

Customer Ref: 01747      Response Ref: ANON-KU2U-GW2C-T  
Name: Stuart Salter  
Response Type: Agent / Consultant  
On behalf of: Wallace Land Investments

Supporting Info: Yes  
Email: stuart@geddesconsulting.com

Choice 1 A

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

Short Response: Not Answered

Explanation: Not Answered

Choice 1 B

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

Short Response: Not Answered

Explanation: Not Answered

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On behalf of:

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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

Choice **1 E**

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

Short Response

Explanation

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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? - Yes / No**

Short Response

Explanation

Choice 1 F

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

Short Response

Explanation

Choice 1 G

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

Short Response

Explanation

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Name   
Response Type   
On behalf of:

Supporting Info   
Email

Choice 1 H

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

Short Response

Explanation

Choice 2 A

**We want all development (including change of use), through design and access statements, to demonstrate how their design will incorporate measures to tackle and adapt to climate change, their future adaptability and measures to address accessibility for people with varying needs, age and mobility issues as a key part of their layouts. - Yes / No**

Short Response

Explanation

Choice 2 B

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

Short Response

Explanation

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On behalf of:

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

Choice **2 D**

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

Short Response

Explanation

Choice **3 A**

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

Short Response

Explanation

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Email

Choice **4 A**

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

Short Response

Explanation

Choice **4 B**

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

Short Response

Explanation

Choice **5 A**

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

Short Response

Explanation

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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

Choice **5 C**

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

Short Response

Explanation

Choice **5 D1**

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

Short Response

Explanation

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Name   
Response Type   
On behalf of:

Supporting Info

Email

Choice 5 D2

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

Short Response

Explanation

Choice 5 E

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

Short Response

Explanation

Choice 6 A

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

Short Response

Explanation

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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

Choice **7 A**

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

Short Response

Explanation

Choice **7 B**

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

Short Response

Explanation

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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:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **8 B**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

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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:   
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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

Choice **10 C**

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

Short Response

Explanation

Choice **11 A**

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

Short Response

Explanation

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Choice 11 B

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

Short Response: Not Answered

Explanation: Not Answered

Choice 12 A

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

Short Response: Option 3 (Blended)

Explanation: Please refer to separate representation on behalf of Wallace Land Investments (ANON-KU2U-GW2N-5).

Choice 12 B1

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

Short Response: Not Answered

Explanation:

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

Supporting Info

Email

Choice **12 B2**

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

Short Response

Explanation

Choice **12 B3**

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

Short Response

Explanation

Choice **12 B4**

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

Short Response

Explanation

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

Supporting Info

Email

Choice **12 B5**

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

Short Response

Explanation

Choice **12 B6**

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

Short Response

Explanation

Choice **12 B7**

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

Short Response

Explanation

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

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:   
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On behalf of:

Supporting Info   
Email

Choice 14 A

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

Short Response

Explanation

Choice 14 B

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

Short Response

Explanation

Choice 14 C

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

Short Response

Explanation

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

Supporting Info

Email

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:   
Name   
Response Type   
On behalf of:

Supporting Info   
Email

Choice **16 A1**

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

Short Response

Explanation

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:   
Name   
Response Type   
On behalf of:

Supporting Info   
Email

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

## Background

- 1.1 Wallace Land Investments (Wallace) is promoting an area of land identified as *South of Lang Loan* (Site Ref: 11) as part of the City of Edinburgh Council's *Choices for City Plan 2030* (Main Issues Report (MIR)) for residential led development.
- 1.2 This Preliminary Education Infrastructure Note (this Note) provides a preliminary assessment of the education infrastructure requirements arising from the impacts from new homes proposed on the site.
- 1.3 As part of the Council's *Choices for City Plan 2030* (Main Issues Report (MIR)), the Council has undertaken a ...*high-level assessment of the new school infrastructure which is likely to be required to support the housing need identified for City Plan*. This high-level assessment is set out in the Council's *Housing Study* (January 2020).
- 1.4 The Council has undertaken a *Greenfield Site Assessment* of *South of Lang Loan* (Site Ref: 11) in preparation of the MIR, presented in its *Housing Study*. The *Greenfield Site Assessment* includes commentary on the sites impact on community infrastructure. It concludes that there is currently insufficient primary and secondary schooling to accommodate the site. Specific challenges raised by the Council are addressed in the following sections of this Note.
- 1.5 The MIR identifies that six new non-denominational primary and two secondary schools will be required to support greenfield allocations in South East Edinburgh. There is no assessment presented to justify this requirement, which would require a substantial level of new housing allocations to support this level of infrastructure. Detailed assessment is required to establish the level of infrastructure as part of the preparation of the Proposed Plan.
- 1.6 Although denominational schooling is not directly addressed in the Council's site assessments, the Council notes that additional denominational primary schools and at least one denominational secondary school will be required in the City.
- 1.7 The Council's high-level assessment is based on the following assumptions, as set out in Section 5 of the *Housing Study*:
- The Council's 2019 (increased) Child per House Ratios (CHRs) have been adopted;
  - The maximum primary school size is a three stream school (630 pupils);
  - The maximum secondary school size is 1,400 pupils; and
  - Greenfield sites have been assessed on the basis of 65 dwellings per hectare and an 80/20 house/flat split.
- 1.8 It is noted that the Council is currently seeking education infrastructure in support of its adopted LDP development strategy based on its 2018 (original) CHRs. These LDP CHRs are lower than the Council's 2019 (increased) CHRs used in the MIR. The Council recently published its *LDP Action Programme 2020*, and does not seek to amend the level of education infrastructure sought for existing allocations following the Council's publication of its 2019 (increased) CHRs.
- 1.9 On this basis, this Note highlights the number of pupils expected from the site applying both the 2018 and 2019 CHRs. However, it is Geddes Consulting's opinion that the 2018 (original) CHRs should currently be used for consistency with the Council's current education infrastructure delivery for the adopted LDP.

- 1.10 It is also noted that the Council have assessed sites based on an aspirational gross 65 dwellings per hectare and an 80/20 house/flat split. This is addressed in more detail in the density analysis submitted in support of this representation. Given the nature of the site and an analysis of the Council's dataset used to determine potential density for comparative sites, it is considered that a net density of 40 dwellings per hectare (dph) is realistic and comparable for the site.
- 1.11 However, it is not physically possible to secure a density of 65 dwellings per hectare without a substantial increase in the proportion of flats. To achieve the Council's potential density, a 67.7/32.5 house flat split is required and not 80:20 as proposed by the Council.
- 1.12 This Note also highlights the number of pupils expected if the net density was increased to 65dph as well as 40dph.
- 1.13 The Council notes that a full Education Assessment will be prepared to assess the impact of pupils from new homes on the education infrastructure as part of the supporting information to be submitted to the Proposed Plan for this site. It is our recommendation that this assessment is undertaken at an early stage, in a transparent manner and with guidance from Scottish Government. It is our opinion that the Council's current assessment of education infrastructure requirements as part of the adopted LDP significantly overstates the scale of education capacity required.

### **Pupils from South of Lang Loan**

- 1.14 The total number of pupils expected from the site, based on 40 and 65dph, are set out in Appendix 1 of this Note. The number of pupils is broken down by level (primary and secondary) and sector (non-denominational and denominational (RC)) for flats and houses.
- 1.15 The tables in Appendix 1 highlight the total number of pupils based on both the Council's 2018 (original) CHRs which are currently used to establish infrastructure requirements for the adopted LDP and the 2019 (increased) CHRs.
- 1.16 It should be noted that the figures presented in Appendix 1 represent the total pupils expected to be generated from the development of the site. Not all of these pupils will be in schools at any one time due to development programming and transitioning of pupils from a school system i.e. P1 to P7 and then onto secondary school.

### **Primary Schooling**

#### **Non-denominational Primary Schooling**

- 1.17 The site is located within the Gilmerton Primary School catchment area. The latest school roll and capacity for the School, as reported by the Council, is set out in the following table:

	<b>2019/20 School Roll</b>	<b>Reported Capacity</b>	<b>%</b>
Gilmerton PS	473	546	87%

Source: Council 2019 School Roll Projections

- 1.18 The School is currently operating at 87% occupancy of its reported capacity and currently has spare capacity for only 73 additional pupils. The Council's *2019 School Roll Projections* project that the School's roll be breached by the 2021/22 School Year. The existing catchment primary school will not have substantial capacity to accommodate future development beyond the impact of the adopted LDP strategy.
- 1.19 The total number of non-denominational primary pupils from the site are set out in Appendix 1 of this Note, based on both options for the site and the Council's CHR's.

- 1.20 The Council is set to open a new two stream primary school in the summer of this year (Broomhills Primary School) to the north west of the site. This School has the capability (as confirmed within the Design and Access Statement which supported the associated Planning Application) to be extended to a three stream school.
- 1.21 It is understood that the Council has also recently advised that the proposed school at Gilmerton Station Road is no longer required to accommodate pupils from new housing from the adopted LDP (As set out in the Development Management Sub-committee Report (18th March 2020). Its future capacity of 210 pupils (and up to 630 pupils) can be used to accommodate pupils from future sites allocated for residential development within the emerging City Plan 2030.
- 1.22 The Council has the option to acquire this 2 ha site to deliver the school at Gilmerton Station Road. This is the same size as the site at Broomhills (Broomhills Primary School). As noted above, Broomhills Primary School has the ability to be extended from a two stream school to a three stream school providing additional working capacity of 210 pupils.
- 1.23 Assuming there is no existing capacity in schools in the local area, there is potential to provide four streams of new primary school accommodation on sites currently available to the Council (three streams at Gilmerton Station Road and one at Broomhills). This is capacity for 840 pupils based on the Council's *working capacity*, which is equivalent to around the pupil generation of 3,000 or more new homes. This is without taking into account the lesser impact of any flats and that not all pupils will require accommodation at one time due to development programming and pupil transitioning. The actual capacity in terms of new homes will be significantly higher, but will require detailed assessment.
- 1.24 It is considered that there is already planned education infrastructure in place which can potentially support the development of the site without any requirement for further new primary schools. Wallace will make a proportionate financial contribution towards increases in capacity at these existing and planned schools, where in accords with the tests of Circular 3/2012.
- 1.25 Further analysis will be required as part of the Proposed Plan when the scale of housing development in the South East Edinburgh area becomes available.

#### **Denominational Primary Schooling**

- 1.26 The site is located within the St Catherine's RC Primary School catchment area. The latest school roll and capacity for the School, as reported by the Council, is set out in the following table:

	<b>2019/20 School Roll</b>	<b>Reported Capacity</b>	<b>%</b>
St Catherine's RC PS	215	210	102%

Source: Council 2019 School Roll Projections

- 1.27 The School is currently operating at 102% occupancy of its reported capacity and currently has spare capacity for only 10 additional pupils. The Council's *2019 School Roll Projections* project that the School will remain over capacity in future years.
- 1.28 It is noted that the Council are proposing to replace the existing school. It may be that the School can be replaced with a higher capacity on the existing site or in a new location within the locality.
- 1.29 It is also noted that it is proposed to extend the adjacent primary school – St John Vianney RC Primary School. Further investigation is also required to establish whether additional capacity could also be provided at this school, including utilisation of catchment area reviews prior to considering a new school.

## Secondary Schooling

### Non-Denominational Secondary Schooling

- 1.30 The site is located within the catchment area of Liberton High School. The latest school roll and capacity for the School, as reported by the Council, is set out in the following table:

	2019/20 School Roll	Reported Capacity	%
Liberton High	667	850	78%

Source: Council 2019 School Roll Projections

- 1.31 The School is currently operating at 78% occupancy of its reported capacity and currently has spare capacity for 183 additional pupils. This existing capacity is equivalent to accommodating pupils generated from around 1,000 new homes in the catchment area, without taking into account the lesser impact of flats, development programming and pupil transitioning.
- 1.32 The Council's *2019 School Roll Projections* project that the School's roll will be breached by the 2022/23 School Year. The Council's projections show an increase of around 200 pupils in three years. While there are a number of concerns regarding the accuracy of the Council's school roll projections, it is accepted that there may be a future capacity constraint at the School.
- 1.33 It is noted that the Council is considering rebuilding Liberton High School, which could potentially open as a joint campus with a dedicated Gaelic language secondary school. It may be possible that additional capacity could be provided as part of the replacement school to serve new homes as part of the emerging City Plan.
- 1.34 Alternatively, If the existing School was extended to 1,200 pupils capacity (from 850 pupils), then it could accommodate pupils from a further 1,750 additional homes, without taking into account the lesser impact of flats, development programming and pupil transitioning.
- 1.35 The Council has highlighted that its preference is to deliver new secondary schools with 1,200 pupil capacity. This is equivalent to pupils from more than 6,000 new homes. Further analysis will be required as part of the Proposed Plan when the scale of housing development in the South East Edinburgh area becomes available.

### Denominational Secondary Schooling

- 1.36 The site is located within the catchment area of St Augustine's RC High School. The latest school roll and capacity for the School, as reported by the Council, is set out in the following table:

	2019/20 School Roll	Reported Capacity	%
Holy Rood RC High	1075	1200	90%

Source: Council 2019 School Roll Projections

- 1.37 The School is currently operating at 90% occupancy of its reported capacity and currently has spare capacity for 125 additional pupils. This existing capacity is equivalent to accommodating pupils generated from around 4,000 new homes in the catchment area, without taking into account the lesser impact of flats, development programming and pupil transitioning.
- 1.38 The Council's *2019 School Roll Projections* project that the School's roll will be breached in the next five years as a result of the existing LDP development strategy and existing trends.
- 1.39 Any new denominational secondary school capacity, including the provision of a new school will require to be addressed at a strategic scale across South East Edinburgh. It is likely that any new school would require a school roll of at least 600 pupils to be viable. This is equivalent to accommodating pupils generated from more than 20,000 new homes in the catchment area.

However, it is noted that the Council's preference is to deliver schools with 1,200 pupil capacity, which would require pupils from more than 40,000 new homes to support it.

- 1.40 It may be that extending existing schools or reviewing catchment areas and admissions policies is a more efficient means to address any future capacity constraints.

### **Conclusions**

- 1.41 The scale of education mitigation as a result of the proposals for the site will be dependant on the scale of development, its density and the rate of development. However, due to the scale of the proposal, education mitigation will be required as a direct and cumulative result of the development.
- 1.42 It is considered likely that non-denominational primary school mitigation can be delivered in four new streams of primary school accommodation at the new Broomhills Primary School and a new primary school at Gilmerton Station Road which the Council can secure a site. Without taking into account existing and potential capacity at existing schools, there is potential to provide at least 840 pupil places on existing sites available to the Council.
- 1.43 It is likely that additional denominational primary school capacity will also be required. Further assessment will be required to establish whether this can be delivered at existing schools through reconfiguration, extension or catchment area review.
- 1.44 There are various options available which will require to be assessed in detail to address any capacity constraints at the non-denominational and denominational secondary schools. If the Council's preference is to deliver new secondary schools in the area, a substantial level of new housing development will be required to deliver a viable school roll.
- 1.45 Education capacity is not a barrier to the allocation of further new housing in the area as the impact of new pupils from the development can be mitigated through the expansion of existing primary school infrastructure and new infrastructure on land already available to the Council. The lack of education constraint in this area is highlighted by the Council's identification of land in this area as suitable for greenfield housing development.
- 1.46 South of Lang Loan is willing to make a proportionate financial contribution towards the cost of providing the necessary education as a result of the direct and cumulative impact of the development in accord with Circular 3/2012.

## Appendix 1 South of Lang Loan Pupil Generation

### 2018 (original) CHRs

Dwelling Type	Primary CHR	Primary ND CHR	Primary RC CHR	Secondary CHR	Secondary ND CHR	Secondary RC CHR
House	0.3	0.26	0.04	0.2	0.17	0.03
Flat	0.07	0.06	0.01	0.03	0.026	0.004

Whole Site		Primary			Secondary		
Type	40dph (net)	Total	ND	RC	Total	ND	RC
Houses	525	158	137	21	105	89	16
Flats	255	18	15	3	8	7	1
Total	780	175	152	24	113	96	17

Whole Site		Primary			Primary		
Type	65dph (net)	Total	ND	RC	Total	ND	RC
Houses	360	108	94	14	72	61	11
Flats	840	59	50	8	25	22	3
Total	1200	167	144	23	97	83	14

### 2019 (increased) CHRs

Dwelling Type	Primary CHR	Primary ND CHR	Primary RC CHR	Secondary CHR	Secondary ND CHR	Secondary RC CHR
House	0.375	0.326	0.049	0.23	0.2	0.03
Flat	0.112	0.097	0.014	0.046	0.04	0.006

Whole Site		Primary			Secondary		
Type	40dph (net)	Total	ND	RC	Total	ND	RC
Houses	525	197	171	26	121	105	16
Flats	255	29	25	4	12	10	2
Total	780	225	196	29	132	115	17

Whole Site		Primary			Primary		
Type	65dph (net)	Total	ND	RC	Total	ND	RC
Houses	360	135	117	18	83	72	11
Flats	840	94	81	12	39	34	5
Total	1200	229	199	29	121	106	16

## South of Lang Loan (Site Ref: 11) Site Assessment Review



### Background

- 1.1 City of Edinburgh Council (the Council) has undertaken a *Greenfield Site Assessment* and a *Site Assessment* (against SEA Objectives) of an area of land identified as *South of Lang Loan* (Site Ref: 11) in preparation of the *Choices for City Plan 2030* (Main Issues Report (MIR)) (2020).
- 1.2 This *Site Assessment Review* relates to the full site area identified as *South of Lang Loan* within the MIR. This site representation is supported by an *Indicative Development Framework* (IDF) and a *Development Framework Report* (DFR).
- 1.3 The *City Plan 2030* will replace the adopted Local Development Plan (LDP) (2016). The Council's latest *Development Plan Scheme* (January 2020) anticipates that the *City Plan 2030* will be adopted by February 2022.
- 1.4 The MIR is the first stage in the Council's consultation process for the emerging *City Plan 2030*. It is therefore the first opportunity for interested parties to contribute to the formulation of the Council's development strategy in the emerging *City Plan 2030*.
- 1.5 The MIR sets out ...*the Council's preferred approach to changing policy in our new plan*. The MIR identifies four key topics. Within each key topic are four choices. These set out the Council's proposed changes to the adopted LDP and at least one reasonable alternative. In total, the MIR identifies 16 *Choices*, including **Choice 12 – Building our new homes and infrastructure**.
- 1.6 **Choice 12 – Building our new homes and infrastructure** sets out how the Council will provide additional homes through the allocation of land for new homes. To do this, the Council will:
- A. *Decide how many homes to provide,*
  - B. *Who will deliver these new homes, and*
  - C. *Where we will deliver the homes in the most sustainable way.*
- 1.7 The MIR identifies three options for how and where new homes will be delivered. These three options are as follows:
- **Option 1 Delivery by the Council and its partners within the Urban Area**
  - **Option 2 Delivery through market housing by releasing Greenfield land**
  - **Option 3 A Blended Approach**
- 1.8 The MIR confirms that the Council's preferred option is Option 1. Option 1 proposes that there will be no release of sites within the designated Green Belt for the delivery of new homes. As recognised within the MIR, Option 1 ...*may not be financially viable for the Council and its partners to deliver, or possible for the Council to achieve an annual delivery rate to prevent the release of further green belt land*.
- 1.9 The Council's preferred Option 1 represents a potential sustainable approach to the delivery of housing requirements through the re-use of brownfield land in urban locations. It however presents a potentially high-risk development strategy for the following reasons:
- As highlighted by the Council, brownfield sites can be associated with high abnormal costs for the future development and consequently, may not be viable. The Council has not assessed the viability of future development on these sites.

- Some of the Council's brownfield sites are currently active employment areas and may not prove to be available for development and thus, not effective housing sites in the future.
- Some large strategic employment areas have a high existing use land value that is more valuable than a potential change of use to residential development. This is due to the valuation of these employment areas which are based on an income in perpetuity investment valuation. These employment areas would therefore prove not be viable for the Council to CPO.
- Brownfield sites can be in multiple ownerships and it may prove necessary to use CPOs to acquire the necessary land for development. This use of CPO powers has the potential to cause delays in the delivery of housing.
- Brownfield sites can often have issues relating to the capacity and availability of existing services. There can also be difficulties in the installation and construction of new services to serve a brownfield site. The availability of land can often be constrained in the vicinity of brownfield sites and this can prevent the ability to expand local infrastructure such as local schools.

1.10 Accordingly, a development strategy based only on urban, brownfield sites may not realise the scale of housing required within the necessary timescale due to ongoing concerns over site effectiveness. This is highlighted by reference to the Council's 2014 *Housing Land Study* and the limited progress made in redeveloping these sites in the interim period. Paragraph 2.2 of the *Housing Study* confirms that sites which remain undeveloped from the 2014 *Housing Land Study* have been carried forward into the *Housing Study*. Given that the balance of these sites have not been developed over the last 5 years, their prospects for future development could be limited.

1.11 Options 2 and 3 propose the release of greenfield land from the Green Belt. In order to deliver the required amount of new homes, there is a requirement to allocate additional greenfield sites in addition to the realistic assessment of those limited number of effective urban sites which can be delivered in the plan period in the defined *Urban Area*.

1.12 All three Options presented in the MIR are supported by maps which identify all sites the Council consider have the ...*potential to deliver our new homes*.

1.13 The site *South of Lang Loan* is identified within **Area 1 – South East Edinburgh** which is shown on Map 10 of the MIR. The supporting text for **Area 1** states that ...*development in the South East could be supported on some, or all of the land identified on Map 10*.

1.14 The Council has carried out detailed site assessments of all sites identified within Map 10 of the MIR. These assessments include consideration of a site's public transport accessibility and an initial education appraisal. These assessments are set out within the *Housing Study* and the *Environmental Report*.

1.15 This representation examines the site's development potential with regard to the Council's defined SEA requirements for the full site identified as forming *South of Lang Loan* within Map 10 of the MIR.

### **Greenfield Site Assessment**

1.16 The Council has published supporting document *Housing Study* (January 2020) in support of the MIR. The *Housing Study*... *sets out the approach to meeting the Outcome of City Plan 2030 to achieve a city in which everyone lives in a home they can afford* (Page 1, *Housing Study*).

1.17 Part 2b *Greenfield Site Assessment* of the *Housing Study* provides an assessment of all greenfield land deemed to have potential for development. These areas of greenfield land are split into 134 *Assessment Sites*, grouped into seven sectors.

1.18 Each of these *Assessment Sites* was analysed by the Council based on its potential for development in the emerging *City Plan 2030* period. The Council's analysis takes the following into account:

- *current use*
- *broad environmental constraints*
- *public transport accessibility*
- *known development interest and planning history*

1.19 Taking these matters into account, the Council then assessed all *Assessment Sites* against the following 14 questions:

1. *Does the site fit within an area identified as a strategic development area?*
2. *Does the site support travel by foot to identified convenience services?*
3. *Does the site support travel by foot to identified employment clusters?*
4. *Does the site have access to the wider cycle network?*
5. *Can the site support active travel overall through appropriate intervention?*
6. *Does the site support travel by public transport through existing public transport network accessibility and capacity?*
7. *Is the site potentially served by an identified public transport intervention project which is deliverable in the plan period to serve and accommodate development?*
8. *Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?*
9. *Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?*
10. *If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?*
11. *Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?*
12. *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?*
13. *Would development of the site avoid identified areas of 'medium-high flood risk; (fluvial) or areas of importance for flood management?*
14. *Is the site suitable for development?*

1.20 The Council assessed each *Assessment Site* against each of the 14 questions using the following ratings:

Yes	
Partially	
No	

1.21 The Council has also provided commentary on why it has attributed a rating against each of the 14 questions.

1.22 The Council's approach does not consider how a proposal for a site will impact upon the rating for each of the questions. The Council's approach is therefore limited in scope but can be considered further to improve its use as a validation tool for use as a site selection tool for future development.

1.23 For example, one of the questions posed by the Council assesses whether the development of a site would support the existing public transport network. The Council's assessment does not consider whether the development of a site will provide improved public transport links, for example the safeguarding of the proposed Park & Ride Facility at Lasswade Road. As shown on the IDF,

the proposal will safeguard the provision of the Park & Ride facility. This will enable residents of *South of Lang Loan* to have an enhanced public transport facility (providing direct access into the city centre) within walking distance of their homes.

- 1.24 Rather, the Council's assessment simply considers a site in isolation, with no consideration of potential mitigation measures or potential added benefits through site development.
- 1.25 *South of Lang Loan* is identified within Sector 2 *South East SDA*. Sector 2 is based on the *South East Edinburgh Strategic Development Area*. This area was identified within SESplan (2013) and the adopted LDP.
- 1.26 The Council's *Greenfield Site Assessment* for the site *South of Lang Loan* is presented in page 53 of the Council's *Housing Study*.
- 1.27 The Council's assessment for *South of Lang Loan* concludes that **...the site is considered suitable for development, despite the effect on the rural edge of the city as seen from the City of Edinburgh Bypass and the nearby Drum Estate** [our emphasis].
- 1.28 The Council's assessment also concludes that *...the rural edge is already greatly diminished by recent development visible over the ridge in this area and there is opportunity to establish a new edge at the City of Edinburgh Bypass*.
- 1.29 For the reasons set out above, this *Greenfield Site Assessment* for *South of Lang Loan* by the Council has been reviewed and updated by Geddes. This review is set out in Appendix 1 of this Assessment.
- 1.30 This review undertaken by Geddes has reassessed the proposal for the site (as presented in the IDF and DFR) against the 14 questions listed above. This review has allowed matters to be taken into account such as the proposal for a connection into the existing cycle network, provision of wildlife corridors, and the inclusion of areas of green space within a proposal.
- 1.31 The re-evaluation undertaken by Geddes (Appendix 1) concludes that the site with its proposal should be considered more favourably in sustainability terms against the 14 questions for the following reasons:
- The proposal set out in the DFR addresses all of the placemaking principles required by the Council and Scottish Ministers. The Council's requirements for *Design and Green/Blue Infrastructure, Transport Infrastructure, Education Infrastructure and Grey Infrastructure* for sites in *Area 1 – South East Edinburgh* have also been taken into account in the proposal shown in the DFR.
  - The DFR prepared in support of this representation provides a detailed response to the findings of the Council's *Landscape and Visual Assessment* (a Background Report prepared in support of the MIR). The Council's *Landscape and Visual Assessment* concludes that the site is not suitable for development. The DFR concludes that the site does provide scope for development through the application of appropriate landscape mitigation measures.
  - The proposals will incorporate significant areas of open space and provide opportunities for the enhancement of the existing Green Network. In total, the proposal may provide around 10 hectares of open space, including over 5 hectares of amenity space.

- The proposal will provide a direct link into the existing cycle network. This will support active travel throughout the site and beyond.

### Site Assessment

1.32 In addition to the *Greenfield Site Assessment* above, the Council has also undertaken a *Site Assessment* for all greenfield sites identified as potential options for development within the MIR. These assessments are contained within the *Environmental Report* which is a Background Report to the MIR.

1.33 All potential option sites were assessed against the following eight environmental indicators:

- **Biodiversity, Fauna and Flora**
- **Population and human health**
- **Soil**
- **Water**
- **Air and Climatic factors**
- **Material Assets**
- **Cultural Heritage**
- **Landscape and Townscape**

1.34 These eight indicators were then split into 28 questions which are set out in Table 5: *Methodology for Assessing Sites* of the Council's *Environmental Report*.

1.35 Each of the sites within the *Environmental Report* were then assessed against each of the 28 questions. The assessment by the Council determined whether each site would have the following outcome against each of the 28 questions.

√	A significant positive environmental effect
X	A significant negative environmental effect
?	Uncertain as to whether any significant positive or negative effects would be likely
-	Neutral or no significant effect is likely

1.36 The Council's *Site Assessment* is limited in its use as it ignores the benefits which are delivered by the proposal on the site. The Council's approach is only focused on the environmental and other characteristics of the site and not how a potential proposal can mitigate or avoid impacts on the site's intrinsic characteristics. The Council's approach can be improved to assist its use as a validation tool for selecting a site for future development.

1.37 The Council's current rating system does not account for the beneficial impacts that the development of a site may deliver through mitigation or improvements. For example, the Council's *Site Assessment* scores the site *South of Lang Loan* as having a neutral impact on access to open space. This rating does not consider the site's proposal and how it can address the requirements set by the Council in terms of its master planning principles. The proposal is shown in the *Indicative Development Framework* (IDF) and explained in a *Development Framework Report* (DFR). Considering a site's proposal will provide information about the scale and accessibility of areas of open space as part of the proposals. It could potentially address any deficiencies in the wider area.

1.38 The Council's rating system does not allow a comparison to be made against other sites being considered for potential development. It is therefore unclear how the Council will confidently identify the preferred sites which should be brought forward for allocation within the emerging *City Plan 2030*.

- 1.39 To assist the Council in its approach, Geddes has undertaken a comparison of each of the potential sites identified in Sector 2. In order for this comparison exercise to be undertaken, Geddes has applied a score-based system to enable a simple comparison of each potential option site. No weighting is given to the scores applied to maintain objectivity.
- 1.40 By applying a simple score-based system, based on the benefits or mitigation being delivered by potential development proposals, it is possible to undertake a more detailed analysis and understanding of a site's future sustainability credentials.
- 1.41 By using this approach, the Council can be confident about identifying the right sites to be allocated for residential development within the emerging *City Plan 2030*.
- 1.42 The simple points-based system applied by Geddes is detailed below. This scoring system (based on a points-based approach) has been attributed to each of the four impact outcomes identified by the Council.

Ranking	Impact	Scoring
√	A significant positive environmental effect	1
-	Neutral or no significant effect is likely	0
X	A significant negative environmental effect	-1
?	Uncertain as to whether any significant positive or negative effects would be likely	N/A <sup>1</sup>

- 1.43 Sites with proposals which are more sustainable will score higher. For example, a site with a score of 8 is more sustainable than a site with a score of -6. By applying this approach to the Council's *Site Assessment*, it is possible to attribute an overall score to the site *South of Lang Loan*. This scoring system has also been applied to the other four sites identified as potential options for development within the Sector 2 Area. This scoring system uses the same ratings applied by the Council to each site. This comparative scoring is presented in the following table:

CEC SEA Assessments		
Site	Overall Score	Average score per outcome
South of Lang Loan	-5	-0.18
South of Gilmerton Station Road	-6	-0.21
Drum South (South East)	-6	-0.21
Drum North (South East)	-9	-0.32
South of Lang Loan	-5	-0.18

- 1.44 The findings from this analysis presented in the table confirms that, based on the Council's *Site Assessments*, the site *South of Lang Loan* scores favourably against the other sites within Sector 2. The negative scoring arises for each site because the Council has focused on identifying environmental risks associated with the site based characteristics and issues, rather than the site's attributes and future benefits which can be realised through future development.
- 1.45 For the reasons set out above, Geddes has also undertaken a revised assessment of the site at *South of Lang Loan* against the 28 indicators identified within the *Environmental Report*.
- 1.46 This updated Site Assessment by Geddes takes into account the mitigation measures presented as part of the indicative proposal in the IDF submitted in support of this Representation. This includes the delivery of areas of open space and green space (including recreational spaces) to mitigate landscape character.

<sup>1</sup> No scoring has been attributed to this impact as no effects (positive or negative) are known at this time.

- 1.47 The proposal will also incorporate the formation of a robust Green Belt boundary along the southern edge of the site. This Green Belt boundary will be formed by a 30m tree belt. This tree belt will act as an identifiable and permanent visual boundary marker for the Green Belt's inner boundary in accord with paragraph 51 of Scottish Planning Policy (SPP) 2014.
- 1.48 The explanation and justification for the revised assessment against each of the 28 questions is also provided in Appendix 2.
- 1.49 This revised Site Assessment undertaken by Geddes concludes that the proposal for the site scores more favourably against the 28 questions (than the Site Assessment undertaken by the Council) for the following reasons:
- The proposal set out in the DFR addresses all of the placemaking principles required by the Council and Scottish Ministers. The Council's requirements for *Design and Green/Blue Infrastructure, Transport Infrastructure, Education Infrastructure and Grey Infrastructure* for sites in *Area 1 – South East Edinburgh* have also been taken into account in the proposal.
  - The proposal will deliver improved accessibility to public transport. The proposal will also provide links into the existing cycle network. This will encourage active travel both within and outwith the site.
  - The development of the site will provide areas of accessible open space, greenspace and recreational provision. In total, the proposal may provide around 10 hectares of open space, of which 5.7 hectares is dedicated amenity space. The proposal will incorporate a SuDS strategy which will include the discharge of surface water at greenfield rates. This will prevent increased flooding as a result of climate change.
- 1.50 The comparison table for all sites within Sector 2 is shown below. This also includes the results of the revised scoring attributed by Geddes to the site.

CEC SEA Assessments		
Site	Overall Score	Average score per outcome
South of Lang Loan	-5	-0.18
South of Gilmerton Station Road	-6	-0.21
Drum South (South East)	-6	-0.21
Drum North (South East)	-9	-0.32
South of Lang Loan	-5	-0.18
Geddes Site Assessment		
South of Lang Loan Revised	8	0.29

- 1.51 These findings demonstrate that the site *South of Lang Loan* can be considered a more sustainable location for future development than that assessed by the Council. This takes into account the benefits and the mitigation measures that will be delivered by a proposal on the site. This site assessment has not been applied to the other sites as the respective mitigation for each site is not known.

## Conclusion

- 1.52 The Council's *Greenfield Site Assessment* and *Site Assessment* (against SEA objectives) have been reviewed as part of this Assessment in order to assist the Council in its consideration of the site and proposal at *South of Lang Loan* (Site Ref: 11).

- 1.53 This will help ensure that only those sites with strong SEA credentials and site-specific sustainability credentials are selected as part of the emerging Proposed Plan.
- 1.54 The examination of the Council's *Site Assessments* conclude that this site can be evaluated more favourably than as presented in the Council's current assessments. These revised assessments have been undertaken using the mitigation and improvements set out in the proposal in the supporting IDF. A DFR has also been produced which explains the proposal for the site and confirms these sustainable measures.
- 1.55 Based on the findings of these revised assessments, the site *South of Lang Loan* (Site Ref: 11) is a considered to be a sustainable development proposal. The revised assessments also demonstrate that the site scores favourably when assessed against other identified sites within the Sector 2 area.
- 1.56 The proposal at *South of Lang Loan* (Site Ref: 11) is an example of sustainable development as demonstrated by the updated Site Assessment undertaken by Geddes. Page 3 of the MIR states that to meet the Council's objectives the *...future growth of our city must meet our ambitions to be a sustainable city with the right types and quality of new homes and neighbourhoods, in the right locations, with the right infrastructure.*
- 1.57 The development of *South of Lang Loan* (Site Ref: 11) will contribute to this objective.
- 1.58 There are no planning or environmental reasons why *South of Lang Loan* (Site Ref: 11) should not be allocated for housing in the emerging *City Plan 2030*.

## Appendix 1 Revised Greenfield Site Assessment

### Geddes Consulting Re-Evaluation for South of Lang Loan

Question	Geddes Consulting Commentary	Council's Scoring	Alternative Scoring
<b>SDP1 SDA Areas</b>			
<i>Does the site fit within an area identified as a strategic development area?</i>	Agree with the Council's assessment. The site is located within a <i>Strategic Development Area</i> .	Yes	Yes
<b>Active Travel</b>			
<i>Does the site support travel by foot to identified convenience services?</i>	Agree with the Council's assessment. The development of the site (as shown within the IDF) will encourage the provision of additional convenience services within the area. This will encourage active travel.	Partially	Partially
<i>Does the site support travel by foot to identified employment clusters?</i>	The site does not currently support travel by foot to identified employment clusters.	No	No
<i>Does the site have access to the wider cycle network?</i>	<p>Access to the wider cycle network will be provided as part of the development of the site. As identified within the Council's Assessment, there are plans in place for an improvement to the existing cycle network. This will connect the South East of Edinburgh to the wider cycle network via Old Dalkeith Road and the Bioquarter. An existing cycle path also runs adjacent to the site (along the southern boundary) as confirmed within the <i>Housing Study</i>. As noted within the Council's Assessment, this will connect with the planned town centre and employment site in Shawfair, Midlothian.</p> <p>As shown within the IDF, it is proposed that a direct connection will be provided into the existing cycle path.</p> <p>The development of the site will provide a direct access to the wider cycle network.</p> <p>The Council's scoring should be amended to reflect the above.</p>	Partially	Yes
<i>Can the site support active travel overall through appropriate intervention?</i>	<p>The proposal will provide a direct link into the existing cycle network. This will support active travel throughout the site and beyond.</p> <p>The <i>Active Travel Map</i> on page 42 of the <i>Housing Study</i> also identifies indicative active travel improvements to the immediate south of the site. These improvements will further support active travel from the site to the surrounding area and beyond.</p> <p>The Council's scoring should be amended to reflect the above.</p>	No	Partially
<b>Public Transport</b>			
<i>Does the site support travel by public transport through existing public transport network accessibility and capacity?</i>	<p>The site <i>South of Lang Loan</i> is identified as being adjacent to Corridor 4: <i>City centre to Easter Bush / Straiton</i> of the <i>Edinburgh Strategic Transport Study Phase 1 Report</i>.</p> <p>Figure 4-6: <i>Accessibility (Journey Time) to the City Centre</i> of the Report identifies the site South of Lang Loan as having a journey time of between 30 – 40 minutes to the city centre. Figure 4-9: <i>AM Base Model number of buses</i></p>	No	Partially

	<p><i>per hour</i> of the Report identifies that there are between 2 – 15 bus services per hour along Lasswade Road. Lasswade Road bounds the eastern edge of the site. Existing bus stops along Lasswade Road (within walking distance of the site) provide existing public transport links into the city centre. The number 31 bus route provides a regular service into the city centre.</p> <p>The X31 bus route also travels along Lasswade Road. The X31 bus service provides further links between the site and the city centre.</p> <p>The Council's scoring should be amended to reflect the above.</p>		
<p><i>Is the site potentially served by an identified public transport intervention project which is deliverable in the plan period to serve and accommodate development?</i></p>	<p>As noted above, the number 31 and the number X31 bus routes provide regular bus services into the city centre.</p> <p>The MIR proposes to safeguard sites for new Park and Ride facilities at Gilmerton Road and Lasswade Road. The safeguarded facility at Lasswade Road is located within the corner of the <i>South of Lang Loan</i> site (as identified on page 20 of the MIR). The provision of this facility will provide residents of the <i>South of Lang Loan</i> proposal with direct access to a major public transport intervention project. The Park &amp; Ride facility can be delivered within the plan period to serve and accommodate existing and proposed development.</p> <p>In combination with the safeguarded Park &amp; Ride facility at Gilmerton Road, the facility will provide enhanced public transport services into the city centre.</p> <p>The Council's scoring should be amended to reflect the above.</p>	No	Yes
<b>Community Infrastructure</b>			
<p><i>Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?</i></p>	<p>The site is located within the following primary school catchment areas:</p> <ul style="list-style-type: none"> <li>• Gilmerton Primary School (Non-Denominational); and</li> <li>• St Catherine's RC Primary School (Denominational).</li> </ul> <p>The Council is set to open a new two stream primary school in the summer of this year (Broomhills Primary School). This School has the capability (as confirmed within the <i>Design and Access Statement</i> which supported the associated Planning Application) to be extended to a three stream school.</p> <p>A <i>Development Management Sub-Committee Report</i> (18<sup>th</sup> March 2020) has confirmed that the need for this new school <i>...may not arise</i> t as a result of the proposed development in the adopted LDP. Its future capacity of 210 pupils (and up to 630 pupils) can be used to accommodate pupils from future sites allocated for residential development within the emerging City Plan 2030.</p> <p>The Council has the option to acquire this 2 ha site to deliver the school at Gilmerton Station Road. This is the same size as the site at Broomhills (Broomhills Primary School). As noted above, Broomhills Primary School has the ability to be extended from a two stream school to a three stream school providing additional working capacity of 210 pupils.</p> <p>It is considered that there is already planned and future education infrastructure in place which can potentially support the development of land <i>South of Lang Loan</i> – potentially without any requirement for further new primary schools but funding an increase in capacity at existing or planned schools.</p> <p>The Council's scoring should be amended to reflect the above.</p>	No	Partially
<p><i>Does the site have sufficient secondary school</i></p>	<p>The site is located within the following secondary school catchment areas:</p>		

<p><i>infrastructure capacity to accommodate the development without further intervention?</i></p>	<ul style="list-style-type: none"> <li>• Liberton High School (Non-Denominational); and</li> <li>• Holy Rood RC High School (Denominational).</li> </ul> <p>The catchment non-denominational secondary school is Liberton High School. The reported working capacity of Liberton High School is 850 pupils. This School is capable of accommodating more pupils if an extension is considered. If the School was extended to accommodate 1,200 pupils then it could accommodate pupils from a further 1,750 additional homes – potentially more pupils depending on the future mix between houses and flats proposed in the MIR.</p> <p>The Council's scoring should be amended to reflect the above.</p>	No	Partially
<p><i>If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?</i></p>	<p>For the reasons set out above, it is considered that there is existing and planned primary schools to support the level of development proposed on land <i>South of Lang Loan</i>. Further financial contributions would be required to increase the scale of accommodation at Broomhills and Gilmerton Station Road Primary Schools as assessed.</p> <p>The planning capacity of the existing secondary schools at Liberton High School and Gracemount High School should be examined to determine what capacity for future pupils from new homes is required and whether there is scope to extend these existing Schools.</p> <p>Should it be determined that there is a requirement to increase the current pupil capacity of existing school infrastructure (either through an extension to an existing school or the construction of a new school), then Wallace Land Investments will make a financial contribution to the delivery of additional school infrastructure.</p> <p>The Council's scoring should be amended to reflect the above</p>	Partially	Yes
<b>Landscape Character</b>			
<p><i>Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?</i></p>	<p>The proposal will not result in any physical or perceived coalescence. The City Bypass which runs adjacent to the southern boundary of the site provides a permanent and defensible Green Belt boundary. This will provide ...<i>clearly identifiable visual boundary markers</i> as required by Scottish Planning Policy 2014 (page 15).</p> <p>The proposal (as shown within the IDF) will incorporate a significant area of tree planting along the southern boundary of the site.</p> <p>The <i>Landscape and Visual Assessment</i> (2019) prepared on behalf of the Council, states there is ...<i>no scope for development on this site</i>.</p> <p>The DFR prepared in support of this representation provides a detailed response to the findings of the <i>Landscape and Visual Assessment</i>. The DFR concludes that the site does provide scope for development through the application of appropriate mitigation measures as set out in the proposal.</p> <p>The Council's scoring should be amended to reflect the impact of appropriate mitigation measures in the proposal which will minimise any impacts on landscape character.</p> <p>The Council's scoring should be amended to reflect the above</p>	No	Yes
<b>Green Network</b>			
<p><i>Would development of the site avoid</i></p>	<p>The proposals will incorporate significant areas of open space and provide opportunities for the enhancement of</p>		

<p><i>significant loss of landscape-scale land identified as being of existing or potential value for the strategic green network?</i></p>	<p>the existing Green Network. In total, the proposal will deliver over 10 hectares of open space, including nearly 6 hectares of amenity space.</p> <p>As identified within the IDF, the proposal will incorporate green corridors through the site which will connect into the wider green network. This will improve opportunities for biodiversity and provide wildlife corridors.</p> <p>It is noted that the Council's assessment notes that the site is identified as a green network opportunity. The proposal for South of Lang Loan may deliver up to 10hectares of open space. This proposed open space will provide opportunities to link into the wider Green Network.</p> <p>The development of the site will avoid the significant loss of landscape-scale land.</p> <p>It is considered that the Council's scoring should be amended to reflect the above.</p> <p>The Council's scoring should be amended to reflect the above</p>	<p>Partially</p>	<p>Yes</p>
<p><b>Flood Risk</b></p>			
<p><i>Would development of the site avoid identified areas of 'medium-high flood risk; (fluvial) or areas of importance for flood management?</i></p>	<p>Agree with the Council's assessment. The site is not at risk of flooding as confirmed by a review of the online SEPA flood mapping tool.</p>	<p>Yes</p>	<p>Yes</p>
<p><b>Summary Comments</b></p>			
<p><i>Is the site suitable for development?</i></p>	<p>Agree with the Council assessment. The land <i>South of Lang Loan</i> is a suitable site for residential development.</p>	<p>Yes</p>	<p>Yes</p>

## Appendix 2 Revised Site Assessment (against SEA objectives)

Site Ref	Site Name	Promoter	Biodiversity					Population				Soil	Water			Air & Climate				Material Assets		Heritage						Landscape			
			B1	B2	B3	B4	B5	P1	P2	P3	P4	S1	W1	W2	A1	A2	A3	A4	M1	M2	H1	H2	H3	H4	H5	H6	L1	L2	L3	L4	
11	South of Lang Loan (Council's Scoring)	Wallace Land Investments	-	-	-	-	-	-	-	X	-	X	-	-	X	X	?	-	-	-	-	-	-	-	X	-	-	-	-		
11	South of Lang Loan (Revised Scoring)	Wallace Land Investments	-	-	-	-	-	-	-	√	√	X	√	√	-	-	-	√	√	√	-	-	-	-	-	-	√	-	√		

### Scoring Justification for South of Lang Loan against SEA Objectives

Biodiversity	Population	Soil	Water	Air & Climate	Material Assets	Heritage	Landscape
<p><b>B1 – Would the site protect and or enhance the integrity of a European and/or National designated biodiversity site?</b></p> <p>A review of SNH's online mapping tool <i>Site Link</i> confirms that there are no European or National designated biodiversity sites within the site.</p> <p><b>B2 – Would the site protect and or enhance the integrity of local biodiversity sites and wildlife sites?</b></p> <p>There are no local biodiversity sites or wildlife sites located within the development proposal.</p> <p><b>B3 – Would the site protect and or enhance the integrity of existing habitat networks and other wildlife corridors?</b></p> <p>The proposal will have no impact upon existing habitat networks or wildlife corridors.</p> <p>The proposal includes a wildlife corridor as a 30m tree belt along the edge of the City Bypass.</p> <p>A major addition (totalling 10.25 hectares) to the City's Green Network is proposed through the site.</p> <p><b>B4 – Would the site protect and or enhance wildlife species?</b></p> <p>There are no known wildlife species within the site. A Phase 1 Ecological Assessment will be undertaken at the appropriate time (in support of a Planning Application). This will identify the presence or otherwise of protected species on site.</p> <p>Appropriate mitigation will be incorporated into the proposal should any protected species be</p>	<p><b>P1 – Would the site be located away from the regulated site which would increase the population affected by nuisance (odour, noise), poor air quality or regulated major hazard?</b></p> <p>The proposal will incorporate an appropriate stand-off area from the City Bypass to ensure that residents will not be affected by traffic noise or poor air quality.</p> <p>The site is not located within an <i>Air Quality Management Area</i>.</p> <p><b>P2 – Would the site have an impact on designated quiet areas or noise management areas?</b></p> <p>The site is not located within a designated quiet area or noise management area.</p> <p><b>P3 – Would the site provide opportunities for active travel or recreation?</b></p> <p>Access to the wider cycle network will be provided as part of the development of the site. This will include a connection into the existing cycle network runs to the south of the site.</p> <p>The <i>Cycle Streets</i> website identifies Lasswade Road as a <i>Local Cycle Network</i>. The close proximity of an existing cycle network to the site will encourage active travel.</p> <p>The scoring for this criterion should be amended to a positive score.</p> <p><b>P4 – Would the site provide opportunities for social interaction and inclusion?</b></p> <p>The proposals will incorporate areas of open space and green space. This will encourage social</p>	<p><b>S1 – Would the site be located on brownfield land?</b></p> <p>The site <i>South of Lang Loan</i> is not identified as a brownfield site.</p> <p>Part of the site was formerly in use as a quarry. Any areas of made ground will be utilised as open space with appropriate remediation to ensure no harmful pathways.</p> <p>The scoring for this criterion should be amended to a positive score.</p> <p><b>W2 – Does the site add to flood risk or reduce flood storage capacity?</b></p> <p>As identified within the <i>Greenfield Site Assessment</i> undertaken by the Council (page 54 of the <i>Housing Study</i>), the site has no areas of medium-high flood risk as identified on the online SEPA flood mapping tool.</p> <p>The proposal will incorporate a SuDS strategy which will ensure that all surface water discharge is at greenfield rates in accord with SEPA guidance.</p> <p>The scoring for this criterion should be amended to a positive score.</p>	<p><b>W1 – Does the site protect and enhance the water status of major water bodies?</b></p> <p>There will be two levels of SuDS treatment before surface water is discharged from the site. This will protect any nearby water bodies and ensure there is no degradation of the existing water quality.</p> <p>The scoring for this criterion should be amended to a positive score.</p> <p><b>W2 – Does the site add to flood risk or reduce flood storage capacity?</b></p> <p>As identified within the <i>Greenfield Site Assessment</i> undertaken by the Council (page 54 of the <i>Housing Study</i>), the site has no areas of medium-high flood risk as identified on the online SEPA flood mapping tool.</p> <p>The proposal will incorporate a SuDS strategy which will ensure that all surface water discharge is at greenfield rates in accord with SEPA guidance.</p> <p>The scoring for this criterion should be amended to a positive score.</p>	<p><b>A1 – Does the site provide good accessibility to public transport?</b></p> <p>It does as existing bus stops are located along Lasswade Road (within walking distance of the site). These bus stops provide existing public transport links into the city centre. The number 31 bus route provides a regular service into the city centre.</p> <p>The X31 bus route also travels along Lasswade Road. The X31 bus service provides further links between the site and the city centre.</p> <p>The development of the site offers the opportunity to improve existing accessibility to public transport within the area.</p> <p>The proposal also includes for the safeguarding of the proposed Park &amp; Ride Facility at Lasswade Road (as identified on page 20 of the MIR).</p> <p><b>A2 – Does the site provide good accessibility to active travel networks?</b></p> <p>It does as the proposal will provide a direct link into the existing cycle network. This will support active travel throughout the site and beyond.</p> <p>The <i>Active Travel Map</i> on page 42 of the <i>Housing Study</i> also identifies indicative active travel improvements to the immediate south of the site. These improvements will further support active travel from the site to the surrounding area and beyond.</p> <p>The Council's scoring should be amended to reflect the above.</p> <p><b>A3 – Does the site affect existing</b></p>	<p><b>M1 – Does the site result in the loss of/have adverse effects on open space?</b></p> <p>The creation of significant areas of open space and green space, along with tree planting will enhance the biodiversity of the site.</p> <p>The proposal will deliver an additional 10.25 hectares of open space within the City.</p> <p>The Council's scoring should be amended to reflect the positive benefits the development of the site will provide.</p> <p><b>M2 – Does the site provide access to open space, greenspace/recreational provision?</b></p> <p>The development of the site will provide areas of open space and green space in accord with the Council's guidance.</p> <p>The Council's scoring should be amended to reflect the positive impacts the development will have on access to open and green space.</p>	<p><b>H1 – Does the site have significant effects on Listed buildings and their settings?</b></p> <p>A review of the online mapping tool <i>Pastmap</i> has confirmed that there are no Listed Buildings within the site.</p> <p>The development of the site will therefore have no significant effects on a Listed building or its setting.</p> <p><b>H2 – Does the site have significant effects on scheduled monuments and their settings?</b></p> <p>A review of the online mapping tool <i>Pastmap</i> has confirmed that there are no scheduled monuments within or nearby the site.</p> <p>The development of the site will therefore have no significant effects on a scheduled monument or its setting.</p> <p><b>H3 – Does the site have significant effects on conservation areas?</b></p> <p>The site is not located within or in nearby a conservation area.</p> <p>The development of the site will therefore have no significant effects on a conservation area.</p> <p><b>H4 – Does the site have significant effects on the outstanding value of the World Heritage Sites?</b></p> <p>The site is not located within or nearby a World Heritage Site.</p> <p>The development of the site will therefore have no significant effects on a World Heritage Site.</p> <p><b>H5 – Does the site have significant effects on Historic</b></p>	<p><b>L1 – Does the site have significant effects on the landscape setting of the city or its townscape?</b></p> <p>As demonstrated within the DFR, the development of the site will not have significant effects on the landscape setting of the city or its setting.</p> <p><b>L2 – Does the site enable clear and defensible green belt boundaries to be formed?</b></p> <p>The development of land <i>South of Lang Loan</i> will provide a clear and defensible Green Belt boundary. As demonstrated within the IDF and explained within the DFR, this will be formed by a landscape buffer along the southern edge of the site.</p> <p>The City Bypass beyond will also prevent any further development to the south of the site.</p> <p>The scoring for criterion L2 should be amended to reflect this position.</p> <p><b>L3 – Does the site have significant effects on the designated landscape areas?</b></p> <p>The site is not located within a designated landscape area.</p> <p><b>L4 – Does the site support the delivery of the green network?</b></p> <p>The proposals will incorporate areas of open space and provide opportunities for the enhancement of the existing Green Network. As</p>

<p>found to use the site.</p> <p><b>B5 - Would the site protect and or enhance ancient woodland?</b></p> <p>There are no areas of ancient woodland on or nearby the site. The development of the site will therefore have no impact upon areas of ancient woodland.</p>	<p>interaction between residents of the site and the wider community.</p> <p>The proposals will also incorporate the required level of affordable housing.</p>			<p><b>AQMAs?</b></p> <p>The site <i>South of Lang Loan</i> is not within an existing Air Quality Management Area (AQMA). The scoring for criterion A3 should be amended to reflect this lack of impact.</p> <p><b>A4 – Does the site prevent increased flooding or instability as a result of climate change?</b></p> <p>SEPA's online flood mapping tool confirms that the site has no areas of medium-high flood risk.</p> <p>The SuDS strategy will ensure that surface water run-off is at greenfield rates.</p> <p>The scoring for this criterion should be amended to a positive score.</p>		<p><b>Gardens and Designed Landscapes?</b></p> <p>The site is not located within or nearby a Historic Garden or a Designed Landscape.</p> <p>The development of the site will therefore have no significant effects on either of these designations.</p> <p><b>H6 – Does the site have significant effects on non-designated heritage assets?</b></p> <p>As identified within the Council's assessment, there is a non-designated heritage asset (former quarry) within the site extents.</p> <p>The proposal will not have an effect on this non-designated asset.</p> <p>The scoring for criterion H6 should be amended to reflect this.</p>	<p>identified within the IDF, the proposal will incorporate green corridors through the site which will connect into the wider green network.</p>
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## South of Lang Loan (Site Ref: 11) Site Effectiveness Statement

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### Introduction

Scottish Government requires local authorities to ensure that housing sites allocated in the development plan are effective and can contribute completions during the development plan period. An effective housing land supply is essential to delivering a viable development plan.

The overall level of programmed annual completions from all sites in the effective land supply needs to be sufficient to maintain a five year effective land supply at all times and meet the identified housing requirement in the approved development plan in full, as well as meeting any identified shortfall. These policy requirements are set by Scottish Government in *Scottish Planning Policy* (SPP).

A council needs to be satisfied through its own appraisal, that any site to be allocated in the development plan is effective. This appraisal should follow the guidelines set out in PAN 2/2010 *Affordable Housing and Housing Land Audits*, which includes a series of criteria to test whether a site is effective.

Where a five year effective housing land supply is not maintained at all times, SPP states that development plan policies in relation to the housing supply will be considered out of date and there will be a presumption in favour of sustainable development. Where a five year effective land supply is not maintained, additional housing sites will need to be brought forward to address the identified shortfall. Any additional sites should demonstrate that they are effective and capable of delivering completions within a five year period.

For effective sites, a conclusion should also be reached as to the overall construction period (taking account of the developer's or house builder's lead-in period). This construction timeframe will then define the annual rate of completions expected across the local authority and housing sub-market area. Currently, most house builders will expect to deliver an annual house sale rate of at least 3 homes per month (36 sales per annum) on average. Any affordable housing built would be in addition to this.

### Outcome

Based on appraisal of the criteria in PAN 2/2010, the allocation of *South of Lang Loan* (Site Ref: 11) for around 780 homes is an effective site. This is based a site density of 40 homes per net developable hectare. This is based on the Council's data about historic densities for greenfield developments.

It is envisaged that the site will be developed by at least two housebuilders and an affordable housing provider. Based on two housebuilders developing the site, up to 80 market homes will be built per annum with affordable housing being built in proportion at a rate of around 40 completions annually. The development would be built in a seven year period based on this building rate and a two year lead-in period.

The indicative programme for development is set out in the table below.

Development Year	1	2	3	4	5	6	7	Total
<b>Total</b>	<b>60</b>	<b>120</b>	<b>120</b>	<b>125</b>	<b>125</b>	<b>125</b>	<b>105</b>	<b>780</b>

This Statement demonstrates how the proposal is an effective site in accord with the tests of PAN 2/2010.

### Appraisal

This conclusion is based on the following analysis.

Criteria	Response	Comment
<b>Ownership:</b> <i>the site is in the ownership or control of a party which can be expected to develop it or to release it for development. Where a site is in the ownership of a local authority or other public body, it should be included only where it is part of a programme of land disposal</i>	The site is being promoted by Wallace Land Investments, an experienced land promoter and willing seller with a proven track record for delivering completions on consented sites within short timeframes. The site is therefore in the control of ...a party which can be expected to develop it or to release it for development... and is in accord with PAN2/2010 in this respect.	<b>Complies</b>
<b>Physical:</b> <i>the site, or relevant part of it, is free from constraints related to slope, aspect, flood risk, ground stability or vehicular access which would preclude its development. Where there is a solid commitment to removing the constraints in time to allow development in the period under consideration, or the market is strong enough to fund the remedial work required, the site should be included in the effective land supply.</i>	<p>Adverse development factors give rise to abnormal development costs which can affect the viability of a site and hence its effectiveness.</p> <p>The site's topography is sloping gently north-west to south-east. The gradients across the site do not give rise to cut and fill requirements which would have a significant adverse impact on the site's abnormal costs.</p> <p>A review of SEPA's online mapping tool confirms that the site is not at medium-high risk of flooding. SuDS measures will be incorporated within the proposal to attenuate surface water run-off to greenfield rates. No homes will be at risk from flooding and the risk of flooding will not be increased outwith the site.</p> <p>The site is primarily in agricultural use, which is not anticipated to give rise to abnormal levels of contamination. A desk top study has been undertaken for ground conditions including any mining works (surface and underground). A review of The Coal Authority's online <i>Interactive Map</i> identifies that areas of the site are located within a <i>Development High Risk Area</i>. The Coal Authority's <i>Interactive Map</i> also identifies the presence of mine entries within the eastern part of the site.</p>	<b>Complies</b>

	<p>Surface and underground workings will be fully investigated as part of the site investigations and full mitigation provided. This will include the preparation of a <i>Coal Mining Risk Assessment</i>.</p> <p>Ground conditions are also known from the investigations on adjacent sites. An intrusive site investigation will be undertaken to confirm whether or not any mitigation will be required in relation to ground contamination.</p> <p>Four accesses to the site can be provided from Lang Loan and Lasswade Road along the northern and eastern boundaries of the site. All land required to take access into the proposal is under the control of Wallace Land Investments.</p> <p>There are no areas with an ecological designation on the site. An <i>Ecological Report</i> will be provided as part of a planning application for the proposal, which will set out any required mitigation measures in relation to protected species.</p> <p>There are no physical constraints which would inhibit the delivery of all utilities on the site.</p> <p>There are no physical constraints or engineering works on this site that would generate un-viable abnormal costs or prevent development in accord with the proposed <i>Indicative Development Framework</i></p>	
<p><b>Contamination:</b> <i>previous use has not resulted in contamination of the site or, if it has, commitments have been made which would allow it to be developed to provide marketable housing.</i></p>	<p>An intrusive site investigation will be undertaken prior to development and in consultation with the Council. Any remediation will be undertaken prior to development or occupation, depending on the nature and extent of any contamination.</p> <p>It is, however, not expected that there is significant contamination present on the site that will prevent the development of marketable housing. The proposal therefore complies with PAN 2/2010 in this respect.</p>	<p><b>Complies</b></p>
<p><b>Deficit Funding:</b> <i>any public funding required to make residential development economically viable is committed by the public bodies concerned;</i></p>	<p>Wallace Land Investments is promoting the development of this site for new homes. The proposal will be funded privately and no funding from the public sector is required to make the development viable.</p> <p>Developer contributions from the proposal will be made available to fund any proportionate share of upgrades to services, along with financial contributions from any other sites allocated in the surrounding area to deliver any shared infrastructure upgrades.</p> <p>Developer contributions will be in accord with the tests set out in Planning Circular 3/2012: <i>Planning Obligations and Good Neighbour Agreements</i>.</p>	<p><b>Complies</b></p>
<p><b>Marketability:</b> <i>the site, or a</i></p>	<p>The area is a marketable location with significant demand for both market and affordable homes. This is</p>	<p><b>Complies</b></p>

<p><i>relevant part of it, can be developed in the period under consideration;</i></p>	<p>confirmed by the ongoing scale of residential developments within the South East Edinburgh area.</p> <p>There is considerable interest from house builders to develop in this location as this is a prime location for private housing.</p> <p>The presence of overground pylons in this location will not affect the marketability of houses. This will be ensured by applying the required industry standard stand-off as shown within the <i>Indicative Development Framework</i>.</p> <p>Following the adoption of the emerging <i>City Plan 2030</i>, it is expected that the development would be completed within seven years of commencement. This is within the period under consideration of <i>City Plan 2030</i>.</p>	
<p><b>Infrastructure:</b> <i>the site is either free of infrastructure constraints, or any required infrastructure can be provided realistically by the developer or another party to allow development;</i></p>	<p>The site is free from any absolute infrastructure constraints and financial contributions can be made available to fund any required infrastructure upgrades in accord with the tests set out in Circular 3/2012. The proposal is therefore in accordance with the infrastructure criteria of PAN2/2010.</p>	<p><b>Complies</b></p>
<p><b>Land Use:</b> <i>housing is the sole preferred use of the land in planning terms, or if housing is one of a range of possible uses other factors such as ownership and marketability point to housing being a realistic option.</i></p>	<p>Wallace Land Investments is committed to delivering residential development on the site. The proposal includes a full range of housing tenures to create a socially inclusive community, including the percentage of affordable homes in line with the Council's requirements , in a sustainable location.</p>	<p><b>Complies</b></p>

## Choice 12 - Building our new homes and infrastructure

12C. Do you have a greenfield site you wish us to consider in the proposed Plan?

Wallace Land Investments (Wallace) supports the identification of South of Lang Loan (Site Ref: 11) as a potential allocation for housing development in City Plan 2030.

This representation is supported by the following technical assessments and documents:

- Indicative Development Framework;
- Development Framework Report;
- Site Assessment Review;
- Site Effectiveness Statement; and
- Preliminary Education Infrastructure Note.

The supporting Development Framework Report confirms that the proposal will:

- deliver around 780 homes along with a greenspace network comprising public open space and structure planting.
- deliver improved accessibility to bus services as well as proposed and existing local services and amenities, including a potential new park and ride facility. The proposal will also provide links into the existing cycle network, encouraging active travel both within and outwith the site.
- provide areas of accessible open space, greenspace and recreational provision. In total, the proposal may provide around 10 hectares of open space, of which 5.7 hectares is dedicated amenity space. The proposal will incorporate a SuDS strategy which will include the discharge of surface water at greenfield rates. This will prevent increased flooding as a result of climate change.
- be in keeping with the character of the surrounding urban and local landscape context.

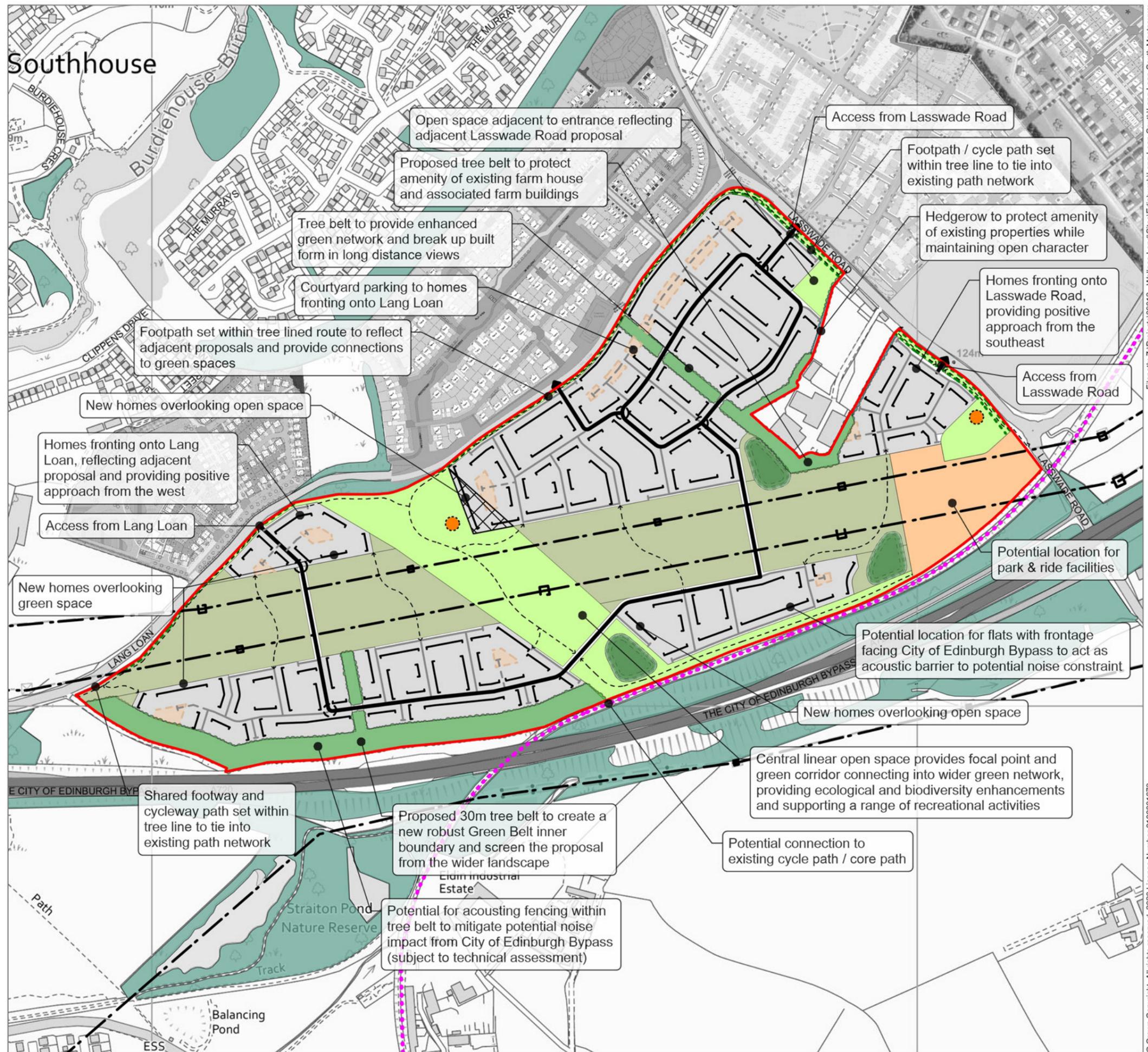
The findings of the Site Assessment Review concludes that the site South of Lang Loan (Site Ref: 11) is a sustainable development proposal. The assessments undertaken demonstrates that the site scores best when objectively assessed against other identified potential allocations sites within South East Edinburgh (Sector 2).

The site is immediately effective and would be constructed over a 7 year period as demonstrated by the supporting Site Effectiveness Statement. The delivery of the site as a whole will however be appropriately phased to ensure that delivery of other uses and infrastructure is aligned with the delivery of new homes.

The Preliminary Education Infrastructure Note confirms that the education capacity is not a barrier to the allocation of further new housing in the area as the impact of new pupils from the development can be mitigated through the expansion of existing primary school infrastructure and new infrastructure on land already available to the Council. The lack of education constraint in this area is highlighted by the Council's identification of land in this area as suitable for greenfield housing development.

Wallace is committed to the early delivery of affordable housing, infrastructure and community facilities, working in partnership with the Council, communities, infrastructure providers and registered social landlords as well as other stakeholders as required.

It is recommended that the Council amends the existing settlement boundary and continues to support the allocation of South of Lang Loan (Site Ref: 11) for new housing development in City Plan 2030.



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# Lang Loan South

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**Drawing No.**  
**09012-Lang Loan South-MPDF-P101**  
**Indicative Development Framework**

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	Site boundary
	Residential development - 19.40 ha around 780 homes at 40 dph
	Development within area of made ground - 0.24 ha
	Open space - 5.74 ha

*Note: SuDS measures excluded from open space calculation. Open space subject to confirmation of SuDS.*

	Proposed meadow planting
	Existing woodland
	Proposed tree belt
	Proposed hedgerow
	Proposed tree line
	Potential location for SuDS measure
	Potential location for equipped play area
	Primary street
	Lane
	Parking courtyard
	Primary node
	Frontage
	Proposed footpath
	Potential Future Core Path
	Potential location for park & ride facilities
	Existing electrical power lines

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Rev - (16.03.19) Drawn: KP Checked: KT Approved: KT

**Status: For Information**  
 scale 1:5,000 @ A3

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The Quadrant, 17 Bernard St., Edinburgh, EH6 6PW | Tel: 0131 5533639 | info@geddesconsulting.com



# South of Lang Loan

## Development Framework Report

Representation to Choices for City Plan 2030

March 2020



## Contents

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# 1. Introduction

This submission has been prepared in response to the publication of the City of Edinburgh Council (the Council) *Choices for City Plan 2030*.

The site, *South of Lang Loan*, is identified by the Council as a potential option for residential development. This Development Framework Report, along with the *Site Assessment Review*, sets out the justification for this site to be allocated as a proposed housing site in the *Choices for City Plan 2030*.

Wallace Land Investments (Wallace) controls 42.1 ha of land to the south of Edinburgh (see plan opposite), south of Lang Loan and west of Lasswade Road. This control is exercised through a legal agreement.

The site sits within the context of recent development at Gilmerton Station Road, Lasswade Road and Lang Loan. It represents a logical extension to the south of Edinburgh and is in a sustainable location.

This proposal at *South of Lang Loan* is an effective site, as demonstrated by the *Site Effectiveness Statement*.

The site at *South of Lang Loan* would be delivered within a seven year period from the adoption of the new *City Plan 2030*.

## Public Transport

The site is within a sustainable location with access to existing bus services along Lasswade Road. The proposal also offers the potential to deliver a future park and ride facility in the southeast edge of the city.

## Active Travel

The proposal has been designed to encourage active travel. Its path network will connect into the existing footpath network along Lasswade Road and the cycle path along the southern boundary of the site. The proposal can deliver the *Potential Future Core Path* identified on the site, extending and improving the active travel network.

## Community Infrastructure

The proposal is well located within walking distance of existing amenities to the north and proposed facilities to the northeast.

It is considered that the already planned and future education infrastructure within the area can accommodate the proposal. Should it be determined that additional pupil capacity is required as a result of the proposal, Wallace will make a financial contribution to the delivery of additional school infrastructure.

## Landscape Character and Green Belt

The site is located within a Landscape Character Area with limited scenic value. Substantial structure planting is proposed along the southern site boundary screening the proposal in views from the south.

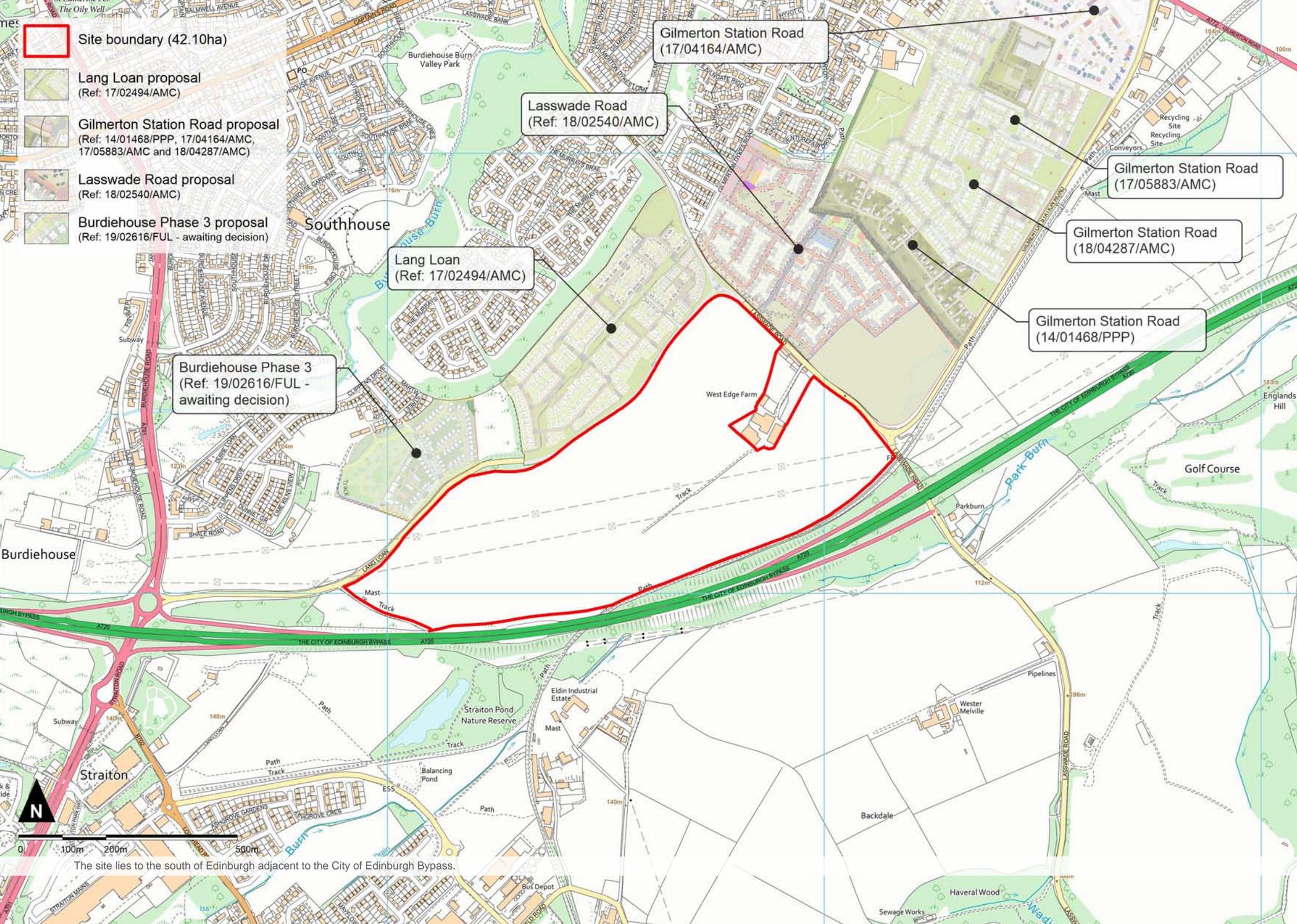
This structure planting will establish an appropriate long term boundary to the city in this location. The combination of the City of Edinburgh Bypass and this structure planting, will create a robust and highly defensible Green Belt boundary.

## Green Network

The proposal will extend and enhance the green network. Substantial structure planting along the southern boundary will provide a new green corridor for wildlife and substantial areas of green space are proposed within the site. These will provide a variety of habitats, greatly enhancing the biodiversity of the site.

## Proposal

The proposal for *South of Lang Loan* can accommodate around 780 all tenure homes at a density of 40 homes per net hectare. This accords with the densities currently being delivered in recent edge of City developments approved by the Council. Affordable housing will be delivered in accord with the requirements of the adopted LDP.



Site boundary (42.10ha)

Lang Loan proposal  
(Ref: 17/02494/AMC)

Gilmerton Station Road proposal  
(Ref: 14/01468/PPP, 17/04164/AMC,  
17/05883/AMC and 18/04287/AMC)

Lasswade Road proposal  
(Ref: 18/02540/AMC)

Burdiehouse Phase 3 proposal  
(Ref: 19/02616/FUL - awaiting decision)

Gilmerton Station Road  
(17/04164/AMC)

Lasswade Road  
(Ref: 18/02540/AMC)

Gilmerton Station Road  
(17/05883/AMC)

Gilmerton Station Road  
(18/04287/AMC)

Gilmerton Station Road  
(14/01468/PPP)

Lang Loan  
(Ref: 17/02494/AMC)

Burdiehouse Phase 3  
(Ref: 19/02616/FUL -  
awaiting decision)



The site lies to the south of Edinburgh adjacent to the City of Edinburgh Bypass.

## 2. Emerging LDP Context

### Choices for City Plan 2030

This submission has been prepared on behalf of Wallace Land Investments in response to the publication of the City of Edinburgh Council (the Council's) *Choices for City Plan 2030*.

The *Choices for City Plan 2030* is the first stage in the Council's consultation process for the emerging *City Plan 2030*. It is therefore the first opportunity for interested parties to contribute to the formulation of the Council's development strategy in the emerging *City Plan 2030*.

The *City Plan 2030* will replace the adopted Local Development Plan (LDP) (2016). The Council's latest *Development Plan Scheme* (January 2020) anticipates that the *City Plan 2030* will be adopted by February 2022.

Choices for *City Plan 2030* identifies 16 Choices, including Choice 12 – *Choices our new homes and infrastructure*. Choice 12 identifies three options for how and where new homes will be delivered within Edinburgh:

- Option 1 *Delivery by the Council and its partners within the Urban Area*
- Option 2 *Delivery through market housing by releasing Greenfield land*
- Option 3 *A Blended Approach*

The Council's preferred option, Option 1, proposes there will be no release of sites within the designated Green Belt for new homes. Options 2 and 3 propose the release of land from the Green Belt. In order to deliver the required amount of new homes, there is (as set out within the Housing Land Assessment which supports this representation) a requirement to allocate additional sites outwith the defined Urban Area.

The Council has published supporting document *Housing Study* (January 2020) in support of the *Choices for City Plan 2030*. Part 2b *Greenfield Site Assessment* of the *Housing Study* provides an assessment of all greenfield land deemed to have potential for residential development. These areas of greenfield land are split into 134 Assessment Sites, grouped into seven sectors. *South of Lang Loan* is located within Sector 2.

### South of Lang Loan (Site Ref:11)

The site *South of Lang Loan* is identified by the Council as a potential option for residential development. The Council's Greenfield Site Assessment for the site *South of Lang Loan* (Site Ref: 11) is presented in page 53 of the Council's Housing Study.

The Council's assessment for *South of Lang Loan* concludes that *...the site is considered suitable for development, despite the effect on the rural edge of the city as seen from the City of Edinburgh Bypass and the nearby Drum Estate.*

The Council's assessment also concludes that *...the rural edge is already greatly diminished by recent development visible over the ridge in this area and there is opportunity to establish a new edge at the City of Edinburgh Bypass.*

For the reasons set out within the Site Assessment Review, the Council's Greenfield Assessment Review has been reviewed and updated by Geddes.

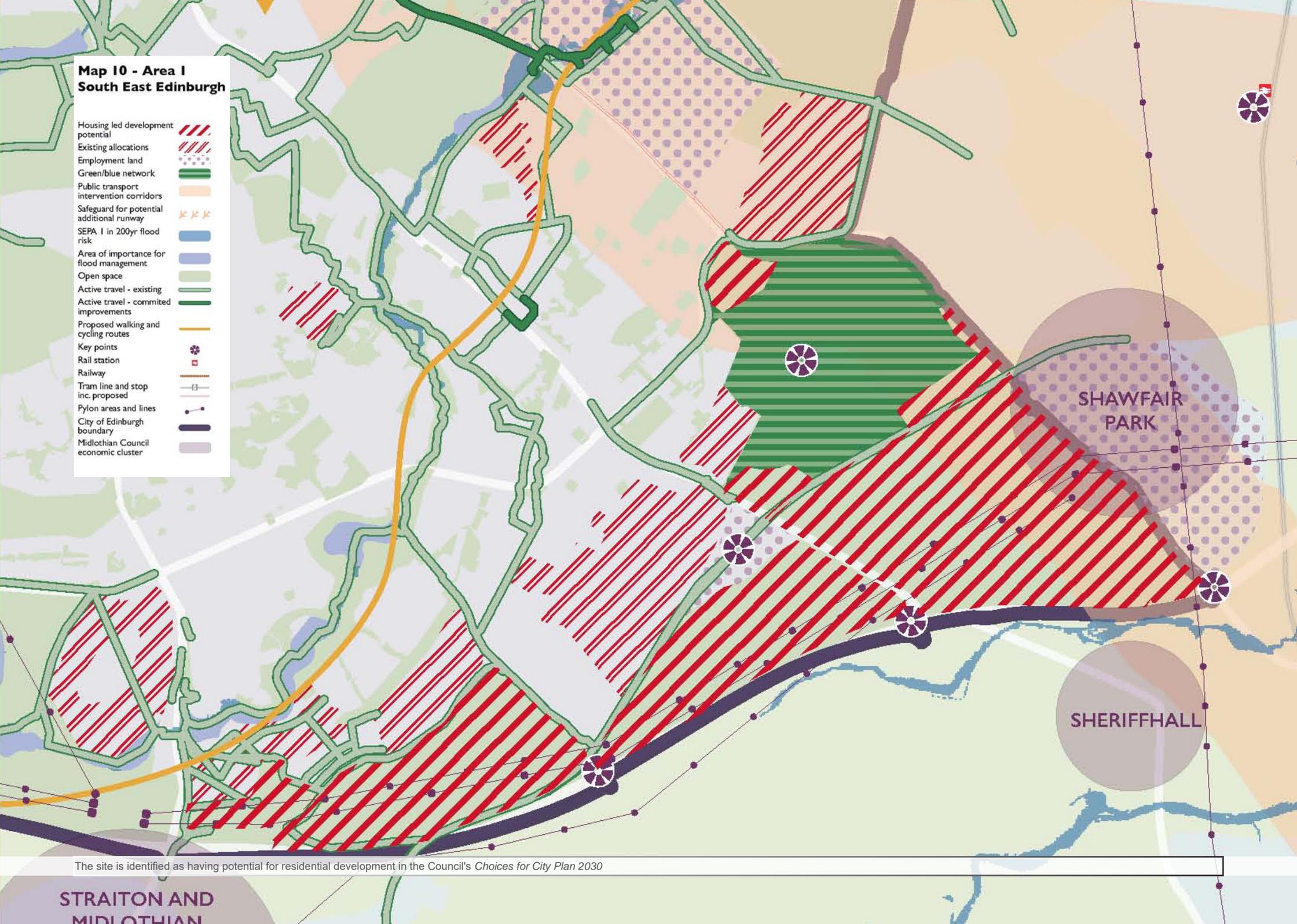
In addition to the Greenfield Site Assessment above, the Council has also undertaken a Site Assessment for the site *South of Lang Loan*. This assessment is contained within the Council's Environmental Report. The Council's Evaluation does not take account of proposed mitigation within the proposal, as detailed within this Development Framework Report.

This report along with the Site Assessment Review sets out the justification for this site *South of Lang Loan* (Site Ref: 11) to be allocated as a preferred housing site in the emerging City Plan 2030.

This proposal at *South of Lang Loan*, is an effective site, as demonstrated by the Site Effectiveness Statement. The site can deliver new homes within the five year period post adoption of the emerging City Plan 2030. As set out within the Housing Land Assessment, there is a requirement for the Council to allocate additional sites outwith the defined Urban Area.

# Map 10 - Area 1 South East Edinburgh

- Housing led development potential 
- Existing allocations 
- Employment land 
- Green/blue network 
- Public transport intervention corridors 
- Safeguard for potential additional runway 
- SEPA 1 in 200yr flood risk 
- Area of importance for flood management 
- Open space 
- Active travel - existing 
- Active travel - committed improvements 
- Proposed walking and cycling routes 
- Key points 
- Rail station 
- Railway 
- Tram line and stop inc. proposed 
- Pylon areas and lines 
- City of Edinburgh boundary 
- Midlothian Council economic cluster 



The site is identified as having potential for residential development in the Council's *Choices for City Plan 2030*

STRAITON AND  
MIDLOTHIAN

SHAWFAIR  
PARK

SHERIFFHALL

### 3. Transport and Infrastructure

#### Active Travel

The nearest Core Path to the site is CEC 1, located to the north of the site. This can be accessed via the existing footpath network along Lasswade Road.

An existing cycle path runs adjacent to the southern boundary of the site. This connects to the planned town centre and employment site in Shawfair, Midlothian to the east of the site. The Council identifies that there are plans in place to improve the existing cycle network, connecting the South East of Edinburgh to the wider cycle network via Old Dalkeith Road and the Bioquarter.

A *Potential Future* Core Path is identified on site. This connects Lang Loan to the cycle path to the south. The site will connect to the existing cycle path along the southern boundary. This supports active travel through the site and beyond.

#### Public Transport

The nearest bus stop is located adjacent to the site on Lasswade Road, approximately 500m from the centre of the site. Service 31 runs along Lasswade Road, providing regular buses to the city centre.

The *Choices for City Plan 2030* proposes to safeguard a site for park and ride facilities at various locations including one at Lasswade Road. This would further improve public transport access within the area.

#### Community Infrastructure

For non-denominational schooling, the site is located within the catchment of Gilmerton Primary School and Liberton High School. Both Gracemount Primary and Gracemount High School are closer to the site, just beyond the 1,600m maximum walking distance observed in PAN 75 annex B.

For denominational schooling, the site is located within the catchment of St Catherine's RC Primary School and Holy Rood High School.

A new primary school is due to be opened summer 2020 at Broomhills. This is located approximately 2,390m walking distance from the centre of the site.

As part of the adopted LDP, a new primary school was proposed at Gilmerton Station Road. This would be located 1,550m walking distance from the centre of the site. As set out in the *Development Management Subcommittee Report (18th March 2020)* the Council has identified that the need for this school *...may not arise...* as result of proposed development outlined within the adopted LDP. The site could therefore be used to accommodate pupils from future sites allocated for residential development within the emerging City Plan 2030.

An *Education Note* has been prepared in support of this representation, setting out school capacities and potential options for accommodating future development.

Two local shops are located within 1,600m of the centre of the site and Gracemount Local Centre is located just beyond at 1,660m. Additional services are proposed at Gilmerton Station Road, approximately 1,620m walking distance from the site.

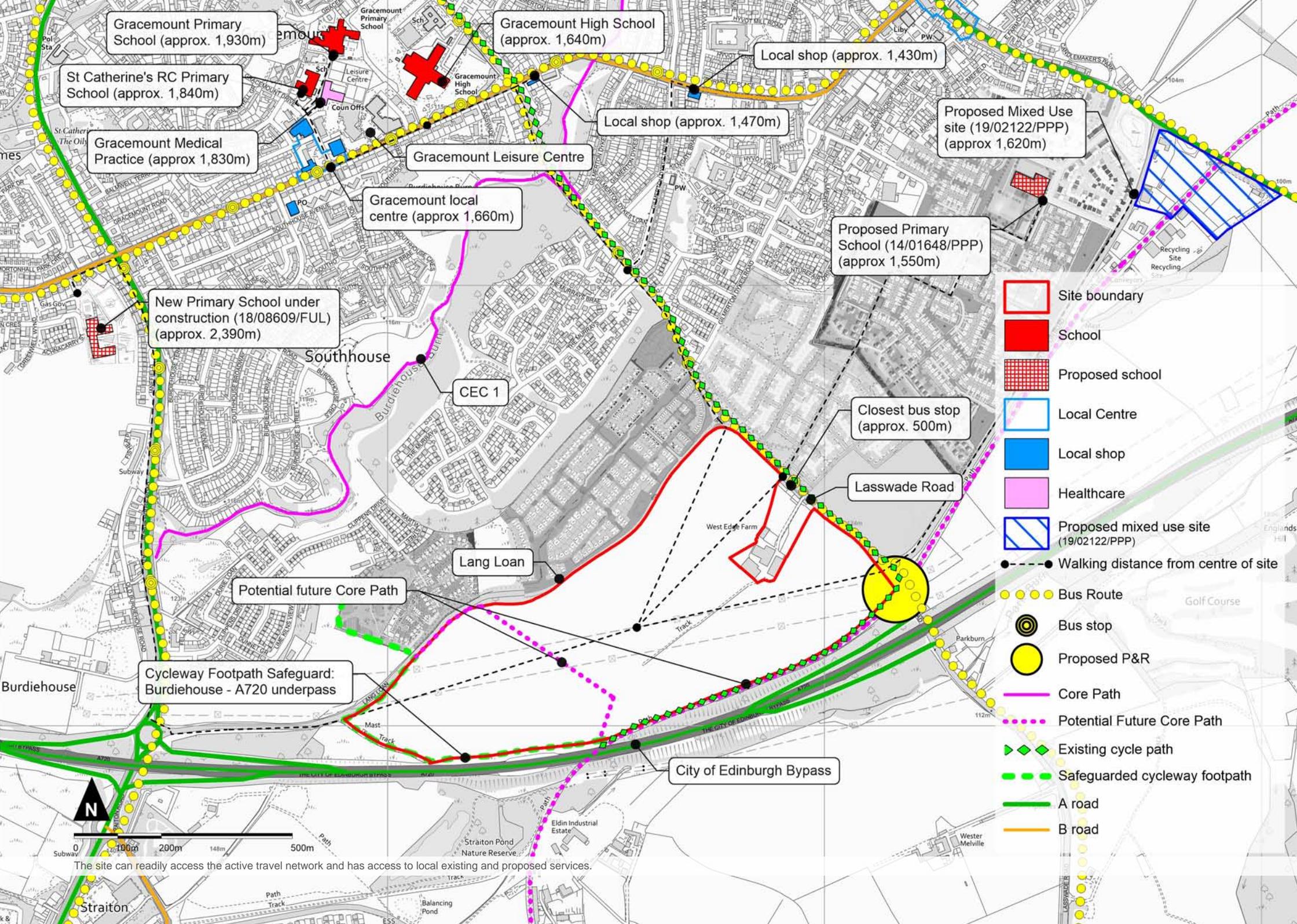
These existing and proposed amenities are within reasonable walking distance of the site. New housing on the site will promote active travel to these services, supporting local businesses and community infrastructure.

#### Population and Human Health

The City of Edinburgh Bypass runs adjacent to the southern site boundary. Where required, appropriate mitigation will be implemented along the southern boundary of the proposal to ensure no adverse impacts on air quality or noise levels arise.

The site can readily connect to the existing footpath and cycle network, including the *Potential Future* Core Path along the southern boundary. This allows the proposal to support active travel and the use of recreational walking and cycling routes.

The proposal will also support active travel and recreation through the incorporation of public open space. Open space on the site will provide opportunities for social interaction for both new and existing residents within the area.



Gracemount Primary School (approx. 1,930m)

St Catherine's RC Primary School (approx. 1,840m)

Gracemount Medical Practice (approx. 1,830m)

New Primary School under construction (18/08609/FUL) (approx. 2,390m)

Gracemount High School (approx. 1,640m)

Local shop (approx. 1,470m)

Gracemount Leisure Centre

Gracemount local centre (approx. 1,660m)

Local shop (approx. 1,430m)

Proposed Mixed Use site (19/02122/PPP) (approx. 1,620m)

Proposed Primary School (14/01648/PPP) (approx. 1,550m)

Southhouse

CEC 1

Closest bus stop (approx. 500m)

Lasswade Road

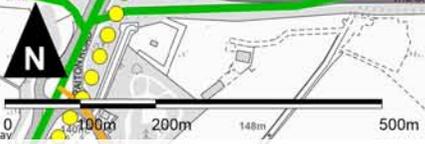
Lang Loan

Potential future Core Path

Cycleway Footpath Safeguard: Burdiehouse - A720 underpass

City of Edinburgh Bypass

- Site boundary
- School
- Proposed school
- Local Centre
- Local shop
- Healthcare
- Proposed mixed use site (19/02122/PPP)
- Walking distance from centre of site
- Bus Route
- Bus stop
- Proposed P&R
- Core Path
- Potential Future Core Path
- Existing cycle path
- Safeguarded cycleway footpath
- A road
- B road



The site can readily access the active travel network and has access to local existing and proposed services.

## 4. Site Context

### Green Belt

The key functions of the Edinburgh Green Belt are:

- *directing development to the most appropriate locations and supporting regeneration;*
- *protecting and enhancing the character, landscape setting and identity of the settlement; and*
- *protecting and providing access to open space.* (SPP, paragraph 49)

This Development Framework Report highlights that the proposal is in an appropriate location and that it supports regeneration.

The site sits immediately adjacent to the settlement edge next to recent and proposed development at Lang Loan and Lasswade Road. Development of the site represents a logical expansion of the settlement edge in this location.

The site is bounded by the City of Edinburgh Bypass (Bypass) to the south. This will form a clear and defensible Green Belt boundary for development of the site.

Existing woodland lines approximately two thirds of the southern site boundary adjacent to the Bypass. This strengthens the boundary marker that would be created by the Bypass and will be further reinforced with new structure planting within the proposal.

### Designations

There are no landscape designations on site.

*Braids, Liberton, Mortonhall* Special Landscape Area (SLA) is located to the west of the site beyond Burdiehouse Road. *The Drum* SLA is located to the north east beyond Gilmerton Road.

*Burdiehouse Burn Valley Park* is designated as a Local Nature Conservation Site and Local Nature Reserve. It is located to the north of the site beyond the existing neighbourhoods at the Murrays.

All of these designated sites are located a considerable distance from the site with existing built form located between them and the site. As such, there will be no impact upon these designations as a result of development on site.

A Local Nature Conservation Site is located adjacent to the south east of the site, located along the Loanhead Railway path. Existing vegetation along this edge will be protected during development of the site and an appropriate landscape treatment will be applied along the southern boundary to ensure there are no adverse impacts upon this Local Nature Conservation Site.

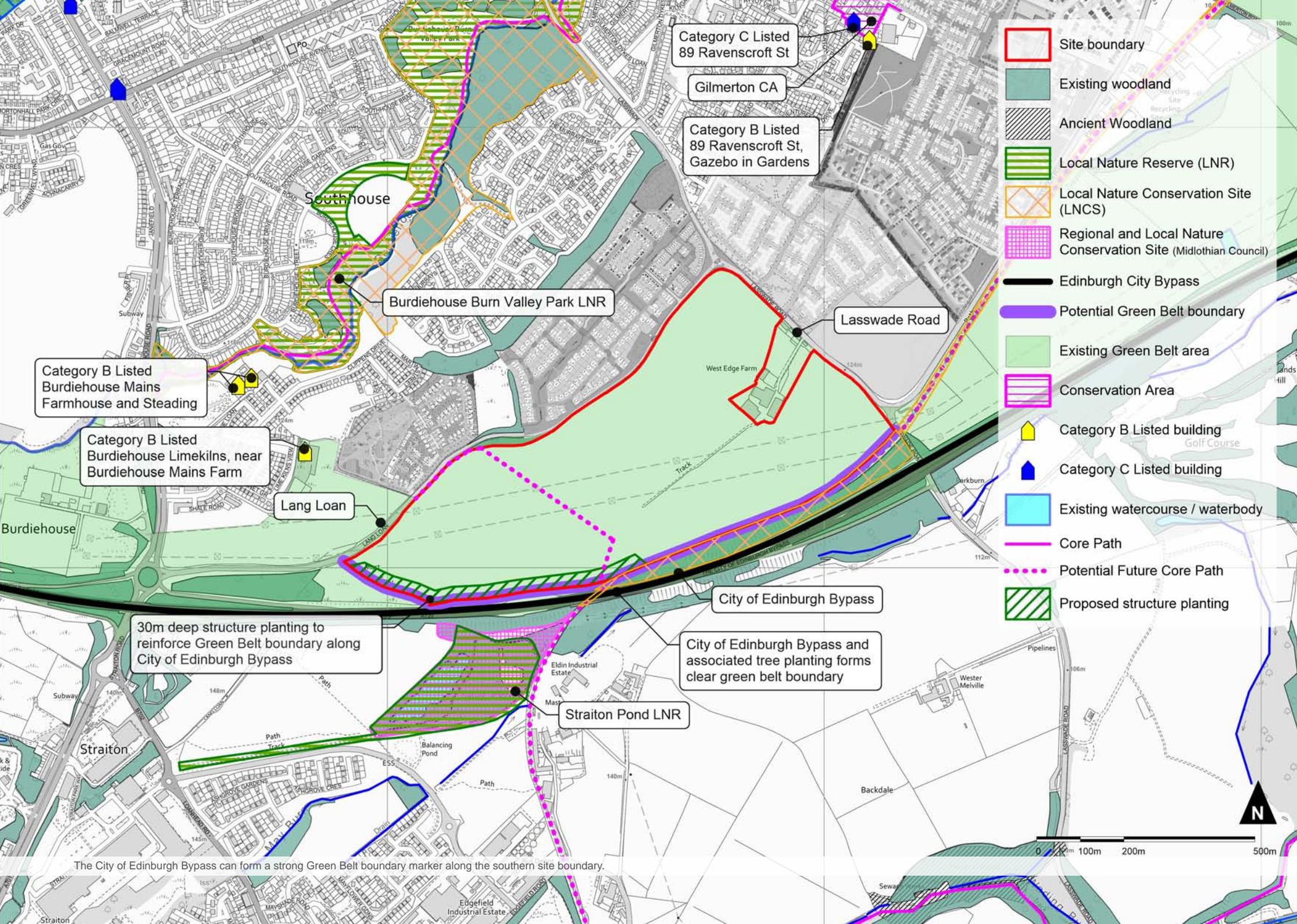
*Straiton Pond* Local Nature Reserve (LNR) is located to the south of the site on the southern edge of the Bypass. The Bypass effectively cuts the site off from this LNR. Therefore, no adverse impacts are anticipated as a result of development of the site.

There are no cultural heritage designations on site or within the immediate vicinity of the site.

*Gilmerton* Conservation Area and *The Drum* Historic Garden and Designed Landscape are located to the northeast of the site at Gilmerton Road.

There is no relationship between the site and these designations due to intervening built form and proposals at Gilmerton Station Road. Therefore development of the site will have no adverse impacts on these cultural heritage assets.

B Listed *Burdiehouse Limekilns* is located to the west of the site. This Listing comprises three kilns located within a small area of woodland. This woodland limits the setting of these kilns to their immediate context. Given the distance between the Listed buildings and the site, no adverse impact upon their setting is anticipated as a result of development of the site.



Category C Listed  
89 Ravenscroft St

Gilmerton CA

Category B Listed  
89 Ravenscroft St,  
Gazebo in Gardens

Southhouse

Burdiehouse Burn Valley Park LNR

Lasswade Road

Category B Listed  
Burdiehouse Mains  
Farmhouse and Steading

Category B Listed  
Burdiehouse Limekilns, near  
Burdiehouse Mains Farm

Lang Loan

30m deep structure planting to  
reinforce Green Belt boundary along  
City of Edinburgh Bypass

City of Edinburgh Bypass

City of Edinburgh Bypass and  
associated tree planting forms  
clear green belt boundary

Straiton Pond LNR

Straiton

The City of Edinburgh Bypass can form a strong Green Belt boundary marker along the southern site boundary.

-  Site boundary
-  Existing woodland
-  Ancient Woodland
-  Local Nature Reserve (LNR)
-  Local Nature Conservation Site (LNCS)
-  Regional and Local Nature Conservation Site (Midlothian Council)
-  Edinburgh City Bypass
-  Potential Green Belt boundary
-  Existing Green Belt area
-  Conservation Area
-  Category B Listed building
-  Category C Listed building
-  Existing watercourse / waterbody
-  Core Path
-  Potential Future Core Path
-  Proposed structure planting



## 5. Landscape Character

### Existing Landscape Character

The site is identified as being within the Burdiehouse farmland Landscape Character Area (LCA) of the Rolling farmland Landscape Character Type (LCT). This has been assessed within the *Edinburgh Landscape Character Assessment* by Land Use Consultants in association with Carol Anderson 2010.

This LCA is identified as being generally open in character. This is due to the elevated nature of the area, the long rolling slopes and the relative lack of woodland cover and hedgerows.

The site is visible from the City of Edinburgh Bypass (Bypass) as it passes the site. The Bypass itself and the large scale electricity pylons that pass through the site both degrade the character of the site, so its value is more associated with views from the Bypass.

The *Edinburgh City Plan 2030 Landscape and Visual Assessment of Greenfield Sites* raises concerns that development of the site would be intrusive on views from the Bypass. It suggests that these views could not be mitigated against with woodland planting due to the presence of the electricity transmission line and the elevated nature of the Bypass.

The transmission line is approximately 170m from the Bypass, and the Bypass is on an embankment that is approximately 7m high. A wide enough belt of structure planting that comprises large woodland species will therefore be able to form an effective visual screen once it starts to mature.

### Effect of Proposal on Landscape Character

The proposal introduces urban development on the site within an extensive green framework. The green corridor that traverses across the site from east to west is along the route of the existing electricity pylons. This will be managed to increase biodiversity and allow informal recreation and amenity.

A further green corridor runs in a more north to south direction, in the location of the former quarry. This open space will be managed both for biodiversity and as more formal public open space. These extensive green corridors together with additional structure planting throughout the proposal will break up the built form of the proposal, reducing the visual impact on distant views.

The main views into the site from the Bypass are proposed to be screened by a continuous, 30m depth of structure planting containing large woodland species. This will comprise a wide range of native species to provide habitat and enhance biodiversity. It will also include evergreen species to enhance the screening effect.

Although the tree belt will take a while to establish, it has the following long-term benefits:

- providing shelter to new homes;
- increasing the biodiversity of the site;
- linking neighbouring ecological habitats together;
- concealing potential noise mitigation measures required between the Bypass and the site; and
- reinforcing the proposed Green Belt boundary.

The following responses are therefore made to the questions raised within Table 5 of the methodology for assessing sites within the Council's Environmental Report:

*L1 Does the site have significant effects on the landscape setting of the city or townscape?*

Neutral. In the short term the proposal will increase the influence of built form on views from the Bypass. However, once the substantial structure planting starts to mature along the southern boundary of the site an appropriate, long-term boundary to the city will be established.

*L2 Does the site enable clear and defensible green belt boundaries to be formed?*

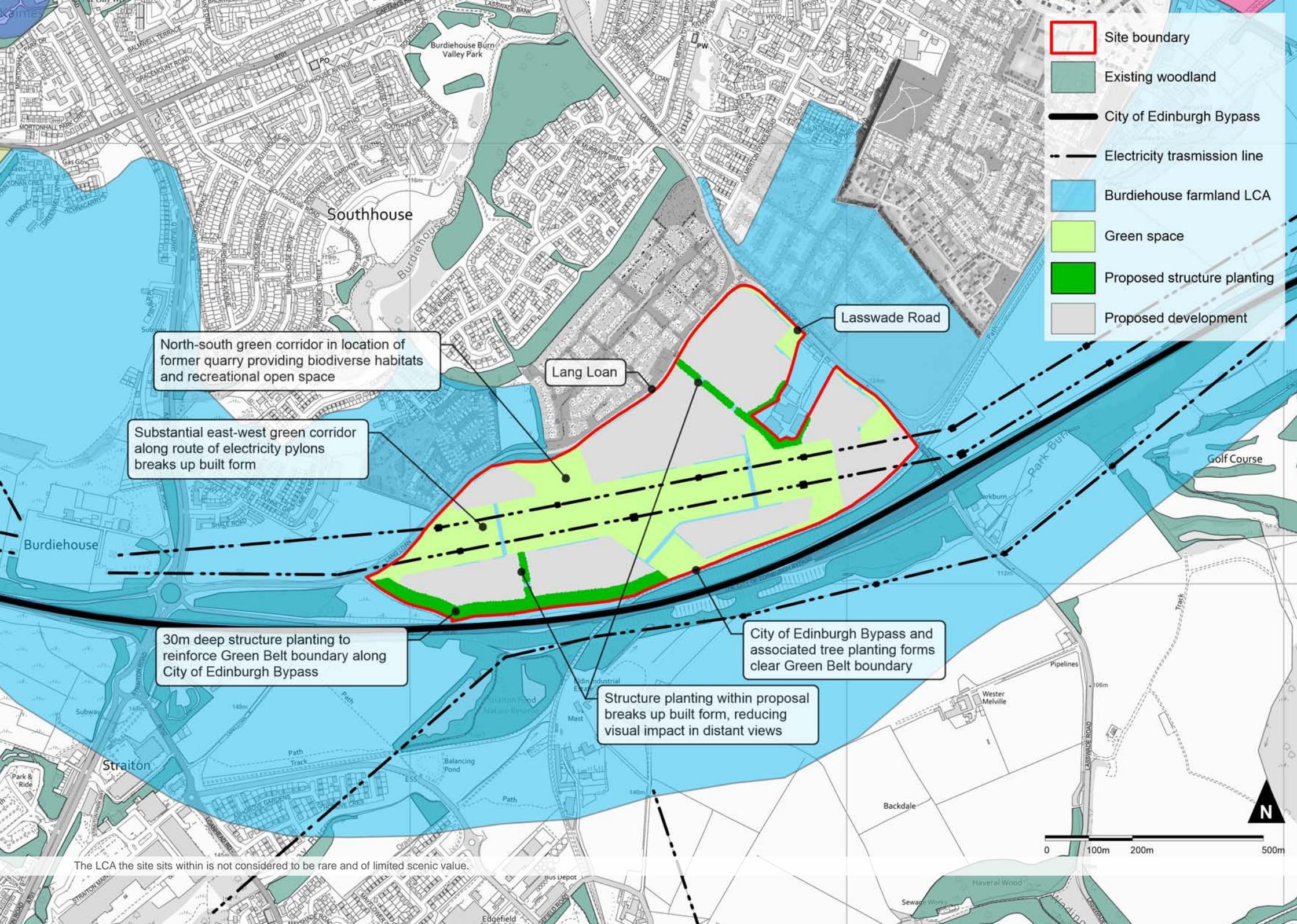
Yes. The combination of the Bypass and the proposed 30m depth of structure planting will create a highly defensible Green Belt boundary in accord with SPP.

*L3 Does the site have significant effects on the designated landscape areas?*

Neutral. There are no designated landscape areas within the vicinity of the site.

*L4 Does the site support the delivery of the green network?*

Yes. The site enables extensive green infrastructure including pedestrian routes and biodiversity corridors throughout the site. This will link and strengthen the wider green network in the south of Edinburgh.



- Site boundary
- Existing woodland
- City of Edinburgh Bypass
- Electricity trasmission line
- Burdiehouse farmland LCA
- Green space
- Proposed structure planting
- Proposed development

North-south green corridor in location of former quarry providing biodiverse habitats and recreational open space

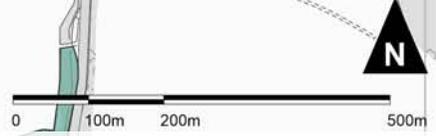
Substantial east-west green corridor along route of electricity pylons breaks up built form

30m deep structure planting to reinforce Green Belt boundary along City of Edinburgh Bypass

Structure planting within proposal breaks up built form, reducing visual impact in distant views

City of Edinburgh Bypass and associated tree planting forms clear Green Belt boundary

The LCA the site sits within is not considered to be rare and of limited scenic value.



## 6. Green Network

### Existing Green Network

The site is currently almost entirely under arable agricultural management. The arable nature of this landscape results in very limited habitat and biodiversity.

A semi-natural corridor of regenerating woodland and scrub forms a continuous biodiversity corridor around the southern edge of the site. The majority of this corridor is designated as a Local Nature Conservation Site (LNCS).

The western part of this biodiversity corridor becomes narrow beside the site where it is limited to the northern embankment of the City of Edinburgh Bypass (Bypass). This area is not designated as a LNCS and the development of the adjacent part of the site offers the opportunity to enhance the green network links around the site.

There is currently no pedestrian connectivity within the site, however there are pedestrian and cycle connections to the north, east and south of the site. This includes a cycle path and *Potential Future Core Path* that passes along the southern boundary of the site, connecting under the Bypass to Midlothian.

The development of the site provides the opportunity to enhance the pedestrian network in the southern part of Edinburgh. It includes the opportunity to deliver and enhance potential future paths identified in the *Edinburgh Core Paths Plan*.

### Effect of Proposal on the Green Network

The proposal introduces urban development on the site within an extensive green framework.

A biodiversity green corridor is proposed from east to west along the route of the electricity pylons. This route, with connecting green spaces, can be used for new strategic pedestrian links, public open spaces and for enhancing biodiversity.

A more formal green corridor is proposed in the location of the former quarry and runs from the northern to the southern boundaries of the site. This will also be managed to encourage biodiversity, but will be more focussed on recreation, amenity and pedestrian links.

The proposal also introduces a continuous, 30m depth of structure planting along the southern boundary of the site. This will comprise a wide range of native species to provide habitat and enhance biodiversity.

Although the structure planting will take a while to fully establish, it will have tangible and long-term benefits from the outset. This tree belt will increase the biodiversity within the site, and link neighbouring ecological habitats together along the northern edge of the Bypass.

The following responses are therefore made to the questions raised within Table 5 of the methodology for assessing sites within the Council's Environmental Report:

*B1 Would site protect and or enhance the integrity of a European and/or National designated biodiversity site?*

Neutral. There are no European or National designated biodiversity sites in the vicinity of the site.

*B2 Would the site protect and or enhance the integrity of local designated biodiversity sites and wildlife sites?*

Yes. The proposal will create robust biodiversity corridors across the site, linking to and enhancing the existing Local Nature Conservation Site on the southern boundary of the site.

*B3 Would the site protect and or enhance the integrity of existing habitat networks and other wildlife corridors?*

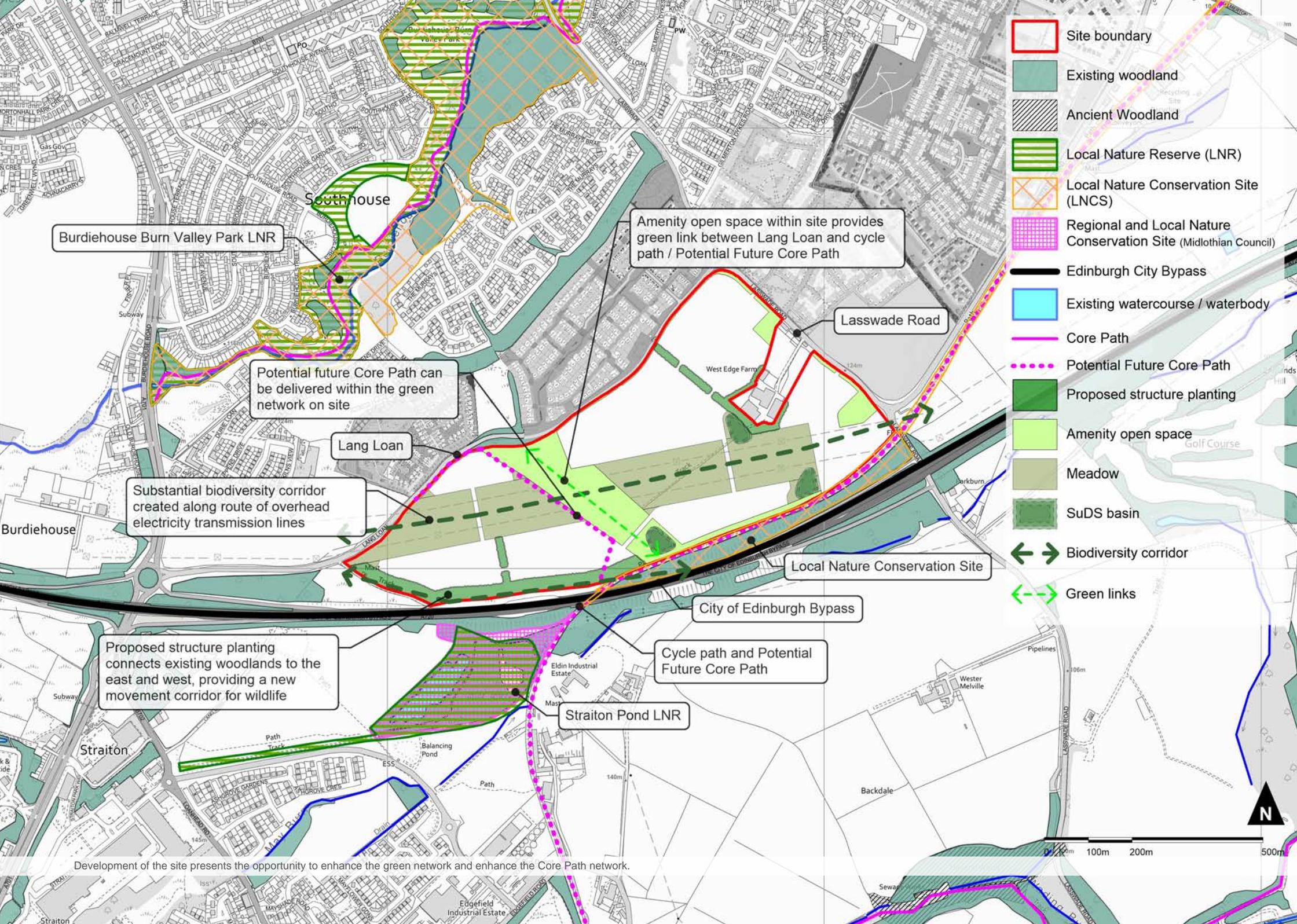
Yes. The proposal for the site would introduce large swathes of a variety of habitats, greatly enhancing the biodiversity of the site.

*B4 Would the site protect and or enhance protected species?*

Yes. The proposal for the site would provide improved habitat suitable for a range of protected species.

*B5 Would the site protect and or enhance ancient woodland?*

Neutral. There is no Ancient Woodland in the vicinity of the site.



-  Site boundary
-  Existing woodland
-  Ancient Woodland
-  Local Nature Reserve (LNR)
-  Local Nature Conservation Site (LNCS)
-  Regional and Local Nature Conservation Site (Midlothian Council)
-  Edinburgh City Bypass
-  Existing watercourse / waterbody
-  Core Path
-  Potential Future Core Path
-  Proposed structure planting
-  Amenity open space
-  Meadow
-  SuDS basin
-  Biodiversity corridor
-  Green links

Burdiehouse Burn Valley Park LNR

Amenity open space within site provides green link between Lang Loan and cycle path / Potential Future Core Path

Potential future Core Path can be delivered within the green network on site

Substantial biodiversity corridor created along route of overhead electricity transmission lines

Proposed structure planting connects existing woodlands to the east and west, providing a new movement corridor for wildlife

Cycle path and Potential Future Core Path

Development of the site presents the opportunity to enhance the green network and enhance the Core Path network.

## 7. Site Appraisal

The site is generally south facing, sloping downwards from Lang Loan to the City of Edinburgh Bypass (Bypass). The highest point is located in the western corner at around 146m AOD and the lowest point is located in the southeast corner at 114m AOD.

Ground modelling will ensure that appropriate road gradients and development platforms are achieved within the proposal.

There are no waterbodies or watercourses located within the site. A drainage strategy will be implemented to ensure that surface water run-off is attenuated and discharged at greenfield levels.

The *Land Capability for Agriculture* mapping by the James Hutton Institute indicates that the entire site is identified as Class 3.1. Class 3.1 is land capable of being used to produce a moderate range of crops and is classified as prime quality land.

Scottish Planning Policy (SPP) confirms that prime agricultural land can be released for development as part of the development strategy to meet housing need (SPP paragraph 80).

A former quarry is identified on the site resulting in an area of made ground. This will be incorporated within the open space framework of the proposal.

A small number of mineshafts and adits are located on the site. These are largely contained within the east of the site.

Further site investigations will be carried out and any mining constraints will be stabilised by grouting and capping, as required. All roads will be routed to avoid historical mine shafts.

Mitigation measures will also ensure that any ground contamination or gas issues, associated with historical mining are resolved.

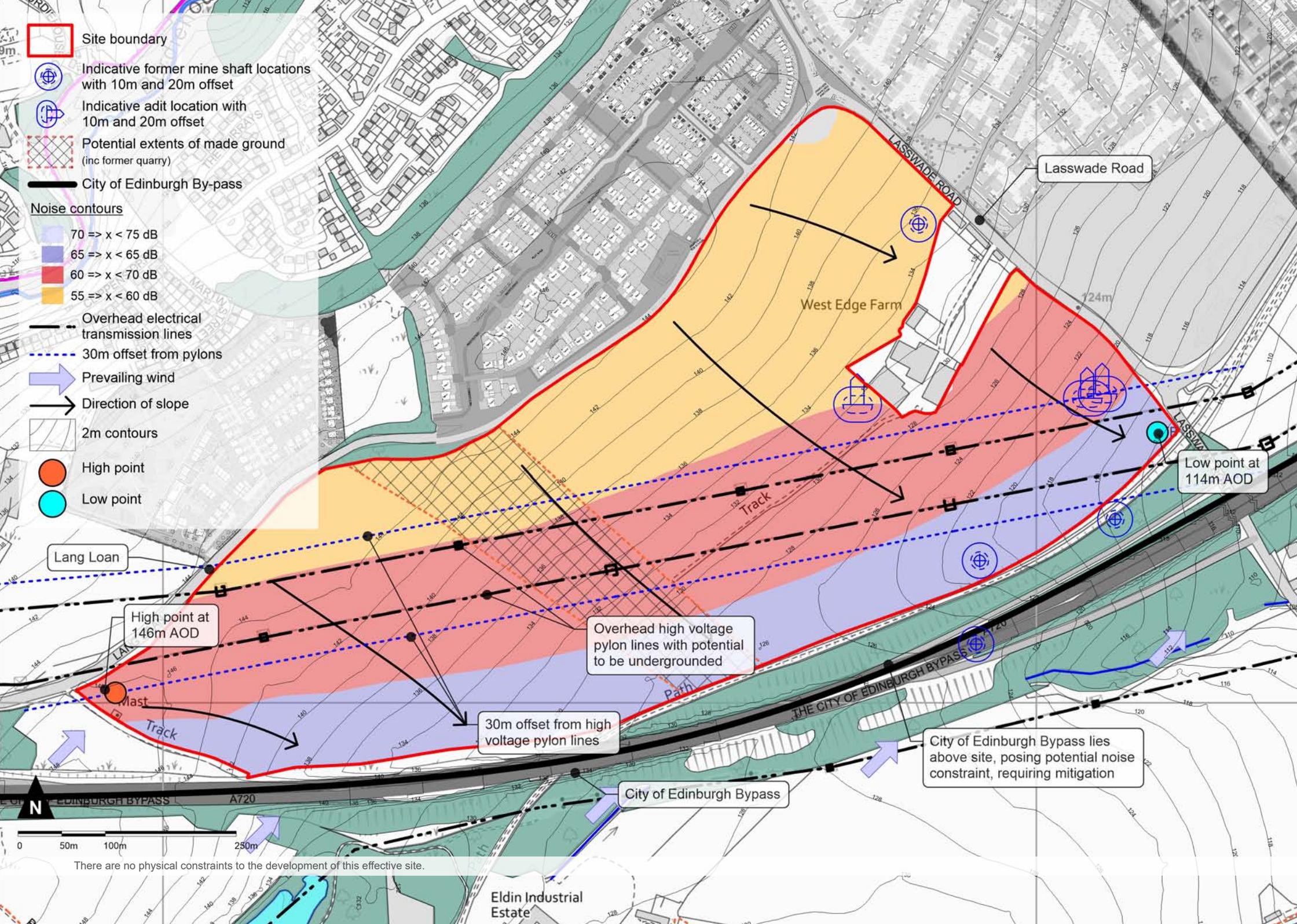
Following a detailed site investigation to locate mine shafts and other features, the detailed site layout will ensure that no development will be affected by the legacy of past mining.

Two overhead power lines cross the site. A stand-off to the pylons and overhead power lines will be implemented within the proposal. This will be considered in greater detail with the relevant statutory authority as the proposal progresses.

There are no existing trees within the site. Areas of woodland are located adjacent to the site boundary along the southern edge and along Lang Loan. Trees adjacent to the site will be protected in accord with BS 5837: 2012.

Additional trees will be planted on site, enhancing green network connections through the site and within the wider area.

The Bypass runs adjacent to the southern boundary. If required, appropriate mitigation will be provided in the south of the site to ensure there are no detrimental impacts on air quality and noise levels within the site. These mitigation measures will be confirmed through *Air Quality* and *Noise Impact* assessments.



- Site boundary
- Indicative former mine shaft locations with 10m and 20m offset
- Indicative adit location with 10m and 20m offset
- Potential extents of made ground (inc former quarry)
- City of Edinburgh By-pass

**Noise contours**

- 70 => x < 75 dB
- 65 => x < 65 dB
- 60 => x < 70 dB
- 55 => x < 60 dB

- Overhead electrical transmission lines
- 30m offset from pylons
- Prevailing wind
- Direction of slope

- 2m contours
- High point
- Low point

Lang Loan

High point at 146m AOD

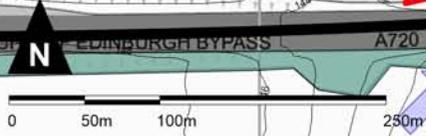
Overhead high voltage pylon lines with potential to be undergrounded

30m offset from high voltage pylon lines

City of Edinburgh Bypass

City of Edinburgh Bypass lies above site, posing potential noise constraint, requiring mitigation

Low point at 114m AOD



There are no physical constraints to the development of this effective site.

Eldin Industrial Estate

## 8. Proposal

The proposal is for around 780 homes including associated infrastructure, open space and SuDS. Affordable housing will be provided on site in accord with the Council's affordable housing policy.

In addition to new homes, an area has also been identified as the potential location for a park & ride, in accord with the Council's *Choices for City Plan 2030*.

Vehicular access is proposed at two locations from Lasswade Road and two locations from Lang Loan. This is an appropriate number of vehicular access points for the scale of development.

The primary street network connects the site from three of these access points, forming a loop within the site. This will form the main vehicular movement route within the site.

A small pocket of development is accessed from a single point of access from Lasswade Road, to the south of the site. This area has pedestrian connections to the rest of the proposal.

A series of lanes and courtyards are taken from the primary street, creating a permeable and legible layout and providing local access to new homes.

New homes will front onto Lasswade Road, reflecting the proposed development on the other side of the road. This provides a positive approach into the settlement from the southeast.

New homes will also front onto Lang Loan. This provides a welcoming entrance from the west and reflects recent development along the northern side of Lang Loan.

A shared footpath and cycle path is proposed along Lasswade Road. This will be set within a line of trees and will tie into the existing network, promoting active travel within and around the site.

New homes will also front onto the existing cycle path along the former rail line at the southern site boundary. This provides passive surveillance to this route, ensuring it is safe and pleasant, and further encouraging active travel. Homes will be set behind a strip of open space, ensuring the integrity of the existing LNCS to the south is retained.

A formal open space green corridor is proposed in the location of the former quarry and runs from the northern to the southern boundaries of the site. This will be managed to encourage biodiversity but will be primarily for recreation, amenity and pedestrian links to the wider green network. Equipped play areas will be incorporated within the open space.

A biodiversity green space corridor is proposed from east to west along the route of the overhead power lines. This route, with connecting green spaces, can be used for new strategic pedestrian links, public open spaces and for enhancing biodiversity.

A network of footpaths will be incorporated within the open space and will connect to the existing network. This promotes recreational and active travel within and around the site.

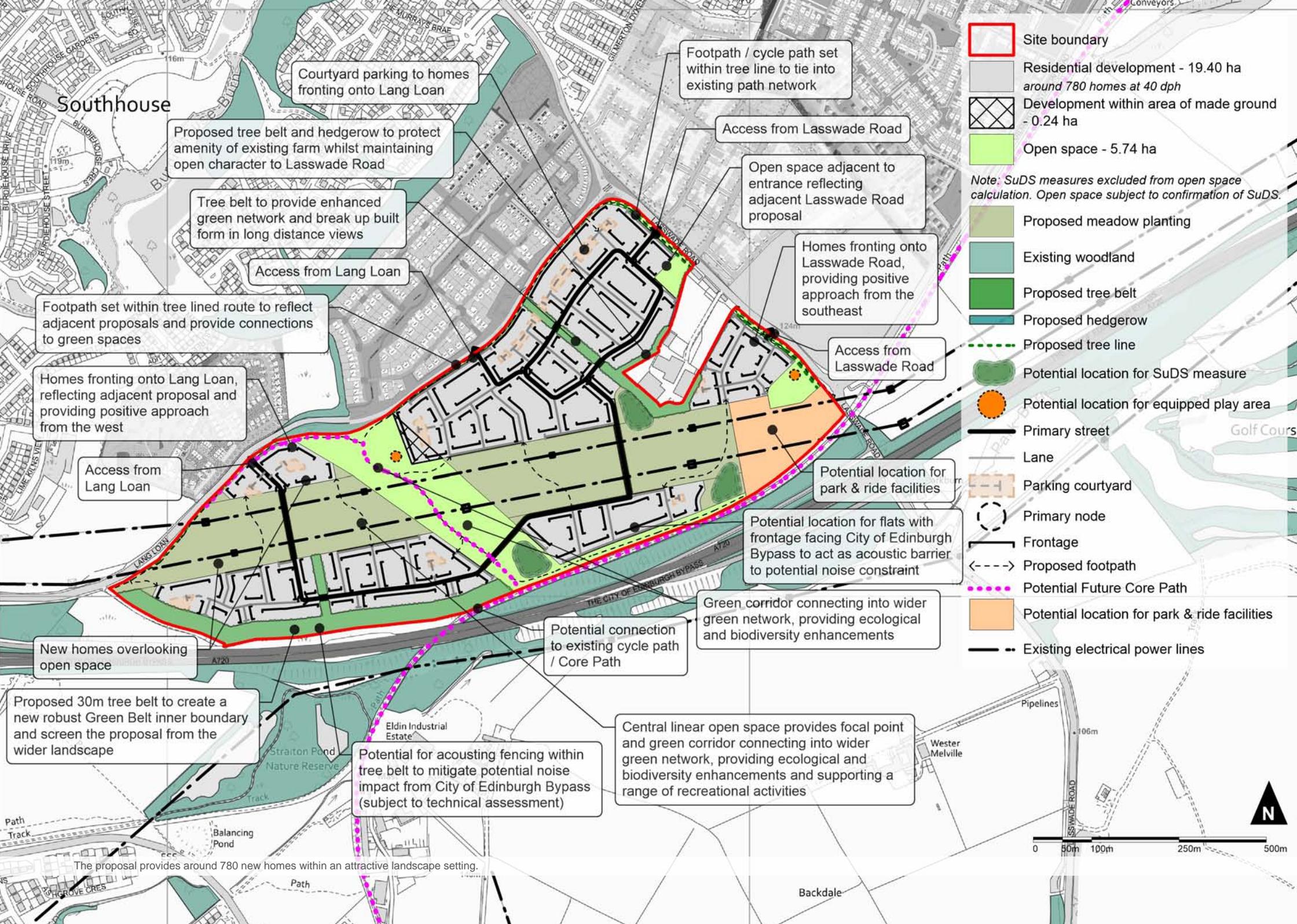
SuDS will be implemented within the proposal within the eastern area of open space. Surface water runoff will be attenuated to greenfield rates before being discharged to Park Burn to the south, ensuring there is no degradation of the existing water environment.

A tree belt will be planted along the south western boundary, tying into the existing trees to the southeast. This will screen the proposal in views from the south and reinforce the robust Green Belt inner boundary created along the City of Edinburgh Bypass.

If required, noise mitigation measures will be implemented along the southern site boundary. An acoustic fence could be positioned within the tree belt and flats could be located adjacent to the Core Path, providing mitigation and overlooking.

Additional tree belts are proposed within the site, providing additional green network connections and breaking up the built form in longer distance views.

The site could be built out at up to 120 completions per annum over a period of around 7 years. At this rate of annual house building, the development would support up to around 500 jobs (direct and indirect) per annum.



# Southhouse

- Site boundary
  - Residential development - 19.40 ha  
*around 780 homes at 40 dph*
  - Development within area of made ground - 0.24 ha
  - Open space - 5.74 ha
- Note: SuDS measures excluded from open space calculation. Open space subject to confirmation of SuDS.*
- Proposed meadow planting
  - Existing woodland
  - Proposed tree belt
  - Proposed hedgerow
  - Proposed tree line
  - Potential location for SuDS measure
  - Potential location for equipped play area
  - Primary street
  - Lane
  - Parking courtyard
  - Primary node
  - Frontage
  - Proposed footpath
  - Potential Future Core Path
  - Potential location for park & ride facilities
  - Existing electrical power lines

Courtyard parking to homes fronting onto Lang Loan

Proposed tree belt and hedgerow to protect amenity of existing farm whilst maintaining open character to Lasswade Road

Tree belt to provide enhanced green network and break up built form in long distance views

Access from Lang Loan

Footpath set within tree lined route to reflect adjacent proposals and provide connections to green spaces

Homes fronting onto Lang Loan, reflecting adjacent proposal and providing positive approach from the west

Access from Lang Loan

New homes overlooking open space

Proposed 30m tree belt to create a new robust Green Belt inner boundary and screen the proposal from the wider landscape

Potential for acousting fencing within tree belt to mitigate potential noise impact from City of Edinburgh Bypass (subject to technical assessment)

Central linear open space provides focal point and green corridor connecting into wider green network, providing ecological and biodiversity enhancements and supporting a range of recreational activities

Footpath / cycle path set within tree line to tie into existing path network

Access from Lasswade Road

Open space adjacent to entrance reflecting adjacent Lasswade Road proposal

Homes fronting onto Lasswade Road, providing positive approach from the southeast

Access from Lasswade Road

Potential location for park & ride facilities

Potential location for flats with frontage facing City of Edinburgh Bypass to act as acoustic barrier to potential noise constraint

Potential connection to existing cycle path / Core Path

Green corridor connecting into wider green network, providing ecological and biodiversity enhancements

The proposal provides around 780 new homes within an attractive landscape setting.



## 9. Recommendation to Council

This *Development Framework Report* demonstrates that this site is in a sustainable location and represents sustainable development in the terms set out by Scottish Ministers in SPP.

The proposal is in a sustainable location with access to bus services as well as proposed and existing local services and amenities. This includes a potential new park and ride facility.

The proposal will deliver around 780 homes along with a greenspace network comprising public open space and structure planting.

The site is immediately effective and would be constructed over a 7 year period as demonstrated by the *Site Effectiveness Statement*.

The allocation of this proposal will be in keeping with the character of the surrounding urban and local landscape context.

The *Site Assessment Review* provides an update to the Council's *Environmental Report* which confirms that there are no planning or environmental reasons why this site should not be allocated for housing development in the emerging *City Plan 2030*.

As identified in the *Education Note*, a number of options are available to provide the education capacity required for the proposal. Wallace is willing to make a proportionate financial contribution towards the cost of providing the necessary education as a result of the direct and cumulative impact of the development in accord with Circular 3/2012.

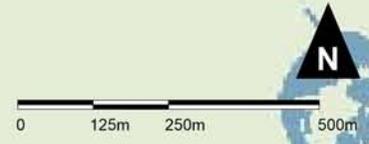
It is recommended that the Council amends the existing settlement boundary and allocates this site for new housing development in the proposed *City Plan 2030*.

The site is an effective housing site and these homes can be delivered within 7 years of the adoption of the emerging *City Plan 2030*.



-  Site boundary
-  Housing led development potential
-  Existing allocations
-  Employment land
-  Green/blue network
-  Public transport intervention corridors
-  Safeguard for potential additional runway
-  SEPA I in 200yr flood risk
-  Area of importance for flood management
-  Open space
-  Active travel - existing
-  Active travel - committed improvements
-  Proposed walking and cycling routes
-  Key points
-  Rail station
-  Railway
-  Tram line and stop inc. proposed
-  Pylon areas and lines
-  City of Edinburgh boundary
-  Midlothian Council economic cluster

# STRAITON AND MIDLOTHIAN GATEWAY



It is recommended that the Council allocates this site for new housing development in the proposed *City Plan 2030*.





The Quadrant  
17 Bernard Street  
Leith  
Edinburgh  
EH6 6PW

[t] 0131 553 3639

[e] [info@geddesconsulting.com](mailto:info@geddesconsulting.com)

[w] [www.geddesconsulting.com](http://www.geddesconsulting.com)

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Version 1	FINAL	Steven Brown & Rob Miller	Stuart Salter	28/04/2020

geddesconsulting



wallace  
land investments