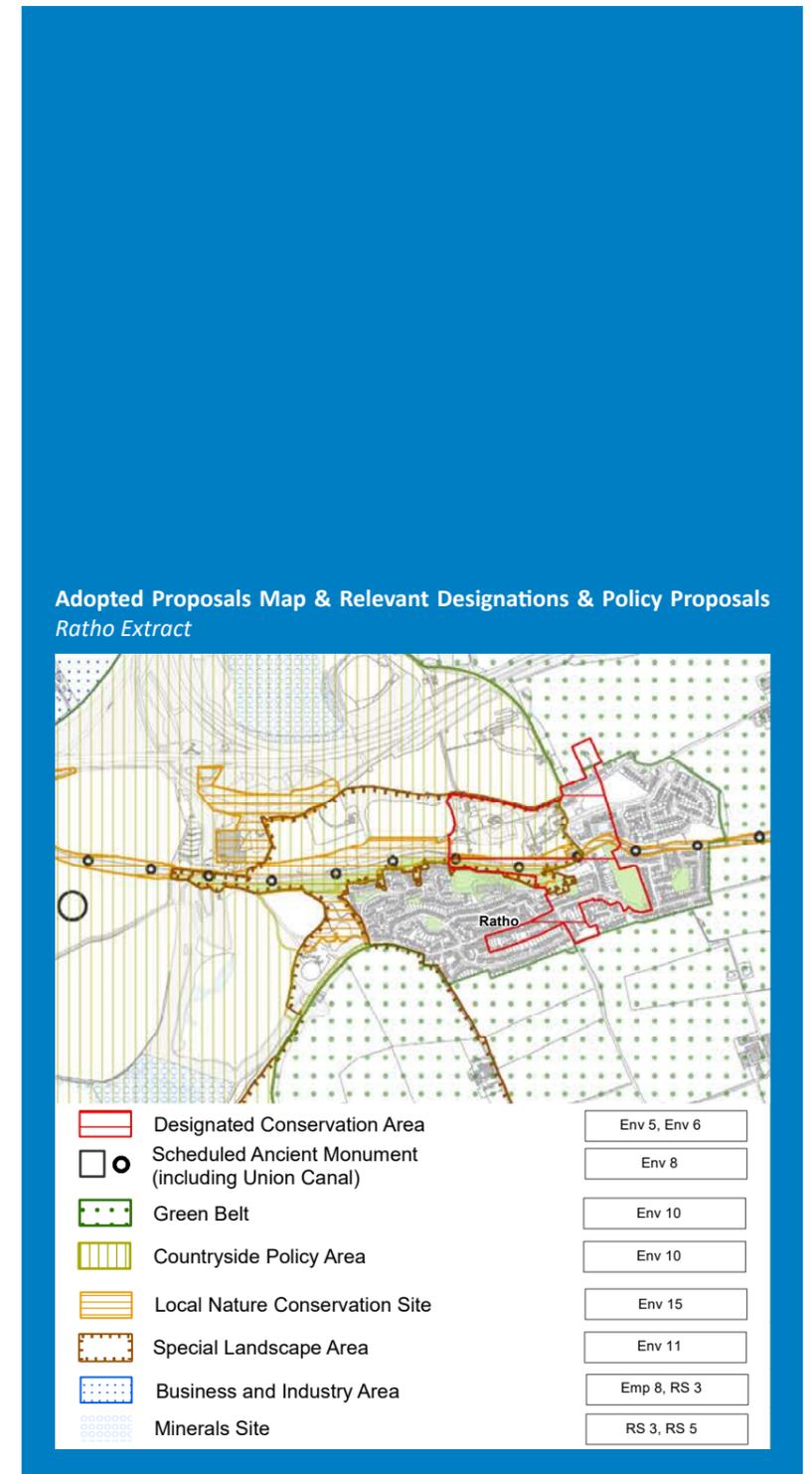
Landscape, Ecological & Heritage Context / Influences

In addition to the above Policy Context, the following has been identified as having the ability to influence the form and extent of potential development and the capacity that the landscape has to take on meaningful change.

- The Ratho Conservation Area and its setting, located to the south of the representation area
- The Ratho Hills Special Landscape Area and its special characteristics, both landscape and visual
- Ratho Quarry Local Nature Conservation Site which lies to the west of the representation area.
- The Union Canal and Craigpark Quarry Enclosure Scheduled Ancient Monuments (SAMs)
- Listed Buildings located within close proximity to the representation area including Ratho Hall and its wider cartilage, St Mary's Church, Baird Road War Memorial and wider residential properties.

It is considered that through quality new development and a landscape and heritage led masterplan approach, that these influences could be absorbed and enhanced to strengthen the intrinsic setting of the settlement, creating a strong, integrated sense of place.

Further assessments would be undertaken and delivered to provide protective frameworks and enhancement opportunities, along with opportunities for increased access understanding and awareness.



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4.0 Opportunities for Sustainable Growth within Ratho

Harnessing the existing positive growth that Ratho has seen in recent years and ensuring its continued economic and social sustainability and community investment by:

- **Enhancing Ratho as a connected Canal Destination and key site along the Union Canal**

...aligning growth around the natural assets of Ratho, providing connectivity and opportunities for inward investment

- **Furthering Ratho as a nationally and internationally renowned leisure and activity hub, and tourism destination for Scotland**

...the established Edinburgh International Climbing Arena, alongside the emerging Wavegarden Scotland and associated overnight stay accommodation present a clear opportunity to capture, direct and further this growth for the benefit of Ratho village as a destination, in line with its ambitions as a Canal Destination. Allowing investment to be retained and re-invested for the benefit of Ratho people.

- **Providing jobs for local people**

...providing a range of skilled and un-skilled 'rural' employment opportunities.

- **Delivering quality, locally distinct homes which support the need for inclusivity and affordable houses**

...there is an identified need for mixed new housing locally, including affordable.

- **Ensuring the benefits are gained for the village and its existing communities**

...capturing peripheral growth and securing it for the benefit of the village and subsequent internal investments

- **Enhancing the setting, connectivity and provision of Ratho**

...focussing on landscape led solutions to ensure those special characteristics are identified and protected, and the wider setting and vernacular respected and enhanced

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5.0 Proposed Promotion Area (Parcels A, B and C)

The following information illustrates the strategic potential of land to the north of the Ratho, north of the Union Canal, to support the sustainable growth of the village for the benefit of its communities and the wider region as a destination for heritage and activity based tourism for Scotland.

The drawing overleaf illustrates the extent of the representation area within the context of Ratho village, its conservation core, the Union Canal and key local landmarks, along with the existing and emerging activity based tourism to the western edge of the settlement. The drawing also illustrates the extent of each Parcel within the representation area, proposed for development, with the wider area being supported for access and, mitigation and enhancements as a strengthened landscape framework and as visual containment.



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Land to the North of Ratho Village - Proposed Representation Areas and Parcels A, B & C



The illustrative plan opposite outlines the existing built extent of Ratho Village, its central Conservation Area designation and existing and emerging leisure / tourism destinations, within the context of the Tarmac landholding to the north of the village.

Based upon the individual spatial characteristics of the land holding and the strategic land use potential of each, the total promotion area has been broken down into three interconnected parcels. These are as follows:

PARCEL A: 9.7 Hectares
Land to the North of Ratho Hall
 Residential & Associated Public Open Space, Access & Amenity

Generally contained landscape and visual setting with opportunities to enhance landscape character and provide meaningful public open space and mitigation- adjoining the northern limits of Ratho village at Bairds Road.

PARCEL B: 3.0 Hectares
Land to the East of the International Climbing Arena
 Leisure, Tourism & Recreation - including accommodation

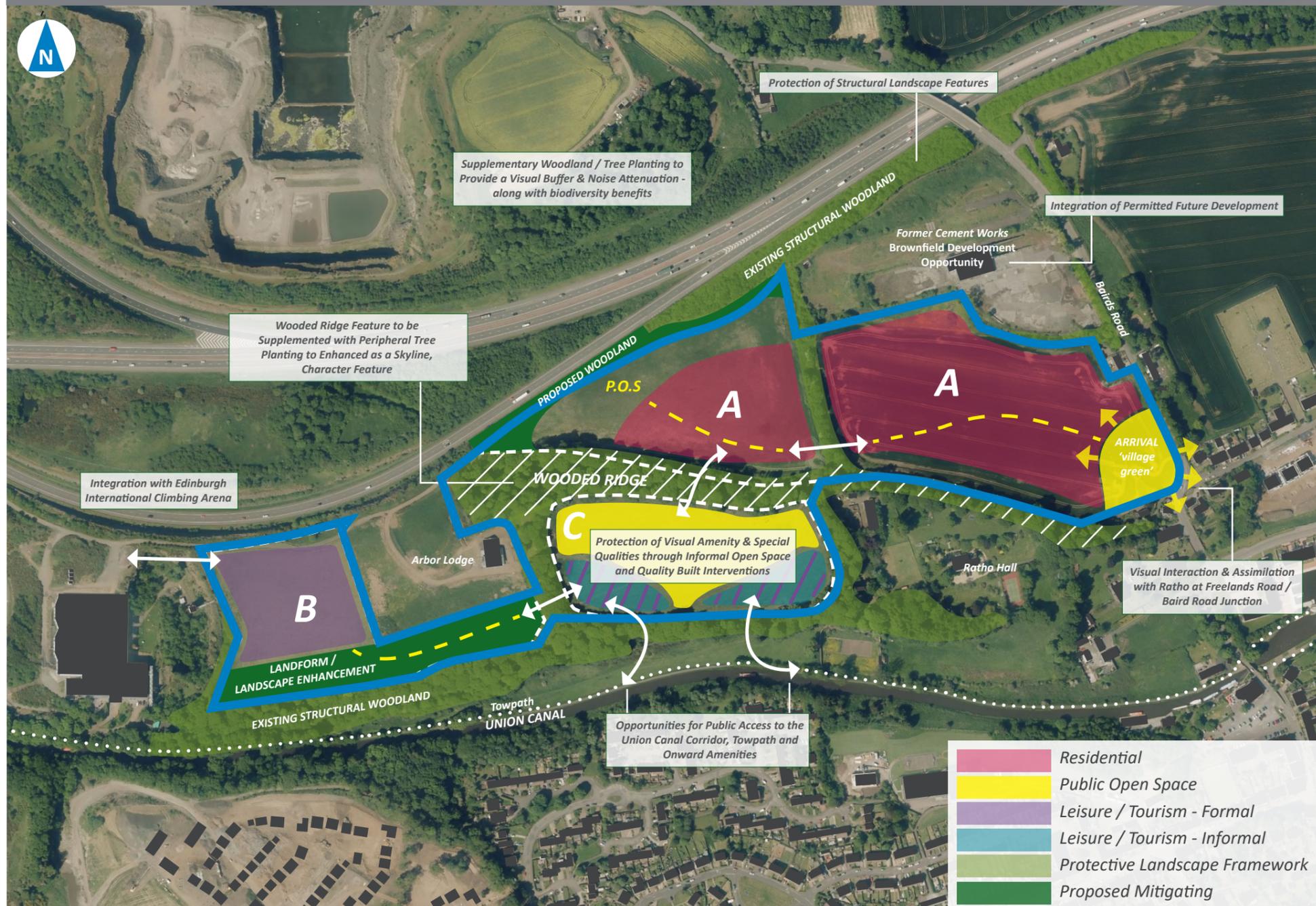
Contained agricultural parcel adjoining and sharing access with the Edinburgh International Climbing Arena. Opportunities to provide public access linking into the Union Canal corridor and wider public access network, providing onward links between Ratho village and these existing recreation/tourism destinations (including emerging Wavegarden Scotland).

PARCEL C: 3.0 Hectares
Land to the North of the Union Canal, West of Ratho
 Informal Leisure, Tourism (including accommodation & Recreation - Union 'Canal Park')

Opportunities to enhance Ratho as a canal destination through the provision of informal public access and amenity provision, linking into the Union Canal corridor.

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Strategic Capacity to take on Change - Integrated with Potential Future Development



The illustrative plan opposite illustrates the landscape frameworks of the representation area which would be protected and enhanced, within which the three parcels lie.

The following parameters are proposed for each parcel, to ensure that quality development can be accommodated without detriment to landscape character and visual amenity and respecting the heritage value of Ratho.

PARCEL A: 9.7 Hectares
 250 to 300 dwellings based upon a mixed density approach of 25 units / ha to 35 units / ha

- Strengthened landscape margins
- hierarchy of built density from 'village green' typology (2 to 3 storey) to lower density village margins (1.5 to 2 storey) to the north west
- 'village green' upon arrival with internal green infrastructure corridor to north western POS
- access to wider parcels

PARCEL B: 3.0 Hectares
 Leisure, Tourism & Recreation - including accommodation
 2Ha developable space

- Strengthened landscape margins and ecological enhancement
- landform manipulation and mitigation to enable built form to sit down beyond a perceived landscape ridge
- built form to primarily utilise the west of the site with lower density 'accommodation' to the eastern limits
- access to wider parcels

PARCEL C: 3.0 Hectares
 1Ha developable space
 Informal Leisure, Tourism (inc. accommodation) & Recreation - Union 'Canal Park'

- Strengthened landscape margins
- Small scale, quality built form (1 storey) to the southern slope edges, screening by existing mature woodland restricting intervisibility

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5.0 Proposed Promotion Area (Parcels A, B and C)

The drawings on page 8 and 9 illustrate the proposed promotion area within the context of the existing settlement, which for reasons of strategic development and spatial characteristics, has been further refined into three distinct parcels. The following information outlines the extent, character and influences of each, and their potential to support Ratho and the wider region:

Parcel A - Land to the North of Ratho Hall

Promoted as a Quality Residential Extension to Ratho

Parcel A extends to some 9.7 Ha of agricultural land. The Parcel adjoins the northern boundary of the Ratho Conservation Area, where a wooded ridge provides visual separation. The wooded ridge forms the southern and south western boundary of the parcel, with further woodland to the west, the M8/M9 slip road and motorway corridor to the north, along with mature roadside woodland/tree planting, a former cement works to the north east, and Baird Road to the eastern and south eastern boundaries. Beyond Baird Road, is Freeland Road where the recently completed Cala Homes 'The Mooring' development adjoins moves southwards to meet the Union Canal and the wider the Ratho settlement.

The parcel, while adjoining the visually developed edge of Ratho at the intersection between Baird Road and Freeland Road, is visually separated from the Union Canal corridor, its banks and those properties located along it, along with the historic core of the village. This wooded ridge forms a prominent, elevated skyline feature and restricts intervisibility, providing a contained landscape unit. Due to the extent and nature of Parcel A, should it be developed, this feature would continue to from the visual skyline and backdrop within views from the locality, maintaining the enclosure formed by the steep wooded valley sides of the Union Canal corridor. Ratho Hall lies to the south of the parcel, south of the wooded ridge.

It is considered that through a landscape led masterplan approach, a defined density and associated green infrastructure provision, that sensitive residential development can be accommodated and absorbed within the Parcel A without detriment to local landscape character or visual amenity. Clear opportunities exist for in-built mitigation to further contain the parcel, while creating continuous landscape features / vegetative corridors with associated biodiversity benefits.

The entirety of Parcel A falls within the Edinburgh Landscape Character Assessment, Landscape Character Area (LCA) 22 'Ratho Farmlands'. This area of the LCA has subsequently been identified within the Edinburgh City Plan 2030: Landscape and Visual Assessment of Greenfield Sites (April 2019) as being located within Council Assessment Area 7 'Arbor Lodge' (part). This study, which breaks larger character areas into more focussed parcels, notes that while there is little scope for residential development to the south of the steep sided wooded ridge, "...the scarp grades more gently to the north where it is bounded by the M8... An industrial facility is located in a dip close to the motorway. This area lies away from Ratho, which has a strong linear form and association with the Union Canal. While housing on this northern part of CAA7 would be perceptually divorced from Ratho and conflict with the existing settlement form, it would lie physically close to its core. Some dispersed housing is visible on the perimeter of this CAA. This northern part of CAA 7 is visually discrete and the landform, surrounding roads and ridge top woodland would provide firm boundaries. Although some conflicts could occur with settlement pattern, there is some limited scope to accommodate housing on the lower slopes and flatter ground of this part of CAA 7. Woodland should be planted on steeper upper slopes to enhance the ridgeline. Earth bunding and planting along the M8 may also mitigate traffic noise and pollution."

The proposed extent of Parcel A has been refined within the context of the setting of the original core of Ratho, those heritage assets within and adjacent to it (including Ratho Hall), the potential for intervisibility, and associated impacts on visual amenity, utilising the existing landscape and topographic structure to contain the parcel, while retaining direct links and connectivity with the village. The parcel being adjacent to existing mixed residential development to the east (including The Moorings). The parcel, if developed, would not appear as an isolated parcel, with opportunities for strong direct and perceptual links to the settlement, both via the Baird Road boundary, and via land to the south east of the Parcel (see Parcels B and C). The former cement works affords planning permission for the development of a care facility. Further

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5.0 Proposed Promotion Area (Parcels A, B and C) continued...

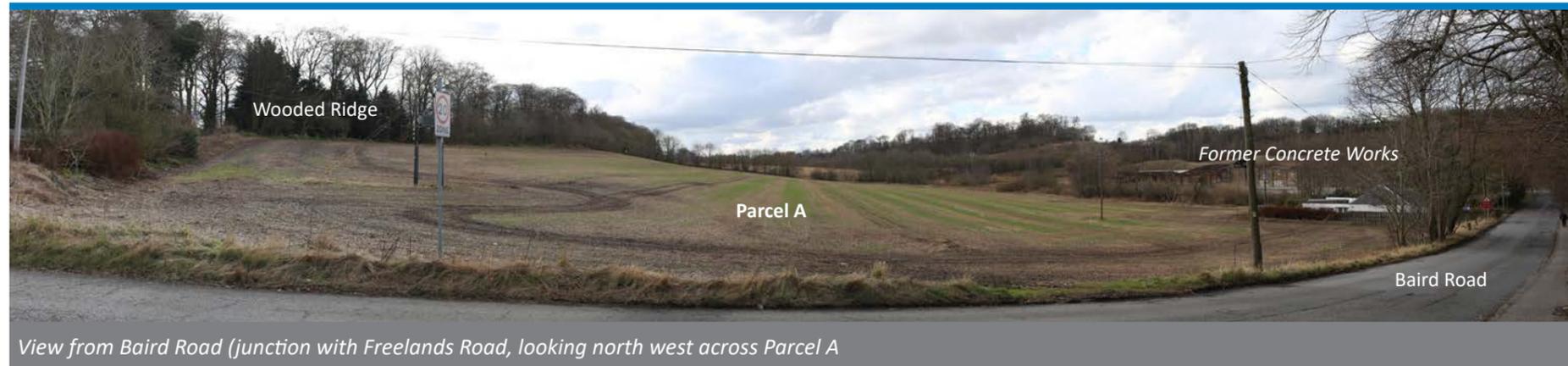
opportunities exist to enhance and interact with this potential development to ensure it is able to compliment and support the settlement.

With respect to density, opportunities exist to provide a hierarchical structure to ensure the character and form of the settlement and this edge of village location, can be reflected and respected, while actively contributing the requirement for new homes. Similarly, due to the spatial extent of the parcel along with the vernacular of the existing Ratho settlement, supporting the delivery of a range of dwelling types, including supporting the need for affordable housing.

Building upon the existing strong green boundaries, opportunities exist through development of the parcel, for an enhanced Green Infrastructure, both internally through the integration of meaningful public open space, and in the creation of further links in to the local and wider public access network, including the Union Canal corridor.

Green infrastructure to strengthen and extend that of the existing Ratho settlement area, providing opportunities for further informal leisure and recreation.

Development of such a Site would facilitate the improvements of infrastructure locally, including the provision of potential infrastructure improvements (i.e. highways at the 'piggery bend' and biodiversity offsets) within the wider Tarmac landholding..



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5.0 Proposed Promotion Area (Parcels A, B and C) continued...

Parcel B - Land to the East of the Edinburgh International Climbing Arena

Promoted for Commercial Uses : Leisure, Tourism (including Accommodation) & Recreation

Parcel B extends to some 3.0Ha of agricultural land. The parcel is bounded by the International Climbing Arena, located directly to the west, mature woodland to the south, the M8/M9 slip road and associated mature boundary woodland / tree planting to the north, and the recently constructed, large-scale Arbor Lodge (residential dwelling) to the east, along with its residential cartilage. Land levels fall from north to south, before land (outside of the Parcel) falls more steeply to the Union Canal. These slopes being primarily wooded with areas of valley-side pasture.

While some intervisibility exists between the village and Parcel B, the parcel is primarily contained and sits within the context / close proximity of both large scale commercial (leisure, tourism and recreation) and residential (Arbor Lodge) built form, with wider commercial development (leisure, tourism and recreation) being constructed on land to the south west. Wavegarden Scotland is currently under development / construction, occupying a large area of land to the west of Ratho, west of Craig Park. This development being complimentary to the offering of the long-established International Climbing Arena to the north (adjacent to Parcel B), strengthening the locations merits and standing as a national / international leisure/recreation hub- utilising direct links to the M8 and M9 motorway networks, Edinburgh International Airport and its proximity to both Edinburgh and Glasgow. The enhanced offering establishing the location as a key destination, with the Wavegarden proposals incorporating tourist accommodation, highlighting opportunities for Ratho and the surrounding areas for longer term stay tourism.

The Parcel is located within the Ratho Hills Special Landscape Area (SLA) to its north western boundary where it abuts the climbing arena. The Parcel forming a small area on the edge of a much larger landscape area. It should be noted that since the designation of the Ratho Hills SLA, an area of new housing has been permitted and constructed at Craig Park. This development utilising a narrow section of designated land linking the Ratho hills themselves within the Union Canal corridor and land north of Ratho beyond. This development in essence splitting the SLA. While the Parcel sits at elevation and a degree of intervisibility is noted as being present, it is considered that through a landscape led approach to development within this parcel, new built form could be accommodated that would not cause visual harm and would be viewed alongside existing built development. Mitigating landscape features to the south could be accommodated to maintain the appearance of a rising slope, with new development set beyond, maintaining the perceived special character of the Ratho Hills.

Development of this parcel would enable the enhancement of the establishing destination, providing a further offering to visitors and having the potential to increase the length of visitor stays within the area. This would result in wider positive benefits to Ratho, its communities, and their resources. It is considered that development could be successfully absorbed.

Parcel B, along with Parcel C, provide opportunities for pedestrian public access to be gained from these international destinations to the Union Canal, which would in turn provide easy access onto the wider access network, into Ratho village itself, and onto the long distance path of the Union Canal (towpath), both east and west.

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5.0 Proposed Promotion Area (Parcels A, B and C) continued...

Parcel C - Land to the North of the Union Canal, West of Ratho Hall

Promoted for Leisure, Tourism (including Accommodation) & Recreation

Parcel C extends to some 3.0 Ha of agricultural land within the Edinburgh Green Belt. The Parcel adjoins the western boundary of the Ratho Conservation Area, east of Arbor Lodge.

It is considered that while intervisibility exists between the historic core of Ratho and Parcel C, its strategic location with respect to the Union Canal and towpath, and the international leisure facilities to the west of Ratho, provide opportunities for the enhancement of this landscape corridor through additional informal leisure / recreation provisions, providing greater levels of access and associated amenity. It is not considered that an intensive use would be appropriate within this location given the interaction between it and the conservation area, along with the setting of Ratho Hall, however opportunities exist for further intervention to enhance Ratho as a canal destination.

Like Parcel A, Parcel C is located within Landscape Character Area (LCA) 22 'Ratho Farmlands', identified within the Edinburgh City Plan 2030: Landscape and Visual Assessment of Greenfield Sites (April 2019) as being located within Council Assessment Area 7 'Arbor Lodge' (part).

Development would enable the delivery of meaningful, supportive public open space, having the potential to strengthen and enhance local landscape character, and the setting of the conservation area, in particular that of Ratho Hall and the Union Canal Scheduled Ancient Monument.

It is considered that the local landscape has the capacity to take on localised change to the south of the parcel, including small scale built form, which could comprise canal side tourist accommodation and visitor centre, with wider land (to the north) providing opportunities to link into and enhance the local public access network, with Parcel B providing the ability to link existing activity based leisure, tourism and recreation sites to the west of Ratho with the Union Canal corridor and Ratho village itself.

The proposals engage with the potential to strengthen the landscape setting and amenity value of Ratho for its immediate communities along with its visitors as a destination, providing a catalyst for growth social and economic growth, supporting the needs of the local community.

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6.0 Choices for City Plan 2030: Responses.

The Choices for City Plan 2030 was issued for consultation forms part of the early engagement in an 8-week consultation from January to March 2020. The Choices for City Plan 2030 documents sets out the Council's preferred options for changes and other alternatives

Heatons have taken the opportunity to review the consultation document and its underlying evidence base and provide a response to the high level questions relevant to the promotion of Tarmac's land north of Ratho for a mix of residential, leisure, recreation and tourism land uses with associated landscaping and infrastructure provision.

Choice 2 – Improving the Quality and Density of Development

Q2.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?

The density of proposed housing development is currently assessed against Policy HOU4 Housing Density of the Edinburgh Development Plan. This policy requires an "appropriate" density having regard to the site's characterises and those of the surrounding areas.

The Edinburgh Local Development Plan 2016 acknowledges the many benefits to higher density development, as such proposals make efficient use of land and encourages the effective provision of public transport. However, this has to be balanced against the local context of a development proposals where higher density is not always appropriate.

Tarmac support the principles of planning policies seeking to make the most efficient use of land. However, given the varied characteristics of the communities within the City's administrative areas a blanket approach to meeting minimum density targets is not appropriate. Seeking a high density of development across the entire plan area may lead forms of development which do not reflect surrounding context leading to no development to support existing communities in rural settings.

In applying a strict approach to gross development densities in the Plan, also provides limited scope for variations in approach to urban design and place making which appropriately reflect their surroundings.

To meet the objective of the emerging LDP, a key ambition for Edinburgh is to "be a sustainable city with the right types and quality of new homes and neighbourhoods, in the right locations, with the right infrastructure."

The use of minimum density targets would be more appropriate for certain parts of the plan area (i.e. main town and city centres). It would be more appropriate to optimise the density of developments in settlements that are well served by public transport. As mentioned previously, Ratho has access to existing public bus routes and a railway station. Geographically, it is also well related to the international Airport.

An appropriate development density for future housing sites outside of the main towns and cities in more rural settings can be achieved through individual site allocations as part of the forthcoming development plan, such as the Tarmac landholding at Ratho This in turn would clearly outline to Applicants the expected yield for individual sites which would be appropriate for its context and availability of infrastructure. Indicative density ranges of between 25 and 30 dwellings per hectare have been applied to residential elements of our proposal with a 70% developable parameter set for the proposed leisure and tourism offer.

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6.0 Choices for City Plan 2030: Responses.

Choice 10 – Ensuring the better use of land

Q10.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?

It is clear to achieve sustainable forms of development, housing proposals should take place in settlements where a reasonable range of employment, services, community facilities, leisure, tourism, recreation and public transport networks exist or can be provided.

The City Plan approach to Q10.C provides an opportunity to optimise the delivery of housing and other appropriate development around “stand alone out of centre retail units and commercial centres”.

Our view is that this could quite easily be expanded to include other existing and developing ‘centres’ for the community and wider area including leisure and tourism uses which are located on the periphery of existing communities which already contain services and facilities. In the case of our client’s landholding, this includes the “Edinburgh International Climbing Arena”, “Wavegarden Scotland” and the “Union Canal”.

The allocation of the land to the north of Ratho, primarily for future housing delivery not only secures a valued contribution to the identified housing requirement but also links to these principles which aid sustainable development in a holistic way.

Choice 11 – Delivering More Affordable Homes.

Q11.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?

The Choices Plan aim to set the policy context in which affordable market housing can be delivered. It is accepted that there is a clear need to deliver more market and affordable homes.

The provisions of affordable housing requirement should be fully assessed against housing need and demand. It is acknowledged that a Housing Need and Demand Assessment has been carried out to support the Proposed Strategic Development Plan 2 (SDP2). However, as mentioned previously, Scottish Ministers decided to reject the plan in May 2019 as the Plan had not been informed by adequate transport evidence.

Notwithstanding this, the SDP2 provides a strong indication of the Council’s housing strategy, and notes that the City of Edinburgh is expected to deliver approximately 45% of the number of homes for the period 2018-2030. Which gives the Choices Plan a target of 22,600 units of market housing and 20,800 affordable homes for a similar period of 2019-2032 (City Plan 2030, Housing Study).

The City Plan 2030 housing evidence base acknowledges a gradual increase in supply of affordable homes in recent years, however, notwithstanding the increase it is still significantly below the level necessary for the council to meet its objective of delivering 20,000 homes by 2027.

The Housing Study indicates an increase from 25% to 35% could be achievable. However, this is based on land values in Edinburgh which will undoubtedly vary across the city and fluctuate over time.

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6.0 Choices for City Plan 2030: Responses.

The Council should be mindful that the cumulative burden of policy requirements and financial contributions are not set too high that the majority of housing sites become undeliverable due to viability, which is encouraged by the SPP. The details of provision, which will reflect housing need and individual site suitability, will be a matter for agreement between the developer and the Council.

Whilst Tarmac would provide support for different forms of affordable housing, a more flexible policy approach is needed. Therefore, it may be more appropriate to vary the affordable housing contributions in high pressured areas, setting out priority locations for the development of affordable housing and specific tenures where a higher percentage of contribution will be required (reflecting the approach implemented by Stirling Council which is acknowledged in the City Plan evidence base). This approach would ensure more affordable housing contributions are secured in areas of most need.

This approach meets the requirements of the NPF3 which aims to facilitate new housing development in areas within our cities network where there is continuing pressure for growth and rural housing provision.

The enclosed Concept Masterplan at Section 5.0 illustrates a clear potential to deliver affordable housing integrated throughout market unit provisions and access to new community and leisure facilities. The site supports housing deliver in an appropriate location and fulfils the council's objectives to meet housing need and create strong, sustainable communities.

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?

The SPP (Paragraph 115) requires local planning authorities to carry out robust Housing Need and Demand Assessments, to inform their local development plan policies. The HNDA2 carried out by SESplan remains the most up to date assessment of future housing need and demand for City of Edinburgh over this period. Following the rejection of the proposed SDP2 by Scottish Ministers, there are no approved housing supply targets for Edinburgh for the entire period of City Plan 2030 (2019-2032).

Notwithstanding this, it is understood that the local planning authority are to use the updated Housing Need and Demand Assessment (HNDA2) prepared for the withdrawn SPD2 to determine how much of the remaining regional housing supply target should be met within Edinburgh.

The Choices Plan 2030 indicates that the local planning authority have committed to the delivery of 20,00 social and affordable homes by 2027, which requires a significant increase on historical rates (currently delivery of affordable housing is around 900 units per annum).

It is clear that there is a high demand for housing of all tenures in the Edinburgh region. In response, the local planning authority are encouraged to provide a positive approach to deliver the required housing types and tenures.

The Housing Study focuses on the need to deliver more Build to Rent housing developments. Scottish Planning Policy sets out the need to identify a generous supply of land within the plan area. Within this context, the housing land requirement across all tenures for different groups in the community should be assessed and reflected in planning policies.

The landholding to the north of Ratho has the capacity to deliver a housing-led development providing a varied housing tenure choices which respond to local requirements and provides future residents with good connections to existing community facilities and local transport networks.

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6.0 Choices for City Plan 2030: Responses.

Choice 12 – Building Our New Homes and Infrastructure

Q12.A – Which option do you support?

Heatons would support the in principle blended approach to the delivery of new houses on greenfield sites with minimal reliance on Green Belt release (Option 3). As the Housing Study recognises, this approach would ensure the City of Edinburgh Council can meet its housing need in full. It also allows for the benefits of new development to be accrued by existing communities and support the viability and vitality of their existing services and facilities.

Option 3 provides an urban focus and essential growth in key villages which promotes a more dispersed approach to housing delivery around Edinburgh and allows to deliver growth with minimal Green Belt release and in turn managing the boundaries of settlements over the long term and directing growth to the right locations.

Furthermore, in adopting a pattern of dispersed growth approach would allow for a number of development sites across the region to come forward at the same time, which is preferable to saturation of the market in a single area (i.e. Option 1).

The promotion land to the north of Ratho is a suitable location to accommodate a residential led development supported by other leisure and community uses. The site should be considered as part of the wider allocations for the West Edinburgh area of search.

The delivery of the Ratho site is important for the long-term vision of the village and direct growth can be achieved in a manner that is sensitive to the character and scale of the area. the deliver of the site will protect other key Green Belt areas and deliver a number of community benefits in the short and longer terms.

Q12.C – Do you have a greenfield site you wish us to be considered in the proposed Plan?

Yes, our client's vision for their site is outlined throughout these representations. Based upon the individual spatial characteristics of the land holding and the strategic land use potential of each, the total promotion area has been broken down into three interconnected parcels. These are described as follows:

PARCEL A: Land to the North of Ratho Hall (9.7 Hectares)

This parcel benefits generally from a contained landscape and visual setting with opportunities to enhance landscape character and provide meaningful public open space and mitigation. It adjoins the northern limits of Ratho village at Bairds Road and is contained to the north by the former Cement Works and the M8 Motorway Corridor.

It provides the opportunity to accommodate residential led development with associated public open space, enhanced public access and amenity. It can accommodate 250 to 300 dwellings based upon a mixed density approach of 25-35 dwellings per hectare and allows for:

- *Strengthened landscape margins;*
- *A Hierarchy of built density from 'village green' typology (2 to 3 storey) to lower density village margins (1.5 to 2 storey) to the north west;*
- *A 'village green' upon arrival with internal green infrastructure corridor to north western Public Open Space; and,*
- *Access to be created and enhanced to wider parcels.*

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6.0 Choices for City Plan 2030: Responses.

PARCEL B: Land to the East of the International Climbing Arena (3.0 Hectares)

This parcel comprises a well contained agricultural parcel adjoining and sharing access with the Edinburgh International Climbing Arena. Opportunities include the provision public access linking into the Union Canal corridor and wider public access network, providing onward links between Ratho village and these existing recreation/ tourism destinations (including emerging Wavegarden Scotland).

It provides the opportunity to accommodate a mix of leisure, tourism & recreation development (including accommodation). Based on a 70% developable land area, approximately 2Ha of development could be provided which allows for:

- *Strengthened landscape margins and ecological enhancement;*
- *Landform manipulation and mitigation to enable built form to sit down beyond a perceived landscape ridge;*
- *Built form to primarily utilise the west of the site with lower density 'accommodation' to the eastern limits; and,*
- *Access to wider parcels.*

PARCEL C: Land to the North of the Union Canal (3.0 Hectares)

This parcel provides the opportunity to deliver informal leisure, tourism (including accommodation) & recreation. Compared to the other parcels, development opportunities are much more limited here and consequently the focus of approximately 1ha of developable area would be linked to the concept of developing a linked Union 'Canal Park' to enhance Ratho as a canal destination through the provision of informal public access and amenity provision.

Choice 14 – Delivering West Edinburgh

Q14.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?

The current Local Development plan provides an overview of the West Edinburgh areas which focuses on land along the A8 corridor, the new tram route towards Newbridge, a number of major existing uses such as the Airport, Royal Highland Centre, Gyle and Hermiston Gait shopping centres and a range of employment/investment locations. It is clear that the committed public transport proposal in the new tram route will greatly enhance the accessibility between the West Edinburgh area, the city centre and surrounding suburban areas. It is anticipated that the new tram route would provide this link in early 2023.

The area of search includes our client's land at Ratho along with other notable nearby uses, locations and opportunities including the "Edinburgh International Climbing Arena", "Wavegarden Scotland" and the "Union Canal". It provides for a wide consideration of future uses within the area of search which may be informed by the forthcoming West Edinburgh Study. The forthcoming West Edinburgh study is expected to act as framework for a Masterplan which covers, amongst other things, the Garden District Plan for thousands of new homes and other major housing proposals in the region. However, there is no known planned timetable for the forthcoming West Edinburgh study and the emerging 2030 Choices Plan is anticipated to be adopted in early 2022.

It is therefore vital to ensure that there is sufficient flexibility within the City Plan to reflect and balance the outcome of further work with creative options for realising opportunities for sustainable housing, leisure / tourism or economic development such as that contained within Tarmac's vision.

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7.0 Summary.

This document has been prepared by Heaton's, on behalf of Tarmac Trading Limited, to outline a future vision for Ratho and an opportunity through strategic development, to enable the sustainable growth of the village for its communities, and to further its active contribution to Edinburgh West, the City of Edinburgh and Scotland as a national / international destination- enhancing its overall offering and appeal.

Tarmac's national landholding includes land to the north of Ratho, adjoining the existing settlement boundary at the Bairds Road, Freeland's Road junction. The landholding subject to these representations extends to some 19.5 Ha of mixed agricultural land and woodland, although Tarmac do own additional land in the area (Hillwood Quarry) which could be used for the provision of infrastructure (i.e. local highway improvements and biodiversity enhancement). Tarmac, through this submission and in response to the City Plan 2030, wish promote their landholding for inclusion within the emerging Local Development Plan.

Based upon the existing evidence base, including information provided as part of the draft City Plan 2030, along with site survey works relating to strategic land analysis, landscape character and visual amenity, land is highlighted within this document in support of its potential for the considered growth of Ratho. The representation area having the potential to deliver high quality, inclusive residential development, formal and informal public access, infrastructure and amenity enhancements, along with the extension of the developing leisure / tourism hub to the west and the enhancement of Ratho as a Canal Destination and primary site along the Union Canal.

In addition the above, in response to the emerging City Plan 2030, information relating to the Choices for City Plan 2030 are provided in Section 6.0, with responses to questions relating to:

- **(Choice 2) Improving the Quality, Density and Accessibility of Development;**
 - o Where we emphasise the importance of tailoring density requirements to local context to ensure properly designed places are delivered which provide sustainable development to support and enhance existing communities
- **(Choice 10) Ensuring the Better Use of Land;**
 - o To deliver patterns of development and mixes of uses that positively respond to surrounding land uses such as those adjoining and within Ratho
- **(Choice 11) Delivering More Affordable Homes,**
 - o To ensure that sufficient affordable housing of the right type and tenure is provided as reflecting Tarmac's support for this.
- **(Choice 12) Building our new Homes and Infrastructure; and**
 - o Where we emphasise the need to balance appropriate development across the plan area, support existing communities and offer enhancements to the services and facilities they enjoy.
 - o The response to this Tarmac's vision for their landholding, including residential development, formal and informal public access, infrastructure and amenity enhancements, along with the extension of the developing leisure / tourism hub to the west and the enhancement of Ratho as a Canal Destination and primary site along the Union Canal
- **(Choice 14) Delivering West Edinburgh.**
 - o Where we emphasise the importance of ensuring that there is sufficient flexibility within the City Plan to reflect and balance the outcome of the West Edinburgh Study to deliver creative options for realising opportunities for sustainable housing, leisure / tourism or economic development such as that contained within Tarmac's vision.

We trust that this submission is of use in further refining the City Plan 2030. We look forward to further discussions and constructive work in the future.

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