

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 1 A

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

Short Response

**Explanation** Taylor Wimpey (TW) support this ambition, however, the question is too vague and lacking in detail. We agree that there will be an important role for new development to play in connecting to and assisting the delivery of this new network. However, the network will be used by a wide variety of users and it would not be reasonable to expect new development to deliver this network in its entirety. The land necessary for such a network will be in many different ownerships.

Choice 1 B

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

Short Response

**Explanation** No. While in principle we support the providing of green and blue infrastructure, not enough information is provided here to understand what is proposed. More specific details will be essential to understanding the policy which is envisaged. There are also possible tensions with this priority and others such as building at greater density and encouraging brownfield development. We consider that the following matters will be important to consider when drafting any policy on this: 1. We have experienced issues where Local Authority requests and Scottish Water's vesting requirements do not align, particularly with regard to the level of surface water storage. Given the requirement at question 1H for green spaces to have management arrangements in place, it will be essential that any policy asks are aligned with Scottish Water's vesting requirements. 2. Green and blue infrastructure can be difficult to deliver on smaller and brownfield sites. 3. Green and blue infrastructure can take up lot of space, this is one challenge in delivering the density aspirations if these are to be calculated using gross area.

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

Supporting Info

Email

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

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

Supporting Info

Email

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** No. We don't object to larger areas in principle but there is inadequate detail on how this might be used. It is also unclear how this would be made compatible with the desire to have increased densities and measure these by gross area. We would like to understand how the Council intends to balance these two priorities. It will also be necessary to consider the relative benefits of this approach and the longer walks it may require for some residents compared with providing a series of smaller spaces which may be more quickly accessed. Quality of open space provided will also be a consideration. We would be keen to work with the Council on how appropriate open space could be provided as part of new communities. However, at this stage the idea is too nebulous and evidence of how other options and potential policy conflicts have been considered is unclear.

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** Yes, but this should not be at the expense of identifying sufficient land to meet housing requirements. The Council's aspiration to significantly increase the density of new development is perhaps in conflict with providing land for allotments. It should also be considered that the demand for allotments is mostly driven by people not having sufficient garden space to grow food. There is a reasonable argument that medium density housing with back gardens means that less allotments will be required.

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

Supporting Info

Email

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

Customer Ref: 01700 Response Ref: ANON-KU2U-GWWT-G

Supporting Info Yes

Name Callum Fraser (Iceni Projects)

Email Cfraser@iceniprojects.com

Response Type Agent / Consultant

On behalf of: Taylor Wimpey East Scotland

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 Not Answered

**Explanation** Sufficient detail has not been provided, although it is stated that the Council favours factoring on behalf of the private landowner(s) but will consider adoption should sufficient maintenance resources be made available. We currently tender for the maintenance of open space within our developments and this is then paid for through resident's factors fees. This approach is acceptable, however it can only apply to open space that is of an appropriate size and scale to serve residents of the new development. It is not appropriate for our customers to pay for the long-term maintenance of new large greenspaces that are for the public benefit through factor fees. If the Council is envisaging these spaces to be akin to existing provision, such as the Meadows, then they should be adopted and maintained and managed in a similar manner, and paid for through Council Tax. Furthermore, existing open space provision should be taken into account when applying this policy, if a new site is within suitable distance of a large park, then additional large-scale parks should not be required to be provided on-site.

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

Supporting Info   
Email

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** Yes. In principle we agree these are relevant considerations. However, many of these issues are covered by other policies and regulatory regimes such as building standards. It will be important that any policy avoids duplication and adding unnecessarily to the significant amount of documents already required to accompany applications, adding time and cost to both their preparation and processing. Any policy changes will have to be realistic and rooted an understanding of what is technically feasible. For detailed design details we consider building standards is the most appropriate regulatory regime. Previously introduced policies covering technical areas in a general manner such as on district heating have lacked clarity and an adequate level of understanding of the issues they are dealing with. Caution should be exercised before extending the scope of the planning system and the workload of those who administer it.

Customer Ref: 01700      Response Ref: ANON-KU2U-GWWT-G  
Name: Callum Fraser (Iceni Projects)  
Response Type: Agent / Consultant  
On behalf of: Taylor Wimpey East Scotland

Supporting Info: Yes  
Email: Cfraser@iceniprojects.com

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: Not Answered

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

Customer Ref:  Response Ref:   
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Response Type   
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Supporting Info   
Email

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** No. We support the ambition but it is not clear why this cannot be done through a combination of existing policies and new place briefs /masterplans. Again, and as is a common theme throughout the options, it is not explained in detail what is being proposed. Any new provision must also be possible within land controlled by the applicant or potentially through contributions to the Council where justified. Delivery of associated infrastructure will therefore be phased. However, contributions need to be fairly and reasonably related to what is proposed and must be necessary for the development to proceed. It will be important that the Council avoids a situation where the delivery of early phases of large sites are stalled because all of the land necessary for a such connections is not in the applicant's control. We are concerned that the Council's assessments of individual sites in the Housing Study in respect to accessibility to active travel are not reasonable – being overly demanding on what constitutes good accessibility. In our view, the Council needs to be bolder in encouraging active travel. For example, the Union Canal is dismissed as being over-capacity for cycle use and other existing routes appear to be dismissed without analysis of potential solutions.

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** Taylor Wimpey accept the principle; however the policy is too vague a proposition to support it. It will be important that policies are drawn up with a clear knowledge of how they will cumulatively impact upon developments. Presenting applicants with an irreconcilable set of policy asks will create uncertainty and add complexity and risk to the planning application process. For instance, there will be an appropriate balance to be drawn between density and amenity and this should be considered on a site by site basis, taking account of surrounding character and uses. Policies should therefore be criteria based and not overly prescriptive.

Customer Ref: 01700      Response Ref: ANON-KU2U-GWWT-G  
Name: Callum Fraser (Iceni Projects)  
Response Type: Agent / Consultant  
On behalf of: Taylor Wimpey East Scotland

Supporting Info: Yes  
Email: Cfraser@iceniprojects.com

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: Current Building S

**Explanation** TW support the ambition to reduce carbon emissions and recognise the role that delivering increasing efficient homes can play in this regard. However, there must national consistency and this is not an issue for local planning policy. It is our firm view that emission standards for new buildings should continue to sit within the Building Standards regulatory regime. Furthermore, current additional standards may become out of date with review of building standards. Particularly so as it will only really begin to have an impact from c. 2024 onwards by which time a further review of building standards will be taking place. There is also a benefit of national consistency to offer economies of scale and avoid costly complexity. It must also be considered that the majority of new housing developments in Scotland are currently only achieving bronze standard, which are considered to be a “good” quality. The technology is not currently available to deliver platinum standards at a viable price, and thus ensure deliverability. In our view, it would be more useful to direct funding towards improving energy efficiency of the existing housing stock, which has a far greater impact on emissions. Significant progress has already been made in reducing emissions through building standards reviews and a period of significant further changes over the next five years is already planned. Adding different targets in the planning system simply complicates matters and will place in jeopardy the efficiencies of scale on new technology which could be achieved by pursuing a pan-Scotland approach.

Customer Ref: 01700 Response Ref: ANON-KU2U-GWWT-G

Supporting Info Yes

Name Callum Fraser (Iceni Projects)

Email Cfraser@iceniprojects.com

Response Type Agent / Consultant

On behalf of: Taylor Wimpey East Scotland

Choice 4 A

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

Short Response Not Answered

**Explanation** Taylor Wimpey are keen to engage with local communities and support them in the preparation of Local Place Plans. However, they should not be overused as statutory pre-application is already required for major developments and detailed design policies are already included in policy. We consider that it will be essential that developers and landowners are involved in the creation of design briefs. LPP's must be positively prepared, supporting growth to meet the identified need, and prepared within the current planning policy framework. Care will be needed to ensure that participants are well-informed about constraints and opportunities, to avoid unrealistic expectations and outcomes. Specialist technical input in relation to transport and other disciplines will also be required. It will also be important to avoid delay to what already appears to be an overly-ambitious timetable for the delivery of housing. We object to new development being required to fund new healthcare facilities. We understand that 62 of the 70 GP practices in Edinburgh are privately operated businesses. We fully support the functioning of a well-funded NHS, however, this is funded from general taxation and the purpose of s.75 contributions is clearly not to finance the capital costs of private businesses. We consider it is preferable for developer obligations to remain focused on their current scope.

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

Supporting Info   
Email

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** See 4A above – Taylor Wimpey are keen to work with local communities to prepare LPP’s. Technical input from other specialisms will also be required. Taylor Wimpey are keen to engage with local communities and support them in the preparation of Local Place Plans. However, they should not be overused as statutory pre-application is already required for major developments and detailed design policies are already included in policy. We consider that it will be essential that developers and landowners are involved in the creation of design briefs. LPP’s must be positively prepared, supporting growth to meet the identified need, and prepared within the current planning policy framework. Care will be needed to ensure that participants are well-informed about constraints and opportunities, to avoid unrealistic expectations and outcomes. Specialist technical input in relation to transport and other disciplines will also be required. It will also be important to avoid delay to what already appears to be an overly-ambitious timetable for the delivery of housing. We object to new development being required to fund new healthcare facilities. We understand that 62 of the 70 GP practices in Edinburgh are privately operated businesses. We fully support the functioning of a well-funded NHS, however, this is funded from general taxation and the purpose of s.75 contributions is clearly not to finance the capital costs of private businesses. We consider it is preferable for developer obligations to remain focused on their current scope.

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** Yes. However, care should be taken in assessing what is required and ensuring that the requirements for new infrastructure are properly justified, reasonable and proportionate.

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

Supporting Info   
Email

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 Yes. However, we are concerned that the methodologies for assessing the need for facilities and infrastructure are flawed. For example, the PTAL method for assessing public transport accessibility does not appear fit for purpose. In some cases, it concludes that sites have poor accessibility even when located directly next to high frequency bus routes.

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 Yes, for large scale developments. It should be recognised in policy that there will be opportunities for smaller scale development to be located in less accessible areas.

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

Supporting Info   
Email

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 TW welcome clarity at the plan stage on what infrastructure will be expected to be provided. The requirement for any infrastructure must be properly justified having regard to policy and should be able to be viably delivered. We do not agree with contributions being required towards healthcare facilities that are run as private practices.

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 Disagree. Cumulative contribution zones have not proved to be sufficiently robust to meet the Planning Circular test for reasonableness, proportionality etc because of lack of evidence to justify that the required infrastructure is directly related to the development in question.

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

Supporting Info   
Email

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

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

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

Supporting Info   
Email

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 Yes, as long as the participation is well-informed and realistic. People still need cars for trips where public transport or active travel is not an option. It may be too easy for communities with existing good access to parking to seek that new development does not also benefit. A balance needs to be struck between encouraging behaviour change and proving places, which are attractive and convenient for people to live.

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 No. As with the above policies there are very few details on which to base our response. It will be more important that any targets for trips are realistic. The appropriateness of this policy will be dependent the details.

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 No comment

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

Supporting Info   
Email

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

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Supporting Info   
Email

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 No. We consider that the proposed policy is likely to be too prescriptive and should have regard to surrounding character. We support the aim of achieving mixed uses, but that consideration depends on the mix of uses surrounding the site and the market interest/ deliverability of housing on the site. Requiring housing to be delivered on all sites over 0.25ha is unworkable.

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 We agree to the principle of this policy, however this approach may be difficult to implement in practice, as there will be site specific consideration. The land made available would need to be of sufficient size to enable volume housebuilders to deliver high quality housing development and it would need to be viable.

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

Supporting Info   
Email

Choice **11 A**

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

Short Response

Explanation No. Not as a general rule as such a policy would not accord with Scottish Planning Policy paragraph 129, which states; "The level of affordable housing required a contribution within a market site should generally be no more than 25% of the total number of houses".

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 No. We support the provision of a wide variety of housing types and tenures. Affordable housing sizes will be informed by the Council's information on need and waiting lists. We support the focus on ensuring family housing is available. However, we do not consider it is necessary to apply prescriptive targets for the mix of market housing. There needs to be sufficient flexibility to respond to variations in demand over time and across different locations. A degree of flexibility is consistent with SPP which states "Planning can help to address the challenges facing the housing sector by providing a positive and flexible approach to development." (para. 109)

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Supporting Info Yes  
Email Cfraser@iceniprojects.com

Choice 12 A

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

Short Response Not Answered

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

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

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

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

Customer Ref: 01700 Response Ref: ANON-KU2U-GWWT-G

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

Customer Ref: 01700      Response Ref: ANON-KU2U-GWWT-G  
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many cases this may make residential development economically unviable.2. The City Plan Industrial Property Market finds that industrial site vacancy rates are low in Edinburgh and rents are growing. This picture is similar in South East Scotland with Ryden's 85th Scottish Property Review noting that vacancies are at record low levels (p. 20). Moving location will be difficult for many operators and so they may well place a particularly high value on sites for owner-occupiers or outstanding lease periods for tenants. This will mean that asking prices for those that may be willing to sell could also reflect valuations of the operating companies as going concerns. Many of these sites will have already been considered by private developers with the landowners approached. It is for the Council to explain how, despite having not come forward to date, they will be delivered for housing, despite the financial burdens of planning policy being increased, reducing the land value which could be offered by a prospective developer. The lead in times for many of the sites, even if they are in single ownership and can be viably developed, will be lengthy. Existing leases would need to expire or be bought out, which would add to viability challenges. However, for many sites, there will be multiple ownerships, where conflicting interests will add to the difficulties. Compulsory purchase is unlikely to be solution due the complexity, length, cost and uncertainty of the procedure. It is questionable whether CPO would be successful if seeking to acquire land occupied by active businesses with employees unless there were already other suitable premises in suitable locations available. One would also question the desire of the Council to even want to proceed in individual cases that involved forcing the closure of businesses and related loss of employment. The time taken to go through the process should also not be underestimated. It will presumably be necessary to give the owners a chance to bring the site forward for development themselves. This could be a period of five years, but many sites may well have current leases lasting longer than this. It would then be necessary to make efforts to obtain the sites on the open market. A CPO may be able to be ran alongside this but the process would still take many years. For instance for the St James Centre, approaches were first made to owners in 2008 and has only been completed 12 years later. The costs and logistics of running multiple contentious CPOs simultaneously will also likely be prohibitive. Moreover, much of this land is currently in employment use, and the Choices document says intervention will be required to deliver 275 hectares of employment land. There is virtually nothing in the Choices document to explain how this provision of employment land will transition without resulting in significant economic upheaval and related negative impacts for employment and service delivery.

Option 2 Option 2 proposes 27,900 homes on a number of large-scale greenfield sites around the City. Although we support the release of these sites, there are a number of flaws in this strategy. Firstly, the number of homes proposed is only just over half of the additional new homes required to meet housing need and demand in full. Secondly, it is unlikely that the number of houses proposed can be delivered on these sites by 2032. There are about eight or nine site ownership interests involved and a rough calculation would suggest that each of these might deliver in the region of 300 homes per year once started. Given the strategic nature of these sites and the lengthy planning and related consenting process it is realistic to assume that development is unlikely to begin until 2025 at the earliest. An optimistic assumption might be that each site will therefore deliver 300 houses/year for a 7-year period up to 2032, producing a total of approximately 16,800 houses, which is significantly below the ambition of 27,900. It is therefore clear that significant additional new sites are be required, simply to get closer to meeting full housing need and demand.

Option 3 Option 3 is described as the blended approach, focussing on greenfield and brownfield land. However, it too has fundamental shortcomings. Firstly, it only proposes 17,600 houses in total, the same as Option 1, which as explained above is only a fraction of what is required to meet Edinburgh's housing need and demand. Secondly, although it assumes 11,000 houses are built on the 142 urban brownfield sites identified rather than 17,600 in Option 1, in our view this continues to be a very significant over-estimate of what can be achieved for the reasons we have explained under Option 1. Also, the proposal for 6,600 houses on greenfield sites significantly under-utilises the delivery potential on sustainable sites around Edinburgh.

ALTERNATIVE OPTION 3 We agree that a 'blended approach' of greenfield and brownfield land release for housing is appropriate but it should seek to deliver significantly more homes than is likely to arise from Option 3. If Edinburgh's housing need and demand is to be met in full then that would mean that new land for 52,837 homes would need to be identified.

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

Choice 12 B1

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

Short Response Not Answered

Explanation

Customer Ref:

01700

Response Ref:

ANON-KU2U-GWWT-G

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Yes

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On behalf of:

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Choice

12 B2

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

Short Response

Yes

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

Yes

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

Not Answered

Explanation

Customer Ref: 01700      Response Ref: ANON-KU2U-GWWT-G  
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Choice 12 B5

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

Short Response: Yes

Explanation

Choice 12 B6

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

Short Response: Not Answered

Explanation

Choice 12 B7

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

Short Response: Not Answered

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

Customer Ref:  Response Ref:

Supporting Info

Name

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** We support the Greenfield releases of land at Norton, Kirkliston and The Drum. These strategic allocations are accessible and sustainable and their release for housing will contribute to Edinburgh Council meeting their housing land requirement. However, large-scale releases, will require upfront investment in infrastructure and can take time to deliver. The Proposed Plan will also have to identify additional smaller land releases, in order to provide choice and ensure delivery. Logical extensions to existing settlements, such as Baird Road, Ratho and infill development opportunities, such as land at Muirwood Road, Currie should also be allocated.

Choice **12 C**

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

Short Response

**Explanation**

Choice **12 C**

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

Short Response

**Explanation**

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **12 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

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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** Taylor Wimpey are broadly supportive of ‘an area of search’ which allows a wide consideration of future uses within West Edinburgh depending on the findings of the West Edinburgh Study and future decisions by the Scottish Government on uses within West Edinburgh. Whilst we would support this approach in principle, it is important to identify individual, sustainable sites in City Plan 2030 which can support a range of uses including housing. The Local Development Plan is responsible for identifying enough land to deliver the required number of homes to meet housing need and demand. The Land at Norton Park is one of the most sustainable and accessible sites in West Edinburgh. The City Mobility Plan which is currently being consulted upon shows that the site would also benefit from a potential new tram route or a bus rapid transit (BRT) link through the site.

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

Supporting Info   
Email

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** Taylor Wimpey welcomes the Council’s proposals to remove the safeguard in the existing plan for the Royal Highland Showground site to the south of the A8 at Norton Park and the site allocated for other uses. The Policy contained within the existing plan states that: “The site of the Royal Highland Centre may be required for airport uses in the long term to meet air passenger growth forecasts. Therefore, development which would prejudice the long-term expansion of Edinburgh Airport will not be supported, except where it is compatible with the current use of the site by the Royal Highland Centre, in the context of this policy.” Reference to the relocation of the Royal Highland Showground is also made in National Planning Framework 3 (NPF3). The current safeguard and reference in NPF3 sterilises the site for alternative uses and this needs to be removed in order for the other uses to come forward, such as residential development, to accommodate sustainable and inclusive urban growth. As we have made clear in our representations, we do not consider that the Council’s preferred option, to only allocate brownfield land, is deliverable and therefore there is a requirement for the LDP to allocate suitable greenfield sites for development in order to meet housing need and demand. The site at Norton is a greenfield site provides a key opportunity for a sustainable, connected mixed-use development that will help to meet the significant demands for new housing provision within Edinburgh. The City Plan 2030 Housing Study states that the site is considered suitable for development, however, any allocation would be on the condition of the removal of this constraint. It is therefore important that the safeguard is removed for the site to be allocated. Taylor Wimpey has made separate representations to the NPF4 early engagement consultation requesting that reference to the safeguard is removed. We would encourage the Council to enter dialogue with the Scottish Government as soon as possible given that a proposed City Plan 2030 and proposed NPF4 are due out at the same time.

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**

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 15 A

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

Short Response

Explanation

Choice 15 B

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

Short Response

Explanation

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

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

Supporting Info   
Email

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

Choice 15 G

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

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

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

Supporting Info

Email

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

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

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

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

Supporting Info   
Email

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

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

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

# Taylor Wimpey



**Ratho**

ENGINEERING DESKTOP REPORT

**September 2019**



**Client:**

Taylor Wimpey West Scotland  
Unit C, Ground Floor  
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<b>Report Reference:</b>			
	<b>Name</b>	<b>Signature</b>	<b>Date</b>
<b>Originator:</b>	<b>D Kirkby</b>		<b>17/09/2019</b>
<b>Checked By:</b>			

<b>Revision Record:</b>			
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## Contents

<b>1. INTRODUCTION .....</b>	<b>3 -</b>
Appointment .....	3 -
Site Description .....	3 -
Development proposals .....	3 -
<b>2. SITE TOPOGRAPHY &amp; LEVELS .....</b>	<b>4 -</b>
<b>3. SURFACE WATER DRAINAGE .....</b>	<b>4 -</b>
Existing surface water drainage .....	4 -
Flooding.....	5 -
Existing Foul drainage .....	5 -
Proposed surface water drainage .....	6 -
Proposed Foul drainage .....	7 -
<b>4. UTILITIES.....</b>	<b>7 -</b>
Existing utilities .....	7 -
<b>5. GROUND CONDITIONS .....</b>	<b>7 -</b>
<b>6. SUMMARY .....</b>	<b>9 -</b>

## List of Figures

Figure 1 - Location Plan .....	3 -
Figure 2 – Existing watercourse locations .....	4 -
Figure 3 – SEPA flood map extract .....	5 -
Figure 4 – Scottish Water Record Plan .....	6 -

## List of Appendices

- Appendix 1 - Drawings
- Appendix 2 - Existing record plans
- Appendix 3 – Mason Evans Desktop
- Appendix 4 – Scottish Water PDE response

# 1. INTRODUCTION

## Appointment

Indev Consult Ltd have been appointed as Civil Engineering Consultants to undertake a desktop engineering assessment at Taylor Wimpey Scotland's proposed development site at Freelands Road, Ratho. The report will investigate desktop ground conditions, topography, drainage strategy and utilities, where available.

## Site Description

The site is located to the north of Ratho bounded by the M8 motorway along the north and Freelands Road to the south. The site currently comprises agricultural fields and is bounded by further fields to the east and west. A small residential development and farm buildings are also located along the southern boundary with Baird Road forming the western boundary. A cemetery is located at the south west corner as shown in Figure 1.

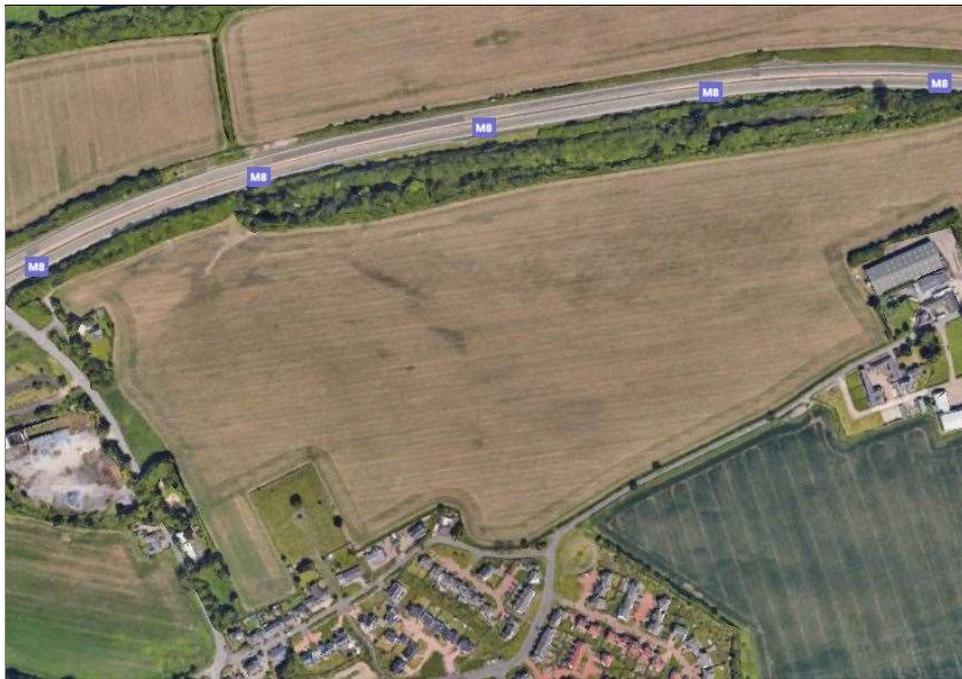


Figure 1 - Location Plan

## Development proposals

An initial layout has not yet been provided for the development, as it is at the feasibility stage, however it is anticipated the development will comprise 2 storey housing with associated roads, open space and SUD features.

Given the development will be in excess of 300 units at least two separate access points will be required in accordance with City of Edinburgh Council guidelines. A Transport Assessment will be required to confirm suitability of these access locations

## 2. SITE TOPOGRAPHY & LEVELS

From available aerial data the topography generally falls from south west to north east ranging from approximately 73m AOD to 58m AOD at the north east corner.

A full topographical survey will require to be undertaken to enable a more detailed assessment to confirm if gradients are within developable limits or significant earthworks will be required and to advise suitable drainage connection levels.

## 3. SURFACE WATER DRAINAGE

### Existing surface water drainage

The closest watercourses are two unnamed burns, just outside the site boundary to the north, running parallel with the M8. A small pond feature is present on this watercourse. These two features connect to form a single burn and pass through a culvert below the M8. The Union Canal is located several hundred metres to the south. The locations of these features are indicated in Figure 2.

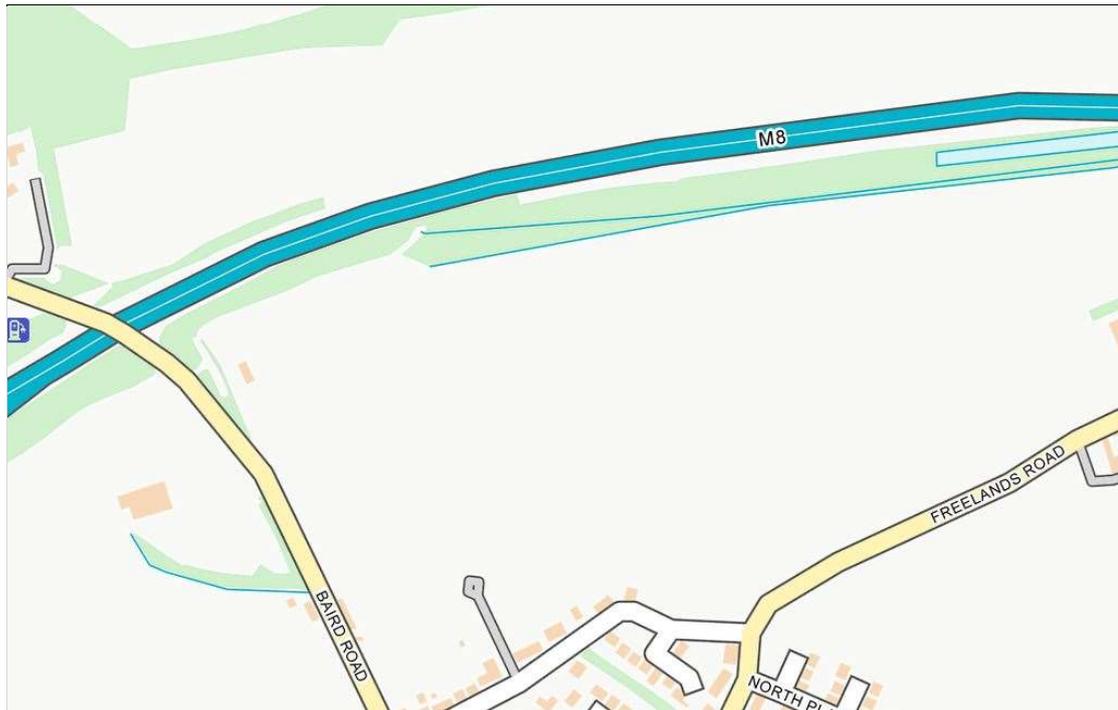


Figure 2 – Existing watercourse locations

Scottish Water record plans, in appendix 2, show a 900mm diameter culvert crossing the north west corner of the site which discharges to the southernmost burn feature. Further surface water apparatus is shown within the existing residential area to the south west. No adopted sewers are present within the site boundary.

## Flooding

SEPA flood maps show that pluvial flooding is present along the western length of the burns, as shown in figure 3, with surface water flooding indicated to the east at the location of the M8 culvert, which is most likely associated with the available capacity in this structure. Within the site there are several small areas of pluvial flooding that will also need to be assessed.

A flood risk assessment will be required that would need to consider risks from all these sources, including the unnamed tributaries, surface water runoff, existing ponds and groundwater. It is thought likely that there would need to be modelling of the unnamed watercourse and some of the land drains within the site which would require additional channel cross-section surveys.

The majority of the current masterplan proposals are outwith the flooding areas and as such will not have a large impact on the .

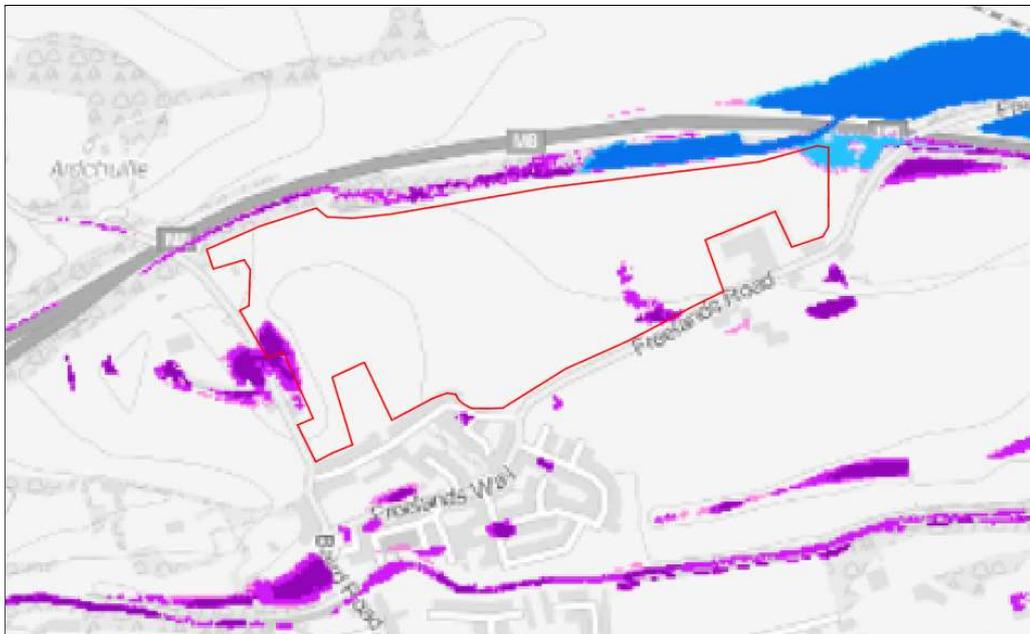


Figure 3 – SEPA flood map extract

## Existing Foul drainage

The existing Scottish Water record plan, shown in figure 4, indicates a 225mm diameter combined sewer crossing the north west corner of the site, increasing to 375mm diameter prior to crossing the M8. This sewer conveys flows from the development to the south. A pumping station and associated rising main are shown serving the southern development.



Figure 4 – Scottish Water Record Plan

### Proposed surface water drainage

It is proposed that surface water from the development will discharge to the unnamed watercourse via a detention basin located along the northern boundary as indicated in drawing 19-111-Sk-20 in appendix 1. Confirmation is required to advise if the title extends to the watercourse or whether 3<sup>rd</sup> party land will be required. Calculations have been undertaken utilizing FEH rainfall data, and Windes, based on a greenfield release, and the resultant the discharge rate and 1:200-year attenuation volume, for the basin, are noted in the table below.

Table 1 – Attenuation Volumes

Site area (m <sup>2</sup> )	Release (l/s)	Preliminary Attenuation Volume ( m <sup>3</sup> )
172,130	75	4953

With regard to water quality the effect of a development discharge on the watercourses must be considered and any detrimental effects mitigated against. A primary consideration is pollution for road, footpaths and car parking areas (e.g. suspended solids and silt, oil, etc.), and in accordance with City of Edinburgh Council, Scottish Water and SEPA requirements, such areas will require two levels of surface water treatment.

The first element of the treatment will be within the detention basin which will be designed in accordance with current Scottish Water Sewers for Scotland requirements. The second level will be within an end of line swale immediately downstream of the basin. This proposal is not prescriptive and secondary treatment will be required to meet the current CIRIA Simple Index Approach guidance. Further discussion with Scottish Water/SEPA and City of Edinburgh Council is required subject to detailed design, these can be in the form

of but not limited to, swales, porous paving, filter trenches, and bioretention facilities. This element will be subject to detailed layouts and design.

### Proposed Foul drainage

It is proposed that foul drainage from the development will discharge to the combined apparatus within the site boundary at the north west corner. A gravity connection will not be possible, due to topography, and a pump station will be required adjacent to the SUDs basin with a rising main extending to the west. The existing sewers will be incorporated within the layout allowing for the appropriate servitudes or diverted if required.

A Pre-Development Enquiry was submitted to Scottish Water to confirm availability of foul drainage capacity. The response, available in appendix 4, advises there is currently capacity in the Newbridge PFI Wastewater Treatment Plant however a Drainage Impact Assessment will be required to confirm capacity in the existing network to accommodate the demands from the development.

## 4. UTILITIES

### Existing utilities

Atkins Utility information is available and apparatus is shown on Drawing 19-111-Sk-10 and is summarised below.

Affected	
Scottish Water (Water)	No water mains are indicated within the site boundary. 150mm and 90mm diameter mains are shown in the west of Baird Road and south of Freelands Road respectively.
SP Power Systems	Overhead HV cable on the eastern site boundary. Below ground LV cables located within Baird Road and Freelands Road.
Open Reach	Localised overhead apparatus outside south east of site. Below ground apparatus located with surrounding carriageways. Nothing noted within the site boundary.
SGN	125mm diameter main shown within Baird Road, with a number of small diameter connections to adjacent properties. No apparatus shown within the site boundary

## 5. GROUND CONDITIONS

A Site Investigation is not currently available for the site and Mason Evans Partnerships have completed a review of available data in their archives and can provide the following desktop comments.

The indicated conditions at the site can be summarised as follows:

- **Historical review** - The earliest Ordnance Survey map edition, dated 1843, indicated the site and the immediate surrounding areas to be largely unoccupied land. Within the surrounding area, the Glasgow and Edinburgh Railway was recorded approximately 400m to the north of the proposed development site by 1843 and then from 1907, a burial ground was recorded immediately to the south-west of the site. Furthermore, between 1944 and 1967, works were noted immediately to the west of the proposed development site. The site area was bound to the north by woodland before the construction of the M8 during the 1990's. Furthermore, Freelands Road was recorded to the south during the early 1900's.

In summary, the site has been essentially 'greenfield' since 1843, with the surrounding area also generally undeveloped with occasional cottages and a school noted.

- **Superficial deposits** – The British Geological Survey (BGS) indicated the superficial deposits beneath the site to be generally glacial till, with an area in the west potentially underlain by sand and gravel deposits. Historical boreholes sunk within the immediate surrounding area indicated the superficial deposits to be up to 18 m in thickness. Made ground deposits, associated with the surrounding development could also be anticipated, although this was considered unlikely.
- **Geology** - The underlying solid strata were indicated to belong to the Carboniferous aged Lower Oil-Shale Group, which typically consists of sandstones, siltstones, mudstones, thin limestones and bituminous shales with several thin oil shale seams. No significant geological faults were recorded within the immediate vicinity of the site. No oil shale seams were indicated to outcrop within the vicinity of the site. A review of the 'Oil-Shales of the Lothians' geological memoirs also confirmed that most of the oil shale working occurred within the Kirkliston area. Therefore, oil-shale workings are not considered to pose a significant risk to the proposed development.
- **Mining** - In addition to the above, the site is not within a '*Coal Mining Reporting Area*' or '*Development High Risk Area*' and as such, coal mining instability is not considered to pose a constraint to the proposed development.

No mine entries were recorded within the vicinity of the site.

- **Contamination and Gas Emissions** - Given the generally greenfield nature of the site, and the lack of historical development onsite, the risk of chemical contamination was considered to be low. However, a limited number of potentially contaminative off-site sources were identified and therefore ground investigations would be required to investigate the existence of these potential off-site source-pathway-receptor linkages. Similarly, the possible existence of gas emissions at significant levels can only be assessed through monitoring.  
The UK Radon map suggests that the site is within a low radon probability area (1%) and therefore protection measures are considered unlikely.

Detailed designs will require a comprehensive investigation that would identify the development conditions, constraints and remedial solutions. The report would fully support Planning and Building Warrant submissions and enable potential land purchasers to fully understand the development conditions and the levels of abnormal ground related costs. Mason Evans have advised proposals for this in appendix 3.

## 6. SUMMARY

### Surface Water Drainage

- Single SUDs ponds located at north east corner of site.

### Foul Drainage

- Pumped outfall with rising main connecting to foul sewer within site boundary.
- Existing foul sewer crossing site to be incorporated within layout or diverted to suit proposals.
- SW advise capacity available at Wastewater Treatment Plant however DIA required to confirm capacity network.

### Flooding

- Flooding noted within watercourses to the north and culvert at M8, however appears to be outwith development areas.

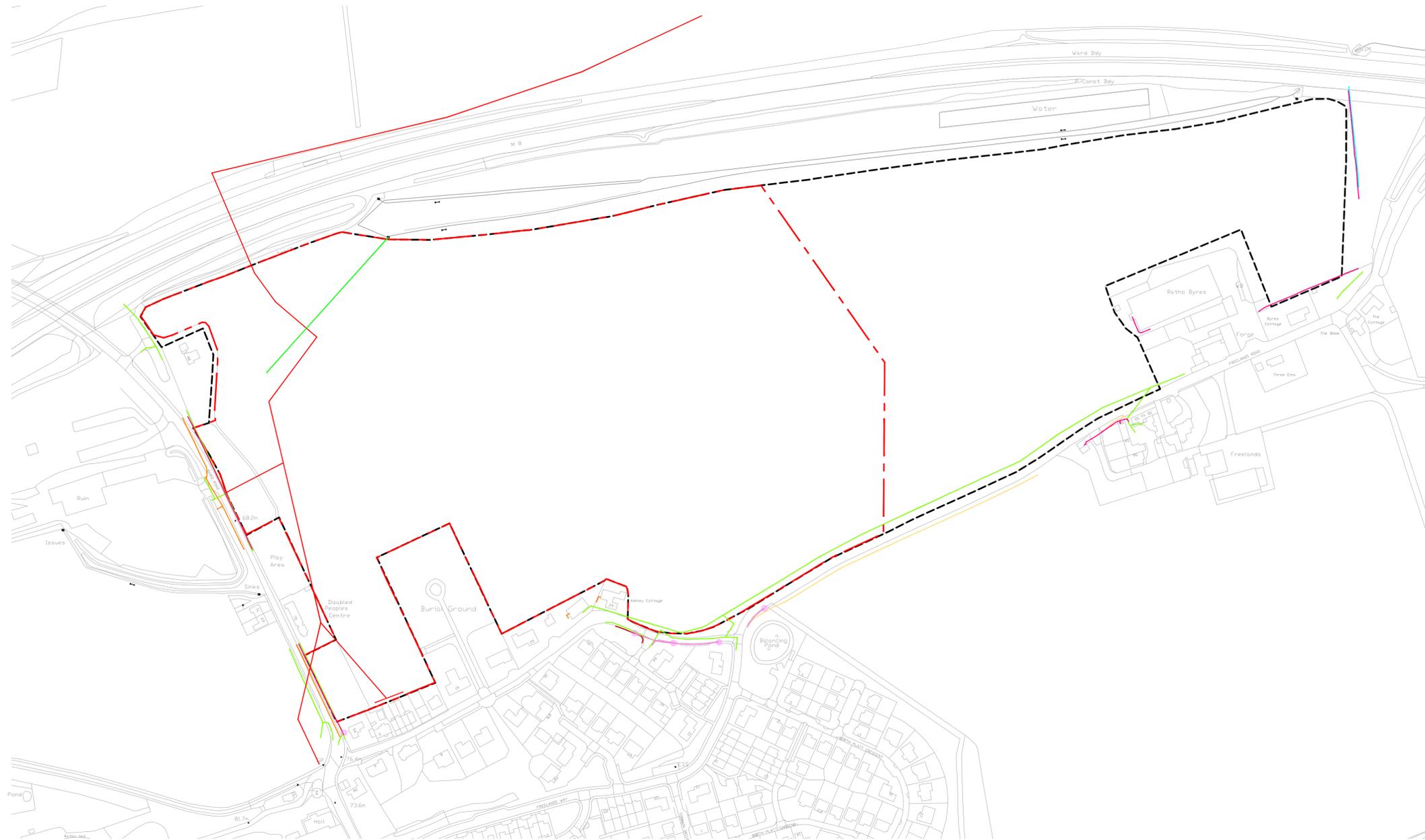
### Ground conditions

- Predominantly greenfield site.
- Site generally underlain with glacial till.
- No mining constraint or entries within site boundary.
- Contamination from agricultural use possible.

### Utilities

- No major utilities crossing through site.
- HV cable and substation on southern site boundary.
- All utilities available in close proximity to site however capacities unknown at this time.

## Appendix 1



- NOTES:
- DO NOT SCALE FROM THIS DRAWING
  - THE CONTRACTOR SHALL BE RESPONSIBLE FOR CHECKING AND VERIFICATION OF ALL DIMENSIONS ON SITE PRIOR TO COMMENCEMENT
  - THE CONTRACTOR SHALL CONFIRM AND BRING TO THE ATTENTION OF THE ENGINEER ANY DISCREPANCIES CONTAINED IN THIS DRAWING PRIOR TO COMMENCEMENT.

	City of Edinburgh - Street Light
	Openreach - (British Telecommunications)
	SGN - (Scotland Gas Networks)
	SP Energy Networks - (Scotland)
	SSE - Gas
	SSE - Low Voltage
	Transport Scotland - South East (Army)
	Scottish Water Foul Drainage
	Scottish Water Surface Water


A	Site boundary revised	SC	02/03/2020	
Rev	Description	Drwn	Chkd	Date

Indev Consult Ltd - Dwart House - Strathclyde Business Park  
 3 Finch Way - Bellshill - ML4 3PP - tel: 01698 744 610  
 email: info@indevconsult.com

**Taylor Wimpey**  
 Unit C Ground Floor Circus  
 Glasgow Airport Business Park  
 Marchburn Drive, Abbotsinch  
 Paisley PA3 2SJ

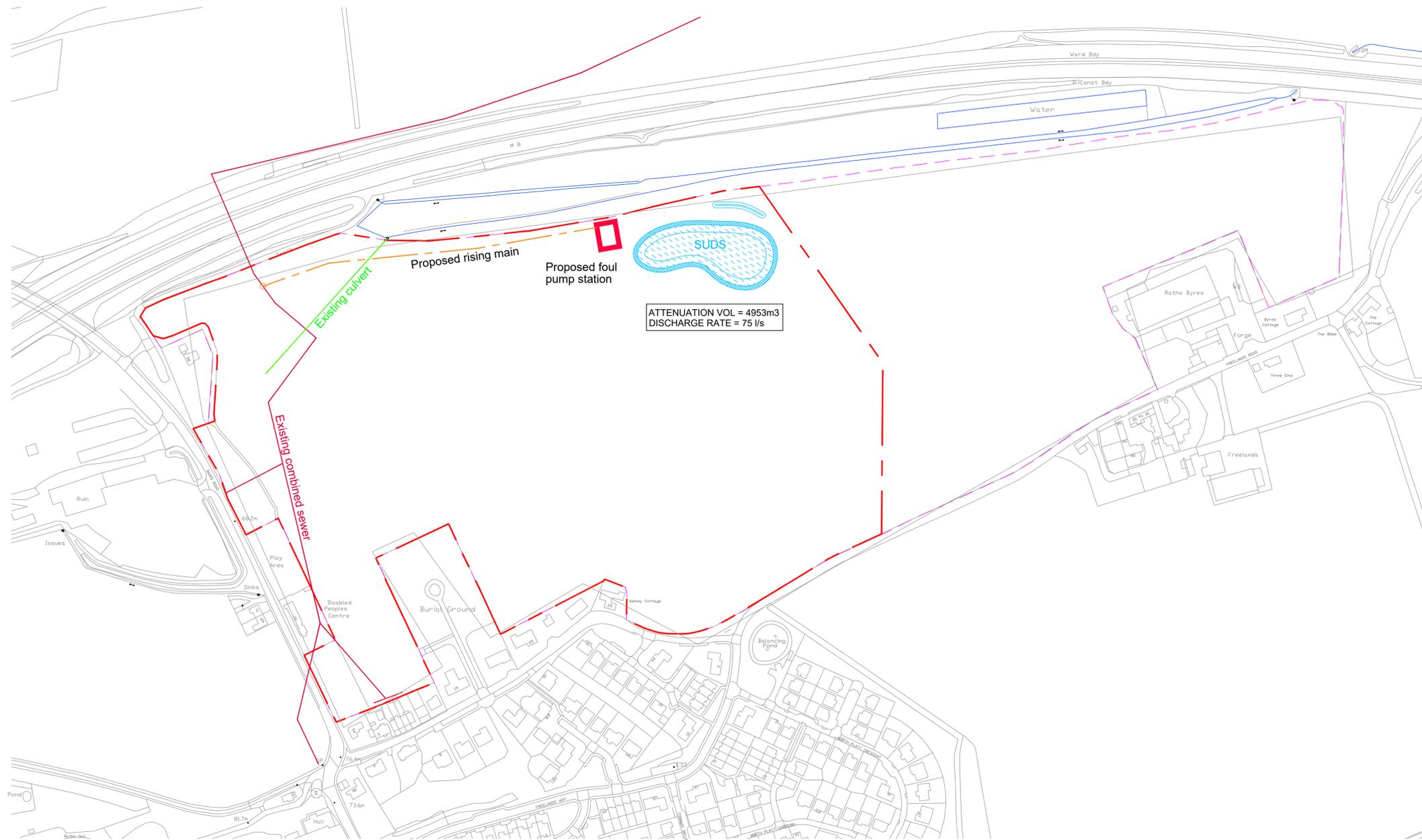
Project Title: RATHO

Drawing Title: EXISTING UTILITIES

Drawn By:	Checked By:	Issue Status:
ZB		INFORMATION

Date Drawn: 10/09/2019 Scales: 1:2000

Drawing Number:	Revision:
19-111-Sk-10	A



- NOTES:
- DO NOT SCALE FROM THIS DRAWING
  - THE CONTRACTOR SHALL BE RESPONSIBLE FOR CHECKING AND VERIFICATION OF ALL DIMENSIONS ON SITE PRIOR TO COMMENCEMENT
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A	Site boundary revised	SC		02/03/2020
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Indev Consult Ltd - Duart House - Strathclyde Business Park  
 3 Finch Way - Bellshill - ML4 3PP - tel 01698 744 610  
 email info@indevconsult.com

**Taylor Wimpey**  
 Unit C Ground Floor Circus  
 Glasgow Airport Business Park  
 Marchburn Drive, Abbotsinch  
 Paisley PA3 2SJ

Project Title: RATHO

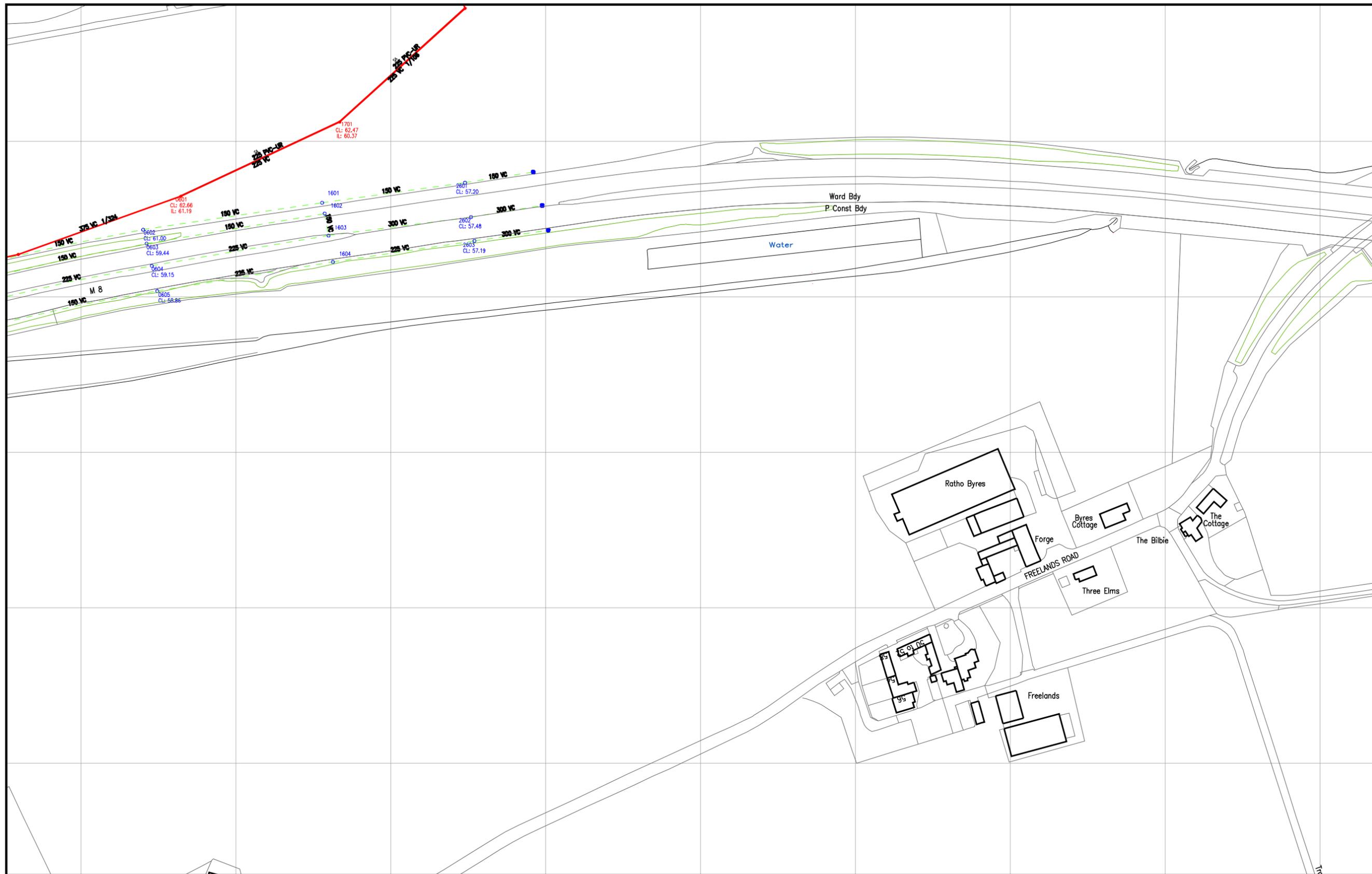
Drawing Title: DRAINAGE MASTERPLAN

Drawn By: ZB    Checked By:    Issue Status: INFORMATION

Date Drawn: 10/09/2019    Scales: 1:2000

Drawing Number: 19-111-Sk-20    Revision: A

## Appendix 2



The representation of physical assets and the boundaries of areas in which Scottish Water and others have an interest does not necessarily imply their true positions. For further details contact the appropriate District Office.

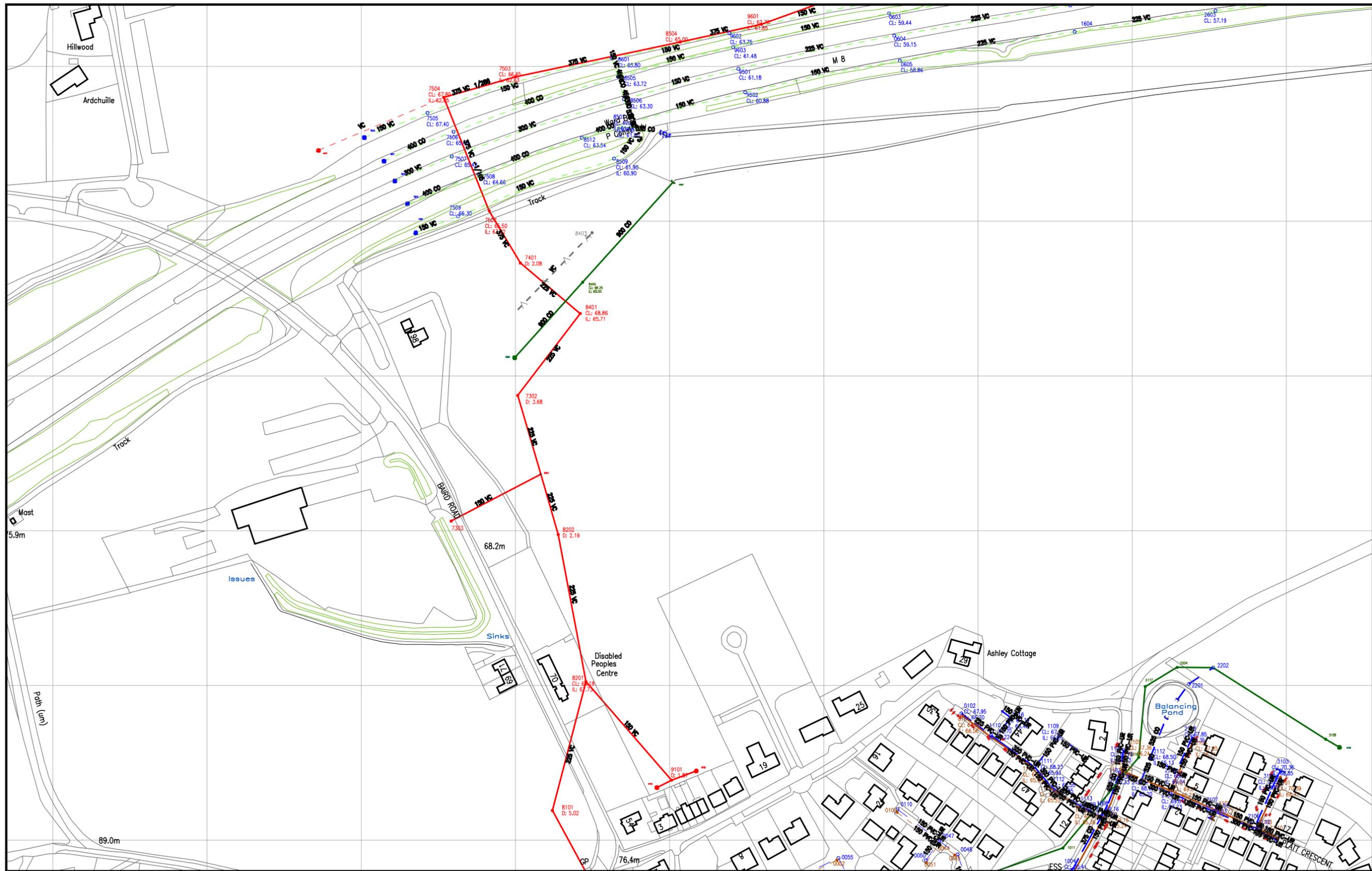
Date Plotted: 19/09/2019



Scale: 1:2500

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**Scottish Water**  
 Always serving Scotland  
 Castle House,  
 6 Castle Drive,  
 Dunfermline,  
 KY11 8GG  
 Tel No: 0845 601 8855



The representation of physical assets and the boundaries of areas in which Scottish Water and others have an interest does not necessarily imply their true positions. For further details contact the appropriate District Office.

Date Plotted: 19/09/2019



Scale: 1:2500

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Date Plotted: 19/09/2019



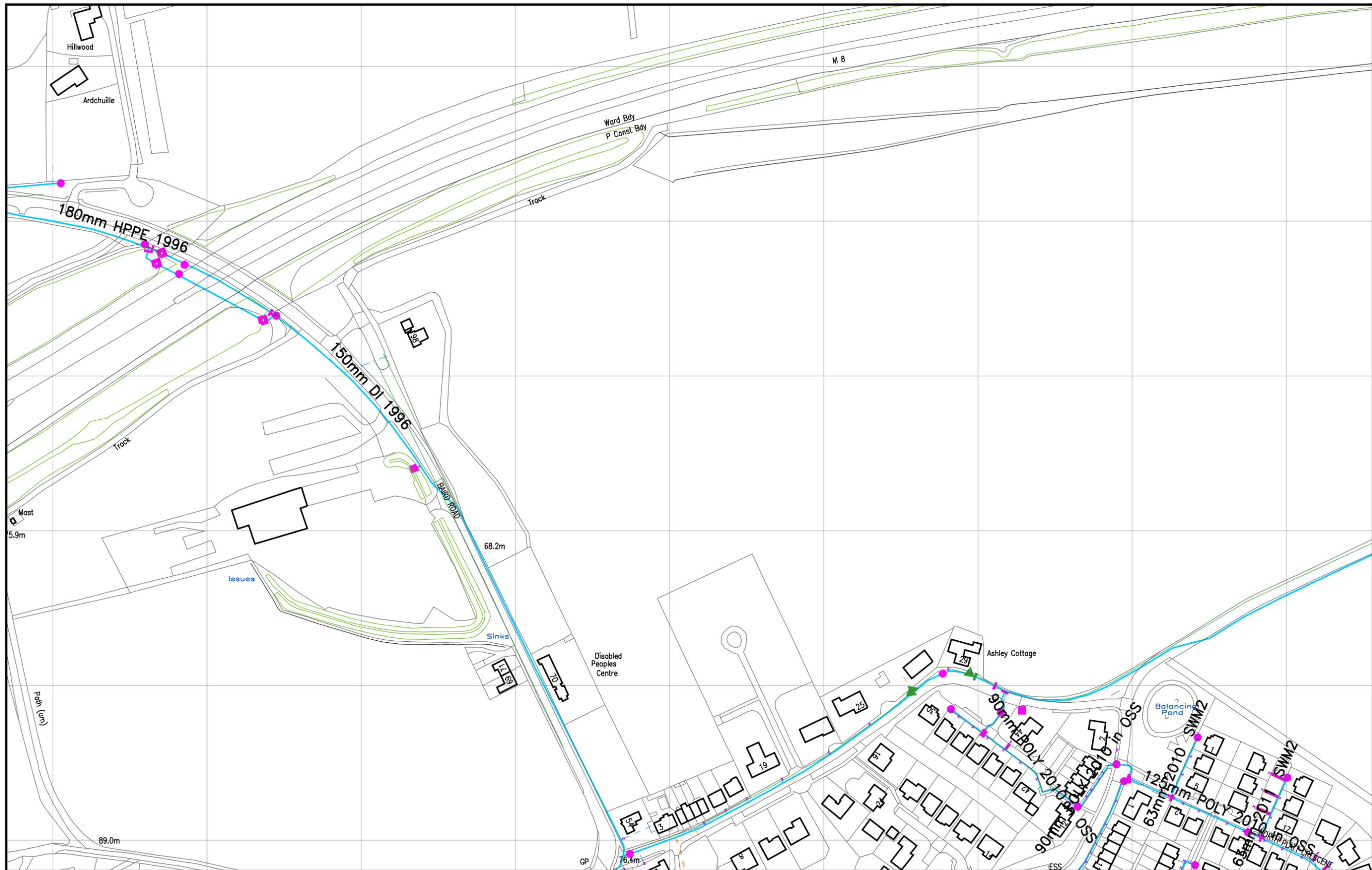
Scale: 1:2500

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Dunfermline,  
KY11 8GG  
Tel No: 0845 601 8855

## Appendix 3

## Appendix 4

**From:** Gavin Law <Gavin.Law@edinburgh.gov.uk> on behalf of SRWR Street Lighting <SRWR.StreetLighting@edinburgh.gov.uk>  
**Sent:** 16 August 2019 13:43  
**To:** Utility Solutions GDC Requests  
**Subject:** RE: Urgent Plant Enquiry - 78629 - Site off Baird Road and M8, Edinburgh - Please respond by 21/08/2019  
**Attachments:** CEC Street Lighting - 78629 - Site off Baird Road and M8, Edinburgh.pdf

**Follow Up Flag:** Follow up  
**Due By:** 21 August 2019 00:00  
**Flag Status:** Flagged



Regarding your enquiry below, please find attached plan(s) showing City of Edinburgh Council street lighting cabling and/or apparatus within the area on the site details map which you enclosed.

If you have any queries please contact us.

Kind Regards

Gavin Law

Gavin Law | Business Support Assistant | Customer Services and Information Technology | Resources | Business Support | The City of Edinburgh Council | Bankhead Depot | 14 Bankhead Avenue | Edinburgh | EH11 4HD | Tel: 0131 458 8059 | gavin.law@edinburgh.gov.uk | [www.edinburgh.gov.uk](http://www.edinburgh.gov.uk)

---

**From:** Utility Solutions GDC Requests [mailto:requests.utilitysolutions@atkinglobal.com]  
**Sent:** 16 August 2019 05:33  
**To:** plantenquiries@catelecomuk.com; plantenquiries@energetics-uk.com; plantenquiries@instalcom.co.uk; opburiedservicesenquiries@networkrail.co.uk; nrswa@sky.uk; assetrecords@utilityassets.co.uk; osp-team@uk.verizon.com; National Plant Enquiries <OSM.enquiries@atkinglobal.com>; advice@sepa.org.uk; SRWR Street Lighting <SRWR.StreetLighting@edinburgh.gov.uk>; occr.sescotland@amey.co.uk; david.ross@amey.co.uk  
**Subject:** Urgent Plant Enquiry - 78629 - Site off Baird Road and M8, Edinburgh - Please respond by 21/08/2019  
**Importance:** High

**Urgent- It would be greatly appreciated if you could reply ASAP, where possible by 21/08/2019.Thanks in advance.**

Our Reference: 78629  
Site Name: Site off Baird Road and M8, Edinburgh  
Works Description: Building Works - Low Rise  
Site Grid References: 314133 671380,314708 671632,313694 671459,314693 671642,313859 671118

To whom it may concern,

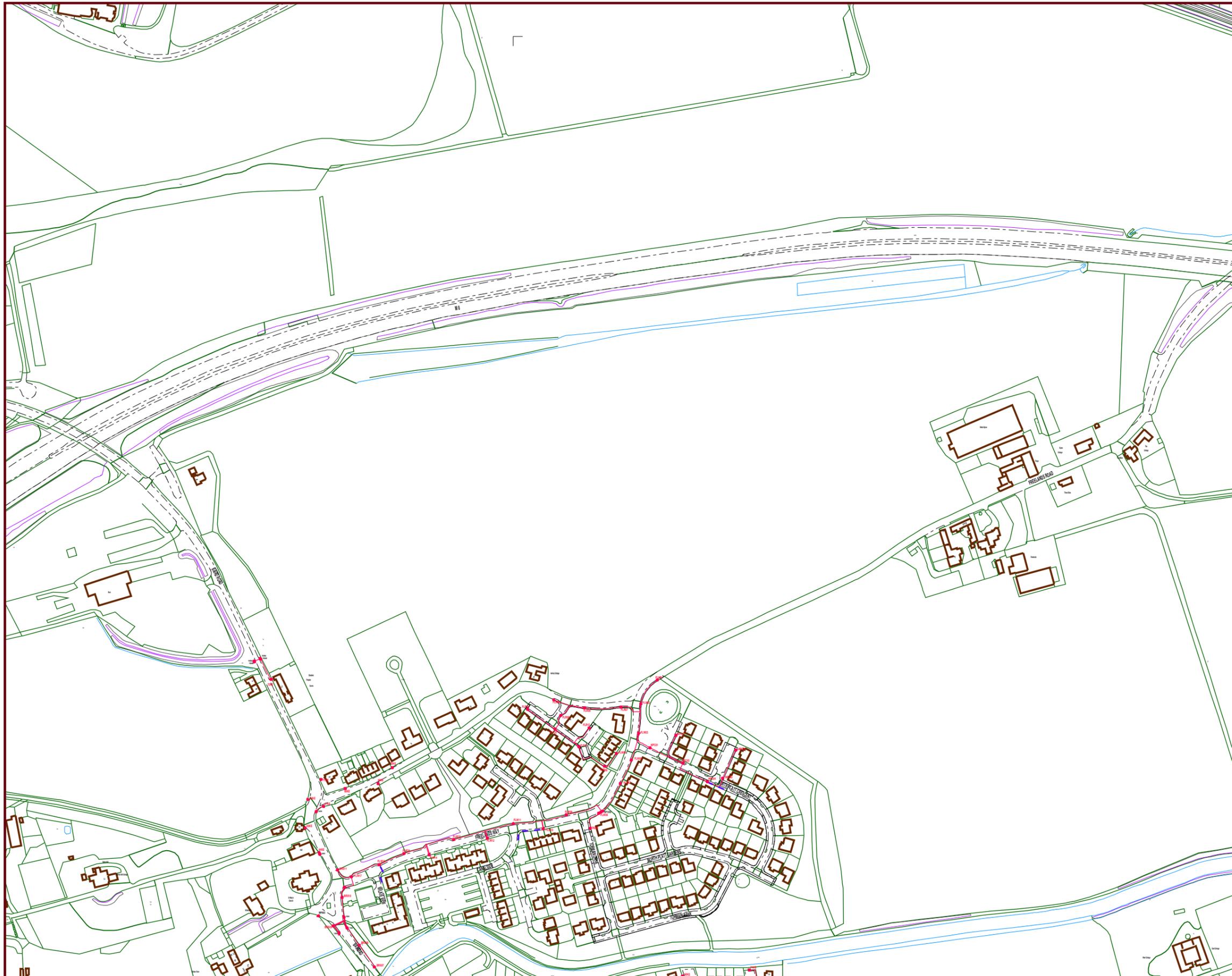
Please find enclosed a plant enquiry for your attention.

**We request plans showing the location of your company's affected plant in relation to the entire site area shown within the boundary on the attached map. Grid references and postcodes relative to the site boundary are provided on the attached map to help you locate the site.**

Within your response please quote our reference number and the name of the site shown above. If you do not have any apparatus in this area, please could you send written confirmation to declare that no apparatus is affected. Please also include information relating to the use and location of Radio Frequency Identification Devices (RFIDs) where available.

**It would be greatly appreciated if you could respond to this enquiry by 21/08/2019.** Your prompt response will assist with our clients proposals in your interests of plant protection.

NOTES



-  Cabinet
-  Mini Pillar
-  Wall Box
-  Cable Underground
-  Cable Surface
-  Empty Ducting
-  Bollard - Illuminated
-  Bollard - Non Illuminated
-  Lit Sign
-  Street Light - Bulkhead
-  Street Light - Lamp Post
-  Street Light - Railing
-  Street Light - Wall Bracket

Colours

-  Current
-  Private and Misc.
-  Archive

 Produced using Smallworld GIS



2<sup>nd</sup> September 2019

Indev Consult  
Duart  
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**SCOTTISH WATER**

Development Operations  
The Bridge  
House  
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Stepps  
Glasgow  
G33 6FB

Development Operations  
Free phone Number - 0800 389 0379  
E-Mail - [developmentoperations@scottishwater.co.uk](mailto:developmentoperations@scottishwater.co.uk)  
[www.scottishwater.co.uk](http://www.scottishwater.co.uk)

Dear Zakk Beadle

**EH28 Edinburgh Ratho Baird Road Site at  
Pre-Development Enquiry Application – Network Assessment Required  
Your Ref: PW-19-09  
Our Ref: 781370**

Thank you for your application regarding the above proposed development. Please note our reference number, which should be quoted on all future correspondence.

Following a capacity review we can now confirm the following:

**Assessment of capacity at our treatment works:**

There is currently sufficient capacity in the **Marchbank** Water Treatment Works to service your development.

There is currently sufficient capacity in the **Newbridge PFI** Waste Water Treatment works to service your development.

**Assessment of our network:**

Further studies are required to be carried out to determine if our existing water/sewer network can adequately service the demands of your development or if any mitigation/enhancement work is necessary.

**Water:** A Hydraulic Water Impact Assessment (WIA) is required for a development of this size.

**Wastewater:** A Drainage Impact Assessment (DIA) is required for a development of this size.

A Network Assessment will be required to establish if there is sufficient capacity within the existing infrastructure to accommodate the demands from your development.

**For Information - A member of our Network Impact Assessment Team will contact you in 5 working days to discuss.**

If you have any questions in relation to the network assessment, contact us at [NIAT@scottishwater.co.uk](mailto:NIAT@scottishwater.co.uk)

Scottish Water is committed to assisting development in Scotland and has funding under our current investment period to upgrade our water and waste water treatment works however our regulations from the Scottish Executive for our current investment programme (2015-2021) state that should your development require Scottish Water networks to be upgraded this cost will have to be met by the developer; Scottish Water may contribute towards the cost of these works, including the required study, via Reasonable Cost Contribution regulations.

**Please Note:**

**Infrastructure within boundary**

On review of your application it has been found that there is Scottish Water Infrastructure within the boundary of the proposed development. I have referred your application to the Scottish Water Asset Impact Team to discuss any diversion requirements which may be necessary. You will receive a response from a member of our team in due course. If you have any questions in the meantime you can contact them at [service.relocation@scottishwater.co.uk](mailto:service.relocation@scottishwater.co.uk)

The applicant should be aware that any conflict with assets identified will be subject to restrictions on proximity of construction.

**General Notes:**

Please be advised that Scottish Water will only accept surface water into the combined network under exceptional circumstances. In the consideration of any development, if due diligence has been carried out in fully investigating the available options for surface water drainage and if any of these options is subsequently deemed unreasonable to pursue, the remaining alternative options can then be considered for approval to allow the development to proceed.

Scottish Water's current minimum level of service for water pressure is 1.0 bar or 10m head in the public main. Any property which cannot be adequately serviced using this pressure may require private pumping arrangements installed, subject to compliance with the current water byelaws.

Scottish Water is unable to reserve capacity and connections to the water & wastewater networks can only be granted on a first come first served basis. For this reason we may have to review our ability to serve the development on receipt of an application to connect.

If you have any general questions or require a site visit, please contact our Central Support Mailbox at [DevelopmentOperations@scottishwater.co.uk](mailto:DevelopmentOperations@scottishwater.co.uk) where our Logistics Team will be happy to assist you.

Yours sincerely

**Lisa Lennox**

Development Operations Technical Analyst

[Lisa.Lennox2@scottishwater.co.uk](mailto:Lisa.Lennox2@scottishwater.co.uk)

**Scottish Water Disclaimer:**

***"It is important to note that the information on any such plan provided on Scottish Water's infrastructure, is for indicative purposes only and its accuracy cannot be relied upon. When the exact location and the nature of the infrastructure on the plan is a material requirement then you should undertake an appropriate site investigation to confirm its actual position in the ground and to determine if it is suitable for its intended purpose. By using the plan you agree that Scottish Water will not be liable for any loss, damage or costs caused by relying upon it or from carrying out any such site investigation."***



**WARNING**  
GAS IN PLOT AREA



NORMAL DEPTH TO THE TOP OF THE CABLE WHEN LAID

	services	l.v.	h.v.	e.h.v.
FOOTPATH	0.40m	0.45m	0.60m	0.75m
ROAD CROSSING	0.60m	0.60m	0.75m	0.90m
l.v./services	- up to 1000V.			
h.v.	- over 1000V. to 11,000V.			
e.h.v.	- 22,000V. to 132,000V.			

**WARNING**

There may have been subsequent alterations to the surface levels. Trial holes must be taken to determine positions and depth of cables. HS (G) 47 Booklet, from the Health and Safety Executive - Avoiding Danger from Buried Cables - should be consulted before commencing excavation work. (available from the HSE)

WHEN WORKING IN THE VICINITY OF OVERHEAD LINES THE HEALTH AND SAFETY GUIDANCE NOTE G56 SHOULD BE CONSULTED. (AVAILABLE FROM THE HSE)

BASED UPON THE ORDNANCE SURVEY MAP WITH THE SANCTION OF THE CONTROLLER OF H.M. STATIONERY OFFICE. CROWN COPYRIGHT RESERVED.

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Mapping Services Unit  
01256 337294

**CHECKED**

Grid Ref: NT14557148  
Scale: 1:1250  
Date: 19/08/2019



**Land at Norton Mains, North Ratho  
Edinburgh City Plan 2030**

**Transport and Access Appraisal**

**March 2020**

**Prepared for:**

Taylor Wimpey

**Prepared by:**

Transport Planning Ltd  
93 George Street  
EDINBURGH  
EH2 3ES

[www.tranplanworld.co.uk](http://www.tranplanworld.co.uk)

---

<b>Contents</b>	<b>Page</b>
<b>1. INTRODUCTION</b>	<b>1</b>
Background	1
Report content	1
<b>2. EXISTING TRANSPORT NETWORK</b>	<b>2</b>
Introduction	2
Pedestrians and cyclists	2
Bus services	5
Existing road network	5
Summary	7
<b>3. POTENTIAL FOR DEVELOPMENT ON SITE</b>	<b>8</b>
Introduction	8
Development access	8
<i>Pedestrians</i>	8
<i>Cyclists</i>	8
<i>Public transport</i>	8
<i>Road access</i>	9
Other matters	9
Response to CEC comments	10
Summary	11
<b>4. SUMMARY AND CONCLUSIONS</b>	<b>12</b>
Summary	12
Conclusion	12

## **APPENDICES**

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## 1. INTRODUCTION

### Background

- 1.1 Taylor Wimpey intends promoting land in Ratho for residential development for inclusion in City of Edinburgh Council's (CEC's) new Local Development Plan (LDP), City Plan 2030. Figure 1 in Appendix A shows the location of the proposed allocation site, which is currently farmland and is located to the east of Baird Road and north of Freelands Road.

### Report content

- 1.2 This access appraisal report considers the proposed allocation site in terms of its existing and potential accessibility. Following this introduction, the remainder of the report will consider the following:
- Existing Transport Network: describes the existing transport infrastructure in and around the site; and
  - Potential for Development on site: provides information on the development area in terms of its likely links to the existing transport network, any associated transport infrastructure that may be required and the travel matters surrounding the development.

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## 2. EXISTING TRANSPORT NETWORK

### Introduction

- 2.1 This section of the report describes the existing transport network around the proposed allocation site. The transport network has been considered in the order of the hierarchy stated in Scottish Planning Policy (SPP), namely: pedestrians, cyclists, public transport and private car.
- 2.2 Figure 2 in Appendix A illustrates the transport network around the proposed allocation site and a map from CEC's 'Explore Edinburgh on foot and by bike' series in Appendix A provides further detail. The site is bounded to the north by the M8 motorway, to the east and south by Freelands Road and to the west by Baird Road.

### Pedestrians and cyclists

- 2.3 There is a footway on the eastern side of Baird Road as it passes the proposed allocation site. This footway continues northwards into Ratho Station and southwards into Ratho. The footway to the south would provide a link to facilities within Ratho, such as Ratho Primary School (around a 10-minute walk (750m) from the southwestern corner of the proposed allocation site), the Post Office (around a nine-minute walk (700m) from the southwestern corner of the proposed allocation site) and Ratho Medical Centre (around a 12-minute walk (around 1.1km) from the southwestern corner of the proposed allocation site).



*Footway on eastern side of Baird Road.*

- 2.4 The Scottish Executive's (as was) document 'Planning Advice Note (PAN) 75 Planning for Transport' states that 'A maximum threshold of 1600m for walking is broadly in line with observed travel behaviour' for accessibility to local facilities by walking and cycling. All of the above facilities are closer than 1,600m.
- 2.5 CEC's free home to school transport criteria apply to those pupils who are attending their catchment school and the distance of their main residence from school is over two

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miles for primary school pupils or three miles for secondary school pupils. The proposed allocation site is within the two-mile criterion for access to Ratho Primary School. The proposed allocation site falls within the catchment of Balerno Community High School, which is further than three miles from the proposed allocation site and so pupils would qualify for free school transport.

- 2.6 The footway to the south also provides a link to Core Path CEC15 which runs alongside the Union Canal. This path also forms part of National Cycle Network (NCN) 754 which runs from Clydebank to Edinburgh. This path provides a route to Edinburgh Park and it would be around an 18-minute cycle (around 6.3km) from the proposed allocation site to Edinburgh Park railway station for example.



*Core Path CEC15 and NCN 754*

- 2.7 A local path runs from the western side of Baird Road, opposite its junction with Freelands Road, and runs westwards. A branch routes back to Baird Road immediately to the south of where it crosses the M8 motorway, while the remainder continues westwards to meet the path alongside the Union Canal around 1.8km to the west.



*Route of local path*

- 2.8 There is a footway on the southern side of Freeland Road for the first 30m or so east of its junction with Baird Road. A remote footpath then restarts on the southern side around 50m further east for around 100m eastwards alongside some recently constructed homes. There is no further section of footway on the southern side of Freeland Road until it meets Freeland Way. There is a footway on the northern side of Freeland Road from its junction with Baird Road eastwards for around 100m. There is no footway on either side of Freeland Road as it passes the proposed allocation site east of its junction with Freeland Way.



*Remote footpath on southern side of Freeland Road.*

- 2.9 There are footways on each side of Freeland Way from its junction with Freeland Road to its junction with Baird Road. These footways link with footways on the roads leading from Freeland Way and include a route to the path alongside the Union Canal forming CEC15 and NCN 754. A further path runs northwards from Freeland Way meeting Freeland Road around 130m east of its junction with Baird Road.



*Path linking Freelands Road with Freelands Way.*



*Footways on Freelands Way.*

### **Bus services**

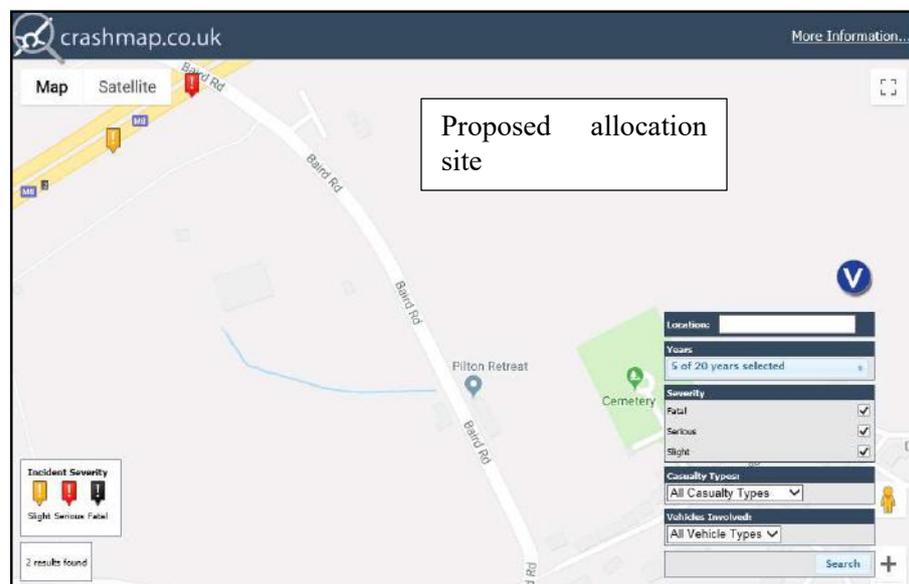
- 2.10 The nearest bus stops to the proposed allocation site are on Baird Road around 230m to the north of the proposed allocation site and around 260m to the south of the junction with Freelands Road. At the time of writing, these stops are served by Lothian Buses' 20 service which links Ratho with Gyle Centre, Edinburgh Park station (for interchange with train and tram services), Westside Plaza, Kingsknowe, Slateford and Chesser. It operates every 30 minutes Monday to Saturday daytime. In the evenings and all day on Sundays it operates hourly between Ratho and Edinburgh Park.

### **Existing road network**

- 2.11 Baird Road is a single carriageway road with one lane in each direction. It links Ratho

with Cliftonhall Road at Newbridge and provides a link to the A8 at Ratho Station. It is subject to a 24-tonne weight restriction as it passes over the Union Canal. It is governed by a 60mph speed limit along the northern part of the frontage of the proposed allocation site, which reduces to 30mph as it enters the built-up area of Ratho and then reduces further to 20mph at the junction with Freelands Road.

- 2.12 Freelands Road is a single-carriageway road with one lane in each direction. Access for vehicles is prohibited at its junction with Baird Road. It is subject to a 20mph speed limit and forms a priority junction with Freelands Way around 350m east of Baird Road. East of that point, it provides a route towards Gogarburn.
- 2.13 Freelands Way is also a single carriageway road with one lane in each direction. It is also subject to a 20mph speed limit and forms a route between Freelands Road and Baird Road and provides access to a residential development.
- 2.14 Data from the Crashmap website shows no injury-causing accidents on Baird Road or Freelands Road near to the proposed allocation site during the period 2014 to 2018.



*Extract from Crashmap of Baird Road.*



*Extract from Crashmap of Freeland Road.*

### **Summary**

- 2.15 The above has shown that the proposed allocation site is located adjacent to existing footways and can access the Core Path and NCN networks. Access to bus services is also available.

---

### 3. POTENTIAL FOR DEVELOPMENT ON SITE

#### **Introduction**

- 3.1 This section of the report provides initial comments on potential access to the proposed allocation site as well as responding to comments made by CEC in their ‘Housing Study’ report of January 2020, which forms part of a suite of background documents to the 2030 City Plan.

#### **Development access**

##### ***Pedestrians***

- 3.2 Pedestrian access to the proposed allocation site could be provided by linking with the footways on the eastern side of Baird Road as they pass the proposed allocation site. A footway could also be provided along the northern side of Freelands Road where it forms the boundary of the proposed allocation site.



*Footway could be provided along northern side of Freelands Road.*

##### ***Cyclists***

- 3.3 Cyclists would be able to utilise all of the new pedestrian and vehicle accesses. Internally, cycle and foot links can be planned into the site layout and these would provide further opportunities for cycle use and informal recreation.

##### ***Public transport***

- 3.4 It may be possible to site additional bus stops on Baird Road where the proposed allocation site fronts it which would improve access to the existing bus services. It may also be possible to reroute the existing bus service from Baird Road through the proposed allocation site, then onto Freelands Road and Freelands Way to resume its current route along Baird Road. The standard of road along Freelands Way appears suitable to allow two-way bus access and the roads within the proposed allocation site

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could be constructed to a suitable standard.

### **Road access**

3.5 A series of drawings in Appendix B show several locations where access could be provided to the proposed allocation site. Accesses could be provided at more than one of these locations to provide permeability to any development on the proposed allocation site. Indeed, more than one access may be required depending on the size of any development proposed. We comment on the access options below.

- Sketch TP644/SK/000 is a key plan showing the general location of the access points.
- Sketch TP644/SK/001 shows a priority junction on Baird Road on the northern part of the frontage of the proposed allocation site. This part of Baird Road is currently subject to a 60mph speed limit, but that could be reduced to 30mph as part of any development on the proposed allocation site with appropriate visibility splays provided.
- Sketch TP643/SK/003 shows a priority junction on Freelands Road around 70m to the east of its junction with Freelands Way. This section of Freelands Road is currently subject to a 30mph speed limit, although a 20mph speed limit starts between this location and the junction with Freelands Way and could be extended eastwards to encompass the proposed access. A new footway is shown on the northern side of Freelands Road linking the proposed access with the existing footway on Freelands Way.

3.6 There is a degree of flexibility on the exact location of the access points, and the locations could be better-defined as work progresses.

### **Other matters**

#### **Vehicle parking**

3.7 The proposed allocation site is within Zone 3 for the purposes of interpreting CEC's parking standards. Those standards state a maximum of one parking space per one- or two-roomed home, 1.5 spaces per three-roomed home and two spaces per four-roomed home (and any home with more than four rooms).

#### **Electric Vehicle charging**

3.8 CEC's parking guidance also suggest one in six parking spaces be equipped for electric vehicle charging. The standards also state "For dwellings with a driveway/garage, passive provision should be made so that a charge point can be added in the future i.e. a 7 kw socket".

#### **Cycle parking**

3.9 CEC's parking standards also state one cycle space should be supplied per one-roomed home, two spaces per two- or three-roomed home and three per four-roomed home (and any home with more than four rooms).

### **Car club**

- 3.10 There are currently no Enterprise Car Club cars in Ratho and a contribution towards one may be sought.

### **Contribution zones**

- 3.11 The proposed allocation site is not within the Edinburgh Tram contribution zone but it is within the current Calder and Hermiston contribution zone. CEC's 'Developer Contributions & Infrastructure Delivery' document of August 2018 provides no details on these contributions, saying only 'details of action and cost still to be established.'

### **Response to CEC comments**

- 3.12 CEC produced a Housing Study document in January 2020 to inform the preparation of the Main Issues Report (MIR) for the City Plan 2030. The study provides an assessment of potential development sites against various criteria.
- 3.13 Land forming the proposal allocation site is included in the assessment as part of a wider area referred to as Norton Mains. CEC's assessment of the site against the transport criteria is summarised in Table 3.1 below along with our comments.

**TABLE 3.1 – CEC TRANSPORT CRITERIA ASSESSMENT AND RESPONSE**

<b>Criterion</b>	<b>CEC Assessment</b>	<b>Response</b>
Does the site support travel by foot to identified convenience services?	Yes – The site is within walking distance of local convenience services.	Agreed
Does the site support travel by foot to identified employment clusters?	Partially – The site is within walking distance of employment clusters but access is impeded by the poor walking environment along Freeland Road, which forms a barrier to the Airport/IBG employment cluster.	The walking environment along Freeland Road could be improved where land bordering it is under the promoters' control or forming part of the adopted road.
Does the site have access to the wider cycle network?	No – The site does have access to the wider cycle network but access is impeded by the Union Canal cycle path which is considered at capacity. Access is unlikely to be improved as capacity cannot be improved here and no other suitable potential cycle route interventions have been identified which could serve the site.	No evidence is provided to support the assertion that the cycle path along the Union Canal is considered at capacity. Sustrans have advised that they haven't received any complaints regarding this section. The proposed A71 cycle super highway may provide an alternative route to the cycle path alongside the Union Canal.
Can the site support active travel overall through appropriate intervention?	No – The site would not support active travel overall, as access to the wider cycle network is poor and it is unlikely to be improved through an identified intervention.	As above, no evidence is provided to support the assertion that the 'wider network is poor' and the proposed A71 cycle super highway may provide an alternative route to the cycle path alongside the Union Canal.
Does the site support travel by public transport through existing public transport network	No – The site does not support travel by public transport based on existing or incrementally	Bus service 20 passes the western boundary of the proposal allocation site on Baird Road and stops could be located

Criterion	CEC Assessment	Response
accessibility and capacity?	improved provision.	along the frontage of the proposed allocation site. This service is subsidised by CEC and development in the area could generate additional patronage which could reduce the funding required by CEC. Similarly, developer contributions to support current or enhanced bus services could reduce CEC subsidy requirements
Is the site potentially served by an identified public transport intervention project which is deliverable in the plan period to serve and accommodate development?	No – The site does not support travel by public transport based on an identified intervention.	The 20 bus service allows interchange with the tram at Edinburgh Park and would allow interchange with the extension to the tram safeguarded under policy T1 of the LDP.

3.14 As shown in Table 3.1 above, we consider CEC’s assessment of the wider area including the proposed allocation site to be either not supported by evidence or unduly pessimistic.

**Summary**

3.15 The proposed allocation site is capable of extending and connecting with the existing footway network. Cyclable alternatives also exist for travel from the site. There are options to provide vehicle accesses on Baird Road and Freeland Road and these would enable bus services to route through the proposed allocation site.

3.16 Other matters such as parking standards etc can be met and made in line with the extant standards at the appropriate time.

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## **4. SUMMARY AND CONCLUSIONS**

### **Summary**

- 4.1 We have been appointed to advise on transport related issues associated with the potential allocation in the upcoming CEC LDP of land at Ratho for residential development.
- 4.2 The proposed allocation site is capable of connecting with the existing footway network and will link with Core Path and NCN networks. There are options to provide vehicle accesses on Baird Road and Freelands Road and these could allow a bus service to route through the proposed allocation site.

### **Conclusion**

- 4.3 This report has assessed the transport and access issues surrounding the allocation of the site for residential development and a review of these issues has demonstrated that there are no transport reasons why the site could not be so allocated in the upcoming LDP.

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**APPENDIX A**

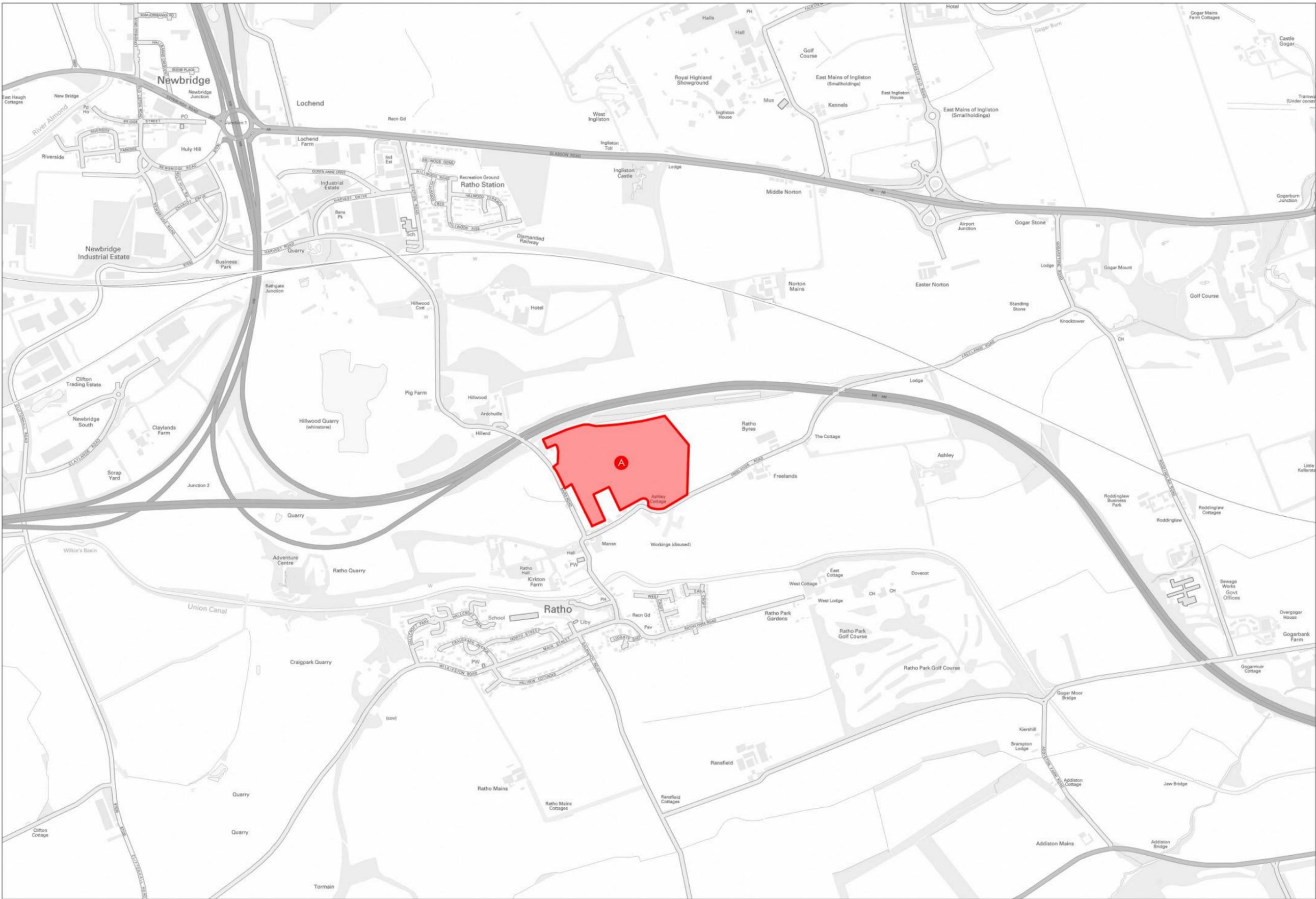
**FIGURES**

**Proposed Residential Development  
Baird Road, Ratho**

Site Location Plan

**Key**

**A** Site of Proposed Development



Proposed Residential Development  
Baird Road, Ratho

Site Location Plan

Taylor Wimpey

Drawing Number:  
TP644 Figure 1

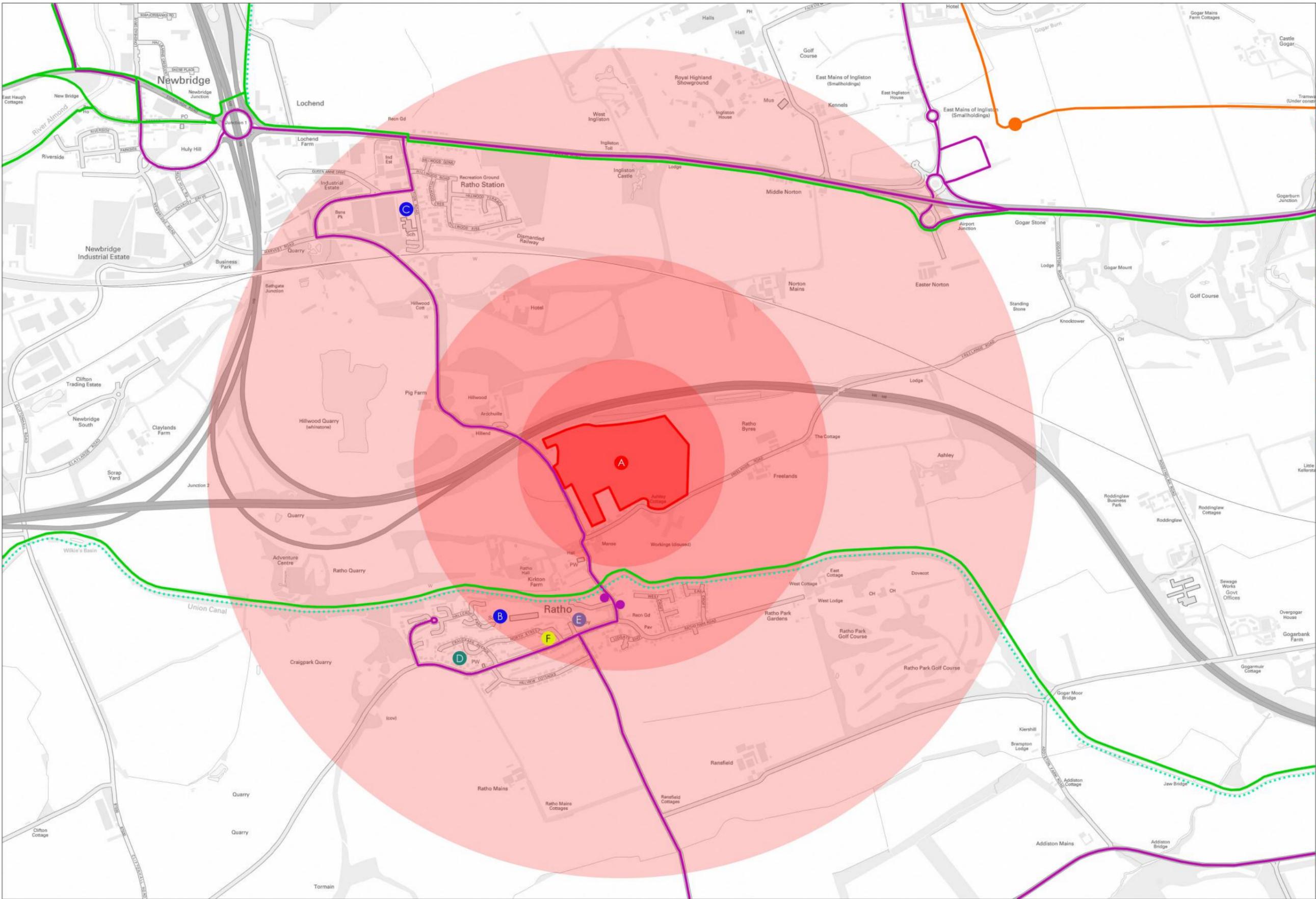
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Aug 2019

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NTS @ A3

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AS





**Proposed Residential Development  
Baird Road, Ratho**

Accessibility Plan

**Key**

- A Site of Proposed Development
- B Ratho Primary School
- C Hillwood Primary School
- D Ratho Health Centre
- E Ratho Library
- F Convenience Store
- Core Path
- - - Cycle Route
- Bus Stop/Route
- Tram Station/Route
- 400m Isochrone from Site
- 800m Isochrone from Site
- 1600m Isochrone from Site



Proposed Residential Development  
Baird Road, Ratho

Accessibility Plan

Taylor Wimpey

Drawing Number:  
TP644 Figure 2

Drawn by:  
NW

Date:  
Aug 2019

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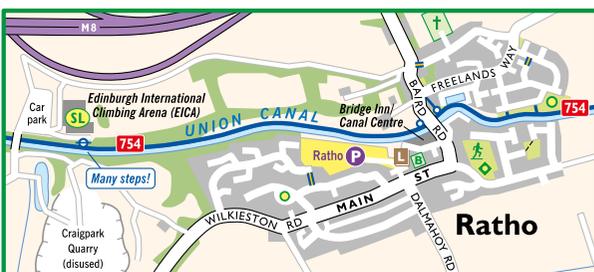
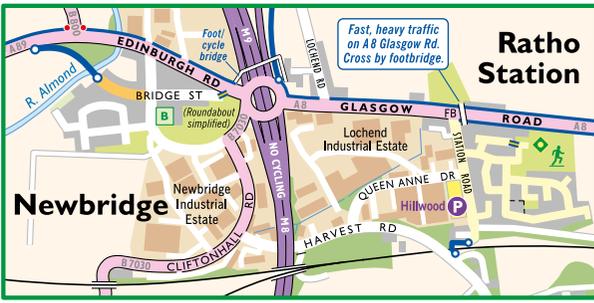
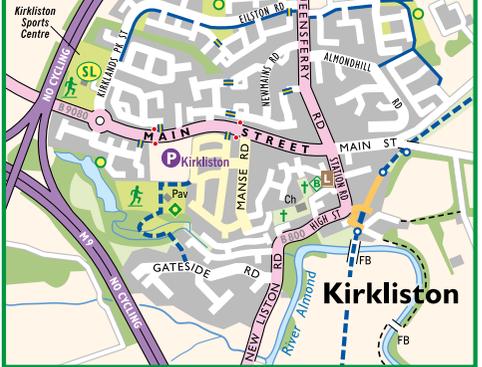
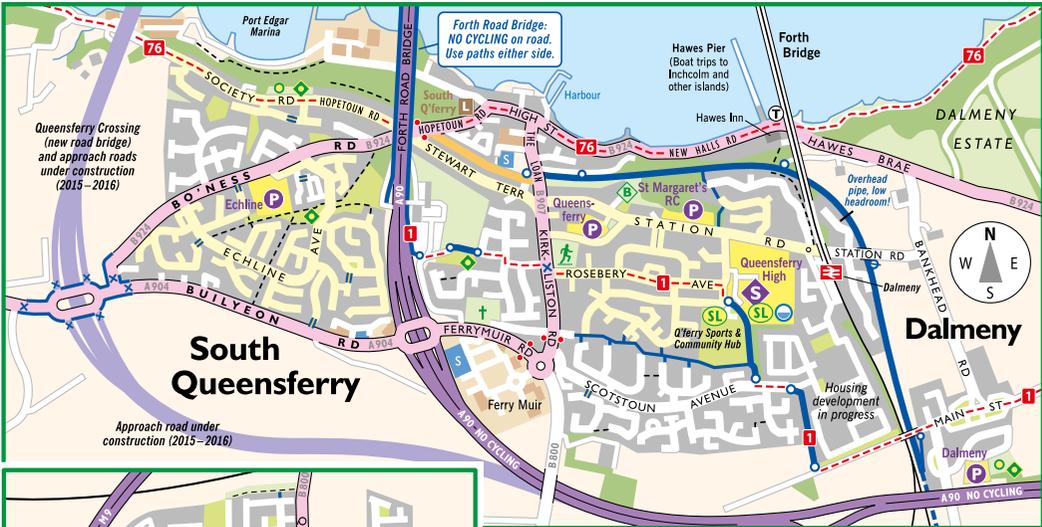
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**APPENDIX B**

**SKETCHES**



## West EDINBURGH

### ROUTES

- Main cycle path, wider, usually better surface
- Access points: level, ramp, steps
- Other cycle path, rough surface or narrower
- Short cut for cyclists, level, with steps
- Traffic-calmed road/ 20 mph zone
- Suggested quieter road link to cycle path
- Informal path
- FB Footbridge
- Main road (Fast or heavy traffic may make cycling conditions uncomfortable)
- Light-controlled pedestrian crossing (excluding traffic lights)
- Pedestrian and cycle crossing (Toucan)
- Railway, station

**Key to town maps**

Town maps shown thus on area map at right

### QuietRoutes

- 12 On path, road
- 12 Crewe Toll–Cramond
- 8 Roseburn–Edinburgh Park
- 9 Roseburn–Newbridge

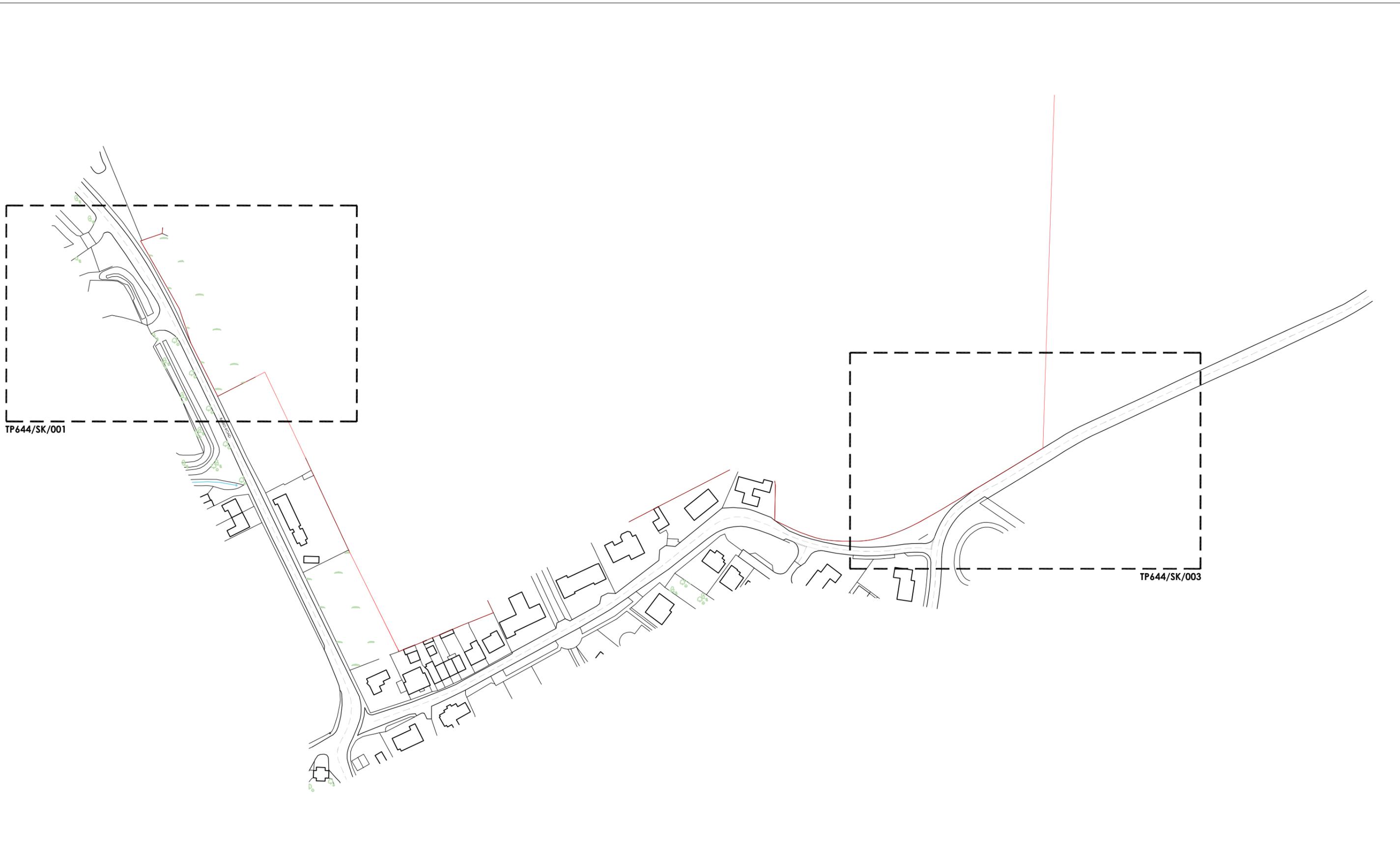
- 1 National Cycle Route (NCR) on path, road
- 1 Queensferry–Musselburgh
- 73 Leith–City Centre–Balerno–Almondell–Livingston
- 73 'Round The Forth'
- 734 Fountainbridge–Ratho–Broxburn–Linlithgow

### Key to area map

- Main cycle path, access points
- Other cycle path
- Informal path
- Access road, track
- Usually quieter road
- Busier main road, (avoid if possible)
- Motorway / M'-way style restrictions. NO CYCLING
- Tram, tram stop
- Railway, station, level crossing
- LC
- Built-up area
- Shopping, superstore
- Business/Industry
- Woodland
- Public parks
- Other green space
- Tennis, bowls
- Playing field
- Allotments
- Golf course
- Cemetery
- Playground: large, small
- Pav CH Pavilion, club house
- Sport/leisure centre
- Swimming pool
- Schools: Primary Secondary Special
- Library
- Public toilets

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TP644/SK/001

TP644/SK/003



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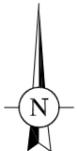
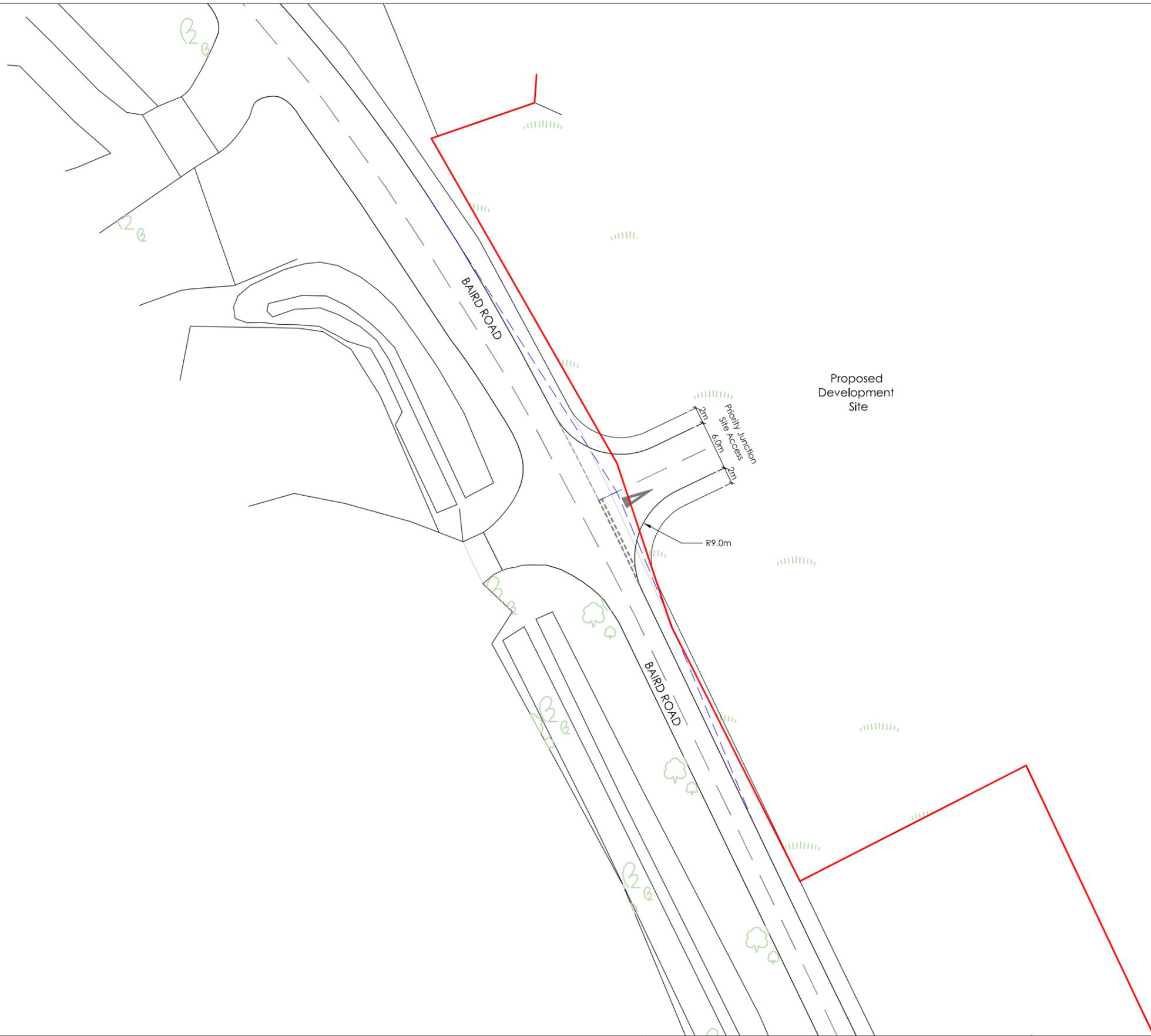
Proposed Residential Development  
 Baird Road, Ratho

Taylor Wimpey

Key Plan - Potential Site Access Options

Drawing Number: TP644/SK/000		Scale: 1:2000 @ A3
Drawn by: NW	Date: Sept 2019	Checked by: AS





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Proposed Residential Development  
 Baird Road, Ratho

Potential Site Access - Option A  
 Priority Junction Layout

Taylor Wimpey

Drawing Number:  
 TP644/SK/001

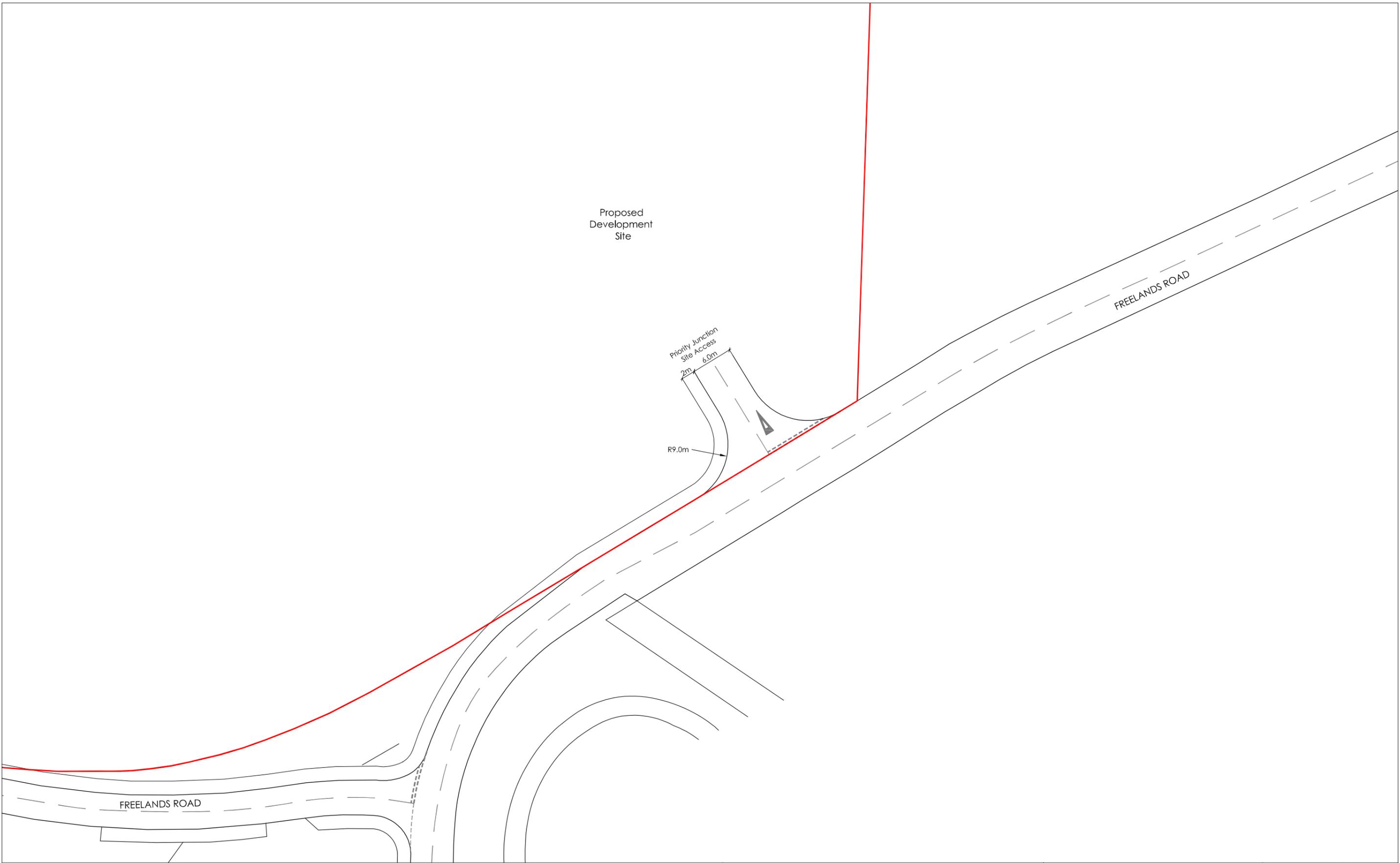
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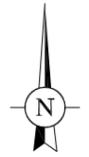
Proposed  
Development  
Site

FREELANDS ROAD

Priority Junction  
Site Access  
6.0m

R9.0m

FREELANDS ROAD



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Proposed Residential Development  
Baird Road, Ratho

Potential Site Access - Option C  
Priority Junction Layout

Taylor Wimpey

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TP644/SK/003

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Sept 2019

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MARCH 2020

# Land at Norton Mains, Ratho

## Response to Choices for City Plan 2030

Iceni Projects Limited on behalf of  
Taylor Wimpey East Scotland

March 2020

ICENI PROJECTS LIMITED  
ON BEHALF OF TAYLOR  
WIMPEY EAST SCOTLAND

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**Land at Norton Mains, Ratho**  
RESPONSE TO CHOICES FOR CITY PLAN 2030

# CONTENTS

1.	INTRODUCTION.....	1
2.	SITE & SURROUNDINGS .....	3
3.	DEVELOPMENT OPPORTUNITY .....	4
4.	RESPONSE TO GREENFIELD SITE ASSESSMENT .....	7
5.	CONCLUSION .....	15

# 1. INTRODUCTION

- 1.1 This statement has been prepared by Icen Projects on behalf of Taylor Wimpey East Scotland. It should be read in conjunction with Taylor Wimpey's representations to the Choices for City Plan 2030 consultation which have been submitted via the online survey.
- 1.2 This statement and associated documentation (as noted below) responds to Question 12C - *Do you have a greenfield site you wish us to consider in the proposed Plan?*
- 1.3 For the reasons presented in the following sections we consider that the land at North Ratho ("the site") should be allocated for housing development within City Plan 2030.
- 1.4 In support of this, the statement provide details of the site, the development opportunity it presents and justification for its proposed allocation within City Plan 2030. This includes specific analysis of and commentary on the 'Greenfield Site Assessment' as presented by the City Plan 2030 Housing Study (Part 2b, p 249).
- 1.5 This statement has been informed by specialist studies which accompany this submission. These include:
- Development Framework (OPEN)
  - Transport and Access Appraisal (Transport Planning Ltd)
  - Engineering Desktop Report (Indev Consulting)
- 1.6 Taylor Wimpey notes that Choices for City Plan 2030 advocates an urban area approach to the delivery of new homes during the plan period (to 2032). This ambitious but highly speculative preferred option seeks to deliver 17,600 homes within the urban area.
- 1.7 Its success is dependent upon a range of commercial factors largely out with the Council's control and the consultation document recognises that *"this approach may not be financially viable"* and will *"require a significant CPO programme to ensure land comes forward"*. It is notable that of the 275 hectares of urban land identified as potentially suitable for housing-led development, only 11 hectares is vacant and ready for development whilst only 30 hectares benefit from planning permission. The remainder of the land is currently in active alternative use.
- 1.8 The deliverability of these sites does not appear to have been considered in the Housing Study. Important basic information about the sites is apparently unknown including who owns them and whether the owner is interested in selling / developing the site. Despite this lack of information, the preferred option relies upon these sites delivering 16,900 new homes between 2019 and 2032.

- 1.9 The priority given to urban as opposed to greenfield land is recognised as a means of making efficient use of existing infrastructure and services. However, given the significant challenges adoption of the ‘urban area’ approach presents to the delivery of new homes during the City Plan period, Taylor Wimpey believe that an alternative option must be pursued if Edinburgh’s housing need and demand is to be met.
- 1.10 In response to Question 12A, Taylor Wimpey has presented an Alternative Option 3. Whilst still proposing a ‘blended approach’ requiring a mix of urban area and greenfield land, a more reasonable and realistic assumption for delivery from new brownfield sites within the plan period is suggested (6,000 homes), alongside the 27,900 homes envisaged on the large-scale greenfield sites identified by the Choices document, and supplemented by additional greenfield sites – such as Ratho North.
- 1.11 North Ratho represents an appropriate candidate for green belt release. It offers a sustainable settlement expansion opportunity with a net developable area of approximately 8.5ha. It is considered that North Ratho can make an important contribution to the delivery of new homes and the ongoing maintenance of an effective 5-year housing land supply during the City Plan period.

## 2. SITE & SURROUNDINGS

- 2.1 The proposed development site extends to 16 ha and is located on the north-eastern edge of Ratho adjacent to the existing settlement boundary. It comprises agricultural land.
- 2.2 It is bound to the north by a mature woodland belt which provides separation and a degree of enclosure from the M8 motorway beyond. The southern boundary is largely defined by Freelands Road, the exception being the south west of the site which is marked by Ratho cemetery and a row of residential properties. The proposed development area wraps around the Cemetery.
- 2.3 Farmland extends to the east of the site, and the site is bound to the west by Baird Road which connects the site to Ratho.
- 2.4 Beyond Freelands Road to the south there is a large modern residential development (developed by CALA homes) which is generally focussed around Freelands Way and Ratho Marina.
- 2.5 In terms site topography, the landform ranges from 60m AOD up to 75m AOD with the highest point located towards the western edge of the site. From this point there is a gradual slope towards the eastern boundary where the lowest point sits. The slope from the high point down towards the western boundary on Baird road is more obvious. Topography analysis highlights the relatively low height that the site sits in relation to the surrounding context to the south, west, and north
- 2.6 The site's overall character, although in agricultural use, is heavily influenced by the urban edge of Ratho and the adjacent M8 motorway, affording Ratho North an 'urban fringe' character.
- 2.7 Ratho benefits from a number of local facilities. Local shops include a Post Office, Village Shop and pharmacy. Local community facilities include a Primary School, library, community centre and a recently built medical centre.
- 2.8 The site is well situated to access these facilities with Ratho Primary School located approximately 750m from the southwest corner of the site, the Post Office around 700m and Ratho Medical Centre around 1km. All of these facilities can be accessed on foot via an existing footway which runs along the eastern side of Baird Road.

### 3. DEVELOPMENT OPPORTUNITY

#### Development Framework

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- 3.1 Ratho North is being promoted as a sustainable settlement expansion.
- 3.2 The site offers an opportunity to create a new north-eastern edge to the settlement, continuing the pattern of growth established by the CALA Homes development at Ratho Marina and Freelands Way.
- 3.3 The Development Strategy proposed has been informed by analysis of landscape context, topography and landform, views, site features, initial site investigations and a transport and access appraisal.
- 3.4 The resulting Development Framework document supports this submission. It has identified appropriately located development parcels within the site, providing a net development area of 8.5 ha in total. The site's indicative development capacity is 350-400 units. Access to the site can be achieved from two points - Freelands Road and Baird Road.
- 3.5 The street network proposed is designed in accordance with Edinburgh Design Guidance (October 2018) principles. It works with the existing topography - the primary route follows the landform around the high point of the site and links the two access points. Secondary streets branch off the primary route to serve the development parcels which also work with existing landform.
- 3.6 Pedestrians and cyclists will use the street network but other path connections are provided through the areas of open space within the site. Pedestrian access points into the site are provided from Baird Road and from Freelands Road, with the access point on Baird's Road providing a direct pedestrian link to bus stops, and local shops in Ratho.
- 3.7 The existing woodland belt on the eastern edge of the CALA development to the south has been extended along the eastern edge of the site helping to mitigate views from the east.
- 3.8 A significant amount of open space has been provided, primarily in the south western part of the site. This area has been reserved for community use and to reduce the impact of the proposed development on the existing housing, the Pilton Retreat Charitable Trust and cemetery on Freelands Road.
- 3.9 The high point in the site has been retained as open space to provide views out from the site but also mitigate the views of development from the east. A landscape buffer wraps round the east and northern boundary with a pedestrian link around the edge of the site.

- 3.10 The development parcel on the eastern edge of the site will overlook this areas of landscape. Included in this buffer is a SUDs basin at the low point in the north east of the site which would also be overlooked by adjacent properties.
- 3.11 Although the site is located on the edge of the Ratho Conservation Area, it is well screened and views to and from the Conservation Area are limited. Nevertheless, Taylor Wimpey are mindful of this and the proposed development will seek to respect its setting and complement its special character with a high level of design, which utilises appropriate materials.
- 3.12 Overall, the Development Framework presents a well-considered, realistic and deliverable concept for a sustainable and integrated settlement expansion of Ratho. As demonstrated, the application site represents an effective site capable of accommodating residential development in line with housing land policy objectives. Its development would be progressed in a logical, sustainable and sensitive manner, consolidating the overall settlement pattern and affording Ratho an improved, robust and defensible Green Belt boundary

#### **Site Effectiveness**

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- 3.13 PAN2/2010: Affordable Housing and Housing Land Audits contains specific criteria for the assessment of a site's 'effectiveness'. Ratho North's effectiveness, when considered against these criteria, can be summarised as follows:

**Ownership:** Taylor Wimpey controls the land. Upon securing an LDP allocation an application for planning permission can be expected in the short-term, resulting in development during the Plan period.

**Physical:** There are no physical constraints that would undermine the site's viability for development. There are no constraints in terms of ground conditions. There are no historic records of mine or mineral workings and the risk of contamination is negligible.

**Public Funding:** No public funding would be required to make residential development viable – this is an effective housing site controlled by a developer.

**Deliverability:** There are no delivery constraints affecting the site, the strength of Ratho as a desirable housing location will ensure the delivery of housing within the plan period.

**Infrastructure:** There are no infrastructure constraints. Water supply, drainage, education capacity, electricity and telecoms are all either available or can be provided by the developer.

**Use of Land:** Housing (private and affordable) will be the primary use of the land.

3.14 In short, the site is considered to be effective when assessed against the PAN 2/2010 criteria. Taylor Wimpey are committed to the delivery of this site, subject to its allocation within the emerging Local Development Plan, and any planning application requirements

## 4. RESPONSE TO GREENFIELD SITE ASSESSMENT

- 4.1 This section provides commentary on and responds to the 'Greenfield Site Assessment' presented by the City Plan 2030 Housing Study (Part 2b, p 249).
- 4.2 At the outset, it should be noted that the Council's 'Norton Mains' site assessment encompasses all of the land to the north of Freelands Road. The assessment area covers a larger area than that which is being promoted by Taylor Wimpey.
- 4.3 The conclusion of the Council's Site Assessment is that *"the site is not suitable for development due to its poor accessibility, community infrastructure capacity and visually prominent landscape"*.
- 4.4 Taylor Wimpey disagree with this conclusion and the analysis provided under a number of the assessment criteria which has informed it. It is considered that the assessment significantly overstates a number of key criticisms and is based upon a 'broad brush' approach which is not supported upon detailed analysis.
- 4.5 Taylor Wimpey response to the Site Assessment is presented below:

### **SDP1 SDA AREAS**

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

- 4.6 It is accepted that the site is not within an identified Strategic Development Area.

### **ACTIVE TRAVEL**

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

- 4.7 We agree with the Council's view that the site is within walking distance of local convenience services, this is clearly evidenced by information provided in support of this representation.
- 4.8 Planning Advice Note (PAN) 75 Planning for Transport' states that *'A maximum threshold of 1600m for walking is broadly in line with observed travel behaviour' for accessibility to local facilities by walking and cycling'*. All key local facilities are situated within 1,600m from the site.

***Does the site support travel by foot to identified employment clusters?***

- 4.9 We note the Council's view that the site 'partially' supports travel by foot to identified employment clusters on the basis that it is within walking distance of the Airport/IBG employment cluster but access is impeded by the poor walking environment along Freeland's Road.
- 4.10 We agree that the site is within walking distance of the Airport/IBG employment cluster. We would note that the potential exists to enhance the walking environment along Freeland's Road where land bordering it is under the promoters' control or forms part of the adopted road.

***Does the site have access to the wider cycle network?***

- 4.11 We disagree with the Council's suggestion that the site does not have access to the wider cycle network. It is suggested that the site's access to the Union Canal is impeded, the Union Canal is at operational capacity and there are no potential cycle route interventions that serve the site.
- 4.12 The site's access to the wider cycle network is not impeded. The footway to the south of the site provides a link to Core Path CEC15 which runs alongside the Union Canal. This path forms part of National Cycle Network (NCN) 754 which extends between Clydebank and Edinburgh. This path provides a route to Edinburgh Park. It is around an 18-minute cycle (around 6.3km) from the proposed allocation site to Edinburgh Park railway station for example, where it is possible to transfer to tram or train (both with bikes) to travel into the city centre.
- 4.13 No evidence is provided to support the assertion that the cycle path along the Union Canal is considered at capacity. Having undertaken our own investigations, Sustrans have advised that they have not received any complaints in this regard relating to this section of the Union Canal.
- 4.14 The proposed A71 Cycle Super Highway may provide an alternative route to the cycle path alongside the Union Canal. The A71 Cycle Super Highway proposal represents a key strategic link in the region's network – linking South Livingston with Balerno, Currie and West Edinburgh. The creation of the A71 Cycle Super Highway is specifically identified as an opportunity within SEStran's 'Strategic Cross Boundary Cycle Development' document (2015) and is a long-held strategic aspiration within the SESplan area.
- 4.15 Given this background, it is disappointing that the Greenfield Site Assessment has failed to recognise and account for what is a significant cycle route intervention.

***Can the site support active travel overall through appropriate intervention?***

- 4.16 For the reasons outlined above, the Assessment's conclusion that *"the site would not support active travel overall, as access to the wider cycle network is poor and it is unlikely to be improved through an identified intervention"* is not justified. No evidence has been provided to support the analysis provided and Taylor Wimpey disagrees with the conclusion.

**PUBLIC TRANSPORT**

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

- 4.17 The nearest bus stops are on Baird Road around 230m to the north of the proposed allocation site and around 260m to the south of the junction with Freeland Road. These stops are served by Lothian Buses No. 20 service which links Ratho with the Gyle Centre, Edinburgh Park station (for interchange with train and tram services), Westside Plaza, Kingsknowe, Slateford and Chesser. It operates every 30 minutes Monday to Saturday daytime. In the evenings and all day on Sundays it operates hourly between Ratho and Edinburgh Park.
- 4.18 The No. 20 service passes the western boundary of the proposal allocation site on Baird Road where additional stops could be located. This bus service is subsidised by CEC and development in the area would generate additional patronage which could reduce the funding required by CEC. Similarly, developer contributions to support current or enhanced bus services could further reduce CEC subsidy requirements.
- 4.19 In light of the above Taylor Wimpey disagrees with the Assessment's conclusion that the site does not support travel by public transport based on existing or incrementally improved provision.

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

- 4.20 We are not aware of any identified public transport intervention project likely to serve and accommodate the development of the site. This submission and associated documentation has already demonstrated that the site is supported by existing public transport provision.

**COMMUNITY INFRASTRUCTURE**

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

4.21 The assessment concludes that the site does not currently have sufficient primary school capacity. Whilst Taylor Wimpey understands that Ratho Primary School does not have the capacity to accommodate the development at present, a number of potential solutions to this situation exist as detailed below at paras 4.20-4.25.

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

4.22 The assessment concludes that the site does not currently have sufficient secondary school capacity. Again, Taylor Wimpey understands that Balerno High School is currently operating at or around capacity however, as below, potential solutions are available to accommodate additional development within the catchment area.

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

4.23 The assessment states that *“the site does not have sufficient community infrastructure capacity to support development and no appropriate intervention has been identified to address this”*. As a result it suggests that both a new primary and new secondary school would be required and concludes that there is *“not enough scope for development on this and nearby sites to support this level of intervention”*.

4.24 Significant education infrastructure interventions have been identified to support potential greenfield housing development proposals identified by Choices for City Plan 2030, including within West Edinburgh, East Riccarton and Kirkliston. This will inevitably involve the introduction of revised school catchment boundaries across West Edinburgh, potentially freeing up of capacity within existing schools.

4.25 Given the clear need for additional greenfield land releases over and above those identified by the consultation document, it is not appropriate to discount sites such as North Ratho for reasons relating to a lack of existing capacity and no appropriate intervention having (yet) been identified.

4.26 Taylor Wimpey notes the previous submission of planning applications for large housing developments within Ratho - notably at Ratho Park Road (Stewart Milne) and Freelands Road (BDW Trading). Whilst neither of these applications were ultimately approved (following appeals) neither were objected to by the Council’s Children and Families Department who confirmed the potential to increase the capacities of both Ratho Primary and Balerno High Schools in order to accommodate children from the proposed developments.

- 4.27 There has been no housing development of note in Ratho since the refusal of these applications. It is understood there remains scope to increase capacity at both Ratho Primary and Balerno High School in response to demand. Taylor Wimpey acknowledge that developer contributions will be necessary to facilitate such enhancements to existing education infrastructure. These should be secured in accordance with Planning Circular 3/2012: Planning Obligations and Good Neighbour Agreements and Taylor Wimpey will work positively with CEC Education in this regard.
- 4.28 Overall, while there may be insufficient education capacity at present to accommodate the site's development capacity can be improved by appropriate interventions which are deliverable within the plan period. Contrary to the conclusion of the site assessment, education capacity does not provide a barrier to the site's release for development.

## **LANDSCAPE CHARACTER**

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

- 4.29 The site assessment considers that the site would be visually prominent in long views from the M8, open sections of the Union Canal and parts of Ratho, and would conflict with the linear settlement pattern of Ratho. On this basis it concludes that the site would not maintain Ratho's identity, character and landscape setting.
- 4.30 The Development Framework which supports this submission is underpinned by a preliminary landscape and visual appraisal which has informed the development strategy proposed by Taylor Wimpey.
- 4.31 The site has an overall elevation that generally sits below the surrounding landform, the exception to this being the land to the east of the site. It is acknowledged that the site is visible from the east, most notably in long distance views from the Union Canal towpath and from the M8 motorway.
- 4.32 The submitted Development Framework considers views towards the site from five separate locations, including from the Union Canal towpath and the M8 motorway.
- 4.33 In terms of views looking west from the Union Canal towpath, the effect of development on this view must be considered in context with CALA's 'Moorings' development to the immediate south of the site which is also clearly visible from this viewpoint. The view of the existing development has been mitigated by the introduction of a woodland belt along its eastern edge which helps contain the development and limit its effect on this view.

- 4.34 This approach would be adopted by Taylor Wimpey within the Ratho North site by continuing the line of the new woodland strip established by the CALA development north across the site to tie in with the belt of mature woodland on the southern boundary of the M8 motorway. The landform behind the site rises up and would serve as a backdrop to any proposed development, with existing mature trees softening this view.
- 4.35 In terms of views looking west from the M8, on approaching the site from the east there is currently a clear view of the site as the landform rises up from east to west. As above, the introduction of a woodland belt along the site's eastern boundary would screen any views of the development within the site. The more visible high point within the site would be kept clear of development and reserved for open space and tree planting to further mitigate the effect on this view. There is no view across the site from the M8 to the north as the existing band of mature trees prevents any direct views into the site, furthermore this section of the motorway is in cut so sits below the proposed site.
- 4.36 In considering views to the site from within Ratho itself, existing housing along Freelands Road and mature trees along Baird Road restrict views into the site from the south and west. Although there is a clear view into the site from Baird Road, there is already development along this road and any new development addressing the road in this area feels like a natural progression. The housing along Freelands Road faces south and therefore backs onto the site. Any views into the site would be from first floor rear windows.
- 4.37 The existing cemetery occupies a high elevation sitting directly south of the high point within the site. Due to this the views of the site from the south are restricted, with the existing stone wall around the cemetery further mitigate the impact on this view. Any proposed development on the site would provide an appropriate landscape buffer to further mitigate the impact on this view.
- 4.38 It should also be noted that because of the surrounding landform, there are no views of the site from the centre of Ratho.
- 4.39 Turning to the suggestion that the site's release for development would conflict with the linear settlement pattern of Ratho. Whilst the original linear form of Ratho is evident, the principle of this has been altered and diluted over time by successive developments, most notably the recent developments to the north-east and west of the village. CALA's Moorings development in particular consolidates the urban form into something less linear and more compact – it reflects current masterplanning principles and certainly could not be considered linear development typical of Ratho's historic development pattern.
- 4.40 It is considered that the continuation of Ratho's expansion in a north-easterly direction, recognising the emerging settlement pattern established by recent development, represents the natural direction for settlement growth.

- 4.41 Overall, it is considered that the Site Assessment's concern regarding the site's visual prominence and supposed conflict with the linear settlement pattern of Ratho have been overstated. Surrounding landform allied to a sensitive design approach and appropriate mitigation measures will assist in achieving a development which maintains the identity, character and landscape setting of Ratho.

## **GREEN NETWORK**

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

- 4.42 Development of the site would avoid any significant loss of landscape-scale land of existing or potential value for the strategic green network. Although the site assessment notes only partial compliance with this criteria due to the site lying adjacent to an area identified as a green network opportunity – understood to be Craigpark Quarry.
- 4.43 Edinburgh's Open Space Strategy "Open Space 2021" identifies the restoration of Craigpark Quarry as an opportunity for a Country Park. Gains in the Green Network through new development is viewed as a positive within the strategy; new development at Ratho North could reflect this by offering a further increase in open space and community provision. Existing local paths provide good connections between Craigpark Quarry, the EICA, and the site. A connected blue-green infrastructure is proposed within the site that links with its context.
- 4.44 Rather than negatively impacting upon the value of the strategic green network the site's development provides an opportunity for green network enhancements via the delivery of open space, green links/footpath network and supplementary tree planting which connects to the alignment of existing woodland resources around the site. Such enhancements would be of significant value to the strategic green network.

## **FLOOD RISK**

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### ***Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?***

- 4.45 We agree with the Site Assessment's conclusion that the site's development would avoid identified areas of medium-high fluvial flood risk or areas of importance for flood management.
- 4.46 The submitted Engineering Report considers matters relating to flood risk in further detail, and confirms that there is no risk of flooding within the areas of the site envisaged for development.

## **SUMMARY**

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- 4.47 As above, the Site Assessment concludes that Ratho North is not suitable for development due to its poor accessibility, community infrastructure capacity and visually prominent landscape.
- 4.48 This statement and its associated documentation has critiqued the Site Assessment and provided sufficient information to demonstrate that in relation to a number of the assessment criteria its conclusions are unjustified and seemingly based on a very broad-brush appraisal process.
- 4.49 Taylor Wimpey has presented a clear development strategy for the site which includes appropriate mitigation measures where necessary. Overall, upon detailed consideration of all key assessment criteria, it can be reasonably be concluded that Ratho North represents a suitable site for development.

## 5. CONCLUSION

- 5.1 Analysis of the Choices for City Plan 2030 document, and in particular its approach to meeting housing need and demand during the City Plan period, indicates that an alternative approach is required.
- 5.2 The priority given to brownfield as opposed to greenfield land is recognised by Taylor Wimpey as a means of making efficient use of existing infrastructure and services. Nevertheless, the preferred approach of seeking to meet Edinburgh's housing need solely on brownfield land is unrealistic and will fail to meet housing need and demand during the plan period.
- 5.3 The evidence clearly indicates that new greenfield sites must be identified and allocated for housing development by City Plan 2030.
- 5.4 This submission and its supporting documentation has demonstrated that Ratho North represents an effective site capable of accommodating residential development in line with housing land policy objectives without prejudicing the purpose or integrity of the green belt around Ratho. The site is capable of delivering much needed housing development within the City Plan period.
- 5.5 The submitted Development Framework presents a considered strategy which will allow development of the site to progress in a logical, sustainable and sensitive manner, consolidating the emerging settlement pattern and affording Ratho an improved, robust and defensible Green Belt boundary.
- 5.6 For the reasons presented by this submission, it is respectfully requested that land at Ratho North be released from the green belt and allocated for housing development within emerging City Plan 2030.

# North Ratho, Land at Norton Mains

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## Development Framework

March 2020





M8 MOTORWAY

BAIRD ROAD

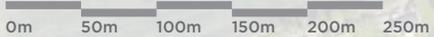
FREELANDS ROAD

FREELANDS WAY

UNION CANAL

Indicative Development Framework

Scale 1:5000 @ A4



# Contents

<b>1</b>	<b>Introduction</b>	<b>p. 7</b>	<b>6</b>	<b>Development Framework</b>	<b>p. 34</b>	<b>List of Figures</b>		
				6.1	The Masterplan	p. 34	fig. 01: Site Aerial	<b>pg. 6</b>
<b>2</b>	<b>Ratho</b>	<b>p. 9</b>		6.2	Development Layout	p. 35	fig. 02: Site Designations	<b>pg. 9</b>
	2.1	Settlement Form	p. 9	6.3	Connections and Movement	p. 36	fig. 04: Site Location	<b>pg. 13</b>
	2.2	Ratho: Place	p. 11	6.4	Green Space Strategy	p. 37	fig. 05: Viewpoint Location Plan	<b>pg. 15</b>
<b>3</b>	<b>The Site</b>	<b>p. 13</b>		6.5	Drainage and Utilities	p. 38	fig. 06: Height Band Analysis	<b>pg. 16</b>
	3.1	Site Description	p. 13	<b>7</b>	<b>Conclusions</b>	<b>p. 41</b>	fig. 07: Slope Analysis	<b>pg. 17</b>
	3.2	Landscape Context	p. 15				fig. 08: Viewpoint Location Plan	<b>pg. 18</b>
	3.3	Topography and Landform	p. 16				fig. 09: Site Features	<b>pg. 21</b>
	3.4	Views	p. 18				fig. 10: Drainage and Utilities	<b>pg. 22</b>
	3.5	Site Features	p. 20				fig. 11: Transport and Accessibility	<b>pg. 23</b>
	3.6	Ground Conditions	p. 22				fig. 12: Site Analysis	<b>pg. 27</b>
	3.7	Drainage and Utilities	p. 22				fig. 13: Character sketch: approach from east to west on Freelands Road (Ratho Gateway)	<b>pg. 28</b>
	3.8	Transport and Accessibility	p. 24				fig. 14: Development Strategy	<b>pg. 29</b>
	3.9	Appraisal	p. 26				fig. 15: Landform Development Strategy	<b>pg. 30</b>
<b>4</b>	<b>The Opportunity</b>	<b>p. 29</b>					fig. 16: Context Analysis	<b>pg. 31</b>
	4.1	Strategy for Development	p. 29				fig. 17: Indicative Development Framework	<b>pg. 33</b>
<b>5</b>	<b>Planning assessment</b>	<b>p. 30</b>					fig. 18: Key Frontages	<b>pg. 35</b>
	5.1	City Plan 2030	p. 30				fig. 19: Connections and movement	<b>pg. 36</b>
							fig. 20: Landscape Development Framework	<b>pg. 38</b>
							fig. 21: Proposed Drainage	<b>pg. 39</b>



# Summary Site Assessment Response

## Introduction

As part of the process for preparing the new Local Development plan for Edinburgh, the City of Edinburgh council has produced the “Choices for City Plan 2030” document which is supported by a number of technical studies. This submission supports the promotion of a site for housing development on the northern edge of Ratho. Within the Council productions the land is considered as part of a wider landholding called “Norton Mains”; the Council does not support this wider land area for allocation.

The Development Framework document assesses the proposed site in terms of its context, the site features, how it is connected and how visible it is. Opportunities for mitigation or for aligning with the Council ambitions are identified. This process has produced a Development Framework plan which offers a logical opportunity for the sustainable growth of Ratho into a consolidated urban form which fits comfortably within the rolling landform.

Fundamental to this has been a review and understanding of the Council assessment process; an analysis of this, insofar as it affects matters of masterplanning and landscape fit, are included within section 5 and are summarised below.

## Landscape and Visual Assessment

Norton Mains, North Ratho, is a part of Landscape Character Area 22 Ratho Farmland. This is then divided up into Council Assessment (CA) areas. The whole of this area south of the M8 was assessed as one within the document, CA5, Norton Mains when in fact it is a much smaller area being promoted by Taylor Wimpey. The Council do not consider that there is scope for development within this area on grounds of:

- the landscape forms part of the hills and ridges enclosing the northern edge of Ratho;
- development conflicts with the distinct linear form of Ratho;
- Visually prominent in long views from the M8, more open sections of the Union Canal, and from parts of Ratho particularly if located on the higher western part of the site.

The response is as follows:

(i) “The landscape forms part of the hills and ridges enclosing the northern edge of Ratho”

Whilst most of the area is characterised by these hills and ridges this also includes Ratho Village itself which doesn't nestle

within the landscape but is built on a ridgeline; clearly visible on the diagram Figure 16 within this document. The high point, of the site at a height of 78m AOD is in fact lower than much of Ratho itself which averages 80m AOD within the traditional core. Keeping the high point of the site clear of development would therefore seem an appropriate response but one which doesn't occlude development of the remaining land.

(ii) “development conflicts with the distinct linear form of Ratho;”

The traditional linear form of Ratho is evident, but the principle of this has already been altered over the past 30 years or so by successive developments. This includes the most recent developments to the north east and to the west of the village. Not only through their masterplan layouts, which are not linear, but the relatively extensive Marina development has had the effect of consolidating the urban form into something which is less linear and more compact.

(iii) “Visually prominent in long views from the M8, more open sections of the Union Canal, and from parts of Ratho particularly if located on the higher western part of the site.”

Regarding visual prominence, this reduced area of development

will not be as prominent from the M8 as anticipated within the Council LVA given the reduction in size. The western part of the site is higher (see Figure 20) but excepting the higher point the land elevation is contiguous with the adjacent Marina development, and in fact lower in part. There will be some visibility of the site from the M8 where Freeland Road passes over it and the screen planting is reduced and also from the eastern extent of the Union Canal, beyond Ratho. By adopting good practice and mitigating through judicious planting and development form, the significance of this can be reduced.

The visual prominence of the landscape is considered to have been over-emphasised within the wider context, especially given the reduced size of the site and that the development impacts can be mitigated against.

## Housing Study

The Council include some of the above points within their Greenfield Site Assessment of Norton Mains within Part 2b of their "Housing Study". The Council is overall negative in their assessment of the site (albeit a much larger area and not the smaller site being promoted within this submission) and includes the comments from the Landscape and Visual Assessment which are answered above. Other points of note relevant to masterplanning, the focus of this response document, in response to some of the comments are as follows.

### (i) Active Travel

Comments on the lack of pedestrian connectivity along Freeland Road toward the International Business Gateway (IBG) can be in part addressed through Taylor Wimpey delivering an appropriate path along the land which they control at Freeland Road allowing the Council to then connect to this to deliver additional sections. The walking distance between IBG and the proposed site is an hour, and cycling takes around 17 minutes. Not many people will walk two hours a day to go to work and return home but there are also other options for those that will:

- Pedestrian connectivity is achieved travelling north up Baird Road and then along a quieter access road path network through Norton House grounds and onto Quiet Route 9 as shown on the West Edinburgh Routes Plan. This is a pleasant walk and takes only just over an hour.
- Pedestrian and cycle connectivity are achieved via Baird Road/ Station Road and Glasgow Road (Quiet Route 9). This has only one small section with no footway albeit the footway could be wider in places. This is a walking route of around 1 hour 20 minutes, and cycling takes 20 minutes.

### (ii) Green Networks

Edinburgh's Open Space Strategy "Open Space 2021" identifies the restoration of Craigpark Quarry as an opportunity for a Country Park. Gains in the Green Network through new development is seen within the strategy as a positive; new development at Norton Mains could reflect this by offering a further increase in open space and community provision. Existing local paths offer good connections between Craigpark Quarry, the EICA, and the proposed development site. A connected blue-green infrastructure is proposed within the site that links with its context.



fig. 01: Site Aerial

# 1 Introduction

This is a submission response to the consultation by Edinburgh Council for the “Choices for City Plan 2030” concerning land at Norton Mains, North Ratho, which is proposed for residential development and community use.

The proposal is on a 16 Ha (39.5 acres) greenfield site controlled by Taylor Wimpey on the northern edge of Ratho, a large village to the west of Edinburgh and connected by the M8. Residential capacity is estimated as 350-400 new homes.

Choices’ is the Main Issues Report for City Plan 2030. It sets out the vision for what Edinburgh will be in 2030, built around four key themes:

- A sustainable city which supports everyone’s physical and mental wellbeing
- A city which everyone lives in a home they can afford
- A city where you don’t need to own a car to move around
- A city where everyone shares in its economic success.

The Choices document is supported by a number of studies and appraisals, including a “City Plan 2030 Housing Study – January 2020” within which Part 2b Greenfield Site Assessment reviews all the potential housing sites in and around the city and assesses them against a number of criteria. This site has not been recommended for allocation.

This document has two purposes:

- to present the site as an attractive and viable option for residential development, and:
- to review and analyse the Council site assessment procedure and demonstrate that there are aspects which haven’t been fully considered.

In order to ensure that the full potential of the site can be understood and promoted, Taylor Wimpey has engaged a multi-disciplinary project team to focus on “place” and “deliverability” from the very outset. The team consists of the following skills and consultancies:

- Masterplanners and Landscape Architecture: OPEN (Optimised Environments Ltd);
- Planning consultants: Iceni
- Transport consultants: Transport Planning Ltd
- Drainage consultants: Indev

This Development Framework document has been prepared by OPEN, drawing on the work prepared by the rest of the team as appropriate.



View west across site from cemetery

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# 2 Ratho

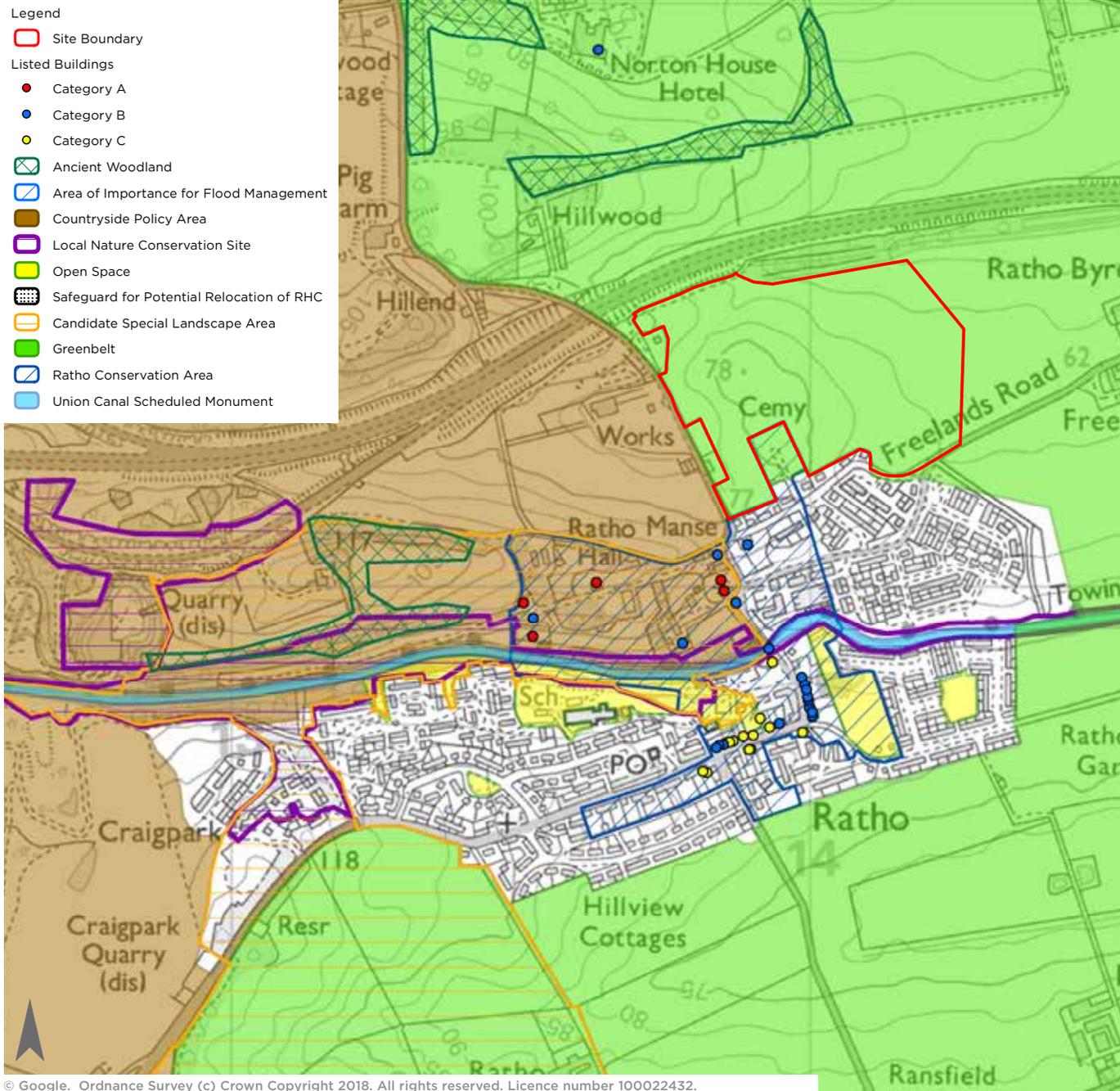
## 2.1 Settlement Form

Ratho is a village some 12km to the west of Edinburgh city centre. It has a population of under 2,000.

Ratho was historically an agricultural settlement until the construction of the Union Canal, built in the first half of the 19th century. It was designed by the engineer Hugh Baird, Baird Road in Ratho is named after him. This pre-dated the railway line and opened Ratho up to increased business opportunities allowing transportation of quarrying material. Ratho Quarry and Craigpark Quarry were in close vicinity. The Bridge Inn was an important stopping point.

In the 19th century the village developed along a linear layout and consisted of whinstone single storey terraced cottages, within long plots, and were built along the contour lines. Other larger buildings were interspersed along what is now the eastern part of Main Street. This is now a Conservation Area along with the more scattered area of buildings within the north-west of Ratho, broken up by areas of mature woodland.

Housing expansion into the 1970s kept to this linear form, spreading out to either side of the urban core. After that, the development pattern changes noticeably; this change in pattern starts with the typical cul-de-sac winding form of the latter part of the 20th century and has been continued into the Craigpark Quarry housing development. Northwards, the development around the new Marina reflects current masterplanning principles but could not be considered linear development typical of the historic Ratho form.



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fig. 02: Site Designations

Scale: 1:10,000



RATHO STATION

HILLWOOD QUARRY

SITE

BAIRD ROAD

M8

UNION CANAL

INTERNATIONAL CLIMBING ARENA

MARINA

INN

COMMUNITY CENTRE

COMMUNITY WOODLAND

FOOTBALL PITCH

PARK AREA

RATHO PRIMARY SCHOOL

LIBRARY

LOCAL SHOPS

WAVEGARDEN SCOTLAND (OPENS 2021)

PLAY AREA

MEDICAL PRACTICE

MAIN STREET

CRAIGPARK QUARRY



10 fig. 03: Site Orientation

## 2.2 Ratho: Place

Despite being a relatively small settlement, Ratho benefits from a number of local facilities. The local shops include a Post Office and Village Shop, and a pharmacy. Ratho benefits from a Primary School and good community facilities and services including a primary school, library and community centre, and a recently built medical centre. Larger, comprehensive shopping is available within easy reach at the Gyle and Hermiston Gait.

Ratho is also well-located for leisure and cultural pursuits: the Bridge Inn is a well-known restaurant and bar on the Union Canal, in itself an attraction, and the Edinburgh International Climbing Arena (EICA) is located within a former quarry close to Ratho. Jupiter Artland, a privately-owned contemporary art gallery, park and cafe is located within 20 minutes cycle of the village and Wavegarden (Scotland) – an inland surfing lagoon will open in 2021 on the western edge of Ratho in Craigpark Quarry.

A choice of employment opportunities are available locally at Ratho Station, Newbridge, Edinburgh Airport and the International Business Gateway and Gogarburn.

All of these aspects combine to ensure that Ratho is an attractive place in which to live. All the benefits of a vibrant smaller settlement, whilst being close to employment and many other life-enhancing facilities and yet within easy reach of Scotland's capital city.



Local shops including a pharmacy and Post Office



The Bridge Inn: local bar and restaurant with rooms



Primary School



Community building / Library



Recently built Ratho Medical Practice



View east across site from Baird Road

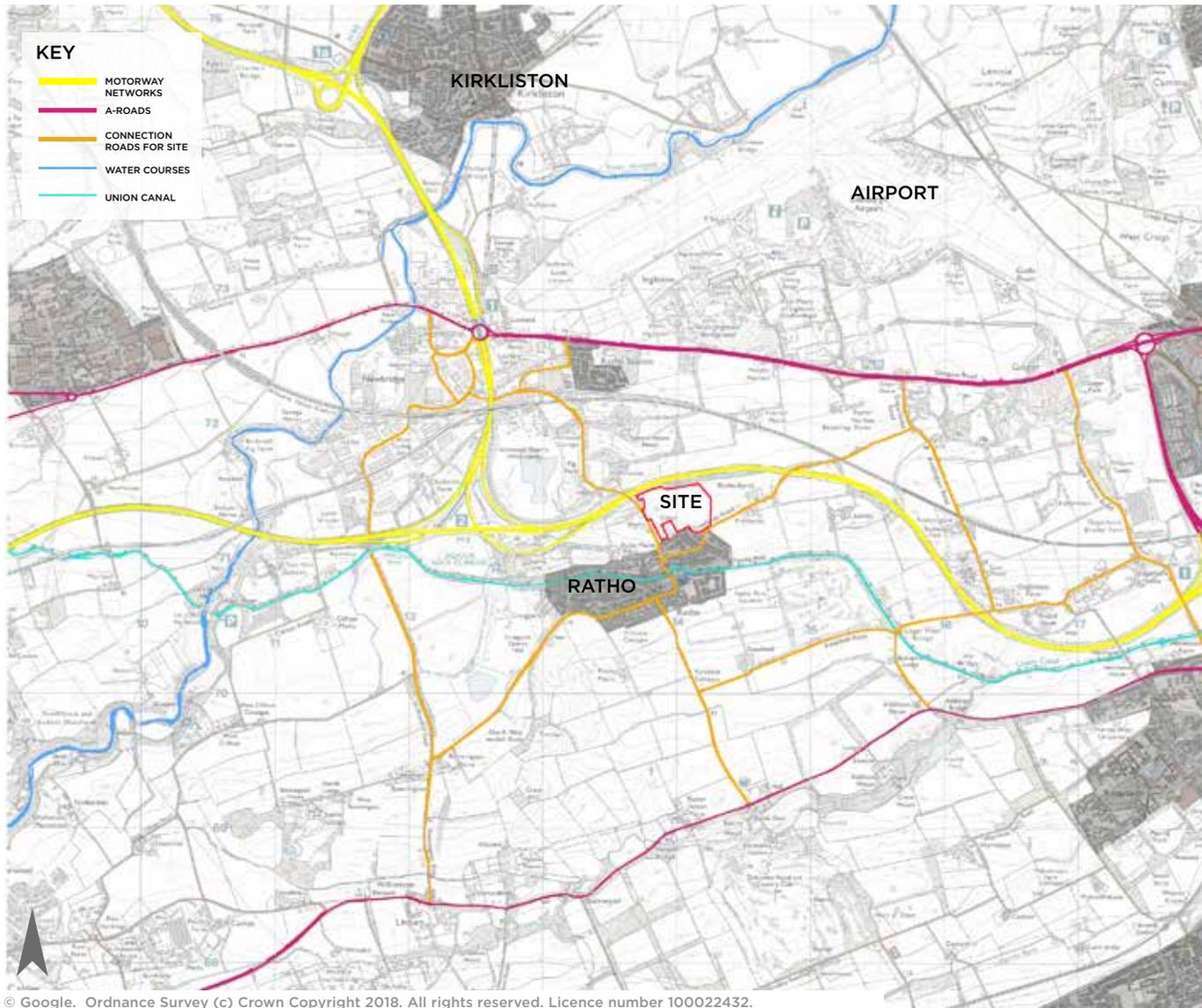
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# 3 The Site

## 3.1 Site Description

The proposed development site, which is referred to as North Ratho, Land at Norton Mains, is located on the north-eastern edge of the Ratho settlement. The site consists of an area extending to 16 Ha of land, the majority of which is farmland. This farmland extends to the east of the site but the boundaries to the rest of the site are as follows: to the north is a belt of mature woodland with the M8 motorway beyond, to the west is Baird Road which connects the site to Ratho to the south and Ratho Station to the north, and to the south are the rear gardens of existing houses and a cemetery on Freeland Road.

The site is currently farmed as part of the farm holding to the east; the proposed site boundary will divide this field allowing the eastern portion to remain as farmland. On the western edge of the site adjacent to Baird Road are a small number of properties including the Pilton Retreat charitable organisation which is accessed directly from the road. The site wraps around the cemetery from west to east, the boundaries of which are defined by a high stone wall.



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fig. 04: Site Location

Scale 1:50000 @ A4



0m 200m 400m 600m 800m 1000m



Viewpoint 01 - View along Western edge



Viewpoint 02 - View from Cemetery to Eastern corner



Viewpoint 03 - View along Northern edge

## 3.2 Landscape Context

Ratho sits to the west of Edinburgh within a tract of landscape characterised by a mix of arable farmland along with other small patterned land uses, but defined to the north by a corridor of major infrastructure on an east-west alignment consisting of the main line railway, the M8 motorway and the A8, and compounded by the intersection junction with the M9 to the north-west of the village.



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fig. 05: Viewpoint Location Plan

The Ratho hills, distinctive in the landscape, lie to the west and the south of the village. Some of these have been quarried in the past, and there is evidence of this in a ring around the west of the village; Craigpark (partly recently developed for housing, and partly due to become the Wavegarden Scotland), Ratho Quarry (now the EICC), and Hillwood Quarry to the north (still operational as a whinstone quarry).

Ratho lies to the south of the M8 and A8, next to the other major piece of linear infrastructure within this landscape, the Union Canal.

To the south, the area is more rural but still actively managed as arable farmland and leisure use with a distinctive pattern of hedgerows, fragmented areas of policy woodland – especially around Dalmahoy Hotel and Country Club – field trees and a mature riparian edge along the Gogar Burn.

Landscape policies guiding change and protection within this area are shown on the Landscape Designations and Local Development Plan Proposals Map shown at the start of Section 2. Protective boundaries are drawn tight around Ratho; land to the south, east and north-east is all Greenbelt. Land to the west and north-west has a Countryside Policy Area protection.

Ratho Conservation Area covers a distinct area which has been safeguarded since 1971. It comprises the Union Canal and the historic core of the village with a variety of building types as well as the area around the Category A Listed Ratho Hall. The

cemetery around which the proposed development site wraps was not part of the original Conservation Area status but the boundary has now been drawn to include it.

The essential character of the Conservation Area, which will help inform how development is laid out within this proposal is as follows:

- The Conservation Area fits well into its landscape setting.
- The built form still reflects the essence of the original settlement pattern.
- Its core is predominantly a linear form.
- The scale of the Conservation Area is essentially domestic and intimate.
- The historic buildings form strong visual stops, landmarks, focal points and gateways.
- There are powerful and clear divisions between town and country at the built-up edges.
- The Union Canal provides both a definitional and unifying role.

“New development will require to be of appropriate architectural quality and relate in mass, scale, outline and character to the existing village fabric. The construction materials should be stone for walls and chimneys and either Scotch slate or clay pantiles for the roof.” Whilst use of natural materials is no longer viable for new housing except in bespoke circumstances, there is an opportunity to reflect principles of scale, layout and setting in new development.

### 3.3 Topography and Landform

The landform ranges from 60m AOD up to 75m AOD with the highest point located towards the western edge of the site. From this point there is a gradual slope towards the eastern boundary where the lowest point sits. The slope from the high point down towards the western boundary on Baird road is more obvious.

Generally the average gradient across the site is between 1 in 15 and 1 in 20. Some areas which are steeper are closer to 1 in 10, particularly in the north and west of the site where it grades down from the high point towards Baird Road and the existing woodland belt to the north. The southern portion of the site sits at about the same level as the cemetery and existing housing on Freelands Road.

This is illustrated on the accompanying slope and height analysis diagrams, which show that there is scope for development on this site which can work with the contours and limit the need for any significant earth moving. Also evident from these diagrams is the relatively low height that the site sits in relation to the surrounding context to the south, west, and north.

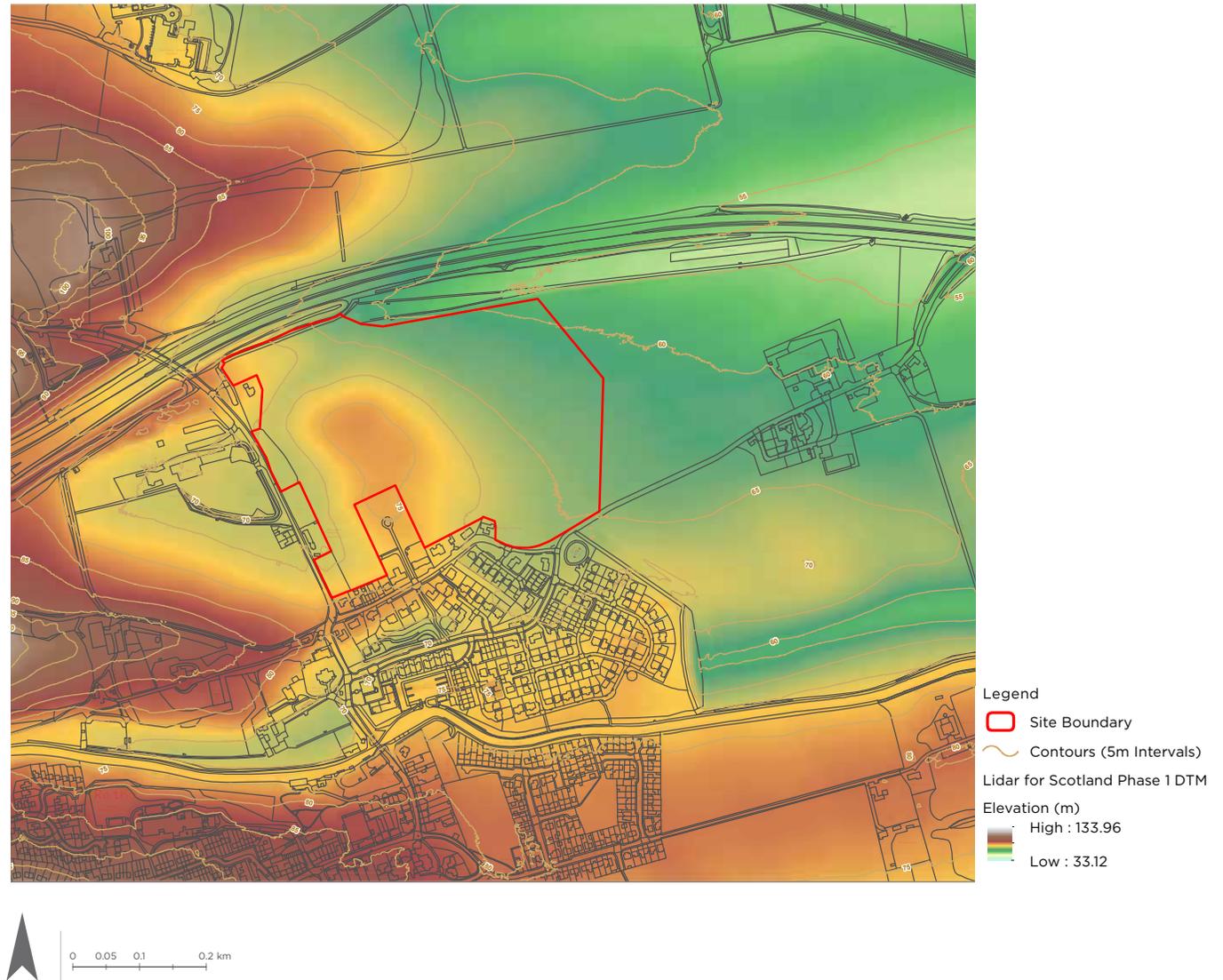


fig. 06: Height Band Analysis

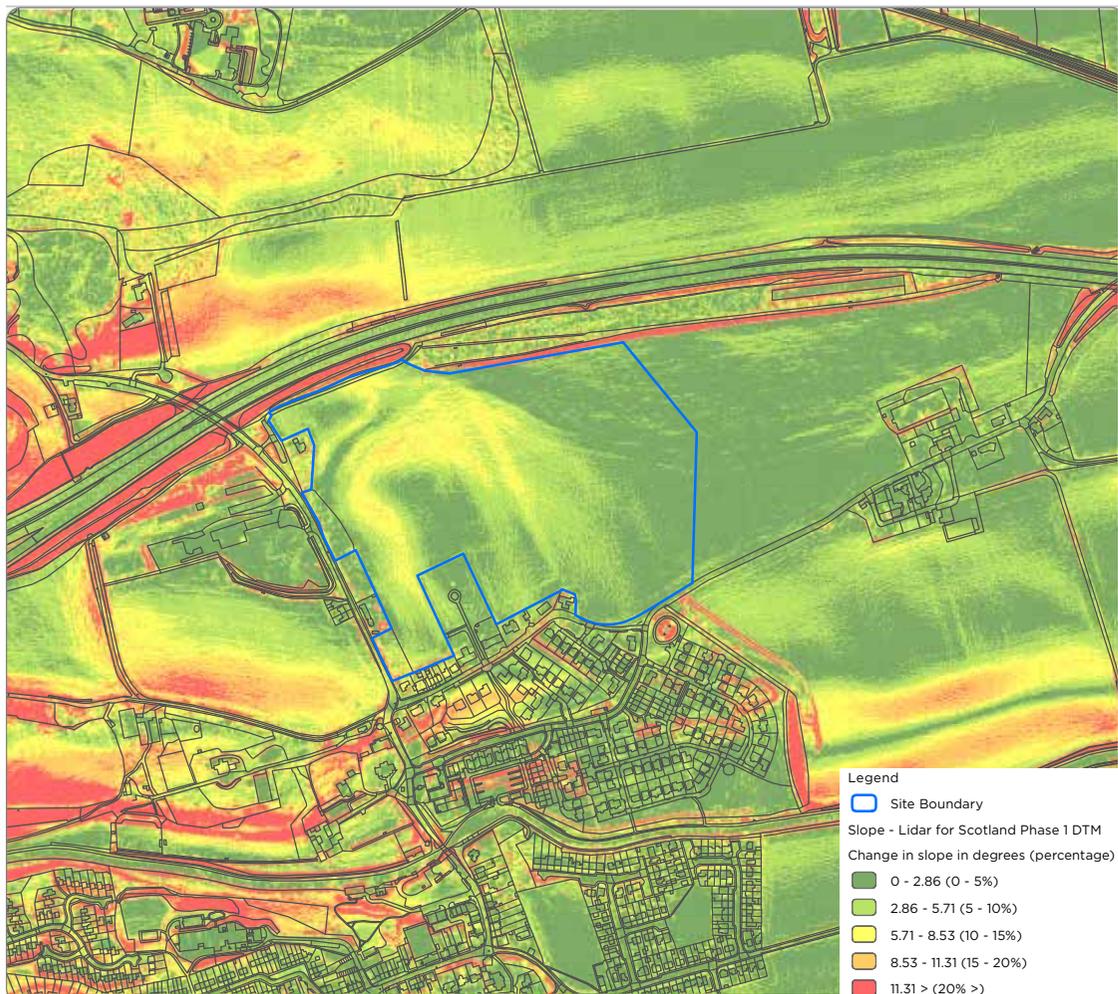


fig. 07: Slope Analysis



View looking down to Eastern corner from highest point



View looking along Western edge towards cemetery

## 3.4 Views

North Ratho, Land at Norton Mains has an overall elevation that generally sits below the surrounding landform with the exception to this being the land to the east of the site. This means that the site is only clearly visible from the east, most notably in long distance views from the Union Canal towpath and from the M8 motorway.

### Views Towards the Site

Viewpoint 01 on the adjacent page is a view from the Union Canal towpath looking west towards the site. The effect of development on this view has to be taken in context with development that has already been undertaken in the land to the south of the site which is also clearly visible from this viewpoint. The view of this existing development has been mitigated by the introduction of a belt of woodland along the eastern edge that helps to contain this development parcel and limit the effect on this view. This approach would be continued into our site, picking up the line of this strip of new woodland and continuing north across the site to tie in with the belt of mature woodland on the southern boundary of the M8 motorway. The landform behind the site rises up and would serve as a backdrop to any proposed development, with existing mature trees softening this view.

On approaching the site from the east along the M8 (viewpoint 03) there is currently a clear view of the site as the landform rises up from east to west. The mitigation approach outlined above, namely the introduction of a woodland belt along the eastern boundary of the site would help to screen any views of proposed development within the site. The more visible high

point would be kept clear of development and reserved for open space to further mitigate the effect on this view. Apart from this there are no views across the site from the M8 to the north, the existing band of mature trees prevents any direct views into the site, and this section of the motorway is in cut so sits below the proposed site.

Existing housing along Freeland Road and mature trees along Baird Road restrict views into the site from the south and west although a clear view into the site is evident from Baird Road north of the Pilton Retreat (viewpoint 5). There is already development along this road with a large detached house to the north and Ratho to the south, development addressing the road in this area feels like a natural progression. The housing along Freeland Road faces south and therefore backs onto the site. Any views into the site would be from first floor rear windows.

The existing cemetery occupies a high elevation sitting directly south of the high point within the site. Due to this the views of the site from here (viewpoint 04) are restricted, the existing stone wall around the cemetery serves to further mitigate the impact on this view. Any proposed development would provide an appropriate landscape buffer to further mitigate the impact on this view.

Because of the surrounding landform, there are no views of the site from the centre of Ratho.

### Views from the Site

Due to the high point within the site and the surrounding landform that slopes away to the east, there are views from the site towards Edinburgh. Arthur's Seat and Edinburgh Castle are both visible from the highest point within the site. Any proposed development would aim to retain this high point as open space to take advantage of these views out from the site but mitigate the impact of development on views into the site.



fig. 08: Viewpoint Location Plan



Viewpoint 01 - View of proposed site from Union Canal



Viewpoint 02 - View from Freeland's Road bridge east of proposed Site



Viewpoint 03 - View from Eastern corner of field adjacent to site



Viewpoint 04 - View from Cemetery



Viewpoint 05 - View from Baird Road looking east into proposed site

### 3.5 Site Features

The site has few features, a legacy of its former use for agriculture. The few that exist are mainly around the edges of the site area and are illustrated on the accompanying photographs.

There are no trees or hedgerows within the main area of the site, although they form important features on some of the edges. There is a mixed native hedgerow along Freeland Road containing one tree of note. An attractive grouping of mature trees line the land controlled by Taylor Wimpey to the south of Baird Road. Trees which edge the site to the north, next to the M8, are important features providing amenity for screening and contain two small burns which connect and are culverted under the M8.

The sandstone rubble wall around the cemetery is approximately 1.8 m high and is an attractive feature. The cemetery has Conservation Area status but the wall is not a Listed feature.

The Pilton Retreat is on the edge of the proposed development site along Baird Drive and is also surrounded by mature trees which connect with the trees on the proposed site to form an attractive green network which crosses the road and link with a mature stand on the other side.



Photograph taken: 02/03/20

Wall at north end of cemetery



Photograph taken: 02/03/20

Pedestrian pathway through Cala residential properties



Photograph taken: 02/03/20

Hedge along Freeland Road



Photograph taken: 02/03/20

Pilton Retreat



Photograph taken: 02/03/20

Mature band trees and two flowing burns



Photograph taken: 02/03/20

Wetland to the north of the site beside the M8



- Hedge along freelands road
- Flowing burn at base of site
- Drainage water feature
- Stone wall around cemetery
- Site boundary
- Existing houses adjacent to site

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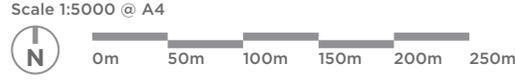


fig. 09: Site Features

### 3.6 Ground Conditions

A site investigation has not currently been carried out but a desktop study and review of available data has indicated site conditions as follows. An assessment has revealed that historically the site has been undeveloped with much of the adjacent land the same apart from the M8 motorway and some individual properties.

Soil conditions are known to comprise of glacial till with an area in the west of the site potentially underlain by sand and gravel deposits.

The site is not within a coal mining reporting area or development high risk area and no mine entries were recorded within the vicinity of the site therefore mining instability is not considered to pose a constraint to proposed development.

A detailed site investigation would be required prior to any development.

### 3.7 Drainage and Utilities

The contours of the site indicate an existing surface water drainage catchment within this area that consists of two unnamed burns just beyond the northern boundary of the site adjacent to the M8 motorway. These two features combine to form an single burn that drains through a culvert underneath the M8. In addition to this, the Union Canal is located several hundred metres to the south of the site.

A surface water drainage culvert crosses the north west corner of the site and discharges into the southernmost of the two burns. A Scottish Water combined sewer crosses the north west corner of the site conveying flows from the development to the south of the site.

There are no additional utilities within the site boundary.

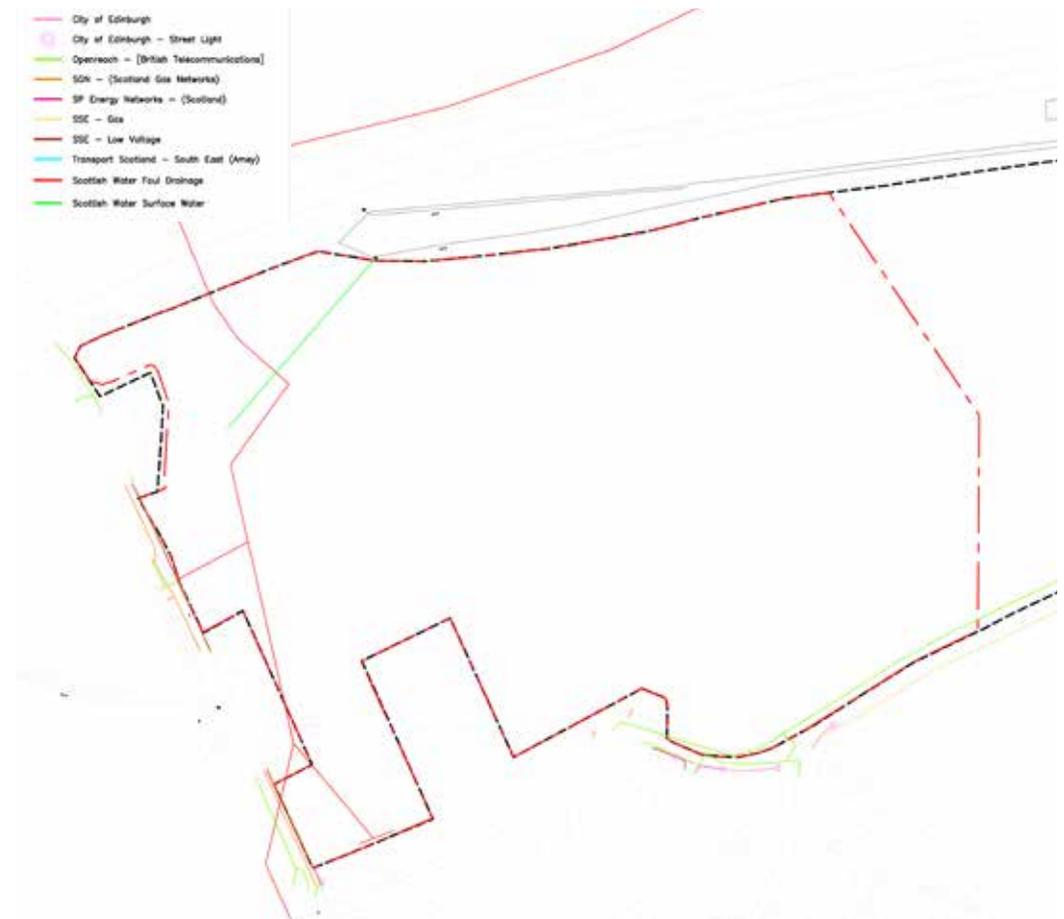


fig. 10: Drainage and Utilities

Scale 1:5000 @ A4



# North Ratho, Land at Norton Mains

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Development Framework

March 2020

**Part Two**





fig. 11: Transport and Accessibility

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## 3.8 Transport and Accessibility

Transport Planning Ltd has carried out a Transport and Access Appraisal. This sets out the existing provision within Ratho which is summarised in the following sections.

### 3.8.1 Sustainable Transport Options

#### Pedestrians

Baird Road forms the western edge of the site and Freeland Road the southern edge.

There is a footway on the eastern side of Baird Road as it passes the proposed allocation site. This footway continues northwards into Ratho Station and southwards into Ratho. The footway to the south would provide a link to facilities within Ratho, such as Ratho Primary School (around a 10-minute walk (750m) from the southwestern corner of the proposed allocation site), the Post Office (around a nine-minute walk (700m) from the southwestern corner of the proposed allocation site) and Ratho Medical Centre (around a 12-minute walk (around 1.1km) from the southwestern corner of the proposed allocation site). The footway to the south also provides a link to Core Path CEC15 which runs alongside the Union Canal. A local path runs from the western side of Baird Road, opposite its junction with Freeland Road, and runs westwards. This provides an attractive route directly to the EICC. A branch routes back to Baird Road immediately to the south of where it crosses the M8

motorway, while the remainder continues westwards to meet the path alongside the Union Canal around 1.8km to the west.

There is a footway on the southern side of Freeland Road for the first 30m or so east of its junction with Baird Road. A remote footpath then restarts on the southern side around 50m further east for around 100m eastwards alongside some recently constructed new development in association with Ratho Marina. There is no further section of footway on Freeland Road although there are numerous connections through the new development area south of the proposed site and along Freeland Way which then lead onto the Union Canal footpath and into the local centre.

Planning Advice Note (PAN) 75 Planning for Transport' states that 'A maximum threshold of 1,600m for walking is broadly in line with observed travel behaviour' for accessibility to local facilities by walking and cycling. All of the above facilities are closer than 1,600m. The site is also within the two-mile acceptable distance standard for walking to Primary School.

#### Cyclists

Core path CEC15 path runs along the Union Canal and also forms part of National Cycle Network (NCN) 754 which extends between Clydebank and Edinburgh. This path provides a route to Edinburgh Park. It is around an 18-minute cycle (around 6.3km) from the proposed allocation site to Edinburgh Park railway station, for example, where it is possible to transfer to tram or train (with bikes) to travel into the city centre.

#### Public Transport

The nearest bus stops to the proposed allocation site are on Baird Road around 230m to the north of the proposed allocation site and around 260m to the south of the junction with Freeland Road. At the time of writing, these stops are served by Lothian Buses' 20 service which links Ratho with Gyle Centre, Edinburgh Park station (for interchange with train and tram services), Westside Plaza, Kingsknowe, Slateford and Chesser. It operates every 30 minutes Monday to Saturday daytime. In the evenings and all day on Sundays it operates hourly between Ratho and Edinburgh Park.

#### Summary of sustainable travel options

The proposed allocation site is located adjacent to existing footways and can easily access the Core Path and NCN networks. Access to bus services is also available.



Existing bus provision on Baird Road adjacent to site

## 3.8.2 Vehicle Connectivity

### Roads Network

Baird Road is a single carriageway road with one lane in each direction. It links Ratho with Cliftonhall Road at Newbridge and provides a link to the A8 at Ratho Station where there are numerous employment options.

It is governed by a 60mph speed limit along the northern part of the frontage of the proposed allocation site, which reduces to 30mph as it enters the built-up area of Ratho and then reduces further to 20mph at the junction with Freelands Road.

Freelands Road is a single-carriageway road with one lane in each direction. Access for vehicles is prohibited at its junction with Baird Road. It is subject to a 20mph speed limit and forms a priority junction with Freelands Way around 350m east of Baird Road. East of that point, it provides a route towards Gogarburn, where there are also good employment opportunities.

Freelands Way is also a single carriageway road with one lane in each direction. It is also subject to a 20mph speed limit and forms a route between Freelands Road and Baird Road and provides access to a residential development.

There is site frontage along both Baird Road and Freelands Road giving opportunity for connected and permeable development.

## 3.9 Appraisal

This is a high level strategy so the site constraints have not been fully established. At this stage of analysis the site appears physically relatively unconstrained, with no history of contamination or industry, and offers a good site for residential development.

It is close to a number of employment, retail, cultural and leisure facilities that would minimise the need for significant travel and the existing site features can be accommodated into the development. A reasonable bus network exists and there are good footpaths whilst the Union Canal offers a good opportunity for cycling both for leisure and for commuting.

A number of properties edge the site; none of these are directly orientated toward the site but their amenity should be protected in any development strategy going forward.

In terms of landscape fit the site is not visible from the centre of the village but will form the new eastern edge of the settlement. The site is generally most visible in views from the east which also includes glimpses toward it from the motorway. This will change perception of Ratho' setting within the landscape but there are opportunities to mitigate against this by creating a robust planting strip along the eastern edge. If sensitively done this could also improve the eastern edge to the village which is currently quite abrupt due to the development of the recent housing to the south of Freelands Road.

The most prominent part of the site is the central area of higher ground, to the north of the cemetery. It is this part which is visible in views toward the site from the east in particular. This should be kept clear of development and could become an open space feature allowing views to

the distant Edinburgh skyline. Whilst not a flat site, the site topography does not preclude development and maximising the topography can help with creating site character.

There is a good opportunity to create a permeable street structure with the ability to connect with the existing street structure at both Baird Road and Freelands Road. Whilst there is a footway on Baird Road a footway can be provided within the site that is wide enough for shared use and will connect into the south-west corner bringing a well connected point of access to walk to local facilities within the village.

The area to the south-west of the site which is surrounded with trees and which the Pilton Retreat backs onto lends is also next to the cemetery which is part of the Conservation Area. This small area of land lends itself to community uses, and this could be further explored through later stages of the development strategy.

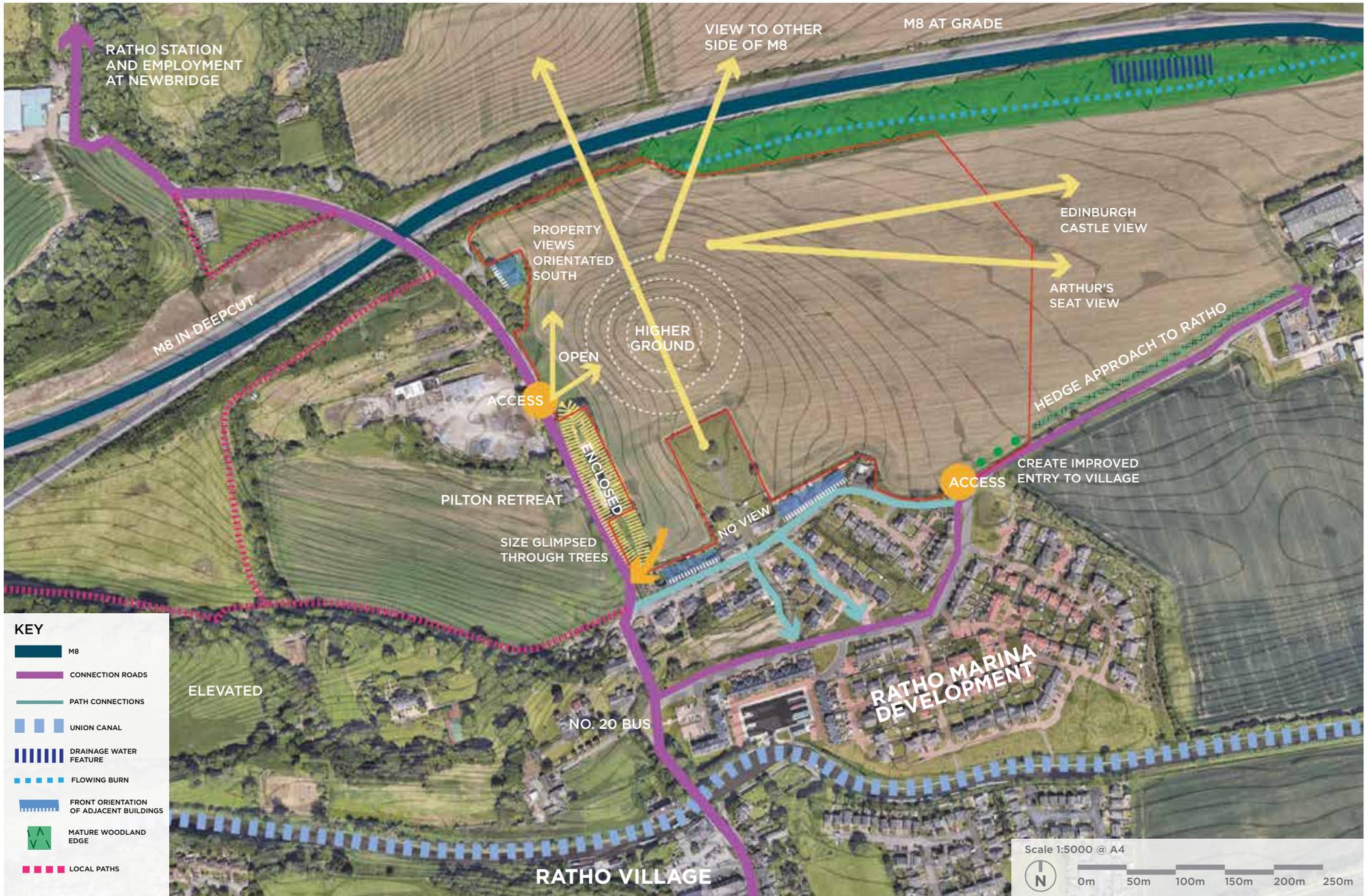


fig. 12: Site Analysis

North RATHO, Land at Norton Mains



fig. 13: Character sketch: approach from east to west on Freelands Road (Ratho Gateway)

# 4 The Opportunity

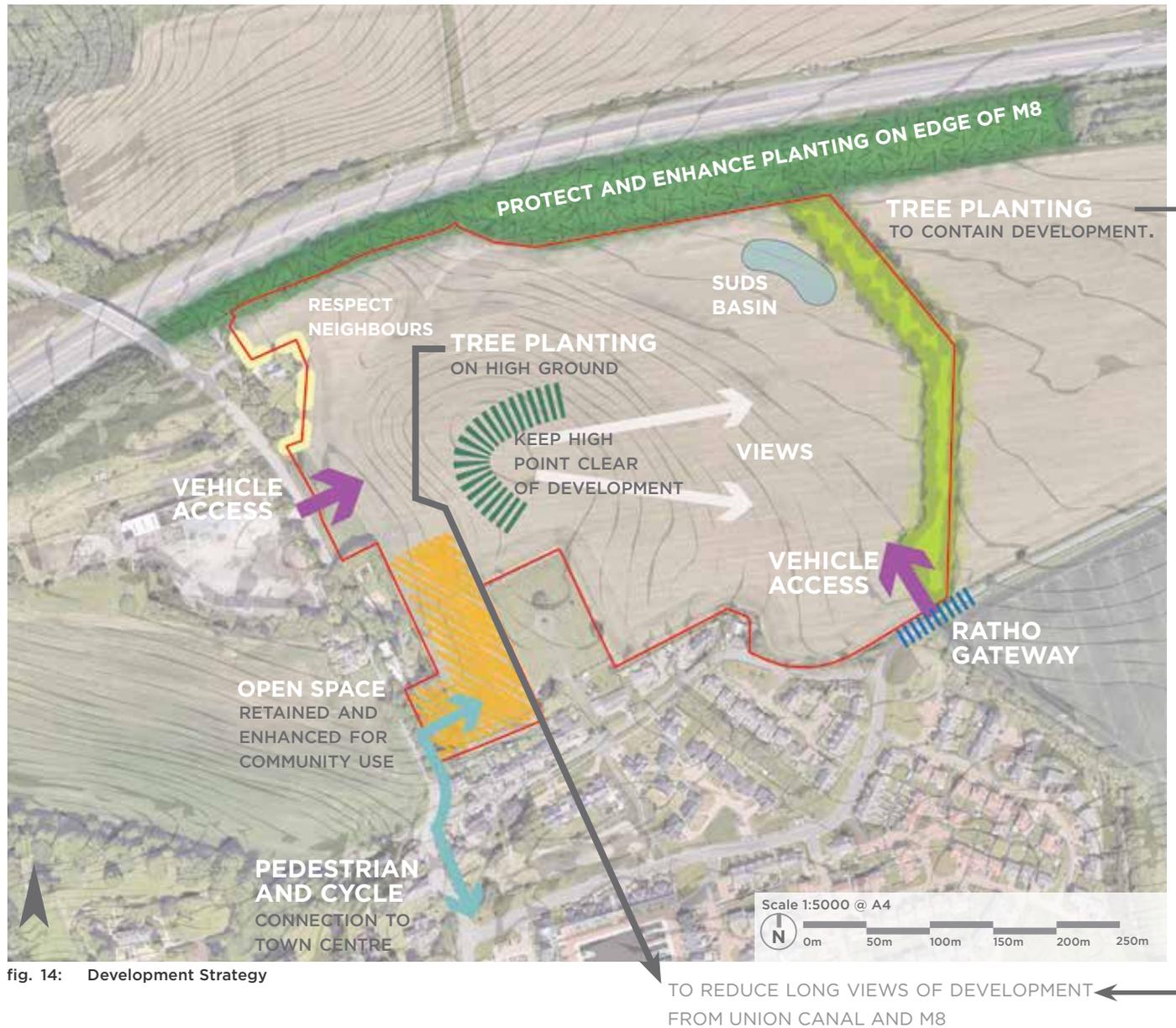


fig. 14: Development Strategy

## 4.1 Strategy for Development

The strategy for development is shown on the Development Framework diagram and encompasses the following elements:

### Access and connectivity

- Vehicle access off Baird Road and Freelands Road;
- Pedestrian access alongside these but an off-road route within the SW corner of the site.

### Working with the Landscape

- Plant trees on the higher ground in a curve which will visually link with existing pockets of trees on other areas of higher ground and filter views of development from the M8;
- Keep higher ground clear of development;
- Create a robust planting strip on the eastern boundary which allows a green network linking the mature screen planting along the M8 with the recent planting around the new development on the eastern edge.

### Respecting neighbouring properties

- Provide appropriate setbacks and planting to protect amenity.

### Providing facilities

- SuDS is located to the north-east of the site and should be planted as part of a blue-green network around the north and east of the site;
- A generous area of community space gives an opportunity for play, access, amenity and growing spaces.

# 5 Planning assessment

## 5.1 City Plan 2030

“Choices” is the Main Issues Report for the new City Plan 2030 and is supported by a number of number of studies including a Housing Study and a Landscape and Visual Assessment (LVA).

### Landscape and Visual Assessment

The Landscape and Visual Assessment prepared on behalf of the Council seeks to set out the following:

*“considers opportunities and constraints for housing development on greenfield areas across Edinburgh. The study focuses on landscape and visual issues and will form part of the suite of environmental, social and sustainability information evaluated by the Council in the emerging City Plan 2030.”*

It is authored by Carol Anderson and Nigel Buchan and was produced in April 2019. The proposed development site was assessed as part of this study.

Norton Mains, North Ratho, is a part of Landscape Character Area 22 Ratho Farmland. This is then divided up into Council Assessment (CA) areas. The whole of this area south of the M8 was assessed as one within the document, CA5, Norton Mains when in fact it is a much smaller area being promoted by Taylor Wimpey. The authors do not consider that there is scope for development within this area on grounds of:

- *the landscape forms part of the hills and ridges enclosing the northern edge of Ratho;*
- *development conflicts with the distinct linear form of Ratho;*
- *Visually prominent in long views from the M8, more open sections of the Union Canal, and from parts of Ratho particularly if located on the higher western part of the site.*

The LVA findings have been considered within the context of a more detailed site study, and in the promotion of a smaller site

area. The response is as follows:

- (i) *“The landscape forms part of the hills and ridges enclosing the northern edge of Ratho”*

Reference should be made to Figure 16, Context Analysis, which looks at the landform around Ratho in more detail. Most of the area is characterised by these hills and ridges however this includes Ratho Village itself which doesn't nestle within the landscape, but is built on a ridgeline; clearly visible on the



View from M8 looking west across site

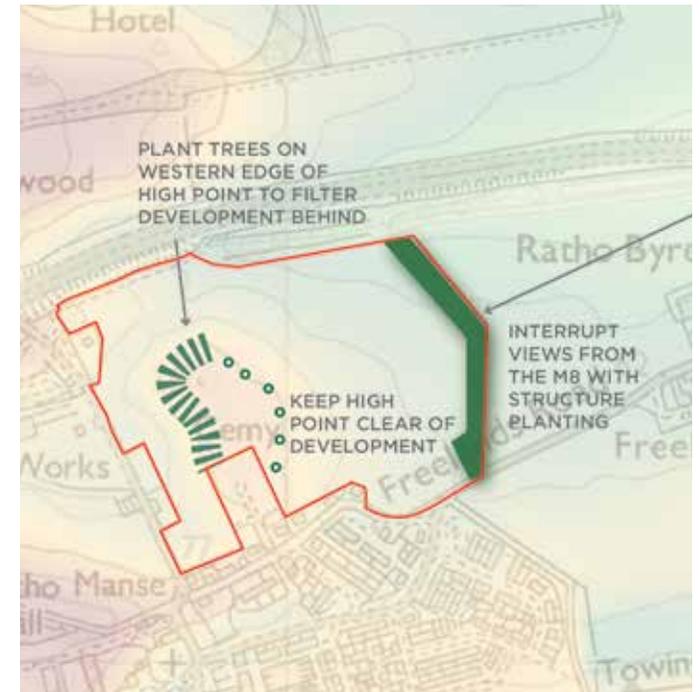


fig. 15: Landform Development Strategy

diagram. The high point, of the site at a height of 78m AOD is in fact lower than much of Ratho itself which averages 80m AOD within the traditional core. Keeping the high point of the site clear of development would therefore seem an appropriate response that would allow development within this area.

(ii) “development conflicts with the distinct linear form of Ratho;”

The linear form of Ratho is evident, but the principle of this has already been altered over the past 30 years or so by successive developments. This includes the most recent developments to the north east and west of the village. Not only through their layouts, which are not linear, but the relatively extensive Marina development consolidates the urban form into something less linear and more compact.

(iii) *Visually prominent in long views from the M8, more open sections of the Union Canal, and from parts of Ratho particularly if located on the higher western part of the site.*

Regarding visual prominence, this reduced area of development will not be as prominent from the M8 as anticipated within the LVA given that reduction in size. The western part of the site is higher (see Figure 16) but excepting the higher point the land elevation is contiguous with the adjacent Marina development, and in fact lower in part. There will be some visibility of the site from the M8 where Freeland's Road passes over it and the screen planting is reduced and also from the eastern extent of the Union Canal, beyond Ratho. By adopting good practice and mitigating through judicious planting and development form, the significance of this can be reduced.

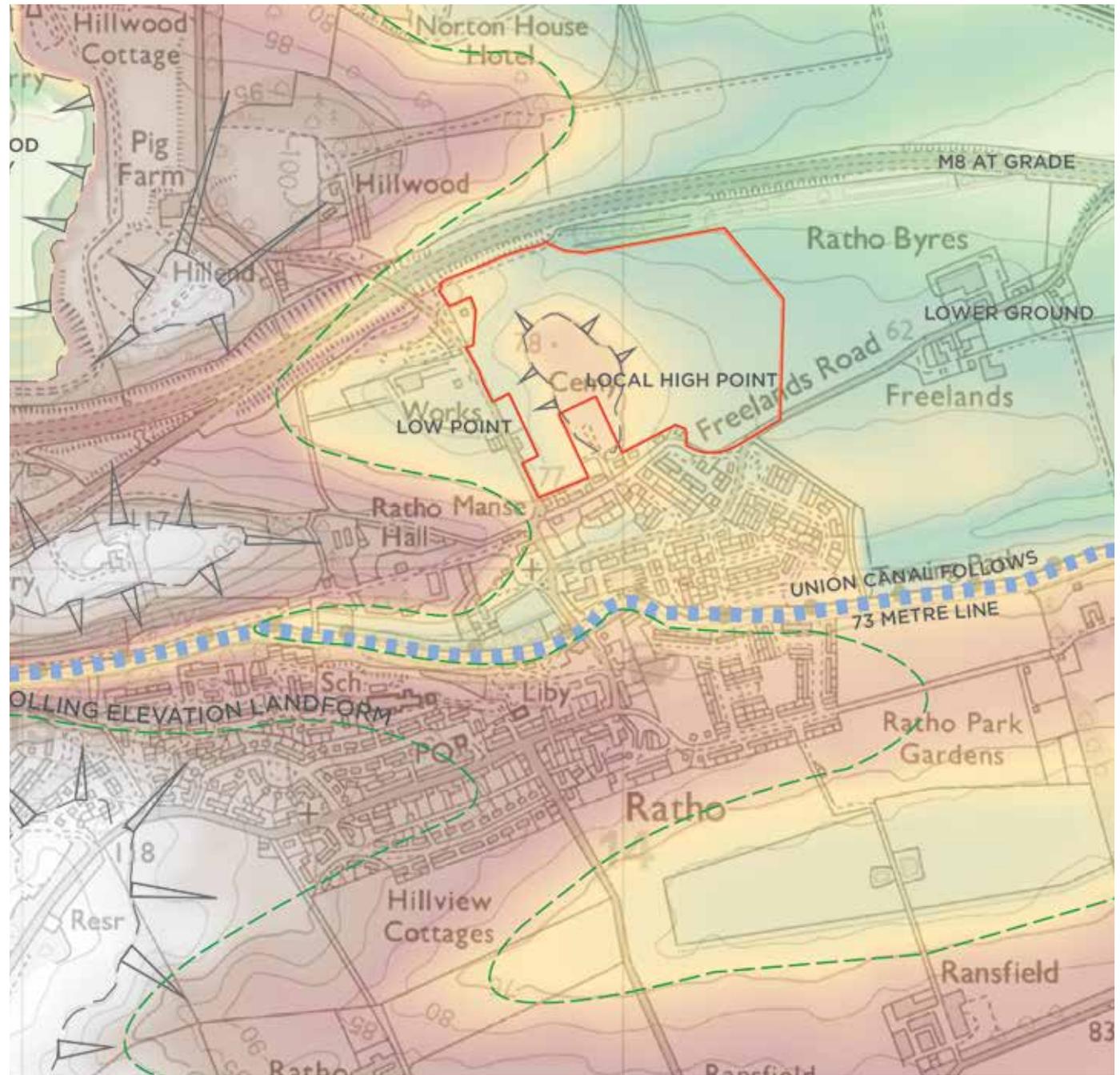


fig. 16: Context Analysis

Scale: 1:10,000

## North Ratho, Land at Norton Mains

## Housing Study

The Council include some of the above points within their Greenfield Site Assessment of Norton Mains within Part 2b of their “Housing Study”. The Council is overall negative in their assessment of the site (albeit a much larger area and not the smaller site being promoted within this submission) and includes the comments from the Landscape and Visual Assessment. Other points of note relevant to masterplanning, the focus of this response document, in response to some of the comments are as follows.

### *(i) Active Travel*

Comments on the lack of pedestrian connectivity along Freelands Road toward the International Business Gateway (IBG) can be in part addressed through Taylor Wimpey delivering an appropriate path along the land which they control at Freelands Road allowing the Council to then connect to this to deliver additional sections.

The walking distance between IBG is an hour and cycling takes around 17 minutes. Not many people will walk two hours a day to go to work and return home but there are also other options for those that will:

- Pedestrian connectivity is achieved travelling north up Baird Road and then along a quieter access road path network through Norton House grounds and onto Quiet Route 9 as shown on the West Edinburgh Routes Plan. This is a pleasant walk and takes only just over an hour.
- Pedestrian and cycle connectivity is achieved via Baird Road/ Station Road and Glasgow Road (Quiet Route 9). This has only one small section with no footway albeit the

footway could be wider in places. This is a walking route of around 1 hour 20 minutes and cycling takes 20 minutes.

### *(ii) Green Networks*

Edinburgh’s Open Space Strategy “Open Space 2021” identifies the restoration of Craigpark Quarry as an opportunity for a Country Park. Gains in the Green Network through new development is seen within the strategy as a positive; new development at Norton Mains could reflect this by offering a further increase in open space and community provision. Existing local paths offer good connections between Craigpark Quarry, the EICA and the proposed development site. A connected blue-green infrastructure is proposed within the site that links with its context.

### **Summary**

The view of the Council is that the site should not be allocated due to its poor accessibility, community infrastructure and visually prominent landscape. Community infrastructure isn’t a matter for this report and has been dealt with by the planning consultant.

Other issues can be addressed as follows:

- the accessibility opportunities are good, particularly considering the close accessibility of so many options for employment, leisure and retail. Taylor Wimpey would seek to work with the Council to improve active travel linkages.
- The visually prominent landscape is considered to have been over-emphasised within the wider context, especially given the reduced size of the site and that the development impacts can be mitigated against.

## Choices For City Plan 2030

The proposed development site seeks to meet the City Plan Vision through the following:

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

North Ratho can be a part of this through providing a high quality development which is well located for access to green space and a number of sporting and leisure opportunities; most of these are close enough to travel by foot or cycle.

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

Taylor Wimpey is committed to building affordable homes within the site, homes in a variety of typology.

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

The proposed development will seek to maximise connectivity through active travel and sustainable means of transport.

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

Through creating a well masterplanned development and ensuring that access to the village centre is an easy choice rather than getting into a car, then this development will support the continued sustainability of the local facilities.



fig. 17: Indicative Development Framework

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# 6 Development Framework

## 6.1 The Masterplan

The illustration on the previous page outlines one option of an indicative development framework for the site. This shows a net development area of around 8.5 Ha in total with a residential capacity estimated at this stage as 350 to 400 new homes.

The street network has been designed in accordance with principles set out in the Edinburgh Design Guidance, October 2018. The two points of access are from Freelands Road and from Baird Road. The street network works with the existing topography, the primary route follows the landform around the high point within the site to link the two vehicular access points. Secondary streets branch off this primary route to serve development parcels that also work with the existing landform.

Pedestrians and cyclists will use the street network but other path connections are also provided through the areas of open space within the site. Pedestrian access points into the site are provided from Baird Road and from Freelands Road, with the access point on Baird's Road providing a direct pedestrian link

to bus stops, and local shops in Ratho.

The existing woodland belt on the eastern edge of development to the south has been extended along the eastern edge of the site helping to mitigate views from the east.

A significant amount of open space has been provided, primarily in the south western portion of the site. This area has been reserved for community use and to reduce the impact of the proposed development on the existing housing and cemetery on Freelands Road. The high point in the site has been retained as open space to provide views out from the site but also to mitigate the views of development from the east. A landscape buffer wraps round the east and northern boundary with a pedestrian link around the edge of the site. The development parcel on the eastern edge of the site will overlook this area of landscape providing passive surveillance. Included in this buffer is a SUDs basin at the low point in the north east of the site which would also be overlooked by adjacent properties.

## 6.2 Development Layout

The adjacent key frontages diagram highlights some of the design principles that would be considered and developed as the development framework is progressed into a detailed application.

As the development layout progresses the careful consideration of building placement will allow street vistas to be terminated appropriately and effectively. The use of double frontage or corner turner units on key corners within the layout where possible will allow buildings to address streets and open space appropriately with active frontages.

Boundary treatments should be considered to define public and private space, providing continuity to street scenes. There will be opportunities to adopt some of the principles within the Ratho Conservation Area Appraisal in the next stages of design development.



fig. 18: Key Frontages

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North Ratho, Land at Norton Mains

## 6.3 Connections and Movement

### Pedestrians and Cyclists

Pedestrians will be able to access the site using the existing footway along Baird Road from Ratho. A proposed new footpath link at the south western corner of the site will connect into this existing local footway. A separate link connects the eastern part of the site to Freelands Road, from here there are further links to the centre of Ratho and the Union Canal. The A71 cycle super highway may provide an alternative route to connect to the cycle route alongside the canal. This section of the Union Canal provides cycle links to the wider area and, as advised by Sustrans, there are no issues with the capacity of the towpath at this point.

Internal pedestrian and cycle connections will make use of the proposed street network and remote cycle / pedestrian links. Routes through the site will connect with surrounding routes and provide opportunities for informal recreation.

### Public Transport

The site is located adjacent to an established bus network that travels along Baird Road. Pedestrian connections within the proposed development will provide access to this road where bus stops could be provided along this frontage. The bus route (Service 20) provides connections to the tram network at Edinburgh Park and the safeguarded extension to the tram. This could be re-routed through the site with the benefit of a larger catchment of passengers.

There is a train line to the north of the site that runs through Ratho Station, however there hasn't been a stop at Ratho Station since 1951. Access to the rail network is currently available by bus connection to Edinburgh Park Station.

### Road Access

The site can be readily connected to the main Ratho road network that connects to the surrounding area. Access to this existing network can be established through the introduction of two new junctions Baird Road, and with Freelands Road. These junctions would most likely be simple T junctions.



fig. 19: Connections and movement

## 6.4 Green Space Strategy

The open space within the site is distributed between two main areas, one is in the south west corner that includes the high point and the other wraps around the east and northern boundary.

The local park in the south west of the site encompasses opportunities for areas of play, seating, a community orchard, and footpaths connecting the site to the local amenities. Included in this area of open space is the high point which provides opportunities for walking through pictorial meadows and locations for seating that take advantage of the views out towards Edinburgh in the east. Tree planting on the eastern edge of this open space prevents views of development from the Union Canal or M8 motorway.

The landscape strip that wraps around the east and north of the site includes the SUDs basin to form a blue-green network along with existing trees to the north and to the south of Freeland Road. This provides a path network that connects the site into the surrounding area. New tree planting on the eastern boundary continues the alignment of the tree belt to the south and screens the development to views from the east.

The existing mature woodland belt adjacent to the M8 will be supplemented within the site boundary.



Community Orchard



Boulevard tree planting



SUDs basin with biodiverse planting



fig. 20: Landscape Development Framework

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## 6.5 Drainage and Utilities

The surface water drainage strategy for the site will be designed in accordance with Edinburgh City Council, SEPA, and Scottish Water guidelines. For residential development on this site it is deemed appropriate that there will be two levels of surface water treatment. The diagram on the adjacent page illustrates the proposed drainage strategy.

It is proposed that surface water from the development will discharge to the unnamed watercourse via a detention basin located along the northern boundary. Calculations have been undertaken for the basin utilising FEH rainfall data, and Windes, based on a greenfield release, and the resultant discharge rate and 1:200-year attenuation volume. Further information can be found in the engineering report.

The first element of the treatment will be within the detention basin which will be designed in accordance with current Scottish Water Sewers for Scotland requirements. The second level will be within an end of line swale immediately downstream of the basin.

This represents one possible approach to surface water treatment. Further discussion with Scottish Water/SEPA and City of Edinburgh Council is required subject to detailed design, and other forms of treatment may be required such as but not limited to, swales, porous paving, filter trenches, and bio-retention facilities.

It is proposed that foul drainage from the development

will discharge to an existing combined sewer within the site boundary at the north west corner.

Due to the existing landform within the site a pump station will be required adjacent to the SUDs basin with a rising main extending to the west.

The existing sewers will be incorporated within the layout allowing for the appropriate servitudes or diverted if required.

Scottish Water has advised that there is currently foul drainage capacity in the Newbridge PFI Wastewater Treatment Plant however a Drainage Impact Assessment will be required to confirm capacity in the existing network to accommodate the demands from the development.

All necessary utilities are available in close proximity to the site, however further investigation will be required into the capacity of these utilities.

The local electrical network includes an overhead HV cable on the eastern site boundary. Below ground LV cables are located within Baird Road and Freelands Road. Existing gas supplies are available in the vicinity. A 125mm diameter gas main exists within Baird Road with small diameter connections to adjacent properties. The capacity of this network has not yet been confirmed but it is generally the case that the network can be extended / reinforced to provide capacity. Telecom supplies can be made available through Openreach. There are localised overhead lines to the south east of the site and below ground apparatus located within the surrounding carriageways.

In summary the site is deemed to be an effective area for residential development on the basis of existing servicing provisions. Further investigation will be required into the capacities of these.

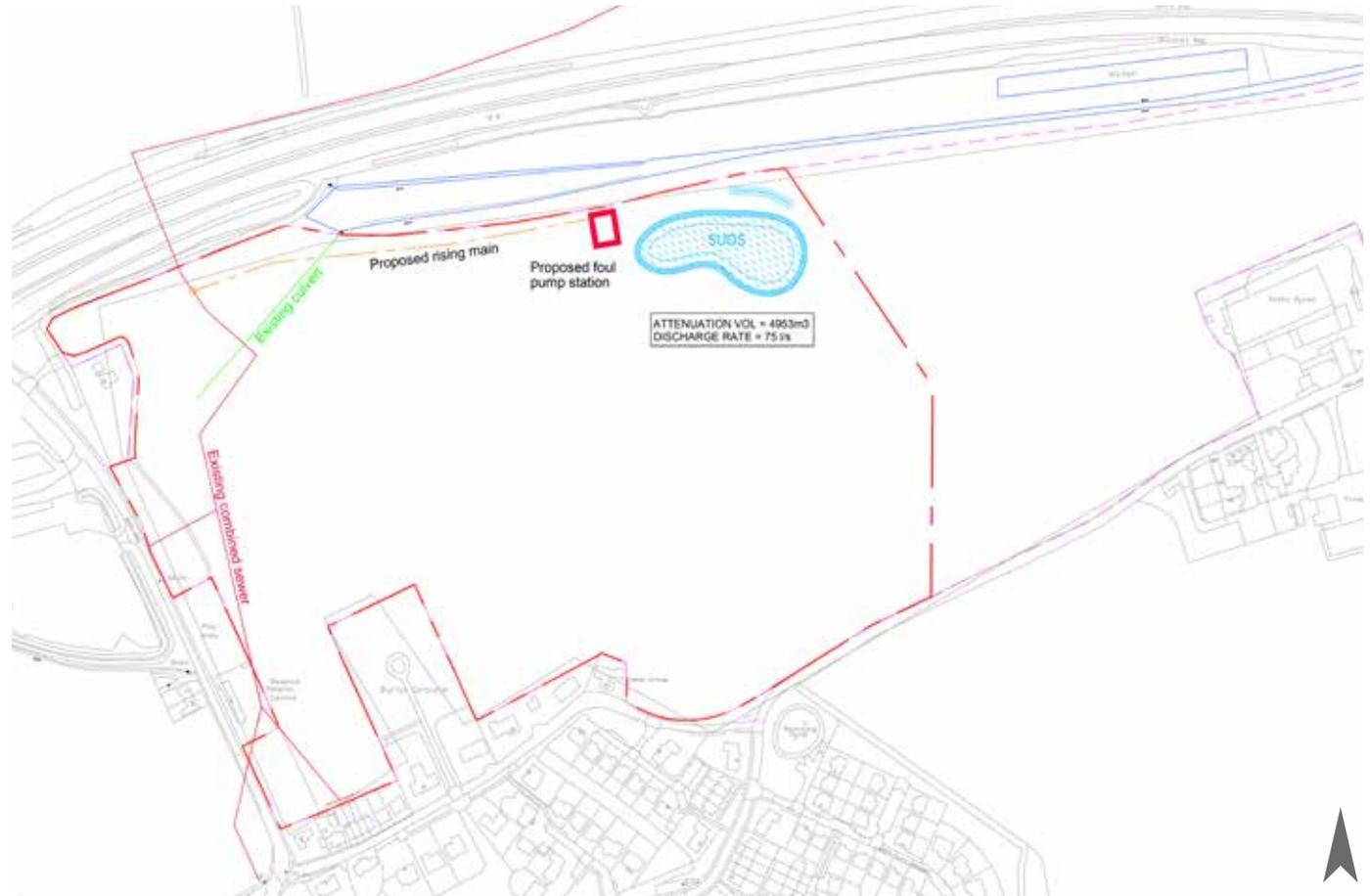


fig. 21: Proposed Drainage

Scale: 1:5,000

## 6.6 Added Value to Ratho

There are several opportunities for added value in allocating the land at Norton Mains, North Ratho and it is important that the release of greenfield land brings benefits to the village. Taylor Wimpey don't just build new homes: in 2017 they contributed £413m to local communities through planning obligations (i.e. £28,500 per plot built) by providing affordable housing, education contributions, public transport support, open space and community facilities.

The strategy for additional value should be developed as the site continues to be promoted for new development, but the following should be considered:

- affordable housing and a range of housing types will enable relocation, access to the property ladder and provision of a new homes;

- Supporting Ratho and the existing facilities will be achieved by creating attractive and easy walking and cycling links, making the use of these an easy choice;
- It is proposed to create a large area of community open space to the south-west of the site. This creates multiple benefits such as additional space for the Pilton Retreat, a charitable business on the western edge of the site which uses play as the focus for residential breaks; play for the wider community, and space for growing such as an orchard and also allotments should there prove demand. This will also allow a new path to be created in the best location for access to the village centre, as well as allowing adequate protection from development for the mature trees which edge the site in the south-west corner and an appropriate setback to the cemetery which is within the Conservation Area;

- Creation of a robust eastern edge to Ratho; it currently stops abruptly as a result of recent new development. This should be properly considered during the design process and developed in association with the community;
- Taylor Wimpey is committed to enabling CEC with better links to the active travel network in support of their aspiration that not everyone needs to own a car, as well as supporting provision of a car share scheme where none currently exists in Ratho.



# 7 Conclusions

This report is prepared for the City of Edinburgh Council as part of the response to the Choices for City Plan 2030 (CCP2030) on behalf of Taylor Wimpey (East Scotland) Ltd. It seeks to promote the development of an area of land referred to as Norton Mains, North Ratho. The CCP2030 document and supporting work reviews this site as much of a larger landholding, also referred to as Norton Mains, but including land to the east of this promoted site.

The site would form a natural and sustainable expansion for Ratho, continuing the consolidated form of the village that has evolved over the last 30 years or so. It is located close to a wide range of facilities that would support sustainable living and working within an area that can be reached through sustainable travel means. It is close to existing established residential areas and capable of being well integrated with existing public transport provision and an enhanced active travel network.

The site is relatively contained from view although is visible from parts of the M8 and a section of the Union Canal; mature woodland to the north provides a successful screen and this could be continued along the eastern edge of the proposed development site. A high point within the site would be kept clear of development; partial planting of this would further filter views.

Drainage can be accommodated at the lowest part of the site to the north-east and set within a “green” edge that will form a connected blue-green network via existing watercourses to the north.

The proposed site sits within an existing network of roads, footways, and traffic-free paths which link the site to the surrounding travel and transport network. There is potential to improve access by routing the bus service 20 through the site.

Development of the site would provide around 350-400 new homes within an 8.5Ha net developable area and provide a range of house sizes and typologies. The provision of affordable homes would further increase local choice.

One of the most important parts of this proposal is the area proposed for greenspace community use which would deliver multiple benefits including play, pedestrian and cycle access and growing space amongst other potential uses.

This site therefore offers an attractive option for sustainable living on the edge of the city.

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