

Customer Ref: 00631      Response Ref: ANON-KU2U-GWN3-6  
Name: Graham Lamb  
Response Type: Agent / Consultant  
On behalf of: Wallace Land Investments

Supporting Info: Yes  
Email: graham.lamb@pegasusgroup.co.uk

Choice 1 A

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

Short Response: Not Answered

Explanation: 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

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

Supporting Info

Email

Choice 1 C

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

Short Response

Explanation

Choice 1 D

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

Short Response

Explanation

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

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

Supporting Info

Email

Choice **1 F**

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

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

Customer Ref:  Response Ref:

Name

Response Type

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

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

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

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

Critique Of Council’s Transport Evidence Base (Section 3)

Paragraph 274 of the SPP does not distinguish between the different modes of transport that a Transport Appraisal should consider. The ESSTS fails to adequately consider existing capacity of rail infrastructure in Edinburgh, instead focussing on new tram or bus rapid transit interventions. The transport evidence base is therefore not sufficiently thorough to determine the most sustainable spatial and site development choices for Edinburgh. This could have affected the Council’s consideration of Corridor 8 – West of Hermiston as a sustainable transport corridor, which unlike other corridors does not require major intervention, as it already benefits from Curriehill train station on an electrified main line.

The ESSTS also erroneously states that Curriehill train station is an hourly service, when it is actually half hourly in peak hours. This error looks to have affected the consideration of South of Riccarton as a sustainable location for public transport, as the Housing Study scores South of Riccarton as “Red – No - The site does not support travel by public transport based on existing or incrementally improved provision”. This suggests that Curriehill Train Station has been omitted from the Council’s site assessment. This is despite the fact that South of Riccarton is the only greenfield site in west Edinburgh that is directly adjacent to an existing main line train station, which Wallace are proposing to enhance into a transport hub with Bus Rapid Transit interchange and a park and ride, which is all deliverable within the LDP timeframe.

The ESSTS recognises this opportunity for new transit solutions within Corridor 8, which includes South of Riccarton, as it is one of four corridors considered for further assessment (along with Corridors 3, 6 and 7); however the Choices for City Plan 2030 has only identified two corridors, 3- ‘South East Edinburgh via BioQuarter’ and 7- ‘Towards Newbridge and IBG’, for further assessment

Wallace Land Investments - South of Riccarton

Choices for City Plan 2030 – West Edinburgh – A Critique of the Evidence Base

Customer Ref: 00631 Response Ref: ANON-KU2U-GWN3-6

Supporting Info Yes

Name Graham Lamb

Email graham.lamb@pegasusgroup.co.uk

Response Type Agent / Consultant

On behalf of: Wallace Land Investments

without sufficient justification as to why these are preferred and why corridor 8 has been discounted.

Paragraph 274 of the Scottish Planning Policy (SPP) confirms that the site selection and the SEA process should be informed by a robust assessment of public transport provision. However, the Housing Study is not transparent in relation to how the site accessibility scores are generated. The assessment criteria are related to the outcomes of the Edinburgh Strategic Sustainable Transport Study (ESSTS) however this is based on wider transport corridors and not specific sites. As such, we can only assume there is another assessment available to the Council that does review the accessibility score of each site in the Housing Study but this has not been made publicly available for consultation.

Wallace's site South of Riccarton is located within Sustainable Transport Corridor 8 West of Hermiston in the ESSTS (Figure 9.1). However, map 3 within the Choices for City Plan is inaccurate as it does not align with Corridor 8 as depicted in the ESSTS, as it excludes the land parcel South of Riccarton and existing Curriehill train station. This critical error may well have influenced the accessibility judgements made towards South of Riccarton, which would further undermine the overall SEA process.

Finally, the outcome of the West Edinburgh's Spatial Strategy, commissioned by the Council, Scottish Government, Scottish Future's Trust and Scottish Enterprise, and being undertaken by Rettie, Aecom and Collective Architecture, is not yet known. In addition, the ESSTS is not yet complete, with the second stage assessment understood to still be progressed by Jacobs. It is therefore premature for the Choices for City Plan 2030 to include proposed site allocations in west Edinburgh (or at the very least without reasonable alternatives), given that the evidence base to justify the spatial strategy is incomplete.

The findings of these studies should form a key part of the Council's evidence base for selecting sites in west Edinburgh and therefore the current site choices are premature, particularly given the multiple flaws in the existing evidence base as highlighted above. Wallace therefore objects to all proposed sites in west Edinburgh at the present time.

The Housing Study omits important environmental criteria, including proximity to statutory environmental designations, and as such cannot be considered a robust assessment in line with SEA requirements. Furthermore, the criteria that are included do not properly assess site deliverability in terms of the existing capacity in local services, roads and public transport, or marketability.

Customer Ref: 00631 Response Ref: ANON-KU2U-GWN3-6

Supporting Info Yes

Name Graham Lamb

Email graham.lamb@pegasusgroup.co.uk

Response Type Agent / Consultant

On behalf of: Wallace Land Investments

As with the Environmental Report, some sites are assessed on the basis of their current position (without mitigation), whilst others are assessed on their future potential (with mitigation), which skews the results.

The two elements that seem to generate the most discrepancies in the scoring are education and public transport.

The Council's evidence base lacks an Education Impact Assessment, which should take into consideration existing capacity in the School Estate to inform an infrastructure first approach. Instead the Council favours the selection of sites such as Kirkliston to provide brand new school infrastructure. This may not be an issue in itself however, the evidence base is incomplete to determine if it is the most sustainable approach and the location for the new education facility seems to have been one of the key starting points and once that decision has been made it obviates an objective assessment of all other potential site options.

The Council's Assessment of South of Riccarton goes even further and states that it may have capacity to deliver a new school were it not for the East of Riccarton site taking up the capacity. Again, this demonstrates that each individual site has not been assessed objectively or independently, with a strong element of pre-determination when an Education Impact Assessment has not even been provided as part of the publicly available evidence base.

This is especially significant given that the Council's approach to calculating education need and contributions proposed within their 'Supplementary Guidance on Developer Contributions and Infrastructure Delivery' for the existing LDP was rejected by the Scottish Government on 29th January 2019.

In relation to public transport, site choices such as Kirkliston and Calderwood simply don't support the key Local Development Plan objective of reducing the reliance on the private car and Edinburgh Wallace Land Investments - South of Riccarton

Choices for City Plan 2030 – West Edinburgh – A Critique of the Evidence Base

Page | 6

ST/GL/P20-0337/R001v7

City Council's objective to be a carbon neutral City by 2030. Moreover, these sites do not sit within a sustainable transport corridor as identified by the ESSTS and should not be supported for development, whereas South of Riccarton does (Corridor 8) and should therefore be supported as a sustainable location for development.

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

Customer Ref:  Response Ref:   
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

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

Supporting Info

Email

Choice **7 C**

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

Short Response

Explanation

Choice **7 D**

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

Short Response

Explanation

Choice **8 A**

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

Short Response

Explanation

Customer Ref:  Response Ref:

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

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 9 A

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

Short Response

Explanation

Choice 9 B

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

Short Response

Explanation

Choice 10 A

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

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **10 B**

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

Short Response

Explanation

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

Customer Ref: 00631 Response Ref: ANON-KU2U-GWN3-6  
Name: Graham Lamb  
Response Type: Agent / Consultant  
On behalf of: Wallace Land Investments

Supporting Info: Yes  
Email: graham.lamb@pegasusgroup.co.uk

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: Not Answered

Explanation:

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:

00631

Response Ref:

ANON-KU2U-GWN3-6

Supporting Info

Yes

Name

Graham Lamb

Email

graham.lamb@pegasusgroup.co.uk

Response Type

Agent / Consultant

On behalf of:

Wallace Land Investments

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

Not Answered

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

Not Answered

Explanation

Choice

12 B4

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

Short Response

Not Answered

Explanation

Customer Ref:  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: 00631      Response Ref: ANON-KU2U-GWN3-6  
Name: Graham Lamb  
Response Type: Agent / Consultant  
On behalf of: Wallace Land Investments

Supporting Info: Yes  
Email: graham.lamb@pegasusgroup.co.uk

Choice      12   BX

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

Short Response: Not Answered

**Explanation**  
Wallace Land Investments object in principle to the proposed greenfield areas in west Edinburgh on the basis that the Council have not completed their evidence base on all key relevant matters, and therefore all current site choices in west Edinburgh are premature.  
SEE SUPPORTING DOCS for full critique eg CRITIQUE OF THE LANDSCAPE AND VISUAL IMPACT ASSESSMENT CRITIQUE OF TRANSPORT EVIDENCE BASE  
..... 20  
CRITIQUE OF THE LANDSCAPE AND VISUAL IMPACT ASSESSMENT ..... 27  
CRITIQUE OF THE ENVIRONMENTAL REPORT ..... 30  
CRITIQUE OF THE HOUSING STUDY ..... 38  
CONCLUSIONS ..... 50

Choice      12   C

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

Short Response: Yes

**Explanation**

Customer Ref:

00631

Response Ref:

ANON-KU2U-GWN3-6

Supporting Info

Yes

Name

Graham Lamb

Email

graham.lamb@pegasusgroup.co.uk

Response Type

Agent / Consultant

On behalf of:

Wallace Land Investments

Choice 12 C

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

Short Response

No

Explanation

Choice 12 C

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

Short Response

No

Explanation

Choice 12 D

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

Short Response

No

Explanation

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

Supporting Info

Email

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

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

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 14 C

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

Short Response

Explanation

Choice 15 A

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

Short Response

Explanation

Choice 15 B

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

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 15 C

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

Short Response

Explanation

Choice 15 D

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

Short Response

Explanation

Choice 15 E

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

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 15 G

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

Short Response

Explanation

Choice 16 A1

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

Short Response

Explanation

Choice 16 A2

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

Short Response

Explanation

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

Supporting Info

Email

Choice **16 A3**

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

Short Response

Explanation

Choice **16 A4**

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

Short Response

Explanation

Choice **16 A5**

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

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **16 A5**

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

Short Response

Explanation

Choice **16 B**

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

Short Response

Explanation

Choice **16 C**

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

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 16 E1

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

Short Response

Explanation

Choice 16 E2

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

Short Response

Explanation

Choice 16 E3

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

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 16 E4

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

Short Response

Explanation

Choice 16 E5

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

Short Response

Explanation

Choice 16 E6

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

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 E7

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

Short Response

Explanation

Choice 16 E8

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

Short Response

Explanation

Choice 16 EX

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

Short Response

Explanation

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

Supporting Info

Email

Choice 16 F

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

Short Response

Explanation

Choice 16 G

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

Short Response

Explanation

Choice 16 H

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

Short Response

Explanation

**Customer Ref:**       **Response Ref:**

**Name**

**Response Type**

**On behalf of:**

**Supporting Info**

**Email**

---

## Response ID ANON-KU2U-GWN3-6

Submitted to **Choices for City Plan 2030**

Submitted on **2020-04-30 15:14:02**

### Your information and data

#### 1 What is your name?

**Name:**

Graham Lamb

#### 2 What is your email address?

**Email:**

graham.lamb@pegasusgroup.co.uk

#### 3. If you do not have an email address What is your address?

**Full address including postcode:**

#### 4 I am responding as

Agent / Consultant

#### 5 IF you are responding on behalf of an organisation or an other individual, what is their name?

**Agent on behalf of:**

Wallace Land Investments

#### 6 I agree to my response being published to this consultation.

Yes

### Choice 12 - Building our new homes and infrastructure

#### 12A Which option do you support?

Not Answered

**Explain why you support that option, or why haven't chosen an option:**

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

**Support Greenfield - Support:**

**Support Greenfield - Object:**

Calderwood, Kirkliston, West Edinburgh, East of Riccarton

**Explain why:**

Wallace Land Investments object in principle to the proposed greenfield areas in west Edinburgh on the basis that the Council have not completed their evidence base on all key relevant matters, and therefore all current site choices in west Edinburgh are premature.

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

**Greenfield file upload:**

R001v7\_Reps to Edinburgh Choices Plan FINAL- w Appendices.pdf was uploaded

**Greenfield file upload:**

No file was uploaded

**Greenfield file upload:**

No file was uploaded

#### 12D Do you have a brownfield site you wish us to consider in the proposed Plan?

**Brownfield sites upload:**

No file was uploaded

### Choice 14 - Delivering West Edinburgh

**14A 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?**

Not Answered

**Explain why:**

**14B 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?**

Not Answered

**Explain why:**

**14C 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?**

Not Answered

**Explain why:**



**CHOICES FOR CITY PLAN 2030 – WEST  
EDINBURGH - A CRITIQUE OF THE EVIDENCE BASE**

**ON BEHALF OF WALLACE LAND INVESTMENTS  
REPRESENTING SITE 'SOUTH OF RICCARTON'**

Date: 30<sup>th</sup> April 2020

Pegasus Reference: ST/GL/P20-0337/R001v7

**Pegasus Group**

Queens House | Queen Street | Manchester | M2 5HT

**T** 0161 393 3399 | **W** [www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough

**DESIGN** | **ENVIRONMENT** | **PLANNING** | **ECONOMICS** | **HERITAGE**

© Copyright Pegasus Planning Group Limited. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited.

## CONTENTS

EXECUTIVE SUMMARY .....	2
1. INTRODUCTION.....	8
2. STRATEGIC ENVIRONMENTAL ASSESSMENT PROCESS & OBLIGATIONS .....	10
3. CRITIQUE OF TRANSPORT EVIDENCE BASE .....	20
4. CRITIQUE OF THE LANDSCAPE AND VISUAL IMPACT ASSESSMENT.....	27
5. CRITIQUE OF THE ENVIRONMENTAL REPORT .....	30
6. CRITIQUE OF THE HOUSING STUDY.....	38
7. CONCLUSIONS .....	50
APPENDIX 1 – COMPARATIVE PROFORMA ASSESSMENT QUESTIONS .....	53
APPENDIX 2 – LANDSCAPE ASSESSMENTS OF WEST EDINBURGH GREENFIELD SITES .....	54
APPENDIX 3 – PEGASUS ENVIRONMENTAL ASSESSMENT SITE PROFORMA .....	55
APPENDIX 4 – GOVERNMENT REPORT – EDUCATION DEVELOPER CONTRIBUTIONS.....	56
APPENDIX 5 – HERIOT-WATT EMPLOYEE INFORMATION.....	57
APPENDIX 6 – PEGASUS HOUSING ASSESSMENT SITE PROFORMA.....	58

---

## **EXECUTIVE SUMMARY**

These representations have been prepared on behalf of Wallace Land Investments (Wallace) in relation to the Edinburgh Choices for City Plan 2030 and associated evidence, focussing on how sites in west Edinburgh have been considered and assessed, particularly the site represented by Wallace 'South of Riccarton', which is a sustainably located site capable of accommodating a mix of up to 3,600 new homes, new schools, a local centre, and a transport hub directly next to Curriehill train station and Heriot-Watt University/employment cluster.

These representations consider and assess the Council's evidence base documents supporting the Choices for City Plan with a specific focus on west Edinburgh and should be read in conjunction with the further representations submitted on South of Riccarton by Geddes Consulting on behalf of Wallace.

### **Strategic Environmental Assessment Process & Obligations (Section 2)**

The Council's Environmental Assessment paper fails to comply with Article 5(1) of the SEA and associated Scottish Law Directive because all reasonable alternative greenfield sites are not assessed. Without such an assessment it cannot be shown that the sites chosen are the most suitable.

All greenfield sites were appraised under the Council's Housing Study background paper however this omits several critical environmental considerations including ecological designations and habitats. The Housing Study also gives favourable treatment to preferred sites through the application of site-specific mitigation (e.g. convenience service provision, education facilities and public transport interventions), but not to other reasonable alternatives, further undermining the outcomes of the Environmental Report.

Therefore, alternative greenfield sites have not been assessed by a compliant SEA as this is reliant on the findings of this incomplete and biased Housing Study.

Paragraph 274 of the Scottish Planning Policy (SPP) confirms that the site selection and the SEA process should be informed by a robust assessment of public transport provision. However, the Housing Study is not transparent in relation to how the site accessibility scores are generated. The assessment criteria are related to the outcomes of the Edinburgh Strategic Sustainable Transport Study (ESSTS) however this is based on wider transport corridors and not specific sites. As such, we can only assume there is another assessment available to the Council that does review the accessibility score of each site in the Housing Study but this has not been made publicly available for consultation.

Wallace's site South of Riccarton is located within Sustainable Transport Corridor 8 West of Hermiston in the ESSTS (Figure 9.1). However, map 3 within the Choices for City Plan is inaccurate as it does not align with Corridor 8 as depicted in the ESSTS, as it excludes the land parcel South

of Riccarton and existing Curriehill train station. This critical error may well have influenced the accessibility judgements made towards South of Riccarton, which would further undermine the overall SEA process.

Finally, the outcome of the West Edinburgh's Spatial Strategy, commissioned by the Council, Scottish Government, Scottish Future's Trust and Scottish Enterprise, and being undertaken by Rettie, Aecom and Collective Architecture, is not yet known. In addition, the ESSTS is not yet complete, with the second stage assessment understood to still be progressed by Jacobs. It is therefore premature for the Choices for City Plan 2030 to include proposed site allocations in west Edinburgh (or at the very least without reasonable alternatives), given that the evidence base to justify the spatial strategy is incomplete.

The findings of these studies should form a key part of the Council's evidence base for selecting sites in west Edinburgh and therefore the current site choices are premature, particularly given the multiple flaws in the existing evidence base as highlighted above. Wallace therefore objects to all proposed sites in west Edinburgh at the present time.

### **Critique Of Council's Transport Evidence Base (Section 3)**

Paragraph 274 of the SPP does not distinguish between the different modes of transport that a Transport Appraisal should consider. The ESSTS fails to adequately consider existing capacity of rail infrastructure in Edinburgh, instead focussing on new tram or bus rapid transit interventions. The transport evidence base is therefore not sufficiently thorough to determine the most sustainable spatial and site development choices for Edinburgh. This could have affected the Council's consideration of Corridor 8 – West of Hermiston as a sustainable transport corridor, which unlike other corridors does not require major intervention, as it already benefits from Curriehill train station on an electrified main line.

The ESSTS also erroneously states that Curriehill train station is an hourly service, when it is actually half hourly in peak hours. This error looks to have affected the consideration of South of Riccarton as a sustainable location for public transport, as the Housing Study scores South of Riccarton as "*Red – No - The site does not support travel by public transport based on existing or incrementally improved provision*". This suggests that Curriehill Train Station has been omitted from the Council's site assessment. This is despite the fact that South of Riccarton is the only greenfield site in west Edinburgh that is directly adjacent to an existing main line train station, which Wallace are proposing to enhance into a transport hub with Bus Rapid Transit interchange and a park and ride, which is all deliverable within the LDP timeframe.

The ESSTS recognises this opportunity for new transit solutions within Corridor 8, which includes South of Riccarton, as it is one of four corridors considered for further assessment (along with Corridors 3, 6 and 7); however the Choices for City Plan 2030 has only identified two corridors, 3- 'South East Edinburgh via BioQuarter' and 7- 'Towards Newbridge and IBG', for further assessment

without sufficient justification as to why these are preferred and why corridor 8 has been discounted.

#### **Critique Of The Landscape And Visual Impact Assessment (Section 4)**

The land parcels contained within the Council's Landscape and Visual Assessment of greenfield sites does not match with the Greenfield Parcel Assessment in Part 2b of the Housing Study making comparative analysis extremely difficult and begs the question whether this could support a robust site selection process and consideration of reasonable alternatives.

Given the lack of clarity in the findings we provide our own composite table (Figure 4.1) and compare all the parcel assessments covering the four greenfield sites proposed for release in west Edinburgh. We also provide the assessment of South of Riccarton being promoted by Wallace.

This demonstrates that the landscape conclusions have not been consistently applied when it comes to site selection, with the proposed allocations at Kirkliston and Calderwood considered to have 'no scope for development' in landscape terms, whilst South of Riccarton is considered to have 'scope for development' and should therefore merit a proposed allocation.

#### **Critique Of The Environmental Report (Section 5)**

The Council's Environmental Report only considers those 5 Greenfield sites considered by the Council to be suitable for release within the Housing Study, and therefore fails to meet the SEA requirement to test reasonable alternatives.

The land parcels assessed in the Environmental Report do not match the Housing Study, which is cross referred to when making site assessments and neither parcels match the preferred site choices. This makes comparative analysis across the evidence base difficult, and provides a further indication that the site selection process is not robust.

The Environmental Report assesses sites inconsistently. As such, we have carried out our own Environmental Assessment of the chosen sites in west Edinburgh and compared this against South of Riccarton (**Appendix 3**). The conclusion of this assessment scores the sites as following:

- South of Riccarton= **29**
- Crosswinds= **28**
- East of Riccarton= **27**
- West Edinburgh= **18**
- Kirkliston= **15.75**
- Calderwood= **12**

Therefore, Wallace objects that South of Riccarton has not been chosen as a suitable site in west Edinburgh and strongly objects on environmental grounds to the site choices of West Edinburgh, Kirkliston and Calderwood as they are unsuitable.

### **Critique of the Housing Study (Section 6)**

The Council has not undertaken a call for sites leading to a lack of clarity on how housing sites have been identified. Site boundaries and categorisations do not correlate with other evidence base documents. This is unacceptable given the importance of this document in informing site selection.

The Housing Study omits important environmental criteria, including proximity to statutory environmental designations, and as such cannot be considered a robust assessment in line with SEA requirements. Furthermore, the criteria that are included do not properly assess site deliverability in terms of the existing capacity in local services, roads and public transport, or marketability.

As with the Environmental Report, some sites are assessed on the basis of their current position (without mitigation), whilst others are assessed on their future potential (with mitigation), which skews the results.

The two elements that seem to generate the most discrepancies in the scoring are education and public transport.

The Council's evidence base lacks an Education Impact Assessment, which should take into consideration existing capacity in the School Estate to inform an infrastructure first approach. Instead the Council favours the selection of sites such as Kirkliston to provide brand new school infrastructure. This may not be an issue in itself however, the evidence base is incomplete to determine if it is the most sustainable approach and the location for the new education facility seems to have been one of the key starting points and once that decision has been made it obviates an objective assessment of all other potential site options.

The Council's Assessment of South of Riccarton goes even further and states that it may have capacity to deliver a new school were it not for the East of Riccarton site taking up the capacity. Again, this demonstrates that each individual site has not been assessed objectively or independently, with a strong element of pre-determination when an Education Impact Assessment has not even been provided as part of the publicly available evidence base.

This is especially significant given that the Council's approach to calculating education need and contributions proposed within their 'Supplementary Guidance on Developer Contributions and Infrastructure Delivery' for the existing LDP was rejected by the Scottish Government on 29th January 2019.

In relation to public transport, site choices such as Kirkliston and Calderwood simply don't support the key Local Development Plan objective of reducing the reliance on the private car and Edinburgh

City Council's objective to be a carbon neutral City by 2030. Moreover, these sites do not sit within a sustainable transport corridor as identified by the ESSTS and should not be supported for development, whereas South of Riccarton does (Corridor 8) and should therefore be supported as a sustainable location for development.

Due to the inconsistencies and unjustified conclusions of the Housing Study we have carried out our own Housing/Sustainability Study of the chosen sites in west Edinburgh and compared this with South of Riccarton. This assessment is provided at **Appendix 6**. The conclusion of this assessment scores the sites as following:

- South of Riccarton= **17**
- East of Riccarton= **16**
- West Edinburgh= **15**
- Crosswinds= **11**
- Kirkliston= **- 1.5**
- Calderwood= **- 6**

Therefore, Wallace objects that South of Riccarton has not been chosen as a proposed greenfield site in west Edinburgh and objects to the site choices of Kirkliston and Calderwood as they are unsuitable and not sustainable.

In addition, Wallace objects to the site choices of West Edinburgh and Crosswinds as the national policy (NPF3) includes these sites within a 'Strategic Airport Enhancements' area, which is stated as being a business led, employment generating area, with no specific provision made for housing. Indeed, both Edinburgh Airport and British Airways strongly objected to the principle of residential development in this area in the previous Local Development Plan, whilst also raising noise and traffic concerns. The national policy direction would therefore need to be changed, and these concerns addressed before housing sites could even be considered as suitable and deliverable allocations within this area.

## **Conclusion**

This representation has undertaken a detailed review of the Edinburgh Choices for City Plan 2030 and its supporting evidence base and has identified a number of major flaws and inconsistencies in the site selection process, focusing on housing release in west Edinburgh. Due to this Pegasus has undertaken our own Environmental and housing study scoring exercises.

This exercise concludes that South of Riccarton is the highest scoring site when compared against the Council's preferred site choices for west Edinburgh. This is due to its landscape capacity for development, relatively few environmental constraints, direct access to existing public transport facilities (train, bus) that can be enhanced within the plan period, direct access to employment

---

opportunities at Heriot-Watt (economic growth hub) and the potential for education and service improvements (new Riccarton Village centre).

In light of these facts, we respectfully request that South of Riccarton is considered as a potential greenfield release site for west Edinburgh.

---

## **1. INTRODUCTION**

- 1.1 These representations have been prepared on behalf of Wallace Land Investments (“Wallace”) in relation to the Edinburgh Choices for City Plan 2030 and should be read in conjunction with the further representations submitted on South of Riccarton by Geddes Consulting on behalf of Wallace.
- 1.2 This report focuses on how greenfield sites in west Edinburgh have been considered and assessed in the supporting evidence, with specific reference to the Wallace site South of Riccarton. These representations focus on the Council’s evidence base documents supporting the Choices for City Plan.
- 1.3 For clarity, this report relates to the main Edinburgh Choices for City Plan 2030 consultation document issued by the City Council in January 2020 and the associated evidence base documents issued alongside it, including:
- City Plan 2030 Environmental Report (and Non-Technical Summary);
  - Choices for City Plan 2030 - Monitoring Statement;
  - Choices for City Plan 2030 – Housing Study, Jan 2020 (Part 1 and Part 2);
  - Choices for City Plan 2030 – Integrated Impact Assessment - Summary Report - Jan 2020;
  - Choices for City Plan 2030 – Financial Resources Appraisal;
  - Edinburgh Strategic Sustainable Transport Assessment, Jacobs, Oct 2019;
  - Draft City Mobility Plan, Jan 2020;
  - Edinburgh City Plan 2030 – Landscape and Visual Assessment of Greenfield Sites, April 2019; and
  - Development Plan Scheme, Jan 2020.
- 1.4 Wallace has grave concerns about the following aspects of the Choices for City Plan and the direction of travel that appears to have been taken by the City Council so far:
- The Environmental Report supporting the City Plan does not assess all reasonable alternatives and therefore fundamentally fails the requirements of EU SEA Directive and associated Scottish law associated with the assessment of environmental impacts;
  - The evidence supporting the Choices for City Plan has been misinterpreted or misrepresented within the Choices for City Plan document itself, leading to unjustified and inconsistent outcomes;
  - The site selection process that has resulted in the currently chosen greenfield sites is not transparent and entirely missing in the context of certain alternative locations; and

- The aspirations set out within the plan as currently drafted are not consistent with certain policies set within national planning policy.
- Selecting preferred sites at this early stage of the Edinburgh Plan is also considered somewhat premature given the evidence base is still emerging in respect of the Edinburgh Strategic Sustainable Transport Strategy Stage 2 and West Edinburgh Spatial Strategy.

1.5 We address the following aspects within this document:

- **Section 2** highlights how EU and Scottish environmental legislation needs to be addressed and why the Choices for City Plan 2030 document and its associated Environmental Assessment falls short of these requirements;
- **Section 3** provides a critique of the transport evidence (notably the City Mobility Plan and Strategic Transport Assessment) which identifies errors that have carried through to the site scoring within the Environmental Report and Housing Study;
- **Section 4** reviews the Council’s Landscape Assessment, which does not assess sites on a consistent basis compared to the Environmental Report and other related documents;
- **Section 5** provides a detailed critique of the Council’s Environmental Report, which identifies flaws and inconsistencies in the overall approach as well as the assessment of individual sites.
- **Section 6** addresses the Council’s Housing Study, which includes errors and inconsistencies (including those related to the transport evidence as noted in section 2).
- **Section 7** summarises our responses to various sections of the Choices for City Plan cross referring to previous issues raised and national planning policy requirements.

---

## 2. STRATEGIC ENVIRONMENTAL ASSESSMENT PROCESS & OBLIGATIONS

- 2.1 Strategic Environmental Assessments (SEA) and Sustainability Appraisal legislation is found in European Directive 2001/42/EC and was transposed into Scottish Law through the Environmental Assessment (Scotland) Act 2005<sup>1</sup>.
- 2.2 The Act requires that an environmental assessment is undertaken on all plans, programmes and strategies of a public nature which are likely to have significant environmental effects. Detailed guidance on these regulations are contained within Scottish Government's guidance note on Strategic Environmental Assessments<sup>2</sup>.
- 2.3 Part 4 of the Act confirms that the European Directives will apply plans and programmes which are subject to preparation or adoption (or both) by a responsible authority at national, regional or local level. Edinburgh City Council is a responsible authority and this plan is being prepared at the local level. Part 5(3) of the Act confirms such plans include those for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, **town and country planning or land use** and sets the framework for the future development consent of projects listed in Schedule 1 of the Act, which lists a range of industrial and infrastructure related development sectors.
- 2.4 The Choices for City Plan therefore qualifies as a plan that requires a Strategic Environmental Assessment. This is endorsed by paragraph 65 of Circular 6/2013 Development Plans, which confirms that a SEA (and HRA) is required for **all** Local Development Plans.
- 2.5 As confirmed at paragraph 1.2 of the SEA guidance:
- 'SEA is a means to judge the likely impact of a public plan on the environment and to seek ways to minimise that effect, if it is likely to be significant.'*
- SEA therefore aims to offer greater protection to the environment by ensuring public bodies and those organisations preparing plans of a 'public character' consider and address the likely significant environmental effects. Under the Environmental Assessment (Scotland) Act 2005, those bodies preparing qualifying Scottish plans are required to undertake a SEA of plans that are likely to have significant environmental effects, if implemented.*
- 2.6 Sections 3E of the Town and Country Planning (Scotland) 1997 Act also require that functions relating to the preparation of the National Planning Framework by Scottish Ministers and development plans by planning authorities must be exercised with the objective of contributing to sustainable development.

---

<sup>1</sup> <http://www.legislation.gov.uk/asp/2005/15/contents>

<sup>2</sup> <https://www.gov.scot/publications/strategic-environmental-assessment-guidance/>

2.7 Section 44 of the Climate change (Scotland) Act 2009 also sets out that public bodies (which includes planning authorities) must, in exercising their functions, act in the way best calculated to contributing to the delivery of the climate change targets set out in that Act.

2.8 Critically, Article 5(1) of the SEA Directive states:

*'Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and **reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated.** The information to be given for this purpose is referred to in Annex I (**our emphasis**).'*

2.9 The relevant Annex confirms the information to be provided under Article 5(1), subject to Article 5(2) and (3), is the following:

- a) *an **outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;***
- b) *the **relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;***
- c) *the **environmental characteristics of areas likely to be significantly affected;***
- d) *any **existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;***
- e) *the **environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;** (i.e. an assessment of national and strategic planning policies and other relevant objectives for the area).*
- f) *the **likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;***
- g) *the **measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;***
- h) *an **outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties***

*(such as technical deficiencies or lack of know-how) encountered in compiling the required information;*

- i) **a description of the measures envisaged concerning monitoring** in accordance with Article 10;
- j) *a non-technical summary of the information provided under the above headings.*
- k) **That these effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects (our emphasis).**

2.10 It is therefore clear that in preparing a Local Development Plan there is a need to consider an array of issues and options (including reasonable alternatives) and test how these might impact on the environment, climate change and the need to promote sustainable development as defined by national planning policy. Indeed, testing various options in a consistent and transparent manner allows a public body and a decision maker to come to the best possible judgement as to how an initial plan, a preferred option and final adopted development plan should be configured to minimise the impact of the plan on the environment and the various issues raised under Annex I of Article 5(1) of the SEA Directive. Providing a consistent, objective and transparent assessment also allows for a more robust, fair and open public consultation exercise to take place. We have serious concerns that the Council's decision making process in relation to the Main Issues and Options version of the plan (i.e. the Choices for City Plan) has been compromised by the approach adopted by the Council so far.

2.11 In this case, one of the critical considerations for the Choices for City Plan relates to the scale of new homes required to house existing and future population and how this can be achieved in the context of achieving 'sustainable development'.

2.12 The new homes will most likely result in an increase in the local population within Edinburgh and the preferred spatial distribution of this population will have an impact on key services (such as schools) and key infrastructure, including transport infrastructure. Considering these issues alongside the SEA requirements associated with the likely effects on the environment as listed under criteria f of Article 5(1) of the SEA Directive is therefore critical.

2.13 Indeed, paragraph 274 of the Scottish Planning Policy (SPP) specifically states the following:

*In preparing development plans, **planning authorities are expected to appraise the impact of the spatial strategy and its reasonable alternatives on the transport network**, in line with Transport Scotland's DPMTAG guidance. This should include consideration of previously allocated sites, transport opportunities and constraints, current capacity and committed improvements to the transport network. **Planning authorities should ensure that a transport appraisal is undertaken at a scale and level of detail proportionate to the nature of the issues and proposals being considered, including funding requirements. Appraisals should be carried out in time to inform the spatial***

---

***strategy and the strategic environmental assessment.*** *Where there are potential issues for the strategic transport network, the appraisal should be discussed with Transport Scotland at the earliest opportunity (**our emphasis**).*

- 2.14 In the context of the Choices for City Plan, therefore, an accurate assessment and portrayal of the existing transport infrastructure supporting the City is critical as is a clear understanding of all other environmental impacts.
- 2.15 We note the Council have produced a City Mobility Plan and this is informed by the Edinburgh Strategic Sustainable Transport Study (ESSTS) (Phase 1) carried out by Jacobs, which we will comment on in more detail below and within **Section 3**. However, it is pertinent to note that there are critical inaccuracies in the Jacobs document relating to an existing rail service to the existing settlement of Currie. Moreover, Map 3 within the Choices for City Plan Document, which depicts the proposed sustainable transport corridors from the Jacobs report, is also inaccurate in terms of its positioning of the Proposed Strategic Public Transport Corridor 8. Both of these errors would notably impact on any Environmental Assessment and considerably impact on judgements made towards Wallace’s site at South of Riccarton.
- 2.16 Figure 2 within the 06/2013 Development Plan Circular confirms that an Environmental Assessment should be consulted upon at the main issues stage. In light of this, the Council have prepared an Environmental Report and this forms part of the current consultation process. The opening paragraph of the report confirms the main purpose of the report which is to:
- ‘Provide information for Edinburgh’s City Plan 2030 at the Choices for City Plan 2030/Main Issues Report (MIR) stage;
  - Identify, describe and evaluate the likely significant environmental effects of the preferred approach to the choices in the MIR and any reasonable alternatives;
  - Consider the potential environmental effects of potential new development sites to inform the preferred approach and reasonable alternatives to be identified in the MIR.’
- 2.17 The report does provisionally seek to provide a considered assessment of the likely impacts on each of the items under criterion f of Annex I of the SEA Directive. However, the assessment only considers the sites that have been put forward within the Choices for City Plan, rather than a full range of potential sites so as to inform the sites that should form part of the City Plan. This is not in keeping with the spirit or indeed legal requirements of the SEA process which must assess all reasonable alternatives. Indeed, without a similar assessment of alternative potential greenfield sites, it is not possible to determine if the ones chosen are the most suitable when considering their impact on the environment and other policy objectives.
- 2.18 Paragraph 64 of Circular 6/2013 provides further advice in the context of producing a robust, timely and transparent Environmental Assessment and importantly confirms that developers and land

promoters should be given the opportunity to submit their sites to local planning authorities to ensure their sites can be tested through the SEA process at an early stage. It states:

*'Many authorities run a "Call for Sites" prior to preparing the Main Issues Report. This is not a requirement of the legislation, but it can be a useful part of the process. This stage allows landowners and prospective developers to put forward for consideration by the planning authority the sites for which they have an aspiration for development. **It is important in meeting the requirements for strategic environmental assessment that full information on sites and alternative options is submitted early and not held back until the later stages of plan preparation or even the Examination.** Promoters of sites would be advised to respond positively at this point, and to provide the necessary evidence to justify their site's inclusion as a preferred option at the Main Issues Report stage. **Engaging at this early stage is likely to ensure that the planning authority is able to properly assess the merits of the proposal, with it being more likely to be subject to public engagement and strategic environmental assessment at the Main Issues Report stage and to neighbour notification at the Proposed Plan stage (should the planning authority propose that the site be allocated in the plan) (our emphasis).'***

- 2.19 In this case, the Council have not undertaken a Call for Sites exercise. As noted by the Circular, this is not a legal requirement but given the plan relates to Edinburgh: Scotland's capital and most influential city, adhering to the government's guidance within the Circular would seem entirely prudent in this instance.
- 2.20 Notwithstanding this, we are aware that Wallace did provide details of their land South of Riccarton in June 2018 to the Council. These details demonstrated that the site was available, suitable and deliverable for a strategic residential led, mixed use development with capacity for over 3,000 homes, new schools, new public transport provision and a new local centre. This detail was provided in advance of the Environmental Assessment being prepared. Notwithstanding this, the site has not been assessed within the Environmental Assessment as a preferred site or even as a reasonable alternative.
- 2.21 Interestingly, the site is actually depicted on some of the plans at Appendix 6 of the Environmental Assessment including the Biodiversity, fauna and flora plan and the Active Travel Plan and in both instances it is defined as a 'Potential Greenfield' site along with the land East of Riccarton. This would seem to indicate that the Council and the authors of the Environmental Assessment were fully aware of the site. However, there is no proforma assessment of the South of Riccarton site and there is no direct explanation as to why it has been excluded from the Environmental Assessment, despite clearly being a reasonable alternative to many of the other potential housing greenfield sites assessed.
- 2.22 A partial explanation can be found on page 24 of the Environmental Assessment under the heading 'Greenfield Sites'. It is stated that a detailed assessment was undertaken of all greenfield sites around Edinburgh and detailed information on the assessment work undertaken can be found in

---

the supporting Housing Study, which is also issued for public comment as part of this consultation process.

- 2.23 There are obvious shortfalls associated with this approach. Critically, the assessment criteria in the Housing Assessment are not the same as those in the Environmental Assessment (See **Appendix 1** – which lists all the criteria across the 2 documents).
- 2.24 Whilst there is some overlap in relation to some of the topic areas, the differences in approach are evident by the range of questions asked and the topics covered. Perhaps the most startling omission is the lack of any questions associated with ecological designations and habitats within the Housing Study. As such, the Council cannot claim to have undertaken a compliant SEA assessment of reasonable alternatives, particularly when it comes to the selection of housing sites simply by cross referencing the Housing Assessment. Indeed, there is no consideration within the Housing Study relating to the proximity of sites towards European protected areas such as RAMSAR sites located on the coast. As such, there has been no genuine assessment of how certain proposed Greenfield Housing sites might impact on these areas either through the intensification of their use (and disturbance) by a new, larger localised population located next to these areas, or on supporting habitat for certain species associated with the RAMSAR site or any other ecological designation. This is a serious shortfall in the Council’s approach to site selection that must be addressed.
- 2.25 Secondly, the matter is compounded by the fact that the assessment in Housing Study adds preferential treatment and commentary towards the preferred sites within the Choices for City Plan document in relation to a number of topics. Clearly this circumvents any ability to carry out an objective assessment of reasonable alternatives when coming to undertake the Environmental Assessment. Indeed, the Council have confirmed within the Environmental Assessment<sup>3</sup> itself that the parameters of the Environmental Assessment in terms of testing reasonable alternatives (including alternative site options) is based on the outcomes of the Housing Study.
- 2.26 We provide a more detailed analysis of each of the currently identified sites in the Choice for City Plan and a detailed assessment of Wallace’s site in subsequent sections; however, in order to help demonstrate and articulate some of the issues raised by the Council’s site selection approach and how this impacts on the legal requirements of an SEA, we draw reference to the Housing Study assessment of the East of Riccarton Site (which is a preferred site in the Choices for City Plan document) (see pages 160 to 162) and Wallace’s South of Riccarton site (see pages 165-167). We do not pick out the East of Riccarton site to be directly critical of this site but simply to highlight the inconsistent approach applied in the Council assessment.
- 2.27 Notably both sites are of a similarly large scale and can deliver a significant number of homes and associated facilities. Both are also fully located within the Strategic Public Transport Corridor 8 and both border the Heriot-Watt University, which we have assumed must be regarded as an

---

<sup>3</sup> See ‘Greenfield Sites’ section on page 25 of the document.

Employment Cluster location given the University's scale and proximity of accompanying businesses in the area.

- 2.28 One example of an alternative approach being taken when it comes to assessing the two sites within the Housing Study is under the Active Travel question '*Does the site support travel by foot to identified convenience services?*'. The East of Riccarton site obtains an amber/partially rating with the following commentary and analysis:

*'The site is not within walking distance to local convenience services. Convenience services can be provided on the site due to scope for development here.'*

- 2.29 As such, the Council have raised the site's status from what would have been a red/no rating based on the existing situation (which is correct as there are no convenience stores within a reasonable walking distance) due to what the Council envisage could be delivered on the site through development. That is itself is not a problem and a perfectly reasonable approach to take. However, consistency must then be applied to similar sites, where it is known there is the ability to provide new services.

- 2.30 In comparison, the South of Riccarton site obtains a red/no rating with the following commentary and analysis:

*'The site is not within walking distance to local convenience services. It is unlikely that access can be improved, and convenience services are unlikely to be provided on the site due to lack of scope for development nearby.'*

- 2.31 There are two issues with this assessment. Firstly, the southern most parts of the site are actually within a reasonable walking distance to convenience services located within Currie. There is a local/neighbourhood centre located within 700m from the edge of the site located between the A70 and Pentland View. The centre contains a Co-op convenience store, pharmacy, library, various take-aways, a pub and other services. Between the edge of the site and the local centre, there is an existing footpath with street lighting all the way down Curriehill Road. There is a slight upward incline towards the end of the route but it is perfectly walkable. The benchmark walking distance / time used in the Housing Study assessment is confirmed to be 800m / approx. 10 minutes. An alternative parade of shops is also located Bryce Road and Corslet Place, which is also just within the 800m / 10 minute walking time distance from the edge of the site.

- 2.32 Whilst we note that the 800m distance would be exceeded if measured from a central location within the site, there are parts of the site that would clearly rank green on the above analysis. We suspect the same is true of the East of Riccarton site too but there will be other sites assessed within the Housing Study that do not come anywhere close to these measurements and distances. Indeed, our client's site is lumped in with all other far more remote sites when it comes to this criterion.

- 
- 2.33 Notwithstanding this, the primary issue with the Council’s assessment of both sites is that they fail to recognise that the South of Riccarton site can and would also deliver new convenience services. This has been made very clear in the promotion material issued by Wallace to the Council. The scale of the development would generate more than sufficient retail expenditure to justify a new local centre. As such, there is no basis for the Council to conclude that the position is unlikely to be improved and that convenience services are unlikely to be provided on the site due to the lack of development nearby. To rank the site red rather than amber is therefore entirely inconsistent with the approach adopted on other sites (namely those the Council have currently chosen to put forward in the Choices for City Plan). The only reasonable conclusion would be to elevate the site’s status to Amber in this respect.
- 2.34 The same approach is taken in relation to questions associated with the ability to improve community infrastructure (i.e. school provision), which we address in more detail in Section 6 of our representations but is notable that the East of Riccarton site is given the rank of amber/potential when considering the ability to provide new schools whilst the South of Riccarton site is ranked red/no despite the fact that Wallace has confirmed the development is of a scale that would be capable of delivering new education provision.
- 2.35 Reference is also made under the South of Riccarton site assessment that new Secondary School provision would be required due to capacity issues at Currie High School and that a new secondary school would have to serve a wide catchment area so good active travel and transport links would be necessary. Notably, no reference is provided in relation to the site’s proximity to Curriehill train station within this section and what scope this existing infrastructure offers in order to address catchment areas for a new school. Indeed, no ‘deep dive’ analysis is provided in relation to the education programme for the area within the Housing Study and the analysis of the site is simply closed off by saying *‘There is not enough scope for development on this and nearby sites to support this level of intervention’*. We refute this position on the basis that insufficient evidence has been provided to come to this conclusion.
- 2.36 Perhaps the most onerous component of the Council’s assessment relates to how the sites score in the context of access to public transport provision. (remembering that paragraph 274 of the SPP confirms a robust assessment of public transport provision should be undertaken to inform site selection and the SEA process – see paragraph 3.13 above). Both sites generate red/no ratings within the Housing Study in relation to the following questions and are given the following analysis / commentary:
- ‘Does the site support travel by public transport through existing public transport network accessibility and capacity?’
- ‘No – the site does not support travel by public transport based on existing or incrementally improved provision.’*
- ‘Is the site potentially served by an identified public transport intervention project which is deliverable in the plan period to serve and accommodate development?’
-

---

*'No – the site may support travel by public transport based on an identified intervention, but this intervention is not deliverable within the plan period.'*

2.37 Again, no reference is made to the fact that the site is located directly adjacent to Curriehill train station, with the entirety of the site falling within which has a regular and frequent half hourly service to Edinburgh during AM and PM peak times and an hourly in-between. Had this been acknowledged within the Council's evidence, we cannot foresee how the Council could reach the above conclusions in relation to public transport access for the South of Riccarton site.

2.38 We address public transport issues and the Council dedicated evidence on this in more detail in Section 3. However, on page 6 in Appendix 2 of the Housing Study, the Council confirms how the sites are scored in the context of these two questions and states the following:

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

*Assessed based on Edinburgh Strategic Sustainable Transport Study (ESSTS) input which assesses corridor and site accessibility through TRACC public transport analysis taking into account passenger volume over capacity (V/C) on key routes and bus frequency along corridors.*

*The ESSTS has used a red/amber/green scoring system for the sites, so where the site scores green in this assessment this will be classed as yes [green]. Where the site scores amber in this assessment it will be classed as partially suitable [amber]. Where the site scores red in this assessment it will be classed as no [red].*

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

*The ESSTS has identified public transport interventions that could enhance the accessibility, capacity and quality of the overall public transport network. This stage of the study does not make specific route/modal recommendations, but has identified those corridors where major transport enhancements should be considered in more detail based on a range of criteria. These criteria were scored in the study and the corridors which scored sufficiently well against criteria are to be taken forward for further consideration.*

*The study uses a similar red/amber/green scoring system to score the future accessibility of sites taking into account future intervention. The overall assessment should be a composite taking into account the access and capacity assessment above and any required interventions.*

*If the site sits alongside an identified corridor improvement with a long-term score of green or has an existing score of green with no identified corridor improvement this will be classed as yes [green]. If the site sits alongside an identified corridor improvement with a long-term score of amber or has an existing score of amber with no identified corridor improvement this will be classed as partially suitable [amber]. If the site sits alongside an identified corridor*

---

*improvement with a long-term score of red, or if the site is not along an identified corridor or still has a long-term score of red this will be classed as no [red].*

- 2.39 As such, we seemingly need to turn to the ESSTS to determine why each site in the Housing Study obtains the score it does in relation to this issue. This document is prepared by Jacobs and dated October 2019. It helpfully provides reference to a number of public transport corridors and options associated with where new public transport infrastructure could be targeted. However, it certainly does not assess the individual sites assessed within the Council’s Housing Study. As such, we can only assume there is another assessment available to the Council that does review the accessibility score of each site in the Housing Study but this has not been made publicly available and is therefore not subject to any scrutiny or interrogation as part of this consultation exercise. Again, we raise the issues over transparency bearing in mind this all ultimately ties back to the approach adopted by the Council to assess reasonable alternatives for the purposes of the SEA.
- 2.40 To conclude, the Council’s Environment Assessment is fundamentally flawed by the fact that it does not assess a reasonable selection of alternative sites or alternative spatial distribution options for accommodating Edinburgh’s future housing needs. This is compounded by the fact that the Environmental Assessment only assesses sites that make it through the Council’s site selection process set out within the Housing Assessment, which adopts a very different set of questions and parameters to the Environmental Assessment and is not entirely objective when considering all issues (as highlighted above). In light of this, the approach adopted by the Council to date fails the requirements of EU Directives and Scottish environmental and planning law.
- 2.41 It is also pertinent that other evidence base documents are still under preparation, which could have a material bearing on site selection and the SEA process, including the West Edinburgh Spatial Strategy (commissioned by the Council, Scottish Government, Scottish Future’s Trust and Scottish Enterprise, and being undertaken by Rettie, Aecom and Collective Architecture) and Phase 2 of the ESSTS, and therefore it is arguable that selecting preferred sites at this early stage is somewhat premature. Wallace therefore, object to the proposed sites (Calderwood, Kirkliston, West Edinburgh, East of Riccarton & Crosswinds) in west Edinburgh at the present time.
- 2.42 As a final point, we note that the Council have not provided a formal Habitat Regulation Assessment at this stage either and whilst we note the Environment Assessment touches on the various ecological habitats within the area, this does not satisfy the requirement to prepare a dedicated HRA. This must be addressed and should inform the Council’s overall development plan strategy.
- 2.43 In summary, this section has highlighted a number of critical shortfalls in the Council’s evidence base when it comes to tying this into the Council’s obligations to test reasonable alternatives under Strategic Environmental Assessment Directives. The following sections look at the key evidence base documents in more detail.

---

### 3. CRITIQUE OF TRANSPORT EVIDENCE BASE

- 3.1 This section reviews the Council’s Strategic Sustainable Transport Assessment (ESSTS) prepared by Jacobs in October 2019. The report largely focuses on the suitability of a number of corridors and their suitability for improved public transport access and investment. Wallace’s site sits within Corridor 8 (West of Hermiston).
- 3.2 The first point to highlight with this assessment is that it is highly geared towards assessing suitable corridors for ‘transit-based solutions’ as confirmed at paragraph 1.10. Paragraph 1.12 goes on to confirm that the working definition of this term for this assessment relates to public transport solutions that would deliver a *‘step-change in provision above existing services, or that could be delivered from more incremental improvements such as service frequency enhancements.’*
- 3.3 The following paragraphs go on to reference tram and Bus Rapid Transit modes and the remainder of the Jacobs assessment focuses specifically on the ability to increase the local public transport network using these particular modes. Indeed, limited reference is given to existing rail infrastructure on the basis that this is being addressed at a national level through the Strategic Transport Projects Review 2 (STPR2) and therefore rail based interventions / solutions (and indeed capacity at existing stations) is not considered by Jacobs. However, it must go without saying that the existing rail network is clearly a key existing piece of public transport infrastructure that should be optimised and considered through a Local Development Plan process. This is not to say the Jacob’s work is not useful but it cannot be regarded as being complete and would indicate that the transport related evidence base supporting the Local Development Plan is not sufficiently thorough to determine what the most appropriate and optimal solutions might be in terms of delivering sustainable development and spatial development options for Edinburgh. Indeed, a part modal transport assessment is not endorsed by National Planning Policy and paragraph 274 of the SPP does not distinguish between the different modes of transport that a Transport Appraisal should consider.
- 3.4 With that in mind, a compelling part of Wallace’s case to support development at South of Riccarton is the proximity of the site to Curriehill Train Station. The site abuts the station and provides suitable land that could be utilised for extended car parks/park and ride facilities and other public transport infrastructure to create a public transport hub/interchange.
- 3.5 On page 34 of the Jacobs assessment, which incorporates the baseline review for Corridor 8, it is noted that the rail service from Curriehill station is hourly. However, this is incorrect, in fact the station provides a half hourly or better service during the peak hours (07:00-08:30 and 17:30-18:30) which has not been factored into any of the assessments carried out by the Council as far as we can see. The rail service from Curriehill station now includes the following:

***Departing Curriehill to Edinburgh***

- 6:59 am

- 7:27 am
- 7:54 am
- 8:11 am
- 8:31 am
- Then hourly service until 20:29 pm

***Returning from Edinburgh to Curriehill***

- 17.26 pm
- 17.50 pm
- 18.26 pm
- 18:56 pm
- 19:26 pm

3.6 This must be reflected and rectified in the transport evidence, Housing Study and Environmental Assessment.

3.7 In particular, this level of service needs to be reflected on Figure 4.5 of the Jacobs assessment, which provides a heat map ranking to areas along public transport corridors and may well have influenced the assessment within the Housing Study regarding access to public transport, and has certainly influenced the Environmental Report as this same heat map is included within Appendix 6 of this document. Indeed, we note that the site and area is shaded green (ranked 1/low) on Figure 4.5 but we cannot conceivably see how that this would be the case with the above service and frequency accounted for.

3.8 It takes only 30 minutes to get to the centre of Edinburgh on most services and the 07:56 morning service only takes a speedy 16 minutes due to missing out certain stops between. This represents a frequent service for commuters to Edinburgh and allows the site to be classed as being well connected by public transport as it stands and notwithstanding the scope for further improvement of this service and additional integration with other public transport modes through the delivery of new development and associated infrastructure as suggested by Jacobs for Corridor 8.

3.9 Notably, in the baseline assessment for Corridor 8 (West of Hermiston), the following other observations are made by Jacobs:

- ***Route:*** *Broad corridor west of Hermiston, encompassing Heriot-Watt University and Curriehill station and future potential development areas.*
- ***Transport Context:*** *Bus services serve Heriot-Watt and Hermiston P&R.*

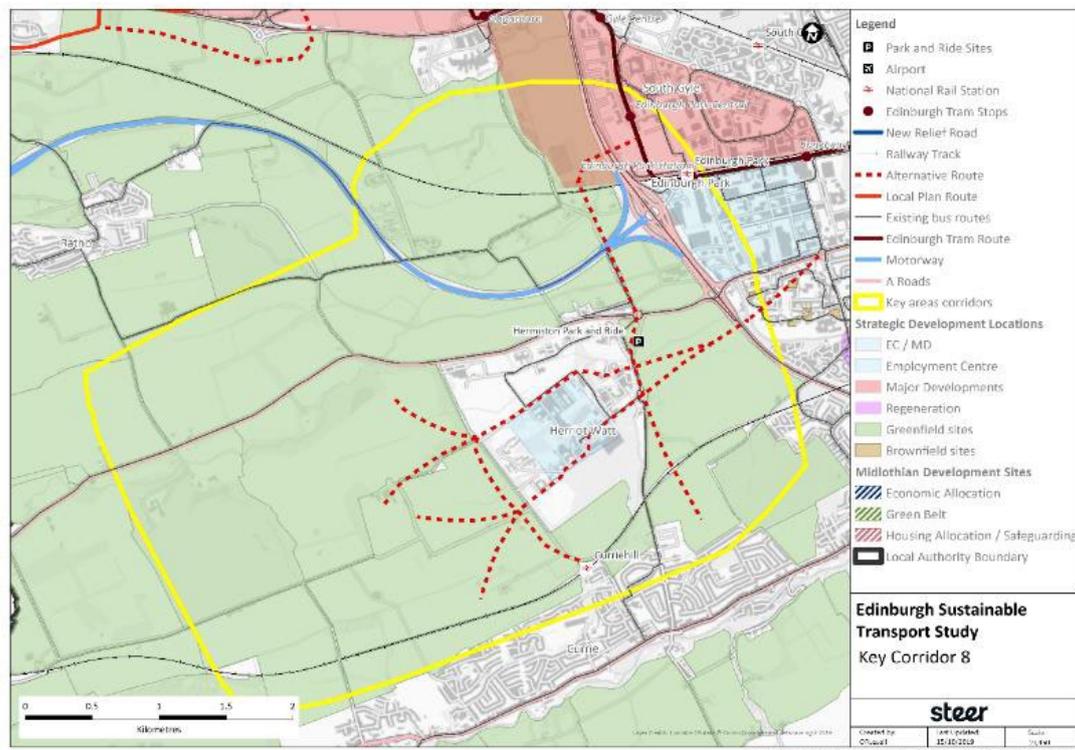
- **Transport Context:** Rail services from Curriehill (hourly at present) – see above comments.
- **Development Context:** Significant potential for greenfield development land (being considered through the City Plan process), which transit could help to bring forward in a sustainable manner.

3.10 Under the heading ‘**Opportunities**’ the following is stated:

- Significant greenfield land offers potential for transit-led development and urban-extension;
- Opportunities to connect to Heriot-Watt, Hermiston Park and Ride and Curriehill Station;
- Opportunity to link with existing tram route (around Edinburgh Park or Bankhead) or for bus-based transit options.

3.11 Curriehill station is therefore a key component of Corridor 8 and this is corroborated by Figure 9.1 on page 80 of the Jacobs assessment (copied below). The yellow boundary illustrates the correct boundary of the corridor.

*Figure 3.1 – Plan from Jacobs Assessment showing Key Corridor 8:*



3.12 Notwithstanding this, we note that the corridor area has seemingly shrunk and been misrepresented on Figures within the Jacobs report as the following figures do not include Curriehill station within the boundary of Corridor 8:

- Figure 4.1 – Strategic Corridors
- Figure 4.2 – Population Density
- Figure 4.3 – Employment Distribution
- Figure 4.4 – Scottish Index of Multiple Deprivation
- Figure 4.6 – Accessibility (Journey Time) to the City Centre
- Figure 4.7 – Accessibility Journey Times
- Figure 4.8 – AM Base Model Public Transport Demand
- Figure 4.9 – AM Base Model number of buses per hour
- Figure 4.10 – AM Base Model Bus Volume Capacity Ratio

3.13 Given the supporting text in the Jacobs report and the more detailed plan at Figure 9.1, we can only assume the above figures have been drawn up incorrectly. However, it is an important error as it results in the omission of Curriehill station from these figures and suggests Corridor 8 is not as centrally aligned with the University or proximate to the settlement with Currie and its associated services. Moreover, these figures suggest the land interests of our client are not within the Corridor when it clearly is by reference to Figure 9.1.

3.14 These errors must be corrected. Failure to do so misrepresents our clients site and we cannot be certain that the authors of other supporting evidence base documents, including the Housing Study, and authors of the Choices for City Plan would not have been influenced by these incorrect Figures and information when drafting these documents and specific site appraisals. Indeed, the fact that the Housing Study assessment of our client’s site suggests that public transport improvements would not be feasible to support development on the site is entirely at odds with the actual conclusions of the Jacobs assessment and Figure 9.1 which clearly show new links being provided to our client’s site.

3.15 Critically, Map 3 on page 17 of the Choice for City Plan 2030 continues this misrepresentation and shows Corridor 8 as excluding half of the University and Curriehill station. Irrespective of whether this is a simple drafting error, it is clearly misleading the public, landowners and other interested bodies in relation to the Plan and the accompanying evidence base. This raises serious questions over the validity of this initial consultation process.

3.16 Furthermore, the Choices for City Plan 2030 has failed to adequately justify why only two of the defined transport corridors, 3 – ‘South East Edinburgh via BioQuarter’ and 7- ‘Towards Newbridge and IBG’ have been chosen for further assessment for the delivery of new transit solutions; when the ESSTS concludes that four corridors should be assessed further, including Corridor 8 which covers the South of Riccarton site (which we address in more detail below).

- 3.17 Notwithstanding the above comments, we do support a number of the findings within the Jacobs assessment. We accept the principal benefits of strategic land use planning being aligned with strategic transport infrastructure investment. We also support and recognise the ability of transit in the form of trams and Rapid Bus Transit corridors to stimulate investment, improve health and wellbeing, safeguard our environment, and help deliver new sustainable communities. We simply reiterate our point that existing rail infrastructure also offers this opportunity.
- 3.18 With regard the 'sifting stage' at Section 5 of the Jacobs report, a summary of Jacob's sifting exercise is provided in Table 5.2 (copied below as our Figure 3.2). However, there is no associated commentary or specific assessment to determine how the scores are arrived at. As such, we have to assume this is simply based on a judgement of the author. That said, based on how the majority of the report is drafted, it is clear that Jacobs' assessment is heavily weighted towards tram infrastructure despite the fact that bus and rail provision should also impact on any scores, particularly in the context of Corridor 8.

*Figure 3.2 – Conclusion Table from Jacobs Assessment*

Table 5-2: Transit Assessment - Summary Findings

Corridor	Base demand	Development Demand (existing LDP)	Accessibility to support new areas for development in sustainable manner	Baseline inequality (Scottish IoMD)	Route alignment feasibility	Attractiveness to passengers (proxy for Value for Money)	Score (unweighted)	Suitability for tram / transit (Y / N)
New Town to Granton via Newhaven (1)	2	3	0	2	2	1	10	Y
Portobello / M'burgh (2)	2	2	0	2	1	1	8	N
South East via Bio-Q (3)	3	3	3	3	2	2	16	Y
Straiton (4)	2	1	2	2	1	1	9	N
South Suburban (5)	2	1	0	2	1	1	7	N
Granton (6)	2	3	1	3	2	2	13	Y
Newbridge (7)	1	2	3	1	3	2	12	Y
West of Hermiston (8)	1	1	3	1	3	2	11	Y
Queensferry (9)	2	1	2	1	1	1	8	N
W Edin North – South (10)	1	1	2	2	1	1	8	N

- 3.19 As noted, Corridor 8, Corridor 7 (towards Newbridge), Corridor 6 (Granton) and Corridor 3 (South East via Bio Quarter) have been shortlisted for further investigations for tram connectivity.
- 3.20 Of the corridors deemed suitable for tram transit, Corridor 8 scores 11 and this sits just 1 point behind Corridor 7 with the only difference relating to 'Development Demand' within the existing Local Development Plan. However, we note that it is stated that tram transit to Corridor 8 cannot be achieved if the investment is afforded to Corridor 7. It seems to be one or the other (see paragraph 9.7 of Jacobs assessment). Jacob's preference is afforded to Corridor 8.
- 3.21 Jacobs conclude at paragraph 8.15 that a bus-based or BRT transit option is the more appropriate solution for Corridor 7 and because of this, Jacobs suggest Corridor 8 should benefit from potential tram connections. Firstly we would note that the adopted LDP already safeguards extensions to the

existing tram network including connections to Newbridge<sup>4</sup>, whilst the City Mobility Plan specifically identifies an extended tram route to Newbridge as part of its vision to 2030, suggesting that Corridor 7 would be suitable and is being actively promoted for tram connections.

- 3.22 Whilst there is a strong case for Corridor 8 to benefit from tram transit as well due to the ability to connect to the university and surrounding employment clusters, which generate significant trips, it is also important to recognise that the South of Riccarton site is already well served by bus and train services.
- 3.23 As noted above, South of Riccarton already benefits from a 30min train service between Curriehill and Edinburgh in the peak hours. Furthermore, 11 bus routes currently serve the Riccarton Area (25, 34, 35, 45, 63, 23, X23, 27, X27/X28, 40/X40 and 44). Wallace's proposal includes the provision of a public transport hub adjacent to the existing Curriehill train station that could be utilised by buses during the early phases of development. This would provide connections to the university, employment cluster and better serve existing communities of Currie/Juniper Green by extending some bus routes to Curriehill. The additional demand created by the new and existing communities using the new bus services from Curriehill could support Bus Rapid Transit for quick and convenient access to the city centre.
- 3.24 If the City Council chooses to direct tram investment towards Corridor 8, bus connections could be provided to any future tram stop from this hub or trams could potentially access the hub in the future. This would make the South of Riccarton site one of the most accessible locations within the city region, which Wallace would clearly support.
- 3.25 Indeed, we understand that the ESSTS Phase 2 study is to be commissioned which will include further work on corridor 8 on the basis that Bus Rapid Transit can be a sustainable transport intervention for this corridor within the timescale of the LDP, which Wallace supports.
- 3.26 Within Section 9 of the ESSTS, which focuses on Corridor 8, we support many of the comments made and the suitability of greenfield land within the area offers an opportunity for an array of options, as depicted on Figure 9.1 (copied above) to connect sites. We also support the view that there is an '*excellent opportunity for strategic active travel infrastructure to be developed*'. Indeed, new green links through new development sites connecting to the university, the train station, the existing park and ride facility and towards the national cycle route networks 754 and 75, plus potential future tram stops, would all be entirely plausible.
- 3.27 We accept that providing a green link over the by-pass might be more challenging but the benefit of having good existing train and bus connections means that those undertaking a trip could utilise various modes on one trip to overcome such barriers.

---

<sup>4</sup> Table 9, Reference T1 at Page 37 of the Edinburgh LDP - November 2016

- 
- 3.28 Encouragingly, the assessment goes on to confirm that engineering options are likely to be feasible and there is no 'showstopper risk', which we concur with.
- 3.29 On the basis of South of Riccarton already being highly accessible by a range of sustainable modes (active travel/bus/train) it is in its present state more accessible than East of Riccarton, which has been chosen as a preferred greenfield site by the Council. Furthermore, South of Riccarton will create a transport hub at Curriehill to form a transport interchange supporting Bus Rapid Transit, deliverable within the Plan period. South of Riccarton is therefore the most sustainable site in west Edinburgh to locate greenfield development without major transport intervention and as such is not reliant on new tram infrastructure.

---

#### **4. CRITIQUE OF THE LANDSCAPE AND VISUAL IMPACT ASSESSMENT**

- 4.1 The Council's Landscape and Visual Assessment of greenfield sites was undertaken by Carol Anderson and Nigel Buchan with the final report issued in April 2019.
- 4.2 This divided the city into 6 geographical sectors defined by the Council, and a total of 139 greenfield parcels defined as Council Assessment Areas (CAAs) based on a range of factors including land ownership, landscape character and developer interest.
- 4.3 At the outset we would note that this categorisation is not consistent with other parts of the plan, both in terms of the overall sectors and the individual parcels (and their numbering) with no overall plan provided showing the different sectors; instead individual parcels are mapped by sector through the document.
- 4.4 By comparison, the Greenfield Parcel Assessment in Part 2b of the Housing Study splits the City into 7 sectors and 134 sites with some similarity in the sector and parcel boundaries but with different numbering (see **section 6**). The numbering is also different in the Environmental Report (see **section 5**).
- 4.5 These factors make a comparative analysis of greenfield land across the different evidence base documents extremely difficult and begs the question whether they could support a robust site selection process and consideration of reasonable alternatives (as discussed in section 2).
- 4.6 Furthermore, the individual parcel boundaries are not explained any further and whilst we acknowledge that wider landscape character areas don't always fit neatly with development sites, it is notable that the boundaries of two of the proposed Greenfield allocations, Kirkliston and Calderwood, have little correlation with the parcel boundaries used in the Landscape Assessment—with Kirkliston including small parts of parcels 20, 26 and 29 (in sector 5); and Calderwood containing a very small part of parcel 27 (in sector 4). This makes it difficult to draw firm landscape conclusions on two of the four greenfield sites that have been selected for release in west Edinburgh.
- 4.7 In terms of the methodology and approach to the study set out in section 3, it seems to conflate the assessment and importance of the wider Landscape Character Areas (LCAs) with the individual CAAs. It is our view that the overall features of the LCA are important contextually but shouldn't inform the detailed assessment conclusions here, given they are large scale/high level designations. Instead it should be focussed on the individual CAAs as these will inevitably have huge local variations in terms of their impacts, with such impacts even varying within these parcels.
- 4.8 In the assessment itself, the findings are listed in order of the different LCA, with individual parcel assessments amalgamated within each LCA section, again making it difficult to draw accurate landscape conclusions on individual sites, including 2 of the 4 greenfield sites proposed for release

in west Edinburgh. These include East of Riccarton which is covered under three different LCAS (29,30 & 31) and Calderwood which is covered by two (24 and 25).

4.9 Given the lack of clarity in the findings as presented we provide our own composite table below (Figure 4.1) and compare all the parcel assessments covering the four greenfield sites proposed for release in West Edinburgh. We also provide the assessment of South of Riccarton site being promoted by Wallace as an example of a site that is not proposed for release.

*Figure 4.1 – Conclusions of Landscape Assessment of West Edinburgh Sites*

Site	Sector	Council Assessment Area	Landscape Character Area	Key Designations	Assessment and Conclusions on Scope for Development	Overall conc
East of Riccarton	4	24 (East of Riccarton- all)	LCA 29 Gogar farmland and institutions – all		No commentary.	Scope for development but significant impacts
			LCA 30 East Hermiston farmland – all	Flood Risk Gogar Burn (24)	Notes CAAs are considered under LCA 29, but no specific commentary.	
			LCA 31 Baberton farmland - almost all.	Ancient Woodland (24)	CAA 24- Overall, it is considered that although some significant visual impacts and breaching of the existing settlement boundary provided by the bypass could arise there is scope to accommodate development in this CAA. This is due to its less strongly rural character and because opportunities exist to create new robust settlement boundaries to the west and south. Careful design would be necessary to achieve a cohesive development and enhance its landscape setting. This should include undergrounding high voltage transmission lines between the existing sub-station at Corslet and the two terminal towers close to the city by-pass. Generous landscape buffers should also be provided around the Murray Burn and Union Canal with associated enhancement and the creation of safe pedestrian and cycle routes across the M8 and A71.	
Kirkliston	5	19 (North Kirkliston- all), 20 (Craigbrae-part), 26 (Carlowrie Castle- part), 29 (Conifox-most)	LCA 10 Almond farmland – almost all.	Flood Risk (26), (29) / Designed Landscapes (26)	CAAs 19 and 20- There is no scope for development in this CAA. CAA 26- There is no scope for development in this CAA. CAA 29 - There is some scope to accommodate housing in this area, provided that the setting to Foxhall House, its parkland and walled garden is protected. There may also be opportunities to create an attractive riverside park and recreational routes in this area to enhance the landscape setting of Kirkliston.	No scope for development on majority of site
West Edinburgh	4	19 (Norton Park- all)	LCA 9 West Craigs Farmland – part	Flood risk over a small part of this CAA	CAA 19 - It is concluded that there is some scope for development in this CAA on the field lying to the west of Norton House Hotel and closer to Ratho Station.	Scope for development
Calderwood	4	26 (Overshiel-all) & 27 (Bonnington-small part)	LCA 24 Upper Almond Valley – part.	Special Landscape Area (26) / Ancient Woodland (26)	CAA 26 (only minor part) - There is no scope for development.	No scope for development on majority of site
			LCA 25 Bonnington farmland – most.	Ancient woodland (27) / Designed Landscape 133 (27)	CAA 27- excluded from the field assessment, due to the presence of constraints, including inclusion in the SLA, a designed landscape and its setting. CAA 26 - there is no scope to accommodate development in this CAA.	
South of Riccarton	4	45 (South of Riccarton- all) & 46 (Currievale-all)	LCA 27 Gowan Hill farmland - almost all.	Flood Risk Murray Burn (45) / Dalmahoy Inventory site - E part (45) / Core path 16, 17 (45)	CA45 & 46- There is scope for development to be accommodated on valley sides with opportunities to create a substantial Green Network and SUDs feature along the Murray Burn as a focus for any development. Off-road cycle and walking routes to Currie and Currie Station would need to be created and consideration should be given to undergrounding transmission lines with the visually discrete Long Dalmahoy area being a preferable site for terminal towers.	Scope for development but significant impacts

- 
- 4.10 A full version of this table is provided at **Appendix 2** including full descriptions of the LCA's and assessment conclusions.
- 4.11 This demonstrates that the conclusions have not been consistently applied when it comes to site selection, with the proposed allocations at Kirkliston and Calderwood considered to have 'no scope for development', whilst the land South of Riccarton is considered to have 'scope for development'.
- 4.12 There is no explanation for this in the main plan document, in terms of why landscape conclusions have been followed in some cases but not in others.
- 4.13 Moreover, based on the findings of the Landscape evidence, the land South of Riccarton should have clearly been considered for release.
- 4.14 Some reference can be found within the City Plan document and Housing Study as to why certain sites, such as the Kirkliston site options, have been included within the City Plan notwithstanding the clear recommendations of the Landscape Assessment. For instance, on page 15 of the City Plan, the following is stated:
- 'The Council is currently considering whether Kirkliston should have its own secondary school or whether alternative secondary school provision will have to be provided elsewhere. There is no site identified for a new secondary school and there is currently no funding in place.'*
- 4.15 On page 2 of the Executive Summary within the Housing Study, it is also noted that land East of Kirkliston is:
- 'Supported to deliver current Council priorities for the delivery of a new education infrastructure.'*
- 4.16 Further reference is also provided on page 313 which states:
- 'Any development should have regard to improving Queensferry Road for active travel and public transport, the need for a new secondary school in Kirkliston and the need for connection beyond the railway line to the existing urban area.'*
- 4.17 It may well be the case that the Council have decided that the educational needs of the area around Kirkliston outweigh the landscape harm clearly indicated in the Landscape Assessment. However, if this is the case, that decision needs to be formally documented and recorded somewhere within the evidence base and justified. However, there is no Education Impact Assessment supporting the City Plan or an existing educational needs survey provided. It is also prudent to point out that the Scottish Government recently declined the City Council's request to adopt statutory supplementary planning guidance on developer contributions, which included a large section on education contributions. As such, even if education needs were being used to override the conclusions of the Landscape Assessment, it is our strong view that insufficient justification has been provided to warrant such action at this stage.
-

---

## 5. CRITIQUE OF THE ENVIRONMENTAL REPORT

- 5.1 The City Plan 2030 Environmental Report was prepared by the Council’s Planning Policy Department to inform Choices for City Plan 2030, and states that it has been prepared in line with Section 15 of the Environmental Assessment (Scotland Act 2005).
- 5.2 This assesses sites against 28 individual criteria across 8 environmental topic areas listed below and as set out in more detail at **Appendix 1**.
- Biodiversity, Fauna and Flora;
  - Population and Human Health;
  - Soil;
  - Water;
  - Air and Climatic Factors;
  - Material Assets;
  - Cultural Heritage; and
  - Landscape and Townscape.

### **Issues with Methodology**

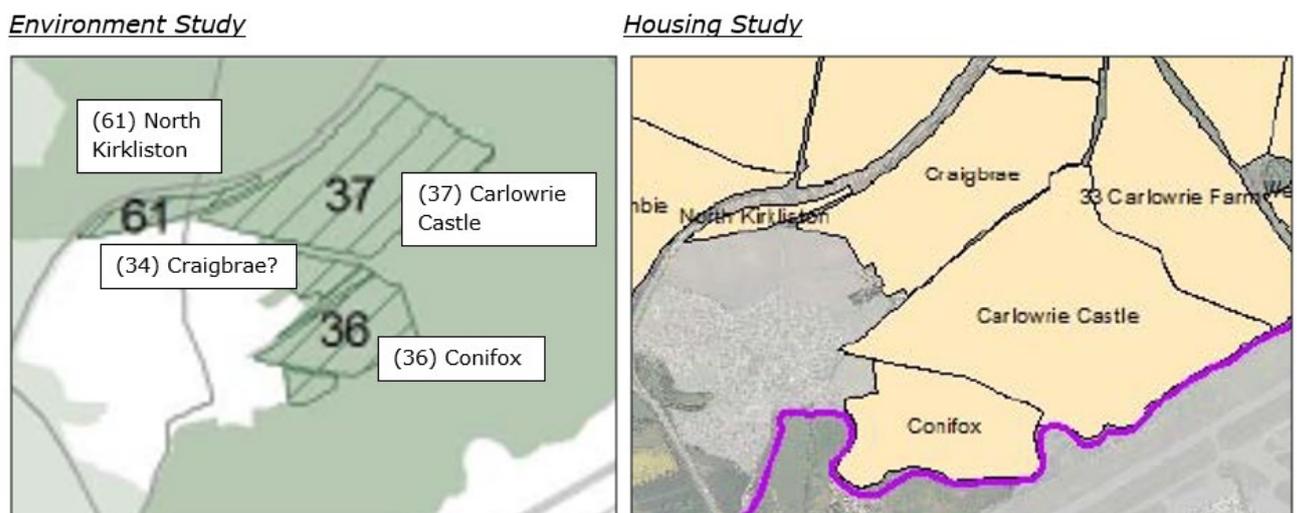
- 5.3 We do not dispute the criteria that are included, as they are all valid environmental considerations, although we would reiterate our comments from section 2 that this neglects other elements of sustainable development as defined by national planning policy (including accessibility & access to employment and education).
- 5.4 These other elements are considered separately in the Housing Study, which itself neglects important environmental considerations (such as ecological designations), an error compounded by the fact that the Environmental Report only considers those 5 Greenfield sites considered suitable for release within the Housing Study, and therefore fails to meet the SEA requirement to test reasonable alternatives.
- 5.5 This situation is further complicated by discrepancies between how sites are divided up/ labelled between the Environmental Report and Housing Study (and the Landscape Assessment as noted in section 4), which are said to both be based on land ownership boundaries, field boundaries or landscape features.
- 5.6 The Environmental Report assesses 13 greenfield parcels across 2 areas, including:
- 5 parcels that make up the South East Edinburgh allocation (No’s: 127, 11, 12, 16, 17) – see map on page 181; and

- 8 parcels that make up the 4 west Edinburgh allocations (No's: 4, 34, 36, 37, 42, 61, 82, 99) – see map on page 186.

5.7 However, the Greenfield Parcel Assessment in Part 2b of the Housing Study splits the City into 7 sectors and 134 sites with notable differences in the parcel boundaries and labelling, which don't match the proposed allocations/ sites actually being promoted.

5.8 This is most obvious in the case of Kirkliston as shown in Figure 5.1 below, where both the studies separate the site into 4 parcels. The parcels in the Environment Study accurately reflect the proposed allocation (albeit parcel 34 Craigbrae isn't actually labelled). However in the Housing Study, which is confirmed to be the critical document in the selection of this site, three of the four parcels (Conifox, Craigbrae and Carlowrie Castle) are larger than those proposed for allocation, whilst Craigbrae and Carlowrie Castle are labelled the opposite way round, adding to the confusion.

*Figure 5.1 – Discrepancies between sites in Environment and Housing Assessments*



5.9 This again makes comparative analysis across the evidence base difficult, and provides a further indication that the site selection process has not been robust (as discussed in section 2).

5.10 In addition to the issues above, we also disagree with a large number of the conclusions the Environmental Report reaches in relation to a number of the sites due to the inconsistent manner in which they have been assessed.

### **Comparative Environmental Assessment**

5.11 As such, we have carried out our own Environmental Assessment of the chosen sites in west Edinburgh (including the 4 greenfield sites and the brownfield site at Crosswinds). This assessment is provided at **Appendix 3**, and is summarised then compared with the Council's own assessment in the table below (Figure 5.3).

- 5.12 Within our own assessment, we also include the South of Riccarton site being promoted by Wallace as an example of a site that is not proposed for release (as we did in section 4).
- 5.13 The Council’s assessment does not provide a total score for each site, making direct comparison and overall ranking difficult. As such we have applied our own numerical scoring system as per below, which we then apply to the Council’s assessment and our own.

*Figure 5.2 – Pegasus Environmental Report Scoring*

Key of Council’s Assessment		Pegasus scoring:
A significant positive environmental effect	✓	2
A significant negative environmental effect	x	-1
Uncertain as to whether any significant positive or negative effects would be likely	?	0
Neutral or no significant effects likely	-	1

- 5.14 Where there are multiple parcels within the general allocation (i.e. Kirkliston and Calderwood), we provide a composite/average score for the parcels.
- 5.15 The criteria in the study generally consider the current position of sites in terms of their impacts and opportunities (i.e. without mitigation) although some also consider the potential opportunities for sites when developed, including P3 and L4 (relating to improvements to active travel, recreation and the green network respectively). However, the Council’s assessment doesn’t consider potential mitigation consistently, and overlooks opportunities on some of the sites listed above, which given their large scale would surely present opportunities to provide active travel infrastructure and open space in line with these criteria.

Figure 5.3 – Environmental Assessment Summary table (Council and Pegasus Site Assessments)

Site Name	Env. Code	Biodiversity					Population				Soil				Water				Air & Climate				Material Assets				Heritage				Landscape				Site Score	Collated Council	Collated Pegasus				
		B1	B2	B3	B4	B5	P1	P2	P3	P4	S1	S2	S3	S4	W1	W2	W3	W4	A1	A2	A3	A4	M1	M2	M3	M4	H1	H2	H3	H4	H5	H6	L1	L2				L3	L4		
South Riccarton	Council Pegasus	1	1	1	1	1	1	1	2	1	-1	-1	-1	-1	0	1	1	1	2	2	1	1	1	2	1	1	1	1	1	1	1	1	1	2	1	1	N/A	N/A	29	N/A	29
East of Riccarton	Council Pegasus	-	X	?	?	-	-	-	X	?	X	?	?	?	?	?	?	?	-	-	?	X	-	Y	?	?	X	X	?	-	-	X	-	-	?	-	?	?	7	7	7
Carlowrie Castle (Kirkliston)	Council Pegasus	-	X	?	?	-	-	-	X	?	X	?	?	?	?	?	?	?	X	X	?	X	-	-	?	?	X	X	?	-	-	X	-	X	-	-	-	-	4	4	4
Craigbrae (Kirkliston)	Council Pegasus	-	-	?	?	-	X	-	-	-	X	-	-	-	-	-	-	-	X	X	?	X	-	-	?	?	-	-	-	-	-	X	-	X	-	-	-	-	10	10	10
Conifox (Kirkliston)	Council Pegasus	-	-	?	?	-	-	-	-	?	X	?	?	?	?	?	?	?	X	X	?	X	-	-	?	?	-	-	-	-	-	X	-	-	-	-	-	-	13	13	13
North Kirkliston (Kirkliston)	Council Pegasus	-	-	-	-	-	-	-	?	-	X	X	X	X	-	-	-	-	X	X	?	X	-	-	?	?	-	-	-	-	-	X	-	-	-	-	-	-	12	12	12
Norton Park (West Edinburgh)	Council Pegasus	-	-	?	?	?	-	-	X	-	X	?	?	?	?	?	?	?	-	-	?	X	-	-	?	?	X	X	-	-	-	X	-	-	?	-	-	-	11	11	11
Overshiel (Calderwood)	Council Pegasus	-	?	?	?	-	-	-	-	-	X	?	?	?	-	-	-	-	X	X	?	X	-	-	?	?	-	-	-	-	-	X	-	-	-	-	-	-	9	9	9
Bonnington (Calderwood)	Council Pegasus	-	-	?	?	?	X	-	X	-	X	?	?	?	?	?	?	?	X	X	?	X	-	-	?	?	X	X	-	-	-	X	-	X	X	-	-	-	2	2	2
Crosswinds	Council Pegasus	-	?	-	-	-	-	-	-	?	Y	?	?	?	?	?	?	?	X	X	-	X	-	-	?	?	-	-	-	-	-	X	-	-	-	-	-	-	18	18	18
		1	1	1	1	1	-1	1	2	1	2	0	1	1	0	1	1	1	2	2	1	1	1	1	1	1	1	1	1	1	1	0	1	1	1	1	1	1	28	28	28
																										9.75	9.75	15.75													
																										11	11	18													
																										5.5	5.5	12													
																										18	18	28													

Council's Assessment	Pegasus scoring
Significant positive effect (Y)	Positive (2)
Significant negative effect (X)	Negative (-1)
Uncertain (?)	Unknown (0)
Neutral / No significant effect (-)	Neutral (1)

5.16 We summarise the key findings and differences below for each of the sites:

***South of Riccarton***

- 5.17 As mentioned, the site has been considered both on its current position and development potential, based on the masterplan and promotional material submitted to date. On this basis the site scores positively in creating opportunities for active travel and accessibility to public transport given the proximity to Curriehill train station and proposed transport hub (including a bus terminus and car park). It also offers opportunities for social interaction with direct connections to the adjacent university and the proposed Local Centre.
- 5.18 The site can also create defensible green belt boundaries with the Murray Burn / the settlement of Currie to the south and Heriot-Watt University to the east. To the north and west of the site there is existing woodland and roads that the site edge follows, which also act as strong defensible green belt boundaries. These create a logical extension to the existing settlement and an obvious allocation site. For the remainder of the questions the site was considered to be neutral due to the lack of environmental designations within the site and the opportunities for mitigation in respect of heritage, landscape, ecology and amenity issues.
- 5.19 This gives it an overall score of **29** (which we cannot compare with the Council as they did not assess this site, or any others that could be considered reasonable alternatives). This suggests that the site should be considered for allocation.

***East of Riccarton***

- 5.20 Our assessment scored this site far higher than the Council did (**27** compared to **7**). The Council only gave this site one positive score and this was based on the site being able to provide open space and recreation. However, our assessment also scored it positively on active travel as it is directly adjacent to the 754 National Cycle Route, and on public transport accessibility, given its proximity to Hermiston park and ride facility in particular and Wester Hailes train station.
- 5.21 In terms of Green Belt boundaries the site was scored neutrally by the Council. However, there are strong existing boundaries provided by the bypass to the north, and the existing built up area to the east and south. The Council scored the site as neutral for the effects on the designated landscape area, but our assessment scored this as negative as it lies adjacent to the Gogar Special Landscape Area. For the remainder of the questions the site scored neutrally or unknown.
- 5.22 As such, we conclude that this site scores similarly but slightly lower than South of Riccarton and should be considered for allocation as proposed.

***Kirkliston***

- 5.23 The site at Kirkliston is split into four parcels: Craigbrae (34), Conifox (36), Carlowrie Castle (37) and North Kirkliston (61). Both the Council and our analysis score North Kirkliston higher than the other parcels, mainly due to it being well contained by the M90 road and existing built up area,

whilst the others are more open. Again, our scoring is slightly higher as we have assessed the sites positively on their future potential (with a composite score of **15.75** compared to **9.75**). However, it remains one of the lowest ranking locations when we assess it against the various environmental criteria.

- 5.24 The sites overall do not score positively. Indeed, they have only gained a positive score based upon their ability to provide open space and the defensible Green Belt boundaries of the northern section as noted. Some of the parcels contain Local Biodiversity Sites within them and have therefore been scored negatively on this basis. A major issue is proximity to active travel, this is reflected in all the parcels scoring negatively for Question P3 regarding opportunities for active travel. The site is very isolated and cannot be connected to the wider area through cycle routes. This is the same for public transport where all of the parcels score negatively due to the site having a lack of public transport other than a bus that does not run frequently. The site relies on car use due to the lack of sufficient public transport, lack of amenities and no connection to the cycle route.
- 5.25 Our assessment scored fewer negatives than the Council, for example the Council score sites negatively for not being brownfield land however we have rated the site as neutral, given the Council accept that there is unlikely to be sufficient brownfield capacity to meet all their housing needs. The Council also rate the site as negative for flood risk and state that Carlowrie Castle is located in a flood risk area, however none of these parcels are located in a high-risk flood zone.
- 5.26 Overall, the Kirkliston site scores a much lower composite score compared to South of Riccarton, East of Riccarton, West Edinburgh and Crosswinds. This is principally due to its poor public transport accessibility and suggests this should not be considered for allocation.

### ***West Edinburgh***

- 5.27 This site is referred to as Norton Park (4) in the Environmental Report and is mainly rated neutral in our assessment, with few positives. This achieved a score of **11** in the Council's assessment and **18** in ours.
- 5.28 The differences are mainly where the Council gave negative scores, such as on the active travel question, despite the study stating that the National Cycle Network is adjacent to the site. There was also some discrepancy over flood risk (criteria A4) where the Council gave this a negative score, however, we rated this as neutral. This was on the grounds that the site was not located within a flood risk area and flooding and instability could be mitigated through design. Flood risk was also scored differently between our assessment and the Council's for criteria W2 'flood storage capacity'. The SEPA flood risk map shows that part of the site is at risk of surface water flooding, but this is minimal and can likely be mitigated through development.
- 5.29 The site scores above the lower scoring sites such as Kirkliston and Calderwood but it is still lower than South of Riccarton, East of Riccarton and Crosswinds, which raises concerns over its environmental impact and justification as a proposed greenfield release.

---

### ***Calderwood***

- 5.30 The site at Calderwood is covered by parcels Overshiel (99) and part of Bonnington (82) in the Environmental Report. Neither the Council assessment or our assessment score any of the questions positively. Their assessment has slightly fewer negatives than ours and more unknowns, however we identify more neutrals which increases the overall scoring. This is based on a positive assessment of the potential opportunities that the site's development will generate.
- 5.31 The Council score the site as negative for preventing the increase of flooding and instability, but despite parts of the site being susceptible to surface water flooding it could be mitigated through the design. Again, the Council rate greenfield sites as negative for the question in relation to a brownfield location but our scoring rates this neutrally. Having said that, our assessment does not find any merits in the site and along with the Councils scoring it represents the lowest scoring of the chosen greenfield sites.
- 5.32 The site has some negatives around biodiversity with an ancient woodland being within both parcels, but the main areas where the site scores negatively relate to its remote location. For example, the site scores poorly in relation to active travel and proximity to public transport due to there being no local facilities within the area. The site relies heavily on car borne transport as the bus service is infrequent and over a 15 minute walk from the site. Furthermore, there are no clear and defensible Green Belt boundaries for either of the parcels, nor does the site act as a logical settlement extension as it is not connected to any genuine settlement and is simply an extension to an isolated rural development.
- 5.33 It is apparent that both our assessment, which results in a score of **12**, and the Council's assessment, which results in a score of **5.5** both confirm the Calderwood site is the lowest scoring / least sustainable of the proposed allocations. On this basis, we consider it should be removed and replaced with a more sustainable alternative i.e. land South of Riccarton.

### ***Crosswinds***

- 5.34 This site is scored highly by both our assessment and the Council's. Our assessment scored the site positive on 3 additional questions to the Council's. We scored the site positively on the access to public transport due to its location to Edinburgh Airport which has a tram and train station. Interestingly, the Council scored the site negatively on this point and neutral in terms of active travel, despite there being a cycle route adjacent to the site.
- 5.35 The Council scored the site as negative for having a significant effect on the landscape setting of the city. We scored this as neutral due to its relatively urban location adjacent to the airport and employment sites that are more likely to have larger effects on the landscape.
- 5.36 Most notably, the Council score the site neutral on criteria P1 which covers air quality and noise issues, for this we suggest the site must be scored negatively due to it being directly adjacent to the airport runway/ flight path, which will generate major amenity issues for any future residents.

In fact, other airports in the UK, including Manchester, have brought in increasing restrictions on development around airport flight paths for this very reason, with latest noise data highlighting every increasing impacts. For the remaining criteria this site scores as neutral.

5.37 Our assessment scores the site with **28** points, whereas the Council's results in **18** points.

### **Conclusions**

5.38 Overall, both the Council's and our own assessment show significant variations in the scoring of the chosen sites, with the Council ranging from **5.5** to **18** and our assessment from **12** to **29**. A number of the differences relate to how we have assumed certain sites could mitigate certain impacts, hence why our scores are typically higher than the Council's. Nonetheless, there is consistency between the two assessments when considering which sites fair better when tested against the various environmental criteria.

5.39 Our assessment clearly demonstrates that the South of Riccarton site scores highly, along with the East of Riccarton and Crosswinds site. In fact, it scores highest out of all the sites assessed. The Kirkliston and West Edinburgh sites achieve middling scores, whilst the Calderwood site scores lowly in both ours and the Council's assessment.

5.40 At the very least, what this exercise demonstrates is that the South of Riccarton site must be considered as a reasonable alternative as part of the Council's SEA obligations when preparing the Local Development Plan. However, it is our strong view that based on a robust assessment of environmental criteria (both in terms of existing and potential opportunities), the South of Riccarton site should be selected for allocation and the West Edinburgh, Calderwood and Kirkliston sites omitted.

5.41 Therefore, in response to Question 12B on the consultation hub regarding greenfield sites, Wallace in principle objects to the Calderwood, Kirkliston, West Edinburgh and East of Riccarton sites due to an incomplete and inconsistent evidence base for the west Edinburgh area.

5.42 However, we strongly object on environmental grounds to the West Edinburgh, Kirkliston and Calderwood sites being proposed and object to the fact that South of Riccarton has not been identified as a proposed greenfield release site given that it scores the highest of all proposed sites in west Edinburgh.

---

## 6. CRITIQUE OF THE HOUSING STUDY

- 6.1 The Housing Study is in 2 parts, with part 2b assessing all the greenfield land in the district, split into 7 sectors and 134 sites.
- 6.2 This assesses sites against 13 individual criteria across 6 sustainability topic areas listed below (as set out at **Appendix 1**) and an overall summary of whether the site is 'suitable for development':
- Active Travel;
  - Public Transport;
  - Community Infrastructure;
  - Landscape Character;
  - Green Network; and
  - Flood Risk.
- 6.3 This is confirmed to be the key evidence base document that has informed the selection of the greenfield sites in the Plan, with these selected sites then tested further in the Environmental Report.
- 6.4 However, there are several methodological issues with the Housing Study, many of which are highlighted in previous sections. These include the lack of clarity of how sites have been identified, and the fact that they don't correlate with actual promoted sites or the other evidence base documents, both in terms of their boundaries and categorisations. This is compounded by the fact that the Council haven't officially done a call for sites, so there is no formal record of what is being promoted. This lack of clarity is unacceptable given the importance of this document in informing site selection.
- 6.5 We have also noted that the Housing Study omits a number important environmental criteria, including proximity to statutory environmental designations (which are covered in the later stage Environmental Report but only for selected sites), and as such cannot be considered a robust assessment in line with SEA requirements.
- 6.6 Furthermore, the criteria that are included do not properly assess site deliverability in terms of the existing capacity in local services, roads and public transport. Nor do they consider marketability and local market conditions. As such the assessment is too vague and does not provide a robust assessment of deliverability.
- 6.7 In addition, there are also discrepancies with how different sites have been assessed within the document.

- 6.8 Firstly, there is a level of overlap in criteria between Environmental Report and Housing Study, yet different conclusions are drawn for the same sites across the two studies, suggesting these have not been coordinated. For example flood risk is covered in both studies (in the Flood Risk section of the Housing Study and criteria W1 and W2 in the water section of the Environmental Report) yet draws different conclusions for several sites, including Kirkliston where both parcels score positively in the Housing Study, yet both score neutrally in the Environment Study even though flooding concerns are raised.
- 6.9 Secondly, as with the Environmental Report, some sites are assessed on the basis of their current position (without mitigation), whilst others are assessed on their future potential (with mitigation), which skews the results. Other scores are insufficiently justified or vague.
- 6.10 It is our strong view that given the large strategic nature of these sites, they must be considered on the basis of their future potential with mitigation, based both on the perceived opportunities in the site and the promotional and Masterplanning material submitted to date. By their very nature large greenfield sites are often in more peripheral locations and would be expected to provide their own infrastructure and services, helping them achieve positive sustainability scores.
- 6.11 The two elements that seem to generate the most discrepancies in the scoring are education and public transport/ accessibility.

### **Education**

- 6.12 In respect of education paragraphs 5.12 and 5.13 of the Housing Study note the following:
- "The five potential greenfield allocation areas identified in Choice 12 have been assessed on a stand-alone basis for their education infrastructure requirement. Each of the proposed Place Briefs within Choices for City Plan 2030 sets out the education infrastructure required based on 65 dwellings per hectare and an 80/20 house/flat split.*
- In line with an 'infrastructure-first' approach to the growth of the city, some of the potential development areas could support current Council priorities for the delivery of new infrastructure, these are Kirkliston and East of Riccarton."*
- 6.13 We take issue with the manner in which the Council have seemingly applied the principles of an 'infrastructure first' approach. Rather than undertake and publish a full assessment of where existing capacity lies within existing schools (either by virtue of space within existing classrooms or through the scope to extend existing schools on Council owned land or available neighbouring land), the Council have seemingly identified large development sites that they believe can deliver brand new schools. The latter may be a perfectly acceptable and warranted approach, but most large, strategic sites of a sufficient scale could deliver new schools. However, the evidence base is incomplete to determine if it is the most sustainable approach.
- 6.14 Indeed, if there is enough capacity in existing locations, it may prove more sustainable to utilise that available capacity in the first instance. If there is no existing capacity available and the only

option is to provide new facilities, determining which sites are best placed to provide this new educational infrastructure should be influenced by a range of sustainability criteria (including proximity to public transport provision, environmental considerations, etc). That approach does not appear to have been followed. Instead, the location for the new education facility seems to have been one of the key starting points and once that decision has been made it obviates an objective assessment of all other potential site options.

- 6.15 As previously noted, the Council’s approach to calculating education need and contributions proposed within their ‘Supplementary Guidance on Developer Contributions and Infrastructure Delivery’ was also rejected by the Scottish Government on 29<sup>th</sup> January 2019 (see **Appendix 4**), with the reporter concluding at paragraph 5.4:

*"In summary, in my view neither the supplementary guidance or the appraisal provide the kind of detailed evidence for the approach to cumulative education contributions which I would expect interested developers and landowners would wish to examine, or to allow full scrutiny of the approach to the calculations. This applies in relation to identifying the contribution to school capacity issues from new development and then justifying the approach to be taken in each contribution zone."*

- 6.16 This completely undermines the Council’s approach to education need, particularly the justification for a new secondary school at Kirkliston, and the capacity issues at Currie High School which are considered to make the South of Riccarton site undevelopable (with the study concluding ‘*There is not enough scope for development on this and nearby sites to support this level of intervention*’).
- 6.17 Furthermore, as noted in section 2, the potential for improving education infrastructure in the Housing Study is inconsistently applied, with the East of Riccarton site given a ‘partial’ score whilst South of Riccarton gets a no score despite the fact that Wallace has confirmed the development is of a scale that would be capable of delivering new education provision, and have included a primary school in their proposals. The Council’s Assessment of the South of Riccarton site goes even further and states that it may have capacity to deliver a new school were it not for the East of Riccarton site taking up the capacity. Again, this demonstrates that each individual site has not been assessed objectively or independently, with a strong element of pre-determination.
- 6.18 It is also pertinent that Heriot-Watt University is not considered to be an employment cluster for the purposes of the Housing Study, which affects the accessibility scores of the Riccarton sites, yet there is 1,916 Staff on the Scottish Campus in April 2019 (see page 7 of attached at **Appendix 5**) so it is clearly a major employer with the potential for significant further growth with the linkages, infrastructure improvements, and population growth proposed by the South and East of Riccarton sites.

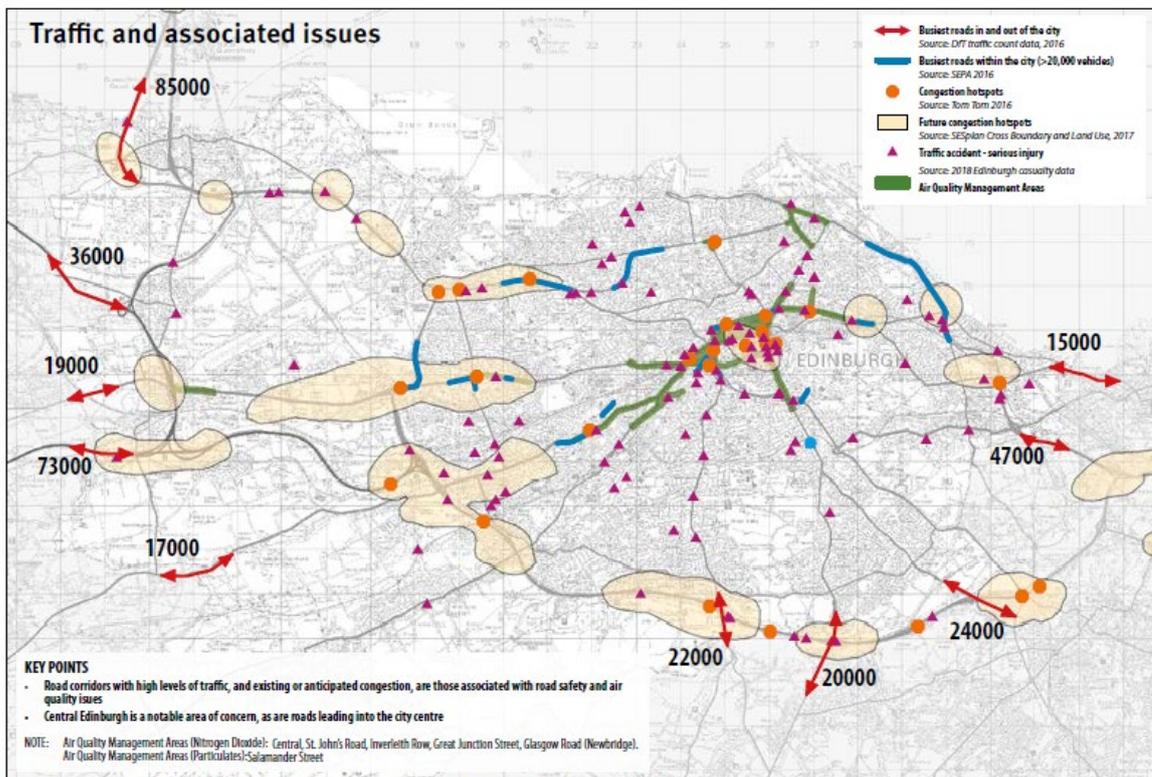
### **Public Transport / Accessibility**

- 6.19 Notwithstanding the discrepancies raised in section 3 with the Jacobs Edinburgh Strategic Sustainable Transport Assessment (ESSTS), the most obvious point to note is that some of the

greenfield sites that have been selected simply don't support the key Local Development Plan objective of reducing the reliance on the private car and Edinburgh City Council's objective to be a carbon neutral City by 2030 (as confirmed in the City Mobility Plan – Case for Change P3). Most notably, the sites at Kirkliston and Calderwood are not on the rail or tram network and do not sit within a sustainable transport corridor as identified by the ESSTS. Whilst there are future plans for a rail link to Kirkliston, known as the 'Almond Chord', this has been in the pipeline for years but is at a preliminary stage. What's worse is that both of these locations for development will inevitably increase commuter traffic travelling into the City Centre from the west, where the existing network is already under stress, particularly the Newbridge Roundabout. As such, neither of these sites should be within the City Choices Plan.

6.20 In terms of existing road capacity around the West Edinburgh site, the ESSTS states (at page 75), that the A8 Glasgow Road that fronts the site is "among the more direct and less congested radial corridors", which has clearly factored into its accessibility scores in the Housing Study; however we would disagree with this, as it underplays the extent of existing congestion on this route at peak times, which affects the operation of the Newbridge Roundabout and the Gogar roundabout. This is illustrated by the plan on page 6 of the City Mobility Plan shown at figure 6.1 below which shows that there is a convergence/ funnelling of traffic coming from the west towards the A8 Glasgow Road. This must therefore include a proportion of the traffic coming from those other routes (so some of the 36,000 from the M9 and 73,000 from the M8) on top of the 19,000 directly attributed to the A89/ A8 route.

Figure 6.1 – Existing Traffic Flows (Page 6 of City Mobility Plan)



Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown Copyright and database rights 2019. All rights reserved. Ordnance Survey Licence Number: 100023430.

- 6.21 In addition, the West Edinburgh site scores positively on the basis of potential tram extension, yet the feasibility for this has not been evidenced, and pedestrian linkages to the existing tram stop are poor (involve crossing a dual carriageway and through an underpass).
- 6.22 Yet the South of Riccarton site scores poorly on active travel and accessibility even though it is within a Transport corridor and directly adjacent to a train station, with a public transport hub (train and bus interchange, and park and ride proposed within the development. The development could provide the demand to support Bus Rapid Transit between the Transport Hub and the city centre. The Study notes that transport interchanges are important but simply don't justify their weighting in the evidence.

**Comparative Housing/ Sustainability Study**

- 6.23 We have carried out our own Housing/ Sustainability Study of the chosen sites in west Edinburgh (including the 4 greenfield sites and the brownfield site at Crosswinds). This assessment is provided at **Appendix 6** and is summarised then compared with the Council's own assessment in the table below (Figures 6.3).
- 6.24 As with previous sections, we include the South of Riccarton site being promoted by Wallace as an example of an alternative site that is not proposed for release. We also provide our own scoring system again for comparative purposes as the Council's assessment does not provide a total score for each site.
- 6.25 The proforma scoring system has three options to the answers: Yes, Partially and No. For a site to be classed as partially it states that a suitable intervention (i.e. mitigation) must be in place. Looking into what these interventions actually are to class it as 'partially' could help identify what interventions are actually needed.

Where there are multiple parcels within the general allocation (i.e. Kirkliston and Calderwood), we provide a composite/average score for the relevant parcels, as we did in section 5.

*Figure 6.2 – Pegasus Housing Study Scoring*

Key of Council's Assessment	Pegasus scoring:
Yes	2
Partial	1
No	-1
Unknown	0



6.26 We summarise the key findings and differences below for each of the sites:

***South of Riccarton***

- 6.27 The Council's Housing Study scored South of Riccarton lowest of the six sites considered here, is with Kirkliston being the next lowest, whereas our assessment scores South of Riccarton highest with East of Riccarton just behind.
- 6.28 In the Council's assessment the site scores mainly negatively with some neutral, whereas our scoring is mainly neutral and positive with no negatives or unknowns. The Council scored the sites active travel provision negatively based on the fact that the site is not in walking distance to convenience stores and employment and lacks access to wider cycle network, however this is something we disagree with, given the proposed local centre in the development, footpath and cycle linkages, and the fact that Heriot-Watt is a major employer (as well as a Higher Education facility). The Council also scores the site negatively on public transport despite there being a train station immediately adjacent to the site and community infrastructure, again this is something we disagree with and score positively. There is also a bus service within the area that has regular and multiple routes across the local area.
- 6.29 Furthermore, in terms of existing road capacity, which this study fails to assess, the plan at Figure 6.1 (from page 6 of the CMP) shows that this is the least congested corridor in west Edinburgh (and certainly far less congested than the A8 Glasgow Road Corridor around the West Edinburgh site).
- 6.30 As well as the site being able to provide local amenities, there are employment links and shopping areas in Sighthill that can be easily accessed from the site either by existing bus and train routes or via new improved connections to the existing cycle route. In turn, this will reduce car trips.
- 6.31 There is also education provision in Currie which the Council's assessment does not take into account and is not clear on what is meant by infrastructure capacity. In light of this the Council's assessment score totals **-5** due to the number of negatives compared to our scoring which totals **17**.
- 6.32 This strongly suggests that this site should be allocated.

***East of Riccarton***

- 6.33 The scoring for this site was mainly negative and neutral with one positive, with the positive being for the landscape character of the site to prevent coalescence of settlements. We agreed with this to some extent but development on the site would join Riccarton to Wester Hailes so our assessment scored this as 'partial'. Our assessment mainly scored the site as positive and neutral and it outscored South of Riccarton in terms of its proximity to convenience services within walking distance.

6.34 The site scored very similar to South of Riccarton (with the Council’s score totalling **0** and our score totalling **16**), so based on the criteria in this assessment we conclude that this site should be considered for allocation as proposed.

### ***Kirkliston***

6.35 The site at Kirkliston is split into four parcels, albeit the majority of the allocation falls within two – ‘Craigbrae’ and ‘North Kirkliston’ so we have only considered these here (as the other two parcels are much larger and the findings will therefore not be representative of the small parts in the allocation. This differs from the Environmental Report where the four parcels accurately reflect the allocation). This site is scored the second lowest in the Council’s Housing Study (with a composite score of **-4**) and within our assessment (with a composite score of **-1.5**). The site mainly scored neutral in the Council’s assessment, with positives in relation to flood risk, walking distance to convenience stores, access to education and access to the green network.

6.36 We dispute the scoring on access to convenience stores, as the nearest convenience store is a 15 minute walk from the site and therefore does not meet the Council’s criteria of a 10 minute walk time, and is only a very modest convenience offering. We also dispute the findings on access to education in line with our general comments above.

6.37 We agree with the Council that score the site negatively in terms of public transport provision due to the lack of train station and relatively poor bus service (6 regular services through the settlement), particularly when compared to Riccarton (11 regular services).

6.38 There are very few public amenities in Kirkliston in terms of employment, shops or schools. In terms of food shopping there is a small Scotmid Co-op within the town, but no major supermarket, and given the limited active travel links this ensures that residents will already be reliant on their cars for main food shopping. Further development here will undoubtedly increase car borne trips further and put more pressure on the crossroads within the centre of Kirkliston which already experiences considerable congestion issues at peak times, and has no scope for improvement or reconfiguration due to existing built form.

6.39 Therefore, based on our assessment the site is unsustainable and should not be considered for allocation.

### ***West Edinburgh***

6.40 The site achieves a score of **9** in the Council’s assessment and **15** in our assessment so we broadly agree with the Council’s scoring on this site.

6.41 The differences were mainly due to the Council scoring the site negatively on the public transport provision despite the site being a ten minute walk from Ingliston Park and Ride. We agree the walk may not be pleasant for people as it requires going under the dual carriageway and crossing a busy roundabout but there is a bus stop on Glasgow Road which has frequent services to a variety of

places in the local area. The site is also scored negatively due to the lack of primary school, however there is a primary school (Hillwood) a 20 minute walk from the site.

- 6.42 The site scores third in our assessment behind East of Riccarton and South of Riccarton, suggesting it is potentially suitable for allocation if suitable mitigation is proven to make the site sustainable.
- 6.43 That said, in wider policy terms, the site is located within the defined boundary of national development 'Strategic Airport Enhancements', as set out section 10 of Annex A of Scotland's Third National Planning Framework (NPF3 – June 2014); which covers Edinburgh Airport, along with Glasgow Prestwick, Glasgow International, Aberdeen and Inverness, and adjoining land. A map showing sites within this national designation is provided on Figure 6.4 over the page for clarity.
- 6.44 This site is currently identified as the location for the relocated National Showground with no provision for residential uses. Therefore, as things stand, housing on this site would directly conflict with national policy. In principle, Wallace object to this proposed greenfield area for housing and it cannot be considered as suitable or deliverable unless NPF is revised to establish such uses as appropriate under 'Strategic Airport Enhancements' or amends its boundary to exclude this site.

### ***Calderwood***

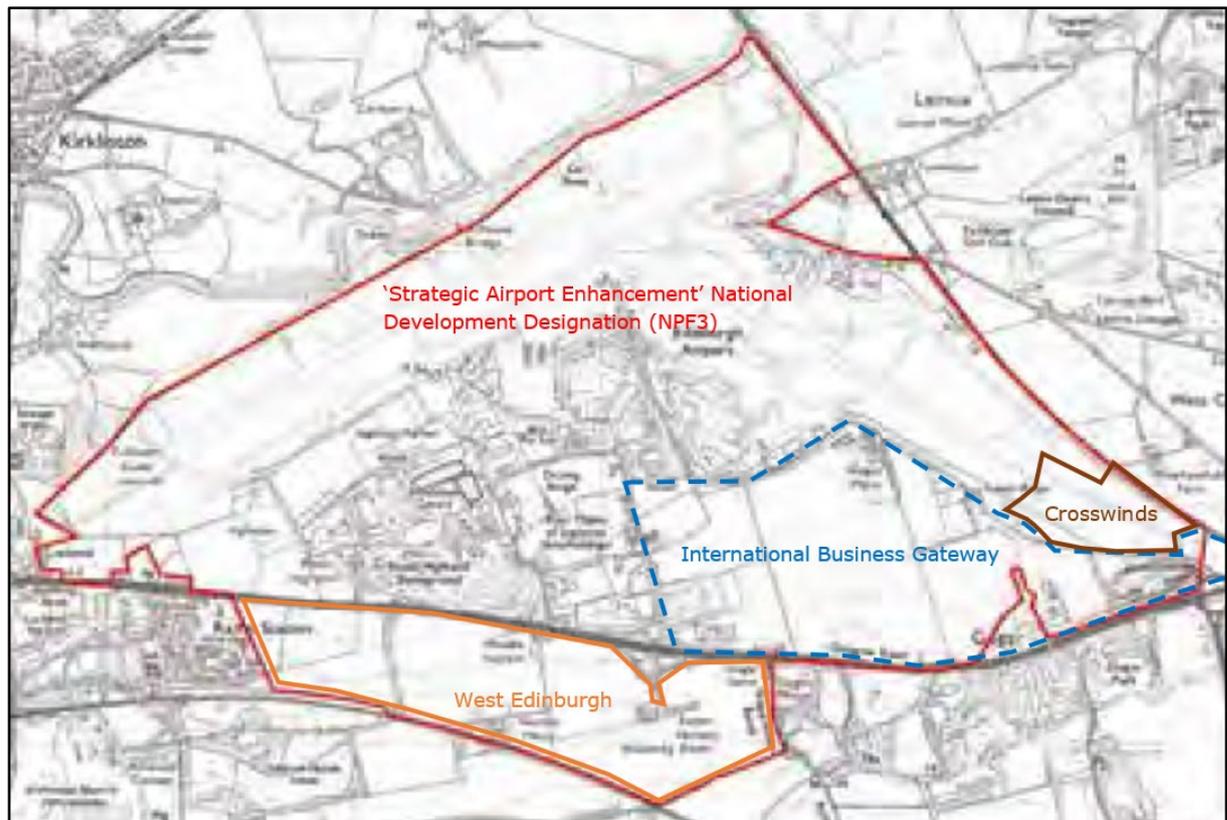
- 6.45 The site at Calderwood is covered by parcels Overshiel and partially by Bonnington in the Housing Study. The Council score some of the aspects positively such as flood risk and access to convenience stores (from Overshiel). We query the positive scoring on Flood Risk and rank this neutrally, due to parts of the site showing some risk of flooding. In terms of walking distance to convenience stores, we disagree with this as currently there are no facilities in close proximity to the site and the Council scores this question based upon the masterplan for the adjacent development. The Council do not comment on the education provision due to the catchment being within West Lothian, however our assessment picks up on the fact that there are no educational facilities in close proximity to the site, with no robust evidence for future provision, so we score this negatively.
- 6.46 The site scores particularly poorly in respect of public transport accessibility, as there is no train or tram station and a very limited bus service (comprising a single service from the B7015, the X27, which is very slow during peak hours due to the lack of a bus lane into the City on the A71). Again, development here will undoubtedly increase car journeys and traffic on the A71 into Edinburgh, in direct conflict with the City Mobility Plan.
- 6.47 Other than this, the Council's assessment is broadly in line with our assessment producing a combined score of **-6** which is far and away the lowest scoring site (indeed it is the only minus score in our assessment). The Council's provides a composite score of **-2.5** which makes it their third lowest ranked site. Accordingly, based on our assessment the site is highly unsustainable and should not be considered for allocation.

---

### **Crosswinds**

- 6.48 Crosswinds is assessed in the Council’s Housing Study with other brownfield sites. The assessment criteria is slightly different to the greenfield housing sites and does not assess the site on landscape character nor regarding the green network. The Council’s assessment scores the site at **9** but we note that the Council’s assessment does not confirm the site is within an SDA, when it is. It is also pertinent that the Council’s summary only scores it yellow/ partially suitable for development, where the other chosen sites score green/ suitable for development. Our assessment scoring stands at **11** which is below South of Riccarton, East of Riccarton and West Edinburgh, but above Kirkliston and Calderwood.
- 6.49 Overall the site scored mainly positive and neutral but there were a few questions where the site scored negatively. This was due to the site being located 15-20 minutes’ walk from a convenience store and other shopping facilities based upon the Council’s criteria, contrary to this the Council’s assessment scored the site positively on this. The site also scored negatively in both our assessment and the Council’s as the nearest primary school and secondary school are over a 30 minute walk from the site.
- 6.50 Notwithstanding these scores, in wider policy terms, as with West Edinburgh, the site falls within the defined boundary of the ‘Strategic Airport Enhancements’ national development (Section 10, Annex A of NPF3), as shown on figure 6.4 below, and described at page 13 of NPF3:
- "West Edinburgh is a significant location for investment, with the airport, the National Showground and the International Business Gateway. Development here will require continued co-ordination and planning to achieve a successful business-led city extension which fulfils its potential for international investment, new jobs and high quality place."*
- 6.51 This makes it clear that this is intended to be a business led, employment generating area, with no specific provision for housing. The national policy direction would therefore need to be changed before residential allocations could even be considered within this area.

*Figure 6.4 – Map of sites and designations at Edinburgh Airport*



6.52 Both Edinburgh Airport<sup>5</sup> and British Airways<sup>6</sup> made strong objections to proposals for housing at the adjacent International Business Gateway site in the last Edinburgh LDP review (between 2014 and 2015). In addition to questioning the principle of development based on NPF3, they also stated that siting housing so close to the airport would generate noise issues and other conflicts which could then impact on the future operation of the airport, as summarised by Holder Planning in their conclusion (para 5.3):

*"Edinburgh Airport has serious concerns that the proposed reconfiguration of the IBG to accommodate a significant component of residential use will prejudice the operation of the Airport, particularly in respect to potential traffic implications and potential conflict arising from airport activities and residential amenity, particularly noise impact."*

6.53 These points of objection are equally applicable to other sites in close proximity to the airport, notably Crosswinds which is basically a subsidiary of the airport, and West Edinburgh which is within the 'Strategic Airport Enhancements' area.

<sup>5</sup> Submitted through Holder Planning – 'Edinburgh LDP Examination - Further Information Request 22 & 23 - International Business Gateway Submission on Behalf of Edinburgh Airport' (January 2015).

<sup>6</sup> Submitted through Lichfields – 'Edinburgh Local Development Plan – Second Proposed Plan - Representation Form' (October 2014).

- 
- 6.54 In principle, Wallace object to this proposed area for housing and it cannot be considered as suitable or deliverable unless NPF considers such use to be appropriate in the 'Strategic Airport Enhancements' development area or amends its boundary to exclude this site.

**Conclusions**

- 6.55 Overall, both the Council's and our own assessment show significant variations in the scoring of the chosen sites, with the Council ranging from **-5** to **9** and our assessment from **-6** to **17**.
- 6.56 Our assessment clearly demonstrates that the South of Riccarton site scores highly, along with the East of Riccarton site; in fact it scores highest out of all the sites assessed. The West Edinburgh and Crosswinds sites achieve middling scores, whilst the Calderwood and Kirkliston sites scores lowly in both ours and the Council's assessment.
- 6.57 As such it is our view that based on a robust assessment of general sustainability and accessibility criteria (both in terms of existing and potential opportunities) the South of Riccarton site should be allocated; whilst the Calderwood and Kirkliston sites should definitely be removed. In addition, the national policy status of the land around Edinburgh Airport would need to be changed before the West Edinburgh and Crosswinds sites can be considered suitable or deliverable for housing use.
- 6.58 Therefore, in respect of Question 12B, Wallace strongly objects to the proposed sites of Kirkliston, Calderwood, West Edinburgh and Crosswinds being chosen, and to the South of Riccarton site being omitted as it scores highest out of all the west Edinburgh sites.

---

## 7. CONCLUSIONS

7.1 This representation has undertaken a detailed review of the Edinburgh Choices for City Plan 2030 and its supporting evidence base and identified a number of major flaws and inconsistencies in the site selection process, focusing on housing release in west Edinburgh, which can be summarised as follows:

- The Environmental evidence fails to meet the Strategic Environmental Assessment requirement to consider reasonable alternatives.
- Outright errors in the evidence (including an incorrect boundary of transport corridor 8 West of Hermiston, thus missing Curriehill train station; and a lack of an Education Impact Assessment to properly assess education requirements).
- An inconsistent approach to the parcelisation and labelling of sites across the different evidence base documents, which makes overall assessment and comparison of sites extremely difficult.
- Inconsistent assessment of sites in terms of mitigation opportunities, with some assessed on their existing situation, with others on their future potential, which skews the scoring.
- A general lack of clarity and consistency in the individual criteria assessments within the housing and environmental report.
- A Landscape Assessment that suggests that two of the proposed greenfield allocations (Kirkliston & Calderwood) are undevelopable on landscape grounds.
- Two of the Council's Preferred greenfield sites (Kirkliston & Calderwood) are not located within any sustainable transport corridor, and do not comply with the Council's Zero Carbon agenda and City Mobility Plan objectives.
- Two of the Council's Preferred sites (Crosswinds & West Edinburgh) are located within NPF3's 'Strategic Airport Enhancements' area, which does not make provision for housing, and would therefore require a change in national policy direction before they could even be considered as potentially suitable or deliverable for housing use.

7.2 To address these issues we have provided our own assessments (in sections 5 and 6) based on the criteria in the Council's Environmental Report and Housing Study. These compare the chosen sites in west Edinburgh (including the 4 greenfield sites and the brownfield site at Crosswinds), as well as the South of Riccarton site being promoted by Wallace, which we consider to be the highest scoring site in west Edinburgh, thus meriting the support of the Council as a greenfield release site or at the very least being identified as a reasonable alternative.

7.3 This assessment concludes the following:

- The South of Riccarton site scores the highest in both the environmental and housing study scoring exercises. This is due to its location within a sustainable transport corridor (8- 'West

of Hermiston') benefiting from active travel connections, 11 existing bus services and a half hourly train service (via Curriehill train station) in the peak hours, direct access to employment opportunities at Heriot-Watt (economic growth hub), potential for education and service improvements (new Riccarton Village centre), relatively limited landscape impacts (capacity for development – Council CAA 45) and other environmental constraints. On this basis, South of Riccarton should be the Council's first preferred choice for greenfield development in west Edinburgh and is closely followed by the East of Riccarton site.

- The West Edinburgh site has good accessibility to employment opportunities at the airport and the tram to the City Centre, albeit pedestrian and cycle permeability isn't great, nor is access to existing educational or community services. However, the site's low environmental score in comparison to South of Riccarton, East of Riccarton and Crosswinds suggests that this site has a greater environmental impact. Fundamentally however, in policy terms, bringing forward housing on this site would directly conflict with NPF3. Wallace therefore objects to the West Edinburgh site's potential allocation.
- Crosswinds is a logical release in some respects given it has strong boundaries, brownfield land with strong transport links, however its proximity to the airport will generate significant noise and air quality issues, and it also occupies an elevated position meaning it could have landscape impacts. Fundamentally however, bringing forward housing on this site would also directly conflict with NPF3. Wallace therefore objects to Crosswind's potential allocation.
- The Kirkliston and Calderwood sites are not located in a sustainable transport corridor as identified by the ESSTS. Both are isolated from public transport options and would therefore be over reliant on car borne transport, putting additional pressure on the local network west of Edinburgh which is already under stress (most notably at the Newbridge roundabout). Significant landscape issues have also been raised in the Council's own evidence, and flood risk issues are also identified. There are also potential deliverability and market saturation issues in these locations given that Kirkliston has recently been substantially expanded and Calderwood in West Lothian is still under construction. All the evidence suggests these potential greenfield sites are not suitable or sustainable. Wallace objects to the potential allocations at Kirkliston and Calderwood.

7.4 Notwithstanding the above, the evidence base for site selection in the west Edinburgh area overall is incomplete and flawed and as a result, Wallace objects in principle to any site allocations in west Edinburgh at the present time. As such we would ask that the evidence base and approach to site selection is reconsidered before the next stage of the Local Development Plan to ensure it is robust and in line with the relevant environmental guidance and national policy.

7.5 We would also respectfully request that the South of Riccarton site is considered for release as this representation has demonstrated that it scores the highest when compared against the sites preferred by the Council. South of Riccarton is already an accessible and sustainable site (within

---

sustainable transport corridor 8 – ‘West of Hermiston’ in the ESSTS) with significant opportunities for infrastructure improvements that are deliverable within the plan period. These representations should be read in conjunction with the further representations submitted on South of Riccarton by Geddes Consulting on behalf of Wallace.

---

**APPENDIX 1 – COMPARATIVE PROFORMA ASSESSMENT QUESTIONS**

**APPENDIX 1 - COMPARATIVE ASSESSMENT OF CRITERIA IN THE HOUSING STUDY AND THE ENVIRONMENT ASSESSMENT**

Housing Study January 2020	Assessment Criteria Key Features
<b>SDP1 SDA Areas</b>	
Does the site fit within an area identified as a strategic development area?	Assessed as being within an area identified in SDP1 as being within an area identified as a Strategic Development Area. SDP1 directs local authorities to identify the broad location of any additional sites that are required up to 2030 within these areas
<b>Active Travel</b>	
Does the site support travel by foot to identified convenience services? If not, can foot access be improved or services provided within walking distance through an appropriate intervention which is deliverable in the plan period?	Walking time to convenience stores. Sites within walking distance to support non-car travel. 10 minute walk time - 800m distance taking physical barriers and social barriers into account e.g. street lighting  <i>"If the site is within walking distance of grocery shopping and existing and committed employment clusters it will be classed as yes. If the site is not within walking distance of these but access can be improved or shopping can be provided within walking distance through a suitable intervention it will be classed as partially suitable. If neither of these conditions are met the site will be classed as no."</i>
Does the site support travel by foot to identified employment clusters? If not, can foot access be improved or employment provided within walking distance through an appropriate intervention which is deliverable in the plan period?	Assessed by walking time to existing and committed employment clusters 30 minute walk time to employment <i>"If the site is not within walking distance but can be improved by suitable intervention it will be classed as partially"</i>
Does the site have access to the wider cycle network? If not, is the site potentially served by an identified cycle route intervention project which is deliverable in the plan period?	Proximity to Quiet Route and NCN or the sites potential connection
Does the site support active travel overall?	Comprises of both foot and cycle assessments
<b>Public Transport</b>	
Does the site support travel by public transport? If not, is the site potentially served by an identified public transport intervention project which is deliverable in the plan period?	Public transport is assessed by access to bus service with PTAL (public transport accessibility level) score of mainly 3 or higher, rail stations within walking distance and existing/committed tram within walking distance taking service capacity into account.
<b>Community Infrastructure</b>	
Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention? Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention? If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?	If there will sufficient space at existing schools to accommodate pupils generated by new housing.  If the site does not have sufficient capacity but could be mitigated through appropriate intervention it will be classed as partially suitable.
<b>Landscape Character</b>	
Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?	Assessed based on landscape and visual assessment which identifies landscape and visual constraints and designations and scope for development in terms of landscape character and visual impact.
<b>Green Network</b>	
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?	Assessment of both present land use (open space and core path network) and identified landscape-scale areas which could be considered to be part of the wider strategic network, based upon landscape assessment and any network opportunities identified in the 2013 SESPlan. Defined as connected areas of green and blue infrastructure which should be multi-functional and joined together strategically.
<b>Flood Risk</b>	
Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?	Assessment of SEPA identified areas at <i>medium-high flood risk (defined as at risk of 1-in-200-yr fluvial flooding)</i> and council info on <i>areas important for flood management</i> . Rules out areas at risk of regular flooding. When it has those designations it will be classed as 'partially' provided they don't cover a major area for the site then it will be a 'no'.
<b>Summary</b>	
Summary of site opportunities and constraints	Summary takes into account overall community infrastructure and overall active travel

Environmental Report	Methodology for Assessing Choices
<b>Biodiversity, Fauna and Flora</b>	<b>To protect and enhance biodiversity, flora and fauna and habitat networks</b>
B1	Would site protect and or enhance the integrity of a European and/or National designated biodiversity site?
B2	Would the site protect and or enhance the integrity of local designated biodiversity sites and wildlife sites?
B3	Would the site protect and or enhance the integrity of existing habitat networks and other wildlife corridors?
B4	Would the site protect and or enhance protected species?
B5	Would the site protect and or enhance ancient woodland?
<b>Population and human health</b>	<b>To improve the quality of life and human health for communities</b>
P1	Would the site be located away from regulated site which would increase the population affected by nuisance (odour, noise), poor air quality or regulated major hazard?
P2	Would the site have an impact on designated quiet areas or noise management areas?
P3	Would the site provide opportunities for active travel or recreation?
P4	Would the site provide opportunities for social interaction and inclusion?
<b>Soil</b>	<b>Protect the quality and quantity of soil</b>
S1	Would the site be located on brownfield land?
<b>Water</b>	<b>Prevent the deterioration and where possible, enhance the status of the water environment and reduce/manage flood risk in a sustainable way</b>
W1	Does the site protect and enhance the water status of major water bodies?
W2	Does the site add to flood risk or reduce flood storage capacity?
<b>Air and Climatic factors</b>	<b>Maintain and improve air quality and reduce the causes and effects of climate change</b>
A1	Does the site provide good accessibility to public transport?
A2	Does the site provide good accessibility to active travel networks?
A3	Does the site affect existing AQMAs?
A4	Does the site prevent increased flooding or instability as a result of climate change?
<b>Material Assets</b>	<b>Minimise waste and promote the sustainable use of natural resources</b>
M1	Does the site result in the loss of/have adverse effects on open space?
M2	Does the site provide access to open space, greenspace/recreational provision?
<b>Cultural Heritage</b>	<b>Protect and where appropriate, enhance the historic environment</b>
H1	Does the site have significant effects on Listed buildings and their settings?
H2	Does the site have significant effects on scheduled monuments and their settings?
H3	Does the site have significant effects on conservation areas?
H4	Does the site have significant effects on the outstanding value of the World Heritage Sites?
H5	Does the site have significant effects on Historic Gardens and Designed Landscapes?
H6	Does the site have significant effects on non-designated heritage assets?
<b>Landscape and Townscape</b>	<b>Protect and enhance the landscape character and setting of the city and improve access to the open space network</b>
L1	Does the site have significant effects on the landscape setting of the city or its townscape?
L2	Does the site enable clear and defensible green belt boundaries to be formed?
L3	Does the site have significant effects on the designated landscape areas?
L4	Does the site support the delivery of the green network?
L3	Does the site have significant effects on the designated landscape areas?
L4	Does the site support the delivery of the green network?

---

**APPENDIX 2 – LANDSCAPE ASSESSMENTS OF WEST EDINBURGH GREENFIELD SITES**

**APPENDIX 2 - LANDSCAPE CONCLUSIONS FOR WEST EDINBURGH GREENFIELD RELEASE SITES (INCLUDING SOUTH RICCARTON SITE)**

Site	Sector	Council CAA	Council LCA	Key Factors Considered in Assessment	Assessment and Conclusions on Scope for Development	Overall conc
South Riccarton	4	<b>45</b> (South of Riccarton- all) & <b>46</b> (Currievale- all)	<b>LCA 27 Gowan Hill farmland - all most all.</b> A narrow corridor of largely arable farmland lying between the wooded policies of Dalmahoy and the linear settlement of Currie and tapering south of Kaimes Hill towards its western boundary. The area forms a gentle valley, contained to the south by the twin hills of Kaimes and Dalmahoy and a long ridge extending east. A railway and transmission lines are aligned through this landscape. The landscape becomes more fragmented on the urban fringes of Currie and Dalmahoy Hill. Woodland areas on the Riccarton Campus. While this area has high inter-visibility with Currie, it is largely screened from view from key roads and from Edinburgh, due to the containment provided by adjacent landform and woodlands.	Flood Risk Murray Burn ( <b>45</b> ) / Dalmahoy Inventory site - E part ( <b>45</b> ) / Core path 16, 17 ( <b>45</b> )	<b>CAAs 38, 45 and 46</b> form a shallow valley, contained by woodland on the edge of Dalmahoy designed landscape and the Riccarton campus and by a ridge to the south where the settlements of Currie and Balerno are located. Woodland and landform provide opportunities to create robust new boundaries to development (Photograph 4A). High voltage transmission lines and a railway line cross this landscape and these features would be likely to constrain development. The Murray Burn flows through this landscape and is traced by some scrub and wetter ground; flood risk is a constraint in the eastern part of the valley floor. Steep slopes occur to the west below Balerno. This landscape comprises productive farmland and some small clustered farms and converted steadings are set on south-facing slopes. These CAAs lie close to Currie and Balerno and, although extensive housing development across this LCA would conflict with the largely linear form of these settlements and would adversely affect the more strongly rural landscape present to the north of the Murray Burn, the area is visually contained. <b>There is scope for development to be accommodated on valley sides with opportunities to create a substantial Green Network and SUDs feature along the Murray Burn as a focus for any development. Off-road cycle and walking routes to Currie and Currie Station would need to be created and consideration should be given to undergrounding transmission lines with the visually discrete Long Dalmahoy area being a preferable site for terminal towers.</b>	Scope for devt but signif impacts
East Riccarton	4	<b>24</b> (East of Riccarton- all)	<b>LCA 29 Gogar farmland and institutions – all.</b> The boundaries of this LCA are formed by the A8, A71 and the city by-pass. To the west, there is a more gradual transition with the adjacent Ratho Farmland LCA. The remnant wooded policies of the late 19th century Gogarburn House in the north accommodate the RBS HQ. Wooded policies also form the setting for the Gogar golf course and the Inventory listed designed landscape of Millburn Tower. Gently undulating land at the core of this character area is occupied by broad open fields used for experimental cropping associated with the Scottish Agricultural Science Agency (SASA). The narrow valley of the Gogar Burn is fringed on its north side by some housing and associated wooded grounds. The Union Canal threads through a narrow corridor, hemmed in between the M8 and the A71. Although close to major transport routes, woodlands visually contain this LCA and also screen large scale buildings, sited within former policies. The Millburn Tower and Gogar Park policies form a continuous wooded backdrop set behind a foreground of arable fields which is highly visible from the city by-pass.		No commentary.	Scope for devt but signif impacts
			<b>LCA 30 East Hermiston farmland – all.</b> This area of arable farmland with some wooded policy features rises gently to the south towards Hermiston and the A71. The M8 and the Union Canal are aligned through this landscape. Intensive poultry production units and some industrial development are dispersed within farmland. The city by-pass creates a strong edge of roadside embankments and tree planting to the city.	Flood Risk Gogar Burn ( <b>24</b> )	Notes CAAs are considered under LCA 29, but no specific commentary.	
			<b>LCA 31 Baberton farmland - almost all.</b> A band of gently rolling arable farmland, lying to the west of the city by-pass and gradually rising in a series of softly rounded and stepped ridges from the A71 in the north to the foot of the Pentland Hills to the south. A golf course is sited within the former policies of the early 17th century Baberton House. The late 20th century housing development of Baberton contrasts with the distinctly linear settlements of Juniper Green and Currie bordering the Water of Leith. This LCA is influenced by high-rise housing on the edge of the city, transmission lines, railway and roads.	Ancient Woodland ( <b>24</b> )	<b>CAA 24.</b> The 2014 Environmental Report concluded that this was not currently a reasonable site for housing development. Landscape and visual constraints included effects on the landscape setting of the city, conflict with the existing character of settlement and the inability to provide suitable green belt boundaries in the local area. The CAA is bounded by the city by-pass to the east and the M8 to the north. The A71 crosses this CAA and a railway line forms the southern boundary. These major transport routes, together with views of higher buildings within nearby Sighthill, the prominent Oriam sports facility within the Heriot Watt University campus, high voltage transmission lines and the Hermiston Park and Ride facility, contribute to the fragmented and semi-developed character of this landscape (Photograph 4B). Housing within Baberton is also visible on rising slopes to the south of this CAA and immediately west of the by-pass. This CAA comprises gently rolling slopes and valleys with a distinct east-west grain, rising gradually to the south. The Hermiston Conservation Area adjacent to the A71, the Heriot Watt University campus at Riccarton and Baberton Golf course are set within wooded surrounds, providing distinctive landscape features and some visual containment of this CAA. While development of this CAA would breach the robust city boundary provided by the by-pass, these peripheral wooded landscapes provide an opportunity to create new settlement boundaries and limit visibility of development from more strongly rural landscapes to the west. The Union Canal crosses this landscape and is important as a Green Network feature, linking city and countryside. It is not widely visible as it lies in a dip, which also limits views out from the canal and towpath. The generally inconspicuous Murray Burn also flows west-east in a shallow trough across arable fields north of the A71. Opportunities to enhance Green Networks could exist provided that generous undeveloped space was retained around these features. This CAA is prominent in views from the A71 and the approach to the city from the west, from some housing on the western fringes of the city, at Baberton and Juniper Green and from a more open section of the city by-pass near the Hermiston junction. Although development of this CAA would substantially change views (for example from the A71 to the Pentland Hills) views to and from this landscape are not highly scenic, due to detractors such as roads infrastructure, high-rise housing and transmission lines. As a result, this CAA does not make a strong contribution to the setting of the city when compared with other landscapes. The city by-pass presents a physical and perceptual barrier to close integration with existing urban areas on the western edge of Edinburgh. The complex infrastructure of the M8 and A71 could also inhibit the design of a cohesive housing development. There would be some adverse effects on the linear settlement pattern of Currie and Juniper Green which border the Water of Leith, although this pattern is less distinct in views from the north, and housing at Baberton has also already weakened it. <b>Overall, it is considered that although some significant visual impacts and breaching of the existing settlement boundary provided by the bypass could arise there is scope to accommodate development in this CAA. This is due to its less strongly rural character and because opportunities exist to create new robust settlement boundaries to the west and south. Careful design would be necessary to achieve a cohesive development and enhance its landscape setting. This should include undergrounding high voltage transmission lines between the existing sub-station at Corslet and the two terminal towers close to the city by-pass. Generous landscape buffers should also be provided around the Murray Burn and Union Canal with associated enhancement and the creation of safe pedestrian and cycle routes across the M8 and A71.</b>	

Kirkliston	5	19 (North Kirkliston- all), 20 (Craigbrae- part), 26 (Carlowie Castle- part), 29 (Conifox- most)	<b>LCA 10 Almond farmland – almost all.</b> This is an extensive character area and the topography ranges from the gently sloping farmland around Craigie Hill, Cammo and Dundas to the flatter landscape closer to Edinburgh Airport. Subtle dips and knolls are sometimes emphasised by woodland, particularly in the area around the Carlowrie Estate. This character area is crossed by the River Almond, which meanders along the flat and open valley floor. Arable fields cover much of the area and these are enclosed with a mix of hedgerows, fences and walls, with occasional field boundary trees. The landscape is crossed by a series of minor roads, the main rail line to Fife and the M9 extension and is very visible from these routes. Edinburgh Airport has a strong influence on landscape character. The area is relatively sparsely settled with scattered stone farm houses and steadings.	Flood Risk (26), (29) / Designed Landscapes (26)	<b>CAAs 19 and 20</b> abut the north and north-eastern edges of Kirkliston. This settlement is associated with the River Almond, but set on south-facing slopes above the floodplain. The settlement is tightly contained by the rail line, M9 and M90 spur road, which loop around its western and northern edges. These embanked transport routes provide robust but unattractive boundaries to the settlement. Any further extension north and westwards would breach these, so visually and perceptually separating any new development from the existing settlement. There is no robust edge to recent housing development adjacent to CAA 20 and any expansion of Kirkliston in this area would need to extend considerably to the north-west to take advantage of a change in landform which could provide the basis for a suitably robust boundary to be created. Development in this area would therefore lie at a substantial distance from the core of Kirkliston. <b>There is no scope for development in this CAA.</b>    <b>CAA 26</b> comprises open farmland, where only the woodlands and outcrop knolls and ridges associated with the Carlowrie estate could readily provide a robust new settlement boundary. Development in this area would consequently lie at a considerable distance from the core of Kirkliston and would breach the existing firm settlement boundary. <b>There is no scope for development in this CAA.</b>    <b>CAA 29</b> comprises the former plant nursery of Conifox, which was closed in late 2018. While much of this area lies within the floodplain of the Almond, it is close to the core of Kirkliston and is visually contained by woodland and high hedges. <b>There is some scope to accommodate housing in this area, provided that the setting to Foxhall House, its parkland and walled garden is protected. There may also be opportunities to create an attractive riverside park and recreational routes in this area to enhance the landscape setting of Kirkliston.</b>	No scope for devt on majority of site
West Edinburgh	4	19 (Norton Park- all)	<b>LCA 9 West Craigs Farmland – part.</b> An area of gently undulating to flat farmland lying to the west of the city and crossed by the A8, airport and railway line. To the south, this landscape merges with the Ratho Farmland which forms a more homogenous swathe of farmland with a distinctive enclosure pattern. This LCA is bordered by industrial development on the edge of Edinburgh, the Airport and Ratho. Large arable fields have an open character and intensive poultry production features in the Norton area. Farmland is fragmented by development and transport corridors. Views are open and extensive and focus on the distant Pentland Hills and the rolling well-wooded hills north-west of the city.	Flood risk over a small part of this CAA	<b>CAA 19</b> comprises north-facing slopes, bounded by the A8 to the north and the railway line to the south. Mature trees and woodland on the west side of the main approach drive to Norton House Hotel would provide a degree of enclosure to new development and, although there would be some views from the railway and A8, visibility would not be widespread or sustained, given the speed of travel and presence of screening vegetation. Development in this area would also be associated with housing at Ratho Station. The area to the east of the main hotel drive comprises slightly more open and gently sloping farmland in the area of Norton Mains and Easter Norton. While there would be some visual association with buildings in the Ingliston area, the busy A8 severs this CAA and there is little residential settlement. Housing located both sides of the Norton House Hotel drive could give an impression of 'ribbon development' as coalescence with existing development occurs along the A8. The eastern part of this CAA would also be more visible from the M8. <b>It is concluded that there is some scope for development in this CAA on the field lying to the west of Norton House Hotel and closer to Ratho Station.</b>	Scope for development
Calderwood	4	26 (Overshiel- all) & 27 (Bonnington- small part)	<b>LCA 24 Upper Almond Valley – part.</b> The Upper Almond Valley becomes an incised valley feature from close to where it is crossed by the M8. It is a wide gorge with valley sides of varying steepness along its length, with some areas of pasture and others covered by woodland. The River Almond is quite wide and the horizontally bedded rock outcrops at various points along the river bed are important features. The woodland associated with the valley sides is mixed, and in the vicinity of Clifton Hall School there are influences from the policy woodland. The river is important for recreation and wildlife and there are paths along the riverside. It is also crossed by the spectacular Lin's Mill Aqueduct carrying the Union Canal.	Special Landscape Area (26) / Ancient Woodland (26)	<b>CAA 26 (only minor part)</b> A number of constraints apply to this landscape. Steep slopes also present physical constraints to development. <b>There is no scope for development.</b>	No scope for devt on majority of site
			<b>LCA 25 Bonnington farmland – most.</b> Gentle undulating farmland, more rolling at the transition with the Ratho Hills LCA. The deeply incised Almond valley forms a boundary to the west, while the M8 marks the transition to the urban area of Newbridge to the north. Flat arable fields around Clifton Mains gently rise to a ridge, which appears as an extension of the Ratho Hills to the south. A distinctive dispersed pattern of farmsteads and the grander Bonnington House and Jupiter Artland sculpture park sit atop this ridge. Remnant trees marking former enclosure patterns sit stranded in enlarged fields. The Union Canal is aligned through this area and is fringed in places by woodland and scrub. The containment provided by landform limits extensive views to and from this LCA.	Ancient woodland (27) / Designed Landscape 133 (27)	<b>CAAs 27 and 28 were excluded from the field assessment, due to the presence of constraints, including inclusion in the SLA, a designed landscape and its setting.</b>    <b>CAA 26</b> lies adjacent to the caravan site but is more open in character. A high voltage transmission line severs the productive farmland on this site. The settlement of East Calder (within West Lothian) is clearly visible to the south-west of this CAA, with some prominent, recently constructed housing, which is not screened by a vegetated edge. Housing sited in this CAA would be physically and perceptually isolated from existing settlement. The openness of the CAA would inhibit the creation of robust edges to new settlement and, although the wooded valley of the Almond provides containment on its northern boundary, <b>there is no scope to accommodate development in this CAA.</b>	
South Riccarton	4	45 (South of Riccarton- all) & 46 (Currievale- all)	<b>LCA 27 Gowan Hill farmland - all most all.</b> A narrow corridor of largely arable farmland lying between the wooded policies of Dalmahoy and the linear settlement of Currie and tapering south of Kaimes Hill towards its western boundary. The area forms a gentle valley, contained to the south by the twin hills of Kaimes and Dalmahoy and a long ridge extending east. A railway and transmission lines are aligned through this landscape. The landscape becomes more fragmented on the urban fringes of Currie and Dalmahoy Hill. Woodland areas on the Riccarton Campus. While this area has high inter-visibility with Currie, it is largely screened from view from key roads and from Edinburgh, due to the containment provided by adjacent landform and woodlands.	Flood Risk Murray Burn (45) / Dalmahoy Inventory site - E part (45) / Core path 16, 17 (45)	<b>CAAs 38, 45 and 46</b> form a shallow valley, contained by woodland on the edge of Dalmahoy designed landscape and the Riccarton campus and by a ridge to the south where the settlements of Currie and Balerno are located. Woodland and landform provide opportunities to create robust new boundaries to development (Photograph 4A). High voltage transmission lines and a railway line cross this landscape and these features would be likely to constrain development. The Murray Burn flows through this landscape and is traced by some scrub and wetter ground; flood risk is a constraint in the eastern part of the valley floor. Steep slopes occur to the west below Balerno. This landscape comprises productive farmland and some small clustered farms and converted steadings are set on south-facing slopes. These CAAs lie close to Currie and Balerno and, although extensive housing development across this LCA would conflict with the largely linear form of these settlements and would adversely affect the more strongly rural landscape present to the north of the Murray Burn, the area is visually contained. <b>There is scope for development to be accommodated on valley sides with opportunities to create a substantial Green Network and SUDs feature along the Murray Burn as a focus for any development. Off-road cycle and walking routes to Currie and Currie Station would need to be created and consideration should be given to undergrounding transmission lines with the visually discrete Long Dalmahoy area being a preferable site for terminal towers.</b>	Scope for devt but signif impacts

---

**APPENDIX 3 – PEGASUS ENVIRONMENTAL ASSESSMENT SITE PROFORMA**

**Environmental Assessment Criteria / Questions**

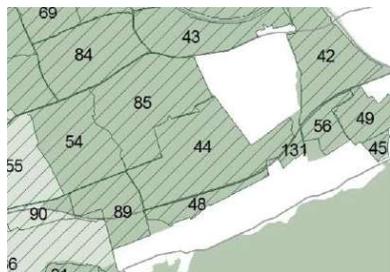
**Example Template**

Council's Assessment	Pegasus scoring
Significant positive effect	Positive (2)
Significant negative effect	Negative (-1)
Uncertain	Unknown (0)
Neutral or no significant effect	Neutral (1)

Site Reference	Site Name	Assessment Scorer	Biodiversity					Population				Soil	Water			Air & Climate				Material Assets		Heritage						Landscape				Total With Weighting Applied					
			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							
Example	Example	Council																																			
		Pegasus																																			

Biodiversity	Population	Soil	Water	Air & Climate	Material Assets	Heritage	Landscape
<p><b>B1:</b> Would site protect and or enhance the integrity of a European and/or National designated biodiversity site?</p> <p><b>B2:</b> Would the site protect and or enhance the integrity of local designated biodiversity sites and wildlife sites?</p> <p><b>B3:</b> Would the site protect and or enhance the integrity of existing habitat networks and other wildlife corridors?</p> <p><b>B4:</b> Would the site protect and or enhance protected species?</p> <p><b>B5:</b> Would the site protect and or enhance ancient woodland?</p>	<p><b>P1:</b> Would the site be located away from regulated site which would increase the population affected by nuisance (odour, noise), poor air quality or regulated major hazard?</p> <p><b>P2:</b> Would the site have an impact on designated quiet areas or noise management areas?</p> <p><b>P3:</b> Would the site provide opportunities for active travel or recreation?</p> <p><b>P4:</b> Would the site provide opportunities for social interaction and inclusion?</p>	<p><b>S1:</b> Would the site be located on brownfield land?</p>	<p><b>W1:</b> Does the site protect and enhance the water status of major water bodies?</p> <p><b>W2:</b> Does the site add to flood risk or reduce flood storage capacity?</p>	<p><b>A1:</b> Does the site provide good accessibility to public transport?</p> <p><b>A2:</b> Does the site provide good accessibility to active travel networks?</p> <p><b>A3:</b> Does the site affect existing AQMAs?</p> <p><b>A4:</b> Does the site prevent increased flooding or instability as a result of climate change?</p>	<p><b>M1:</b> Does the site result in the loss of/have adverse effects on open space?</p> <p><b>M2:</b> Does the site provide access to open space, greenspace/recreational provision?</p>	<p><b>H1:</b> Does the site have significant effects on Listed buildings and their settings?</p> <p><b>H2:</b> Does the site have significant effects on scheduled monuments and their settings?</p> <p><b>H3:</b> Does the site have significant effects on conservation areas?</p> <p><b>H4:</b> Does the site have significant effects on the outstanding value of the World Heritage Sites?</p> <p><b>H5:</b> Does the site have significant effects on Historic Gardens and Designed Landscapes?</p> <p><b>H6:</b> Does the site have significant effects on</p>	<p><b>L1:</b> Does the site have significant effects on the landscape setting of the city or its townscape?</p> <p><b>L2:</b> Does the site enable clear and defensible green belt boundaries to be formed?</p> <p><b>L3:</b> Does the site have significant effects on the designated landscape areas?</p> <p><b>L4:</b> Does the site support the delivery of the green network?</p>

**South Riccarton (Parcel 44) - Environmental Assessment Criteria**

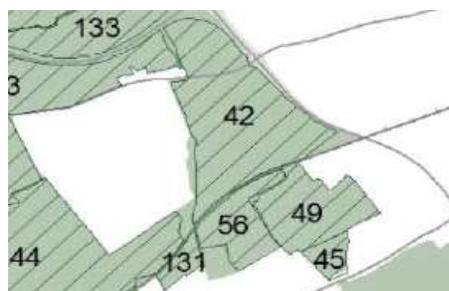


Council's Assessment	Pegasus scoring
Significant positive effect	Positive (2)
Significant negative effect	Negative (-1)
Uncertain	Unknown (0)
Neutral or no significant effect	Neutral (1)

Site Reference	Site Name	Env. Code	Biodiversity					Population				Soil		Water		Air & Climate				Material Assets		Heritage						Landscape				Total With Weighting Applied
			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		
44	South Riccarton	Council Pegasus	Not Assessed																												29	
			1	1	1	1	1	1	1	2	1	-1	0	1	2	2	1	1	1	2	1	1	1	1	0	1	2	1	1	29		

Biodiversity	Population	Soil	Water	Air & Climate	Material Assets	Heritage	Landscape
<p><b>B1:</b> The site could enhance biodiversity if it increased the connectivity of green networks but it isn't located in a designated European and/or national designated site.</p> <p><b>B2:</b> There is a Local Biodiversity Site to the north of the site which can be seen in the map provided in Environment Study, but this is not within the site.</p> <p><b>B3:</b> The site has the potential to protect and enhance existing habitat networks and wildlife corridors through appropriate design. Therefore neutralising the negative effect development may have.</p> <p><b>B4:</b> The site has the potential to protect and enhance protected species which is achievable through appropriate design.</p> <p><b>B5:</b> The site has potential to neutralise the effect of development on ancient woodlands by providing and enhancing existing as there</p>	<p><b>P1:</b> The site is not located in an area of poor air quality and isn't within a noise management area in accordance with the maps provided in the Environment Study.</p> <p><b>P2:</b> The site isn't located within a quiet area or noise management area and therefore has no effect and can be classed as neutral.</p> <p><b>P3:</b> There could be a link provided to the national cycle network via the university campus.</p> <p><b>P4:</b> The site has potential for social interaction and social inclusion facilities to be provided especially due to its location to Heriot Watt University and therefore scores neutrally.</p>	<p><b>S1:</b> The site isn't located on brownfield land but it is unlikely all of Edinburgh's housing need will be met by brownfield.</p>	<p><b>W1:</b> The status of water bodies is unknown.</p> <p><b>W2:</b> The SEPA mapping shows the site adjacent to the park and ride is medium risk of flooding with the land adjacent to Murray Burn being high risk. There are also some areas that are at high risk of surface water flooding, but it is likely that the design can mitigate and reduce the effects.</p>	<p><b>A1:</b> The site is adjacent to Curriehill train station that has frequent services to Edinburgh and Glasgow.</p> <p><b>A2:</b> The site has potential to be integrated and connected to the cycle network.</p> <p><b>A3:</b> The site is not located in a AQMA and therefore has neutral effect the councils assessment noted that greenfield sites are likely to be more detrimental to air quality than brownfield sites but this is not always true as some brownfield sites could promote unsustainable travel.</p> <p><b>A4:</b> The site is susceptible to flooding but this can be mitigated through the design</p>	<p><b>M1:</b> There isn't any designated open space such as public space within the site, it is open countryside.</p> <p><b>M2:</b> The site can enhance and connect to open space.</p>	<p><b>H1:</b> There are some listed buildings within the farmsteads within the site but it is unlikely that the development will have an adverse impact on these.</p> <p><b>H2:</b> There are no scheduled monuments within the site so there is neither a negative or positive effect.</p> <p><b>H3:</b> There is not a conservation area within the site or near to the site so there is neither a negative or positive effect.</p> <p><b>H4:</b> There is not a World Heritage Site within the site or near to the site so there is neither a negative or positive effect.</p> <p><b>H5:</b> There is not a Historic Garden &amp; Designed Landscape within the site or near to the site so there is neither a negative or positive effect.</p> <p><b>H6:</b> Unknown</p>	<p><b>L1:</b>The site does have a significant effect on the landscape but this can be mitigated by careful screening and enhancing the site boundaries</p> <p><b>L2:</b> Parts of the site such as the Burn, the university site wall acts as good boundaries that can be formed.</p> <p><b>L3:</b> No and this is supported by the landscape study saying that development could be well hidden.</p> <p><b>L4:</b> Careful design of the site can contribute to the green network, our point is supported by the Landscape Study which also said it can be hidden well.</p>

**East Riccarton - Environmental Assessment Criteria**

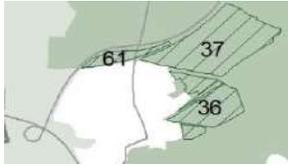


Council's Assessment	Pegasus scoring
Significant positive effect	Positive (2)
Significant negative effect	Negative (-1)
Uncertain	Unknown (0)
Neutral or no significant effect	Neutral (1)

Site Reference	Site Name	Env. Code	Biodiversity					Population				Soil	Water		Air & Climate				Material Assets		Heritage						Landscape				Total With Weighting Applied
			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	
42	East of Riccarton	Council	-	X	?	?	-	-	-	X	?	X	?	?	-	-	?	X	-	Y	X	X	?	-	-	X	-	-	?	-	7
		Pegasus	1	1	1	1	1	1	1	2	1	-1	0	1	2	2	1	1	1	2	1	1	1	1	1	0	1	2	-1	1	27

Biodiversity	Population	Soil	Water	Air & Climate	Material Assets	Heritage	Landscape
<p><b>B1:</b> The site could enhance biodiversity if it increased the connectivity of green networks but it isn't located in a designated European and/or national designated site.</p> <p><b>B2:</b> There is a Local Biodiversity Site to the north of the site which can be seen in the map provided in Environment Study and runs through the northern part of the site but this can be mitigated through design and doesn't impact the whole site.</p> <p><b>B3:</b> The site has the potential to protect and enhance existing habitat networks and wildlife corridors through appropriate design. Therefore neutralising the negative effect development may have.</p> <p><b>B4:</b> The site has the potential to protect and enhance protected species which is achievable through appropriate design.</p> <p><b>B5:</b> The site has potential to neutralise the effect of development on ancient woodlands by providing and enhancing existing.</p>	<p><b>P1:</b> The site is not located in an area of poor air quality and isn't within a noise management area in accordance with the maps provided in the Environment Study.</p> <p><b>P2:</b> The site isn't located within a quiet area or noise management area and therefore has no effect and can be classed as neutral</p> <p><b>P3:</b> The site is adjacent to the National Cycle Network that goes directly into Edinburgh city centre. The Council's assessment notes that there is a city bypass acting as a barrier for active travel. States that the strategy should bring forward new transport and active travel to reduce air pollution.</p> <p><b>P4:</b> The site has potential for social interaction and social inclusion facilities to be provided especially due to its location to Heriot Watt University and therefore scores neutrally.</p>	<p><b>S1:</b> The site isn't located on brownfield land but it is unlikely all of Edinburgh's housing need will be met by brownfield.</p>	<p><b>W1:</b> The status of water bodies is unknown .</p> <p><b>W2:</b> The SEPA mapping shows the site adjacent to the park and ride is medium risk of flooding with the land adjacent to Murray Burn being high risk. There are also some areas that are at high risk of surface water flooding, but it is likely that the design can mitigate and reduce the effects.</p>	<p><b>A1:</b> The site is adjacent to a Park &amp; Ride Facility.</p> <p><b>A2:</b> The site has potential to be integrated and connected to the cycle network.</p> <p><b>A3:</b> The site is not located in a AQMA and therefore has neutral effect the councils assessment noted that greenfield sites are likely to be more detrimental to air quality than brownfield sites but this is not always true as some brownfield sites could promote unsustainable travel.</p> <p><b>A4:</b> The site is susceptible to flooding but this can be mitigated through the design</p>	<p><b>M1:</b> The site is a parcel between two built up areas; Sighthill to the east and Heriot Watt University to the west. The Edinburgh bypass and Riccarton Mains Road act as strong defensible Green Belt boundaries.</p> <p><b>M2:</b> The site can enhance and connect to open space</p>	<p><b>H1:</b> There are a cluster of listed buildings on the site</p> <p><b>H2:</b> There is a scheduled ancient monuments on the site but these could be mitigated in terms of design.</p> <p><b>H3:</b> Hermiston Conservation area is adjacent to the site</p> <p><b>H4:</b> Agree with councils ranking that the site does not have an effect on the outstanding value of the World Heritage Sites.</p> <p><b>H5:</b> Agree with councils ranking that the site does not have significant effects on Historic Gardens and Designed Landscapes.</p> <p><b>H6:</b> The council's assessment states there is a non-designated heritage assets within in but these aren't included in the supplementary maps</p>	<p><b>L1:</b> Agree with council's ranking - that the site does not have a significant effect on the landscape of the city or its townscape.</p> <p><b>L2:</b> There is a bypass and urban built up area to the north east and west that would act as good boundaries. The south leaves the site quite open from the countryside.</p> <p><b>L3:</b> The site is adjacent to a Special Landscape Area so this would need to be taken into account (LCA 29)</p> <p><b>L4:</b> Agree with councils scoring that the site has a neutral effect on the delivery of the green network.</p>

Kirkliston - Environmental Assessment Criteria

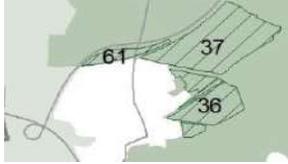


Council's Assessment	Pegasus scoring
Significant positive effect	Positive (2)
Significant negative effect	Negative (-1)
Uncertain	Unknown (0)
Neutral or no significant effect	Neutral (1)

Site Reference	Site Name	Env. Code	Biodiversity			Population			Soil			Water			Air & Climate				Material Assets				Heritage				Landscape				Total With Weighting Applied						
			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							
37	Carlowrie Castle	Council	-	X	7	7	-	X	-	-	7	X	7	7	X	X	7	X	-	-	X	-	-	-	-	X	-	-	-	-	-	-	-	-	-	-	4
			Pegasus	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
34	Craigbrae	Council	-	-	7	7	-	-	-	-	-	7	X	7	7	X	X	7	X	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	10	
			Pegasus	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
36	Conifox	Council	-	-	7	7	-	-	-	-	-	7	X	7	7	X	X	7	X	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	13
			Pegasus	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
61	North Kirkliston	Council	-	-	-	-	7	7	-	-	-	-	-	-	-	7	X	X	7	X	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	12
			Pegasus	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Composite Score Council																												9.75									
Composite Score Pegasus																												15.75									

Carlowrie Castle	Biodiversity	Population	Soil	Water	Air & Climate	Material Assets	Heritage	Landscape
<b>B1:</b> The site could enhance biodiversity if it increased the connectivity of green networks but isn't located in a designated European and/or national designated site. <b>B2:</b> There is a local biodiversity site to the south of the site but this does not directly impact the site. <b>B3:</b> The site has the potential to protect and enhance existing habitat networks and wildlife corridors through appropriate design. Therefore neutralising the negative effect development may have. <b>B4:</b> The site has the potential to protect and enhance protected species which is achievable through appropriate design. <b>B5:</b> The site has potential to neutralise the effect of development on ancient woodlands by providing and enhancing existing.	<b>P1:</b> Close to the airport, motorway and railway which could have noise issues but the development on the site would be located adjacent next to an existing settlement. <b>P2:</b> The site isn't located within a quiet area or noise management area and therefore has no effect and can be classed as neutral. <b>P3:</b> The site isn't located to the cycle network and this is noted in the council's ES study <b>P4:</b> The site could create a social space as part of the development.	<b>S1:</b> The site isn't located on brownfield land but it is unlikely all of Edinburgh's housing need will be met by brownfield. <b>W1:</b> The status of water bodies is unknown. <b>W2:</b> The site is not within a Flood Risk area there are very small areas that are at high risk of surface water according to the SEPA mapping but these are very minor. Disagree with the council on their rating as unknown. <b>A1:</b> The site does not have good transport links. The council note that the site does not have good links. <b>A2:</b> The site does not have access to the cycle network, active travel routes could be provided within the site but these would need to be connected to the wider network for them to be sustainable and allow people to access locations beyond Kirkliston. The council's study notes that there is no access to the wider cycle network. <b>A3:</b> The site is not located in an AQMA and therefore has neutral effect the council's assessment noted that greenfield sites are likely to be more detrimental to air quality than brownfield sites but this is not always true as some brownfield sites could promote unsustainable travel. <b>A4:</b> The site is not located in a flood zone according to SEPA and Magic Maps. The ES says half the site is within 1 in 200 year flood zone but the flood risk map doesn't show this"	<b>M1:</b> The site could provide open space within it but currently the site is being used for agricultural purposes so isn't providing high quality open space that is accessible to the public. <b>M2:</b> There is some recreational space adjacent to the site that development to the west has provided so the site could connect to this and enhance it.	<b>H1:</b> There is a Category B (Almonhill Steading) and Category C (Almonhill Farmhouse) listed building according to Historic Scotland but these can be mitigated against through the design. <b>H2:</b> There are no Scheduled Ancient Monuments on the site. <b>H3:</b> The site is not located within a conservation area. <b>H4:</b> Agree with councils opinion that the site does not have an effect on the outstanding value of the World Heritage Sites. <b>H5:</b> There is a designated Gardens and Designed Landscape (Dundas Castle) to the north of the site beyond the M6 but due to the existing development it is unlikely to have a significant effect on these. <b>H6:</b> The assessment states there is a non-designated heritage assets within the site (Long Cist) but these aren't included in the assessment.	<b>L1:</b> Agree with councils ranking - that the site does not have a significant effect on the landscape of the city or its townscape. <b>L2:</b> New GB boundaries would be needed as there are currently no obvious boundaries to the east. The M50 and railway line to the north, Burnshot Road to the south and the development to the west all act as good Green Belt boundaries. <b>L3:</b> There is a Special Landscape Area to the north west beyond the motorway but it is unlikely that development would have a significant effect on this especially given its location to the existing development. <b>L4:</b> Agree with councils scoring that the site has a neutral effect on the delivery of the green network.			

Kirkliston - Environmental Assessment Criteria



Council's Assessment	Pegasus scoring
Significant positive effect	Positive (2)
Significant negative effect	Negative (-1)
Uncertain	Unknown (0)
Neutral or no significant effect	Neutral (1)

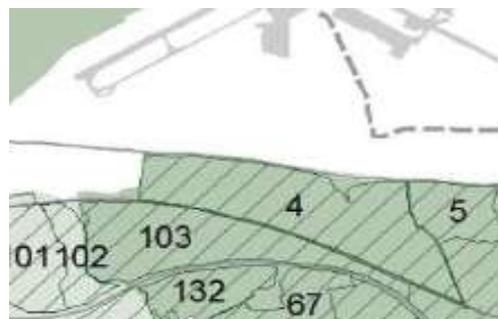
Site Reference	Site Name	Env. Code	Biodiversity		Population			Soil		Water			Air & Climate				Material Assets		Heritage						Landscape				Total With Weighting Applied								
			B1	B2	B3	B4	B5	P1	P2	P3	P4	S1	W1	W2	A1	A2	A3	A4	M1	M2	H1	H2	H3	H4	H5	H6	L1	L2		L3	L4						
37	Carlowrie Castle	Council	-	X	?	?	-	X	-	-	?	X	?	?	?	X	X	?	X	-	-	X	-	-	-	-	X	-	X	-	-	-	-	-	-	-	4
			Pegasus	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
34	Craigbrae	Council	-	-	?	?	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	10
			Pegasus	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
36	Conifox	Council	-	-	?	?	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	13
			Pegasus	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
61	North Kirkliston	Council	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	12
			Pegasus	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Composite Score Council																												9.75									
Composite Score Pegasus																												15.75									

Craigbrae	Biodiversity	Population	Soil	Water	Air & Climate	Material Assets	Heritage	Landscape
<p><b>B1:</b> The site could enhance biodiversity if it increased the connectivity of green networks but it isn't located in a designated European and/or national designated site.</p> <p><b>B2:</b> There is a local biodiversity site to the south of the site but this does not directly impact the site.</p> <p><b>B3:</b> The site has the potential to protect and enhance existing habitat networks and wildlife corridors through appropriate design.</p> <p>Therefore neutralising the negative effect development may have.</p> <p><b>B4:</b> The site has the potential to protect and enhance protected species which is achievable through appropriate design.</p> <p><b>B5:</b> The site has potential to neutralise the effect of development on ancient woodlands by providing</p>	<p><b>P1:</b> Close by to the airport, motorway and railway which could have noise issues but the development on the site would be located adjacent next to an existing settlement.</p> <p><b>P2:</b> The site isn't located within a quiet area or noise management area and therefore has no effect and can be classed as neutral</p> <p><b>P3:</b> The site isn't located to the cycle network and this is noted in the council's ES study</p> <p><b>P4:</b> The site could create a social space as part of the development.</p>	<p><b>S1:</b> The site isn't located on brownfield land but it is unlikely all of Edinburgh's housing need will be met by brownfield.</p>	<p><b>W1:</b> The status of water bodies is unknown.</p> <p><b>W2:</b> The site is not within a Flood Risk area but it is adjacent to a high risk river flooding area.</p>	<p><b>A1:</b> The sites does not have good transport links.</p> <p><b>A2:</b> The site does not have access to the cycle network, active travel routes could be provided within the site but these would need to be connected to the wider network for them to be sustainable and allow people to access locations beyond Kirkliston.</p> <p><b>A3:</b> The site is not located in a AQMA and therefore has neutral effect the councils assessment noted that greenfield sites are likely to be more detrimental to air quality than brownfield sites but this is not always true as some brownfield sites could promote unsustainable travel.</p> <p><b>A4:</b> The site is not located in a flood zone.</p>	<p><b>M1:</b> The site could provide open space within it but currently the site is being used for agricultural purposes so isn't providing high quality open space that is accessible to the public.</p> <p><b>M2:</b> The site can enhance and connect to open space.</p>	<p><b>H1:</b> There is not a significant effect on listed buildings as there is none on the site.</p> <p><b>H2:</b> There are no Scheduled Ancient Monuments on the site.</p> <p><b>H3:</b> The site is not located within a conservation area.</p> <p><b>H4:</b> Agree with councils ranking that the site does not have an effect on the World Heritage Sites.</p> <p><b>H5:</b> Agree with councils ranking that the site does not have significant effects on Historic Gardens and Designed Landscapes.</p> <p><b>H6:</b> There are no maps showing non-designated heritage assets.</p>	<p><b>L1:</b> Agree with councils ranking - that the site does not have a significant effect on the landscape of the city or its townscapes.</p> <p><b>L2:</b> The site is contained by the surrounding roads but the site could sprawl to the east.</p> <p><b>L3:</b> There are no designated landscape areas close to the site</p> <p><b>L4:</b> Agree with councils scoring that the site has a neutral effect on the delivery of the green network.</p>	





West Edinburgh - Environmental Assessment Criteria

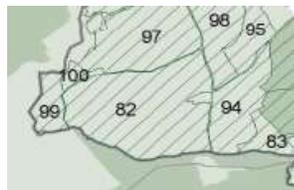


Council's Assessment	Pegasus scoring
Significant positive effect	Positive (2)
Significant negative effect	Negative (-1)
Uncertain	Unknown (0)
Neutral or no significant effect	Neutral (1)

Site Reference	Site Name	Env. Code	Biodiversity		Population				Soil	Water			Air & Climate				Material Assets		Heritage						Landscape				Total With Weighting Applied		
			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	
4	Norton Park	Council	-	-	?	?	?	-	-	X	-	X	?	?	-	-	?	X	-	-	X	X	-	-	-	-	-	-	?	-	11
		Pegasus	1	1	1	1	1	1	1	1	1	-1	0	1	1	-1	0	1	1	2	1	-1	1	1	1	0	1	1	-1	1	18

Biodiversity	Population	Soil	Water	Air & Climate	Material Assets	Heritage	Landscape
<p><b>B1:</b> The site could enhance biodiversity if it increased the connectivity of green networks but it isn't located in a designated European and/or national designated site.</p> <p><b>B2:</b> There is a local biodiversity site to the east of the site but this does not directly impact the site.</p> <p><b>B3:</b> The site has the potential to protect and enhance existing habitat networks and wildlife corridors through appropriate design. Therefore neutralising the negative effect development may have.</p> <p><b>B4:</b> The site has the potential to protect and enhance protected species which is achievable through appropriate design.</p> <p><b>B5:</b> There is an ancient woodland adjacent to the site but the development is unlikely to have a negative effect on this.</p>	<p><b>P1:</b> The site is close by to the airport, railway and Glasgow Road (A8) but it is unlikely that this will have a negative effect on the area.</p> <p><b>P2:</b> The site isn't located within a quiet area or noise management area and therefore has no effect and can be classed as neutral.</p> <p><b>P3:</b> The site can be accessed from Glasgow Road that has walking paths alongside it, despite it being a busy road. The ES states it is adjacent to the National Cycle Network but then scores this negatively.</p> <p><b>P4:</b> The site could create a social space as part of the development.</p>	<p><b>S1:</b> The site isn't located on brownfield land but it is unlikely all of Edinburgh's housing need will be met by brownfield.</p>	<p><b>W1:</b> The status of water bodies is unknown .</p> <p><b>W2:</b> The site has some small areas that are at high risk of surface water flooding on the SEPA mapping. The ES states that the site is in a 1 in 200 risk of flooding.</p>	<p><b>A1:</b> The tram station is over a 20 minute walk and the walk has some physical boundaries and isn't a pleasant walk under an underpass. There are two bus stops in close proximity to the site that provide regular services to Edinburgh.</p> <p><b>A2:</b> The site isn't in close proximity to the NCN there is a small footpath on the site of Glasgow Road but this wouldn't be sufficient there is plans for a QuietRoute proposal but this hasn't gone ahead as of yet.</p> <p><b>A3:</b> Using the councils environment study maps, the site is located next to an air quality management area. The affect of development on these areas is uncertain.</p> <p><b>A4:</b> The site has some small areas that are at high risk of surface water flooding on the SEPA mapping.</p>	<p><b>M1:</b> The site could provide open space within it but currently the site is being used for agricultural purposes so isn't providing high quality open space that is accessible to the public.</p> <p><b>M2:</b> There is public open space to the west of the development that could be connected to the site.</p>	<p><b>H1:</b> There are some listed buildings within the site e.g. Norton House Hotel (Category C), 6,8,11,12 Glasgow Road (Category C) and two Category C at Norton Mains in the south east of the site.</p> <p><b>H2:</b> There is a Standing Stone within the eastern part of the site and is classed as a Scheduled Monument.</p> <p><b>H3:</b> The site is not located within a conservation area.</p> <p><b>H4:</b> Agree with councils ranking that the site does not have an effect on the outstanding value of the World Heritage Sites.</p> <p><b>H5:</b> There is a historic garden and designed landscape to the east of the site at Milburn Tower but this is 1.3km from the site so it is likely to be unaffected by the development.</p> <p><b>H6:</b> Unknown if there are</p>	<p><b>L1:</b> Agree with council - the site doesn't contribute to the landscape setting.</p> <p><b>L2:</b> The site can be contained by Glasgow Road, the railway line but going to the west this could merge Ratho with Sighthill if it keeps sprawling towards the east, especially given the prospectus development at East Milburn Tower.</p> <p><b>L3:</b> There is a SLA adjacent to the site and developing the site may be detrimental to this.</p> <p><b>L4:</b> Potential link to the golf course.</p>

Calderwood - Environmental Assessment Criteria

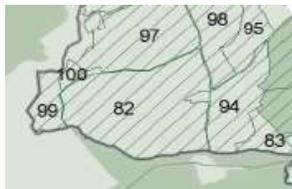


Council's Assessment	Pegasus scoring
Significant positive effect	Positive (2)
Significant negative effect	Negative (-1)
Uncertain	Unknown (0)
Neutral or no significant effect	Neutral (1)

Site Reference	Site Name	Env. Code	Biodiversity				Population				Soil				Water				Air & Climate				Material Assets		Heritage				Landscape				Total With Weighting Applied
			B1	B2	B3	B4	P1	P2	P3	P4	S1	W1	W2	A1	A2	A3	A4	M1	M2	H1	H2	H3	H4	H5	H6	L1	L2	L3	L4				
99	Overshield	Council	-	?	?	-	-	-	-	-	X	-	-	X	X	?	X	-	X	?	-	-	-	-	X	-	-	X	-	9			
		Pegasus	1	-1	1	1	-1	1	1	-1	1	-1	0	1	-1	-1	1	1	1	1	1	1	1	1	0	1	-1	1	1	12			
82	Bonnington	Council	-	-	?	?	?	X	-	X	-	X	?	?	X	X	?	X	-	X	X	-	-	-	-	-	-	X	X	-	2		
		Pegasus	1	1	1	1	-1	1	1	-1	1	-1	0	1	-1	-1	1	1	1	1	1	1	1	1	0	1	-1	-1	1	1	12		
Composite Score Council																											5.5						
Composite Score Pegasus																											12						

Overshield	Biodiversity	Population	Soil	Water	Air & Climate	Material Assets	Heritage	Landscape
<p><b>B1:</b> The site could enhance biodiversity if it increased the connectivity of green networks but it isn't located in a designated European and/or national designated site.</p> <p><b>B2:</b> There is a local designated biodiversity site in the north of the site.</p> <p><b>B3:</b> The site has the potential to protect and enhance existing habitat networks and wildlife corridors through appropriate design. Therefore neutralising the negative effect development may have.</p> <p><b>B4:</b> The site has the potential to protect and enhance protected species which is achievable through appropriate design.</p> <p><b>B5:</b> There is an ancient woodland within the site.</p>	<p><b>P1:</b> The site being located away from public transport will effect the air quality by increasing the number of car trips but it is not in an area that has poor air/ noise quality.</p> <p><b>P2:</b> The site isn't located within a quiet area or noise management area and therefore has no effect and can be classed as neutral.</p> <p><b>P3:</b> The site isn't connected to the cycle network. The adjacent development may provide opportunities for recreation.</p> <p><b>P4:</b> The site could create a social space as part of the development.</p>	<p><b>S1:</b> The site isn't located on brownfield land but it is unlikely all of Edinburgh's housing need will be met by brownfield.</p>	<p><b>W1:</b> The status of water bodies is unknown .</p> <p><b>W2:</b> The SEPA map shows that parts of the site are at risk of surface water flooding but these are not large areas.</p>	<p><b>A1:</b> Kirknewton Train Station is located over a 30 minute walk from the site and there is a bus stop 15 minutes from the site.</p> <p><b>A2:</b> There isn't a cycle network close to the site and there are no facilities that are in close walking distance to the site.</p> <p><b>A3:</b> The site is not located in a AQMA and therefore has neutral effect the council's assessment noted that greenfield sites are likely to be more detrimental to air quality than brownfield sites but this is not always true as some brownfield sites could promote unsustainable travel.</p> <p><b>A4:</b> The SEPA map shows that parts of the site are at risk of surface water flooding but these are not large areas.</p>	<p><b>M1:</b> The site could provide open space within it but currently the site is being used for agricultural purposes so isn't providing high quality open space that is accessible to the public.</p> <p><b>M2:</b> The site has potential to include open space but connections to existing are not available due to the lack of provision.</p>	<p><b>H1:</b> There is a Category B listed building within the site: Overshield Farm House.</p> <p><b>H2:</b> There are no Scheduled Ancient Monuments on the site.</p> <p><b>H3:</b> The site is not located within a conservation area.</p> <p><b>H4:</b> Agree with councils ranking that the site does not have an effect on the outstanding value of the World Heritage Sites.</p> <p><b>H5:</b> Agree with councils ranking that the site does not have significant effects on Historic Gardens and Designed Landscapes.</p> <p><b>H6:</b> Unknown if there are any non-designated heritage assets.</p>	<p><b>L1:</b> Agree with council - the site doesn't contribute to the landscape setting.</p> <p><b>L2:</b> The site isn't very well contained by Green belt boundaries.</p> <p><b>L3:</b> There isn't a SLA within the site.</p> <p><b>L4:</b> Potential links to the open countryside that the site is situated in.</p>	

Calderwood - Environmental Assessment Criteria



Council's Assessment	Pegasus scoring
Significant positive effect	Positive (2)
Significant negative effect	Negative (-1)
Uncertain	Unknown (0)
Neutral or no significant effect	Neutral (1)

Site Reference	Site Name	Env. Code	Biodiversity		Population		Soil		Water		Air & Climate			Material Assets		Heritage			Landscape			Total With Weighting Applied								
			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
99	Overshield	Council	-	?	?	-	?	-	-	-	X	-	-	X	X	?	X	-	X	?	-	-	-	-	X	-	-	X	-	9
		Pegasus	1	-1	1	1	-1	1	1	-1	1	-1	0	1	-1	-1	1	1	1	1	1	1	1	1	1	0	1	-1	1	12
82	Bonnington	Council	-	-	?	?	?	X	-	X	?	?	X	X	?	X	-	X	X	-	-	-	-	-	-	X	X	-	2	
		Pegasus	1	1	1	1	-1	1	1	-1	1	-1	0	1	-1	-1	1	1	1	1	1	1	1	1	1	0	1	-1	-1	12
																					Composite Score Council		5.5							
																					Composite Score Pegasus		12							

Bonnington	Biodiversity	Population	Soil	Water	Air & Climate	Material Assets	Heritage	Landscape
<p><b>B1:</b> The site could enhance biodiversity if it increased the connectivity of green networks but it isn't located in a designated European and/or national designated site.</p> <p><b>B2:</b> There is a local biodiversity site to the north east of the site but this does not directly impact the site.</p> <p><b>B3:</b> The site has the potential to protect and enhance existing habitat networks and wildlife corridors through appropriate design. Therefore neutralising the negative effect development may have.</p> <p><b>B4:</b> The site has the potential to protect and enhance protected species which is achievable through appropriate design.</p> <p><b>B5:</b> There is an ancient woodland within the site.</p>	<p><b>P1:</b> The site being located away from public transport will effect the air quality by increasing the number of car trips but it is not in an area that has poor air/ noise quality.</p> <p><b>P2:</b> The site isn't located within a quiet area or noise management area and therefore has no effect and can be classed as neutral.</p> <p><b>P3:</b> The site isn't connected to the cycle network. The adjacent development may provide opportunities for recreation.</p> <p><b>P4:</b> The site could create a social space as part of the development.</p>	<p><b>S1:</b> The site isn't located on brownfield land but it is unlikely all of Edinburgh's housing need will be met by brownfield.</p>	<p><b>W1:</b> The status of water bodies is unknown .</p> <p><b>W2:</b> The SEPA map shows that parts of the site are at risk of surface water flooding but these are not large areas.</p>	<p><b>A1:</b> Kirknewton Train Station is located over a 40 minute walk from the site and there is a bus stop 30 minutes from the site.</p> <p><b>A2:</b> There isn't a cycle network close to the site and there are no facilities that are in close walking distance to the site.</p> <p><b>A3:</b> The site is not located in a AQMA and therefore has neutral effect the council's assessment noted that greenfield sites are likely to be more detrimental to air quality than brownfield sites but this is not always true as some brownfield sites could promote unsustainable travel.</p> <p><b>A4:</b> The SEPA map shows that parts of the site are at risk of surface water flooding but these are not large areas.</p>	<p><b>M1:</b> The site could provide open space within it but currently the site is being used for agricultural purposes so isn't providing high quality open space that is accessible to the public.</p> <p><b>M2:</b> The site has potential to include open space but connections to existing are not available due to the lack of provision.</p>	<p><b>H1:</b> There are 3 Category A (which is the highest listed) listed buildings within the site (Bonnington Dovecote, Bonnington House, Bonnington Sundial).</p> <p><b>H2:</b> There are no Scheduled Ancient Monuments on the site.</p> <p><b>H3:</b> The site is not located within a conservation area.</p> <p><b>H4:</b> Agree with councils ranking that the site does not have an effect on the outstanding value of the World Heritage Sites.</p> <p><b>H5:</b> Agree with councils ranking that the site does not have significant effects on Historic Gardens and Designed Landscapes.</p> <p><b>H6:</b> Unknown if there are any non-designated heritage assets.</p>	<p><b>L1:</b> Agree with council - the site doesn't contribute to the landscape setting.</p> <p><b>L2:</b> The site isn't very well contained by Green belt boundaries.</p> <p><b>L3:</b> There is a SLA that is partially in the eastern part of the site adjacent to the site.</p> <p><b>L4:</b> Potential links to the open countryside that the site is situated in.</p>	

**Crosswinds - Environmental Assessment Criteria**



Council's Assessment	Pegasus scoring
Significant positive effect (Y)	Positive (2)
Significant negative effect (X)	Negative (-1)
Uncertain (?)	Unknown (0)
Neutral or no significant effect (-)	Neutral (1)

Site Reference	Site Name	Env. Code	Biodiversity		Population				Soil	Water		Air & Climate				Material Assets		Heritage						Landscape				Total With Weighting Applied				
			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		
406	Crosswinds	Council	-	?	-	-	-	-	-	-	?	Y	?	?	X	-	-	X	-	-	?	-	-	-	-	-	X	-	-	-	-	18
		Pegasus	1	1	1	1	1	-1	1	2	1	2	0	1	2	2	1	1	1	1	1	1	1	1	1	0	1	1	1	1	28	

Biodiversity	Population	Soil	Water	Air & Climate	Material Assets	Heritage	Landscape
<p><b>B1:</b> The site could enhance biodiversity if it increased the connectivity of green networks but it isn't located in a designated European and/or national designated site.</p> <p><b>B2:</b> The site is not located within or near to a local designated site.</p> <p><b>B3:</b> The site has the potential to protect and enhance existing habitat networks and wildlife corridors through appropriate design. Therefore neutralising the negative effect development may have.</p> <p><b>B4:</b> The site has the potential to protect and enhance protected species which is achievable through appropriate design.</p> <p><b>B5:</b> There isn't an ancient woodland within the site.</p>	<p><b>P1:</b> The site is located directly next to the airport which would be noisy and disruptive for future residents.</p> <p><b>P2:</b> The site isn't located within a quiet area or noise management area and therefore has no effect and can be classed as neutral.</p> <p><b>P3:</b> The site isn't located on a national cycle route but there is a footpath along Glasgow Road, but there are no cycle paths along the road. However, there are local facilities than can be accessed via walking.</p> <p><b>P4:</b> The site could create a social space as part of the development.</p>	<p><b>S1:</b> The site is located on brownfield land and this should be supported, however it may not be as sustainable as some of the greenfield sites in terms of local facilities.</p>	<p><b>W1:</b> The status of water bodies is unknown .</p> <p><b>W2:</b> Part of the site is in a river high risk flooding area, but this could be mitigated through design.</p>	<p><b>A1:</b> The site is adjacent to Edinburgh Gateway station, tram station and bus stops which provide regular services to Edinburgh centre and the surrounding area. Unsure why the council has rated this as negative.</p> <p><b>A2:</b> The site isn't located on a national cycle route but there is a footpath along Glasgow Road, but there are no cycle paths along the road but local facilities can be easily accessed via walking.</p> <p><b>A3:</b> The site is not located in a AQMA area, according to the council's environment study map provided.</p> <p><b>A4:</b> Part of the site is in a river high risk flooding area, but this could be mitigated through design.</p>	<p><b>M1:</b> The site could provide open space within it and the site is brownfield so it would improve open space.</p> <p><b>M2:</b> There isn't a large amount of open space to provide access therefore the effect is neutral.</p>	<p><b>H1:</b> There area 2 Category A buildings (Castle Gogar) and a Category B (Castle Gogary Bridge) adjacent to the site so these would need to be carefully mitigated.</p> <p><b>H2:</b> There are no Scheduled Ancient Monuments on the site.</p> <p><b>H3:</b> The site is not located within a conservation area.</p> <p><b>H4:</b> Agree with councils ranking that the site does not have an effect on the outstanding value of the World Heritage Sites.</p> <p><b>H5:</b> Agree with councils ranking that the site does not have significant effects on Historic Gardens and Designed Landscapes.</p> <p><b>H6:</b> Unknown if there are</p>	<p><b>L1:</b> Disagree with the council as the site does not contribute to the landscape setting.</p> <p><b>L2:</b> n/a as the site is not within the Green Belt</p> <p><b>L3:</b> There is a SLA on the opposite side of Glasgow Road so this would have to be carefully mitigated but development in this area is unlikely to be harmful.</p> <p><b>L4:</b> Potential links to the surrounding area which is partially rural and urban.</p>

**EDINBURGH CHOICES FOR CITY PLAN - ENVIRONMENTAL ASSESSMENT SUMMARY TABLE (COUNCIL AND PEGASUS GROUP SITE ASSESSMENTS)**

Site Name	Env. Code	Biodiversity					Population				Soil	Water		Air & Climate				Material Assets		Heritage						Landscape				Site Score	Collated Council	Collated Pegasus
		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			
South Riccarton	Council	Not Assessed					N/A				N/A	N/A		N/A				N/A		N/A						N/A				N/A	N/A	29
	Pegasus	1	1	1	1	1	1	1	2	1	-1	0	1	2	2	1	1	1	2	1	1	1	1	1	0	1	2	1	1	29	N/A	29
East of Riccarton	Council	-	X	?	?	-	-	-	X	?	X	?	?	-	-	?	X	-	Y	X	X	?	-	-	X	-	-	?	-	7	7	27
	Pegasus	1	1	1	1	1	1	1	2	1	-1	0	1	2	2	1	1	1	2	1	1	1	1	1	0	1	2	-1	1	27	7	27
Carlowrie Castle (Kirkliston)	Council	-	X	?	?	-	X	-	-	?	X	?	?	X	X	?	X	-	-	X	-	-	-	-	X	-	X	-	-	4	9.75	15.75
	Pegasus	1	1	1	1	1	1	1	-1	1	-1	0	1	-1	-1	1	1	1	2	1	1	1	1	1	0	1	1	1	1	19		
Craigbrae (Kirkliston)	Council	-	-	-	?	-	X	-	-	-	X	-	-	X	X	?	X	-	-	X	-	-	-	-	X	-	X	-	-	10		
	Pegasus	1	-1	1	1	1	-1	1	-1	1	-1	0	1	-1	-1	1	1	1	1	1	1	1	1	1	0	1	1	1	1	14		
Conifox (Kirkliston)	Council	-	-	-	?	-	-	-	-	?	X	?	?	X	X	?	X	-	-	X	-	-	-	-	-	-	-	-	-	13		
	Pegasus	1	-1	1	1	1	-1	1	-1	1	-1	0	-1	-1	-1	1	-1	1	1	1	1	1	1	1	0	1	1	1	1	10		
North Kirkliston (Kirkliston)	Council	-	-	-	-	-	?	-	X	X	X	-	-	X	-	?	X	-	X	-	-	-	-	-	X	-	-	-	-	12		
	Pegasus	1	1	1	1	1	1	1	-1	1	-1	0	1	-1	-1	1	1	1	2	1	1	1	1	1	0	1	2	1	1	20		
Norton Park (West Edinburgh)	Council	-	-	?	?	?	-	-	X	-	X	?	?	-	-	?	X	-	-	X	X	-	-	-	-	-	-	?	-	11		
	Pegasus	1	1	1	1	1	1	1	1	1	-1	0	1	1	-1	0	1	1	2	1	-1	1	1	1	0	1	1	-1	1	18		
Overshiel (Calderwood)	Council	-	?	?	-	?	-	-	-	-	X	-	-	X	X	?	X	-	X	?	-	-	-	-	X	-	-	X	-	9		
	Pegasus	1	-1	1	1	-1	1	1	-1	1	-1	0	1	-1	-1	1	1	1	1	1	1	1	1	1	0	1	-1	1	1	12		
Bonnington (Calderwood)	Council	-	-	?	?	?	X	-	X	-	X	?	?	X	X	?	X	-	X	X	-	-	-	-	-	-	X	X	-	2		
	Pegasus	1	1	1	1	-1	1	1	-1	1	-1	0	1	-1	-1	1	1	1	1	1	1	1	1	1	0	1	-1	-1	1	12		
Crosswinds	Council	-	?	-	-	-	-	-	-	?	Y	?	?	X	-	-	X	-	-	?	-	-	-	-	-	X	-	-	-	18		
	Pegasus	1	1	1	1	1	-1	1	2	1	2	0	1	2	2	1	1	1	1	1	1	1	1	1	0	1	1	1	1	28		

Council's Assessment	Pegasus scoring
Significant positive effect (Y)	Positive (2)
Significant negative effect (X)	Negative (-1)
Uncertain (?)	Unknown (0)
Neutral / No significant effect (-)	Neutral (1)

---

**APPENDIX 4 – GOVERNMENT REPORT – EDUCATION DEVELOPER CONTRIBUTIONS**



The Chief Planner  
Scottish Government

I refer to your letter of 29 November 2018 to the Interim Chief Reporter requesting a report from the Directorate of Planning and Environmental Appeals on the City of Edinburgh Council's intention to adopt its Supplementary Guidance on Developer Contributions and Infrastructure Delivery. My report is attached.

You [wrote separately to the council](#) to inform them of the preparation of this report. You stated in that letter that the reporter will be responsible for deciding whether any additional information and evidence is required to prepare the report.

Your officials provided me with the package of information provided by the council when it informed you by email on 7 September 2018 of its intention to adopt the supplementary guidance. This included:

- the version of the supplementary guidance which the council intends to adopt
- a summary of the representations received on the consultation draft and of the council's response to these
- a list of changes between the consultation and final drafts of the supplementary guidance, and
- a statement of conformity with the tests for planning obligations which are set out in Circular 3/2012: Planning Obligations and Good Neighbour Agreements.

The council's email also contained links to its appraisals on transport, education and primary care infrastructure which have informed the supplementary guidance, and to the action programme for the local development plan.

I have had regard to all of the above information in preparing my report. In addition to these materials I have also had reference to other evidence in the public domain such as the local development plan itself, its examination report, relevant legislation, Scottish Planning Policy and government circulars – I refer to these in the report as appropriate. Your officials sent me a number of other emails they have received by various parties (all or most of whom made representations on the consultation draft) about the supplementary guidance. However, these do not appear to raise any significant new issues which are not already raised in the consultation responses summarised by the council. In any event, I have taken no account of this additional correspondence in preparing my report. I have not had regard to the various appeal decisions which are referred to by some respondents and by the council, since these relate to the circumstances of individual planning applications rather than to the process of preparing the supplementary guidance itself.

I decided not to seek any further submissions from the council or those who made representations during the consultation process, although this would remain an option

should Ministers wish further evidence before deciding how to respond to the council's notification. This is because the material I have read is in my view sufficient to allow me to report back on the three specific matters you asked for the report to address. There are certain issues on which I cannot give a definitive and well-informed view, but that would likely still have been the case unless I sought very detailed additional evidence from parties. I do not think each and every issue raised in representations need be fully answered in order for me to respond in a proportionate manner to your request.

You requested that my report set out the following:

1. The consultation undertaken to date, and the way that views have been taken into account by the City of Edinburgh Council.
2. The methodology used to calculate contributions for education infrastructure.
3. Compliance of the supplementary guidance with Circular 3/2012.

In respect of the first element, I am aware that there has been more than one consultation draft of the supplementary guidance. But I restrict myself to the consultation on the most recent draft, as that is what the council's summary of the consultation responses relates to. In covering both the first and the third elements, I am required to look further than into the methodology for education contributions and to consider also, in particular, the approach in the guidance to both transport and healthcare contributions.

I have found it easiest to structure my report by considering generic, cross-cutting issues first and then considering the approach in the guidance to education, transport and healthcare contributions in turn. I return at the end to conclude on the 3 elements you ask me to consider. I do not address each of the representations one by one, but rather focus on what seem to me to be the main issues raised by the consultation process and by the approaches adopted in the supplementary guidance. The sub-headings in each chapter are based largely on the main issues raised in the consultation responses. For ease of reference, I have appended your letter to the end of my report.

*David Liddell*  
Principal Reporter

29 January 2019

<b>CONTENTS</b>	<b>PAGE</b>
<b>1 GENERAL AND CROSS-CUTTING ISSUES</b>	<b>4</b>
Does the level of contributions undermine development viability?	4
Should the guidance mention other funding sources?	4
The council's role – carrying risk for infrastructure provision	4
Is more infrastructure needed to make up housing shortfall?	6
Dealing with windfall development	6
Can the council re-assign contributions to a different infrastructure intervention?	8
Is the content of the guidance sufficiently grounded in the local development plan?	8
Does/should the guidance provide certainty about the contributions expected from sites?	14
Amending the zones, actions and contributions in the guidance	18
Section 75 agreements must restrict or regulate the development or use of land	18
Format and clarity of the supplementary guidance	18
<b>2 EDUCATION CONTRIBUTIONS</b>	<b>19</b>
The evidence for the need for contributions	19
The justification for the approach in each zone	21
Should contributions be levied only for the catchment school(s) for a development?	22
Should school capacity be 'first come first serve'?	22
Assumptions about travel to school thresholds	22
Land and development costs for new schools	23
Pupil Generation Rates	23
Retaining contributions for 30 years	24
7.5% contingency costs	24
<b>3 TRANSPORT CONTRIBUTIONS</b>	<b>25</b>
The evidence base	25
Which categories of development are covered by the cumulative contribution zones?	32
Cumulative assessment in transport appraisals	32
Exemptions from making contributions	32
Trams	32
<b>4 HEALTHCARE CONTRIBUTIONS</b>	<b>34</b>
The principle of developer contributions for healthcare infrastructure	34
The evidence base	34
Catchment areas	37
Costs	37
Developer contributions for private businesses/practices	38
<b>5 CONCLUSIONS</b>	<b>39</b>

# **1 GENERAL AND CROSS-CUTTING ISSUES**

## **Does the level of contributions undermine development viability?**

1.1 Several respondents to the consultation raise this issue, both about this supplementary guidance but also more generally across Scotland. The difficulties in raising capital, combined with the size of contributions required, are said to threaten viability. Forth Ports states that the contributions sought in the guidance would render any further development of its land at Western Harbour, beyond the extant permission, unviable.

1.2 I return below to the justification for the level of contributions for education, transport and healthcare infrastructure. But as to whether what is being sought, for any particular development or for development more generally, would threaten its viability, I do not have before me the kind of detailed financial information that would demonstrate this. I do note, however, that section 3 of the guidance deals with viability and funding mechanisms and provides for the possibility of contributions being varied or even waived where there are abnormally high site preparation costs which threaten the viability of a development.

1.3 It is also stated that the costs of some items have increased during the time it has taken to progress the supplementary guidance to this point, and that it is unfair that developers should have to meet these increased costs. However, as the council points out, contributions for new infrastructure would naturally need to be based on the relevant costs at the time and costs in the guidance would anyway be subject to future inflation and (perhaps) revision. I do not find that any delay in adopting the guidance provides a strong reason for departing, now, from the principal of basing contributions on up to date assessments of costs.

## **Should the guidance mention other funding sources?**

1.4 Alternative sources of funds, such as the City Deal, are referred to by some respondents. It is argued that the guidance should highlight these, setting out when they can be utilised and ensuring developer contributions are therefore only sought when necessary. Section 3 of the guidance refers to the possibility of gap or forward funding being available in the event of viability concerns, and also that such funding may be required to deliver infrastructure projects in the action programme. The council says that, given the uncertainty in City Deal and other funding sources, it would be inappropriate to provide further detail in the supplementary guidance.

1.5 I do not think it is essential for the guidance to rehearse the circumstances where some other potential, currently unconfirmed, source of funding might reduce or remove the need for a contribution. Nor is the guidance the place to set out how and where money from other funding streams (like the City Deal), which would be subject to separate governance regimes, ought to be spent.

## **The council's role – carrying risk for infrastructure provision**

1.6 However I think it would have been open to the council to provide some further information in the guidance about alternative sources of funding – albeit these may be subject to change. It is noted by several respondents that the council gave a commitment during a hearing session of the local development plan examination that infrastructure

constraints would not be allowed to delay development. In allowing the plan to be adopted, the Minister wrote

'In part, I am reassured by the published statement that: "At the hearing the Council explained that it would carry the risk of the required infrastructure provision and this would not delay development" (Examination Report page 146 paragraph 96). I expect to see this assurance carried through to future decision making.'

1.7 Respondents want the guidance to re-affirm this commitment, confirming that the council will carry the risk of the required infrastructure provision so that development would not be delayed. The statement in the guidance that development should only progress subject to sufficient infrastructure being available/to be delivered is said to be contrary to such a commitment, as is the approach to the timing/phasing of education provision. There are also requests that the council should commit to front-funding infrastructure and then recoup the costs from developer contributions.

1.8 It is worth at this point noting some of the relevant content from the local development plan itself. Paragraph 103 explains that developer contributions are sought to enable the delivery of infrastructure at the appropriate time. Policy Del 1 says that 'development should only progress subject to sufficient infrastructure already being available or where it is demonstrated that it can be delivered at the appropriate time.'

1.9 The supplementary guidance repeats the above statement. When it comes to education provision, paragraph E of the guidance says that development should only progress where it is demonstrated that required education infrastructure can be delivered at the appropriate time. Paragraph F says that conditions may be used to phase development in line with the provision of new infrastructure. These statements seem to me to be entirely consistent with the principle established in the extract from policy Del 1 which I quote above.

1.10 However, paragraph 105 of the local development plan highlights the need for developer contributions to be realistic so that they do not impede development, stresses the importance of increasing the rate of new house completions, and says that mechanisms for forward and gap funding may also have to be considered. The following paragraph in the plan goes on to say that the supplementary guidance is to 'address the detail of these matters'. Policy Del 1 itself says that the guidance is, amongst other things, to provide guidance on the approach to the timely delivery of the required infrastructure and of the council's approach should the required contributions raise demonstrable viability concerns and/or where forward or gap funding may be required. Paragraph 143 of the local development plan says that the supplementary guidance will include 'possible approaches to forward and gap funding'. I am also mindful of the council's commitment (as relayed in the examination report) and of that reporter's expectation (page 763, paragraph 37) that the supplementary guidance would provide further clarity and detail in relation to the need for forward and gap funding.

1.11 In this context, I can well understand why there is disappointment from some respondents that the supplementary guidance does not provide more detail about how the council will aim to ensure that the provision of infrastructure will not unduly delay the progress of development. Section 3 does, as I note above, acknowledge that funding gaps may occur, but it does not say what would, could or may be done in response. It does not explain what the council's quoted commitment that 'it would carry the risk of the required

infrastructure provision and this would not delay development' would mean in practice. In this respect, my view is that the supplementary guidance falls short of what would reasonably have been expected on the basis of the contents of the local development plan (in particular policy Del 1) and the examination report. In responding to one representation, the council refers to £35m of potential capital funding for action programme projects to be used to front fund infrastructure in advance of the collection of developer contributions, yet there is no mention of this (or of how such an approach would work) in the supplementary guidance itself.

### **Is more infrastructure needed to make up housing shortfall?**

1.12 Conversely to arguing that too much is being sought through developer contributions, some development interests have also argued that the council's assessments of infrastructure requirements do not take into account the full extent of new infrastructure needed to make up the shortfall in housing completions. The concern is that further development (on unallocated sites) will now be rejected on the basis that there is no infrastructure to support them, it all being required for the allocated sites.

1.13 In responding, the council says that the infrastructure identified in the action programme is sufficient to support delivery of all the sites in the adopted local development plan, all other sites in the established housing land supply and other urban land with potential for housing development. I do not have information on the current position of the effective housing land supply. But regardless of that, I am not convinced it would be necessary for the supplementary guidance to plan for infrastructure provision to support development on (unidentified) sites beyond those categories the council has listed. To do so would seem to be at odds with a plan-led system, and it is not clear to me how it could be done effectively without knowing which sites to incorporate. Policy Hou 1 of the local development plan provides the basis for considering the infrastructure requirements for housing proposals on unallocated sites, pointing to the need to consider policies Del 1 (and its supplementary guidance) and Tra 8. For education infrastructure at least, paragraph C(ii) in part 2a of the supplementary guidance covers the arrangements for other sites not in the established supply. I do note, however, that some of the transport contribution zones for South East Edinburgh do seem to allow for the possibility of further greenfield releases there, on sites identified in the transport appraisal addendum as being amongst those which might come forward as further development proposals.

### **Dealing with windfall development**

1.14 Related to the issue above, questions are raised about how windfall sites (or increases in the capacity of allocated sites) would affect the arrangements for developer contributions. So, for example, if a number of sites in a zone are together to pay for an infrastructure intervention (like a school extension), what is the impact on these arrangements of a wholly new site being given planning permission within the same zone? Could these arrangements, as set out in the guidance, need to change as a result of a nearby windfall site gaining permission? One respondent suggested that windfall sites should be treated on a standalone basis rather than being required to make the contributions set out in the guidance.

1.15 The council responds by referring to paragraph C of part 2a of the guidance (the part dealing with education contributions). This says that if the education infrastructure interventions identified in the current action programme are sufficient to accommodate the

increase in pupil numbers, then the established 'per house' and 'per flat' rates would be applied to non-allocated sites. However if the identified infrastructure interventions would not be sufficient, then the council would consider whether these (and the associated contribution zones) need to be revised. If the established contribution rates would not cover the cost of the revised interventions, the developer of the new site would need to make up the difference.

1.16 The council also points to an intention to review the action programme on an annual basis, giving an opportunity to revise the infrastructure interventions and the associated costs (a point I return to below).

1.17 As I note above, the interventions and contributions in the guidance are based on assumed numbers of houses from allocated sites, sites in the housing land audit and other urban land considered to have capacity for development. Therefore the question is about how 'other' sites (greenfield sites or perhaps other urban sites not accounted for, or increases in the capacity of allocated sites) would be treated.

1.18 Assumptions about the rate of new housing development, the capacity of sites and future school rolls are, of course, subject to uncertainty and future change. An approach which seeks to set out a set of infrastructure interventions and mechanisms for developer contributions based on such assumptions needs to recognise that. Even without new sites, this is not an exact science, and there must be an expectation from all parties that some variation can be tolerated without revisiting the interventions and/or contributions. So it seems reasonable for the guidance to take the position that, unless it is necessary to make new arrangements, new sites and variations in site capacity can proceed on the basis of established interventions and contributions.

1.19 But what happens when revisions to interventions and contributions would be required as a result of a windfall development? The guidance puts the additional costs (if there are any) of any new arrangements for education infrastructure on the windfall development, so there should be no additional costs for the established sites. Therefore I assume (to be consistent with that approach) that it is not the intention that any new contribution zone or sub-area would apply to already established sites. The guidance does not clearly set this out however.

1.20 It is not stated, but I presume that the council would want to ensure that, when new arrangements are required, this does not cause any significant delay to the progress of established sites.

1.21 A question is raised as to whether, if a windfall development comes along and makes a contribution to, say, a school extension already identified in the guidance, the contributions from the established developments can be reduced accordingly. The guidance says (in part 4) that section 75 agreements can make provision for the repayment of unused contributions, and this would seem applicable to this kind of circumstance.

## **Can the council re-assign contributions to a different infrastructure intervention?**

1.22 At part 4 of the guidance it is stated that:

'Whilst contributions may be required towards the delivery of a number of actions within a Zone, the Council may apportion money received from a particular development site to the delivery of infrastructure actions that have been prioritised in order to support early phases of development. Remaining or future moneys will then be used for the delivery of other actions set out within the Action Programme.'

1.23 So, for example, a hypothetical development may need to contribute, under the terms of the guidance, towards the costs of a primary school extension, a secondary school extension, a GP surgery and a junction improvement. My reading of the above extract is that where, say, the junction improvement is the most pressing intervention to allow development to proceed, all of the contribution from that development could be put towards it. Later developments in the same contribution zones would then make the contributions towards the other, less pressing interventions.

1.24 However, respondents contend that the sums received through developer contributions can only be used for the purpose for which they are sought, and otherwise should be returned. More clarity/justification is sought on the proposed approach.

1.25 The approach proposed by the council aims to help facilitate the delivery of the sites identified in the local development plan, and in that respect is to be commended. However, I have doubts about whether such an approach would accord with Circular 3/2012, and the necessary tests which are to apply to all planning obligations. It would seem to be taking funds raised for one purpose and spending them on a different one, even if on a piece of infrastructure which is required as the cumulative result of development, including the one in question.

## **Is the content of the guidance sufficiently grounded in the local development plan?**

1.26 In considering this question, it will be helpful to outline the relevant parts of the local development plan.

1.27 Paragraphs 103 to 106 of the local development plan explain that part of the approach to obtaining developer contributions will be through cumulative contribution zones. These are to be within defined areas for schools, transport infrastructure, public realm and greenspace actions, to be based on the transport and education appraisals and the council's open space strategy. The zones are to be mapped through the supplementary guidance. This is to enable a clear understanding of what is required at the outset, provide the basis for the approach to developer contributions and set a clear foundation for the action programme (that to be updated annually). Paragraph 141 again refers to the transport and schools requirements being set out in Part 1 Section 5 of the plan, and also refers to Annex C as detailing the provisions for which contributions would be sought. Paragraph 145 states that there was at that time a lack of information on the scale of healthcare contributions and how they should be addressed, and that consequently any contributions for these would need to be considered on a case by case basis where a clear justification can be provided.

1.28 Policy Del 1 sets out in more detail the basis for the contributions to be included in the supplementary guidance:

- Transport infrastructure may include the infrastructure from Figure 2 of SESplan, the transport proposals in Table 9 of the local development plan, and the interventions specified in Part 1 Section 5 of the plan.
- Education infrastructure may include the new school proposals in Table 5 of the local development plan, and the potential school extensions in Part 1 Section 5 of the plan.
- Green space infrastructure may be as required by policies Hou 3, Env 18, 19 or 20.
- Public realm infrastructure and other pedestrian and cycle actions will be in the council's public realm strategy or noted as a site-specific action.
- Cumulative contribution zones will be established for education and transport infrastructure, and contribution zones for other actions will be established if they are relevant to more than one site

1.29 The supplementary guidance is to provide guidance on the required infrastructure in relation to specific sites and/or areas and the mapping of the cumulative contribution zones. It was acknowledged in the local development plan that the guidance may come too early to incorporate the findings of the Cumulative Impact Transport and Land Use Appraisal Working Group.

1.30 In the examination report (under Issue 21) the reporter's understanding (paragraph 7) was that 'it would not be appropriate to introduce new matters through the Action Programme or specify additional items of infrastructure or the means through which they are to be delivered without first establishing these through the development plan'. She also refers to Circular 6/2013 Development Planning which states that supplementary guidance should not include items for which financial or other contributions, including affordable housing, will be sought and the circumstances, locations and types of development where they will be sought - these instead being matters to be addressed in the plan itself.

1.31 The reporter goes on to note (paragraph 27) that paragraph 121 of SESplan states that mechanisms for calculating levels of contribution should be included in supplementary guidance in a way that assists landowners and developers. She considered (paragraph 30) that policy Del 1 should establish the broad principles, including the items (generally) for which contributions will be sought and the occasions when they will be sought. The supplementary guidance should establish the methods and exact levels of contributions. Changes to the plan were needed so that (paragraph 32) the likely scope of required mitigation relevant to specific areas and the need for further assessment is more transparent, enabling (paragraph 34) a direct link between policy Del 1 and the area specific mitigation and setting the parameters for the supplementary guidance.

1.32 The reporter's recommended modifications included General Development Principles relating to the scope of the required infrastructure provision in each of the main development areas, based on the initial assessment carried out by the council in its education and transport appraisals. More detailed assessment of these matters would be required through the preparation of the supplementary guidance, the cross-boundary transport study and through the master-planning/development management process for major developments. The General Development Principles are said to be referenced in the context of initial appraisals to provide some flexibility and scope for further refinement.

1.33 The examination report states that the plan should explain the nature of contribution zones and how these would apply. The contribution zones should, it is said, be identified in supplementary guidance, not the action programme, which should not introduce new matters or approaches which are not established through the development plan.

1.34 Since no research or justification for seeking contributions towards health care provision was presented to the examination, the conclusion was that the list of items relevant to Policy Del 1 should not include healthcare.

1.35 In the light of the above, in particular with regard to the contents of the local development plan itself, but having due regard to what is set out in the examination report, I think it is useful to consider the following questions, all of which are reflected in one or more of the representations on the draft guidance:

1. To what extent does the approach set out in the guidance (the zones identified and the interventions for which contributions are required) reflect what is set out in the relevant sections of the plan itself?
2. To what extent does (and should) the guidance provide certainty as to the contributions expected from each development site?
3. What is the appropriate means by which the zones, actions and contributions in the guidance can be amended, if need be, in the future?

### Education contributions

1.36 On the first of these questions, in respect of the education zones, the local development plan identifies the need for cumulative contributions in South East, South West and West Edinburgh, and in South Queensferry. Although the precise extent of the zones is not defined, this is clearly not city-wide.

1.37 The supplementary guidance identifies contribution zones, based on secondary school catchments (sometimes multiples thereof) across the whole of the city, albeit within parts of some of these zones no contributions are required. Therefore the geographical extent of the cumulative education contribution zones has been expanded from that foreshadowed in the local development plan. I summarise this below for each of the zones in the guidance, in the order they are presented:

**Boroughmuir/James Gillespies** – No cumulative contribution zone identified in the local development plan. Cumulative contributions required in the supplementary guidance for additional secondary and primary school capacity which are not identified in the plan.

**Castlebrae** – Part of the South East Edinburgh zone in the plan. Cumulative contributions in the supplementary guidance towards capacity at Castlebrae High School and a new Brunstone primary school, all identified in the plan. Cumulative contributions required towards capacity at Castlevie Primary School which are not identified in the plan.

**Craigroyston/Broughton** – No cumulative contribution zone identified in the plan. Cumulative contributions required by the supplementary guidance towards new non-denominational secondary school capacity and Roman Catholic primary school capacity which are not identified in the plan. Cumulative contributions also required

towards capacity at St Augustine's High School (these reflect the same contributions also required in the South Queensferry and West Edinburgh zones).

**Drummond** – No cumulative contribution zone identified in the plan. Cumulative contributions required by the supplementary guidance to primary school capacity which are not identified in the plan.

**Firhill** – No cumulative contribution zone identified in the plan. Cumulative contributions required by the supplementary guidance to capacity at Firhill Primary School which are not identified in the plan. Cumulative contributions also required towards capacity at St Augustine's High School (these reflect the same contributions also required in the South Queensferry and West Edinburgh zones).

**Leith/Trinity** – No cumulative contribution zone identified in the plan. Cumulative contributions required by the supplementary guidance towards additional capacity at Leith/Trinity Academies and Holycross Primary School which are not identified in the plan. Cumulative contributions also required towards a new Victoria Primary School. This is proposal SCH5 in the plan.

**Liberton/Gracemount** – Part of the South East Edinburgh zone in the plan. Cumulative contributions required by the supplementary guidance for several schools, all of which are identified requirements in the plan.

**Portobello** – No cumulative contribution zone identified in the plan. Cumulative contributions required by the supplementary guidance towards new primary school capacity which are not identified in the plan.

**Queensferry** – Queensferry development zone identified in the plan. Cumulative contributions required by the supplementary guidance for several schools, all of which are identified requirements in the plan.

**South West** – A South West development zone is identified in the plan. Cumulative contributions required by the supplementary guidance for additional capacity at Currie Primary School, as identified in the plan. Cumulative contributions also required in the supplementary guidance for additional capacity at Dean Park Primary School, which are not identified in the plan.

**Tynecastle** – No cumulative contribution zone identified in the plan. Cumulative contributions required by the supplementary guidance towards additional capacity at Balgreen Primary School which are not identified in the plan. Cumulative contributions also required towards capacity at St Augustine's High School (these reflect the same contributions also required in the South Queensferry and West Edinburgh zones).

**West** – West Edinburgh development zone identified in the plan. Cumulative contributions required by the supplementary guidance for several schools, all of which are identified requirements in the plan.

1.38 The various additional cumulative contributions identified in the supplementary guidance derive from the requirements set out in the latest version of the council's education appraisal. Respondents make comment on the quality of the evidence base

which this provides as justification for the contributions now required, and I return to that matter below. But the more general question to consider first is whether the extent of cumulative contributions now being sought through the supplementary guidance is sufficiently grounded in the local development plan itself, in the context of the sections of the plan I refer to above.

### Transport contributions

1.39 I turn now to the extent to which the approach to the cumulative transport contributions zones has been foreshadowed in the local development plan:

**Tram** - Proposal T1 in the plan safeguards land for long term extensions of the Edinburgh Tram to the waterfront, the south east, and Newbridge. Tram lines 1a, 1b and 1c are identified in SESplan Figure 1. Policy Del 1 provides for contributions to the existing and proposed tram network to be set out in the supplementary guidance. Paragraph 142 states that the council has already forward funded the completed section of the tram network and contributions will continue to be sought from future development which impacts on or creates a need for this infrastructure. On this basis the supplementary guidance maps the tram contribution zone based on distance to the tram line (existing and proposed) and stops, and a table is used to calculate contributions based on size and type of development and distance from the line/stops.

**Burdiehouse Junction** – within the South East Edinburgh development zone identified in the plan. Action T20, and the need for contributions referenced at page 65.

**Calder and Hermiston** – the South West Edinburgh sites are located in the southern part of the zone now identified. No reference to this action in the local development plan.

**Gilmerton Crossroads** – within the South East Edinburgh development zone identified in the plan. Action T19, and the need for contributions referenced at page 65.

**Straiton Junction** – within the South East Edinburgh development zone identified in the plan. Identified in Figure 2 of SESplan, and the need for contributions referenced at page 65 of the local development plan.

**Gilmerton Station Road/Drum Street** – within the South East Edinburgh development zone identified in the plan. Page 66 identifies 'Access and parking strategy for Drum Street' and 'junction improvement' at this location is noted on the map on page 71.

**Hermiston Park & Ride** – the South West Edinburgh sites are located in the southern part of the zone now identified. Need for contributions referenced on page 80 of the plan.

**Gillespie Crossroads** – Need for contributions referenced on page 80 of the plan.

**Lasswade Road/Gilmerton Dykes Street/Captain's Road** – within the South East Edinburgh development zone. Not referenced at page 65/66 of the plan or shown on the map on page 67. But need for junction improvements identified for site HSG39 on page 69.

**Lasswade Road/Lang Loan** – within the South East Edinburgh development zone. Not referenced at page 65/66 but shown as 'junction improvement' on map on page 67.

**Maybury/Barnton** – at the edge of the West Edinburgh development zone. Actions identified as proposals T16-18 in the plan and identified on pages 57 and 58 (map).

**Queensferry** – fairly near the South Queensferry development sites and identified on page 81 of the plan.

**South East Edinburgh (North)** – at the edge of the South East Edinburgh development zone, although Old Craighall junction is outwith it, in East Lothian. Identified in SESplan Figure 2 and on page 66 of the local development plan.

**Sheriffhall** – at the edge of the South East Edinburgh development zone. Identified in SESplan Figure 2 and as proposal T13 of the local development plan. Not referenced on pages 65/66 or shown on maps of the development sites.

**West Edinburgh** – Actions identified in SESplan Figure 2 and proposals T8-12 of the local development plan (also on page 57 although the reference numbers there are wrong). There is, for this zone, a separate page detailing total cumulative developer contributions amounting to £86m. There is also, it is said, a spreadsheet which would allow detailed calculation of the contributions required in each case, and the West Edinburgh Transport Assessment provides further background about the actions identified.

**Roseburn to Union Canal** – No contribution zone in the plan. Action is part of proposal T7 on the proposals map.

1.40 It can be seen then that the suite of transport infrastructure actions towards which cumulative contributions are sought is, though not identical to the zones and actions identified in the local development plan, more closely based on the details in the plan than is the case for cumulative education contributions.

### Healthcare contributions

1.41 I turn now to the healthcare infrastructure contribution zones. To recap on what I note above, the first part of policy Del 1 sets out the types of infrastructure provision which development proposals may be required to contribute to as a result of their impacts, either individually or cumulatively, and for which contribution zones may be established. Healthcare infrastructure is not one of these. The second part of the policy identifies these same types of infrastructure provision to be covered in the supplementary guidance. Again, healthcare infrastructure is not listed, nor is it listed in paragraph 104 of the plan which also refers to the supplementary guidance. Paragraph 145 says that the need for contributions towards other types of infrastructure, including health and community facilities, would need to be considered on a case by case basis, with policy Hou 10 being relevant.

1.42 On this basis, I do not see a strong grounding in the local development plan for the inclusion of cumulative contribution zones for healthcare infrastructure in the supplementary guidance. At paragraph 47 of Issue 21 (page 764) of the examination report, the reporter said the list of items relevant to policy Del 1 should not include health care infrastructure. I also note that, although healthcare infrastructure is listed in Appendix C of the plan as one of the types of infrastructure for which contributions may be sought, this appears to be at odds with the recommendations in the examination report (page 776) for this table, where healthcare infrastructure is not included.

1.43 I would also note that Regulation 27(2) of the Town and Country Planning (Development Planning) (Scotland) Regulations 2008 says that supplementary guidance 'may only deal with the provision of further information or detail in respect of the policies or proposals set out in that plan and then only provided that those are matters which are expressly identified in a statement contained in the plan as matters which are to be dealt with in supplementary guidance'.

#### Other contributions

1.44 For greenspace, Policy Del 1 says that contributions may be payable towards actions if required by Policy Hou 3, Env 18, 19 or 20. Contribution zones may be established where provision is relevant to more than one site. Only one cumulative contribution zone (South East Wedge/Little France) is identified in the supplementary guidance. This is action GS4 in the local development plan and is shown on the map on page 72.

1.45 For public realm, Policy Del 1 says that contributions may be required towards public realm and other pedestrian and cycle actions where these are identified in the council's public realm strategy or as a site specific action. Contribution zones may be established where provision is relevant to more than one site.

1.46 The supplementary guidance says that a new process is being developed to set priorities for public realm investment. The public realm annex to the guidance is to be updated (in fact provided for the first time) after this process is complete. It is not stated whether this will result in standard charges or a suite of contribution zones for public realm interventions. In the meantime, public realm contributions will not be pursued.

#### **Does/should the guidance provide certainty about the contributions expected from sites?**

1.47 This is the second of the three questions I identify at paragraph 1.35 above. Some respondents highlight what they see as gaps in the detail of the contribution zones, infrastructure interventions, costs and levels of contributions.

1.48 In respect of education infrastructure, the guidance shows which zone any development site would be in, sets out the infrastructure interventions required for each school (albeit in some cases there is more than one option for these), and sets a precise figure for the contribution per house or flat, as well as, where relevant, an allowance for land costs for new schools. In this respect, and on its face, the guidance provides a high degree of certainty about what is required.

1.49 At paragraph C(i) on page 4 it is stated that ‘if appropriate education infrastructure actions are identified in the current Action Programme, the contribution will be based on the established ‘per house’ and ‘per flat’ rate for the appropriate part of the Zone’. But there are actions for each zone in the supplementary guidance itself. Since that is based on the education appraisal (which in turn is based on the local development plan allocations and other sites with established development potential) I assume the intention is that, for such sites, the actions identified in the guidance itself ought to remain appropriate. But this statement does allow for the possibility that, for an allocated site, the required intervention(s) may be different from the one(s) identified in the guidance.

1.50 Paragraph C(ii) sets out what happens if the actions identified in the action programme are not sufficient to accommodate the cumulative increase in pupil numbers. This seems intended to cover the circumstances where new, unforeseen development sites emerge. My understanding is that such sites would contribute either on the same per unit basis as set out in the guidance or, if this is insufficient to provide the necessary school capacity required as a result of the additional site, a greater contribution may be required. I cover this ground at paragraphs 1.19 to 1.21 above. Although this provides less certainty about the contributions from any such ‘new’ sites, it seems a reasonable and plan-led approach.

1.51 I note that the costs for each of the education infrastructure interventions given in the supplementary guidance are indicative. Each has yet to be confirmed, and so they could vary from place to place. In responding to this point, the council says that the information on the costs of each action would be kept up to date through the action programme, along with further information about how they have been arrived at. However, Circular 3/2012 (paragraph 32) says that ‘methods and exact levels of contributions should be included in statutory supplementary guidance’. Paragraph 35 of that circular says that ‘where planning authorities propose to rely on standard charges and formulae, they should include these in supplementary guidance along with information on how standard charges have been calculated’. Circular 6/2013 contains advice along similar lines. Therefore albeit the action programme could provide different costs for the various education infrastructure interventions, it seems to me that, if following the advice in the circulars, any changes to the standard levels of contributions should be made through updates to the supplementary guidance itself. The council notes that Section 75 agreements can make provision for the repayment of costs, and applications can be made to vary such agreements through section 75A of the Act. These may provide mechanisms for the adjustment of contributions should they be shown to have been higher than was necessary.

1.52 There are more notable gaps in the information provided for transport contributions. Some of these gaps are presumably because, whilst the Cumulative Impact Transport and Land Use Appraisal Working Group has published its findings the resultant required interventions (and their costs) have not yet been confirmed. It is acknowledged in the local development plan that the supplementary guidance might come too early for the results of this work to be included. However I would have found it helpful, when reading the guidance itself, for some further explanation of the current position, and when and how these interventions are to be confirmed. I outline below the certainty and comprehensiveness of the information for each of the transport contribution zones in turn:

**Tram** – the map and table provide a comprehensive approach for calculating the contributions from developments within the zone, albeit any contributions necessary

from major developments outwith the zone are to be considered on a case by case basis.

**Burdiehouse Junction** – identified as ‘junction upgrade’ in the supplementary guidance. Cost given, and apportioned on a pro-rata basis (based on the expected number of units) to three allocated housing sites within the zone.

**Calder and Hermiston** – details of action and cost still to be established (although it appears from the zone map that the intention is for Microprocessor Optimised Vehicle Actuation (MOVA) traffic signals at the Hermiston Gate roundabout and the A720/Calder Road junction.

**Gilmerton Crossroads** – identified as ‘junction improvement’ in the supplementary guidance. Cost given, and apportioned on a pro-rata basis (based on the expected number of units) to three allocated housing sites within the zone. Here and for some other zones, it would have aided clarity to have included the local development plan reference numbers for the allocated sites.

**Straiton Junction** – details of action and cost still to be established.

**Gilmerton Station Road/Drum Street** – identified as ‘junction improvement’ in the map on page 71 of the local development plan. Cost given in the supplementary guidance, and apportioned on a pro-rata basis (based on the expected number of units) to three allocated housing sites within the zone.

**Hermiston Park & Ride** – contribution of £1,000 per unit identified.

**Gillespie Crossroads** – action not specified but presumably a junction improvement. Cost given, and apportioned on a pro-rata basis (based on the expected number of units) to three allocated housing sites within the zone.

**Lasswade Road/Gilmerton Dykes Street/Captain’s Road** – identified as ‘junction improvement’ on page 69 of the local development plan. No cost provided in the supplementary guidance, with contributions to be secured through section 75 agreements for ‘relevant sites’.

**Lasswade Road/Lang Loan** – identified as ‘junction improvement’ on the map on page 67 of the local development plan. No costs provided in the supplementary guidance, which says it is ‘to be delivered as integral part of either adjacent development secured by S75’.

**Maybury/Barnton** – identified as ‘junction improvements’ in the map on page 58 of the local development plan. Cost given in the supplementary guidance, and apportioned on a pro-rata basis (based on the expected number of units) to two allocated housing sites within the zone.

**Queensferry** – costs provided for additional cycle parking at Dalmeny Station and apportioned on a pro-rata basis (based on the expected number of units) to three allocated housing sites within the zone. Costs for additional car parking at the station yet to be established.

**South East Edinburgh (North)** – action (presumably junction improvement) at Old Craighall junction. Cost per unit (housing) and per m<sup>2</sup> (other developments) provided.

**Sheriffhall** – junction upgrade, but no costs given.

**West Edinburgh** – as I note above, there is a separate page detailing total cumulative developer contributions amounting to £86m for a list of transport actions. There is also, it is said, a spreadsheet which would allow detailed calculation of the contributions required in each case, and the West Edinburgh Transport Assessment provides further background about the actions identified.

**Roseburn to Union Canal** – presumably relates to new or improved foot/cycle path. Total cost, and cost per residential unit, given. Cost per m<sup>2</sup> for non-residential development yet to be confirmed.

1.53 It can be seen that there are some gaps in the information provided, and some differences in approaches between the zones - for example some costs being per unit, some being assigned to sites on the basis of expected numbers of units; in some zones the allocated sites are listed, for others they are not. However, gaps and variations aside, when information is provided it does appear to provide certainty

1.54 Paragraph A on page 8 of the supplementary guidance says that contributions from allocated sites will be sought as specified in the action programme and Annex 2 of the guidance. The reference here to the action programme appears to me to introduce some uncertainty and to depart from the principle that the approach to contributions is to be established through the local development plan and the supplementary guidance, not through the action programme. It may be the case, however, that the intention is that the action programme will only provide further details (like timescales, and who is responsible for delivery) and would not change the actions and costs already set out in the supplementary guidance.

1.55 The point is raised that, where the transport contribution between sites is apportioned on the basis of their expected number of housing units, there is no provision made in the guidance should the actual number of houses built be different. The council advises that it used the mid-point of the site capacity range for each site as identified in the local development plan, and that this remains appropriate. Had the transport contributions been on the basis (like the education contributions) on a price per unit, then this might have provided both certainty of costs and the flexibility to deal with variations in site capacity. That might, however, provide less certainty that, overall for each zone, sufficient contributions would be secured to provide the necessary transport infrastructure intervention. It may be that the individual section 75 agreements made for each site would in fact take account of the actual number of units to be built, but that question is outwith the scope of my report.

1.56 For greenspace, as I note above, only one cumulative contribution zone is identified – South East Wedge/Little France. This provides a total project cost and the contribution required per dwelling. Costs for non-residential development are yet to be established.

1.57 In respect of healthcare infrastructure, the status of many of the interventions are 'exploring options'. Despite that, a cost per dwelling for each of the contribution zones is identified. In that respect, certainty is provided.

### **Amending the zones, actions and contributions in the guidance**

1.58 This is the third question I identified at paragraph 1.35. The council, in responding to consultations, notes the provision to modify the zones, infrastructure interventions and the charges which apply through the action programme. It is stated that the supplementary guidance (including annexes) would be updated following changes to the action programme. As I note above, in my view the appropriate place for setting out the zones, actions and contribution rates is the supplementary guidance itself. To do otherwise would create uncertainty and a lack of transparency. The council has consulted on the supplementary guidance, including the annexes, under the requirements of Section 22(3) of the Act and Regulation 2 of the Development Planning Regulations. It seems to me that, in order to make any substantive changes to the guidance, including to the annexes, the council would need to follow the same statutory procedures again, giving the opportunity for representations to be made on the revised guidance and having to notify Ministers before adopting it. I am not aware whether the council has considered the need to do this. It would be likely to add significantly to the time taken to review the guidance, a factor which ought to be borne in mind if the council intends regular reviews.

1.59 There is also the separate, but related, consideration about the extent to which one or more future reviews of the guidance would affect the level of certainty for developers and communities which it was intended to bring.

### **Section 75 agreements must restrict or regulate the development or use of land**

1.60 Respondents highlight this requirement from Section 75 of the Act, in particular in the light of the Supreme Court decision on the Elswick case. In response the council says that its model section 75 agreement requires contributions to be made prior to the commencement of development and therefore regulates the development of land. In any event, this question is beyond my scope in considering the supplementary guidance itself.

### **Format and clarity of the supplementary guidance**

1.61 One suggestion made is that the allocated sites should be shown within the zones. Provided this could be done without unduly cluttering the maps, I agree that this would have been helpful, in particular if it clarified which sites were to contribute. Likewise, I would tend to agree with the suggestion that it would have been clearer for the amounts of the secondary school contributions to have been set out in each education zone map rather than having to calculate these by subtracting the primary school contribution from the full contribution.

1.62 One respondent argued that the details of policy Del 1 (and also Tra 8) should be replicated in the supplementary guidance. But since the supplementary guidance and the local development plan need to be considered as a whole – both would be part of the development plan – I see no real need for this.

## **2 EDUCATION CONTRIBUTIONS**

### **The evidence for the need for contributions**

2.1 Several respondents make the claim that, for education but also for transport and healthcare, which I return to below, the supplementary guidance and associated appraisals do not sufficiently demonstrate that the cumulative contributions being sought comply with the 5 tests for Section 75 agreements set out in Circular 3/2012.

2.2 Respondents seek clearer evidence showing the extent and degree of current deficiencies in school capacities so that this can provide a baseline to consider any additional requirements as a result of new development. The guidance needs, it is said, to set out the direct impact allocated sites would have on education capacity of schools and set out the action required to mitigate this, including cumulative action. Respondents consider that there is a lack of evidence to separate out the impacts on school rolls from new development from that from existing development and rising rolls more generally. I have sympathy with these concerns - this is an important factor if the tests in the Circular are to be met.

2.3 There are comments made by some respondents about the particular approaches at specific sites or areas, including at Western Harbour, Leith, the International Business Gateway and West Craigs. However I do not have the kind of information before me to comment at this level of detail, and I therefore restrict myself to the more general matters raised by the approach in the supplementary guidance and the evidence from the education appraisal.

2.4 It is also argued that the guidance needs to demonstrate that the best use of existing infrastructure would be made before the need for new infrastructure is required – that it should identify existing spare capacity and say how this will be used. It is asked what other options were considered (such as catchment reviews), why has the proposed approach been taken, and how has it been demonstrated that this is the most cost-effective means of resolving capacity issues?

2.5 The supplementary guidance does not itself set out the evidential basis for its proposed approach to cumulative contributions. It is the education appraisal which the council puts forward as the detailed justification for its proposed approach, and that (or an earlier version of it – the August 2018 version is the one I refer to below) was available to respondents during the consultation process. However, in my view the appraisal does not provide the kind of comprehensive and detailed evidence for the approach to cumulative education contributions which interested developers and landowners would wish to examine. I do not doubt the council's intention only to require contributions on the basis of the additional impacts from the new housing development, indeed this is stated in the final paragraph on page 5 of the guidance. My concerns are instead about the evidence presented. Paragraphs 4.1-4.10 of the appraisal outline the methodology followed, but do not in my view provide the kind of detail which allows full scrutiny of that in the context of the tests in the circular, and nor do the subsequent sections in the appraisal covering each of the zones.

2.6 The education appraisal reports (section 3) rising primary school rolls in recent years. These rises are projected to continue, as are secondary school rolls (which have been falling in recent years).

2.7 In addition to the education appraisal I read the council's December 2016 report to the Education, Children and Families Committee providing school roll projections - [committee item 7.1](#) on the council's website. This document is referred to both in the education appraisal itself and in the council's response to the consultations on the draft supplementary guidance. It provides some further information about how the projected school rolls are calculated.

2.8 At paragraph 3.6 of that report, it is explained that the primary school projections are informed by data including catchment birth data, catchment population analysis, housing data (from the Housing Land Audit and known development information) and from National Records of Scotland 2014-based population projections. The school rolls are shown in the tables at Appendix 2 of the report.

2.9 I am not aware what particular housing sites are included in that housing data. Since the school roll projections are said by the council to be the basis for the need for contributions from new housing development in the local development plan, I assume that the housing allocations (or some of them at least) are included in that data.

2.10 One issue raised by respondents is the potential for double counting between general projections of population growth and the additional population from new housing development. I can at least see the potential for such double counting. The amount of land allocated for housing in the local development plan follows on from the requirements of SESplan (and its housing land supplementary guidance), which is informed by a Housing Need and Demands Assessment. So in one sense development plan housing allocations need to be seen as a response to expected (or desired) increases in population, not as a wholly separate influence on population change. However I do not have detailed evidence on these matters, so it would be fruitless to speculate further on this particular issue. And I would acknowledge the point that it is through the development plan allocations that the precise location of much of the population increase within the city is determined, and therefore which particular schools or zones would be affected by this.

2.11 In any event, what the council's committee report does not show (and nor does the education appraisal) is, for each school, what proportion of the projected future roll is expected to come from pupils from the housing allocations in the local development plan. Therefore it does not show whether, and if so to what degree, for each school, the new housing development is forecast to give rise or contribute to accommodation needs which cannot be met from within the existing school estate. It may be reasonable to assume that the majority of increases in the projected roll of a school, in particular one with significant new development expected to take place within its catchment, will be from pupils on newly built houses and flats. But without showing what this component is projected to be, the basis for the requested contributions is not completely transparent.

2.12 It may be that this kind of more detailed evidence is available to the council, indeed I expect that it would need to be, in order to have provided the basis for the proposed approach. If the component of the projected roll for each school which comes from new housing is based on the council's assumptions about the rate of new housing delivery and the pupil generation rates per house and flat, then it ought to be possible to show this kind of information. It may be that it would be the kind of information provided to justify section 75 agreements at the time they are to be agreed. But it is not evidence which I or the

respondents to the consultation process are party to, and therefore I cannot answer some of the questions they raise.

2.13 It could perhaps be argued that, since all the housing development supported in the local development plan and on other land with housing potential would, collectively, significantly exceed the existing capacity of the school estate, therefore there is no particular need to demonstrate, for each site and for each school, what the effects of development would be. But the council's approach is more subtle than that, seeking to deal with the issues on a zonal basis. Therefore I would have expected to see more evidence to demonstrate, at the least, the cumulative effects of development zone by zone.

### **The justification for the approach in each zone**

2.14 Paragraph 2.1 of the education appraisal says that it will be necessary to redraw school catchment boundaries to align new developments to existing schools with spare capacity or greater expansion potential. I think this clearly demonstrates the intention to make best use of existing school capacity. In my view it is for the council to decide how to make best use of the school estate. Although reducing the costs of interventions may be one driver in this, it would not necessarily be the only one. Therefore I am not persuaded that the council would need to show, for example, that the approach it proposes is the lowest cost one.

2.15 But I would have expected, since the extent, pattern and amounts of developer contributions are contingent upon it, a more detailed justification for the approach the council wishes to pursue. The supplementary guidance shows what zones (and sub-areas) the council has decided to employ, the suite of interventions for each, and the implications of this, in cost per dwelling, for each development site within the sub-areas. The education appraisal provides more detail, showing for each zone the capacity of the schools and the number of pupils estimated to come from the various development sites. But it does not detail how those new pupils will affect the rolls of the listed schools and what that means for their ability to cope. There is some narrative explanation of what effects are predicted and of the proposed solution for each zone but this falls short of the more quantitative analysis of the capacity issues caused by development and of how the solutions proposed will resolve them which developers and landowners could reasonably expect to see as justification for the very specific set of actions and contribution rates set out for each zone/sub-area.

2.16 Some respondents argue that the guidance should show the planned changes to the catchment areas (even if only broadly) and what this means for future pupil numbers at each school, from both existing pupils/housing areas and from new development. Whilst I acknowledge the council's point that catchment area reviews are subject to statutory consultation processes which cannot be pre-empted, information along these kinds of lines (properly caveated) would at least have helped to show more about the council's proposed approach in each zone and why this is considered by the council to be an appropriate response to the capacity issues raised.

2.17 I do not go as far as to agree with some respondents who stated that there should be more evidence on the alternative options which the council might have considered, or that the guidance should allow for alternative options to be put forward on a case by case basis. As I state above, I think the council is entitled to plan a way forward for the school estate which it considers will be best suited to its future needs, and not to encourage one-off,

bespoke solutions which could throw that plan into doubt. It would still be open to the council to consider alternative school capacity solutions put forward by developers on a case by case basis, but it would not be in the interests of certainty and a planned approach to encourage this through the supplementary guidance.

### **Should contributions be levied only for the catchment school(s) for a development?**

2.18 The principle of cumulative contribution zones is established in the local development plan under policy Del 1 and its supporting text. It is argued by some respondents, however, that housing development should only be required to contribute to education infrastructure actions within the school catchment area of the development concerned. I would acknowledge that a cumulative approach could be restricted to individual school catchment areas. However I am not convinced that it must be.

2.19 Respondents argue elsewhere that catchment reviews should be used to change catchment areas of schools to free up (and therefore make most efficient use of) existing capacity. This to me is an acknowledgement that catchment areas need not be fixed and can be used, as indeed the council intends, to best accommodate new development. I think it is difficult to argue that the council cannot then go further and set out how it would use the capacities and catchment areas of a number of schools together to make best use of these across a larger area. Separate legislation governs the process of changing school catchment areas. It has not been put to me that, specific development sites having been allocated in the local development plan, the council cannot now propose catchment changes to those schools where allocated housing sites fall within them. Aside from any approach to cumulative contributions, the council would want to continue to manage the school estate (including the approach to catchment areas) to ensure it meets future requirements, including but not limited to those arising from new housing development. Therefore it seems to me that the extent of a catchment area at any point in time cannot be considered to be a strictly limiting factor on the extent to which a development within it can be said to raise school capacity issues in a wider context.

### **Should school capacity be ‘first come first serve’?**

2.20 One respondent argues that school capacity should be apportioned to developments on a first come first served basis – any existing spare capacity would be allocated to the first developments to progress, with only the balance of new development after capacity has been taken up being required to contribute to the further school capacity then needed. Whilst this might be an approach the council could have pursued had it wished, it does not seem to me to fit so well with the principle of cumulative contribution zones, as established in the local development plan, when compared to the proposed approach of spreading a more even share of the costs across all developments.

### **Assumptions about travel to school thresholds**

2.21 In forecasting the extent to which Roman Catholic pupils will go to a Roman Catholic secondary school rather than a non-denominational school, the council takes account of distance to the school. So for some developments which are at greater distance to a Roman Catholic school, all secondary pupils are assumed to go to the nearer non-denominational school instead. One respondent asked for more information on what distance the council applies in making such an assessment, but I am not aware of any answer to this which the council may have provided.

## **Land and development costs for new schools**

2.22 The council advises that it commissioned an independent assessment of land costs for the sites for the new schools identified in table 5 of the local development plan. These estimated costs for each school site are set out on page 18 of the supplementary guidance, but with the caveat that they are indicative only. The cost of the land is to be shared by all the developments within the zone or sub-area where the new school site is located. The supplementary guidance adds these land costs (where they apply) to the per unit contributions identified.

2.23 One respondent expresses the view that contributions to these land costs from all developers in a zone/sub-area should be at residential value, whereas Homes for Scotland expressed the view that it should be at existing or final use value. It is not clear to me from the council's responses whether or not the valuation used is at residential value - the costs on page 18 vary from just under £500,000 per hectare at Granton Waterfront to about £2.4m per hectare at Maybury. On the basis of a cumulative approach to meeting education capacity constraints, and a consistent per-unit contribution for all the sites contributing towards the same education action, I can see that basing contributions for land costs for schools on residential value could be considered an equitable approach. In any event, it would have been helpful had the guidance provided more explanation of the basis for the assumed costs for land.

2.24 In addition to the cost of the land, the table on page 18 also provides estimated costs (again indicative) for remediation and other abnormal development costs for each school.

2.25 Respondents consider that the estimated remediation/abnormal costs are too high, and one suggests that it may be better for the developer to remediate the land rather than that cost be added to the contributions. On the latter point, the council's response indicates that this could be done, with the costs credited against that overall developer contribution.

2.26 In response to criticisms that the size requirements for new school buildings have been increased from the previous draft of the guidance, the council advises that these have, in the finalised version, reverted to the previous size for primary schools, and that the allowance of 11m<sup>2</sup> per secondary school pupils is based on Scottish Government guidance. I do not have the kind of detailed evidence before me which would allow me to reach a view on whether the sizes of school sought by the council are appropriate. However, as the statutory education authority, I would expect the council to be in the best position to reach an informed and reasonable view on this matter. Section 5 of the education appraisal provides further information about the assumed space requirements and costs of new schools.

2.27 The supplementary guidance says that these land and remediation costs, and the costs of the build works themselves, will vary from the estimates. This would mean that the amounts of the contributions levied would be different from those set out in the guidance.

## **Pupil Generation Rates**

2.28 The basis for the council's assumptions about the 'pupil generation rates' from new housing development has been questioned. The education appraisal explains (paragraph 4.3) that these are based on the average numbers of pupils generated by new development over a ten year period. Although I have not seen the raw data for this I see no reason to

suppose that the figures provided by the council, acting in its capacity as education authority, are not appropriate.

### **Retaining contributions for 30 years**

2.29 There is much criticism of the statement in the supplementary guidance that contributions towards education infrastructure may be held by the council for up to 30 years. It is argued that this is far too long, and any infrastructure for which contributions have been paid should be delivered in a much shorter timeframe. However it is stated in the supplementary guidance that this 30 year period is from the date of construction of the new infrastructure. It is explained that this is because of the need to accommodate revenue-based funding mechanisms where the project will be delivered but then the capital cost is repaid as part of a longer-term funding arrangement. I see no difficulty with this in principle. The contribution would be paid by the developer and go towards new school infrastructure which is then delivered. Whether that contribution is paid immediately to the school provider or whether it is held by the council for a longer period and used in stages as part of such a longer-term finance arrangement would not, it seems to me, materially affect the basis for seeking the contribution in the first place.

### **7.5% contingency costs**

2.30 The education appraisal applies a 7.5% contingency to the estimated costs of new education infrastructure. Homes for Scotland queries the basis for this, which the council says is to enable the risk of contributions not meeting construction costs due to inflation uplift. Since the costs in the guidance are index linked, I am not clear why a contingency would also be needed to account for inflation, although I can understand that it may be prudent to build in some contingency for unexpected site-specific costs. Clarification would have been helpful.

### **3 TRANSPORT CONTRIBUTIONS**

#### **The evidence base**

3.1 As with the education contributions, respondents assert that there has been a failure to provide sufficient evidence to properly demonstrate the impacts of new development on transport infrastructure or to justify the cumulative contributions sought. It has not been shown, it is stated, that there is a more than trivial link (again referencing the Elswick case) between the developments in the local development plan and the infrastructure actions to which they are to contribute. Nor are the expected costs justified in the supplementary guidance.

3.2 The basis for what are described as the 'large' cumulative contribution zones for transport infrastructure is also questioned. Some of the infrastructure actions are said to be remote from the developments which are to contribute towards them. It is stated that the relationship between each development, its transport impacts and the actions to which it is to contribute to have not been set out. In particular noting that there is to be a standard charge per (expected) housing unit in each zone, regardless of the location (and therefore impact) of any particular development site.

3.3 The council refutes this, pointing to the transport appraisals. In relation to the cumulative contribution zones used, it says that these are in fact relatively small, tightly drawn zones which ensure more than a trivial connection between the developments and the actions to which they must contribute.

3.4 One respondent considers that the supplementary guidance should confirm when the necessary actions require to be carried out, but it seems to me that this would normally be a matter addressed through planning conditions or obligations or in the action programme.

3.5 In providing my observations on these matters, I refer first to the transport appraisals which the council refers to, and which seek to provide (along with the development plan itself) the main justification for the approach taken in the supplementary guidance.

3.6 The original transport appraisal for the local development plan is dated March 2013. It was based on the first proposed plan. Subsequent to that, the SESplan housing land supplementary guidance was adopted, requiring greater amounts of housing land to be allocated, incorporated into a second proposed plan. The adopted local development plan included yet more sites, and the capacity of some of the earlier proposed sites had changed. Therefore an addendum to the transport assessment was published in November 2016, after the local development plan had been adopted, to reflect the changes since the first appraisal. I have had regard to both the addendum and the original appraisal. I have not considered in any detail the West Edinburgh Transport Appraisal nor the results of the Cumulative Impact Transport and Land Use Appraisal Working Group, as these would not significantly affect the main conclusions I reach.

3.7. It is explained first of all (in the original transport appraisal) that it was prepared to inform the local development plan and its action programme. The stated purpose of the appraisal was to assess the impact of the local development plan strategy on the transport network, and to identify the transport interventions required to ensure that the strategy does not have an unacceptable negative impact on the transport network.

3.8 The appraisal explains how trip generation rates for each development were derived, and that baseline modal split assumptions were based on census and household survey data. As well as the impacts from local development plan sites, the impacts of earlier, committed sites and of changes in traffic levels more generally were also included. A gravity model was used to identify the distribution of trips to/from homes and workplaces, and allowing for the effects of distance between these. Professional judgement was used to assign the proportion of trips to particular roads.

3.9. Three scenarios are modelled. The first of these can be given limited weight because it ignores the benefits of various transport interventions which are described as 'committed'. Scenario 2 assumes these committed schemes are implemented. The consultants undertaking the work held workshops with council officers and these then informed a list of further potential interventions. A number of criteria were used in selecting these interventions, including facilitating a shift to more sustainable forms of transport, reducing the impacts from travel, and deliverability. Account was taken of the five tests for planning conditions. Scenario 3 assumes that these other potential interventions are also implemented. The mode shares in scenarios 2 and 3 (and therefore the assumptions about vehicle trips on each route) are estimates based on professional judgement of the likely effectiveness of the interventions included, rather than detailed modelling.

3.10 The addendum appraisal updated this analysis in the light of the final suite of housing and other development allocations in the adopted local development plan. It is worth referring to some of these in considering the question (raised by several respondents) of to what extent the appraisals (and of course the local development plan itself) justify the proposed approach in the supplementary guidance.

3.11. The original appraisal says that, for the two strategic development areas where significant new development is proposed (West Edinburgh and South East Edinburgh) there are some common interventions that more than one site would benefit from.

3.12. In West Edinburgh, the five sites included in the original appraisal were Maybury 1 and 2 (now a single local development plan allocation), the International Business Gateway, Edinburgh Park and Cammo. The common interventions include improvement schemes at the Maybury, Barnton and Craigs Road junctions (T16-18 in the local development plan). In appendices B and C of the appraisal (where the interventions required for each site are identified), only the Maybury site is required to contribute to all of these three junction improvements. For Cammo it is just Maybury and Barnton, for the International Business Gateway it is Maybury, and Edinburgh Park need not contribute to any of them.

3.13. The capacity of the Maybury site had increased significantly by the time the addendum appraisal was prepared. The addendum says that the interventions identified previously would remain appropriate but that it is 'even more essential' that the Maybury and Barnton junction improvement schemes are provided. The **Maybury/Barnton contribution zone** (which covers the Maybury, Barnton and Craigs Road junctions) identifies only the Cammo and Maybury sites as contributors, and with both sites seemingly contributing to all 3 schemes. Given the relatively large number of interventions identified for **West Edinburgh** and the further transport appraisals for that area, I have not sought to look into the fine detail of the evidence for that zone.

3.14. Amongst the additional sites included in the addendum are those at South Queensferry (HSG32 and HSG33). For both of these, helping to provide enhanced car and cycle parking at Dalmeny Station are identified requirements. This is consistent with the **Queensferry** Transport Contribution Zone in the supplementary guidance, although I note that the Springfield site (HSG1 – identified in the local development plan as an existing housing proposal) is also included as a contributor in the guidance.

3.15. In South East Edinburgh the original appraisal included six sites and there are common interventions which are said to apply to 'various groups of sites'. The addendum considered capacity changes to some of these sites, but also some additional sites. There are multiple, overlapping transport contribution zones in the supplementary guidance in South East Edinburgh, so it is easiest to consider each of these in turn, in the order they appear in the map pages in the guidance:

**Burdiehouse Junction.** Broomhills (HSG21) and Burdiehouse (HSG22) are listed in the supplementary guidance as contributors. There are no other allocated sites within the zone, but the guidance also assumes a contribution from development of unallocated land identified as 'East of Burdiehouse'. This is all consistent with the details for these sites given in the transport appraisals.

**Gilmerton Crossroads.** Gilmerton Dykes Road (HSG23), Gilmerton Station Road (HSG24) and The Drum (HSG25) are listed in the supplementary guidance as contributors. No other sites are identified as contributors, albeit North of Lang Loan (HSG39) may slightly jut in at the southwest edge of the zone. This is all consistent with the details for these sites given in the transport appraisals.

**Straiton Junction.** Details of the action and cost are still to be established. There are no sites identified within the supplementary guidance as being contributors, although the sites at Broomhills (HSG21) and Burdiehouse (HSG22) would fall within it, as might the southwest tip of North of Lang Loan (HSG39)

**Gilmerton Station Road/Drum Street.** As with the Gilmerton Crossroads zone, Gilmerton Dykes Road (HSG23), Gilmerton Station Road (HSG24) and The Drum (HSG25) are listed in the supplementary guidance as contributors. There are no other allocated sites within the zone. The Gilmerton Dykes Road site is not identified in the appraisals as having to contribute towards this junction improvement, but the other two sites are.

**Lasswade Road/Gilmerton Dykes Road/Captain's Road.** No cost for this action is given in the supplementary guidance. It is stated that contributions are to be secured through section 75 agreements for 'relevant sites'. The supplementary guidance does not identify which sites that may be, although the transport appraisal addendum identifies the site at North of Lang Loan (HSG39) and the unallocated land at Lasswade Road as requiring to help towards this junction improvement. The sites at Gilmerton Dykes Road (HSG23), Gilmerton Station Road (HSG24) and Ellen's Glen Road (HSG28) are all within the zone.

**Lasswade Road/Lang Loan.** The supplementary guidance says this is to be delivered as an integral part of 'either adjacent development' and secured by a section 75 agreement. No cost is given. The transport appraisal update says that the site at North of Lang Loan (HSG39) is to replace this roundabout with a

signalised junction. It also identifies the need (should they be developed) for contributions towards this from the unallocated sites at East of Burdiehouse and Lasswade Road.

**South East Edinburgh (North).** The supplementary guidance identifies that this relates to contributions towards improvements to the Old Craighall Junction, with estimated costs of only £16.84 per unit, derived from draft guidance prepared by East Lothian Council. Although not identified in the guidance, the sites at Newcraighall North (HSG26), Newcraighall East (HSG27) and Brunstane (HSG29) are all within the zone. The original transport appraisal does not identify the need for the Newcraighall sites to contribute towards this action. The appraisal addendum, for the Brunstane site, identifies the need to 'review operation of A1/Newcraighall Road junction and help provide improvements, if deemed necessary.'

**Sheriffhall.** The supplementary guidance does not identify a cost for this junction upgrade, or the sites which would be expected to contribute. The sites at Edmonstone (HSG40), Edinburgh Bioquarter (Emp2), Moredunvale Road (HSG50) and (partially) the Drum (HSG25) are within the zone. Grade separation of this junction is noted in the original transport appraisal as a relevant committed intervention for the Moredunvale Road site, with 'minor impact', as it is in the addendum for Edmonstone, Brunstane (HSG29) and The Wisp (HSG41).

3.16 In respect of the other transport contribution zones, the transport appraisals assist as follows.

3.17 **Calder and Hermiston.** The supplementary guidance does not provide details of this action or its cost. A wide zone is identified to the west, but it is not stated which sites would be contributors.

3.18 **Hermiston Park & Ride.** The supplementary guidance specifies a contribution of £1000 per unit. A fairly wide zone is drawn to the west and south of Hermiston, but the sites which are to be contributors are not identified. The extension to the park and ride is identified as a relevant committed intervention with 'minor impact' for Riccarton Mains Road (HSG35), Curriemuirend (HSG31), Curriehill Road (HSG36), Newmills Road (HSG37) and Ravelrig Road (HSG38).

3.19 **Gillespie Crossroads.** This zone extends west along the A70 from the Gillespie Crossroads. The supplementary guidance identifies the need for contributions from Newmills Road (HSG37), Curriehill Road (HSG36) and Ravelrig Road (HSG38), all in accordance with the transport appraisal addendum. The sites at Riccarton Mains Road (HSG35), Curriemuirend (HSG31) are also within this zone but not identified as contributors in the supplementary guidance. The original transport appraisal identifies the need for the site at Curriemuirend to help towards the Gillespie Crossroads Scheme.

3.20 Table 10 of the appraisal addendum shows predicted road traffic levels assuming there are no transport infrastructure interventions beyond those considered as already 'committed' (scenario 2). Total increases in traffic by 2025 (assuming all the local development plan and other committed development sites are complete) range from 9.2% on the A71 Calder Road to 66.8% on Lasswade Road (although each road of course starts from a different baseline level of traffic, Lasswade Road for example being the quietest road included, the A720 city bypass being the busiest). The percentage of this increase from the

baseline arising from the local development plan sites on their own ranges from zero (on the A702 Biggar Road) to 58%, again on Lasswade Road. The largest absolute increases due to the local development plan sites, in vehicle numbers, are on the A8 Glasgow Road and A90 Queensferry Road. All of the key corridors identified in the appraisals are forecast to experience increase in vehicular traffic volumes of more than 5%. Of the 14 roads included, 12 are forecast to see increases exceeding 10.0%.

3.21 Table 13 of the appraisal addendum shows predicted traffic levels assuming all the additional interventions are implemented (scenario 3). Total increases in traffic by 2025 range from 8.9% on the A71 Calder Road to 61.8% on Lasswade Road. The percentage of this increase from the baseline arising from the local development plan sites on their own ranges up to 53.4%, again on Lasswade Road. The largest absolute increases due to the local development plan sites, in vehicle numbers, remain on the A8 Glasgow Road and A90 Queensferry Road. All of the key corridors are still forecast to experience traffic increase of more than 5%. Of the 14 roads, 10 are now forecast to see increases exceeding 10.0%.

3.22 I note above that the appraisals were prepared to inform the local development plan (although the addendum post-dated the plan's adoption) and its action programme. I take no issue with that purpose, but it is worth noting that the appraisals are now put forward as the background evidence for the supplementary guidance. As the supplementary guidance would, in effect, be the basis on which subsequent planning obligations for specific sites (based, in some zones, on precise costs set out in the guidance) would rest, this is a slightly different purpose. To serve that purpose, a more detailed, quantitative approach might be expected so as to demonstrate compliance with the tests for planning obligations set out in Circular 3/2012.

3.23 The original appraisal stated that the suite of interventions identified for scenario 3 (some of which are the basis for the interventions in the contribution zones in the supplementary guidance) were those required to ensure that the overall local development plan strategy did not have an 'unacceptable' negative impact on the transport network.

3.24 However the appraisal does not identify what is unacceptable. At the point of determining which interventions to apply for scenario 3, it is explained that various criteria were used in selecting these additional interventions. At that stage this was necessarily and understandably an exercise which required qualitative, professional judgement. For those interventions that facilitate a shift in favour of more sustainable transport modes, the resulting modal shifts set out in the appraisal in scenario 3 derive from an assessment of what the results of applying these interventions would be, not from target levels which the interventions were designed to achieve. I do not take issue with this pragmatic approach, but it is relevant to a consideration of how, when considering the case for section 75 agreements for contributions towards some of these interventions, the necessary tests set out in Circular 3/2012 can be shown to be met.

3.25 For the junction improvements which are identified in the appraisals, I can again understand why a qualitative and pragmatic approach was taken, but this does affect the ability, now, to understand more about the benefits (for example in lengths of queues, journey times and so on) that these interventions would deliver. Again that may be relevant in considering whether they are needed to make the cumulative transport effects of the local plan development strategy 'acceptable'.

3.26 The appraisals explain that, in selecting the interventions, regard was had to the necessary tests for a planning condition. Any planning obligations based on the cumulative contributions in the supplementary guidance will need to meet the tests set out in Circular 3/2012, including being necessary to make the development acceptable in planning terms and fairly and reasonably relating in scale and kind to the proposed development.

3.27 In relation to necessity, it is worth considering what guidance the local development plan has to offer. Policy Del 1 itself is couched in fairly general terms, requiring contributions where relevant and necessary to mitigate any negative impact, either individually or cumulatively, and where commensurate with the scale of the development. Paragraph 270 of the local development plan refers to mode share targets set out in the local transport strategy, but I am not aware how these relate to the improvements in mode share which some of the interventions in scenario 3 were judged likely to deliver. Policy Tra 8 is also worded in general terms, requiring that individual and cumulative transport impacts can be addressed so far as this is relevant and necessary. It also requires that the transport infrastructure in Table 9 of the plan and in the general and site specific development principles has been addressed, as relevant to the proposal. Paragraph 285 then states that these details take into account the impact of development proposals as far as is known at the time, but that further assessment is required to inform the detail of the necessary transport proposals and other interventions.

3.28 This context puts significant weight on delivery of the infrastructure items listed in the plan itself. Beyond that, it requires a planning judgement to be made in respect of when the impacts of development are considered to be at 'acceptable levels'. The appraisal addendum shows that, in terms of mode share, the interventions for scenario 3 show anticipated improvements. But there is no detailed explanation of why, site by site or as a whole, this renders the mode share of the proposed developments acceptable when it otherwise might not have been.

3.29 The effects of the interventions on the amount of traffic on each route are predicted in the appraisals. The appraisals assign trips to routes, but they do not show direction of travel or specify the increases in traffic at specific junctions. The effects on the safe and efficient operation of the road network as a result of the junction improvements amongst the scenario 3 interventions are not explained. I am not aware, excepting the additional analysis for West Edinburgh, of any further assessment beyond the transport appraisal and its addendum such as may be envisaged under the terms of paragraph 285 of the plan.

3.30 Turning now from the analysis in the transport appraisals to the supplementary guidance, and acknowledging that there is guidance provided in the local development plan itself, it would have been helpful to have had an explanation of the basis for how the content of the plan and the evidence in the appraisals was used to inform the approach in the supplementary guidance to the cumulative contribution zones. For example, showing how the appraisals translate into the zonal approach taken, and explaining why each particular set of developments are contributing to each particular intervention.

3.31 I am not aware of any detailed explanation for the basis, in defining the extent of most of the zones relating to junction improvements, for using a 1km radius. Nor why elongated zones were identified for the Gillespie Crossroads junction improvement (albeit I assume this is because traffic from development sites stretched out westwards along the A70 would pass through this junction) and for the Sheriffhall zone. Likewise why the South East Edinburgh (North) zone is an irregular shape rather than one based on distance to the

Old Craighall junction, and why the Calder and Hermiston Zone is fairly widely drawn. The zones relating to public transport interventions (Hermiston Park & Ride and South Queensferry) are also not based on simple distance to the intervention. I do not say that the shapes of these various zones are inappropriate, simply that I am unaware of the basis for the geographies identified. Since the extent of the zones affects which developments need to make a contribution, this is not, in my view, an insignificant matter.

3.32 The requirement that contributions in planning obligations must be related to the scale of the development proposed is also relevant to the question of how the zones are drawn. The logic behind linking the scale of the contribution to the number of units at each site is clear. But it is arguable that, to be fully justified, where several developments are making the same per-unit contribution to an intervention (or to a number of them) it should be demonstrated that their per-unit impacts would also be identical.

3.33 Some respondents question why, for a contribution zone based on a single intervention, each site would make the same per-unit contribution regardless of its distance from the junction. Again, some further explanation of this in the guidance or some other supporting evidence would have been helpful.

3.34 In respect of the costs of each intervention (and therefore the scale of the contributions required) I have no reason to doubt that, where costs are supplied for junction improvements in the supplementary guidance, that they are based on reasonable evidence. But it would have been helpful to have seen further evidence explaining the basis for them.

3.35 There are other matters of detail on which I would have found it helpful to have seen an explanation as to why the supplementary guidance seems to depart from what is foreshadowed in the local development plan and/or the transport appraisals. For example:

- There is no explanation as to why the contribution per unit for the Hermiston Park & Ride is £1,000.
- In the Maybury/Barnton zone, both the Cammo and Maybury sites would contribute to all three junction improvements identified. This is slightly different from the recommendations in the appraisals.
- In the South Queensferry zone, the site at Springfield (HSG1) is to make a contribution but this does not seem to be foreshadowed in either the appraisals or the local development plan itself.
- In the Gilmerton Station Road/Drum Street zone, the Gilmerton Dykes Road site (HSG23) is a contributor but this requirement is not (as it is for the other 2 sites in this zone) identified in the transport appraisals.
- It is not entirely clear to me how the contributions are to be handled in the Lasswade Road/Gilmerton Dykes Street/Captain's Road zone. Although several sites are within this zone, the appraisal and the local development plan identify only the allocated site at North of Lang Loan (HSG39) and the unallocated site at Lasswade Road as needing to make a contribution. Therefore it may be that, if both are developed, both would contribute.
- Likewise, I assume that, for the Lasswade Road/Lang Loan zone, North of Lang Loan would be the only contributor (although this does not appear to be identified as a requirement for this site in the local development plan) unless one or both of the unallocated site were also to gain planning permission.
- In the Gillespie Crossroads zone, I am not clear why the site at Curriemuirend (HSG31) (despite this requirement being included in the local development plan and

the appraisals) is not a contributor nor, for that matter, the site at Riccarton Mains Road (HSG35) which is also within this zone.

3.36 Since the Straiton, Sheriffhall and Calder & Hermiston junction zones say that the costs and actions are still to be established and do not identify which sites would be contributors, I make the assumption that it would be for a future iteration of the supplementary guidance to set out what, if any, cumulative contributions would be required from these zones.

### **Which categories of development are covered by the cumulative contribution zones?**

3.37 Respondents ask what categories/scales of development (other than housing) would be required to make a contribution towards the transport actions in the cumulative contribution zones. Table 1 of the supplementary guidance does not identify any particular category of development. At page 8 it is stated that other development proposals will be considered on a case-by case basis. Albeit it would have been open to the supplementary guidance to provide more details, I think the council is entitled to take this approach, including in considering whether the existing lawful use of the site needs to be taken into account in deciding the need for developer contributions.

### **Cumulative assessment in transport appraisals**

3.38 For development proposals which are not allocated sites or within the contribution zones identified, the supplementary guidance says that transport assessments must be prepared, with cumulative assessments which take account, amongst other things, of developments proposed in current planning applications and in Proposal of Application Notices. It is argued by some respondents that this is unreasonable, and assessments should only consider development which is committed or supported by the council through the local development plan allocations. In responding, the council points to the glossary definition of 'cumulative impact' in Scottish Planning Policy, which includes developments proposed in 'valid applications which have not been determined'. Although the council points out that Proposal of Application Notices can lead to valid applications thereafter, and that the need to identify cumulative impacts of development is identified in the local development plan itself, I do not find that the glossary item in Scottish Planning Policy lends support to requiring development proposed on Proposal of Application Notices to be included in cumulative assessments.

### **Exemptions from making contributions**

3.39 Network Rail and the Port of Leith Housing Association both argue that they should be excluded from the contributions on the basis that they are publicly owned or funded. The council in response says that the impacts of development require to be mitigated regardless of who the developer/landowner is. I see no imperative that the supplementary guidance make particular categories of developer or landowner exempt from the need to make contributions.

### **Trams**

3.40 Respondents raise several issues in relation to the provisions in the supplementary guidance for cumulative contributions towards the tram system.

3.41 It is argued that, since it is uncertain that the future extension of the tram network will proceed, it is premature and unnecessary to seek contributions towards this at the present time. It is also argued that there is no basis to seek contributions towards those parts of the tram network which have already been delivered, in particular as the costs of that over-ran. However, quite aside from what the supplementary guidance may say, Policy Del 1 in the local development plan already establishes that contributions may be required towards the existing and proposed tram network.

3.42 One respondent contends that the basis for the contributions should be distance from the tram stops alone, not from the line itself. I am not aware of any specific response from the council on this question. For my part, I would have thought that distance to specific stops, rather than to the line more generally, would be the more obvious indicator of a site's accessibility (and likely use of) the tram network, albeit I would acknowledge that the vicinity of the line itself (and of trams passing along it) would serve as an obvious reminder of this travel choice.

3.43 The Scottish Property Federation does not agree with the approach to tram contributions (set out in paragraph F of page 7 of the supplementary guidance) from major developments outwith the defined tram contribution zones. I find the wording of that paragraph to be a little opaque, but the general principle that every such proposal should be considered, in respect of its impacts on the tram system, on its merits would appear to be a reasonable one.

3.44 It is also argued that, for developments close to tram stops, requirements to support other transport infrastructure should be reduced accordingly, due to the higher proportion of trips generated by that development using (and due to the additional need to contribute towards the cost of) the tram network. However that seems to me to be a matter which could be considered through individual transport assessments.

3.45 On matters of detail, I note that the supplementary guidance identifies the need for contributions based on various distances to tram stops/line, the type of development and its scale. I have not seen detailed comments seeking to call into question the basis for this approach, but on the other hand I have not seen the evidence from the council in support of it – for example how the location, scale and type of development (and the cost of the tram line itself) has informed the assessment of the levels of contributions required. I do not assert that the approach taken cannot be justified, but simply that detailed evidence for this is not to be found in the transport appraisals.

## **4 HEALTHCARE CONTRIBUTIONS**

4.1 I record above that I do not see a strong basis in the local development plan for the inclusion of cumulative contribution zones for healthcare infrastructure in the supplementary guidance. Despite that conclusion, I consider below some of the other issues raised by respondents in relation to healthcare contributions.

### **The principle of developer contributions for healthcare infrastructure**

4.2 Homes for Scotland and other respondents argue, in principle, against the notion of developer contributions towards healthcare facilities. It is stated that the National Health Service is funded by central government and so it is not appropriate to seek developer contributions and that the council cannot control delivery of services provided by the National Health Service and/or private businesses.

4.3 I note, however, that the principle of healthcare contributions was, to some degree, considered through the local development plan examination process (Issues 21 and 23). Paragraph 145 of the plan concedes that 'whilst it may be appropriate to seek contributions for such provision any requirement would need to be considered on a case by case basis where a clear justification can be provided in the context of Circular 3/2012'. Policy Hou 10 provides that 'planning permission for housing development will only be granted where there are associated proposals to provide any necessary health and other community facilities relative to the impact and scale of development proposed', thereby providing a planning purpose for the provision of healthcare facilities.

4.4 Therefore it seems to me that the question is not whether, in principle, it can be appropriate for developer contributions to be made towards healthcare infrastructure (the local development plan would seem to establish that it could be) but whether the approach proposed by the council in the supplementary guidance is justified. Again, I do not seek to respond to site-specific matters given the lack of detailed evidence which I have about these.

### **The evidence base**

4.5 As with the other categories of infrastructure actions, respondents contend that there is insufficient justification for the new and extended facilities which are said to be required, with a lack of evidence to show why new capacity is required, to justify the costs for these set out in the guidance and to explain the basis for the proportion of these costs to come from developer contributions. There are also criticisms of the zonal approach taken, as general practices are said to have no fixed catchment area boundaries. Respondents also state that there should be no contribution of payments towards facilities run by what are essentially private businesses.

4.6 Although, again, there is not a detailed justification for the proposed approach in the supplementary guidance itself, I have had regard to the council's primary care appraisal.

4.7 The appraisal describes a situation where there is now a requirement in Edinburgh for new and expanded healthcare facilities since all the available capacity has been used up but the city continues to expand with new housing development. More and more practices have been closing their lists to new patients due to capacity issues. The appraisal also explains how, in recent years, short term measures have been put in place to make

incremental, generally small improvements to facilities to increase capacity, and with funding having been made available for this. However this is seen as a temporary measure and, whilst the appraisal shows the ongoing measures being taken to make the most out of the existing estate, more significant investment is needed to accommodate future housing development.

4.8 I have no reason to doubt the veracity of what is stated in the appraisal in setting out this context. It appears to me to demonstrate that a pragmatic approach has been taken to making the most out of existing infrastructure, but there is now a broad view amongst the healthcare agencies and providers involved that more significant investment is needed to accommodate the substantial amounts of development supported in the local development plan.

4.9 The supplementary guidance states clearly that any developer contributions would only be required to accommodate patients from new developments, not to resolve pre-existing capacity constraints. But it would have been better had the appraisal provided a more quantitative analysis to demonstrate why it is the case that the existing suite of healthcare facilities cannot accommodate the development proposed in the plan, and therefore why new capacity is required. It is asserted that this is the case, and the qualitative and narrative information in the appraisal would seem to bear this out, but I can understand why landowners and developers would want to see more a quantitative, geographically disaggregated analysis of the position to better demonstrate why, in each area, new development will require new infrastructure. The supplementary guidance says that existing local practice catchment areas and capacity were reviewed to assess what available capacity existed before identifying what new infrastructure is required for new development. But the appraisal does not provide the detail of that analysis, instead focussing more on what has been decided must be done as a result of it.

4.10 Setting that point aside, I discuss below the more detailed coverage of each of the four broad zones for healthcare provision identified in the appraisal and the guidance, and the justification for the approaches proposed there. For each, the number of new patients is calculated at 2.1 per dwelling, based on data on average household sizes. Albeit that, as Forth Ports points out, flats and studio apartments may have smaller numbers of residents, it does not appear to me unreasonable to proceed on the basis of an average household size. On the other hand it is stated in the appraisal that actual population increases would be higher if the new developments include (as would seem likely) family housing, but not what the response would be if this is the case.

4.11 For **North West Edinburgh**, based on the 2016 housing land audit, the table 'Housing Land Audit and Delivery Programme 2016 in the appraisal shows expected population (and therefore new patients) from new development of around 7,000 between 2016 and 2021 and a further 7,000 between 2021 to 2026.

4.12 The supplementary guidance identifies 5 infrastructure actions (11-15 in the table on page 56/57) for this zone – 3 new practices, one extension and one refurbishment. The total number of patients supported by these actions is 28,000, and the whole cost of these are to be from development. This is twice the number of new patients forecast by 2026 in the table in the appraisal. The costs per dwelling range from £105 per dwelling for Parkgrove to £1,050 in West Edinburgh, based on the anticipated costs of each of the actions identified.

4.13 The map on page 61 of the supplementary guidance shows the extent of the contribution zones, within which contributions would be required at the rates set out in the guidance.

4.14 For **North East Edinburgh**, the table in the appraisal shows expected population from new development of around 8,000 between 2016 and 2021 and a further 4,500 between 2021 to 2026.

4.15 The supplementary guidance identifies 5 infrastructure actions (1-5 in the table on page 56/57) for this zone – 4 new practices and one small scheme across 2 existing practices. The total number of patients supported by these actions is 43,500, of which 19,500 are from (and to be paid for by) new development. It is not clear to me why this is significantly larger than the number of new patients forecast by 2026 in the table in the appraisal. The costs per dwelling are £945 for the new practices, and only £60 per dwelling for the small scheme.

4.16 The map on page 58 of the supplementary guidance shows the extent of the 5 contribution zones.

4.17 For **South East Edinburgh** the table in the appraisal shows expected population from new development of around 4,200 between 2016 and 2021 and a further 3,100 between 2021 to 2026.

4.18 The supplementary guidance identifies 2 infrastructure actions (6 & 7 in the table on page 56/57) for this zone – 1 new practice and 1 'reprovision of existing premises'. The total number of patients supported by these actions is 12,000, of which 7,000 are from (and to be paid for by) new development. This is consistent with the number of new patients forecast by 2026 in the table in the appraisal. The costs per dwelling are £945 for the new practices, and only £60 per dwelling for the small scheme.

4.19 The map on page 59 of the supplementary guidance shows the extent of the 2 contribution zones.

4.20 For **South West Edinburgh** the table in the appraisal shows expected population from new development of around 4,500 between 2016 and 2021 and a further 1,700 between 2021 to 2026.

4.21 The supplementary guidance identifies 3 infrastructure actions (8-9 in the table on page 56/57) for this zone – 1 new practice and 2 extensions. The total number of patients supported by these actions is 21,000, of which 4,500 are from (and to be paid for by) new development. This is less than the number of new patients forecast by 2026 in the table in the appraisal. The costs per dwelling are £945 for the new practices, and only £60 per dwelling for the small scheme.

4.22 The map on page 50 of the supplementary guidance shows the extent of the 3 contribution zones.

4.23 It is not clear to me why the forecast numbers of new patients from development in each broad zone in the tables in the appraisal do not tally consistently with the stated total numbers of new patients from new developments by 2026 (and from which contributions would be required) in the table on pages 56/57 of the supplementary guidance. For the

broad North West and North East zones the latter number is higher, for the South West it is lower, for the South East the figures match fairly well.

4.24 It may have been in the interests of clarity (so that the basis of the contributions could be more readily understood) if the same tables in the appraisal (and/or the supplementary guidance itself) had listed which development sites would be required to make contributions towards each of the actions listed. Although 4 broad zones are set out, one for each sector of the city, in fact the contributions are levied towards (and therefore the sums for these are dependent on the costs of) each specific infrastructure intervention.

### **Catchment areas**

4.25 The supplementary guidance states that the healthcare contribution zones have not been defined on the basis of individual catchments since practice boundaries have no statutory status, and because they overlap. However by defining areas for each particular action and for contributions (see the maps on pages 58-61 of the guidance) the supplementary guidance links each development site to one infrastructure action only. So, in effect, this defines clear (not overlapping) boundaries for these, some of which are fairly close to each other - for example zones 1-3 in Leith/Granton, 4 & 5 at Craigmillar/Brunstane, 14 & 15 at Muirhouse/Crewe and 12 & 13 at Parkgrove/East Craigs/West Edinburgh.

4.26 Since it is acknowledged in the supplementary guidance that, in reality, catchments are not discrete and do overlap, it would have been helpful for more information to have been provided to justify this approach to the catchment areas. This is the case because, for example, the per unit contribution required for the West Edinburgh zone is 10 times the amount required at the nearby Parkgrove zone, and the contribution for the Niddrie action is more than 15 times that required for the nearby Brunstane action. Related to this, I also note that the appraisal raised the prospect (paragraphs 4.6 and 4.7) of rationalisation of current catchments with the potential for overlapping boundaries.

### **Costs**

4.27 In respect of the actual costs per action identified in the supplementary guidance, the appraisal says that, as a guide, each 1,000 patients would require approximately 90m<sup>2</sup> of floorspace. Section 5 of the appraisal outlines estimated costs:

- Costs for small and intermediate schemes (£0.01m to £0.1m) based on recent developments of this scale.
- Intermediate schemes (£0.1m to £0.5m) based on recent developments of this scale.
- Refurbishment/re-design (£0.5m to £1.2m).
- New build – indicative costs based on Scottish Futures Trust metrics.

4.28 As a crude rule of thumb, it is stated that the cost of provision could be estimated at £500k per 1000 patients. Although it is acknowledged that actual costs will vary from action to action (which presumably could be reflected in any Section 75 agreements ultimately signed) the guidance does therefore seem to provide costs and contributions which are based on reasonable assumptions for each type of action.

## **Developer contributions for private businesses/practices**

4.29 On page 11 of the supplementary guidance it is explained that:

'The Public Bodies (Joint Working) Scotland Act 2014 requires health boards and local authorities to integrate health and social care services. In Edinburgh, the integration of the services from City of Edinburgh Council and NHS Lothian is now under the authority of the Edinburgh Integration Joint Board (IJB). The planning, resources and operational oversight for the range of NHS and local authority care services, including primary care, is the responsibility of the Edinburgh Health and Social Care Partnership (EHSCP), which is governed by the Edinburgh IJB.

The majority of the current 72 practices in Edinburgh are independent contractors, with eight directly managed by EHSCP/NHS Lothian. Irrespective of whether they are independent contractors or directly managed, EHSCP work with all GPs to plan future primary care provision and develop healthcare actions in response to the implications of the LDP.'

4.30 To the patient, it would seem to matter little whether their primary healthcare provider is a private practice or not, since all the practices are delivering NHS services. The appraisal explains that some practices have closed lists in recent years, and narrates a process whereby incremental improvements and extensions have been made to practice facilities over the years in order to boost capacity and accommodate new patients. I get no sense that this is an environment where a practice is likely to be able or to want, in response to new development, to raise capital so as to extend a facility in order to take on the resultant new patients. I am not convinced these differences across the city in the status of practices should affect the ability to seek developer contributions.

## **5. CONCLUSIONS**

5.1 I return at this point to the three matters I was asked to report on

### **The consultation undertaken to date, and the way that views have been taken into account by the City of Edinburgh Council.**

5.2 I have set out in the sections above the main issues raised in the consultation responses to the draft supplementary guidance, and my own views on these. The list of proposed changes to the draft version shows that the council made various amendments in response to the consultations received. Changes relate, amongst other things, to the information on the costs of some of the interventions, a further explanation for the basis of the approach to healthcare contributions and the removal of the transport contribution zones in north Edinburgh.

5.3 But the main observation I would make is that, as can be seen from my comments above, there are many questions raised about the evidence and justification for the approach in the supplementary guidance which, to my mind and on the basis of the evidence I have examined, remain unanswered. If there is further evidence for the approach taken, beyond the appraisals and the local development plan itself, then I have not seen it. It may be the case that this fuller evidence in support of the contributions being sought would be provided at the planning application stage, before section 75 agreements are made. But I would have expected to see more of the evidence in support of the supplementary guidance itself, since this will be the basis for any cumulative contributions which are required.

### **The methodology used to calculate contributions for education infrastructure.**

5.4 I cover this matter in chapter 2 above. In summary, in my view neither the supplementary guidance or the appraisal provide the kind of detailed evidence for the approach to cumulative education contributions which I would expect interested developers and landowners would wish to examine, or to allow full scrutiny of the approach to the calculations. This applies in relation to identifying the contribution to school capacity issues from new development and then justifying the approach to be taken in each contribution zone.

### **Compliance of the supplementary guidance with Circular 3/2012.**

5.5 I note below what seem to me to be the key elements of the circular, which sets out the circumstances in which planning obligations can be used, in relation to the supplementary guidance. Paragraphs 30 to 35 of the circular explain the role of plan-led approach in relation to planning obligations.

5.6 The circular requires that broad principles for planning obligations, including the items for which contributions will be sought and the occasions when they will be sought, are set out in the development plan.

5.7 The local development plan envisages that there may be a need for contributions towards all of the types of infrastructure which are covered in the supplementary guidance. However, and as I note above, I do not think that the plan provides a strong basis for the

inclusion of cumulative contribution zones for healthcare infrastructure in the supplementary guidance.

5.8 The circular states that methods and exact levels of contributions should be included in statutory supplementary guidance. Where planning authorities propose to rely on standard charges and formulae, they should include these in supplementary guidance along with information on how standard charges have been calculated, how monies will be held, how they will be used and, if applicable, how they will be returned to the developer.

5.9 Although there are gaps for some contribution zones (which I presume would need a further iteration of the supplementary guidance to resolve), on the face of it the supplementary guidance does, where contribution rates are given, provide exact levels of contributions. I do note however that the costs of some of the various infrastructure interventions are subject to further confirmation, and this could affect the level of the contributions which are ultimately required from a development.

5.10 In respect of 'methods' for the cumulative contributions, notwithstanding my comments above about the evidence and justification for some of these and about the approach taken in each case, the supplementary guidance sets out an approach for each of the different types of infrastructure (the approach to any contributions towards public realm infrastructure would need a further iteration of the guidance). Standard charges to be applied are set out in the supplementary guidance, although not for all zones where, again, a further iteration of the guidance would be required rather than seeking to amend/provide these through the action programme. The supplementary guidance provides information about how monies will be held and how they may be used, and it says that planning obligations can make provision for the repayment of unused contributions if the actual costs of delivering infrastructure are lower than anticipated.

5.11 I am doubtful though, about the extent to which the supplementary guidance can be said to fulfil an expectation that it include sufficient information about how these standard charges have been calculated. As I note in the chapters above, I do not think that even the appraisals provide this. Likewise, I have not seen sufficient evidence that I can say with confidence that the approaches applied in the guidance will reflect the actual impacts of, and be proportionate to, the developments in question, as required by paragraph 33 of the circular.

5.12 In relation to the 5 tests for planning obligations set out in the circular, I have set out above my significant concerns about whether the supplementary guidance fully demonstrates that any contributions in planning obligations based upon it would be necessary to make proposed developments acceptable in planning terms and whether the scale of the contribution would fairly and reasonably relate to the development in question. I do not think that it does.

T: 0131-244 7547  
E: [chief.planner@gov.scot](mailto:chief.planner@gov.scot)

Karen Heywood  
Acting Chief Reporter  
DPEA  
By email: [Karen.Heywood@gov.scot](mailto:Karen.Heywood@gov.scot)

Our ref: A22831020

29 November 2018

Dear Karen

**The City of Edinburgh Council  
Supplementary Guidance on Developer Contributions and Infrastructure Delivery**

On 7 September 2018 the City of Edinburgh Council certified notice of their intention to adopt the Supplementary Guidance on Developer Contributions and Infrastructure Delivery. This document relates to infrastructure provision in our capital city and contributions towards its costs. As such, this is a significant matter, requiring comprehensive consideration before a decision can be made on whether or not the Scottish Ministers wish to intervene.

To inform this decision, the Minister for Local Government, Housing and Planning has asked me to instruct DPEA to prepare and submit a report, if possible before 8 February 2019, setting out:

- The consultation undertaken to date, and the way that views have been taken into account by the City of Edinburgh Council;
- The methodology used to calculate contributions for education infrastructure; and
- Compliance of the supplementary guidance with Circular 3/2012.

Officials in my team will provide you with the relevant background information they hold on the supplementary guidance. I would be grateful if you could keep them informed if there are any issues arising from the timescale set out above.

Many thanks for your assistance.

**John McNairney**  
Chief Planner

Victoria Quay, Edinburgh EH6 6QQ  
[www.gov.scot](http://www.gov.scot)



---

**APPENDIX 5 – HERIOT-WATT EMPLOYEE INFORMATION**



# **Heriot-Watt University Employee Information**

**April 2019**

## Contents

List of Tables .....	3
1. Introduction and context.....	5
2. Additional Notes .....	6
3. Employee Profile by Protected Characteristic Groups .....	7
4. Employee Profile – Academic, Professional Services, Full/Part Time Staff, Absence Returners.....	10
5. Heriot-Watt University Employee Profile – Training, Development, Progression and Promotion ....	13
6. Heriot-Watt University Employee Profile – Grievance, Disciplinary, Dismissals.....	17
7. Heriot-Watt University – Recruitment: Applicants and Accepted roles by Grade, Academic, Professional Services and Protected Characteristic 1st August 2017 to 31st July 2018. * <i>Scottish Campuses only</i> .....	18
i. Applicants .....	18
ii. Accepted .....	19
8. Heriot-Watt University – Composition of influential committees 2017-2019 .....	20

## List of Tables

Table 1: Overall Staff Profile by Protected Characteristic: Campus location and age .....	7
Table 2: Overall Staff Profile by Protected Characteristic: Campus location and disability.....	7
Table 3: Overall Staff Profile by Protected Characteristic: Campus location and ethnicity .....	8
Table 4: Overall Staff Profile by Protected Characteristic: Campus location and gender.....	8
Table 5: Overall Staff Profile by Protected Characteristic: Campus Location and religion & belief.....	8
Table 6: Overall Staff Profile by Protected Characteristic: Campus location and gender identity* Scottish Campuses only.....	9
Table 7: Overall Staff Profile by Protected Characteristic: Campus location and sexual orientation* Scottish Campuses only .....	9
Table 8: Overall Staff Profile by Protected Characteristic: Campus location and marital status .....	9
Table 9: Overall Staff Profile by campus locations and job family (academic and professional services employees) .....	10
Table 10: Overall Staff Profile by campus location, disability and full time/part time status*Scottish campuses only .....	10
Table 11: Overall Staff Profile by campus location, ethnicity and full time/part time status*Scottish campuses only .....	11
Table 12: Overall Staff Profile by campus location, gender and full time/part time status* Scottish campuses only .....	11
Table 13: Women returning to work after maternity leave.....	12
Table 14: disabled employees returning to work after disability related absence.....	12
Table 15: Employees undertaking PDR 2016-17 by campus location .....	13
Table 16: Employees undertaking PDR 2016-17 by gender .....	13
Table 17: Employees undertaking PDR 2016-17 by ethnicity.....	13
Table 18: Employees undertaking PDR 2016-17 by academic and professional service roles.....	13
Table 19: Participation in academic learning and development by gender 2016-17 .....	14
Table 20: Participation in academic learning and development by gender 2017-18 .....	14
Table 21: Participation in Aurora (headcount), 2013-15 – 2016-19.....	14
Table 22: Contribution Board cases received 2017-18 , by gender, full/part time academic and professional services staff covering all grades* Scottish campuses .....	15
Table 23: Professional Services Regradings by Gender 2017-18* Scottish campuses.....	15
Table 24: Academic Advancement Board by gender 2017-18* Scottish campuses .....	15
Table 25: Academic promotion success rates by gender and grade 2013-18* Scottish campuses.....	16
Table 26: Grievance (including harassment) information by school (by PC – gender, ethnicity and disability) 1 January 2018 - 31 December 2018 * Scottish Campuses only .....	17
Table 27: Disciplinary action (including harassment) (by PC – gender, ethnicity and disability) 1 January 2018 - 31 December 2018 * Scottish Campuses only .....	17
Table 28: Dismissals (by PC – gender, ethnicity and disability) 1 January 2018 - 31 December 2018* Scottish Campuses only .....	17
Table 29: Other reasons for leaving (by PC – gender, ethnicity and disability) 1 January 2018 - 31 December 2018 *Scottish Campuses only .....	17
Table 30: Applicants: Academic and Professional Service Roles by gender.....	18
Table 31: Applicants - Academic and Professional Service roles by ethnicity.....	18

Table 32: Applicants- Academic and Professional Service roles by disability .....	18
Table 33: Recruitment: Academic and Professional Service Roles by gender .....	19
Table 34: Recruitment - Academic and Professional Service roles by ethnicity .....	19
Table 35: Recruitment- Academic and Professional Service roles by disability .....	19
<i>Table 36: University Court Gender Profile .....</i>	<i>20</i>
<i>Table 37: University Court Ethnicity Profile .....</i>	<i>20</i>
Table 38: University Senate .....	20
Table 39: University Executive – BAME composition .....	20
Table 40: University Executive - gender composition .....	20
Table 41: University Committee of Learning and Teaching: gender composition .....	21
Table 42: University Committee of Research and Innovation – BAME composition .....	21
Table 43: University Committee of Research and Innovation – gender composition .....	21
<i>Table 44: Professional Services Leadership Board – BAME composition.....</i>	<i>21</i>
Table 45: Professional Services Leadership Board - gender composition .....	21

# Employee Information 2019

## 1. Introduction and context

Heriot-Watt University is publishing data in line with our employee information data requirements under the Equality Act 2010. Following guidance published by the Equality and Human Rights Commission, '*Employee Information and the Public Sector Equality Duty: A guide for public authorities in Scotland*'<sup>1</sup> our publishing is aligned with the recommendation (p14) to cover the following areas:

- Recruitment
- Promotion
- Pay and Remuneration
- Training and Development
- Return after maternity leave
- Return to work of disabled employees following sick leave relating to their disability
- Appraisal
- Grievances (including about harassment)
- Disciplinary action (including for harassment)
- Dismissals and other reasons for leaving

We are presenting high level data on the protected characteristics of our staff groups. At this stage our protected characteristic reporting focuses on gender, ethnicity and disability.

Our aim is to create data sets that enable all our requirements to be met through one process. The data produced sets the ground work for future activities that will analyse the intersectionality of protected characteristics and tell us more about who makes up our staff community.

---

<sup>1</sup> [www.equalityhumanrights.com/en/publication-download/employee-information-and-public-sector-equality-duty-guide-public-authorities](http://www.equalityhumanrights.com/en/publication-download/employee-information-and-public-sector-equality-duty-guide-public-authorities)

## 2. Additional Notes

- All staff refers to staff across the University including Edinburgh Business School and our Dubai and Malaysia Campuses. The data does not include casual staff. %s are subject to rounding.
- Each table clearly states the time frame for the data presented.
- *\*indicates where data is unavailable at time of publication.*
- Data presented based on all staff to preserve anonymity.
- Pay and remuneration (by gender, ethnicity and disability) is contained under separate cover within the Heriot-Watt University Equal Pay Statement 2017-21 and the April 2019 Equality Pay Information publication found at [www.hw.ac.uk/services/equality-diversity/legal-requirements.htm](http://www.hw.ac.uk/services/equality-diversity/legal-requirements.htm)
- **Where the tables refer to a very small number of individuals, totals have been omitted or aggregated to avoid the risk of identification, in line with the Information Commissioner's Office Anonymisation Code of Practice <https://ico.org.uk/media/1061/anonymisation-code.pdf>**
- **Where data refers to a unit of 5 or less we have replaced the figure with <5 in the number column/row and N/A in the percentage column/row to ensure anonymity.**
- **Due small numbers we have been unable to produce for publication data referring to grievance (including harassment), disciplinary action (including harassment, dismissals or other reasons for leaving). The information is held internally and requests to use the data will be responded to on a case by case basis.**

### 3. Employee Profile by Protected Characteristic Groups

- Total Staff after removing duplicates across all campuses: 2258
- Total UK based staff: 1916
- 31 December 2018 census date unless stated

Table 1: Overall Staff Profile by Protected Characteristic: Campus location and age

	Scottish campuses		Dubai		Malaysia	
	No.	%	No.	%	No.	%
<b>25 years and under</b>	86	4%	<5	N/A	10	4%
<b>26-30</b>	149	8%	11	10%	36	16%
<b>31-35</b>	270	14%	16	14%	57	25%
<b>36-40</b>	294	15%	21	18%	54	24%
<b>41-45</b>	210	11%	24	21%	32	14%
<b>46-50</b>	246	13%	15	13%	24	11%
<b>51-55</b>	260	14%	12	11%	9	4%
<b>56-60</b>	245	13%	<5	N/A	<5	N/A
<b>61-65</b>	101	5%	7	6%	<5	N/A
<b>66 years &amp; older</b>	55	3%		0%		0%
<b>Grand Total</b>	1916	100	114	100	228	100

Table 2: Overall Staff Profile by Protected Characteristic: Campus location and disability

	Scottish campuses		Dubai		Malaysia	
	No.	%	No.	%	No.	%
<b>Information refused</b>	<5	N/A		0%	<5	N/A
<b>Known disability</b>	49	3%	<5	N/A	<5	N/A
<b>No known disability</b>	29	2%	6	5%	<5	N/A
<b>Not known</b>	1837	96%	107	94%	228	100%
<b>Grand Total</b>	1916	100%	114	100%	228	100%

Table 3: Overall Staff Profile by Protected Characteristic: Campus location and ethnicity

	Scottish campuses		Dubai		Malaysia	
	No.	%	No.	%	No.	%
<b>BME</b>	185	10%	53	46%	211	93%
<b>Information refused</b>	117	6%		0%		0%
<b>Not known</b>	128	7%	31	27%	10	4%
<b>White</b>	1486	78%	30	26%	7	3%
<b>Grand Total</b>	1916	100%	114	100%	228	100%

Table 4: Overall Staff Profile by Protected Characteristic: Campus location and gender

	Scottish campuses		Dubai		Malaysia	
	No.	%	No.	%	No.	%
<b>Female</b>	901	47%	51	45%	133	58%
<b>Male</b>	1015	53%	63	55%	95	42%
<b>Grand Total</b>	1916	100%	114	100%	228	100%

Table 5: Overall Staff Profile by Protected Characteristic: Campus Location and religion & belief

	Scottish campuses		Dubai		Malaysia	
	No.	%	No.	%	No.	%
<b>No religion</b>	339	18%	<5	N/A	<5	N/A
<b>Buddhist</b>	6	0%	<5	N/A	<5	N/A
<b>Christian - Church of Scotland</b>	185	10%	<5	N/A	<5	N/A
<b>Christian - Roman Catholic</b>	85	4%	<5	N/A	<5	N/A
<b>Christian - other denomination</b>	73	4%	<5	N/A	<5	N/A
<b>Hindu</b>	<5	N/A	<5	N/A	<5	N/A
<b>Muslim</b>	6	0%	10	9%	<5	N/A
<b>Sikh</b>	<5	N/A	<5	N/A	<5	N/A
<b>Spiritual</b>	6	0%	<5	N/A	<5	N/A
<b>Any other religion - or belief</b>	16	1%	<5	N/A	<5	N/A
<b>Information refused</b>	1046	55%	80	70%	196	86%
<b>Unknown</b>	149	8%	10	9%	32	14%
<b>Grand Total</b>	1916	100%	114	100%	228	100%

Table 6: Overall Staff Profile by Protected Characteristic: Campus location and gender identity\* Scottish Campuses only

Question: Is your gender identity the same as the gender you were originally assigned at birth?

	Scottish Campuses	
	No.	%
<b>Yes</b>	1747	91%
<b>No</b>	<5	N/A
<b>Information refused</b>	17	1%
<b>Unknown</b>	149	8%
<b>Grand Total</b>	1916	100%

Table 7: Overall Staff Profile by Protected Characteristic: Campus location and sexual orientation\* Scottish Campuses only

	Scottish Campuses	
	No.	%
<b>Bisexual</b>	13	1%
<b>Gay man</b>	13	1%
<b>Gay woman/lesbian</b>	<5	N/A
<b>Heterosexual</b>	702	37%
<b>Other</b>	<5	N/A
<b>Information refused</b>	1035	54%
<b>Unknown</b>	149	8%
<b>Grand Total</b>	1916	100%

Table 8: Overall Staff Profile by Protected Characteristic: Campus location and marital status

	Scottish campuses		Dubai		Malaysia	
	No.	%	No.	%	No.	%
<b>Civil Partnered</b>	<5	N/A	<5	N/A	<5	N/A
<b>Co-habiting</b>	93	5%	<5	N/A	<5	N/A
<b>Divorced</b>	42	2%	<5	N/A	<5	N/A
<b>Married</b>	850	44%	72	63%	109	48%
<b>Unknown</b>	454	24%	19	17%	40	18%
<b>Other</b>	35	2%	2	2%		0%
<b>Prefer not to answer</b>	53	3%	<5	N/A	<5	N/A
<b>Separated</b>	19	1%	<5	N/A	<5	N/A
<b>Single</b>	263	14%	9	8%	79	35%
<b>Undisclosed</b>	85	4%	11	10%	<5	N/A
<b>Widow/Widower</b>	17	1%	<5	N/A	<5	N/A
<b>Grand Total</b>	1916	100%	114	100%	228	100%

#### 4. Employee Profile – Academic, Professional Services, Full/Part Time Staff, Absence Returners

Table 9: Overall Staff Profile by campus locations and job family (academic and professional services employees)

		Scotland	Dubai	Malaysia
<b>TOTAL NUMBER OF STAFF</b> (Total: 2258)	Number	1916	114	228
	% of total staff	85	<5	N/A
<b>Academic</b> (t.1001)	Number	796	82	123
	%	80	8	12
<b>Professional Services</b> (t. 1257)	Number	1120	32	105
	%	89	<5	N/A

Table 10: Overall Staff Profile by campus location, disability and full time/part time status\*Scottish campuses only

	Scottish campuses	
	No.	%
<b>Full time Information refused</b>	<5	N/A
<b>Full time Known disability</b>	40	2%
<b>Full time No known disability</b>	18	1%
<b>Full time Not known</b>	1412	74%
<b>Part Year Worker Known disability</b>	<5	N/A
<b>Part Year Worker No known disability</b>	<5	N/A
<b>Part Year Worker Not known</b>	27	1%
<b>Part time Known disability</b>	8	0%
<b>Part time No known disability</b>	10	1%
<b>Part time Not known</b>	398	21%
<b>Grand Total</b>	1916	100%

Table 11: Overall Staff Profile by campus location, ethnicity and full time/part time status\*Scottish campuses only

	Scottish campuses	
	No.	%
<b>Full time BME</b>	156	8%
<b>Full time Information refused</b>	99	5%
<b>Full time Not known</b>	92	5%
<b>Full time White</b>	1124	59%
<b>Part Year Worker Information refused</b>	<5	N/A
<b>Part Year Worker Not known</b>	<5	N/A
<b>Part Year Worker White</b>	26	1%
<b>Part time BME</b>	29	2%
<b>Part time Information refused</b>	17	1%
<b>Part time Not known</b>	34	2%
<b>Part time White</b>	336	18%
<b>Grand Total</b>	1916	100%

Table 12: Overall Staff Profile by campus location, gender and full time/part time status\* Scottish campuses only

	Scottish campuses	
	No.	%
<b>Full time</b>	1471	77%
<b>Part Year Worker Male</b>	22	1%
<b>Part Year Worker Female</b>	7	0%
<b>Part time Male</b>	110	6%
<b>Part time Female</b>	306	16%
<b>Grand Total</b>	1916	100%

*Table 13: Women returning to work after maternity leave*

*Not available at publication - will be included in due course*

*Table 14: disabled employees returning to work after disability related absence*

*Not available at publication - will be included in due course*

## 5. Heriot-Watt University Employee Profile – Training, Development, Progression and Promotion

PDR uptake percentages based on numbers completing rather than total employees. Latest figures cover 2017.

Table 15: Employees undertaking PDR<sup>2</sup> 2016-17 by campus location

Completion by campus location	2016	2017
Scottish Campuses	70%	63%
Dubai Campus	64%	50%
Malaysia Campus	65%	74%

Table 16: Employees undertaking PDR 2016-17 by gender

Completion by gender	2016	2017
Men completing	52%	52%
Women completing	48%	48%

Table 17: Employees undertaking PDR 2016-17 by ethnicity

Completion by Ethnicity	2016	2017
White	71%	*
BAME	18%	*
Unknown	7%	*
Refuse to answer	5%	*

\* Difficulties with data for 2017 relating to ethnicity at time of publication.

Table 18: Employees undertaking PDR 2016-17 by academic and professional service roles

Completion by academic/professional services	2016	2017
Academic staff completing	48%	47%
Professional services completing	52%	53%

Table 19: Participation in academic learning and development by gender 2016-17

Course	Male (individuals)	Male (attendances)	Female (individuals)	Female (attendances)	Total (individuals)	Total (attendances)
Research Futures	50	111	22	69	72	180
Scottish Crucible	12	Not available	17	Not available	29	Not available
Public Engagement	40	48	45	74	86	123
PG CAP	30	302	22	225	52	527
L&T Enhancements	38	53	28	37	67	91
Academic CPD	17	50	32	67	50	118

Table 20: Participation in academic learning and development by gender 2017-18

Course	Male (individuals)	Male (attendances)	Female (individuals)	Female (attendances)	Total (individuals)	Total (attendances)
Research Futures	161	230	82	127	243	357
Scottish Crucible	18	N/A	15	N/A	33	N/A
Public Engagement	N/A	N/A	N/A	N/A	N/A	269
PCGAP	23	N/A	29	N/A	52	N/A

Table 21: Participation in Aurora (headcount), 2013-15 – 2016-19

	2013-15		2016-19	
	Number	%	Number	%
Academic	24	43%	22	43%
Professional Services	32	57%	29	57%
<b>Total</b>	56	100%	51	100%

Table 22: Contribution Board cases received 2017-18 , by gender, full/part time academic and professional services staff covering all grades\* Scottish campuses

	2017				2018			
	Female		Male		Female		Male	
	Full time	Part time						
<b>Academic</b>	8	<5	13	<5	7	<5	26	<5
<b>Professional Services</b>	15	6	12	<5	24	<5	14	<5
<b>Total</b>	23	6	25	<5	31	6	40	<5

Table 23: Professional Services Regradings by Gender 2017-18\* Scottish campuses

	2017		2018	
	Female	Male	Female	Male
<b>Number of cases</b>	14	<5	16	<5
<b>Number promoted</b>	10	<5	12	<5
<b>Success rate</b>	71%	80%	75%	80%

Table 24: Academic Advancement Board by gender 2017-18\* Scottish campuses

	2017					2018				
	Grade 6		Grade 7		Total	Grade 6		Grade 7		Total
	Female	Male	Female	Male		Female	Male	Female	Male	
<b>Number of cases</b>	<5	<5	13	11	27	<5	<5	9	13	25
<b>Number promoted</b>	<5	<5	9	8	20	<5	<5	9	10	22
<b>% Success</b>		100%	69%	73%	74%	100%	100%	100%	77%	88%

Table 25: Academic promotion success rates by gender and grade 2013-18\* Scottish campuses

	Female		Male			Female %	Male %
	Applied	Successful	Applied	Successful		Success rate	Success rate
<b>Grade 8</b>	7	4	11	7		57%	64%
	9	6	16	9		67%	56%
	<5	<5	7	<5		100%	43%
	9	<5	6	5		33%	83%
	13	9	11	8		69%	73%
	9	9	13	10		100%	77%
<b>Grade 9</b>	11	7	16	12		64%	75%
	13	10	16	8		77%	50%
	<5	<5	18	12		75%	67%
	7	5	12	8		71%	67%
	12	9	22	13		75%	59%
	10	10	17	14		100%	82%
<b>Grade 10</b>	<5	<5	<5	<5		100%	40%
	<5	<5	8	<5		100%	63%
	<5	<5	7	<5		75%	57%
	<5	<5	7	<5		0%	71%
	7	6	10	<5		86%	50%
	<5	<5	12	7		50%	58%
<b>Total</b>	20	13	32	21		65%	66%
	25	18	40	22		72%	55%
	11	9	34	21		82%	62%
	11	8	26	19		73%	73%
	32	24	43	26		75%	60%
	23	21	42	31		91%	74%

## 6. Heriot-Watt University Employee Profile – Grievance, Disciplinary, Dismissals

*Table 26: Grievance (including harassment) information by school (by PC – gender, ethnicity and disability) 1 January 2018 - 31 December 2018 \* Scottish Campuses only*

Held internally – not for publication as per the Information Commissioner’s Office Anonymisation Code of Practice <https://ico.org.uk/media/1061/anonymisation-code.pdf>

*Table 27: Disciplinary action (including harassment) (by PC – gender, ethnicity and disability) 1 January 2018 - 31 December 2018 \* Scottish Campuses only*

Held internally – not for publication as per the Information Commissioner’s Office Anonymisation Code of Practice <https://ico.org.uk/media/1061/anonymisation-code.pdf>

*Table 28: Dismissals (by PC – gender, ethnicity and disability) 1 January 2018 - 31 December 2018\* Scottish Campuses only*

Held internally – not for publication as per the Information Commissioner’s Office Anonymisation Code of Practice <https://ico.org.uk/media/1061/anonymisation-code.pdf>

*Table 29: Other reasons for leaving (by PC – gender, ethnicity and disability) 1 January 2018 - 31 December 2018 \*Scottish Campuses only*

Held internally – not for publication as per the Information Commissioner’s Office Anonymisation Code of Practice <https://ico.org.uk/media/1061/anonymisation-code.pdf>

7. Heriot-Watt University – Recruitment: Applicants and Accepted roles by Grade, Academic, Professional Services and Protected Characteristic 1st August 2017 to 31st July 2018. *\*Scottish Campuses only*

i. Applicants

Table 30: Applicants: Academic and Professional Service Roles by gender

		No of applicants 1766 Gender		
		Male	Female	Unknown
<b>Academic (t.1625)</b>	Number	1090	432	103
	%	67.1	26.6	6.3
<b>Professional Services (t.141)</b>	Number	73	58	10
	%	51.8	41.1	7.1

Table 31: Applicants - Academic and Professional Service roles by ethnicity

		No of applicants (1766) Ethnicity		
		White	BAME	Unknown
<b>Academic (t.1625)</b>	Number	578	876	171
	%	35.6	53.9	10.5
<b>Professional Services (t.141)</b>	Number	74	53	14
	%	52.5	37.6	9.9

Table 32: Applicants- Academic and Professional Service roles by disability

		No of applicants (1766) Disability		
		Known Disability	No-Known	Information refused
<b>Academic (t.1625)</b>	Number	40	1437	148
	%	2.5	88.4	9.1
<b>Professional Services (t.141)</b>	Number	6	125	10
	%	4.3	88.6	7.1

ii. Accepted

Table 33: Recruitment: Academic and Professional Service Roles by gender

		No of employees recruited (173)		
		Gender		
		Male	Female	Unknown
<b>Academic (t.157)</b>	Number	99	49	9
	%	63.1	31.2	5.7
<b>Professional Services (t.16)</b>	Number	6	8	2
	%	37.5	50	12.5

Table 34: Recruitment - Academic and Professional Service roles by ethnicity

		No of employees recruited (173)		
		Ethnicity		
		White	BAME	Unknown
<b>Academic (t.157)</b>	Number	84	57	16
	%	53.5	36.3	10.2
<b>Professional Services (t.16)</b>	Number	10	4	2
	%	62.5	25	12.5

Table 35: Recruitment- Academic and Professional Service roles by disability

		No of employees recruited (173)		
		Disability		
		Known Disability	No-Known	Information refused
<b>Academic (t.157)</b>	Number	<5	109	44
	%	N/A	69.4	28.1
<b>Professional Services (t.16)</b>	Number	<5	11	5
	%	N/A	68.7	31.3

## 8. Heriot-Watt University – Composition of influential committees 2017-2019

Table 36: University Court Gender Profile

	Female	Female%	Male	Male %
<b>2017-18</b>	12	50	12	50
<b>2018-19</b>	9	36	16	64

Table 37: University Court Ethnicity Profile

	BAME	BAME %	White	White %
<b>2017-18</b>	<5	N/A	24	96
<b>2018-19</b>	<5	N/A	22	88

\* University Court disability data not available

Table 38: University Senate

	Female	Female%	Male	Male %
<b>2017-18</b>	25	38%	41	62%
<b>2018-19</b>	26	38%	42	62%

\* University Senate disability and ethnicity data not available

Table 39: University Executive – BAME composition

	BAME	BAME %	White	White %
<b>2017-18</b>	<5	N/A	26	93%
<b>2018-19</b>	<5	N/A	22	85%

Table 40: University Executive - gender composition

	Female	Female%	Male	Male %
<b>2017-18</b>	6	40%	9	60%
<b>2018-19</b>	6	40%	9	60%

\* University Executive disability data not available

Table 41: University Committee of Learning and Teaching: gender composition

	Female	Female%	Male	Male %
<b>2017-18</b>	6	35%	11	75%
<b>2018-19</b>	6	35%	11	75%

\*UCLT disability and ethnicity data not available

Table 42: University Committee of Research and Innovation – BAME composition

	BAME	BAME %	White	White %
<b>2017-18</b>	<5	N/A	26	93%
<b>2018-19</b>	<5	N/A	22	85%

Table 43: University Committee of Research and Innovation – gender composition

	Female	Female%	Male	Male %
<b>2017-18</b>	11	39%	17	61%
<b>2018-19</b>	11	42%	15	58%

\*UCRI disability data not available

Table 44: Professional Services Leadership Board – BAME composition

	BAME	BAME %	White	White %
2017-18	2	7%	26	93%
2018-19	4	15%	22	85%

Table 45: Professional Services Leadership Board - gender composition

	Female	Female%	Male	Male %
<b>2017-18</b>	11	39%	17	61%
<b>2018-19</b>	11	42%	15	58%

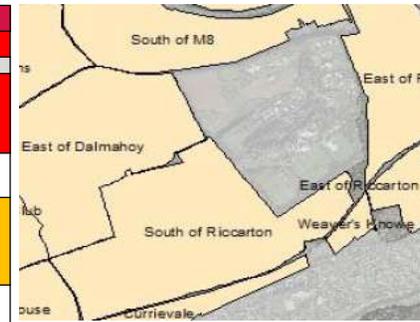
\*PSLB disability and ethnicity data not available

---

**APPENDIX 6 – PEGASUS HOUSING ASSESSMENT SITE PROFORMA**

**South Riccarton - Housing Study Criteria**

Question	Pegasus Comments	Pegasus Scoring	Councils Scoring
1. Does the site fit within an area identified as a strategic development area?	The site is not in an SDA	-1	N
<b>Active Travel</b>			
2. Does the site support travel by foot to identified convenience services?	There is a Co-Op within a 15 minute walk from the site in Currie. Currie is just over a ten minute walk from the nearest edge of the site and has some small local facilities such as a bakery, library, pharmacy, take away and public house. The Council rate the site as 'no' but the development itself could provide facilities and there are some local services within a 15 minute walk from the site.	1	N
3. If not, can foot access be improved or services provided within walking distance through an appropriate intervention which is deliverable in the plan period?	Yes the site could provide facilities and services within the development which turns the above from a no to a potential and why the site then scores a 2.	2	
4. Does the site support travel by foot to identified employment clusters?	The site is adjacent to Heriot-Watt university which is classed as a special economic area. Sighthill is a 33 walk time from the eastern edge of the site where there is a large amount of employment within an industrial estate and houses an extensive amount of employees such as Royal Mail, Tesco and car rental companies. Alternatively, Sighthills can be accessed via a 11 minute cycle journey along established routes.	2	P
5. If not, can foot access be improved or employment provided within walking distance through an appropriate intervention which is deliverable in the plan period?	It is likely that the design of the site will improve connections to these employment areas which would reduce the walk time and increase permeability to and from the site and employment locations.	0	
6. Does the site have access to the wider cycle network?	The site has access to the wider cycle network NCN route 75 which is located south of Currie and can be accessed via a 5 minute cycle journey from the south eastern part of the site adjacent to Curriehill train station. In total the journey to Edinburgh along the NCN 75 route is 7.5 miles that takes approximately 40 minutes cycle time. To the north of the site is the NCN 754 route that can be accessed via Herriot Watt university that takes a similar journey time of 43 minutes (8.4 miles) to Edinburgh city centre. The Quiet Route proposed network 2015 map shows additional routes in close proximity to the site.	1	N
7. If not, is the site potentially served by an identified cycle route intervention project which is deliverable in the plan period?	Development on the site will allow for improved connections to the wider cycle network and improve the ability to reach the surrounding area by bike.	2	
8. Does the site support active travel overall?	The site can provide onsite facilities reducing the need for potential residents to travel beyond the site. The site can also provide and improve connections to existing active travel routes.	2	N
<b>Public Transport</b>			
9. Does the site support travel by public transport?	The site is located directly next to Currie train station and provides regular services to Edinburgh and Glasgow with an approximate journey time of 20 minutes to Edinburgh. The service runs hourly and then every half a hour during peak times. During the site visit that was undertaken midmorning mid week, the car park was overflowing and was visibly well used. The site is also served by a bus service within Currie and Heriot Watt (number 44, 34) and there is a park and ride at Hermiston which is located a 26 minute walk from the eastern part of the site where there are 10 different bus routes departing regularly throughout the day. The PTAL councils evidence assessment scores the site as a 1 even though the train station is adjacent to the site.	2	N
10. If not, is the site potentially served by an identified public transport intervention project which is deliverable in the plan period?	n/a - the site supports public transport travel already.	0	N
<b>Community Infrastructure</b>			
11. Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?	The site is adjacent to the settlement of Currie where parts of the site can access Currie Primary School on Curriehill Road within a 12 minute walk.	1	N
12. Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?	Currie High School on Dolphin Avenue is approximately 20 minutes walk from the site.	1	N
13. If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?	The site has capacity to provide a primary and secondary school within it.	1	N
<b>Landscape Character</b>			
14. Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?	Part of the site has good boundaries such as the University wall and tree lined boundary that adjoins the part of the eastern boundary, the railway line and Murray Burn to the south of the site acts as defensible boundary. The surrounding roads and farmsteads also act as defensible boundaries to the north and east of the site. The site is a logical extension to the settlement and Heriot Watt.	1	P
<b>Green Network</b>			
15. 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?	Development on the site would change the landscape of the area but the site acts a logical extension to the existing settlement.	1	P
<b>Flood Risk</b>			
16. Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?	The SEPA mapping shows the site adjacent to the train station is at medium risk of flooding with the land adjacent to Murray Burn that runs along the south of the site being at high risk of part river flooding and part surface water flooding. There are also some minor areas in the north of the site that are at high risk of surface water flooding, but it is likely that the design can mitigate and reduce the effects.	1	P
<b>Summary</b>			
Summary of site opportunities and constraints	The site scores positively due to its proximity to Curriehill Train station and links to existing train and bus routes can be improved as part of the development. The proposal also promotes active travel via connections to existing networks. The proposal can increase permeability to existing employment hubs as well as providing new retail, educational and local facilities in the site. The site is in close proximity to a primary and secondary school which can be utilised until the onsite educational facilities are provided. Overall the council should reconsider the sites assessment and allocate the site based on the above.	Y	N
<b>Total Score</b>		<b>17</b>	<b>-5</b>



**East of Riccarton - Housing Study Criteria**

Question	Pegasus Comments	Pegasus Scoring	Councils Scoring
1. Does the site fit within an area identified as a strategic development area?	The site is not in an SDA	-1	N
<b>Active Travel</b>			
2. Does the site support travel by foot to identified convenience services?	There is a Co-Op in Currie which is located within a ten minute walk from the south west part of the site. There is a Tesco Superstore in Sighthills on Cutlins Way located within a 15 minute walk from the northern part of the site. There is also a Lidl located a 12 minute walk that is situated within Westside Plaza shopping centre in Wester Hailes where there are other discount stores and local facilities e.g. Post office. The route to both of these requires walking over a bridge with the Edinburgh Bypass so this is unlikely to be a favoured route for pedestrians.	2	P
3. If not, can foot access be improved or services provided within walking distance through an appropriate intervention which is deliverable in the plan period?	It is likely of a site of this scale will provide a convenience store and other local facilities but the site already has existing provision so the scoring is not applicable for this question.	0	
4. Does the site support travel by foot to identified employment clusters?	The site is adjacent to Herriot Watt University campus classed as a special economic area. South Gyle and Sighthills are located a 27 minute walk from the northern part of the site, they have a large amount of employment within an industrial estate and houses an extensive amount of employees such as Royal Mail, Tesco and car rental companies. Wester Hailes shopping facilities are also located a 5 minute walk from the nearest eastern part of the site and contains employment opportunities.	2	P
5. If not, can foot access be improved or employment provided within walking distance through an appropriate intervention which is deliverable in the plan period?	The development of the site will allow for a direct route to these employment locations and will increase permeability.	0	
6. Does the site have access to the wider cycle network?	The NCR754 is located a 3 minute (0.5 miles) cycle journey from the northern part of the site from the site which provides access to Edinburgh city centre approximately 34 minutes (6.3 mile) cycle journey from the site.	2	N
7. If not, is the site potentially served by an identified cycle route intervention project which is deliverable in the plan period?	The site already has existing cycle routes that can be connected to the site.	0	
8. Does the site support active travel overall?	The site supports active travel by being in close proximity to employment, shopping and local facilities. The site would be able to provide additional onsite facilities to serve the development and would promote cycling by its close proximity to existing networks that provide commutable routes to Edinburgh city centre.	2	N
<b>Public Transport</b>			
9. Does the site support travel by public transport?	Wester Hailes Station (one the same line as Curriehill) is located 11 minutes walk away from the sites eastern edge, the train station provides regular routes to Edinburgh and Glasgow that increase in frequency during peak hours. Estimated journey time to Edinburgh is 20 minutes making it easy for commuter access into Edinburgh. Pedestrian routes to the station from the site require the use of a bridge over The City of Edinburgh Bypass. Alternatively to the east of the site is Curriehill train station a 20 minute (1 mile) walk from the site. Hermiston Park and Ride Scheme is adjacent to the north west of the site and provides 10 frequent bus services across the region.	2	N
10. If not, is the site potentially served by an identified public transport intervention project which is deliverable in the plan period?	n/a - the site supports public transport travel already.	0	N
<b>Community Infrastructure</b>			
11. Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?	Slighthill Primary School, Calder Park is the closest school to the site and it is approximately a 10 minute (0.5 mile) walk from the northern part of the site. The walk requires crossing The City of Edinburgh bypass via a bridge which is not attractive for people especially for adults with young children. There is an alternate primary school in Juniper Green which is 14 minute (0.6 mile) mile walk from the southern part of the site. Canal View Primary School in Wester Hailes, Clovenstone Primary School in Clovenstone and Currie Primary School are located to the east of the site and are within a 15 minute walk.	2	N
12. Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?	Currie Secondary School is approximately 1 mile from the west of the site and Darroch Secondary school is located within a ten minute walk (0.6 mile) from the southern part of the site.	1	N
13. If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?	The has some educational provision nearby but for secondary schools the proximity is over the councils 800m/ 10 minute walk radius. It is likely that the site may provide primary and secondary educational facilities.	1	P
<b>Landscape Character</b>			
14. Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?	The site would join the settlements at Baberton to the north but the site is well contained by the railway line to the south, A720 bypass to the east that separates the site from Wester Hailes, the A71 to the north acts as a strong boundary and Heriot Watt to west is a strong defensible boundary.	1	Y
<b>Green Network</b>			
15. 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?	The site would act as a logical extension to the settlement and connect to existing urban development but this would result in a small loss of landscape.	1	P
<b>Flood Risk</b>			
16. Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?	The site has a Burn running through it from west to east and the SEPA mapping shows along this area the site is at high risk of river flooding. Flood mitigation measures could be implemented but due to this being in the centre of the site it would result in a loss of developable area.	1	P
<b>Summary</b>			
Summary of site opportunities and constraints	The site has access to convenience stores to the west and east. Permeability to the east is limited as the A720 acts as physical obstacle and isn't a preferred pedestrian option, however there are a large range of facilities at Sighthills which takes around a 15 minute walk. The site is supported by cycle routes in close proximity and overall the site supports active travel to local amenities and employment. The site is well connected to good existing public transport infrastructure. Overall the site is a sustainable location and is well contained. Parts of the site are susceptible to flood risk but it is likely that these can be overcome through the design and layout. The site based on the above should be allocated for development.	Y	Y
<b>Total Score</b>		<b>16</b>	<b>0</b>



Kirkliston - Housing Study Criteria

Craigbrae



North Kirkliston



Question	Pegasus Comments - Craigbrae	Pegasus Scoring	Councils Scoring	Pegasus Comments - North Kirkliston	Pegasus Scoring	Councils Scoring
1. Does the site fit within an area identified as a strategic development area?	The site is not in an SDA	-1	N	The site is not in an SDA	-1	N
<b>Active Travel</b>						
2. Does the site support travel by foot to identified convenience services?	The site is located 15 minutes walk (800m from the western site boundary) from Co-Op in Kirkliston and does therefore not meet the councils criteria.	-1	P	The site is located 12 minutes walk (900m from the eastern site boundary) from Co-Op in Kirkliston and does therefore not meet the councils criteria.	-1	P
3. If not, can foot access be improved or services provided within walking distance through an appropriate intervention which is deliverable in the plan period?	There is a limited shopping provision within Kirkliston so an increase in development may trigger the need for a new convenience store. The development could provide a connecting footpath through the existing development to shorten the journey time.	1		There is a limited shopping provision within Kirkliston so an increase in development may trigger the need for a new convenience store.	1	
4. Does the site support travel by foot to identified employment clusters?	There are no employment clusters within 30 minutes from the site so the site does not support travel by foot to employment.	-1	N	There are no employment clusters within 30 minutes from the site so the site does not support travel by foot to employment.	-1	N
5. If not, can foot access be improved or employment provided within walking distance through an appropriate intervention which is deliverable in the plan period?	There are no employment clusters close by for the site to provide walking access too, however the site could provide some local shops and facilities which would create some employment.	1		There are no employment clusters close by for the site to provide walking access too, however the site could provide some local shops and facilities which would create some employment.	1	
6. Does the site have access to the wider cycle network?	Neither the NCN or the proposed Quiet Route is in close proximity to the site.	-1	N	Neither the NCN or the proposed Quiet Route is in close proximity to the site.	-1	N
7. If not, is the site potentially served by an identified cycle route intervention project which is deliverable in the plan period?	Doesn't seem any logical connections to the network due to its remote proximity. There is a footpath that links the site to Newbridge but this would take over 40 minutes walking and it isn't an established cycle path with hard pathways so would unlikely to be used by commuters to Newbridge.	-1		Doesn't seem any logical connections to the network due to its remote proximity.	-1	
8. Does the site support active travel overall?	The site does not support active travel as there is no nearby facilities or employment and the site heavily relies on travel via car and would increase traffic on already congested areas at the junction of Queensferry Road, Main Street and Station Road.	-1	N	The site does not support active travel as there is no nearby facilities or employment and the site heavily relies on travel via car and would increase traffic on already congested areas at the junction of Queensferry Road, Main Street and Station Road.	-1	N
<b>Public Transport</b>						
9. Does the site support travel by public transport?	There is a bus stop on Eilston Road which runs hourly services to Glasgow, Riccarton and Queensferry (with higher frequencies to Queensferry around 8/9 am). There is no other public transport near to the site.	-1	N	There is a bus stop on Eilston Road which runs hourly services to Glasgow, Riccarton and Queensferry (with higher frequencies to Queensferry around 8/9 am). There is no other public transport near to the site.	-1	N
10. If not, is the site potentially served by an identified public transport intervention project which is deliverable in the plan period?	The site could add a new bus route around the development or add a station on the existing railway line to the north of the site.	1	N	The site could add a new bus route around the development or add a station on the existing railway line to the north of the site.	1	N
<b>Community Infrastructure</b>						
11. Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?	Kirkliston Primary school is the only primary school in the area and it is located around a 19 minute (0.9 mile) walk from the closest edge of the site. There is a pre-school/ nursery a 12 minute walk from the site.	-1	N	Kirkliston Primary school is the only primary school in the area and it is located around a 19 minute (0.9 mile) walk from the closest edge of the site. There is a pre-school/ nursery a 7 minute walk from the site.	-1	N
12. Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?	The nearest secondary school is 3.5km in Queensferry High School	-1	N	The nearest secondary school is 3.5km in Queensferry High School	-1	N
13. If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?	The site may be able to provide a primary school and secondary school as there has been a large amount of housing development in the area but currently the site does not have good educational provision.	1	P	The site may be able to provide a primary school and secondary school as there has been a large amount of housing development in the area but currently the site does not have good educational provision.	1	P
<b>Landscape Character</b>						
14. Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?	The development on the site would sprawl Kirkliston to the east, this can be partially contained by the M90, railway line and Burnshot Road and extend the current housing development in north east Kirkliston	1	N	Development of the site would be an extension to the north of Kirkliston and could be well contained by the M90, B800 and railway line preventing further sprawl.	2	N
<b>Green Network</b>						
15. 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?	Green network located to the south west of Kirkliston and could be linked	1	P	Green network located to the south west of Kirkliston and could be linked	1	P
<b>Flood Risk</b>						
16. Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?	The site is not located in a flood zone according to SEPA and Magic Maps. The councils ES says half the site is within 1 in 200 year flood zone but the flood risk map doesn't show this, however the site is scored positively in this assessment.	1	Y	The site is not located in a flood zone according to SEPA and Magic Maps. The councils assessment for the ES states that the site is within a catchment area for a river or burn, where there is known to be engineered alterations to the river and the site should take into account the reduced resilience of this river.	1	Y
<b>Summary</b>						
Summary of site opportunities and constraints	The site acts a logical extension to the settlement of Kirkliston to the east to some extent but due to the limited facilities in the area the council should discount this site. There is only one convenience store serving the whole of Kirkliston and the site does not promote active travel due to the lack of cycle routes and proximity to employment. The only means of public transport is via a bus that runs hourly meaning that the site relies heavily on car ownership/usage in order to achieve basic needs such as work, shopping and education. Overall the site is not a sustainable location for development. The site based on the above should not be allocated for development.	N	Y	The site acts a logical extension to the settlement of Kirkliston to the east to some extent but due to the limited facilities in the area the council should discount this site. There is only one convenience store serving the whole of Kirkliston and the site does not promote active travel due to the lack of cycle routes and proximity to employment. The only means of public transport is via a bus that runs hourly meaning that the site relies heavily on car ownership/usage in order to achieve basic needs such as work, shopping and education. Overall the site is not a sustainable location for development. The site based on the above should not be allocated for development.	N	Y
	<b>Total Score</b>	<b>-2</b>	<b>-4</b>	<b>Total Score</b>	<b>-1</b>	<b>-4</b>

West Edinburgh - Housing Study Criteria

Question	Pegasus Comments	Pegasus Scoring	Councils Scoring
1. Does the site fit within an area identified as a strategic development area?	Yes the site is within West Edinburgh SDA.	2	Y
<b>Active Travel</b>			
2. Does the site support travel by foot to identified convenience services?	There is a small M&S Simply Food store that is attached to a BP garage on Glasgow Road that is adjacent to the northern boundary of the site. To the east of the site there is a Scotmid located 10 minutes from the closest western part of the site, to the east of the site there is a Tesco Express around a 13 minute walk from the closest eastern part of the site, both of these are not in convenient locations for the centre of the development. This leaves the M&S on Glasgow Road which is likely to serve the population of the site.	1	P
3. If not, can foot access be improved or services provided within walking distance through an appropriate intervention which is deliverable in the plan period?	It is likely due to the scale of the development that the site would provide a convenience store to serve the new residents for shops to be provided as part of the development, adjacent to the site on Glasgow Road the land is allocated for employment in the current Local Plan so has potential to provide a convenience store.	2	
4. Does the site support travel by foot to identified employment clusters?	Currently surrounding the site there is an employment cluster at Ratho and Newbridge which is to the east of the site. From the closest site boundary edge in the east the employment in Ratho is a 10 minute walk however from the western edge the employment is a 40 minute walk away. The employment north of Newbridge is a 30 minute walk from the site along Glasgow Road. The direct walking route is along Glasgow Road which is a busy road, to get to Newbridge on the opposite side of the M9 requires going over this road via a bridge/roundabout, the roundabout gets very congested as it is a motorway junction for the M9 and isn't pedestrian friendly. There is a small footbridge over the motorway but this isn't appealing to pedestrians. Due to this it is unlikely that residents would walk from the site to Newbridge.	1	P
5. If not, can foot access be improved or employment provided within walking distance through an appropriate intervention which is deliverable in the plan period?	Opposite the site, north of Glasgow Road, the land has been allocated for employment in the current local plan for an International Business Gateway as part of Edinburgh Airport, but there have been no plans submitted to date.	0	
6. Does the site have access to the wider cycle network?	The site isn't in close proximity to the NCN there is a small footpath on the site of Glasgow Road but this is not very practical as going west towards Kirkkliston the path disappears and requires crossing the road and using the pedestrian bridge over the M9, this road is very congested and is a motorway junction so not a desired cycling route. Going east along Glasgow Road the small path continues. The site has cycling opportunities but these are not the best in quality or permeability.	1	P
7. If not, is the site potentially served by an identified cycle route intervention project which is deliverable in the plan period?		0	
8. Does the site support active travel overall?	The site has potential to promote active travel if the surrounding infrastructure and connections were improved. The site is in a location close to employment but permeability is an issue.	1	P
<b>Public Transport</b>			
9. Does the site support travel by public transport?	To the north of the site is a tram stop at Ingliston Park and Ride which provides a frequent service to the airport and into Edinburgh city centre with an approx. Journey time of 36 minutes. From the closest part of the site the tram stop is located a 10 minute walk, the route to the tram stop requires crossing busy roads and going under the A8 which is pedestrian friendly. There is a train station at Edinburgh Gateway but this is a 30 minute walk from the closest western edge of the site, the tram does stop at this station that provides services to Edinburgh, Glenrothes with Thornton, Perth and Arbroath. There is a bus stop along Glasgow Road (Ingliston Showground) within a 10 minute walk, adjacent to the site which provide frequent intercity and wider area routes via 12 different services.	1	N
10. If not, is the site potentially served by an identified public transport intervention project which is deliverable in the plan period?	The site could be improved if the tram stop was extended further to the east towards Newbridge or if the walking route was improved for this would boost the score for this criteria. The development at IBG and at the Royal Highland Showground may improve the accessibility to public transport using the existing services.	2	Y
<b>Community Infrastructure</b>			
11. Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?	Hillwood Primary School is the only primary school within 3km of the site and is approximately a 10 minute walk from the western and nearest boundary edge. There are no others within a 3km radius of the site.	1	N
12. Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?	The nearest secondary school is Craigmount High School in Corstophine which is over 3.3km from the nearest eastern site edge, equating to a 45 minute walk along Glasgow Road.	-1	N
13. If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?	The site could be improved by including a primary and secondary school to accommodate the new pupils that would be attending Hillwood Primary School and secondary school would also be needed as there is not one in close proximity to the site. The council's assessment echoed this and said that the preference would be a secondary school for 1200 pupils.	1	P
<b>Landscape Character</b>			
14. Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?	The site would be visible from Glasgow Road due to the topography of the site rising towards the south. The site could be a logical extension of Ratho to the east and has well established boundaries to the north (Glasgow Road), south (railway line) and to the east (existing settlement). To the west there would need to be boundaries established to prevent the site merging the extension of Ratho into Gogar and Milburn Tower.	1	P
<b>Green Network</b>			
15. 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?	The site could improve the green network but could impact the green space at Gogarburn Golf Club.	1	P
<b>Flood Risk</b>			
16. Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?	The site has some small minor areas that are at high risk of surface water flooding on the SEPA mapping. The site is scored 'X' in the ES but 'P' in the HS.	1	P
<b>Summary</b>			
Summary of site opportunities and constraints	The site has limited convenience store facilities in close proximity. There are some employment clusters relatively close to the site that could promote active travel however the physical constraints of road layouts and the lack of active travel friendly infrastructure e.g. cycle paths make it unlikely as it stands that residents would use active travel to get to these locations. There are plans for employment development at IBG but these have not commenced. The site has good bus transport links but despite the tram station being in close proximity it is the physical walking boundaries that mean pedestrians are unlikely to use these routes. Education provision is also sparse and would need to be improved as part of the development. The site as it stands relies on mainly car usage but improvements to the area including the IBG development would overcome this. The site based on the above and noting the improvements should be allocated.	Y	Y
<b>Total Score</b>		<b>15</b>	<b>9</b>



Calderwood - Housing Study Criteria

Overshiel



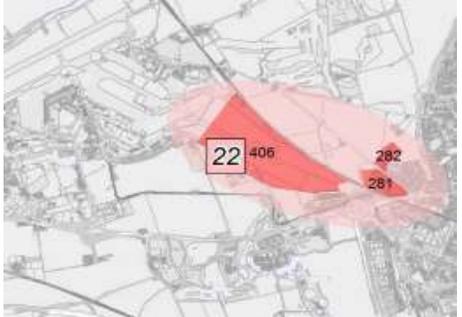
Bonnington



Question	Pegasus Comments	Pegasus Scoring	Councils Scoring	Pegasus Comments (if second parcel)	Pegasus Scoring	Councils Scoring
1. Does the site fit within an area identified as a strategic development area?	The site is not in an SDA	-1	N	The site is not in an SDA	-1	N
<b>Active Travel</b>						
2. Does the site support travel by foot to identified convenience services?	There are no convenience stores or local facilities within the area, the closest shop is a Co-Op located a 30 minute walk from the nearest site edge. The council's assessment states that there is a convenience store within the master plan for the adjacent development that is within West Lothian council, however this is yet to be built out and there are no other	-1	Y	There are no convenience stores or local facilities within the area, the closest shop is a Co-Op located a 30 minute walk from the nearest site edge. The council's assessment states that there is a convenience store within the master plan for the adjacent development that is within West Lothian council, however this is yet to be built out and there are no other	-1	P
3. If not, can foot access be improved or services provided within walking distance through an appropriate intervention which is deliverable in the plan period?	The site has potential to accommodate a convenience store but there are no other local facilities in the area so improving foot access would not be beneficial until there are other facilities.	-1		The site has potential to accommodate a convenience store but there are no other local facilities in the area so improving foot access would not be beneficial until there are other facilities.	-1	
4. Does the site support travel by foot to identified employment clusters?	There are no employment clusters in close proximity to the site.	-1	N	There are no employment clusters in close proximity to the site.	-1	N
5. If not, can foot access be improved or employment provided within walking distance through an appropriate intervention which is deliverable in the plan period?	Potentially if there was employment provided within the development/nearby	1		Potentially if there was employment provided within the development/nearby	1	
6. Does the site have access to the wider cycle network?	The site could be connected to the cycle network to the north (NCN 72) along the River Almond but to get into Edinburgh the route is around 13 miles and would take over an hour, Livingston can be accessed 20 minutes by cycling. It is unlikely that commuters would use the NCN route as it is along a river and woodland. The alternate route to Livingston is along the B7015 which does not have a cycle lane and is complex and not direct	0	N	The site could be connected to the cycle network to the north (NCN 72) along the River Almond but to get into Edinburgh the route is around 13 miles and would take over an hour, Livingston can be accessed 20 minutes by cycling. It is unlikely that commuters would use the NCN route as it is along a river and woodland. The alternate route to Livingston is along the B7015 which does not have a cycle lane and is complex and not direct	0	N
7. If not, is the site potentially served by an identified cycle route intervention project which is deliverable in the plan period?		0			0	
8. Does the site support active travel overall?	The site is very far out from local services and employment, the nearest settlement with employment and facilities is in Livingston but this is over an hours walk from the site and the cycle routes are not straight forward. Due to the lack of amenities in walking distance, the site heavily relies on cars.	-1	N	The site is very far out from local services and employment, the nearest settlement with employment and facilities is in Livingston but this is over an hours walk from the site and the cycle routes are not straight forward. Due to the lack of amenities in walking distance, the site heavily relies on cars.	-1	N
<b>Public Transport</b>						
9. Does the site support travel by public transport?	The nearest bus stop is a 11 minute walk from the closest edge of the site on the B7015 at Camps Industrial Estate. There is a service (X27) that runs hourly and then every thirty between 9am until 3pm and runs until 7pm. The journey time to Edinburgh is around 40 minutes however at peak times it is sometimes a longer duration due to traffic and no bus lane on the A71 into the city centre. The bus journey time to Livingston (X27) is around 25 minutes. Kirknewton train station is the nearest railway station and is around a 35 minute walk from the nearest edge of the site so it is unlikely that people who lived in the site would walk to the station.	-1	N	The nearest bus stop is a 11 minute walk from the closest edge of the site on the B7015 at Camps Industrial Estate. There is a service (X27) that runs hourly and then every thirty between 9am until 3pm and runs until 7pm. The journey time to Edinburgh is around 40 minutes however at peak times it is sometimes a longer duration due to traffic and no bus lane on the A71 into the city centre. The bus journey time to Livingston (X27) is around 25 minutes. Kirknewton train station is the nearest railway station and is around a 35 minute walk from the nearest edge of the site so it is unlikely that people who lived in the site would walk to the station.	-1	N
10. If not, is the site potentially served by an identified public transport intervention project which is deliverable in the plan period?	Unlikely that the development would benefit from a public transport intervention project. A bus lane may reduce the journey time into Edinburgh and a more frequent service but it is likely that people will use their own car.	-1	N	Unlikely that the development would benefit from a public transport intervention project. A bus lane may reduce the journey time into Edinburgh and a more frequent service but it is likely that people will use their own car.	-1	N
<b>Community Infrastructure</b>						
11. Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?	St Pauls Primary school in East Calder is the closest primary school to the site, located around a 24 minute walk from site. It is likely that the adjacent development will provide a primary school to serve its community but this is not built out. The council don't provide any details on this due to it being within a West Lothian school catchment area.	-1	n/a	St Pauls Primary school in East Calder is the closest primary school to the site, located around a 24 minute walk from site. It is likely that the adjacent development will provide a primary school to serve its community but this is not built out. The council don't provide any details on this due to it being within a West Lothian school catchment area.	-1	N
12. Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?	There are 4 secondary schools in Livingston but to access these via active travel it would take 1 hour 30 to walk and around 30 minutes to cycle from the nearest edge of the site.	-1	n/a	There are 4 secondary schools in Livingston but to access these via active travel it would take 1 hour 30 to walk and around 30 minutes to cycle from the nearest edge of the site.	-1	N
13. If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?	A primary and secondary school could be provided within the site but the adjacent site should not be relied on for providing a school due to it being within a different council which may limit the catchment to those within that authority.	1	P	A primary and secondary school could be provided within the site but the adjacent site should not be relied on for providing a school due to it being within a different council which may limit the catchment to those within that authority.	1	P
<b>Landscape Character</b>						
14. Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?	The site is very much a rural area and is very isolated from other amenities so the site would have a significant impact on the rural landscape despite the adjacent development. The council assessment also notes this but justifies the development by saying it will change due to the adjacent development.	-1	N	The site is very much a rural area and is very isolated from other amenities so the site would have a significant impact on the rural landscape despite the adjacent development. This is a large parcel and wouldn't act as a strategic extension to the development being built out within West Lothian. The council assessment also notes this but justifies the development by saying it will change due to the adjacent development.	-1	N
<b>Green Network</b>						
15. 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?	Due to the rural character of the area the site has the potential to connect and improve green space, especially along the River Almond to the north of the site but this should override the vast loss of landscape that developing the site would have.	1	P	Due to the rural character of the area the site has the potential to connect and improve green space, especially along the River Almond to the north of the site but this should override the vast loss of landscape that developing the site would have.	1	P
<b>Flood Risk</b>						
16. Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?	The SEPA map shows that a few parts of the site are at risk of surface water flooding but these are not large areas and would not significantly impact the developable area.	1	Y	The SEPA map shows that small parts of the site are at risk of surface water flooding but these are not large areas and can be mitigated through the design. The council in the ES rate the site for flooding as '1' in the ES but then rate it as '2' here.	1	Y
<b>Summary</b>						
Summary of site opportunities and constraints	The site does not have any community facilities within the area such as shops and schools. The site is reliant on development that may come about from the adjacent development that it currently under construction. However, even with this development the site is not in close proximity to local settlements. Employment locations are not within walking distance and transport is limited to one bus service. Overall the is not sustainable and supports car usage. Development in such a rural area would impact the landscape and green network along the River Almond. The council	N	Y	The site does not have any community facilities within the area such as shops and schools. The site is reliant on development that may come about from the adjacent development that it currently under construction. However, even with this development the site is not in close proximity to local settlements. Employment locations are not within walking distance and transport is limited to one bus service. Overall the is not sustainable and supports car usage. Development in such a rural area would impact the landscape and green network along the River Almond. The council	N	Y
<b>Total Score</b>		<b>-6</b>	<b>-1</b>	<b>Total Score</b>	<b>-6</b>	<b>-4</b>

**Crosswinds - Housing Study Criteria**

Question	Pegasus Comments	Pegasus Scoring	Councils Scoring
Does the site fit within an area identified as a strategic development area?	Yes the site is within an SDA.	2	n/a
<b>Active Travel</b>			
Does the site support travel by foot to identified convenience services?	Tesco Express by the RBS headquarters is located a 15 minute walk from the closest site edge. There is a Morrisons adjacent to Gyle shopping centre located around a 15 minute walk from the sites closest edge. To get to either Morrisons or Tesco Express the walk involves crossing Glasgow Road via Gogar Roundabout, this is a major interchange where the Edinburgh Bypass meets Glasgow Road so is not pleasant for pedestrians.	-1	Y
If not, can foot access be improved or services provided within walking distance through an appropriate intervention which is deliverable in the plan period?	Walking links to Gyle Shopping centre and Morrisons next to the centre to promote the use of existing facilities via walking as they are within walking distance it is the physical constraints hindering this.	1	
Does the site support travel by foot to identified employment clusters?	There is employment in close proximity to the site at Gyle which is within a 15 minute walk from the closest edge of the site. There is potential development at the Edinburgh International Business Gateway to the west of the site but this is yet to commence.	2	Y
If not, can foot access be improved or employment provided within walking distance through an appropriate intervention which is deliverable in the plan period?	n/a - the site has good access to employment	0	
Does the site have access to the wider cycle network?	There are some footpaths along Glasgow Road that provide walking and cycling routes towards Gyle and Corstorphine - the routes could be better as currently it involves crossing Glasgow Road to get to Gyle or walking alongside Glasgow Road to get to Corstorphine which is a busy road with two lanes each way. To cycle to Edinburgh city centre along Glasgow Road would take around 30 minutes (5.7 miles) by bike. The site does not have access to the NCN.	1	Y
If not, is the site potentially served by an identified cycle route intervention project which is deliverable in the plan period?		0	
Does the site support active travel overall?	The site is in a good location for connections to Gyle which has both employment sites and shopping facilities.	1	Y
<b>Public Transport</b>			
Does the site support travel by public transport?	Edinburgh airport tram stop and Edinburgh gateway provides tram and train services that are adjacent to the site around a 3 minute walk away. The train station provides frequent connections to Edinburgh, Dundee, Perth and Inverness with the Tram providing a frequent service to Edinburgh city centre. There is a bus stop at Maybury on Glasgow Road (around a 10 minute walk) where there are 10 services that operate frequently around the area.	2	P
If not, is the site potentially served by an identified public transport intervention project which is deliverable in the plan period?	n/a - the site has good access to public transport	0	n/a
<b>Community Infrastructure</b>			
Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?	East Craigs Primary School is the nearest primary school to the site and it's a 30 minute walk from the nearest boundary.	-1	N
Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?	Craigmount High School is the nearest secondary school and is located around a 20 minute walk from the site.	-1	N
If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?	The site could provide a primary school within it or the neighbouring IBG development could.	1	P
<b>Landscape Character</b>			
Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?	The site is currently brownfield and there is a large amount of employment in the area, however it could have noise issues for potential residents being located adjacent to a runway.	2	n/a
<b>Green Network</b>			
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?	The site would not result in a loss of landscape due to it being a brownfield site.	1	n/a
<b>Flood Risk</b>			
Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?	The southern boundary of the site is at high risk of river flooding but it is likely that this can be mitigated through the design and would not result in a loss of developable area.	1	P
<b>Summary</b>			
Summary of site opportunities and constraints	The site is in close proximity to employment and shopping facilities but these routes could be improved to make them more pedestrian friendly to promote active travel and promote cycling to Edinburgh city centre. The site scores poorly on education provision and facilities should be provided within the site. The site is well connected by public transport. The site could have noise implications for future residents but its brownfield status is beneficial and therefore the site should be considered for development noting the improvements above.	Y	P
<b>Total Score</b>		<b>11</b>	<b>9</b>



**EDINBURGH CHOICES FOR CITY PLAN - HOUSING STUDY SUMMARY TABLE (COUNCIL AND PEGASUS GROUP SITE ASSESSMENTS)**

Council Scoring		Pegasus Scoring																				
Yes (Y)		Positive (2)																				
No (N)		Negative (-1)																				
Partial (P)		Partial (1)																				
Neutral / Not Assessed		Neutral (0)																				
Site Name	Housing Topic	SDA	Active Travel								Public Transport		Community Infrastructure			Landscape Character	Green Network	Flood Risk	Site Score	Collated Council	Collated Pegasus	Allocate (Yes / No)
	Question Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16					
South Riccarton	Council	N	N		P		N		N	N	N	N	N	N	P	P	P	-5	-5	17	N	
	Pegasus	-1	1	2	2	0	1	2	2	2	0	1	1	1	1	1	1	17			Y	
East of Riccarton	Council	N	P		P		N		N	N	N	N	N	P	Y	P	P	0	0	16	Y	
	Pegasus	-1	2	0	2	0	2	0	2	2	0	2	1	1	1	1	1	16			Y	
Craigbrae (Kirkliston)	Council	N	P		N		N		N	N	N	N	N	P	N	P	Y	-4	-4	-1.5	Y	
	Pegasus	-1	-1	1	-1	1	-1	-1	-1	-1	1	-1	-1	1	1	1	1	-2			N	
North Kirkliston (Kirkliston)	Council	N	P		N		N		N	N	N	N	N	P	N	P	Y	-4	-4	-1.5	Y	
	Pegasus	-1	-1	1	-1	1	-1	-1	-1	-1	1	-1	-1	1	2	1	1	-1			N	
Norton Park (West Edinburgh)	Council	Y	P		P		P		P	N	Y	N	N	P	P	P	P	9	9	15	Y	
	Pegasus	2	1	2	1	0	1	0	1	1	2	1	-1	1	1	1	1	15			Y	
Overshield (Calderwood)	Council	N	Y		N		N		N	N	N	N/A	N/A	P	N	P	Y	-1	-2.5	-6	Y	
	Pegasus	-1	-1	-1	-1	1	0	0	-1	-1	-1	-1	-1	1	-1	1	1	-6			N	
Bonnington (Calderwood)	Council	N	P		N		N		N	N	N	N	N	P	N	P	Y	-4	-4	-6	Y	
	Pegasus	-1	-1	-1	-1	1	0	0	-1	-1	-1	-1	-1	1	-1	1	1	-6			N	
Crosswinds	Council	N/A	Y		Y		Y		Y	P	N/A	N	N	P	N/A	N/A	P	9	9	11	P	
	Pegasus	2	-1	1	2	0	1	0	1	2	0	-1	-1	1	2	1	1	11			Y	

**Reference Question**

- Does the site fit within an area identified as a strategic development area?
- Does the site support travel by foot to identified convenience services?
- If not, can foot access be improved or services provided within walking distance through an appropriate intervention which is deliverable in the plan period?
- Does the site support travel by foot to identified employment clusters?
- If not, can foot access be improved or employment provided within walking distance through an appropriate intervention which is deliverable in the plan period?
- Does the site have access to the wider cycle network?
- If not, is the site potentially served by an identified cycle route intervention project which is deliverable in the plan period?
- Does the site support active travel overall?
- Does the site support travel by public transport?
- If not, is the site potentially served by an identified public transport intervention project which is deliverable in the plan period?
- Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?
- Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?
- If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?
- Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?
- 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?
- Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?



**CHOICES FOR CITY PLAN 2030 – WEST  
EDINBURGH - A CRITIQUE OF THE EVIDENCE BASE**

**ON BEHALF OF WALLACE LAND INVESTMENTS  
REPRESENTING SITE 'SOUTH OF RICCARTON'**

Date: 30<sup>th</sup> April 2020

Pegasus Reference: ST/GL/P20-0337/R001v7

**Pegasus Group**

Queens House | Queen Street | Manchester | M2 5HT

**T** 0161 393 3399 | **W** [www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough

**DESIGN** | **ENVIRONMENT** | **PLANNING** | **ECONOMICS** | **HERITAGE**

© Copyright Pegasus Planning Group Limited. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited.

## CONTENTS

EXECUTIVE SUMMARY .....	2
1. INTRODUCTION.....	8
2. STRATEGIC ENVIRONMENTAL ASSESSMENT PROCESS & OBLIGATIONS .....	10
3. CRITIQUE OF TRANSPORT EVIDENCE BASE .....	20
4. CRITIQUE OF THE LANDSCAPE AND VISUAL IMPACT ASSESSMENT.....	27
5. CRITIQUE OF THE ENVIRONMENTAL REPORT .....	30
6. CRITIQUE OF THE HOUSING STUDY.....	38
7. CONCLUSIONS .....	50
APPENDIX 1 – COMPARATIVE PROFORMA ASSESSMENT QUESTIONS .....	53
APPENDIX 2 – LANDSCAPE ASSESSMENTS OF WEST EDINBURGH GREENFIELD SITES .....	54
APPENDIX 3 – PEGASUS ENVIRONMENTAL ASSESSMENT SITE PROFORMA .....	55
APPENDIX 4 – GOVERNMENT REPORT – EDUCATION DEVELOPER CONTRIBUTIONS.....	56
APPENDIX 5 – HERIOT-WATT EMPLOYEE INFORMATION.....	57
APPENDIX 6 – PEGASUS HOUSING ASSESSMENT SITE PROFORMA.....	58

---

## **EXECUTIVE SUMMARY**

These representations have been prepared on behalf of Wallace Land Investments (Wallace) in relation to the Edinburgh Choices for City Plan 2030 and associated evidence, focussing on how sites in west Edinburgh have been considered and assessed, particularly the site represented by Wallace 'South of Riccarton', which is a sustainably located site capable of accommodating a mix of up to 3,600 new homes, new schools, a local centre, and a transport hub directly next to Curriehill train station and Heriot-Watt University/employment cluster.

These representations consider and assess the Council's evidence base documents supporting the Choices for City Plan with a specific focus on west Edinburgh and should be read in conjunction with the further representations submitted on South of Riccarton by Geddes Consulting on behalf of Wallace.

### **Strategic Environmental Assessment Process & Obligations (Section 2)**

The Council's Environmental Assessment paper fails to comply with Article 5(1) of the SEA and associated Scottish Law Directive because all reasonable alternative greenfield sites are not assessed. Without such an assessment it cannot be shown that the sites chosen are the most suitable.

All greenfield sites were appraised under the Council's Housing Study background paper however this omits several critical environmental considerations including ecological designations and habitats. The Housing Study also gives favourable treatment to preferred sites through the application of site-specific mitigation (e.g. convenience service provision, education facilities and public transport interventions), but not to other reasonable alternatives, further undermining the outcomes of the Environmental Report.

Therefore, alternative greenfield sites have not been assessed by a compliant SEA as this is reliant on the findings of this incomplete and biased Housing Study.

Paragraph 274 of the Scottish Planning Policy (SPP) confirms that the site selection and the SEA process should be informed by a robust assessment of public transport provision. However, the Housing Study is not transparent in relation to how the site accessibility scores are generated. The assessment criteria are related to the outcomes of the Edinburgh Strategic Sustainable Transport Study (ESSTS) however this is based on wider transport corridors and not specific sites. As such, we can only assume there is another assessment available to the Council that does review the accessibility score of each site in the Housing Study but this has not been made publicly available for consultation.

Wallace's site South of Riccarton is located within Sustainable Transport Corridor 8 West of Hermiston in the ESSTS (Figure 9.1). However, map 3 within the Choices for City Plan is inaccurate as it does not align with Corridor 8 as depicted in the ESSTS, as it excludes the land parcel South

of Riccarton and existing Curriehill train station. This critical error may well have influenced the accessibility judgements made towards South of Riccarton, which would further undermine the overall SEA process.

Finally, the outcome of the West Edinburgh's Spatial Strategy, commissioned by the Council, Scottish Government, Scottish Future's Trust and Scottish Enterprise, and being undertaken by Rettie, Aecom and Collective Architecture, is not yet known. In addition, the ESSTS is not yet complete, with the second stage assessment understood to still be progressed by Jacobs. It is therefore premature for the Choices for City Plan 2030 to include proposed site allocations in west Edinburgh (or at the very least without reasonable alternatives), given that the evidence base to justify the spatial strategy is incomplete.

The findings of these studies should form a key part of the Council's evidence base for selecting sites in west Edinburgh and therefore the current site choices are premature, particularly given the multiple flaws in the existing evidence base as highlighted above. Wallace therefore objects to all proposed sites in west Edinburgh at the present time.

### **Critique Of Council's Transport Evidence Base (Section 3)**

Paragraph 274 of the SPP does not distinguish between the different modes of transport that a Transport Appraisal should consider. The ESSTS fails to adequately consider existing capacity of rail infrastructure in Edinburgh, instead focussing on new tram or bus rapid transit interventions. The transport evidence base is therefore not sufficiently thorough to determine the most sustainable spatial and site development choices for Edinburgh. This could have affected the Council's consideration of Corridor 8 – West of Hermiston as a sustainable transport corridor, which unlike other corridors does not require major intervention, as it already benefits from Curriehill train station on an electrified main line.

The ESSTS also erroneously states that Curriehill train station is an hourly service, when it is actually half hourly in peak hours. This error looks to have affected the consideration of South of Riccarton as a sustainable location for public transport, as the Housing Study scores South of Riccarton as "*Red – No - The site does not support travel by public transport based on existing or incrementally improved provision*". This suggests that Curriehill Train Station has been omitted from the Council's site assessment. This is despite the fact that South of Riccarton is the only greenfield site in west Edinburgh that is directly adjacent to an existing main line train station, which Wallace are proposing to enhance into a transport hub with Bus Rapid Transit interchange and a park and ride, which is all deliverable within the LDP timeframe.

The ESSTS recognises this opportunity for new transit solutions within Corridor 8, which includes South of Riccarton, as it is one of four corridors considered for further assessment (along with Corridors 3, 6 and 7); however the Choices for City Plan 2030 has only identified two corridors, 3- 'South East Edinburgh via BioQuarter' and 7- 'Towards Newbridge and IBG', for further assessment

without sufficient justification as to why these are preferred and why corridor 8 has been discounted.

#### **Critique Of The Landscape And Visual Impact Assessment (Section 4)**

The land parcels contained within the Council's Landscape and Visual Assessment of greenfield sites does not match with the Greenfield Parcel Assessment in Part 2b of the Housing Study making comparative analysis extremely difficult and begs the question whether this could support a robust site selection process and consideration of reasonable alternatives.

Given the lack of clarity in the findings we provide our own composite table (Figure 4.1) and compare all the parcel assessments covering the four greenfield sites proposed for release in west Edinburgh. We also provide the assessment of South of Riccarton being promoted by Wallace.

This demonstrates that the landscape conclusions have not been consistently applied when it comes to site selection, with the proposed allocations at Kirkliston and Calderwood considered to have 'no scope for development' in landscape terms, whilst South of Riccarton is considered to have 'scope for development' and should therefore merit a proposed allocation.

#### **Critique Of The Environmental Report (Section 5)**

The Council's Environmental Report only considers those 5 Greenfield sites considered by the Council to be suitable for release within the Housing Study, and therefore fails to meet the SEA requirement to test reasonable alternatives.

The land parcels assessed in the Environmental Report do not match the Housing Study, which is cross referred to when making site assessments and neither parcels match the preferred site choices. This makes comparative analysis across the evidence base difficult, and provides a further indication that the site selection process is not robust.

The Environmental Report assesses sites inconsistently. As such, we have carried out our own Environmental Assessment of the chosen sites in west Edinburgh and compared this against South of Riccarton (**Appendix 3**). The conclusion of this assessment scores the sites as following:

- South of Riccarton= **29**
- Crosswinds= **28**
- East of Riccarton= **27**
- West Edinburgh= **18**
- Kirkliston= **15.75**
- Calderwood= **12**

Therefore, Wallace objects that South of Riccarton has not been chosen as a suitable site in west Edinburgh and strongly objects on environmental grounds to the site choices of West Edinburgh, Kirkliston and Calderwood as they are unsuitable.

### **Critique of the Housing Study (Section 6)**

The Council has not undertaken a call for sites leading to a lack of clarity on how housing sites have been identified. Site boundaries and categorisations do not correlate with other evidence base documents. This is unacceptable given the importance of this document in informing site selection.

The Housing Study omits important environmental criteria, including proximity to statutory environmental designations, and as such cannot be considered a robust assessment in line with SEA requirements. Furthermore, the criteria that are included do not properly assess site deliverability in terms of the existing capacity in local services, roads and public transport, or marketability.

As with the Environmental Report, some sites are assessed on the basis of their current position (without mitigation), whilst others are assessed on their future potential (with mitigation), which skews the results.

The two elements that seem to generate the most discrepancies in the scoring are education and public transport.

The Council's evidence base lacks an Education Impact Assessment, which should take into consideration existing capacity in the School Estate to inform an infrastructure first approach. Instead the Council favours the selection of sites such as Kirkliston to provide brand new school infrastructure. This may not be an issue in itself however, the evidence base is incomplete to determine if it is the most sustainable approach and the location for the new education facility seems to have been one of the key starting points and once that decision has been made it obviates an objective assessment of all other potential site options.

The Council's Assessment of South of Riccarton goes even further and states that it may have capacity to deliver a new school were it not for the East of Riccarton site taking up the capacity. Again, this demonstrates that each individual site has not been assessed objectively or independently, with a strong element of pre-determination when an Education Impact Assessment has not even been provided as part of the publicly available evidence base.

This is especially significant given that the Council's approach to calculating education need and contributions proposed within their 'Supplementary Guidance on Developer Contributions and Infrastructure Delivery' for the existing LDP was rejected by the Scottish Government on 29th January 2019.

In relation to public transport, site choices such as Kirkliston and Calderwood simply don't support the key Local Development Plan objective of reducing the reliance on the private car and Edinburgh

City Council's objective to be a carbon neutral City by 2030. Moreover, these sites do not sit within a sustainable transport corridor as identified by the ESSTS and should not be supported for development, whereas South of Riccarton does (Corridor 8) and should therefore be supported as a sustainable location for development.

Due to the inconsistencies and unjustified conclusions of the Housing Study we have carried out our own Housing/Sustainability Study of the chosen sites in west Edinburgh and compared this with South of Riccarton. This assessment is provided at **Appendix 6**. The conclusion of this assessment scores the sites as following:

- South of Riccarton= **17**
- East of Riccarton= **16**
- West Edinburgh= **15**
- Crosswinds= **11**
- Kirkliston= **- 1.5**
- Calderwood= **- 6**

Therefore, Wallace objects that South of Riccarton has not been chosen as a proposed greenfield site in west Edinburgh and objects to the site choices of Kirkliston and Calderwood as they are unsuitable and not sustainable.

In addition, Wallace objects to the site choices of West Edinburgh and Crosswinds as the national policy (NPF3) includes these sites within a 'Strategic Airport Enhancements' area, which is stated as being a business led, employment generating area, with no specific provision made for housing. Indeed, both Edinburgh Airport and British Airways strongly objected to the principle of residential development in this area in the previous Local Development Plan, whilst also raising noise and traffic concerns. The national policy direction would therefore need to be changed, and these concerns addressed before housing sites could even be considered as suitable and deliverable allocations within this area.

## **Conclusion**

This representation has undertaken a detailed review of the Edinburgh Choices for City Plan 2030 and its supporting evidence base and has identified a number of major flaws and inconsistencies in the site selection process, focusing on housing release in west Edinburgh. Due to this Pegasus has undertaken our own Environmental and housing study scoring exercises.

This exercise concludes that South of Riccarton is the highest scoring site when compared against the Council's preferred site choices for west Edinburgh. This is due to its landscape capacity for development, relatively few environmental constraints, direct access to existing public transport facilities (train, bus) that can be enhanced within the plan period, direct access to employment

---

opportunities at Heriot-Watt (economic growth hub) and the potential for education and service improvements (new Riccarton Village centre).

In light of these facts, we respectfully request that South of Riccarton is considered as a potential greenfield release site for west Edinburgh.

---

## **1. INTRODUCTION**

- 1.1 These representations have been prepared on behalf of Wallace Land Investments (“Wallace”) in relation to the Edinburgh Choices for City Plan 2030 and should be read in conjunction with the further representations submitted on South of Riccarton by Geddes Consulting on behalf of Wallace.
- 1.2 This report focuses on how greenfield sites in west Edinburgh have been considered and assessed in the supporting evidence, with specific reference to the Wallace site South of Riccarton. These representations focus on the Council’s evidence base documents supporting the Choices for City Plan.
- 1.3 For clarity, this report relates to the main Edinburgh Choices for City Plan 2030 consultation document issued by the City Council in January 2020 and the associated evidence base documents issued alongside it, including:
- City Plan 2030 Environmental Report (and Non-Technical Summary);
  - Choices for City Plan 2030 - Monitoring Statement;
  - Choices for City Plan 2030 – Housing Study, Jan 2020 (Part 1 and Part 2);
  - Choices for City Plan 2030 – Integrated Impact Assessment - Summary Report - Jan 2020;
  - Choices for City Plan 2030 – Financial Resources Appraisal;
  - Edinburgh Strategic Sustainable Transport Assessment, Jacobs, Oct 2019;
  - Draft City Mobility Plan, Jan 2020;
  - Edinburgh City Plan 2030 – Landscape and Visual Assessment of Greenfield Sites, April 2019; and
  - Development Plan Scheme, Jan 2020.
- 1.4 Wallace has grave concerns about the following aspects of the Choices for City Plan and the direction of travel that appears to have been taken by the City Council so far:
- The Environmental Report supporting the City Plan does not assess all reasonable alternatives and therefore fundamentally fails the requirements of EU SEA Directive and associated Scottish law associated with the assessment of environmental impacts;
  - The evidence supporting the Choices for City Plan has been misinterpreted or misrepresented within the Choices for City Plan document itself, leading to unjustified and inconsistent outcomes;
  - The site selection process that has resulted in the currently chosen greenfield sites is not transparent and entirely missing in the context of certain alternative locations; and

- The aspirations set out within the plan as currently drafted are not consistent with certain policies set within national planning policy.
- Selecting preferred sites at this early stage of the Edinburgh Plan is also considered somewhat premature given the evidence base is still emerging in respect of the Edinburgh Strategic Sustainable Transport Strategy Stage 2 and West Edinburgh Spatial Strategy.

1.5 We address the following aspects within this document:

- **Section 2** highlights how EU and Scottish environmental legislation needs to be addressed and why the Choices for City Plan 2030 document and its associated Environmental Assessment falls short of these requirements;
- **Section 3** provides a critique of the transport evidence (notably the City Mobility Plan and Strategic Transport Assessment) which identifies errors that have carried through to the site scoring within the Environmental Report and Housing Study;
- **Section 4** reviews the Council’s Landscape Assessment, which does not assess sites on a consistent basis compared to the Environmental Report and other related documents;
- **Section 5** provides a detailed critique of the Council’s Environmental Report, which identifies flaws and inconsistencies in the overall approach as well as the assessment of individual sites.
- **Section 6** addresses the Council’s Housing Study, which includes errors and inconsistencies (including those related to the transport evidence as noted in section 2).
- **Section 7** summarises our responses to various sections of the Choices for City Plan cross referring to previous issues raised and national planning policy requirements.

---

## 2. STRATEGIC ENVIRONMENTAL ASSESSMENT PROCESS & OBLIGATIONS

- 2.1 Strategic Environmental Assessments (SEA) and Sustainability Appraisal legislation is found in European Directive 2001/42/EC and was transposed into Scottish Law through the Environmental Assessment (Scotland) Act 2005<sup>1</sup>.
- 2.2 The Act requires that an environmental assessment is undertaken on all plans, programmes and strategies of a public nature which are likely to have significant environmental effects. Detailed guidance on these regulations are contained within Scottish Government's guidance note on Strategic Environmental Assessments<sup>2</sup>.
- 2.3 Part 4 of the Act confirms that the European Directives will apply plans and programmes which are subject to preparation or adoption (or both) by a responsible authority at national, regional or local level. Edinburgh City Council is a responsible authority and this plan is being prepared at the local level. Part 5(3) of the Act confirms such plans include those for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, **town and country planning or land use** and sets the framework for the future development consent of projects listed in Schedule 1 of the Act, which lists a range of industrial and infrastructure related development sectors.
- 2.4 The Choices for City Plan therefore qualifies as a plan that requires a Strategic Environmental Assessment. This is endorsed by paragraph 65 of Circular 6/2013 Development Plans, which confirms that a SEA (and HRA) is required for **all** Local Development Plans.
- 2.5 As confirmed at paragraph 1.2 of the SEA guidance:
- 'SEA is a means to judge the likely impact of a public plan on the environment and to seek ways to minimise that effect, if it is likely to be significant.'*
- SEA therefore aims to offer greater protection to the environment by ensuring public bodies and those organisations preparing plans of a 'public character' consider and address the likely significant environmental effects. Under the Environmental Assessment (Scotland) Act 2005, those bodies preparing qualifying Scottish plans are required to undertake a SEA of plans that are likely to have significant environmental effects, if implemented.*
- 2.6 Sections 3E of the Town and Country Planning (Scotland) 1997 Act also require that functions relating to the preparation of the National Planning Framework by Scottish Ministers and development plans by planning authorities must be exercised with the objective of contributing to sustainable development.

---

<sup>1</sup> <http://www.legislation.gov.uk/asp/2005/15/contents>

<sup>2</sup> <https://www.gov.scot/publications/strategic-environmental-assessment-guidance/>

2.7 Section 44 of the Climate change (Scotland) Act 2009 also sets out that public bodies (which includes planning authorities) must, in exercising their functions, act in the way best calculated to contributing to the delivery of the climate change targets set out in that Act.

2.8 Critically, Article 5(1) of the SEA Directive states:

*'Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and **reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated.** The information to be given for this purpose is referred to in Annex I (**our emphasis**).'*

2.9 The relevant Annex confirms the information to be provided under Article 5(1), subject to Article 5(2) and (3), is the following:

- a) *an **outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;***
- b) *the **relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;***
- c) *the **environmental characteristics of areas likely to be significantly affected;***
- d) *any **existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;***
- e) *the **environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;** (i.e. an assessment of national and strategic planning policies and other relevant objectives for the area).*
- f) *the **likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;***
- g) *the **measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;***
- h) *an **outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties***

*(such as technical deficiencies or lack of know-how) encountered in compiling the required information;*

- i) **a description of the measures envisaged concerning monitoring** in accordance with Article 10;
- j) *a non-technical summary of the information provided under the above headings.*
- k) **That these effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects (our emphasis).**

2.10 It is therefore clear that in preparing a Local Development Plan there is a need to consider an array of issues and options (including reasonable alternatives) and test how these might impact on the environment, climate change and the need to promote sustainable development as defined by national planning policy. Indeed, testing various options in a consistent and transparent manner allows a public body and a decision maker to come to the best possible judgement as to how an initial plan, a preferred option and final adopted development plan should be configured to minimise the impact of the plan on the environment and the various issues raised under Annex I of Article 5(1) of the SEA Directive. Providing a consistent, objective and transparent assessment also allows for a more robust, fair and open public consultation exercise to take place. We have serious concerns that the Council's decision making process in relation to the Main Issues and Options version of the plan (i.e. the Choices for City Plan) has been compromised by the approach adopted by the Council so far.

2.11 In this case, one of the critical considerations for the Choices for City Plan relates to the scale of new homes required to house existing and future population and how this can be achieved in the context of achieving 'sustainable development'.

2.12 The new homes will most likely result in an increase in the local population within Edinburgh and the preferred spatial distribution of this population will have an impact on key services (such as schools) and key infrastructure, including transport infrastructure. Considering these issues alongside the SEA requirements associated with the likely effects on the environment as listed under criteria f of Article 5(1) of the SEA Directive is therefore critical.

2.13 Indeed, paragraph 274 of the Scottish Planning Policy (SPP) specifically states the following:

*In preparing development plans, **planning authorities are expected to appraise the impact of the spatial strategy and its reasonable alternatives on the transport network**, in line with Transport Scotland's DPMTAG guidance. This should include consideration of previously allocated sites, transport opportunities and constraints, current capacity and committed improvements to the transport network. **Planning authorities should ensure that a transport appraisal is undertaken at a scale and level of detail proportionate to the nature of the issues and proposals being considered, including funding requirements. Appraisals should be carried out in time to inform the spatial***

---

***strategy and the strategic environmental assessment.*** *Where there are potential issues for the strategic transport network, the appraisal should be discussed with Transport Scotland at the earliest opportunity (**our emphasis**).*

- 2.14 In the context of the Choices for City Plan, therefore, an accurate assessment and portrayal of the existing transport infrastructure supporting the City is critical as is a clear understanding of all other environmental impacts.
- 2.15 We note the Council have produced a City Mobility Plan and this is informed by the Edinburgh Strategic Sustainable Transport Study (ESSTS) (Phase 1) carried out by Jacobs, which we will comment on in more detail below and within **Section 3**. However, it is pertinent to note that there are critical inaccuracies in the Jacobs document relating to an existing rail service to the existing settlement of Currie. Moreover, Map 3 within the Choices for City Plan Document, which depicts the proposed sustainable transport corridors from the Jacobs report, is also inaccurate in terms of its positioning of the Proposed Strategic Public Transport Corridor 8. Both of these errors would notably impact on any Environmental Assessment and considerably impact on judgements made towards Wallace’s site at South of Riccarton.
- 2.16 Figure 2 within the 06/2013 Development Plan Circular confirms that an Environmental Assessment should be consulted upon at the main issues stage. In light of this, the Council have prepared an Environmental Report and this forms part of the current consultation process. The opening paragraph of the report confirms the main purpose of the report which is to:
- ‘Provide information for Edinburgh’s City Plan 2030 at the Choices for City Plan 2030/Main Issues Report (MIR) stage;
  - Identify, describe and evaluate the likely significant environmental effects of the preferred approach to the choices in the MIR and any reasonable alternatives;
  - Consider the potential environmental effects of potential new development sites to inform the preferred approach and reasonable alternatives to be identified in the MIR.’
- 2.17 The report does provisionally seek to provide a considered assessment of the likely impacts on each of the items under criterion f of Annex I of the SEA Directive. However, the assessment only considers the sites that have been put forward within the Choices for City Plan, rather than a full range of potential sites so as to inform the sites that should form part of the City Plan. This is not in keeping with the spirit or indeed legal requirements of the SEA process which must assess all reasonable alternatives. Indeed, without a similar assessment of alternative potential greenfield sites, it is not possible to determine if the ones chosen are the most suitable when considering their impact on the environment and other policy objectives.
- 2.18 Paragraph 64 of Circular 6/2013 provides further advice in the context of producing a robust, timely and transparent Environmental Assessment and importantly confirms that developers and land

promoters should be given the opportunity to submit their sites to local planning authorities to ensure their sites can be tested through the SEA process at an early stage. It states:

*'Many authorities run a "Call for Sites" prior to preparing the Main Issues Report. This is not a requirement of the legislation, but it can be a useful part of the process. This stage allows landowners and prospective developers to put forward for consideration by the planning authority the sites for which they have an aspiration for development. **It is important in meeting the requirements for strategic environmental assessment that full information on sites and alternative options is submitted early and not held back until the later stages of plan preparation or even the Examination.** Promoters of sites would be advised to respond positively at this point, and to provide the necessary evidence to justify their site's inclusion as a preferred option at the Main Issues Report stage. **Engaging at this early stage is likely to ensure that the planning authority is able to properly assess the merits of the proposal, with it being more likely to be subject to public engagement and strategic environmental assessment at the Main Issues Report stage and to neighbour notification at the Proposed Plan stage (should the planning authority propose that the site be allocated in the plan) (our emphasis).'***

- 2.19 In this case, the Council have not undertaken a Call for Sites exercise. As noted by the Circular, this is not a legal requirement but given the plan relates to Edinburgh: Scotland's capital and most influential city, adhering to the government's guidance within the Circular would seem entirely prudent in this instance.
- 2.20 Notwithstanding this, we are aware that Wallace did provide details of their land South of Riccarton in June 2018 to the Council. These details demonstrated that the site was available, suitable and deliverable for a strategic residential led, mixed use development with capacity for over 3,000 homes, new schools, new public transport provision and a new local centre. This detail was provided in advance of the Environmental Assessment being prepared. Notwithstanding this, the site has not been assessed within the Environmental Assessment as a preferred site or even as a reasonable alternative.
- 2.21 Interestingly, the site is actually depicted on some of the plans at Appendix 6 of the Environmental Assessment including the Biodiversity, fauna and flora plan and the Active Travel Plan and in both instances it is defined as a 'Potential Greenfield' site along with the land East of Riccarton. This would seem to indicate that the Council and the authors of the Environmental Assessment were fully aware of the site. However, there is no proforma assessment of the South of Riccarton site and there is no direct explanation as to why it has been excluded from the Environmental Assessment, despite clearly being a reasonable alternative to many of the other potential housing greenfield sites assessed.
- 2.22 A partial explanation can be found on page 24 of the Environmental Assessment under the heading 'Greenfield Sites'. It is stated that a detailed assessment was undertaken of all greenfield sites around Edinburgh and detailed information on the assessment work undertaken can be found in

---

the supporting Housing Study, which is also issued for public comment as part of this consultation process.

- 2.23 There are obvious shortfalls associated with this approach. Critically, the assessment criteria in the Housing Assessment are not the same as those in the Environmental Assessment (See **Appendix 1** – which lists all the criteria across the 2 documents).
- 2.24 Whilst there is some overlap in relation to some of the topic areas, the differences in approach are evident by the range of questions asked and the topics covered. Perhaps the most startling omission is the lack of any questions associated with ecological designations and habitats within the Housing Study. As such, the Council cannot claim to have undertaken a compliant SEA assessment of reasonable alternatives, particularly when it comes to the selection of housing sites simply by cross referencing the Housing Assessment. Indeed, there is no consideration within the Housing Study relating to the proximity of sites towards European protected areas such as RAMSAR sites located on the coast. As such, there has been no genuine assessment of how certain proposed Greenfield Housing sites might impact on these areas either through the intensification of their use (and disturbance) by a new, larger localised population located next to these areas, or on supporting habitat for certain species associated with the RAMSAR site or any other ecological designation. This is a serious shortfall in the Council’s approach to site selection that must be addressed.
- 2.25 Secondly, the matter is compounded by the fact that the assessment in Housing Study adds preferential treatment and commentary towards the preferred sites within the Choices for City Plan document in relation to a number of topics. Clearly this circumvents any ability to carry out an objective assessment of reasonable alternatives when coming to undertake the Environmental Assessment. Indeed, the Council have confirmed within the Environmental Assessment<sup>3</sup> itself that the parameters of the Environmental Assessment in terms of testing reasonable alternatives (including alternative site options) is based on the outcomes of the Housing Study.
- 2.26 We provide a more detailed analysis of each of the currently identified sites in the Choice for City Plan and a detailed assessment of Wallace’s site in subsequent sections; however, in order to help demonstrate and articulate some of the issues raised by the Council’s site selection approach and how this impacts on the legal requirements of an SEA, we draw reference to the Housing Study assessment of the East of Riccarton Site (which is a preferred site in the Choices for City Plan document) (see pages 160 to 162) and Wallace’s South of Riccarton site (see pages 165-167). We do not pick out the East of Riccarton site to be directly critical of this site but simply to highlight the inconsistent approach applied in the Council assessment.
- 2.27 Notably both sites are of a similarly large scale and can deliver a significant number of homes and associated facilities. Both are also fully located within the Strategic Public Transport Corridor 8 and both border the Heriot-Watt University, which we have assumed must be regarded as an

---

<sup>3</sup> See ‘Greenfield Sites’ section on page 25 of the document.

Employment Cluster location given the University's scale and proximity of accompanying businesses in the area.

- 2.28 One example of an alternative approach being taken when it comes to assessing the two sites within the Housing Study is under the Active Travel question '*Does the site support travel by foot to identified convenience services?*'. The East of Riccarton site obtains an amber/partially rating with the following commentary and analysis:

*'The site is not within walking distance to local convenience services. Convenience services can be provided on the site due to scope for development here.'*

- 2.29 As such, the Council have raised the site's status from what would have been a red/no rating based on the existing situation (which is correct as there are no convenience stores within a reasonable walking distance) due to what the Council envisage could be delivered on the site through development. That is itself is not a problem and a perfectly reasonable approach to take. However, consistency must then be applied to similar sites, where it is known there is the ability to provide new services.

- 2.30 In comparison, the South of Riccarton site obtains a red/no rating with the following commentary and analysis:

*'The site is not within walking distance to local convenience services. It is unlikely that access can be improved, and convenience services are unlikely to be provided on the site due to lack of scope for development nearby.'*

- 2.31 There are two issues with this assessment. Firstly, the southern most parts of the site are actually within a reasonable walking distance to convenience services located within Currie. There is a local/neighbourhood centre located within 700m from the edge of the site located between the A70 and Pentland View. The centre contains a Co-op convenience store, pharmacy, library, various take-aways, a pub and other services. Between the edge of the site and the local centre, there is an existing footpath with street lighting all the way down Curriehill Road. There is a slight upward incline towards the end of the route but it is perfectly walkable. The benchmark walking distance / time used in the Housing Study assessment is confirmed to be 800m / approx. 10 minutes. An alternative parade of shops is also located Bryce Road and Corslet Place, which is also just within the 800m / 10 minute walking time distance from the edge of the site.

- 2.32 Whilst we note that the 800m distance would be exceeded if measured from a central location within the site, there are parts of the site that would clearly rank green on the above analysis. We suspect the same is true of the East of Riccarton site too but there will be other sites assessed within the Housing Study that do not come anywhere close to these measurements and distances. Indeed, our client's site is lumped in with all other far more remote sites when it comes to this criterion.

- 2.33 Notwithstanding this, the primary issue with the Council’s assessment of both sites is that they fail to recognise that the South of Riccarton site can and would also deliver new convenience services. This has been made very clear in the promotion material issued by Wallace to the Council. The scale of the development would generate more than sufficient retail expenditure to justify a new local centre. As such, there is no basis for the Council to conclude that the position is unlikely to be improved and that convenience services are unlikely to be provided on the site due to the lack of development nearby. To rank the site red rather than amber is therefore entirely inconsistent with the approach adopted on other sites (namely those the Council have currently chosen to put forward in the Choices for City Plan). The only reasonable conclusion would be to elevate the site’s status to Amber in this respect.
- 2.34 The same approach is taken in relation to questions associated with the ability to improve community infrastructure (i.e. school provision), which we address in more detail in Section 6 of our representations but is notable that the East of Riccarton site is given the rank of amber/potential when considering the ability to provide new schools whilst the South of Riccarton site is ranked red/no despite the fact that Wallace has confirmed the development is of a scale that would be capable of delivering new education provision.
- 2.35 Reference is also made under the South of Riccarton site assessment that new Secondary School provision would be required due to capacity issues at Currie High School and that a new secondary school would have to serve a wide catchment area so good active travel and transport links would be necessary. Notably, no reference is provided in relation to the site’s proximity to Curriehill train station within this section and what scope this existing infrastructure offers in order to address catchment areas for a new school. Indeed, no ‘deep dive’ analysis is provided in relation to the education programme for the area within the Housing Study and the analysis of the site is simply closed off by saying *‘There is not enough scope for development on this and nearby sites to support this level of intervention’*. We refute this position on the basis that insufficient evidence has been provided to come to this conclusion.
- 2.36 Perhaps the most onerous component of the Council’s assessment relates to how the sites score in the context of access to public transport provision. (remembering that paragraph 274 of the SPP confirms a robust assessment of public transport provision should be undertaken to inform site selection and the SEA process – see paragraph 3.13 above). Both sites generate red/no ratings within the Housing Study in relation to the following questions and are given the following analysis / commentary:
- ‘Does the site support travel by public transport through existing public transport network accessibility and capacity?’
- ‘No – the site does not support travel by public transport based on existing or incrementally improved provision.’*
- ‘Is the site potentially served by an identified public transport intervention project which is deliverable in the plan period to serve and accommodate development?’

---

*'No – the site may support travel by public transport based on an identified intervention, but this intervention is not deliverable within the plan period.'*

2.37 Again, no reference is made to the fact that the site is located directly adjacent to Curriehill train station, with the entirety of the site falling within which has a regular and frequent half hourly service to Edinburgh during AM and PM peak times and an hourly in-between. Had this been acknowledged within the Council's evidence, we cannot foresee how the Council could reach the above conclusions in relation to public transport access for the South of Riccarton site.

2.38 We address public transport issues and the Council dedicated evidence on this in more detail in Section 3. However, on page 6 in Appendix 2 of the Housing Study, the Council confirms how the sites are scored in the context of these two questions and states the following:

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

*Assessed based on Edinburgh Strategic Sustainable Transport Study (ESSTS) input which assesses corridor and site accessibility through TRACC public transport analysis taking into account passenger volume over capacity (V/C) on key routes and bus frequency along corridors.*

*The ESSTS has used a red/amber/green scoring system for the sites, so where the site scores green in this assessment this will be classed as yes [green]. Where the site scores amber in this assessment it will be classed as partially suitable [amber]. Where the site scores red in this assessment it will be classed as no [red].*

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

*The ESSTS has identified public transport interventions that could enhance the accessibility, capacity and quality of the overall public transport network. This stage of the study does not make specific route/modal recommendations, but has identified those corridors where major transport enhancements should be considered in more detail based on a range of criteria. These criteria were scored in the study and the corridors which scored sufficiently well against criteria are to be taken forward for further consideration.*

*The study uses a similar red/amber/green scoring system to score the future accessibility of sites taking into account future intervention. The overall assessment should be a composite taking into account the access and capacity assessment above and any required interventions.*

*If the site sits alongside an identified corridor improvement with a long-term score of green or has an existing score of green with no identified corridor improvement this will be classed as yes [green]. If the site sits alongside an identified corridor improvement with a long-term score of amber or has an existing score of amber with no identified corridor improvement this will be classed as partially suitable [amber]. If the site sits alongside an identified corridor*

---

*improvement with a long-term score of red, or if the site is not along an identified corridor or still has a long-term score of red this will be classed as no [red].*

- 2.39 As such, we seemingly need to turn to the ESSTS to determine why each site in the Housing Study obtains the score it does in relation to this issue. This document is prepared by Jacobs and dated October 2019. It helpfully provides reference to a number of public transport corridors and options associated with where new public transport infrastructure could be targeted. However, it certainly does not assess the individual sites assessed within the Council’s Housing Study. As such, we can only assume there is another assessment available to the Council that does review the accessibility score of each site in the Housing Study but this has not been made publicly available and is therefore not subject to any scrutiny or interrogation as part of this consultation exercise. Again, we raise the issues over transparency bearing in mind this all ultimately ties back to the approach adopted by the Council to assess reasonable alternatives for the purposes of the SEA.
- 2.40 To conclude, the Council’s Environment Assessment is fundamentally flawed by the fact that it does not assess a reasonable selection of alternative sites or alternative spatial distribution options for accommodating Edinburgh’s future housing needs. This is compounded by the fact that the Environmental Assessment only assesses sites that make it through the Council’s site selection process set out within the Housing Assessment, which adopts a very different set of questions and parameters to the Environmental Assessment and is not entirely objective when considering all issues (as highlighted above). In light of this, the approach adopted by the Council to date fails the requirements of EU Directives and Scottish environmental and planning law.
- 2.41 It is also pertinent that other evidence base documents are still under preparation, which could have a material bearing on site selection and the SEA process, including the West Edinburgh Spatial Strategy (commissioned by the Council, Scottish Government, Scottish Future’s Trust and Scottish Enterprise, and being undertaken by Rettie, Aecom and Collective Architecture) and Phase 2 of the ESSTS, and therefore it is arguable that selecting preferred sites at this early stage is somewhat premature. Wallace therefore, object to the proposed sites (Calderwood, Kirkliston, West Edinburgh, East of Riccarton & Crosswinds) in west Edinburgh at the present time.
- 2.42 As a final point, we note that the Council have not provided a formal Habitat Regulation Assessment at this stage either and whilst we note the Environment Assessment touches on the various ecological habitats within the area, this does not satisfy the requirement to prepare a dedicated HRA. This must be addressed and should inform the Council’s overall development plan strategy.
- 2.43 In summary, this section has highlighted a number of critical shortfalls in the Council’s evidence base when it comes to tying this into the Council’s obligations to test reasonable alternatives under Strategic Environmental Assessment Directives. The following sections look at the key evidence base documents in more detail.

---

### 3. CRITIQUE OF TRANSPORT EVIDENCE BASE

- 3.1 This section reviews the Council’s Strategic Sustainable Transport Assessment (ESSTS) prepared by Jacobs in October 2019. The report largely focuses on the suitability of a number of corridors and their suitability for improved public transport access and investment. Wallace’s site sits within Corridor 8 (West of Hermiston).
- 3.2 The first point to highlight with this assessment is that it is highly geared towards assessing suitable corridors for ‘transit-based solutions’ as confirmed at paragraph 1.10. Paragraph 1.12 goes on to confirm that the working definition of this term for this assessment relates to public transport solutions that would deliver a *‘step-change in provision above existing services, or that could be delivered from more incremental improvements such as service frequency enhancements.’*
- 3.3 The following paragraphs go on to reference tram and Bus Rapid Transit modes and the remainder of the Jacobs assessment focuses specifically on the ability to increase the local public transport network using these particular modes. Indeed, limited reference is given to existing rail infrastructure on the basis that this is being addressed at a national level through the Strategic Transport Projects Review 2 (STPR2) and therefore rail based interventions / solutions (and indeed capacity at existing stations) is not considered by Jacobs. However, it must go without saying that the existing rail network is clearly a key existing piece of public transport infrastructure that should be optimised and considered through a Local Development Plan process. This is not to say the Jacob’s work is not useful but it cannot be regarded as being complete and would indicate that the transport related evidence base supporting the Local Development Plan is not sufficiently thorough to determine what the most appropriate and optimal solutions might be in terms of delivering sustainable development and spatial development options for Edinburgh. Indeed, a part modal transport assessment is not endorsed by National Planning Policy and paragraph 274 of the SPP does not distinguish between the different modes of transport that a Transport Appraisal should consider.
- 3.4 With that in mind, a compelling part of Wallace’s case to support development at South of Riccarton is the proximity of the site to Curriehill Train Station. The site abuts the station and provides suitable land that could be utilised for extended car parks/park and ride facilities and other public transport infrastructure to create a public transport hub/interchange.
- 3.5 On page 34 of the Jacobs assessment, which incorporates the baseline review for Corridor 8, it is noted that the rail service from Curriehill station is hourly. However, this is incorrect, in fact the station provides a half hourly or better service during the peak hours (07:00-08:30 and 17:30-18:30) which has not been factored into any of the assessments carried out by the Council as far as we can see. The rail service from Curriehill station now includes the following:

***Departing Curriehill to Edinburgh***

- 6:59 am

- 7:27 am
- 7:54 am
- 8:11 am
- 8:31 am
- Then hourly service until 20:29 pm

***Returning from Edinburgh to Curriehill***

- 17.26 pm
- 17.50 pm
- 18.26 pm
- 18:56 pm
- 19:26 pm

3.6 This must be reflected and rectified in the transport evidence, Housing Study and Environmental Assessment.

3.7 In particular, this level of service needs to be reflected on Figure 4.5 of the Jacobs assessment, which provides a heat map ranking to areas along public transport corridors and may well have influenced the assessment within the Housing Study regarding access to public transport, and has certainly influenced the Environmental Report as this same heat map is included within Appendix 6 of this document. Indeed, we note that the site and area is shaded green (ranked 1/low) on Figure 4.5 but we cannot conceivably see how that this would be the case with the above service and frequency accounted for.

3.8 It takes only 30 minutes to get to the centre of Edinburgh on most services and the 07:56 morning service only takes a speedy 16 minutes due to missing out certain stops between. This represents a frequent service for commuters to Edinburgh and allows the site to be classed as being well connected by public transport as it stands and notwithstanding the scope for further improvement of this service and additional integration with other public transport modes through the delivery of new development and associated infrastructure as suggested by Jacobs for Corridor 8.

3.9 Notably, in the baseline assessment for Corridor 8 (West of Hermiston), the following other observations are made by Jacobs:

- **Route:** *Broad corridor west of Hermiston, encompassing Heriot-Watt University and Curriehill station and future potential development areas.*
- **Transport Context:** *Bus services serve Heriot-Watt and Hermiston P&R.*

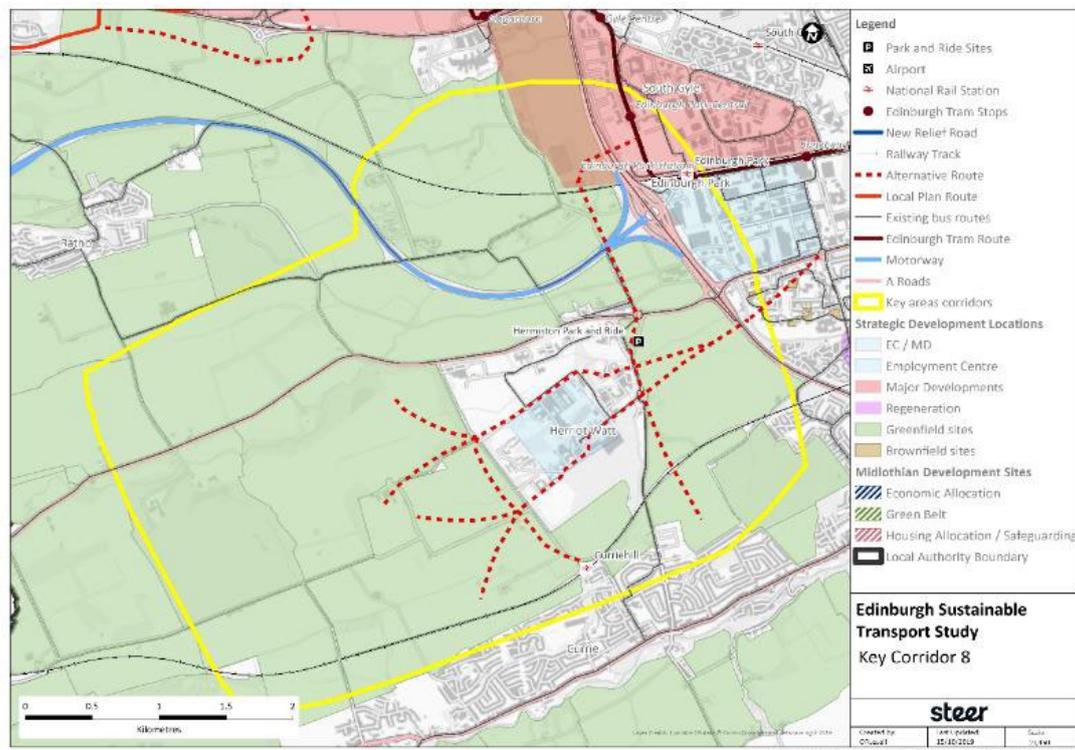
- **Transport Context:** Rail services from Curriehill (hourly at present) – see above comments.
- **Development Context:** Significant potential for greenfield development land (being considered through the City Plan process), which transit could help to bring forward in a sustainable manner.

3.10 Under the heading ‘**Opportunities**’ the following is stated:

- Significant greenfield land offers potential for transit-led development and urban-extension;
- Opportunities to connect to Heriot-Watt, Hermiston Park and Ride and Curriehill Station;
- Opportunity to link with existing tram route (around Edinburgh Park or Bankhead) or for bus-based transit options.

3.11 Curriehill station is therefore a key component of Corridor 8 and this is corroborated by Figure 9.1 on page 80 of the Jacobs assessment (copied below). The yellow boundary illustrates the correct boundary of the corridor.

*Figure 3.1 – Plan from Jacobs Assessment showing Key Corridor 8:*



3.12 Notwithstanding this, we note that the corridor area has seemingly shrunk and been misrepresented on Figures within the Jacobs report as the following figures do not include Curriehill station within the boundary of Corridor 8:

- Figure 4.1 – Strategic Corridors
- Figure 4.2 – Population Density
- Figure 4.3 – Employment Distribution
- Figure 4.4 – Scottish Index of Multiple Deprivation
- Figure 4.6 – Accessibility (Journey Time) to the City Centre
- Figure 4.7 – Accessibility Journey Times
- Figure 4.8 – AM Base Model Public Transport Demand
- Figure 4.9 – AM Base Model number of buses per hour
- Figure 4.10 – AM Base Model Bus Volume Capacity Ratio

3.13 Given the supporting text in the Jacobs report and the more detailed plan at Figure 9.1, we can only assume the above figures have been drawn up incorrectly. However, it is an important error as it results in the omission of Curriehill station from these figures and suggests Corridor 8 is not as centrally aligned with the University or proximate to the settlement with Currie and its associated services. Moreover, these figures suggest the land interests of our client are not within the Corridor when it clearly is by reference to Figure 9.1.

3.14 These errors must be corrected. Failure to do so misrepresents our clients site and we cannot be certain that the authors of other supporting evidence base documents, including the Housing Study, and authors of the Choices for City Plan would not have been influenced by these incorrect Figures and information when drafting these documents and specific site appraisals. Indeed, the fact that the Housing Study assessment of our client’s site suggests that public transport improvements would not be feasible to support development on the site is entirely at odds with the actual conclusions of the Jacobs assessment and Figure 9.1 which clearly show new links being provided to our client’s site.

3.15 Critically, Map 3 on page 17 of the Choice for City Plan 2030 continues this misrepresentation and shows Corridor 8 as excluding half of the University and Curriehill station. Irrespective of whether this is a simple drafting error, it is clearly misleading the public, landowners and other interested bodies in relation to the Plan and the accompanying evidence base. This raises serious questions over the validity of this initial consultation process.

3.16 Furthermore, the Choices for City Plan 2030 has failed to adequately justify why only two of the defined transport corridors, 3 – ‘South East Edinburgh via BioQuarter’ and 7- ‘Towards Newbridge and IBG’ have been chosen for further assessment for the delivery of new transit solutions; when the ESSTS concludes that four corridors should be assessed further, including Corridor 8 which covers the South of Riccarton site (which we address in more detail below).

- 3.17 Notwithstanding the above comments, we do support a number of the findings within the Jacobs assessment. We accept the principal benefits of strategic land use planning being aligned with strategic transport infrastructure investment. We also support and recognise the ability of transit in the form of trams and Rapid Bus Transit corridors to stimulate investment, improve health and wellbeing, safeguard our environment, and help deliver new sustainable communities. We simply reiterate our point that existing rail infrastructure also offers this opportunity.
- 3.18 With regard the 'sifting stage' at Section 5 of the Jacobs report, a summary of Jacob's sifting exercise is provided in Table 5.2 (copied below as our Figure 3.2). However, there is no associated commentary or specific assessment to determine how the scores are arrived at. As such, we have to assume this is simply based on a judgement of the author. That said, based on how the majority of the report is drafted, it is clear that Jacobs' assessment is heavily weighted towards tram infrastructure despite the fact that bus and rail provision should also impact on any scores, particularly in the context of Corridor 8.

*Figure 3.2 – Conclusion Table from Jacobs Assessment*

Table 5-2: Transit Assessment - Summary Findings

Corridor	Base demand	Development Demand (existing LDP)	Accessibility to support new areas for development in sustainable manner	Baseline inequality (Scottish IoMD)	Route alignment feasibility	Attractiveness to passengers (proxy for Value for Money)	Score (unweighted)	Suitability for tram / transit (Y / N)
New Town to Granton via Newhaven (1)	2	3	0	2	2	1	10	Y
Portobello / M'burgh (2)	2	2	0	2	1	1	8	N
South East via Bio-Q (3)	3	3	3	3	2	2	16	Y
Straiton (4)	2	1	2	2	1	1	9	N
South Suburban (5)	2	1	0	2	1	1	7	N
Granton (6)	2	3	1	3	2	2	13	Y
Newbridge (7)	1	2	3	1	3	2	12	Y
West of Hermiston (8)	1	1	3	1	3	2	11	Y
Queensferry (9)	2	1	2	1	1	1	8	N
W Edin North – South (10)	1	1	2	2	1	1	8	N

- 3.19 As noted, Corridor 8, Corridor 7 (towards Newbridge), Corridor 6 (Granton) and Corridor 3 (South East via Bio Quarter) have been shortlisted for further investigations for tram connectivity.
- 3.20 Of the corridors deemed suitable for tram transit, Corridor 8 scores 11 and this sits just 1 point behind Corridor 7 with the only difference relating to 'Development Demand' within the existing Local Development Plan. However, we note that it is stated that tram transit to Corridor 8 cannot be achieved if the investment is afforded to Corridor 7. It seems to be one or the other (see paragraph 9.7 of Jacobs assessment). Jacob's preference is afforded to Corridor 8.
- 3.21 Jacobs conclude at paragraph 8.15 that a bus-based or BRT transit option is the more appropriate solution for Corridor 7 and because of this, Jacobs suggest Corridor 8 should benefit from potential tram connections. Firstly we would note that the adopted LDP already safeguards extensions to the

existing tram network including connections to Newbridge<sup>4</sup>, whilst the City Mobility Plan specifically identifies an extended tram route to Newbridge as part of its vision to 2030, suggesting that Corridor 7 would be suitable and is being actively promoted for tram connections.

- 3.22 Whilst there is a strong case for Corridor 8 to benefit from tram transit as well due to the ability to connect to the university and surrounding employment clusters, which generate significant trips, it is also important to recognise that the South of Riccarton site is already well served by bus and train services.
- 3.23 As noted above, South of Riccarton already benefits from a 30min train service between Curriehill and Edinburgh in the peak hours. Furthermore, 11 bus routes currently serve the Riccarton Area (25, 34, 35, 45, 63, 23, X23, 27, X27/X28, 40/X40 and 44). Wallace's proposal includes the provision of a public transport hub adjacent to the existing Curriehill train station that could be utilised by buses during the early phases of development. This would provide connections to the university, employment cluster and better serve existing communities of Currie/Juniper Green by extending some bus routes to Curriehill. The additional demand created by the new and existing communities using the new bus services from Curriehill could support Bus Rapid Transit for quick and convenient access to the city centre.
- 3.24 If the City Council chooses to direct tram investment towards Corridor 8, bus connections could be provided to any future tram stop from this hub or trams could potentially access the hub in the future. This would make the South of Riccarton site one of the most accessible locations within the city region, which Wallace would clearly support.
- 3.25 Indeed, we understand that the ESSTS Phase 2 study is to be commissioned which will include further work on corridor 8 on the basis that Bus Rapid Transit can be a sustainable transport intervention for this corridor within the timescale of the LDP, which Wallace supports.
- 3.26 Within Section 9 of the ESSTS, which focuses on Corridor 8, we support many of the comments made and the suitability of greenfield land within the area offers an opportunity for an array of options, as depicted on Figure 9.1 (copied above) to connect sites. We also support the view that there is an '*excellent opportunity for strategic active travel infrastructure to be developed*'. Indeed, new green links through new development sites connecting to the university, the train station, the existing park and ride facility and towards the national cycle route networks 754 and 75, plus potential future tram stops, would all be entirely plausible.
- 3.27 We accept that providing a green link over the by-pass might be more challenging but the benefit of having good existing train and bus connections means that those undertaking a trip could utilise various modes on one trip to overcome such barriers.

---

<sup>4</sup> Table 9, Reference T1 at Page 37 of the Edinburgh LDP - November 2016

- 
- 3.28 Encouragingly, the assessment goes on to confirm that engineering options are likely to be feasible and there is no 'showstopper risk', which we concur with.
- 3.29 On the basis of South of Riccarton already being highly accessible by a range of sustainable modes (active travel/bus/train) it is in its present state more accessible than East of Riccarton, which has been chosen as a preferred greenfield site by the Council. Furthermore, South of Riccarton will create a transport hub at Curriehill to form a transport interchange supporting Bus Rapid Transit, deliverable within the Plan period. South of Riccarton is therefore the most sustainable site in west Edinburgh to locate greenfield development without major transport intervention and as such is not reliant on new tram infrastructure.

---

#### **4. CRITIQUE OF THE LANDSCAPE AND VISUAL IMPACT ASSESSMENT**

- 4.1 The Council's Landscape and Visual Assessment of greenfield sites was undertaken by Carol Anderson and Nigel Buchan with the final report issued in April 2019.
- 4.2 This divided the city into 6 geographical sectors defined by the Council, and a total of 139 greenfield parcels defined as Council Assessment Areas (CAAs) based on a range of factors including land ownership, landscape character and developer interest.
- 4.3 At the outset we would note that this categorisation is not consistent with other parts of the plan, both in terms of the overall sectors and the individual parcels (and their numbering) with no overall plan provided showing the different sectors; instead individual parcels are mapped by sector through the document.
- 4.4 By comparison, the Greenfield Parcel Assessment in Part 2b of the Housing Study splits the City into 7 sectors and 134 sites with some similarity in the sector and parcel boundaries but with different numbering (see **section 6**). The numbering is also different in the Environmental Report (see **section 5**).
- 4.5 These factors make a comparative analysis of greenfield land across the different evidence base documents extremely difficult and begs the question whether they could support a robust site selection process and consideration of reasonable alternatives (as discussed in section 2).
- 4.6 Furthermore, the individual parcel boundaries are not explained any further and whilst we acknowledge that wider landscape character areas don't always fit neatly with development sites, it is notable that the boundaries of two of the proposed Greenfield allocations, Kirkliston and Calderwood, have little correlation with the parcel boundaries used in the Landscape Assessment- with Kirkliston including small parts of parcels 20, 26 and 29 (in sector 5); and Calderwood containing a very small part of parcel 27 (in sector 4). This makes it difficult to draw firm landscape conclusions on two of the four greenfield sites that have been selected for release in west Edinburgh.
- 4.7 In terms of the methodology and approach to the study set out in section 3, it seems to conflate the assessment and importance of the wider Landscape Character Areas (LCAs) with the individual CAAs. It is our view that the overall features of the LCA are important contextually but shouldn't inform the detailed assessment conclusions here, given they are large scale/high level designations. Instead it should be focussed on the individual CAAs as these will inevitably have huge local variations in terms of their impacts, with such impacts even varying within these parcels.
- 4.8 In the assessment itself, the findings are listed in order of the different LCA, with individual parcel assessments amalgamated within each LCA section, again making it difficult to draw accurate landscape conclusions on individual sites, including 2 of the 4 greenfield sites proposed for release

in west Edinburgh. These include East of Riccarton which is covered under three different LCAS (29,30 & 31) and Calderwood which is covered by two (24 and 25).

4.9 Given the lack of clarity in the findings as presented we provide our own composite table below (Figure 4.1) and compare all the parcel assessments covering the four greenfield sites proposed for release in West Edinburgh. We also provide the assessment of South of Riccarton site being promoted by Wallace as an example of a site that is not proposed for release.

*Figure 4.1 – Conclusions of Landscape Assessment of West Edinburgh Sites*

Site	Sector	Council Assessment Area	Landscape Character Area	Key Designations	Assessment and Conclusions on Scope for Development	Overall conc
East of Riccarton	4	24 (East of Riccarton- all)	LCA 29 Gogar farmland and institutions – all		No commentary.	Scope for development but significant impacts
			LCA 30 East Hermiston farmland – all	Flood Risk Gogar Burn (24)	Notes CAAs are considered under LCA 29, but no specific commentary.	
			LCA 31 Baberton farmland - almost all.	Ancient Woodland (24)	CAA 24- Overall, it is considered that although some significant visual impacts and breaching of the existing settlement boundary provided by the bypass could arise there is scope to accommodate development in this CAA. This is due to its less strongly rural character and because opportunities exist to create new robust settlement boundaries to the west and south. Careful design would be necessary to achieve a cohesive development and enhance its landscape setting. This should include undergrounding high voltage transmission lines between the existing sub-station at Corslet and the two terminal towers close to the city by-pass. Generous landscape buffers should also be provided around the Murray Burn and Union Canal with associated enhancement and the creation of safe pedestrian and cycle routes across the M8 and A71.	
Kirkliston	5	19 (North Kirkliston- all), 20 (Craigbrae-part), 26 (Carlowrie Castle- part), 29 (Conifox-most)	LCA 10 Almond farmland – almost all.	Flood Risk (26), (29) / Designed Landscapes (26)	CAAs 19 and 20- There is no scope for development in this CAA. CAA 26- There is no scope for development in this CAA. CAA 29 - There is some scope to accommodate housing in this area, provided that the setting to Foxhall House, its parkland and walled garden is protected. There may also be opportunities to create an attractive riverside park and recreational routes in this area to enhance the landscape setting of Kirkliston.	No scope for development on majority of site
West Edinburgh	4	19 (Norton Park- all)	LCA 9 West Craigs Farmland – part	Flood risk over a small part of this CAA	CAA 19 - It is concluded that there is some scope for development in this CAA on the field lying to the west of Norton House Hotel and closer to Ratho Station.	Scope for development
Calderwood	4	26 (Overshiel-all) & 27 (Bonnington-small part)	LCA 24 Upper Almond Valley – part.	Special Landscape Area (26) / Ancient Woodland (26)	CAA 26 (only minor part) - There is no scope for development.	No scope for development on majority of site
			LCA 25 Bonnington farmland – most.	Ancient woodland (27) / Designed Landscape 133 (27)	CAA 27- excluded from the field assessment, due to the presence of constraints, including inclusion in the SLA, a designed landscape and its setting. CAA 26 - there is no scope to accommodate development in this CAA.	
South of Riccarton	4	45 (South of Riccarton- all) & 46 (Currievale-all)	LCA 27 Gowan Hill farmland - almost all.	Flood Risk Murray Burn (45) / Dalmahoy Inventory site - E part (45) / Core path 16, 17 (45)	CA45 & 46- There is scope for development to be accommodated on valley sides with opportunities to create a substantial Green Network and SUDs feature along the Murray Burn as a focus for any development. Off-road cycle and walking routes to Currie and Currie Station would need to be created and consideration should be given to undergrounding transmission lines with the visually discrete Long Dalmahoy area being a preferable site for terminal towers.	Scope for development but significant impacts

- 
- 4.10 A full version of this table is provided at **Appendix 2** including full descriptions of the LCA's and assessment conclusions.
- 4.11 This demonstrates that the conclusions have not been consistently applied when it comes to site selection, with the proposed allocations at Kirkliston and Calderwood considered to have 'no scope for development', whilst the land South of Riccarton is considered to have 'scope for development'.
- 4.12 There is no explanation for this in the main plan document, in terms of why landscape conclusions have been followed in some cases but not in others.
- 4.13 Moreover, based on the findings of the Landscape evidence, the land South of Riccarton should have clearly been considered for release.
- 4.14 Some reference can be found within the City Plan document and Housing Study as to why certain sites, such as the Kirkliston site options, have been included within the City Plan notwithstanding the clear recommendations of the Landscape Assessment. For instance, on page 15 of the City Plan, the following is stated:
- 'The Council is currently considering whether Kirkliston should have its own secondary school or whether alternative secondary school provision will have to be provided elsewhere. There is no site identified for a new secondary school and there is currently no funding in place.'*
- 4.15 On page 2 of the Executive Summary within the Housing Study, it is also noted that land East of Kirkliston is:
- 'Supported to deliver current Council priorities for the delivery of a new education infrastructure.'*
- 4.16 Further reference is also provided on page 313 which states:
- 'Any development should have regard to improving Queensferry Road for active travel and public transport, the need for a new secondary school in Kirkliston and the need for connection beyond the railway line to the existing urban area.'*
- 4.17 It may well be the case that the Council have decided that the educational needs of the area around Kirkliston outweigh the landscape harm clearly indicated in the Landscape Assessment. However, if this is the case, that decision needs to be formally documented and recorded somewhere within the evidence base and justified. However, there is no Education Impact Assessment supporting the City Plan or an existing educational needs survey provided. It is also prudent to point out that the Scottish Government recently declined the City Council's request to adopt statutory supplementary planning guidance on developer contributions, which included a large section on education contributions. As such, even if education needs were being used to override the conclusions of the Landscape Assessment, it is our strong view that insufficient justification has been provided to warrant such action at this stage.
-

---

## 5. CRITIQUE OF THE ENVIRONMENTAL REPORT

- 5.1 The City Plan 2030 Environmental Report was prepared by the Council’s Planning Policy Department to inform Choices for City Plan 2030, and states that it has been prepared in line with Section 15 of the Environmental Assessment (Scotland Act 2005).
- 5.2 This assesses sites against 28 individual criteria across 8 environmental topic areas listed below and as set out in more detail at **Appendix 1**.
- Biodiversity, Fauna and Flora;
  - Population and Human Health;
  - Soil;
  - Water;
  - Air and Climatic Factors;
  - Material Assets;
  - Cultural Heritage; and
  - Landscape and Townscape.

### **Issues with Methodology**

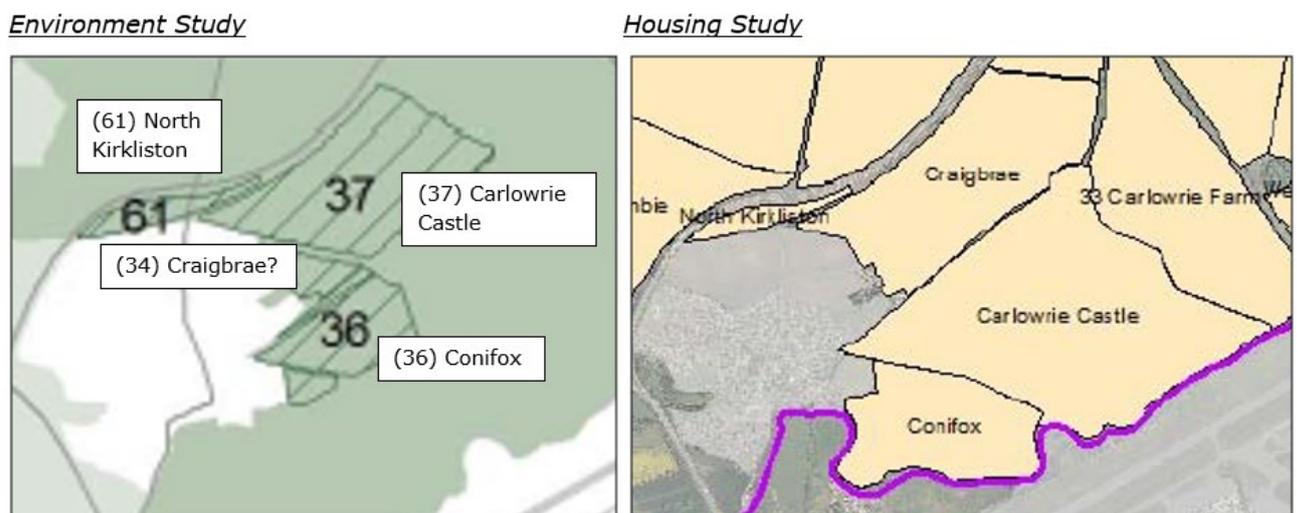
- 5.3 We do not dispute the criteria that are included, as they are all valid environmental considerations, although we would reiterate our comments from section 2 that this neglects other elements of sustainable development as defined by national planning policy (including accessibility & access to employment and education).
- 5.4 These other elements are considered separately in the Housing Study, which itself neglects important environmental considerations (such as ecological designations), an error compounded by the fact that the Environmental Report only considers those 5 Greenfield sites considered suitable for release within the Housing Study, and therefore fails to meet the SEA requirement to test reasonable alternatives.
- 5.5 This situation is further complicated by discrepancies between how sites are divided up/ labelled between the Environmental Report and Housing Study (and the Landscape Assessment as noted in section 4), which are said to both be based on land ownership boundaries, field boundaries or landscape features.
- 5.6 The Environmental Report assesses 13 greenfield parcels across 2 areas, including:
- 5 parcels that make up the South East Edinburgh allocation (No’s: 127, 11, 12, 16, 17) – see map on page 181; and

- 8 parcels that make up the 4 west Edinburgh allocations (No's: 4, 34, 36, 37, 42, 61, 82, 99) – see map on page 186.

5.7 However, the Greenfield Parcel Assessment in Part 2b of the Housing Study splits the City into 7 sectors and 134 sites with notable differences in the parcel boundaries and labelling, which don't match the proposed allocations/ sites actually being promoted.

5.8 This is most obvious in the case of Kirkliston as shown in Figure 5.1 below, where both the studies separate the site into 4 parcels. The parcels in the Environment Study accurately reflect the proposed allocation (albeit parcel 34 Craigbrae isn't actually labelled). However in the Housing Study, which is confirmed to be the critical document in the selection of this site, three of the four parcels (Conifox, Craigbrae and Carlowrie Castle) are larger than those proposed for allocation, whilst Craigbrae and Carlowrie Castle are labelled the opposite way round, adding to the confusion.

*Figure 5.1 – Discrepancies between sites in Environment and Housing Assessments*



5.9 This again makes comparative analysis across the evidence base difficult, and provides a further indication that the site selection process has not been robust (as discussed in section 2).

5.10 In addition to the issues above, we also disagree with a large number of the conclusions the Environmental Report reaches in relation to a number of the sites due to the inconsistent manner in which they have been assessed.

### **Comparative Environmental Assessment**

5.11 As such, we have carried out our own Environmental Assessment of the chosen sites in west Edinburgh (including the 4 greenfield sites and the brownfield site at Crosswinds). This assessment is provided at **Appendix 3**, and is summarised then compared with the Council's own assessment in the table below (Figure 5.3).

- 5.12 Within our own assessment, we also include the South of Riccarton site being promoted by Wallace as an example of a site that is not proposed for release (as we did in section 4).
- 5.13 The Council’s assessment does not provide a total score for each site, making direct comparison and overall ranking difficult. As such we have applied our own numerical scoring system as per below, which we then apply to the Council’s assessment and our own.

*Figure 5.2 – Pegasus Environmental Report Scoring*

Key of Council’s Assessment		Pegasus scoring:
A significant positive environmental effect	✓	2
A significant negative environmental effect	x	-1
Uncertain as to whether any significant positive or negative effects would be likely	?	0
Neutral or no significant effects likely	-	1

- 5.14 Where there are multiple parcels within the general allocation (i.e. Kirkliston and Calderwood), we provide a composite/average score for the parcels.
- 5.15 The criteria in the study generally consider the current position of sites in terms of their impacts and opportunities (i.e. without mitigation) although some also consider the potential opportunities for sites when developed, including P3 and L4 (relating to improvements to active travel, recreation and the green network respectively). However, the Council’s assessment doesn’t consider potential mitigation consistently, and overlooks opportunities on some of the sites listed above, which given their large scale would surely present opportunities to provide active travel infrastructure and open space in line with these criteria.

Figure 5.3 – Environmental Assessment Summary table (Council and Pegasus Site Assessments)

Site Name	Env. Code	Biodiversity					Population				Soil				Water				Air & Climate				Material Assets				Heritage				Landscape				Site Score	Collated Council	Collated Pegasus				
		B1	B2	B3	B4	B5	P1	P2	P3	P4	S1	S2	S3	S4	W1	W2	W3	W4	A1	A2	A3	A4	M1	M2	M3	M4	H1	H2	H3	H4	H5	H6	L1	L2				L3	L4		
South Riccarton	Council Pegasus	1	1	1	1	1	1	1	2	1	-1	-1	-1	-1	0	1	1	1	2	2	1	1	1	2	1	1	1	1	1	1	1	1	1	2	1	1	N/A	N/A	29	N/A	29
East of Riccarton	Council Pegasus	-	X	?	?	-	-	-	X	?	X	?	?	?	?	?	?	?	-	-	?	X	-	Y	?	?	X	X	?	-	-	X	-	-	?	-	?	?	7	7	7
Carlowrie Castle (Kirkliston)	Council Pegasus	-	X	?	?	-	-	-	X	?	X	?	?	?	?	?	?	?	X	X	?	X	-	-	?	?	X	X	?	-	-	X	-	X	-	-	-	-	4	4	4
Craigbrae (Kirkliston)	Council Pegasus	-	-	?	?	-	X	-	-	-	X	-	-	-	-	-	-	-	X	X	?	X	-	-	?	?	X	X	?	-	-	X	-	X	-	-	-	-	10	10	10
Conifox (Kirkliston)	Council Pegasus	-	-	?	?	-	-	-	-	?	X	?	?	?	?	?	?	?	X	X	?	X	-	-	?	?	X	X	?	-	-	X	-	-	-	-	-	-	13	13	13
North Kirkliston (Kirkliston)	Council Pegasus	-	-	-	-	-	-	-	?	-	X	X	X	X	-	-	-	-	X	X	?	X	-	-	?	?	X	X	?	-	-	X	-	-	-	-	-	-	12	12	12
Norton Park (West Edinburgh)	Council Pegasus	-	-	?	?	?	-	-	X	-	X	?	?	?	?	?	?	?	-	-	?	X	-	-	?	?	X	X	?	-	-	X	-	-	?	-	-	-	11	11	11
Overshiel (Calderwood)	Council Pegasus	-	?	?	?	-	-	-	-	-	X	?	?	?	-	-	-	-	X	X	?	X	-	-	?	?	X	X	?	-	-	X	-	-	X	-	-	-	9	9	9
Bonnington (Calderwood)	Council Pegasus	-	-	?	?	?	X	-	X	-	X	?	?	?	?	?	?	?	X	X	?	X	-	-	?	?	X	X	?	-	-	X	-	-	X	-	-	-	2	2	2
Crosswinds	Council Pegasus	-	?	-	-	-	-	-	-	?	Y	?	?	?	?	?	?	?	X	X	?	X	-	-	?	?	X	X	?	-	-	X	-	-	X	-	-	-	18	18	18
		1	1	1	1	1	-1	1	2	1	2	0	1	1	0	1	1	1	2	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	28	28	28
																										9.75	9.75	15.75													

Council's Assessment	Pegasus scoring
Significant positive effect (Y)	Positive (2)
Significant negative effect (X)	Negative (-1)
Uncertain (?)	Unknown (0)
Neutral / No significant effect (-)	Neutral (1)

5.16 We summarise the key findings and differences below for each of the sites:

***South of Riccarton***

- 5.17 As mentioned, the site has been considered both on its current position and development potential, based on the masterplan and promotional material submitted to date. On this basis the site scores positively in creating opportunities for active travel and accessibility to public transport given the proximity to Curriehill train station and proposed transport hub (including a bus terminus and car park). It also offers opportunities for social interaction with direct connections to the adjacent university and the proposed Local Centre.
- 5.18 The site can also create defensible green belt boundaries with the Murray Burn / the settlement of Currie to the south and Heriot-Watt University to the east. To the north and west of the site there is existing woodland and roads that the site edge follows, which also act as strong defensible green belt boundaries. These create a logical extension to the existing settlement and an obvious allocation site. For the remainder of the questions the site was considered to be neutral due to the lack of environmental designations within the site and the opportunities for mitigation in respect of heritage, landscape, ecology and amenity issues.
- 5.19 This gives it an overall score of **29** (which we cannot compare with the Council as they did not assess this site, or any others that could be considered reasonable alternatives). This suggests that the site should be considered for allocation.

***East of Riccarton***

- 5.20 Our assessment scored this site far higher than the Council did (**27** compared to **7**). The Council only gave this site one positive score and this was based on the site being able to provide open space and recreation. However, our assessment also scored it positively on active travel as it is directly adjacent to the 754 National Cycle Route, and on public transport accessibility, given its proximity to Hermiston park and ride facility in particular and Wester Hailes train station.
- 5.21 In terms of Green Belt boundaries the site was scored neutrally by the Council. However, there are strong existing boundaries provided by the bypass to the north, and the existing built up area to the east and south. The Council scored the site as neutral for the effects on the designated landscape area, but our assessment scored this as negative as it lies adjacent to the Gogar Special Landscape Area. For the remainder of the questions the site scored neutrally or unknown.
- 5.22 As such, we conclude that this site scores similarly but slightly lower than South of Riccarton and should be considered for allocation as proposed.

***Kirkliston***

- 5.23 The site at Kirkliston is split into four parcels: Craigbrae (34), Conifox (36), Carlowrie Castle (37) and North Kirkliston (61). Both the Council and our analysis score North Kirkliston higher than the other parcels, mainly due to it being well contained by the M90 road and existing built up area,

whilst the others are more open. Again, our scoring is slightly higher as we have assessed the sites positively on their future potential (with a composite score of **15.75** compared to **9.75**). However, it remains one of the lowest ranking locations when we assess it against the various environmental criteria.

- 5.24 The sites overall do not score positively. Indeed, they have only gained a positive score based upon their ability to provide open space and the defensible Green Belt boundaries of the northern section as noted. Some of the parcels contain Local Biodiversity Sites within them and have therefore been scored negatively on this basis. A major issue is proximity to active travel, this is reflected in all the parcels scoring negatively for Question P3 regarding opportunities for active travel. The site is very isolated and cannot be connected to the wider area through cycle routes. This is the same for public transport where all of the parcels score negatively due to the site having a lack of public transport other than a bus that does not run frequently. The site relies on car use due to the lack of sufficient public transport, lack of amenities and no connection to the cycle route.
- 5.25 Our assessment scored fewer negatives than the Council, for example the Council score sites negatively for not being brownfield land however we have rated the site as neutral, given the Council accept that there is unlikely to be sufficient brownfield capacity to meet all their housing needs. The Council also rate the site as negative for flood risk and state that Carlowrie Castle is located in a flood risk area, however none of these parcels are located in a high-risk flood zone.
- 5.26 Overall, the Kirkliston site scores a much lower composite score compared to South of Riccarton, East of Riccarton, West Edinburgh and Crosswinds. This is principally due to its poor public transport accessibility and suggests this should not be considered for allocation.

### ***West Edinburgh***

- 5.27 This site is referred to as Norton Park (4) in the Environmental Report and is mainly rated neutral in our assessment, with few positives. This achieved a score of **11** in the Council's assessment and **18** in ours.
- 5.28 The differences are mainly where the Council gave negative scores, such as on the active travel question, despite the study stating that the National Cycle Network is adjacent to the site. There was also some discrepancy over flood risk (criteria A4) where the Council gave this a negative score, however, we rated this as neutral. This was on the grounds that the site was not located within a flood risk area and flooding and instability could be mitigated through design. Flood risk was also scored differently between our assessment and the Council's for criteria W2 'flood storage capacity'. The SEPA flood risk map shows that part of the site is at risk of surface water flooding, but this is minimal and can likely be mitigated through development.
- 5.29 The site scores above the lower scoring sites such as Kirkliston and Calderwood but it is still lower than South of Riccarton, East of Riccarton and Crosswinds, which raises concerns over its environmental impact and justification as a proposed greenfield release.

---

### ***Calderwood***

- 5.30 The site at Calderwood is covered by parcels Overshiel (99) and part of Bonnington (82) in the Environmental Report. Neither the Council assessment or our assessment score any of the questions positively. Their assessment has slightly fewer negatives than ours and more unknowns, however we identify more neutrals which increases the overall scoring. This is based on a positive assessment of the potential opportunities that the site's development will generate.
- 5.31 The Council score the site as negative for preventing the increase of flooding and instability, but despite parts of the site being susceptible to surface water flooding it could be mitigated through the design. Again, the Council rate greenfield sites as negative for the question in relation to a brownfield location but our scoring rates this neutrally. Having said that, our assessment does not find any merits in the site and along with the Councils scoring it represents the lowest scoring of the chosen greenfield sites.
- 5.32 The site has some negatives around biodiversity with an ancient woodland being within both parcels, but the main areas where the site scores negatively relate to its remote location. For example, the site scores poorly in relation to active travel and proximity to public transport due to there being no local facilities within the area. The site relies heavily on car borne transport as the bus service is infrequent and over a 15 minute walk from the site. Furthermore, there are no clear and defensible Green Belt boundaries for either of the parcels, nor does the site act as a logical settlement extension as it is not connected to any genuine settlement and is simply an extension to an isolated rural development.
- 5.33 It is apparent that both our assessment, which results in a score of **12**, and the Council's assessment, which results in a score of **5.5** both confirm the Calderwood site is the lowest scoring / least sustainable of the proposed allocations. On this basis, we consider it should be removed and replaced with a more sustainable alternative i.e. land South of Riccarton.

### ***Crosswinds***

- 5.34 This site is scored highly by both our assessment and the Council's. Our assessment scored the site positive on 3 additional questions to the Council's. We scored the site positively on the access to public transport due to its location to Edinburgh Airport which has a tram and train station. Interestingly, the Council scored the site negatively on this point and neutral in terms of active travel, despite there being a cycle route adjacent to the site.
- 5.35 The Council scored the site as negative for having a significant effect on the landscape setting of the city. We scored this as neutral due to its relatively urban location adjacent to the airport and employment sites that are more likely to have larger effects on the landscape.
- 5.36 Most notably, the Council score the site neutral on criteria P1 which covers air quality and noise issues, for this we suggest the site must be scored negatively due to it being directly adjacent to the airport runway/ flight path, which will generate major amenity issues for any future residents.

In fact, other airports in the UK, including Manchester, have brought in increasing restrictions on development around airport flight paths for this very reason, with latest noise data highlighting every increasing impacts. For the remaining criteria this site scores as neutral.

5.37 Our assessment scores the site with **28** points, whereas the Council's results in **18** points.

### **Conclusions**

5.38 Overall, both the Council's and our own assessment show significant variations in the scoring of the chosen sites, with the Council ranging from **5.5** to **18** and our assessment from **12** to **29**. A number of the differences relate to how we have assumed certain sites could mitigate certain impacts, hence why our scores are typically higher than the Council's. Nonetheless, there is consistency between the two assessments when considering which sites fair better when tested against the various environmental criteria.

5.39 Our assessment clearly demonstrates that the South of Riccarton site scores highly, along with the East of Riccarton and Crosswinds site. In fact, it scores highest out of all the sites assessed. The Kirkliston and West Edinburgh sites achieve middling scores, whilst the Calderwood site scores lowly in both ours and the Council's assessment.

5.40 At the very least, what this exercise demonstrates is that the South of Riccarton site must be considered as a reasonable alternative as part of the Council's SEA obligations when preparing the Local Development Plan. However, it is our strong view that based on a robust assessment of environmental criteria (both in terms of existing and potential opportunities), the South of Riccarton site should be selected for allocation and the West Edinburgh, Calderwood and Kirkliston sites omitted.

5.41 Therefore, in response to Question 12B on the consultation hub regarding greenfield sites, Wallace in principle objects to the Calderwood, Kirkliston, West Edinburgh and East of Riccarton sites due to an incomplete and inconsistent evidence base for the west Edinburgh area.

5.42 However, we strongly object on environmental grounds to the West Edinburgh, Kirkliston and Calderwood sites being proposed and object to the fact that South of Riccarton has not been identified as a proposed greenfield release site given that it scores the highest of all proposed sites in west Edinburgh.

---

## 6. CRITIQUE OF THE HOUSING STUDY

- 6.1 The Housing Study is in 2 parts, with part 2b assessing all the greenfield land in the district, split into 7 sectors and 134 sites.
- 6.2 This assesses sites against 13 individual criteria across 6 sustainability topic areas listed below (as set out at **Appendix 1**) and an overall summary of whether the site is 'suitable for development':
- Active Travel;
  - Public Transport;
  - Community Infrastructure;
  - Landscape Character;
  - Green Network; and
  - Flood Risk.
- 6.3 This is confirmed to be the key evidence base document that has informed the selection of the greenfield sites in the Plan, with these selected sites then tested further in the Environmental Report.
- 6.4 However, there are several methodological issues with the Housing Study, many of which are highlighted in previous sections. These include the lack of clarity of how sites have been identified, and the fact that they don't correlate with actual promoted sites or the other evidence base documents, both in terms of their boundaries and categorisations. This is compounded by the fact that the Council haven't officially done a call for sites, so there is no formal record of what is being promoted. This lack of clarity is unacceptable given the importance of this document in informing site selection.
- 6.5 We have also noted that the Housing Study omits a number important environmental criteria, including proximity to statutory environmental designations (which are covered in the later stage Environmental Report but only for selected sites), and as such cannot be considered a robust assessment in line with SEA requirements.
- 6.6 Furthermore, the criteria that are included do not properly assess site deliverability in terms of the existing capacity in local services, roads and public transport. Nor do they consider marketability and local market conditions. As such the assessment is too vague and does not provide a robust assessment of deliverability.
- 6.7 In addition, there are also discrepancies with how different sites have been assessed within the document.

- 6.8 Firstly, there is a level of overlap in criteria between Environmental Report and Housing Study, yet different conclusions are drawn for the same sites across the two sites, suggesting these have not been coordinated. For example flood risk is covered in both studies (in the Flood Risk section of the Housing Study and criteria W1 and W2 in the water section of the Environmental Report) yet draws different conclusions for several sites, including Kirkliston where both parcels score positively in the Housing Study, yet both score neutrally in the Environment Study even though flooding concerns are raised.
- 6.9 Secondly, as with the Environmental Report, some sites are assessed on the basis of their current position (without mitigation), whilst others are assessed on their future potential (with mitigation), which skews the results. Other scores are insufficiently justified or vague.
- 6.10 It is our strong view that given the large strategic nature of these sites, they must be considered on the basis of their future potential with mitigation, based both on the perceived opportunities in the site and the promotional and Masterplanning material submitted to date. By their very nature large greenfield sites are often in more peripheral locations and would be expected to provide their own infrastructure and services, helping them achieve positive sustainability scores.
- 6.11 The two elements that seem to generate the most discrepancies in the scoring are education and public transport/ accessibility.

### **Education**

- 6.12 In respect of education paragraphs 5.12 and 5.13 of the Housing Study note the following:
- "The five potential greenfield allocation areas identified in Choice 12 have been assessed on a stand-alone basis for their education infrastructure requirement. Each of the proposed Place Briefs within Choices for City Plan 2030 sets out the education infrastructure required based on 65 dwellings per hectare and an 80/20 house/flat split.*
- In line with an 'infrastructure-first' approach to the growth of the city, some of the potential development areas could support current Council priorities for the delivery of new infrastructure, these are Kirkliston and East of Riccarton."*
- 6.13 We take issue with the manner in which the Council have seemingly applied the principles of an 'infrastructure first' approach. Rather than undertake and publish a full assessment of where existing capacity lies within existing schools (either by virtue of space within existing classrooms or through the scope to extend existing schools on Council owned land or available neighbouring land), the Council have seemingly identified large development sites that they believe can deliver brand new schools. The latter may be a perfectly acceptable and warranted approach, but most large, strategic sites of a sufficient scale could deliver new schools. However, the evidence base is incomplete to determine if it is the most sustainable approach.
- 6.14 Indeed, if there is enough capacity in existing locations, it may prove more sustainable to utilise that available capacity in the first instance. If there is no existing capacity available and the only

option is to provide new facilities, determining which sites are best placed to provide this new educational infrastructure should be influenced by a range of sustainability criteria (including proximity to public transport provision, environmental considerations, etc). That approach does not appear to have been followed. Instead, the location for the new education facility seems to have been one of the key starting points and once that decision has been made it obviates an objective assessment of all other potential site options.

- 6.15 As previously noted, the Council’s approach to calculating education need and contributions proposed within their ‘Supplementary Guidance on Developer Contributions and Infrastructure Delivery’ was also rejected by the Scottish Government on 29<sup>th</sup> January 2019 (see **Appendix 4**), with the reporter concluding at paragraph 5.4:

*"In summary, in my view neither the supplementary guidance or the appraisal provide the kind of detailed evidence for the approach to cumulative education contributions which I would expect interested developers and landowners would wish to examine, or to allow full scrutiny of the approach to the calculations. This applies in relation to identifying the contribution to school capacity issues from new development and then justifying the approach to be taken in each contribution zone."*

- 6.16 This completely undermines the Council’s approach to education need, particularly the justification for a new secondary school at Kirkliston, and the capacity issues at Currie High School which are considered to make the South of Riccarton site undevelopable (with the study concluding ‘*There is not enough scope for development on this and nearby sites to support this level of intervention*’).
- 6.17 Furthermore, as noted in section 2, the potential for improving education infrastructure in the Housing Study is inconsistently applied, with the East of Riccarton site given a ‘partial’ score whilst South of Riccarton gets a no score despite the fact that Wallace has confirmed the development is of a scale that would be capable of delivering new education provision, and have included a primary school in their proposals. The Council’s Assessment of the South of Riccarton site goes even further and states that it may have capacity to deliver a new school were it not for the East of Riccarton site taking up the capacity. Again, this demonstrates that each individual site has not been assessed objectively or independently, with a strong element of pre-determination.
- 6.18 It is also pertinent that Heriot-Watt University is not considered to be an employment cluster for the purposes of the Housing Study, which affects the accessibility scores of the Riccarton sites, yet there is 1,916 Staff on the Scottish Campus in April 2019 (see page 7 of attached at **Appendix 5**) so it is clearly a major employer with the potential for significant further growth with the linkages, infrastructure improvements, and population growth proposed by the South and East of Riccarton sites.

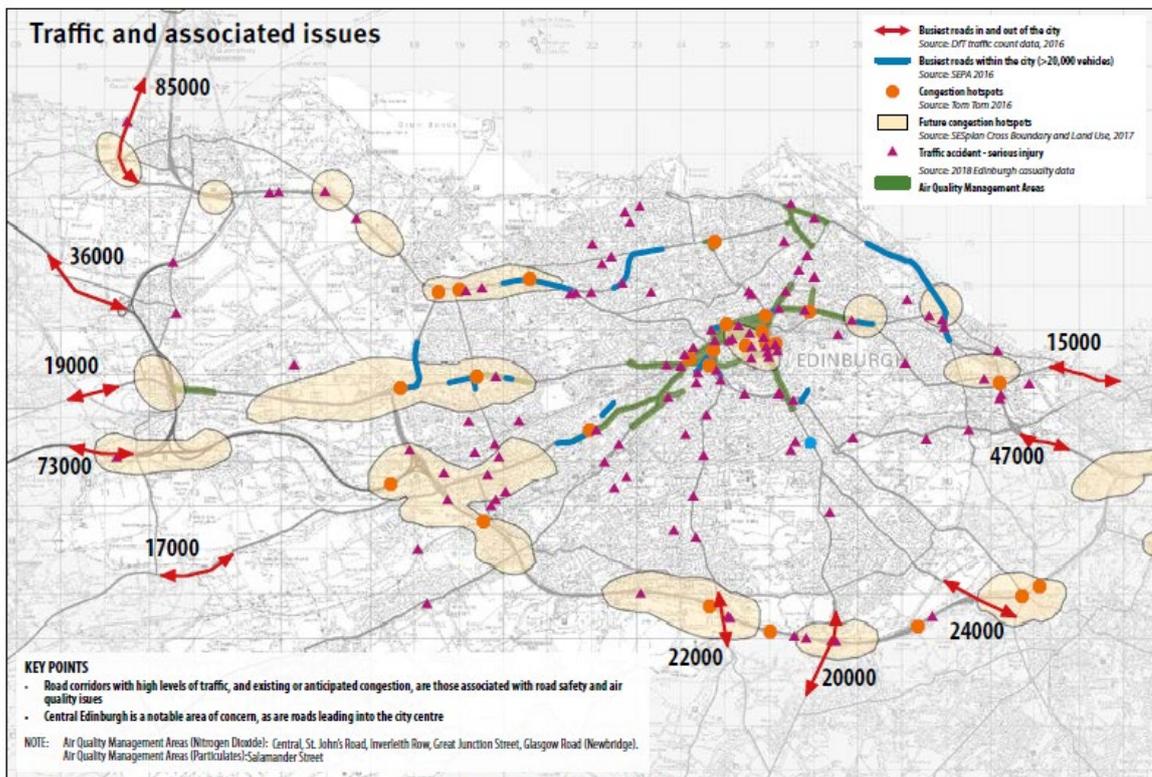
### **Public Transport / Accessibility**

- 6.19 Notwithstanding the discrepancies raised in section 3 with the Jacobs Edinburgh Strategic Sustainable Transport Assessment (ESSTS), the most obvious point to note is that some of the

greenfield sites that have been selected simply don't support the key Local Development Plan objective of reducing the reliance on the private car and Edinburgh City Council's objective to be a carbon neutral City by 2030 (as confirmed in the City Mobility Plan – Case for Change P3). Most notably, the sites at Kirkliston and Calderwood are not on the rail or tram network and do not sit within a sustainable transport corridor as identified by the ESSTS. Whilst there are future plans for a rail link to Kirkliston, known as the 'Almond Chord', this has been in the pipeline for years but is at a preliminary stage. What's worse is that both of these locations for development will inevitably increase commuter traffic travelling into the City Centre from the west, where the existing network is already under stress, particularly the Newbridge Roundabout. As such, neither of these sites should be within the City Choices Plan.

6.20 In terms of existing road capacity around the West Edinburgh site, the ESSTS states (at page 75), that the A8 Glasgow Road that fronts the site is "among the more direct and less congested radial corridors", which has clearly factored into its accessibility scores in the Housing Study; however we would disagree with this, as it underplays the extent of existing congestion on this route at peak times, which affects the operation of the Newbridge Roundabout and the Gogar roundabout. This is illustrated by the plan on page 6 of the City Mobility Plan shown at figure 6.1 below which shows that there is a convergence/ funnelling of traffic coming from the west towards the A8 Glasgow Road. This must therefore include a proportion of the traffic coming from those other routes (so some of the 36,000 from the M9 and 73,000 from the M8) on top of the 19,000 directly attributed to the A89/ A8 route.

Figure 6.1 – Existing Traffic Flows (Page 6 of City Mobility Plan)



Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown Copyright and database rights 2019. All rights reserved. Ordnance Survey Licence Number: 100023430.

- 6.21 In addition, the West Edinburgh site scores positively on the basis of potential tram extension, yet the feasibility for this has not been evidenced, and pedestrian linkages to the existing tram stop are poor (involve crossing a dual carriageway and through an underpass).
- 6.22 Yet the South of Riccarton site scores poorly on active travel and accessibility even though it is within a Transport corridor and directly adjacent to a train station, with a public transport hub (train and bus interchange, and park and ride proposed within the development. The development could provide the demand to support Bus Rapid Transit between the Transport Hub and the city centre. The Study notes that transport interchanges are important but simply don't justify their weighting in the evidence.

**Comparative Housing/ Sustainability Study**

- 6.23 We have carried out our own Housing/ Sustainability Study of the chosen sites in west Edinburgh (including the 4 greenfield sites and the brownfield site at Crosswinds). This assessment is provided at **Appendix 6** and is summarised then compared with the Council's own assessment in the table below (Figures 6.3).
- 6.24 As with previous sections, we include the South of Riccarton site being promoted by Wallace as an example of an alternative site that is not proposed for release. We also provide our own scoring system again for comparative purposes as the Council's assessment does not provide a total score for each site.
- 6.25 The proforma scoring system has three options to the answers: Yes, Partially and No. For a site to be classed as partially it states that a suitable intervention (i.e. mitigation) must be in place. Looking into what these interventions actually are to class it as 'partially' could help identify what interventions are actually needed.

Where there are multiple parcels within the general allocation (i.e. Kirkliston and Calderwood), we provide a composite/average score for the relevant parcels, as we did in section 5.

*Figure 6.2 – Pegasus Housing Study Scoring*

Key of Council's Assessment	Pegasus scoring:
Yes	2
Partial	1
No	-1
Unknown	0



6.26 We summarise the key findings and differences below for each of the sites:

***South of Riccarton***

- 6.27 The Council's Housing Study scored South of Riccarton lowest of the six sites considered here, is with Kirkliston being the next lowest, whereas our assessment scores South of Riccarton highest with East of Riccarton just behind.
- 6.28 In the Council's assessment the site scores mainly negatively with some neutral, whereas our scoring is mainly neutral and positive with no negatives or unknowns. The Council scored the sites active travel provision negatively based on the fact that the site is not in walking distance to convenience stores and employment and lacks access to wider cycle network, however this is something we disagree with, given the proposed local centre in the development, footpath and cycle linkages, and the fact that Heriot-Watt is a major employer (as well as a Higher Education facility). The Council also scores the site negatively on public transport despite there being a train station immediately adjacent to the site and community infrastructure, again this is something we disagree with and score positively. There is also a bus service within the area that has regular and multiple routes across the local area.
- 6.29 Furthermore, in terms of existing road capacity, which this study fails to assess, the plan at Figure 6.1 (from page 6 of the CMP) shows that this is the least congested corridor in west Edinburgh (and certainly far less congested than the A8 Glasgow Road Corridor around the West Edinburgh site).
- 6.30 As well as the site being able to provide local amenities, there are employment links and shopping areas in Sighthill that can be easily accessed from the site either by existing bus and train routes or via new improved connections to the existing cycle route. In turn, this will reduce car trips.
- 6.31 There is also education provision in Currie which the Council's assessment does not take into account and is not clear on what is meant by infrastructure capacity. In light of this the Council's assessment score totals **-5** due to the number of negatives compared to our scoring which totals **17**.
- 6.32 This strongly suggests that this site should be allocated.

***East of Riccarton***

- 6.33 The scoring for this site was mainly negative and neutral with one positive, with the positive being for the landscape character of the site to prevent coalescence of settlements. We agreed with this to some extent but development on the site would join Riccarton to Wester Hailes so our assessment scored this as 'partial'. Our assessment mainly scored the site as positive and neutral and it outscored South of Riccarton in terms of its proximity to convenience services within walking distance.

6.34 The site scored very similar to South of Riccarton (with the Council’s score totalling **0** and our score totalling **16**), so based on the criteria in this assessment we conclude that this site should be considered for allocation as proposed.

### ***Kirkliston***

6.35 The site at Kirkliston is split into four parcels, albeit the majority of the allocation falls within two – ‘Craigbrae’ and ‘North Kirkliston’ so we have only considered these here (as the other two parcels are much larger and the findings will therefore not be representative of the small parts in the allocation. This differs from the Environmental Report where the four parcels accurately reflect the allocation). This site is scored the second lowest in the Council’s Housing Study (with a composite score of **-4**) and within our assessment (with a composite score of **-1.5**). The site mainly scored neutral in the Council’s assessment, with positives in relation to flood risk, walking distance to convenience stores, access to education and access to the green network.

6.36 We dispute the scoring on access to convenience stores, as the nearest convenience store is a 15 minute walk from the site and therefore does not meet the Council’s criteria of a 10 minute walk time, and is only a very modest convenience offering. We also dispute the findings on access to education in line with our general comments above.

6.37 We agree with the Council that score the site negatively in terms of public transport provision due to the lack of train station and relatively poor bus service (6 regular services through the settlement), particularly when compared to Riccarton (11 regular services).

6.38 There are very few public amenities in Kirkliston in terms of employment, shops or schools. In terms of food shopping there is a small Scotmid Co-op within the town, but no major supermarket, and given the limited active travel links this ensures that residents will already be reliant on their cars for main food shopping. Further development here will undoubtedly increase car borne trips further and put more pressure on the crossroads within the centre of Kirkliston which already experiences considerable congestion issues at peak times, and has no scope for improvement or reconfiguration due to existing built form.

6.39 Therefore, based on our assessment the site is unsustainable and should not be considered for allocation.

### ***West Edinburgh***

6.40 The site achieves a score of **9** in the Council’s assessment and **15** in our assessment so we broadly agree with the Council’s scoring on this site.

6.41 The differences were mainly due to the Council scoring the site negatively on the public transport provision despite the site being a ten minute walk from Ingliston Park and Ride. We agree the walk may not be pleasant for people as it requires going under the dual carriageway and crossing a busy roundabout but there is a bus stop on Glasgow Road which has frequent services to a variety of

places in the local area. The site is also scored negatively due to the lack of primary school, however there is a primary school (Hillwood) a 20 minute walk from the site.

- 6.42 The site scores third in our assessment behind East of Riccarton and South of Riccarton, suggesting it is potentially suitable for allocation if suitable mitigation is proven to make the site sustainable.
- 6.43 That said, in wider policy terms, the site is located within the defined boundary of national development 'Strategic Airport Enhancements', as set out section 10 of Annex A of Scotland's Third National Planning Framework (NPF3 – June 2014); which covers Edinburgh Airport, along with Glasgow Prestwick, Glasgow International, Aberdeen and Inverness, and adjoining land. A map showing sites within this national designation is provided on Figure 6.4 over the page for clarity.
- 6.44 This site is currently identified as the location for the relocated National Showground with no provision for residential uses. Therefore, as things stand, housing on this site would directly conflict with national policy. In principle, Wallace object to this proposed greenfield area for housing and it cannot be considered as suitable or deliverable unless NPF is revised to establish such uses as appropriate under 'Strategic Airport Enhancements' or amends its boundary to exclude this site.

### ***Calderwood***

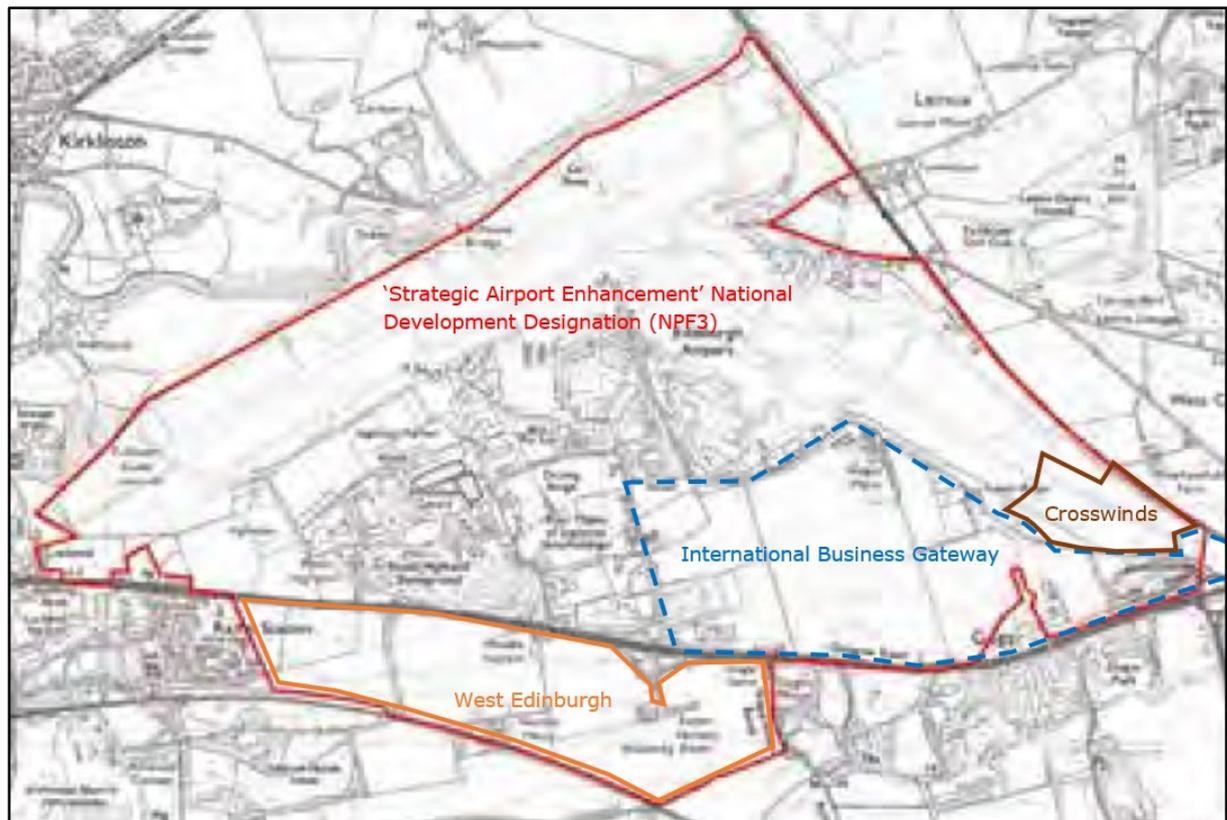
- 6.45 The site at Calderwood is covered by parcels Overshiel and partially by Bonnington in the Housing Study. The Council score some of the aspects positively such as flood risk and access to convenience stores (from Overshiel). We query the positive scoring on Flood Risk and rank this neutrally, due to parts of the site showing some risk of flooding. In terms of walking distance to convenience stores, we disagree with this as currently there are no facilities in close proximity to the site and the Council scores this question based upon the masterplan for the adjacent development. The Council do not comment on the education provision due to the catchment being within West Lothian, however our assessment picks up on the fact that there are no educational facilities in close proximity to the site, with no robust evidence for future provision, so we score this negatively.
- 6.46 The site scores particularly poorly in respect of public transport accessibility, as there is no train or tram station and a very limited bus service (comprising a single service from the B7015, the X27, which is very slow during peak hours due to the lack of a bus lane into the City on the A71). Again, development here will undoubtedly increase car journeys and traffic on the A71 into Edinburgh, in direct conflict with the City Mobility Plan.
- 6.47 Other than this, the Council's assessment is broadly in line with our assessment producing a combined score of **-6** which is far and away the lowest scoring site (indeed it is the only minus score in our assessment). The Council's provides a composite score of **-2.5** which makes it their third lowest ranked site. Accordingly, based on our assessment the site is highly unsustainable and should not be considered for allocation.

---

### **Crosswinds**

- 6.48 Crosswinds is assessed in the Council’s Housing Study with other brownfield sites. The assessment criteria is slightly different to the greenfield housing sites and does not assess the site on landscape character nor regarding the green network. The Council’s assessment scores the site at **9** but we note that the Council’s assessment does not confirm the site is within an SDA, when it is. It is also pertinent that the Council’s summary only scores it yellow/ partially suitable for development, where the other chosen sites score green/ suitable for development. Our assessment scoring stands at **11** which is below South of Riccarton, East of Riccarton and West Edinburgh, but above Kirkliston and Calderwood.
- 6.49 Overall the site scored mainly positive and neutral but there were a few questions where the site scored negatively. This was due to the site being located 15-20 minutes’ walk from a convenience store and other shopping facilities based upon the Council’s criteria, contrary to this the Council’s assessment scored the site positively on this. The site also scored negatively in both our assessment and the Council’s as the nearest primary school and secondary school are over a 30 minute walk from the site.
- 6.50 Notwithstanding these scores, in wider policy terms, as with West Edinburgh, the site falls within the defined boundary of the ‘Strategic Airport Enhancements’ national development (Section 10, Annex A of NPF3), as shown on figure 6.4 below, and described at page 13 of NPF3:
- "West Edinburgh is a significant location for investment, with the airport, the National Showground and the International Business Gateway. Development here will require continued co-ordination and planning to achieve a successful business-led city extension which fulfils its potential for international investment, new jobs and high quality place."*
- 6.51 This makes it clear that this is intended to be a business led, employment generating area, with no specific provision for housing. The national policy direction would therefore need to be changed before residential allocations could even be considered within this area.

*Figure 6.4 – Map of sites and designations at Edinburgh Airport*



6.52 Both Edinburgh Airport<sup>5</sup> and British Airways<sup>6</sup> made strong objections to proposals for housing at the adjacent International Business Gateway site in the last Edinburgh LDP review (between 2014 and 2015). In addition to questioning the principle of development based on NPF3, they also stated that siting housing so close to the airport would generate noise issues and other conflicts which could then impact on the future operation of the airport, as summarised by Holder Planning in their conclusion (para 5.3):

*"Edinburgh Airport has serious concerns that the proposed reconfiguration of the IBG to accommodate a significant component of residential use will prejudice the operation of the Airport, particularly in respect to potential traffic implications and potential conflict arising from airport activities and residential amenity, particularly noise impact."*

6.53 These points of objection are equally applicable to other sites in close proximity to the airport, notably Crosswinds which is basically a subsidiary of the airport, and West Edinburgh which is within the 'Strategic Airport Enhancements' area.

<sup>5</sup> Submitted through Holder Planning – 'Edinburgh LDP Examination - Further Information Request 22 & 23 - International Business Gateway Submission on Behalf of Edinburgh Airport' (January 2015).

<sup>6</sup> Submitted through Lichfields – 'Edinburgh Local Development Plan – Second Proposed Plan - Representation Form' (October 2014).

- 
- 6.54 In principle, Wallace object to this proposed area for housing and it cannot be considered as suitable or deliverable unless NPF considers such use to be appropriate in the 'Strategic Airport Enhancements' development area or amends its boundary to exclude this site.

### **Conclusions**

- 6.55 Overall, both the Council's and our own assessment show significant variations in the scoring of the chosen sites, with the Council ranging from **-5** to **9** and our assessment from **-6** to **17**.
- 6.56 Our assessment clearly demonstrates that the South of Riccarton site scores highly, along with the East of Riccarton site; in fact it scores highest out of all the sites assessed. The West Edinburgh and Crosswinds sites achieve middling scores, whilst the Calderwood and Kirkliston sites scores lowly in both ours and the Council's assessment.
- 6.57 As such it is our view that based on a robust assessment of general sustainability and accessibility criteria (both in terms of existing and potential opportunities) the South of Riccarton site should be allocated; whilst the Calderwood and Kirkliston sites should definitely be removed. In addition, the national policy status of the land around Edinburgh Airport would need to be changed before the West Edinburgh and Crosswinds sites can be considered suitable or deliverable for housing use.
- 6.58 Therefore, in respect of Question 12B, Wallace strongly objects to the proposed sites of Kirkliston, Calderwood, West Edinburgh and Crosswinds being chosen, and to the South of Riccarton site being omitted as it scores highest out of all the west Edinburgh sites.

---

## 7. CONCLUSIONS

7.1 This representation has undertaken a detailed review of the Edinburgh Choices for City Plan 2030 and its supporting evidence base and identified a number of major flaws and inconsistencies in the site selection process, focusing on housing release in west Edinburgh, which can be summarised as follows:

- The Environmental evidence fails to meet the Strategic Environmental Assessment requirement to consider reasonable alternatives.
- Outright errors in the evidence (including an incorrect boundary of transport corridor 8 West of Hermiston, thus missing Curriehill train station; and a lack of an Education Impact Assessment to properly assess education requirements).
- An inconsistent approach to the parcelisation and labelling of sites across the different evidence base documents, which makes overall assessment and comparison of sites extremely difficult.
- Inconsistent assessment of sites in terms of mitigation opportunities, with some assessed on their existing situation, with others on their future potential, which skews the scoring.
- A general lack of clarity and consistency in the individual criteria assessments within the housing and environmental report.
- A Landscape Assessment that suggests that two of the proposed greenfield allocations (Kirkliston & Calderwood) are undevelopable on landscape grounds.
- Two of the Council's Preferred greenfield sites (Kirkliston & Calderwood) are not located within any sustainable transport corridor, and do not comply with the Council's Zero Carbon agenda and City Mobility Plan objectives.
- Two of the Council's Preferred sites (Crosswinds & West Edinburgh) are located within NPF3's 'Strategic Airport Enhancements' area, which does not make provision for housing, and would therefore require a change in national policy direction before they could even be considered as potentially suitable or deliverable for housing use.

7.2 To address these issues we have provided our own assessments (in sections 5 and 6) based on the criteria in the Council's Environmental Report and Housing Study. These compare the chosen sites in west Edinburgh (including the 4 greenfield sites and the brownfield site at Crosswinds), as well as the South of Riccarton site being promoted by Wallace, which we consider to be the highest scoring site in west Edinburgh, thus meriting the support of the Council as a greenfield release site or at the very least being identified as a reasonable alternative.

7.3 This assessment concludes the following:

- The South of Riccarton site scores the highest in both the environmental and housing study scoring exercises. This is due to its location within a sustainable transport corridor (8- 'West

of Hermiston') benefiting from active travel connections, 11 existing bus services and a half hourly train service (via Curriehill train station) in the peak hours, direct access to employment opportunities at Heriot-Watt (economic growth hub), potential for education and service improvements (new Riccarton Village centre), relatively limited landscape impacts (capacity for development – Council CAA 45) and other environmental constraints. On this basis, South of Riccarton should be the Council's first preferred choice for greenfield development in west Edinburgh and is closely followed by the East of Riccarton site.

- The West Edinburgh site has good accessibility to employment opportunities at the airport and the tram to the City Centre, albeit pedestrian and cycle permeability isn't great, nor is access to existing educational or community services. However, the site's low environmental score in comparison to South of Riccarton, East of Riccarton and Crosswinds suggests that this site has a greater environmental impact. Fundamentally however, in policy terms, bringing forward housing on this site would directly conflict with NPF3. Wallace therefore objects to the West Edinburgh site's potential allocation.
- Crosswinds is a logical release in some respects given it has strong boundaries, brownfield land with strong transport links, however its proximity to the airport will generate significant noise and air quality issues, and it also occupies an elevated position meaning it could have landscape impacts. Fundamentally however, bringing forward housing on this site would also directly conflict with NPF3. Wallace therefore objects to Crosswind's potential allocation.
- The Kirkliston and Calderwood sites are not located in a sustainable transport corridor as identified by the ESSTS. Both are isolated from public transport options and would therefore be over reliant on car borne transport, putting additional pressure on the local network west of Edinburgh which is already under stress (most notably at the Newbridge roundabout). Significant landscape issues have also been raised in the Council's own evidence, and flood risk issues are also identified. There are also potential deliverability and market saturation issues in these locations given that Kirkliston has recently been substantially expanded and Calderwood in West Lothian is still under construction. All the evidence suggests these potential greenfield sites are not suitable or sustainable. Wallace objects to the potential allocations at Kirkliston and Calderwood.

7.4 Notwithstanding the above, the evidence base for site selection in the west Edinburgh area overall is incomplete and flawed and as a result, Wallace objects in principle to any site allocations in west Edinburgh at the present time. As such we would ask that the evidence base and approach to site selection is reconsidered before the next stage of the Local Development Plan to ensure it is robust and in line with the relevant environmental guidance and national policy.

7.5 We would also respectfully request that the South of Riccarton site is considered for release as this representation has demonstrated that it scores the highest when compared against the sites preferred by the Council. South of Riccarton is already an accessible and sustainable site (within

---

sustainable transport corridor 8 – ‘West of Hermiston’ in the ESSTS) with significant opportunities for infrastructure improvements that are deliverable within the plan period. These representations should be read in conjunction with the further representations submitted on South of Riccarton by Geddes Consulting on behalf of Wallace.

---

**APPENDIX 1 – COMPARATIVE PROFORMA ASSESSMENT QUESTIONS**

**APPENDIX 1 - COMPARATIVE ASSESSMENT OF CRITERIA IN THE HOUSING STUDY AND THE ENVIRONMENT ASSESSMENT**

Housing Study January 2020	Assessment Criteria Key Features
<b>SDP1 SDA Areas</b>	
Does the site fit within an area identified as a strategic development area?	Assessed as being within an area identified in SDP1 as being within an area identified as a Strategic Development Area. SDP1 directs local authorities to identify the broad location of any additional sites that are required up to 2030 within these areas
<b>Active Travel</b>	
Does the site support travel by foot to identified convenience services? If not, can foot access be improved or services provided within walking distance through an appropriate intervention which is deliverable in the plan period?	Walking time to convenience stores. Sites within walking distance to support non-car travel. 10 minute walk time - 800m distance taking physical barriers and social barriers into account e.g. street lighting  <i>"If the site is within walking distance of grocery shopping and existing and committed employment clusters it will be classed as yes. If the site is not within walking distance of these but access can be improved or shopping can be provided within walking distance through a suitable intervention it will be classed as partially suitable. If neither of these conditions are met the site will be classed as no."</i>
Does the site support travel by foot to identified employment clusters? If not, can foot access be improved or employment provided within walking distance through an appropriate intervention which is deliverable in the plan period?	Assessed by walking time to existing and committed employment clusters 30 minute walk time to employment <i>"If the site is not within walking distance but can be improved by suitable intervention it will be classed as partially"</i>
Does the site have access to the wider cycle network? If not, is the site potentially served by an identified cycle route intervention project which is deliverable in the plan period?	Proximity to Quiet Route and NCN or the sites potential connection
Does the site support active travel overall?	Comprises of both foot and cycle assessments
<b>Public Transport</b>	
Does the site support travel by public transport? If not, is the site potentially served by an identified public transport intervention project which is deliverable in the plan period?	Public transport is assessed by access to bus service with PTAL (public transport accessibility level) score of mainly 3 or higher, rail stations within walking distance and existing/committed tram within walking distance taking service capacity into account.
<b>Community Infrastructure</b>	
Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention? Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention? If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?	If there will sufficient space at existing schools to accommodate pupils generated by new housing.  If the site does not have sufficient capacity but could be mitigated through appropriate intervention it will be classed as partially suitable.
<b>Landscape Character</b>	
Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?	Assessed based on landscape and visual assessment which identifies landscape and visual constraints and designations and scope for development in terms of landscape character and visual impact.
<b>Green Network</b>	
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?	Assessment of both present land use (open space and core path network) and identified landscape-scale areas which could be considered to be part of the wider strategic network, based upon landscape assessment and any network opportunities identified in the 2013 SESPlan. Defined as connected areas of green and blue infrastructure which should be multi-functional and joined together strategically.
<b>Flood Risk</b>	
Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?	Assessment of SEPA identified areas at <i>medium-high flood risk (defined as at risk of 1-in-200-yr fluvial flooding)</i> and council info on <i>areas important for flood management</i> . Rules out areas at risk of regular flooding. When it has those designations it will be classed as 'partially' provided they don't cover a major area for the site then it will be a 'no'.
<b>Summary</b>	
Summary of site opportunities and constraints	Summary takes into account overall community infrastructure and overall active travel

Environmental Report	Methodology for Assessing Choices
<b>Biodiversity, Fauna and Flora</b>	<b>To protect and enhance biodiversity, flora and fauna and habitat networks</b>
B1	Would site protect and or enhance the integrity of a European and/or National designated biodiversity site?
B2	Would the site protect and or enhance the integrity of local designated biodiversity sites and wildlife sites?
B3	Would the site protect and or enhance the integrity of existing habitat networks and other wildlife corridors?
B4	Would the site protect and or enhance protected species?
B5	Would the site protect and or enhance ancient woodland?
<b>Population and human health</b>	<b>To improve the quality of life and human health for communities</b>
P1	Would the site be located away from regulated site which would increase the population affected by nuisance (odour, noise), poor air quality or regulated major hazard?
P2	Would the site have an impact on designated quiet areas or noise management areas?
P3	Would the site provide opportunities for active travel or recreation?
P4	Would the site provide opportunities for social interaction and inclusion?
<b>Soil</b>	<b>Protect the quality and quantity of soil</b>
S1	Would the site be located on brownfield land?
<b>Water</b>	<b>Prevent the deterioration and where possible, enhance the status of the water environment and reduce/manage flood risk in a sustainable way</b>
W1	Does the site protect and enhance the water status of major water bodies?
W2	Does the site add to flood risk or reduce flood storage capacity?
<b>Air and Climatic factors</b>	<b>Maintain and improve air quality and reduce the causes and effects of climate change</b>
A1	Does the site provide good accessibility to public transport?
A2	Does the site provide good accessibility to active travel networks?
A3	Does the site affect existing AQMAs?
A4	Does the site prevent increased flooding or instability as a result of climate change?
<b>Material Assets</b>	<b>Minimise waste and promote the sustainable use of natural resources</b>
M1	Does the site result in the loss of/have adverse effects on open space?
M2	Does the site provide access to open space, greenspace/recreational provision?
<b>Cultural Heritage</b>	<b>Protect and where appropriate, enhance the historic environment</b>
H1	Does the site have significant effects on Listed buildings and their settings?
H2	Does the site have significant effects on scheduled monuments and their settings?
H3	Does the site have significant effects on conservation areas?
H4	Does the site have significant effects on the outstanding value of the World Heritage Sites?
H5	Does the site have significant effects on Historic Gardens and Designed Landscapes?
H6	Does the site have significant effects on non-designated heritage assets?
<b>Landscape and Townscape</b>	<b>Protect and enhance the landscape character and setting of the city and improve access to the open space network</b>
L1	Does the site have significant effects on the landscape setting of the city or its townscape?
L2	Does the site enable clear and defensible green belt boundaries to be formed?
L3	Does the site have significant effects on the designated landscape areas?
L4	Does the site support the delivery of the green network?
L3	Does the site have significant effects on the designated landscape areas?
L4	Does the site support the delivery of the green network?

---

**APPENDIX 2 – LANDSCAPE ASSESSMENTS OF WEST EDINBURGH GREENFIELD SITES**

**APPENDIX 2 - LANDSCAPE CONCLUSIONS FOR WEST EDINBURGH GREENFIELD RELEASE SITES (INCLUDING SOUTH RICCARTON SITE)**

Site	Sector	Council CAA	Council LCA	Key Factors Considered in Assessment	Assessment and Conclusions on Scope for Development	Overall conc
South Riccarton	4	<b>45</b> (South of Riccarton- all) & <b>46</b> (Currievale- all)	<b>LCA 27 Gowan Hill farmland - all most all.</b> A narrow corridor of largely arable farmland lying between the wooded policies of Dalmahoy and the linear settlement of Currie and tapering south of Kaimes Hill towards its western boundary. The area forms a gentle valley, contained to the south by the twin hills of Kaimes and Dalmahoy and a long ridge extending east. A railway and transmission lines are aligned through this landscape. The landscape becomes more fragmented on the urban fringes of Currie and Dalmahoy Hill. Woodland areas on the Riccarton Campus. While this area has high inter-visibility with Currie, it is largely screened from view from key roads and from Edinburgh, due to the containment provided by adjacent landform and woodlands.	Flood Risk Murray Burn <b>(45)</b> / Dalmahoy Inventory site - E part <b>(45)</b> / Core path 16, 17 <b>(45)</b>	<b>CAAs 38, 45 and 46</b> form a shallow valley, contained by woodland on the edge of Dalmahoy designed landscape and the Riccarton campus and by a ridge to the south where the settlements of Currie and Balerno are located. Woodland and landform provide opportunities to create robust new boundaries to development (Photograph 4A). High voltage transmission lines and a railway line cross this landscape and these features would be likely to constrain development. The Murray Burn flows through this landscape and is traced by some scrub and wetter ground; flood risk is a constraint in the eastern part of the valley floor. Steep slopes occur to the west below Balerno. This landscape comprises productive farmland and some small clustered farms and converted steadings are set on south-facing slopes. These CAAs lie close to Currie and Balerno and, although extensive housing development across this LCA would conflict with the largely linear form of these settlements and would adversely affect the more strongly rural landscape present to the north of the Murray Burn, the area is visually contained. <b>There is scope for development to be accommodated on valley sides with opportunities to create a substantial Green Network and SUDs feature along the Murray Burn as a focus for any development. Off-road cycle and walking routes to Currie and Currie Station would need to be created and consideration should be given to undergrounding transmission lines with the visually discrete Long Dalmahoy area being a preferable site for terminal towers.</b>	Scope for devt but signif impacts
East Riccarton	4	<b>24</b> (East of Riccarton- all)	<b>LCA 29 Gogar farmland and institutions – all.</b> The boundaries of this LCA are formed by the A8, A71 and the city by-pass. To the west, there is a more gradual transition with the adjacent Ratho Farmland LCA. The remnant wooded policies of the late 19th century Gogarburn House in the north accommodate the RBS HQ. Wooded policies also form the setting for the Gogar golf course and the Inventory listed designed landscape of Millburn Tower. Gently undulating land at the core of this character area is occupied by broad open fields used for experimental cropping associated with the Scottish Agricultural Science Agency (SASA). The narrow valley of the Gogar Burn is fringed on its north side by some housing and associated wooded grounds. The Union Canal threads through a narrow corridor, hemmed in between the M8 and the A71. Although close to major transport routes, woodlands visually contain this LCA and also screen large scale buildings, sited within former policies. The Millburn Tower and Gogar Park policies form a continuous wooded backdrop set behind a foreground of arable fields which is highly visible from the city by-pass.		No commentary.	
			<b>LCA 30 East Hermiston farmland – all.</b> This area of arable farmland with some wooded policy features rises gently to the south towards Hermiston and the A71. The M8 and the Union Canal are aligned through this landscape. Intensive poultry production units and some industrial development are dispersed within farmland. The city by-pass creates a strong edge of roadside embankments and tree planting to the city.	Flood Risk Gogar Burn <b>(24)</b>	Notes CAAs are considered under LCA 29, but no specific commentary.	
			<b>LCA 31 Baberton farmland - almost all.</b> A band of gently rolling arable farmland, lying to the west of the city by-pass and gradually rising in a series of softly rounded and stepped ridges from the A71 in the north to the foot of the Pentland Hills to the south. A golf course is sited within the former policies of the early 17th century Baberton House. The late 20th century housing development of Baberton contrasts with the distinctly linear settlements of Juniper Green and Currie bordering the Water of Leith. This LCA is influenced by high-rise housing on the edge of the city, transmission lines, railway and roads.	Ancient Woodland <b>(24)</b>	<b>CAA 24.</b> The 2014 Environmental Report concluded that this was not currently a reasonable site for housing development. Landscape and visual constraints included effects on the landscape setting of the city, conflict with the existing character of settlement and the inability to provide suitable green belt boundaries in the local area. The CAA is bounded by the city by-pass to the east and the M8 to the north. The A71 crosses this CAA and a railway line forms the southern boundary. These major transport routes, together with views of higher buildings within nearby Sighthill, the prominent Oriam sports facility within the Heriot Watt University campus, high voltage transmission lines and the Hermiston Park and Ride facility, contribute to the fragmented and semi-developed character of this landscape (Photograph 4B). Housing within Baberton is also visible on rising slopes to the south of this CAA and immediately west of the by-pass. This CAA comprises gently rolling slopes and valleys with a distinct east-west grain, rising gradually to the south. The Hermiston Conservation Area adjacent to the A71, the Heriot Watt University campus at Riccarton and Baberton Golf course are set within wooded surrounds, providing distinctive landscape features and some visual containment of this CAA. While development of this CAA would breach the robust city boundary provided by the by-pass, these peripheral wooded landscapes provide an opportunity to create new settlement boundaries and limit visibility of development from more strongly rural landscapes to the west. The Union Canal crosses this landscape and is important as a Green Network feature, linking city and countryside. It is not widely visible as it lies in a dip, which also limits views out from the canal and towpath. The generally inconspicuous Murray Burn also flows west-east in a shallow trough across arable fields north of the A71. Opportunities to enhance Green Networks could exist provided that generous undeveloped space was retained around these features. This CAA is prominent in views from the A71 and the approach to the city from the west, from some housing on the western fringes of the city, at Baberton and Juniper Green and from a more open section of the city by-pass near the Hermiston junction. Although development of this CAA would substantially change views (for example from the A71 to the Pentland Hills) views to and from this landscape are not highly scenic, due to detractors such as roads infrastructure, high-rise housing and transmission lines. As a result, this CAA does not make a strong contribution to the setting of the city when compared with other landscapes. The city by-pass presents a physical and perceptual barrier to close integration with existing urban areas on the western edge of Edinburgh. The complex infrastructure of the M8 and A71 could also inhibit the design of a cohesive housing development. There would be some adverse effects on the linear settlement pattern of Currie and Juniper Green which border the Water of Leith, although this pattern is less distinct in views from the north, and housing at Baberton has also already weakened it. <b>Overall, it is considered that although some significant visual impacts and breaching of the existing settlement boundary provided by the bypass could arise there is scope to accommodate development in this CAA. This is due to its less strongly rural character and because opportunities exist to create new robust settlement boundaries to the west and south. Careful design would be necessary to achieve a cohesive development and enhance its landscape setting. This should include undergrounding high voltage transmission lines between the existing sub-station at Corslet and the two terminal towers close to the city by-pass. Generous landscape buffers should also be provided around the Murray Burn and Union Canal with associated enhancement and the creation of safe pedestrian and cycle routes across the M8 and A71.</b>	

Kirkliston	5	19 (North Kirkliston- all), 20 (Craigbrae- part), 26 (Carlowie Castle- part), 29 (Conifox- most)	LCA 10 Almond farmland – almost all. This is an extensive character area and the topography ranges from the gently sloping farmland around Craigie Hill, Cammo and Dundas to the flatter landscape closer to Edinburgh Airport. Subtle dips and knolls are sometimes emphasised by woodland, particularly in the area around the Carlowrie Estate. This character area is crossed by the River Almond, which meanders along the flat and open valley floor. Arable fields cover much of the area and these are enclosed with a mix of hedgerows, fences and walls, with occasional field boundary trees. The landscape is crossed by a series of minor roads, the main rail line to Fife and the M9 extension and is very visible from these routes. Edinburgh Airport has a strong influence on landscape character. The area is relatively sparsely settled with scattered stone farm houses and steadings.	Flood Risk (26), (29) / Designed Landscapes (26)	CAAs 19 and 20 abut the north and north-eastern edges of Kirkliston. This settlement is associated with the River Almond, but set on south-facing slopes above the floodplain. The settlement is tightly contained by the rail line, M9 and M90 spur road, which loop around its western and northern edges. These embanked transport routes provide robust but unattractive boundaries to the settlement. Any further extension north and westwards would breach these, so visually and perceptually separating any new development from the existing settlement. There is no robust edge to recent housing development adjacent to CAA 20 and any expansion of Kirkliston in this area would need to extend considerably to the north-west to take advantage of a change in landform which could provide the basis for a suitably robust boundary to be created. Development in this area would therefore lie at a substantial distance from the core of Kirkliston. <b>There is no scope for development in this CAA.    CAA 26</b> comprises open farmland, where only the woodlands and outcrop knolls and ridges associated with the Carlowrie estate could readily provide a robust new settlement boundary. Development in this area would consequently lie at a considerable distance from the core of Kirkliston and would breach the existing firm settlement boundary. <b>There is no scope for development in this CAA.    CAA 29</b> comprises the former plant nursery of Conifox, which was closed in late 2018. While much of this area lies within the floodplain of the Almond, it is close to the core of Kirkliston and is visually contained by woodland and high hedges. <b>There is some scope to accommodate housing in this area, provided that the setting to Foxhall House, its parkland and walled garden is protected. There may also be opportunities to create an attractive riverside park and recreational routes in this area to enhance the landscape setting of Kirkliston.</b>	No scope for devt on majority of site
West Edinburgh	4	19 (Norton Park- all)	LCA 9 West Craigs Farmland – part. An area of gently undulating to flat farmland lying to the west of the city and crossed by the A8, airport and railway line. To the south, this landscape merges with the Ratho Farmland which forms a more homogenous swathe of farmland with a distinctive enclosure pattern. This LCA is bordered by industrial development on the edge of Edinburgh, the Airport and Ratho. Large arable fields have an open character and intensive poultry production features in the Norton area. Farmland is fragmented by development and transport corridors. Views are open and extensive and focus on the distant Pentland Hills and the rolling well-wooded hills north-west of the city.	Flood risk over a small part of this CAA	CAA 19 comprises north-facing slopes, bounded by the A8 to the north and the railway line to the south. Mature trees and woodland on the west side of the main approach drive to Norton House Hotel would provide a degree of enclosure to new development and, although there would be some views from the railway and A8, visibility would not be widespread or sustained, given the speed of travel and presence of screening vegetation. Development in this area would also be associated with housing at Ratho Station. The area to the east of the main hotel drive comprises slightly more open and gently sloping farmland in the area of Norton Mains and Easter Norton. While there would be some visual association with buildings in the Ingliston area, the busy A8 severs this CAA and there is little residential settlement. Housing located both sides of the Norton House Hotel drive could give an impression of 'ribbon development' as coalescence with existing development occurs along the A8. The eastern part of this CAA would also be more visible from the M8. <b>It is concluded that there is some scope for development in this CAA on the field lying to the west of Norton House Hotel and closer to Ratho Station.</b>	Scope for development
Calderwood	4	26 (Overshiel- all) & 27 (Bonnington- small part)	LCA 24 Upper Almond Valley – part. The Upper Almond Valley becomes an incised valley feature from close to where it is crossed by the M8. It is a wide gorge with valley sides of varying steepness along its length, with some areas of pasture and others covered by woodland. The River Almond is quite wide and the horizontally bedded rock outcrops at various points along the river bed are important features. The woodland associated with the valley sides is mixed, and in the vicinity of Clifton Hall School there are influences from the policy woodland. The river is important for recreation and wildlife and there are paths along the riverside. It is also crossed by the spectacular Lin's Mill Aqueduct carrying the Union Canal.	Special Landscape Area (26) / Ancient Woodland (26)	CAA 26 (only minor part) A number of constraints apply to this landscape. Steep slopes also present physical constraints to development. <b>There is no scope for development.</b>	No scope for devt on majority of site
			LCA 25 Bonnington farmland – most. Gentle undulating farmland, more rolling at the transition with the Ratho Hills LCA. The deeply incised Almond valley forms a boundary to the west, while the M8 marks the transition to the urban area of Newbridge to the north. Flat arable fields around Clifton Mains gently rise to a ridge, which appears as an extension of the Ratho Hills to the south. A distinctive dispersed pattern of farmsteads and the grander Bonnington House and Jupiter Artland sculpture park sit atop this ridge. Remnant trees marking former enclosure patterns sit stranded in enlarged fields. The Union Canal is aligned through this area and is fringed in places by woodland and scrub. The containment provided by landform limits extensive views to and from this LCA.	Ancient woodland (27) / Designed Landscape 133 (27)	CAAs 27 and 28 were excluded from the field assessment, due to the presence of constraints, including inclusion in the SLA, a designed landscape and its setting.    CAA 26 lies adjacent to the caravan site but is more open in character. A high voltage transmission line severs the productive farmland on this site. The settlement of East Calder (within West Lothian) is clearly visible to the south-west of this CAA, with some prominent, recently constructed housing, which is not screened by a vegetated edge. Housing sited in this CAA would be physically and perceptually isolated from existing settlement. The openness of the CAA would inhibit the creation of robust edges to new settlement and, although the wooded valley of the Almond provides containment on its northern boundary, <b>there is no scope to accommodate development in this CAA.</b>	
South Riccarton	4	45 (South of Riccarton- all) & 46 (Currievale- all)	LCA 27 Gowan Hill farmland - all most all. A narrow corridor of largely arable farmland lying between the wooded policies of Dalmahoy and the linear settlement of Currie and tapering south of Kaimes Hill towards its western boundary. The area forms a gentle valley, contained to the south by the twin hills of Kaimes and Dalmahoy and a long ridge extending east. A railway and transmission lines are aligned through this landscape. The landscape becomes more fragmented on the urban fringes of Currie and Dalmahoy Hill. Woodland areas on the Riccarton Campus. While this area has high inter-visibility with Currie, it is largely screened from view from key roads and from Edinburgh, due to the containment provided by adjacent landform and woodlands.	Flood Risk Murray Burn (45) / Dalmahoy Inventory site - E part (45) / Core path 16, 17 (45)	CAAs 38, 45 and 46 form a shallow valley, contained by woodland on the edge of Dalmahoy designed landscape and the Riccarton campus and by a ridge to the south where the settlements of Currie and Balerno are located. Woodland and landform provide opportunities to create robust new boundaries to development (Photograph 4A). High voltage transmission lines and a railway line cross this landscape and these features would be likely to constrain development. The Murray Burn flows through this landscape and is traced by some scrub and wetter ground; flood risk is a constraint in the eastern part of the valley floor. Steep slopes occur to the west below Balerno. This landscape comprises productive farmland and some small clustered farms and converted steadings are set on south-facing slopes. These CAAs lie close to Currie and Balerno and, although extensive housing development across this LCA would conflict with the largely linear form of these settlements and would adversely affect the more strongly rural landscape present to the north of the Murray Burn, the area is visually contained. <b>There is scope for development to be accommodated on valley sides with opportunities to create a substantial Green Network and SUDs feature along the Murray Burn as a focus for any development. Off-road cycle and walking routes to Currie and Currie Station would need to be created and consideration should be given to undergrounding transmission lines with the visually discrete Long Dalmahoy area being a preferable site for terminal towers.</b>	Scope for devt but signif impacts

---

**APPENDIX 3 – PEGASUS ENVIRONMENTAL ASSESSMENT SITE PROFORMA**

**Environmental Assessment Criteria / Questions**

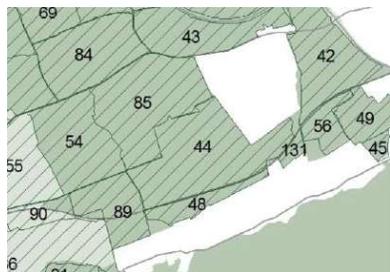
**Example Template**

Council's Assessment	Pegasus scoring
Significant positive effect	Positive (2)
Significant negative effect	Negative (-1)
Uncertain	Unknown (0)
Neutral or no significant effect	Neutral (1)

Site Reference	Site Name	Assessment Scorer	Biodiversity					Population				Soil	Water			Air & Climate				Material Assets		Heritage						Landscape				Total With Weighting Applied						
			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								
Example	Example	Council																																				
		Pegasus																																				

Biodiversity	Population	Soil	Water	Air & Climate	Material Assets	Heritage	Landscape
<p><b>B1:</b> Would site protect and or enhance the integrity of a European and/or National designated biodiversity site?</p> <p><b>B2:</b> Would the site protect and or enhance the integrity of local designated biodiversity sites and wildlife sites?</p> <p><b>B3:</b> Would the site protect and or enhance the integrity of existing habitat networks and other wildlife corridors?</p> <p><b>B4:</b> Would the site protect and or enhance protected species?</p> <p><b>B5:</b> Would the site protect and or enhance ancient woodland?</p>	<p><b>P1:</b> Would the site be located away from regulated site which would increase the population affected by nuisance (odour, noise), poor air quality or regulated major hazard?</p> <p><b>P2:</b> Would the site have an impact on designated quiet areas or noise management areas?</p> <p><b>P3:</b> Would the site provide opportunities for active travel or recreation?</p> <p><b>P4:</b> Would the site provide opportunities for social interaction and inclusion?</p>	<p><b>S1:</b> Would the site be located on brownfield land?</p>	<p><b>W1:</b> Does the site protect and enhance the water status of major water bodies?</p> <p><b>W2:</b> Does the site add to flood risk or reduce flood storage capacity?</p>	<p><b>A1:</b> Does the site provide good accessibility to public transport?</p> <p><b>A2:</b> Does the site provide good accessibility to active travel networks?</p> <p><b>A3:</b> Does the site affect existing AQMAs?</p> <p><b>A4:</b> Does the site prevent increased flooding or instability as a result of climate change?</p>	<p><b>M1:</b> Does the site result in the loss of/have adverse effects on open space?</p> <p><b>M2:</b> Does the site provide access to open space, greenspace/recreational provision?</p>	<p><b>H1:</b> Does the site have significant effects on Listed buildings and their settings?</p> <p><b>H2:</b> Does the site have significant effects on scheduled monuments and their settings?</p> <p><b>H3:</b> Does the site have significant effects on conservation areas?</p> <p><b>H4:</b> Does the site have significant effects on the outstanding value of the World Heritage Sites?</p> <p><b>H5:</b> Does the site have significant effects on Historic Gardens and Designed Landscapes?</p> <p><b>H6:</b> Does the site have significant effects on</p>	<p><b>L1:</b> Does the site have significant effects on the landscape setting of the city or its townscape?</p> <p><b>L2:</b> Does the site enable clear and defensible green belt boundaries to be formed?</p> <p><b>L3:</b> Does the site have significant effects on the designated landscape areas?</p> <p><b>L4:</b> Does the site support the delivery of the green network?</p>

**South Riccarton (Parcel 44) - Environmental Assessment Criteria**

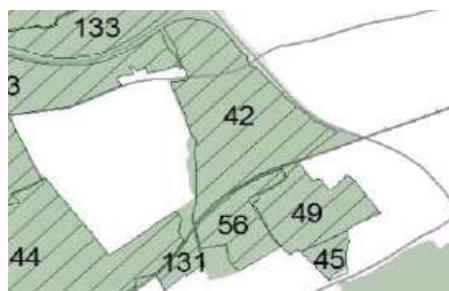


Council's Assessment	Pegasus scoring
Significant positive effect	Positive (2)
Significant negative effect	Negative (-1)
Uncertain	Unknown (0)
Neutral or no significant effect	Neutral (1)

Site Reference	Site Name	Env. Code	Biodiversity					Population				Soil		Water		Air & Climate				Material Assets		Heritage						Landscape				Total With Weighting Applied
			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		
44	South Riccarton	Council Pegasus	Not Assessed																												29	
			1	1	1	1	1	1	1	2	1	-1	0	1	2	2	1	1	1	2	1	1	1	1	0	1	2	1	1	29		

Biodiversity	Population	Soil	Water	Air & Climate	Material Assets	Heritage	Landscape
<p><b>B1:</b> The site could enhance biodiversity if it increased the connectivity of green networks but it isn't located in a designated European and/or national designated site.</p> <p><b>B2:</b> There is a Local Biodiversity Site to the north of the site which can be seen in the map provided in Environment Study, but this is not within the site.</p> <p><b>B3:</b> The site has the potential to protect and enhance existing habitat networks and wildlife corridors through appropriate design. Therefore neutralising the negative effect development may have.</p> <p><b>B4:</b> The site has the potential to protect and enhance protected species which is achievable through appropriate design.</p> <p><b>B5:</b> The site has potential to neutralise the effect of development on ancient woodlands by providing and enhancing existing as there</p>	<p><b>P1:</b> The site is not located in an area of poor air quality and isn't within a noise management area in accordance with the maps provided in the Environment Study.</p> <p><b>P2:</b> The site isn't located within a quiet area or noise management area and therefore has no effect and can be classed as neutral.</p> <p><b>P3:</b> There could be a link provided to the national cycle network via the university campus.</p> <p><b>P4:</b> The site has potential for social interaction and social inclusion facilities to be provided especially due to its location to Heriot Watt University and therefore scores neutrally.</p>	<p><b>S1:</b> The site isn't located on brownfield land but it is unlikely all of Edinburgh's housing need will be met by brownfield.</p>	<p><b>W1:</b> The status of water bodies is unknown.</p> <p><b>W2:</b> The SEPA mapping shows the site adjacent to the park and ride is medium risk of flooding with the land adjacent to Murray Burn being high risk. There are also some areas that are at high risk of surface water flooding, but it is likely that the design can mitigate and reduce the effects.</p>	<p><b>A1:</b> The site is adjacent to Curriehill train station that has frequent services to Edinburgh and Glasgow.</p> <p><b>A2:</b> The site has potential to be integrated and connected to the cycle network.</p> <p><b>A3:</b> The site is not located in a AQMA and therefore has neutral effect the councils assessment noted that greenfield sites are likely to be more detrimental to air quality than brownfield sites but this is not always true as some brownfield sites could promote unsustainable travel.</p> <p><b>A4:</b> The site is susceptible to flooding but this can be mitigated through the design</p>	<p><b>M1:</b> There isn't any designated open space such as public space within the site, it is open countryside.</p> <p><b>M2:</b> The site can enhance and connect to open space.</p>	<p><b>H1:</b> There are some listed buildings within the farmsteads within the site but it is unlikely that the development will have an adverse impact on these.</p> <p><b>H2:</b> There are no scheduled monuments within the site so there is neither a negative or positive effect.</p> <p><b>H3:</b> There is not a conservation area within the site or near to the site so there is neither a negative or positive effect.</p> <p><b>H4:</b> There is not a World Heritage Site within the site or near to the site so there is neither a negative or positive effect.</p> <p><b>H5:</b> There is not a Historic Garden &amp; Designed Landscape within the site or near to the site so there is neither a negative or positive effect.</p> <p><b>H6:</b> Unknown</p>	<p><b>L1:</b>The site does have a significant effect on the landscape but this can be mitigated by careful screening and enhancing the site boundaries</p> <p><b>L2:</b> Parts of the site such as the Burn, the university site wall acts as good boundaries that can be formed.</p> <p><b>L3:</b> No and this is supported by the landscape study saying that development could be well hidden.</p> <p><b>L4:</b> Careful design of the site can contribute to the green network, our point is supported by the Landscape Study which also said it can be hidden well.</p>

**East Riccarton - Environmental Assessment Criteria**

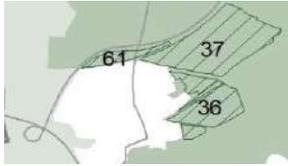


Council's Assessment	Pegasus scoring
Significant positive effect	Positive (2)
Significant negative effect	Negative (-1)
Uncertain	Unknown (0)
Neutral or no significant effect	Neutral (1)

Site Reference	Site Name	Env. Code	Biodiversity					Population				Soil	Water		Air & Climate				Material Assets		Heritage						Landscape				Total With Weighting Applied
			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	
42	East of Riccarton	Council	-	X	?	?	-	-	-	X	?	X	?	?	-	-	?	X	-	Y	X	X	?	-	-	X	-	-	?	-	7
		Pegasus	1	1	1	1	1	1	1	2	1	-1	0	1	2	2	1	1	1	2	1	1	1	1	1	0	1	2	-1	1	27

Biodiversity	Population	Soil	Water	Air & Climate	Material Assets	Heritage	Landscape
<p><b>B1:</b> The site could enhance biodiversity if it increased the connectivity of green networks but it isn't located in a designated European and/or national designated site.</p> <p><b>B2:</b> There is a Local Biodiversity Site to the north of the site which can be seen in the map provided in Environment Study and runs through the northern part of the site but this can be mitigated through design and doesn't impact the whole site.</p> <p><b>B3:</b> The site has the potential to protect and enhance existing habitat networks and wildlife corridors through appropriate design. Therefore neutralising the negative effect development may have.</p> <p><b>B4:</b> The site has the potential to protect and enhance protected species which is achievable through appropriate design.</p> <p><b>B5:</b> The site has potential to neutralise the effect of development on ancient woodlands by providing and enhancing existing.</p>	<p><b>P1:</b> The site is not located in an area of poor air quality and isn't within a noise management area in accordance with the maps provided in the Environment Study.</p> <p><b>P2:</b> The site isn't located within a quiet area or noise management area and therefore has no effect and can be classed as neutral</p> <p><b>P3:</b> The site is adjacent to the National Cycle Network that goes directly into Edinburgh city centre. The Council's assessment notes that there is a city bypass acting as a barrier for active travel. States that the strategy should bring forward new transport and active travel to reduce air pollution.</p> <p><b>P4:</b> The site has potential for social interaction and social inclusion facilities to be provided especially due to its location to Heriot Watt University and therefore scores neutrally.</p>	<p><b>S1:</b> The site isn't located on brownfield land but it is unlikely all of Edinburgh's housing need will be met by brownfield.</p>	<p><b>W1:</b> The status of water bodies is unknown .</p> <p><b>W2:</b> The SEPA mapping shows the site adjacent to the park and ride is medium risk of flooding with the land adjacent to Murray Burn being high risk. There are also some areas that are at high risk of surface water flooding, but it is likely that the design can mitigate and reduce the effects.</p>	<p><b>A1:</b> The site is adjacent to a Park &amp; Ride Facility.</p> <p><b>A2:</b> The site has potential to be integrated and connected to the cycle network.</p> <p><b>A3:</b> The site is not located in a AQMA and therefore has neutral effect the councils assessment noted that greenfield sites are likely to be more detrimental to air quality than brownfield sites but this is not always true as some brownfield sites could promote unsustainable travel.</p> <p><b>A4:</b> The site is susceptible to flooding but this can be mitigated through the design</p>	<p><b>M1:</b> The site is a parcel between two built up areas; Sighthill to the east and Heriot Watt University to the west. The Edinburgh bypass and Riccarton Mains Road act as strong defensible Green Belt boundaries.</p> <p><b>M2:</b> The site can enhance and connect to open space</p>	<p><b>H1:</b> There are a cluster of listed buildings on the site</p> <p><b>H2:</b> There is a scheduled ancient monuments on the site but these could be mitigated in terms of design.</p> <p><b>H3:</b> Hermiston Conservation area is adjacent to the site</p> <p><b>H4:</b> Agree with councils ranking that the site does not have an effect on the outstanding value of the World Heritage Sites.</p> <p><b>H5:</b> Agree with councils ranking that the site does not have significant effects on Historic Gardens and Designed Landscapes.</p> <p><b>H6:</b> The council's assessment states there is a non-designated heritage assets within in but these aren't included in the supplementary maps</p>	<p><b>L1:</b> Agree with council's ranking - that the site does not have a significant effect on the landscape of the city or its townscape.</p> <p><b>L2:</b> There is a bypass and urban built up area to the north east and west that would act as good boundaries. The south leaves the site quite open from the countryside.</p> <p><b>L3:</b> The site is adjacent to a Special Landscape Area so this would need to be taken into account (LCA 29)</p> <p><b>L4:</b> Agree with councils scoring that the site has a neutral effect on the delivery of the green network.</p>

Kirkliston - Environmental Assessment Criteria

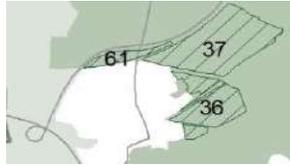


Council's Assessment	Pegasus scoring
Significant positive effect	Positive (2)
Significant negative effect	Negative (-1)
Uncertain	Unknown (0)
Neutral or no significant effect	Neutral (1)

Site Reference	Site Name	Env. Code	Biodiversity			Population			Soil			Water			Air & Climate				Material Assets				Heritage				Landscape				Total With Weighting Applied						
			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							
37	Carlowrie Castle	Council	-	X	7	7	-	X	-	-	7	X	7	7	X	X	7	X	-	-	X	-	-	-	-	X	-	-	-	-	-	-	-	-	-	-	4
			Pegasus	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
34	Craigbrae	Council	-	-	7	7	-	-	-	-	7	X	7	7	X	X	7	X	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	10	
			Pegasus	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
36	Conifox	Council	-	-	7	7	-	-	-	-	7	X	7	7	X	X	7	X	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	13
			Pegasus	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
61	North Kirkliston	Council	-	-	-	-	-	7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	12
			Pegasus	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Composite Score Council																												9.75									
Composite Score Pegasus																												15.75									

Carlowrie Castle	Biodiversity	Population	Soil	Water	Air & Climate	Material Assets	Heritage	Landscape
<b>B1:</b> The site could enhance biodiversity if it increased the connectivity of green networks but isn't located in a designated European and/or national designated site. <b>B2:</b> There is a local biodiversity site to the south of the site but this does not directly impact the site. <b>B3:</b> The site has the potential to protect and enhance existing habitat networks and wildlife corridors through appropriate design. Therefore neutralising the negative effect development may have. <b>B4:</b> The site has the potential to protect and enhance protected species which is achievable through appropriate design. <b>B5:</b> The site has potential to neutralise the effect of development on ancient woodlands by providing and enhancing existing.	<b>P1:</b> Close to the airport, motorway and railway which could have noise issues but the development on the site would be located adjacent next to an existing settlement. <b>P2:</b> The site isn't located within a quiet area or noise management area and therefore has no effect and can be classed as neutral. <b>P3:</b> The site isn't located to the cycle network and this is noted in the council's ES study <b>P4:</b> The site could create a social space as part of the development.	<b>S1:</b> The site isn't located on brownfield land but it is unlikely all of Edinburgh's housing need will be met by brownfield. <b>W1:</b> The status of water bodies is unknown. <b>W2:</b> The site is not within a Flood Risk area there are very small areas that are at high risk of surface water according to the SEPA mapping but these are very minor. Disagree with the council on their rating as unknown. <b>A1:</b> The site does not have good transport links. The council note that the site does not have good links. <b>A2:</b> The site does not have access to the cycle network, active travel routes could be provided within the site but these would need to be connected to the wider network for them to be sustainable and allow people to access locations beyond Kirkliston. The council's study notes that there is no access to the wider cycle network. <b>A3:</b> The site is not located in an AQMA and therefore has neutral effect the council's assessment noted that greenfield sites are likely to be more detrimental to air quality than brownfield sites but this is not always true as some brownfield sites could promote unsustainable travel. <b>A4:</b> The site is not located in a flood zone according to SEPA and Magic Maps. The ES says half the site is within 1 in 200 year flood zone but the flood risk map doesn't show this	<b>M1:</b> The site could provide open space within it but currently the site is being used for agricultural purposes so isn't providing high quality open space that is accessible to the public. <b>M2:</b> There is some recreational space adjacent to the site that development to the west has provided so the site could connect to this and enhance it.	<b>H1:</b> There is a Category B (Almonhill Steading) and Category C (Almonhill Farmhouse) listed building according to Historic Scotland but these can be mitigated against through the design. <b>H2:</b> There are no Scheduled Ancient Monuments on the site. <b>H3:</b> The site is not located within a conservation area. <b>H4:</b> Agree with councils opinion that the site does not have an effect on the outstanding value of the World Heritage Sites. <b>H5:</b> There is a designated Gardens and Designed Landscape (Dundas Castle) to the north of the site beyond the M6 but due to the existing development it is unlikely to have a significant effect on these. <b>H6:</b> The assessment states there is a non-designated heritage assets within the site (Long Cist) but these aren't included in the	<b>L1:</b> Agree with councils ranking - that the site does not have a significant effect on the landscape of the city or its townscape. <b>L2:</b> New GB boundaries would be needed as there are currently no obvious boundaries to the east. The M50 and railway line to the north, Burnshot Road to the south and the development to the west all act as good Green Belt boundaries. <b>L3:</b> There is a Special Landscape Area to the north west beyond the motorway but it is unlikely that development would have a significant effect on this especially given its location to the existing development. <b>L4:</b> Agree with councils scoring that the site has a neutral effect on the delivery of the green			

Kirkliston - Environmental Assessment Criteria



Council's Assessment	Pegasus scoring
Significant positive effect	Positive (2)
Significant negative effect	Negative (-1)
Uncertain	Unknown (0)
Neutral or no significant effect	Neutral (1)

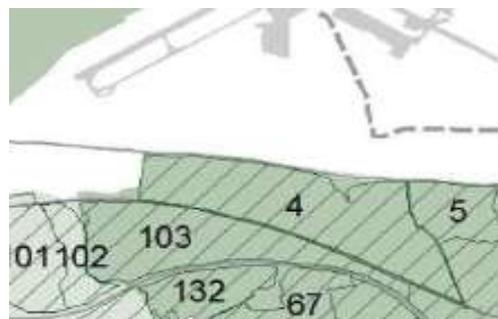
Site Reference	Site Name	Env. Code	Biodiversity		Population			Soil		Water			Air & Climate				Material Assets		Heritage						Landscape				Total With Weighting Applied			
			B1	B2	B3	B4	B5	P1	P2	P3	P4	S1	W1	W2	A1	A2	A3	A4	M1	M2	H1	H2	H3	H4	H5	H6	L1	L2		L3	L4	
37	Carlowrie Castle	Council	-	X	?	?	-	X	-	-	?	X	?	?	?	X	X	?	X	-	-	X	-	-	-	-	X	-	X	-	-	4
			Pegasus	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
34	Craigbrae	Council	-	-	?	?	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	10	
			Pegasus	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
36	Conifox	Council	-	-	?	?	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	13	
			Pegasus	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	10
61	North Kirkliston	Council	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	12	
			Pegasus	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	20
																Composite Score Council						9.75										
																Composite Score Pegasus						15.75										

Craigbrae	Biodiversity	Population	Soil	Water	Air & Climate	Material Assets	Heritage	Landscape
<p><b>B1:</b> The site could enhance biodiversity if it increased the connectivity of green networks but it isn't located in a designated European and/or national designated site.</p> <p><b>B2:</b> There is a local biodiversity site to the south of the site but this does not directly impact the site.</p> <p><b>B3:</b> The site has the potential to protect and enhance existing habitat networks and wildlife corridors through appropriate design.</p> <p>Therefore neutralising the negative effect development may have.</p> <p><b>B4:</b> The site has the potential to protect and enhance protected species which is achievable through appropriate design.</p> <p><b>B5:</b> The site has potential to neutralise the effect of development on ancient woodlands by providing</p>	<p><b>P1:</b> Close by to the airport, motorway and railway which could have noise issues but the development on the site would be located adjacent next to an existing settlement.</p> <p><b>P2:</b> The site isn't located within a quiet area or noise management area and therefore has no effect and can be classed as neutral</p> <p><b>P3:</b> The site isn't located to the cycle network and this is noted in the council's ES study</p> <p><b>P4:</b> The site could create a social space as part of the development.</p>	<p><b>S1:</b> The site isn't located on brownfield land but it is unlikely all of Edinburgh's housing need will be met by brownfield.</p>	<p><b>W1:</b> The status of water bodies is unknown.</p> <p><b>W2:</b> The site is not within a Flood Risk area but it is adjacent to a high risk river flooding area.</p>	<p><b>A1:</b> The sites does not have good transport links.</p> <p><b>A2:</b> The site does not have access to the cycle network, active travel routes could be provided within the site but these would need to be connected to the wider network for them to be sustainable and allow people to access locations beyond Kirkliston.</p> <p><b>A3:</b> The site is not located in a AQMA and therefore has neutral effect the councils assessment noted that greenfield sites are likely to be more detrimental to air quality than brownfield sites but this is not always true as some brownfield sites could promote unsustainable travel.</p> <p><b>A4:</b> The site is not located in a flood zone.</p>	<p><b>M1:</b> The site could provide open space within it but currently the site is being used for agricultural purposes so isn't providing high quality open space that is accessible to the public.</p> <p><b>M2:</b> The site can enhance and connect to open space.</p>	<p><b>H1:</b> There is not a significant effect on listed buildings as there is none on the site.</p> <p><b>H2:</b> There are no Scheduled Ancient Monuments on the site.</p> <p><b>H3:</b> The site is not located within a conservation area.</p> <p><b>H4:</b> Agree with councils ranking that the site does not have an effect on the World Heritage Sites.</p> <p><b>H5:</b> Agree with councils ranking that the site does not have significant effects on Historic Gardens and Designed Landscapes.</p> <p><b>H6:</b> There are no maps showing non-designated heritage assets.</p>	<p><b>L1:</b> Agree with councils ranking - that the site does not have a significant effect on the landscape of the city or its townscapes.</p> <p><b>L2:</b> The site is contained by the surrounding roads but the site could sprawl to the east.</p> <p><b>L3:</b> There are no designated landscape areas close to the site</p> <p><b>L4:</b> Agree with councils scoring that the site has a neutral effect on the delivery of the green network.</p>	





**West Edinburgh - Environmental Assessment Criteria**



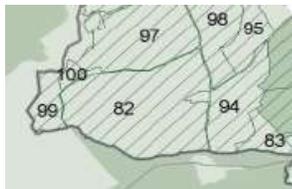
Council's Assessment	Pegasus scoring
Significant positive effect	Positive (2)
Significant negative effect	Negative (-1)
Uncertain	Unknown (0)
Neutral or no significant effect	Neutral (1)

Site Reference	Site Name	Env. Code	Biodiversity		Population				Soil	Water			Air & Climate				Material Assets		Heritage						Landscape				Total With Weighting Applied		
			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
4	Norton Park	Council	-	-	?	?	?	-	-	X	-	X	?	?	-	-	?	X	-	-	X	X	-	-	-	-	-	-	?	-	11
		Pegasus	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	2	1	1	1	1	1	1	1	1	1	1	18	

Biodiversity	Population	Soil	Water	Air & Climate	Material Assets	Heritage	Landscape
<p><b>B1:</b> The site could enhance biodiversity if it increased the connectivity of green networks but it isn't located in a designated European and/or national designated site.</p> <p><b>B2:</b> There is a local biodiversity site to the east of the site but this does not directly impact the site.</p> <p><b>B3:</b> The site has the potential to protect and enhance existing habitat networks and wildlife corridors through appropriate design. Therefore neutralising the negative effect development may have.</p> <p><b>B4:</b> The site has the potential to protect and enhance protected species which is achievable through appropriate design.</p> <p><b>B5:</b> There is an ancient woodland adjacent to the site but the development is unlikely to have a negative effect on this.</p>	<p><b>P1:</b> The site is close by to the airport, railway and Glasgow Road (A8) but it is unlikely that this will have a negative effect on the area.</p> <p><b>P2:</b> The site isn't located within a quiet area or noise management area and therefore has no effect and can be classed as neutral.</p> <p><b>P3:</b> The site can be accessed from Glasgow Road that has walking paths alongside it, despite it being a busy road. The ES states it is adjacent to the National Cycle Network but then scores this negatively.</p> <p><b>P4:</b> The site could create a social space as part of the development.</p>	<p><b>S1:</b> The site isn't located on brownfield land but it is unlikely all of Edinburgh's housing need will be met by brownfield.</p>	<p><b>W1:</b> The status of water bodies is unknown .</p> <p><b>W2:</b> The site has some small areas that are at high risk of surface water flooding on the SEPA mapping. The ES states that the site is in a 1 in 200 risk of flooding.</p>	<p><b>A1:</b> The tram station is over a 20 minute walk and the walk has some physical boundaries and isn't a pleasant walk under an underpass. There are two bus stops in close proximity to the site that provide regular services to Edinburgh.</p> <p><b>A2:</b> The site isn't in close proximity to the NCN there is a small footpath on the site of Glasgow Road but this wouldn't be sufficient there is plans for a QuietRoute proposal but this hasn't gone ahead as of yet.</p> <p><b>A3:</b> Using the councils environment study maps, the site is located next to an air quality management area. The affect of development on these areas is uncertain.</p> <p><b>A4:</b> The site has some small areas that are at high risk of surface water flooding on the SEPA mapping.</p>	<p><b>M1:</b> The site could provide open space within it but currently the site is being used for agricultural purposes so isn't providing high quality open space that is accessible to the public.</p> <p><b>M2:</b> There is public open space to the west of the development that could be connected to the site.</p>	<p><b>H1:</b> There are some listed buildings within the site e.g. Norton House Hotel (Category C), 6,8,11,12 Glasgow Road (Category C) and two Category C at Norton Mains in the south east of the site.</p> <p><b>H2:</b> There is a Standing Stone within the eastern part of the site and is classed as a Scheduled Monument.</p> <p><b>H3:</b> The site is not located within a conservation area.</p> <p><b>H4:</b> Agree with councils ranking that the site does not have an effect on the outstanding value of the World Heritage Sites.</p> <p><b>H5:</b> There is a historic garden and designed landscape to the east of the site at Milburn Tower but this is 1.3km from the site so it is likely to be unaffected by the development.</p> <p><b>H6:</b> Unknown if there are</p>	<p><b>L1:</b> Agree with council - the site doesn't contribute to the landscape setting.</p> <p><b>L2:</b> The site can be contained by Glasgow Road, the railway line but going to the west this could merge Ratho with Sighthill if it keeps sprawling towards the east, especially given the prospectus development at East Milburn Tower.</p> <p><b>L3:</b> There is a SLA adjacent to the site and developing the site may be detrimental to this.</p> <p><b>L4:</b> Potential link to the golf course.</p>



Calderwood - Environmental Assessment Criteria



Council's Assessment	Pegasus scoring
Significant positive effect	Positive (2)
Significant negative effect	Negative (-1)
Uncertain	Unknown (0)
Neutral or no significant effect	Neutral (1)

Site Reference	Site Name	Env. Code	Biodiversity			Population			Soil			Water			Air & Climate			Material Assets			Heritage			Landscape			Total With Weighting Applied				
			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
99	Overshield	Council	-	?	?	-	?	-	-	-	-	X	-	-	X	X	?	X	-	X	?	-	-	-	-	X	-	-	X	-	9
		Pegasus	1	-1	1	1	-1	1	1	-1	1	-1	0	1	-1	-1	-1	1	1	1	1	1	1	1	1	0	1	-1	1	1	12
82	Bonnington	Council	-	-	?	?	?	X	-	X	-	X	?	?	X	X	?	X	-	X	X	-	-	-	-	-	X	X	-	2	
		Pegasus	1	1	1	1	-1	1	1	-1	1	-1	0	1	-1	-1	1	1	1	1	1	1	1	1	1	0	1	-1	-1	1	12
Composite Score Council																											5.5				
Composite Score Pegasus																											12				

Bonnington	Biodiversity	Population	Soil	Water	Air & Climate	Material Assets	Heritage	Landscape
<p><b>B1:</b> The site could enhance biodiversity if it increased the connectivity of green networks but it isn't located in a designated European and/or national designated site.</p> <p><b>B2:</b> There is a local biodiversity site to the north east of the site but this does not directly impact the site.</p> <p><b>B3:</b> The site has the potential to protect and enhance existing habitat networks and wildlife corridors through appropriate design. Therefore neutralising the negative effect development may have.</p> <p><b>B4:</b> The site has the potential to protect and enhance protected species which is achievable through appropriate design.</p> <p><b>B5:</b> There is an ancient woodland within the site.</p>	<p><b>P1:</b> The site being located away from public transport will effect the air quality by increasing the number of car trips but it is not in an area that has poor air/ noise quality.</p> <p><b>P2:</b> The site isn't located within a quiet area or noise management area and therefore has no effect and can be classed as neutral.</p> <p><b>P3:</b> The site isn't connected to the cycle network. The adjacent development may provide opportunities for recreation.</p> <p><b>P4:</b> The site could create a social space as part of the development.</p>	<p><b>S1:</b> The site isn't located on brownfield land but it is unlikely all of Edinburgh's housing need will be met by brownfield.</p>	<p><b>W1:</b> The status of water bodies is unknown .</p> <p><b>W2:</b> The SEPA map shows that parts of the site are at risk of surface water flooding but these are not large areas.</p>	<p><b>A1:</b> Kirknewton Train Station is located over a 40 minute walk from the site and there is a bus stop 30 minutes from the site.</p> <p><b>A2:</b> There isn't a cycle network close to the site and there are no facilities that are in close walking distance to the site.</p> <p><b>A3:</b> The site is not located in a AQMA and therefore has neutral effect the council's assessment noted that greenfield sites are likely to be more detrimental to air quality than brownfield sites but this is not always true as some brownfield sites could promote unsustainable travel.</p> <p><b>A4:</b> The SEPA map shows that parts of the site are at risk of surface water flooding but these are not large areas.</p>	<p><b>M1:</b> The site could provide open space within it but currently the site is being used for agricultural purposes so isn't providing high quality open space that is accessible to the public.</p> <p><b>M2:</b> The site has potential to include open space but connections to existing are not available due to the lack of provision.</p>	<p><b>H1:</b> There are 3 Category A (which is the highest listed) listed buildings within the site (Bonnington Dovecote, Bonnington House, Bonnington Sundial).</p> <p><b>H2:</b> There are no Scheduled Ancient Monuments on the site.</p> <p><b>H3:</b> The site is not located within a conservation area.</p> <p><b>H4:</b> Agree with councils ranking that the site does not have an effect on the outstanding value of the World Heritage Sites.</p> <p><b>H5:</b> Agree with councils ranking that the site does not have significant effects on Historic Gardens and Designed Landscapes.</p> <p><b>H6:</b> Unknown if there are any non-designated heritage assets.</p>	<p><b>L1:</b> Agree with council - the site doesn't contribute to the landscape setting.</p> <p><b>L2:</b> The site isn't very well contained by Green belt boundaries.</p> <p><b>L3:</b> There is a SLA that is partially in the eastern part of the site adjacent to the site.</p> <p><b>L4:</b> Potential links to the open countryside that the site is situated in.</p>	

**Crosswinds - Environmental Assessment Criteria**



Council's Assessment	Pegasus scoring
Significant positive effect (Y)	Positive (2)
Significant negative effect (X)	Negative (-1)
Uncertain (?)	Unknown (0)
Neutral or no significant effect (-)	Neutral (1)

Site Reference	Site Name	Env. Code	Biodiversity		Population				Soil	Water		Air & Climate				Material Assets		Heritage						Landscape				Total With Weighting Applied				
			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		
406	Crosswinds	Council	-	?	-	-	-	-	-	-	?	Y	?	?	X	-	-	X	-	-	?	-	-	-	-	-	X	-	-	-	-	18
		Pegasus	1	1	1	1	1	-1	1	2	1	2	0	1	2	2	1	1	1	1	1	1	1	1	1	0	1	1	1	1	28	

Biodiversity	Population	Soil	Water	Air & Climate	Material Assets	Heritage	Landscape
<p><b>B1:</b> The site could enhance biodiversity if it increased the connectivity of green networks but it isn't located in a designated European and/or national designated site.</p> <p><b>B2:</b> The site is not located within or near to a local designated site.</p> <p><b>B3:</b> The site has the potential to protect and enhance existing habitat networks and wildlife corridors through appropriate design. Therefore neutralising the negative effect development may have.</p> <p><b>B4:</b> The site has the potential to protect and enhance protected species which is achievable through appropriate design.</p> <p><b>B5:</b> There isn't an ancient woodland within the site.</p>	<p><b>P1:</b> The site is located directly next to the airport which would be noisy and disruptive for future residents.</p> <p><b>P2:</b> The site isn't located within a quiet area or noise management area and therefore has no effect and can be classed as neutral.</p> <p><b>P3:</b> The site isn't located on a national cycle route but there is a footpath along Glasgow Road, but there are no cycle paths along the road. However, there are local facilities than can be accessed via walking.</p> <p><b>P4:</b> The site could create a social space as part of the development.</p>	<p><b>S1:</b> The site is located on brownfield land and this should be supported, however it may not be as sustainable as some of the greenfield sites in terms of local facilities.</p>	<p><b>W1:</b> The status of water bodies is unknown .</p> <p><b>W2:</b> Part of the site is in a river high risk flooding area, but this could be mitigated through design.</p>	<p><b>A1:</b> The site is adjacent to Edinburgh Gateway station, tram station and bus stops which provide regular services to Edinburgh centre and the surrounding area. Unsure why the council has rated this as negative.</p> <p><b>A2:</b> The site isn't located on a national cycle route but there is a footpath along Glasgow Road, but there are no cycle paths along the road but local facilities can be easily accessed via walking.</p> <p><b>A3:</b> The site is not located in a AQMA area, according to the council's environment study map provided.</p> <p><b>A4:</b> Part of the site is in a river high risk flooding area, but this could be mitigated through design.</p>	<p><b>M1:</b> The site could provide open space within it and the site is brownfield so it would improve open space.</p> <p><b>M2:</b> There isn't a large amount of open space to provide access therefore the effect is neutral.</p>	<p><b>H1:</b> There area 2 Category A buildings (Castle Gogar) and a Category B (Castle Gogary Bridge) adjacent to the site so these would need to be carefully mitigated.</p> <p><b>H2:</b> There are no Scheduled Ancient Monuments on the site.</p> <p><b>H3:</b> The site is not located within a conservation area.</p> <p><b>H4:</b> Agree with councils ranking that the site does not have an effect on the outstanding value of the World Heritage Sites.</p> <p><b>H5:</b> Agree with councils ranking that the site does not have significant effects on Historic Gardens and Designed Landscapes.</p> <p><b>H6:</b> Unknown if there are</p>	<p><b>L1:</b> Disagree with the council as the site does not contribute to the landscape setting.</p> <p><b>L2:</b> n/a as the site is not within the Green Belt</p> <p><b>L3:</b> There is a SLA on the opposite side of Glasgow Road so this would have to be carefully mitigated but development in this area is unlikely to be harmful.</p> <p><b>L4:</b> Potential links to the surrounding area which is partially rural and urban.</p>

**EDINBURGH CHOICES FOR CITY PLAN - ENVIRONMENTAL ASSESSMENT SUMMARY TABLE (COUNCIL AND PEGASUS GROUP SITE ASSESSMENTS)**

Site Name	Env. Code	Biodiversity					Population				Soil	Water		Air & Climate				Material Assets		Heritage						Landscape				Site Score	Collated Council	Collated Pegasus
		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			
South Riccarton	Council	Not Assessed					N/A				N/A	N/A		N/A				N/A		N/A						N/A				N/A	N/A	29
	Pegasus	1	1	1	1	1	1	1	2	1	-1	0	1	2	2	1	1	1	2	1	1	1	1	1	0	1	2	1	1	29	N/A	29
East of Riccarton	Council	-	X	?	?	-	-	-	X	?	X	?	?	-	-	?	X	-	Y	X	X	?	-	-	X	-	-	?	-	7	7	27
	Pegasus	1	1	1	1	1	1	1	2	1	-1	0	1	2	2	1	1	1	2	1	1	1	1	1	0	1	2	-1	1	27	7	27
Carlowrie Castle (Kirkliston)	Council	-	X	?	?	-	X	-	-	?	X	?	?	X	X	?	X	-	-	X	-	-	-	-	X	-	X	-	-	4	9.75	15.75
	Pegasus	1	1	1	1	1	1	1	-1	1	-1	0	1	-1	-1	1	1	1	2	1	1	1	1	1	0	1	1	1	1	19		
Craigbrae (Kirkliston)	Council	-	-	-	?	-	X	-	-	-	X	-	-	X	X	?	X	-	-	X	-	-	-	-	X	-	X	-	-	10		
	Pegasus	1	-1	1	1	1	-1	1	-1	1	-1	0	1	-1	-1	1	1	1	1	1	1	1	1	1	0	1	1	1	1	14		
Conifox (Kirkliston)	Council	-	-	-	?	-	-	-	-	?	X	?	?	X	X	?	X	-	-	X	-	-	-	-	-	-	-	-	-	13		
	Pegasus	1	-1	1	1	1	-1	1	-1	1	-1	0	-1	-1	-1	1	-1	1	1	1	1	1	1	1	0	1	1	1	1	10		
North Kirkliston (Kirkliston)	Council	-	-	-	-	-	?	-	X	X	X	-	-	X	-	?	X	-	X	-	-	-	-	-	X	-	-	-	-	12		
	Pegasus	1	1	1	1	1	1	1	-1	1	-1	0	1	-1	-1	1	1	1	2	1	1	1	1	1	0	1	2	1	1	20		
Norton Park (West Edinburgh)	Council	-	-	?	?	?	-	-	X	-	X	?	?	-	-	?	X	-	-	X	X	-	-	-	-	-	-	?	-	11		
	Pegasus	1	1	1	1	1	1	1	1	1	-1	0	1	1	-1	0	1	1	2	1	-1	1	1	1	0	1	1	-1	1	18		
Overshiel (Calderwood)	Council	-	?	?	-	?	-	-	-	-	X	-	-	X	X	?	X	-	X	?	-	-	-	-	X	-	-	X	-	9		
	Pegasus	1	-1	1	1	-1	1	1	-1	1	-1	0	1	-1	-1	1	1	1	1	1	1	1	1	1	0	1	-1	1	1	12		
Bonnington (Calderwood)	Council	-	-	?	?	?	X	-	X	-	X	?	?	X	X	?	X	-	X	X	-	-	-	-	-	-	X	X	-	2		
	Pegasus	1	1	1	1	-1	1	1	-1	1	-1	0	1	-1	-1	1	1	1	1	1	1	1	1	1	0	1	-1	-1	1	12		
Crosswinds	Council	-	?	-	-	-	-	-	-	?	Y	?	?	X	-	-	X	-	-	?	-	-	-	-	-	X	-	-	-	18		
	Pegasus	1	1	1	1	1	-1	1	2	1	2	0	1	2	2	1	1	1	1	1	1	1	1	1	0	1	1	1	1	28		

Council's Assessment	Pegasus scoring
Significant positive effect (Y)	Positive (2)
Significant negative effect (X)	Negative (-1)
Uncertain (?)	Unknown (0)
Neutral / No significant effect (-)	Neutral (1)

---

**APPENDIX 4 – GOVERNMENT REPORT – EDUCATION DEVELOPER CONTRIBUTIONS**



The Chief Planner  
Scottish Government

I refer to your letter of 29 November 2018 to the Interim Chief Reporter requesting a report from the Directorate of Planning and Environmental Appeals on the City of Edinburgh Council's intention to adopt its Supplementary Guidance on Developer Contributions and Infrastructure Delivery. My report is attached.

You [wrote separately to the council](#) to inform them of the preparation of this report. You stated in that letter that the reporter will be responsible for deciding whether any additional information and evidence is required to prepare the report.

Your officials provided me with the package of information provided by the council when it informed you by email on 7 September 2018 of its intention to adopt the supplementary guidance. This included:

- the version of the supplementary guidance which the council intends to adopt
- a summary of the representations received on the consultation draft and of the council's response to these
- a list of changes between the consultation and final drafts of the supplementary guidance, and
- a statement of conformity with the tests for planning obligations which are set out in Circular 3/2012: Planning Obligations and Good Neighbour Agreements.

The council's email also contained links to its appraisals on transport, education and primary care infrastructure which have informed the supplementary guidance, and to the action programme for the local development plan.

I have had regard to all of the above information in preparing my report. In addition to these materials I have also had reference to other evidence in the public domain such as the local development plan itself, its examination report, relevant legislation, Scottish Planning Policy and government circulars – I refer to these in the report as appropriate. Your officials sent me a number of other emails they have received by various parties (all or most of whom made representations on the consultation draft) about the supplementary guidance. However, these do not appear to raise any significant new issues which are not already raised in the consultation responses summarised by the council. In any event, I have taken no account of this additional correspondence in preparing my report. I have not had regard to the various appeal decisions which are referred to by some respondents and by the council, since these relate to the circumstances of individual planning applications rather than to the process of preparing the supplementary guidance itself.

I decided not to seek any further submissions from the council or those who made representations during the consultation process, although this would remain an option

should Ministers wish further evidence before deciding how to respond to the council's notification. This is because the material I have read is in my view sufficient to allow me to report back on the three specific matters you asked for the report to address. There are certain issues on which I cannot give a definitive and well-informed view, but that would likely still have been the case unless I sought very detailed additional evidence from parties. I do not think each and every issue raised in representations need be fully answered in order for me to respond in a proportionate manner to your request.

You requested that my report set out the following:

1. The consultation undertaken to date, and the way that views have been taken into account by the City of Edinburgh Council.
2. The methodology used to calculate contributions for education infrastructure.
3. Compliance of the supplementary guidance with Circular 3/2012.

In respect of the first element, I am aware that there has been more than one consultation draft of the supplementary guidance. But I restrict myself to the consultation on the most recent draft, as that is what the council's summary of the consultation responses relates to. In covering both the first and the third elements, I am required to look further than into the methodology for education contributions and to consider also, in particular, the approach in the guidance to both transport and healthcare contributions.

I have found it easiest to structure my report by considering generic, cross-cutting issues first and then considering the approach in the guidance to education, transport and healthcare contributions in turn. I return at the end to conclude on the 3 elements you ask me to consider. I do not address each of the representations one by one, but rather focus on what seem to me to be the main issues raised by the consultation process and by the approaches adopted in the supplementary guidance. The sub-headings in each chapter are based largely on the main issues raised in the consultation responses. For ease of reference, I have appended your letter to the end of my report.

*David Liddell*  
Principal Reporter

29 January 2019

<b>CONTENTS</b>	<b>PAGE</b>
<b>1 GENERAL AND CROSS-CUTTING ISSUES</b>	<b>4</b>
Does the level of contributions undermine development viability?	4
Should the guidance mention other funding sources?	4
The council's role – carrying risk for infrastructure provision	4
Is more infrastructure needed to make up housing shortfall?	6
Dealing with windfall development	6
Can the council re-assign contributions to a different infrastructure intervention?	8
Is the content of the guidance sufficiently grounded in the local development plan?	8
Does/should the guidance provide certainty about the contributions expected from sites?	14
Amending the zones, actions and contributions in the guidance	18
Section 75 agreements must restrict or regulate the development or use of land	18
Format and clarity of the supplementary guidance	18
<b>2 EDUCATION CONTRIBUTIONS</b>	<b>19</b>
The evidence for the need for contributions	19
The justification for the approach in each zone	21
Should contributions be levied only for the catchment school(s) for a development?	22
Should school capacity be 'first come first serve'?	22
Assumptions about travel to school thresholds	22
Land and development costs for new schools	23
Pupil Generation Rates	23
Retaining contributions for 30 years	24
7.5% contingency costs	24
<b>3 TRANSPORT CONTRIBUTIONS</b>	<b>25</b>
The evidence base	25
Which categories of development are covered by the cumulative contribution zones?	32
Cumulative assessment in transport appraisals	32
Exemptions from making contributions	32
Trams	32
<b>4 HEALTHCARE CONTRIBUTIONS</b>	<b>34</b>
The principle of developer contributions for healthcare infrastructure	34
The evidence base	34
Catchment areas	37
Costs	37
Developer contributions for private businesses/practices	38
<b>5 CONCLUSIONS</b>	<b>39</b>

# **1 GENERAL AND CROSS-CUTTING ISSUES**

## **Does the level of contributions undermine development viability?**

1.1 Several respondents to the consultation raise this issue, both about this supplementary guidance but also more generally across Scotland. The difficulties in raising capital, combined with the size of contributions required, are said to threaten viability. Forth Ports states that the contributions sought in the guidance would render any further development of its land at Western Harbour, beyond the extant permission, unviable.

1.2 I return below to the justification for the level of contributions for education, transport and healthcare infrastructure. But as to whether what is being sought, for any particular development or for development more generally, would threaten its viability, I do not have before me the kind of detailed financial information that would demonstrate this. I do note, however, that section 3 of the guidance deals with viability and funding mechanisms and provides for the possibility of contributions being varied or even waived where there are abnormally high site preparation costs which threaten the viability of a development.

1.3 It is also stated that the costs of some items have increased during the time it has taken to progress the supplementary guidance to this point, and that it is unfair that developers should have to meet these increased costs. However, as the council points out, contributions for new infrastructure would naturally need to be based on the relevant costs at the time and costs in the guidance would anyway be subject to future inflation and (perhaps) revision. I do not find that any delay in adopting the guidance provides a strong reason for departing, now, from the principal of basing contributions on up to date assessments of costs.

## **Should the guidance mention other funding sources?**

1.4 Alternative sources of funds, such as the City Deal, are referred to by some respondents. It is argued that the guidance should highlight these, setting out when they can be utilised and ensuring developer contributions are therefore only sought when necessary. Section 3 of the guidance refers to the possibility of gap or forward funding being available in the event of viability concerns, and also that such funding may be required to deliver infrastructure projects in the action programme. The council says that, given the uncertainty in City Deal and other funding sources, it would be inappropriate to provide further detail in the supplementary guidance.

1.5 I do not think it is essential for the guidance to rehearse the circumstances where some other potential, currently unconfirmed, source of funding might reduce or remove the need for a contribution. Nor is the guidance the place to set out how and where money from other funding streams (like the City Deal), which would be subject to separate governance regimes, ought to be spent.

## **The council's role – carrying risk for infrastructure provision**

1.6 However I think it would have been open to the council to provide some further information in the guidance about alternative sources of funding – albeit these may be subject to change. It is noted by several respondents that the council gave a commitment during a hearing session of the local development plan examination that infrastructure

constraints would not be allowed to delay development. In allowing the plan to be adopted, the Minister wrote

'In part, I am reassured by the published statement that: "At the hearing the Council explained that it would carry the risk of the required infrastructure provision and this would not delay development" (Examination Report page 146 paragraph 96). I expect to see this assurance carried through to future decision making.'

1.7 Respondents want the guidance to re-affirm this commitment, confirming that the council will carry the risk of the required infrastructure provision so that development would not be delayed. The statement in the guidance that development should only progress subject to sufficient infrastructure being available/to be delivered is said to be contrary to such a commitment, as is the approach to the timing/phasing of education provision. There are also requests that the council should commit to front-funding infrastructure and then recoup the costs from developer contributions.

1.8 It is worth at this point noting some of the relevant content from the local development plan itself. Paragraph 103 explains that developer contributions are sought to enable the delivery of infrastructure at the appropriate time. Policy Del 1 says that 'development should only progress subject to sufficient infrastructure already being available or where it is demonstrated that it can be delivered at the appropriate time.'

1.9 The supplementary guidance repeats the above statement. When it comes to education provision, paragraph E of the guidance says that development should only progress where it is demonstrated that required education infrastructure can be delivered at the appropriate time. Paragraph F says that conditions may be used to phase development in line with the provision of new infrastructure. These statements seem to me to be entirely consistent with the principle established in the extract from policy Del 1 which I quote above.

1.10 However, paragraph 105 of the local development plan highlights the need for developer contributions to be realistic so that they do not impede development, stresses the importance of increasing the rate of new house completions, and says that mechanisms for forward and gap funding may also have to be considered. The following paragraph in the plan goes on to say that the supplementary guidance is to 'address the detail of these matters'. Policy Del 1 itself says that the guidance is, amongst other things, to provide guidance on the approach to the timely delivery of the required infrastructure and of the council's approach should the required contributions raise demonstrable viability concerns and/or where forward or gap funding may be required. Paragraph 143 of the local development plan says that the supplementary guidance will include 'possible approaches to forward and gap funding'. I am also mindful of the council's commitment (as relayed in the examination report) and of that reporter's expectation (page 763, paragraph 37) that the supplementary guidance would provide further clarity and detail in relation to the need for forward and gap funding.

1.11 In this context, I can well understand why there is disappointment from some respondents that the supplementary guidance does not provide more detail about how the council will aim to ensure that the provision of infrastructure will not unduly delay the progress of development. Section 3 does, as I note above, acknowledge that funding gaps may occur, but it does not say what would, could or may be done in response. It does not explain what the council's quoted commitment that 'it would carry the risk of the required

infrastructure provision and this would not delay development' would mean in practice. In this respect, my view is that the supplementary guidance falls short of what would reasonably have been expected on the basis of the contents of the local development plan (in particular policy Del 1) and the examination report. In responding to one representation, the council refers to £35m of potential capital funding for action programme projects to be used to front fund infrastructure in advance of the collection of developer contributions, yet there is no mention of this (or of how such an approach would work) in the supplementary guidance itself.

### **Is more infrastructure needed to make up housing shortfall?**

1.12 Conversely to arguing that too much is being sought through developer contributions, some development interests have also argued that the council's assessments of infrastructure requirements do not take into account the full extent of new infrastructure needed to make up the shortfall in housing completions. The concern is that further development (on unallocated sites) will now be rejected on the basis that there is no infrastructure to support them, it all being required for the allocated sites.

1.13 In responding, the council says that the infrastructure identified in the action programme is sufficient to support delivery of all the sites in the adopted local development plan, all other sites in the established housing land supply and other urban land with potential for housing development. I do not have information on the current position of the effective housing land supply. But regardless of that, I am not convinced it would be necessary for the supplementary guidance to plan for infrastructure provision to support development on (unidentified) sites beyond those categories the council has listed. To do so would seem to be at odds with a plan-led system, and it is not clear to me how it could be done effectively without knowing which sites to incorporate. Policy Hou 1 of the local development plan provides the basis for considering the infrastructure requirements for housing proposals on unallocated sites, pointing to the need to consider policies Del 1 (and its supplementary guidance) and Tra 8. For education infrastructure at least, paragraph C(ii) in part 2a of the supplementary guidance covers the arrangements for other sites not in the established supply. I do note, however, that some of the transport contribution zones for South East Edinburgh do seem to allow for the possibility of further greenfield releases there, on sites identified in the transport appraisal addendum as being amongst those which might come forward as further development proposals.

### **Dealing with windfall development**

1.14 Related to the issue above, questions are raised about how windfall sites (or increases in the capacity of allocated sites) would affect the arrangements for developer contributions. So, for example, if a number of sites in a zone are together to pay for an infrastructure intervention (like a school extension), what is the impact on these arrangements of a wholly new site being given planning permission within the same zone? Could these arrangements, as set out in the guidance, need to change as a result of a nearby windfall site gaining permission? One respondent suggested that windfall sites should be treated on a standalone basis rather than being required to make the contributions set out in the guidance.

1.15 The council responds by referring to paragraph C of part 2a of the guidance (the part dealing with education contributions). This says that if the education infrastructure interventions identified in the current action programme are sufficient to accommodate the

increase in pupil numbers, then the established 'per house' and 'per flat' rates would be applied to non-allocated sites. However if the identified infrastructure interventions would not be sufficient, then the council would consider whether these (and the associated contribution zones) need to be revised. If the established contribution rates would not cover the cost of the revised interventions, the developer of the new site would need to make up the difference.

1.16 The council also points to an intention to review the action programme on an annual basis, giving an opportunity to revise the infrastructure interventions and the associated costs (a point I return to below).

1.17 As I note above, the interventions and contributions in the guidance are based on assumed numbers of houses from allocated sites, sites in the housing land audit and other urban land considered to have capacity for development. Therefore the question is about how 'other' sites (greenfield sites or perhaps other urban sites not accounted for, or increases in the capacity of allocated sites) would be treated.

1.18 Assumptions about the rate of new housing development, the capacity of sites and future school rolls are, of course, subject to uncertainty and future change. An approach which seeks to set out a set of infrastructure interventions and mechanisms for developer contributions based on such assumptions needs to recognise that. Even without new sites, this is not an exact science, and there must be an expectation from all parties that some variation can be tolerated without revisiting the interventions and/or contributions. So it seems reasonable for the guidance to take the position that, unless it is necessary to make new arrangements, new sites and variations in site capacity can proceed on the basis of established interventions and contributions.

1.19 But what happens when revisions to interventions and contributions would be required as a result of a windfall development? The guidance puts the additional costs (if there are any) of any new arrangements for education infrastructure on the windfall development, so there should be no additional costs for the established sites. Therefore I assume (to be consistent with that approach) that it is not the intention that any new contribution zone or sub-area would apply to already established sites. The guidance does not clearly set this out however.

1.20 It is not stated, but I presume that the council would want to ensure that, when new arrangements are required, this does not cause any significant delay to the progress of established sites.

1.21 A question is raised as to whether, if a windfall development comes along and makes a contribution to, say, a school extension already identified in the guidance, the contributions from the established developments can be reduced accordingly. The guidance says (in part 4) that section 75 agreements can make provision for the repayment of unused contributions, and this would seem applicable to this kind of circumstance.

## **Can the council re-assign contributions to a different infrastructure intervention?**

1.22 At part 4 of the guidance it is stated that:

‘Whilst contributions may be required towards the delivery of a number of actions within a Zone, the Council may apportion money received from a particular development site to the delivery of infrastructure actions that have been prioritised in order to support early phases of development. Remaining or future moneys will then be used for the delivery of other actions set out within the Action Programme.’

1.23 So, for example, a hypothetical development may need to contribute, under the terms of the guidance, towards the costs of a primary school extension, a secondary school extension, a GP surgery and a junction improvement. My reading of the above extract is that where, say, the junction improvement is the most pressing intervention to allow development to proceed, all of the contribution from that development could be put towards it. Later developments in the same contribution zones would then make the contributions towards the other, less pressing interventions.

1.24 However, respondents contend that the sums received through developer contributions can only be used for the purpose for which they are sought, and otherwise should be returned. More clarity/justification is sought on the proposed approach.

1.25 The approach proposed by the council aims to help facilitate the delivery of the sites identified in the local development plan, and in that respect is to be commended. However, I have doubts about whether such an approach would accord with Circular 3/2012, and the necessary tests which are to apply to all planning obligations. It would seem to be taking funds raised for one purpose and spending them on a different one, even if on a piece of infrastructure which is required as the cumulative result of development, including the one in question.

## **Is the content of the guidance sufficiently grounded in the local development plan?**

1.26 In considering this question, it will be helpful to outline the relevant parts of the local development plan.

1.27 Paragraphs 103 to 106 of the local development plan explain that part of the approach to obtaining developer contributions will be through cumulative contribution zones. These are to be within defined areas for schools, transport infrastructure, public realm and greenspace actions, to be based on the transport and education appraisals and the council’s open space strategy. The zones are to be mapped through the supplementary guidance. This is to enable a clear understanding of what is required at the outset, provide the basis for the approach to developer contributions and set a clear foundation for the action programme (that to be updated annually). Paragraph 141 again refers to the transport and schools requirements being set out in Part 1 Section 5 of the plan, and also refers to Annex C as detailing the provisions for which contributions would be sought. Paragraph 145 states that there was at that time a lack of information on the scale of healthcare contributions and how they should be addressed, and that consequently any contributions for these would need to be considered on a case by case basis where a clear justification can be provided.

1.28 Policy Del 1 sets out in more detail the basis for the contributions to be included in the supplementary guidance:

- Transport infrastructure may include the infrastructure from Figure 2 of SESplan, the transport proposals in Table 9 of the local development plan, and the interventions specified in Part 1 Section 5 of the plan.
- Education infrastructure may include the new school proposals in Table 5 of the local development plan, and the potential school extensions in Part 1 Section 5 of the plan.
- Green space infrastructure may be as required by policies Hou 3, Env 18, 19 or 20.
- Public realm infrastructure and other pedestrian and cycle actions will be in the council's public realm strategy or noted as a site-specific action.
- Cumulative contribution zones will be established for education and transport infrastructure, and contribution zones for other actions will be established if they are relevant to more than one site

1.29 The supplementary guidance is to provide guidance on the required infrastructure in relation to specific sites and/or areas and the mapping of the cumulative contribution zones. It was acknowledged in the local development plan that the guidance may come too early to incorporate the findings of the Cumulative Impact Transport and Land Use Appraisal Working Group.

1.30 In the examination report (under Issue 21) the reporter's understanding (paragraph 7) was that 'it would not be appropriate to introduce new matters through the Action Programme or specify additional items of infrastructure or the means through which they are to be delivered without first establishing these through the development plan'. She also refers to Circular 6/2013 Development Planning which states that supplementary guidance should not include items for which financial or other contributions, including affordable housing, will be sought and the circumstances, locations and types of development where they will be sought - these instead being matters to be addressed in the plan itself.

1.31 The reporter goes on to note (paragraph 27) that paragraph 121 of SESplan states that mechanisms for calculating levels of contribution should be included in supplementary guidance in a way that assists landowners and developers. She considered (paragraph 30) that policy Del 1 should establish the broad principles, including the items (generally) for which contributions will be sought and the occasions when they will be sought. The supplementary guidance should establish the methods and exact levels of contributions. Changes to the plan were needed so that (paragraph 32) the likely scope of required mitigation relevant to specific areas and the need for further assessment is more transparent, enabling (paragraph 34) a direct link between policy Del 1 and the area specific mitigation and setting the parameters for the supplementary guidance.

1.32 The reporter's recommended modifications included General Development Principles relating to the scope of the required infrastructure provision in each of the main development areas, based on the initial assessment carried out by the council in its education and transport appraisals. More detailed assessment of these matters would be required through the preparation of the supplementary guidance, the cross-boundary transport study and through the master-planning/development management process for major developments. The General Development Principles are said to be referenced in the context of initial appraisals to provide some flexibility and scope for further refinement.

1.33 The examination report states that the plan should explain the nature of contribution zones and how these would apply. The contribution zones should, it is said, be identified in supplementary guidance, not the action programme, which should not introduce new matters or approaches which are not established through the development plan.

1.34 Since no research or justification for seeking contributions towards health care provision was presented to the examination, the conclusion was that the list of items relevant to Policy Del 1 should not include healthcare.

1.35 In the light of the above, in particular with regard to the contents of the local development plan itself, but having due regard to what is set out in the examination report, I think it is useful to consider the following questions, all of which are reflected in one or more of the representations on the draft guidance:

1. To what extent does the approach set out in the guidance (the zones identified and the interventions for which contributions are required) reflect what is set out in the relevant sections of the plan itself?
2. To what extent does (and should) the guidance provide certainty as to the contributions expected from each development site?
3. What is the appropriate means by which the zones, actions and contributions in the guidance can be amended, if need be, in the future?

#### Education contributions

1.36 On the first of these questions, in respect of the education zones, the local development plan identifies the need for cumulative contributions in South East, South West and West Edinburgh, and in South Queensferry. Although the precise extent of the zones is not defined, this is clearly not city-wide.

1.37 The supplementary guidance identifies contribution zones, based on secondary school catchments (sometimes multiples thereof) across the whole of the city, albeit within parts of some of these zones no contributions are required. Therefore the geographical extent of the cumulative education contribution zones has been expanded from that foreshadowed in the local development plan. I summarise this below for each of the zones in the guidance, in the order they are presented:

**Boroughmuir/James Gillespies** – No cumulative contribution zone identified in the local development plan. Cumulative contributions required in the supplementary guidance for additional secondary and primary school capacity which are not identified in the plan.

**Castlebrae** – Part of the South East Edinburgh zone in the plan. Cumulative contributions in the supplementary guidance towards capacity at Castlebrae High School and a new Brunstone primary school, all identified in the plan. Cumulative contributions required towards capacity at Castlevie Primary School which are not identified in the plan.

**Craigroyston/Broughton** – No cumulative contribution zone identified in the plan. Cumulative contributions required by the supplementary guidance towards new non-denominational secondary school capacity and Roman Catholic primary school capacity which are not identified in the plan. Cumulative contributions also required

towards capacity at St Augustine's High School (these reflect the same contributions also required in the South Queensferry and West Edinburgh zones).

**Drummond** – No cumulative contribution zone identified in the plan. Cumulative contributions required by the supplementary guidance to primary school capacity which are not identified in the plan.

**Firhill** – No cumulative contribution zone identified in the plan. Cumulative contributions required by the supplementary guidance to capacity at Firhill Primary School which are not identified in the plan. Cumulative contributions also required towards capacity at St Augustine's High School (these reflect the same contributions also required in the South Queensferry and West Edinburgh zones).

**Leith/Trinity** – No cumulative contribution zone identified in the plan. Cumulative contributions required by the supplementary guidance towards additional capacity at Leith/Trinity Academies and Holycross Primary School which are not identified in the plan. Cumulative contributions also required towards a new Victoria Primary School. This is proposal SCH5 in the plan.

**Liberton/Gracemount** – Part of the South East Edinburgh zone in the plan. Cumulative contributions required by the supplementary guidance for several schools, all of which are identified requirements in the plan.

**Portobello** – No cumulative contribution zone identified in the plan. Cumulative contributions required by the supplementary guidance towards new primary school capacity which are not identified in the plan.

**Queensferry** – Queensferry development zone identified in the plan. Cumulative contributions required by the supplementary guidance for several schools, all of which are identified requirements in the plan.

**South West** – A South West development zone is identified in the plan. Cumulative contributions required by the supplementary guidance for additional capacity at Currie Primary School, as identified in the plan. Cumulative contributions also required in the supplementary guidance for additional capacity at Dean Park Primary School, which are not identified in the plan.

**Tynecastle** – No cumulative contribution zone identified in the plan. Cumulative contributions required by the supplementary guidance towards additional capacity at Balgreen Primary School which are not identified in the plan. Cumulative contributions also required towards capacity at St Augustine's High School (these reflect the same contributions also required in the South Queensferry and West Edinburgh zones).

**West** – West Edinburgh development zone identified in the plan. Cumulative contributions required by the supplementary guidance for several schools, all of which are identified requirements in the plan.

1.38 The various additional cumulative contributions identified in the supplementary guidance derive from the requirements set out in the latest version of the council's education appraisal. Respondents make comment on the quality of the evidence base

which this provides as justification for the contributions now required, and I return to that matter below. But the more general question to consider first is whether the extent of cumulative contributions now being sought through the supplementary guidance is sufficiently grounded in the local development plan itself, in the context of the sections of the plan I refer to above.

### Transport contributions

1.39 I turn now to the extent to which the approach to the cumulative transport contributions zones has been foreshadowed in the local development plan:

**Tram** - Proposal T1 in the plan safeguards land for long term extensions of the Edinburgh Tram to the waterfront, the south east, and Newbridge. Tram lines 1a, 1b and 1c are identified in SESplan Figure 1. Policy Del 1 provides for contributions to the existing and proposed tram network to be set out in the supplementary guidance. Paragraph 142 states that the council has already forward funded the completed section of the tram network and contributions will continue to be sought from future development which impacts on or creates a need for this infrastructure. On this basis the supplementary guidance maps the tram contribution zone based on distance to the tram line (existing and proposed) and stops, and a table is used to calculate contributions based on size and type of development and distance from the line/stops.

**Burdiehouse Junction** – within the South East Edinburgh development zone identified in the plan. Action T20, and the need for contributions referenced at page 65.

**Calder and Hermiston** – the South West Edinburgh sites are located in the southern part of the zone now identified. No reference to this action in the local development plan.

**Gilmerton Crossroads** – within the South East Edinburgh development zone identified in the plan. Action T19, and the need for contributions referenced at page 65.

**Straiton Junction** – within the South East Edinburgh development zone identified in the plan. Identified in Figure 2 of SESplan, and the need for contributions referenced at page 65 of the local development plan.

**Gilmerton Station Road/Drum Street** – within the South East Edinburgh development zone identified in the plan. Page 66 identifies 'Access and parking strategy for Drum Street' and 'junction improvement' at this location is noted on the map on page 71.

**Hermiston Park & Ride** – the South West Edinburgh sites are located in the southern part of the zone now identified. Need for contributions referenced on page 80 of the plan.

**Gillespie Crossroads** – Need for contributions referenced on page 80 of the plan.

**Lasswade Road/Gilmerton Dykes Street/Captain's Road** – within the South East Edinburgh development zone. Not referenced at page 65/66 of the plan or shown on the map on page 67. But need for junction improvements identified for site HSG39 on page 69.

**Lasswade Road/Lang Loan** – within the South East Edinburgh development zone. Not referenced at page 65/66 but shown as 'junction improvement' on map on page 67.

**Maybury/Barnton** – at the edge of the West Edinburgh development zone. Actions identified as proposals T16-18 in the plan and identified on pages 57 and 58 (map).

**Queensferry** – fairly near the South Queensferry development sites and identified on page 81 of the plan.

**South East Edinburgh (North)** – at the edge of the South East Edinburgh development zone, although Old Craighall junction is outwith it, in East Lothian. Identified in SESplan Figure 2 and on page 66 of the local development plan.

**Sheriffhall** – at the edge of the South East Edinburgh development zone. Identified in SESplan Figure 2 and as proposal T13 of the local development plan. Not referenced on pages 65/66 or shown on maps of the development sites.

**West Edinburgh** – Actions identified in SESplan Figure 2 and proposals T8-12 of the local development plan (also on page 57 although the reference numbers there are wrong). There is, for this zone, a separate page detailing total cumulative developer contributions amounting to £86m. There is also, it is said, a spreadsheet which would allow detailed calculation of the contributions required in each case, and the West Edinburgh Transport Assessment provides further background about the actions identified.

**Roseburn to Union Canal** – No contribution zone in the plan. Action is part of proposal T7 on the proposals map.

1.40 It can be seen then that the suite of transport infrastructure actions towards which cumulative contributions are sought is, though not identical to the zones and actions identified in the local development plan, more closely based on the details in the plan than is the case for cumulative education contributions.

### Healthcare contributions

1.41 I turn now to the healthcare infrastructure contribution zones. To recap on what I note above, the first part of policy Del 1 sets out the types of infrastructure provision which development proposals may be required to contribute to as a result of their impacts, either individually or cumulatively, and for which contribution zones may be established. Healthcare infrastructure is not one of these. The second part of the policy identifies these same types of infrastructure provision to be covered in the supplementary guidance. Again, healthcare infrastructure is not listed, nor is it listed in paragraph 104 of the plan which also refers to the supplementary guidance. Paragraph 145 says that the need for contributions towards other types of infrastructure, including health and community facilities, would need to be considered on a case by case basis, with policy Hou 10 being relevant.

1.42 On this basis, I do not see a strong grounding in the local development plan for the inclusion of cumulative contribution zones for healthcare infrastructure in the supplementary guidance. At paragraph 47 of Issue 21 (page 764) of the examination report, the reporter said the list of items relevant to policy Del 1 should not include health care infrastructure. I also note that, although healthcare infrastructure is listed in Appendix C of the plan as one of the types of infrastructure for which contributions may be sought, this appears to be at odds with the recommendations in the examination report (page 776) for this table, where healthcare infrastructure is not included.

1.43 I would also note that Regulation 27(2) of the Town and Country Planning (Development Planning) (Scotland) Regulations 2008 says that supplementary guidance 'may only deal with the provision of further information or detail in respect of the policies or proposals set out in that plan and then only provided that those are matters which are expressly identified in a statement contained in the plan as matters which are to be dealt with in supplementary guidance'.

#### Other contributions

1.44 For greenspace, Policy Del 1 says that contributions may be payable towards actions if required by Policy Hou 3, Env 18, 19 or 20. Contribution zones may be established where provision is relevant to more than one site. Only one cumulative contribution zone (South East Wedge/Little France) is identified in the supplementary guidance. This is action GS4 in the local development plan and is shown on the map on page 72.

1.45 For public realm, Policy Del 1 says that contributions may be required towards public realm and other pedestrian and cycle actions where these are identified in the council's public realm strategy or as a site specific action. Contribution zones may be established where provision is relevant to more than one site.

1.46 The supplementary guidance says that a new process is being developed to set priorities for public realm investment. The public realm annex to the guidance is to be updated (in fact provided for the first time) after this process is complete. It is not stated whether this will result in standard charges or a suite of contribution zones for public realm interventions. In the meantime, public realm contributions will not be pursued.

#### **Does/should the guidance provide certainty about the contributions expected from sites?**

1.47 This is the second of the three questions I identify at paragraph 1.35 above. Some respondents highlight what they see as gaps in the detail of the contribution zones, infrastructure interventions, costs and levels of contributions.

1.48 In respect of education infrastructure, the guidance shows which zone any development site would be in, sets out the infrastructure interventions required for each school (albeit in some cases there is more than one option for these), and sets a precise figure for the contribution per house or flat, as well as, where relevant, an allowance for land costs for new schools. In this respect, and on its face, the guidance provides a high degree of certainty about what is required.

1.49 At paragraph C(i) on page 4 it is stated that ‘if appropriate education infrastructure actions are identified in the current Action Programme, the contribution will be based on the established ‘per house’ and ‘per flat’ rate for the appropriate part of the Zone’. But there are actions for each zone in the supplementary guidance itself. Since that is based on the education appraisal (which in turn is based on the local development plan allocations and other sites with established development potential) I assume the intention is that, for such sites, the actions identified in the guidance itself ought to remain appropriate. But this statement does allow for the possibility that, for an allocated site, the required intervention(s) may be different from the one(s) identified in the guidance.

1.50 Paragraph C(ii) sets out what happens if the actions identified in the action programme are not sufficient to accommodate the cumulative increase in pupil numbers. This seems intended to cover the circumstances where new, unforeseen development sites emerge. My understanding is that such sites would contribute either on the same per unit basis as set out in the guidance or, if this is insufficient to provide the necessary school capacity required as a result of the additional site, a greater contribution may be required. I cover this ground at paragraphs 1.19 to 1.21 above. Although this provides less certainty about the contributions from any such ‘new’ sites, it seems a reasonable and plan-led approach.

1.51 I note that the costs for each of the education infrastructure interventions given in the supplementary guidance are indicative. Each has yet to be confirmed, and so they could vary from place to place. In responding to this point, the council says that the information on the costs of each action would be kept up to date through the action programme, along with further information about how they have been arrived at. However, Circular 3/2012 (paragraph 32) says that ‘methods and exact levels of contributions should be included in statutory supplementary guidance’. Paragraph 35 of that circular says that ‘where planning authorities propose to rely on standard charges and formulae, they should include these in supplementary guidance along with information on how standard charges have been calculated’. Circular 6/2013 contains advice along similar lines. Therefore albeit the action programme could provide different costs for the various education infrastructure interventions, it seems to me that, if following the advice in the circulars, any changes to the standard levels of contributions should be made through updates to the supplementary guidance itself. The council notes that Section 75 agreements can make provision for the repayment of costs, and applications can be made to vary such agreements through section 75A of the Act. These may provide mechanisms for the adjustment of contributions should they be shown to have been higher than was necessary.

1.52 There are more notable gaps in the information provided for transport contributions. Some of these gaps are presumably because, whilst the Cumulative Impact Transport and Land Use Appraisal Working Group has published its findings the resultant required interventions (and their costs) have not yet been confirmed. It is acknowledged in the local development plan that the supplementary guidance might come too early for the results of this work to be included. However I would have found it helpful, when reading the guidance itself, for some further explanation of the current position, and when and how these interventions are to be confirmed. I outline below the certainty and comprehensiveness of the information for each of the transport contribution zones in turn:

**Tram** – the map and table provide a comprehensive approach for calculating the contributions from developments within the zone, albeit any contributions necessary

from major developments outwith the zone are to be considered on a case by case basis.

**Burdiehouse Junction** – identified as ‘junction upgrade’ in the supplementary guidance. Cost given, and apportioned on a pro-rata basis (based on the expected number of units) to three allocated housing sites within the zone.

**Calder and Hermiston** – details of action and cost still to be established (although it appears from the zone map that the intention is for Microprocessor Optimised Vehicle Actuation (MOVA) traffic signals at the Hermiston Gate roundabout and the A720/Calder Road junction.

**Gilmerton Crossroads** – identified as ‘junction improvement’ in the supplementary guidance. Cost given, and apportioned on a pro-rata basis (based on the expected number of units) to three allocated housing sites within the zone. Here and for some other zones, it would have aided clarity to have included the local development plan reference numbers for the allocated sites.

**Straiton Junction** – details of action and cost still to be established.

**Gilmerton Station Road/Drum Street** – identified as ‘junction improvement’ in the map on page 71 of the local development plan. Cost given in the supplementary guidance, and apportioned on a pro-rata basis (based on the expected number of units) to three allocated housing sites within the zone.

**Hermiston Park & Ride** – contribution of £1,000 per unit identified.

**Gillespie Crossroads** – action not specified but presumably a junction improvement. Cost given, and apportioned on a pro-rata basis (based on the expected number of units) to three allocated housing sites within the zone.

**Lasswade Road/Gilmerton Dykes Street/Captain’s Road** – identified as ‘junction improvement’ on page 69 of the local development plan. No cost provided in the supplementary guidance, with contributions to be secured through section 75 agreements for ‘relevant sites’.

**Lasswade Road/Lang Loan** – identified as ‘junction improvement’ on the map on page 67 of the local development plan. No costs provided in the supplementary guidance, which says it is ‘to be delivered as integral part of either adjacent development secured by S75’.

**Maybury/Barnton** – identified as ‘junction improvements’ in the map on page 58 of the local development plan. Cost given in the supplementary guidance, and apportioned on a pro-rata basis (based on the expected number of units) to two allocated housing sites within the zone.

**Queensferry** – costs provided for additional cycle parking at Dalmeny Station and apportioned on a pro-rata basis (based on the expected number of units) to three allocated housing sites within the zone. Costs for additional car parking at the station yet to be established.

**South East Edinburgh (North)** – action (presumably junction improvement) at Old Craighall junction. Cost per unit (housing) and per m<sup>2</sup> (other developments) provided.

**Sheriffhall** – junction upgrade, but no costs given.

**West Edinburgh** – as I note above, there is a separate page detailing total cumulative developer contributions amounting to £86m for a list of transport actions. There is also, it is said, a spreadsheet which would allow detailed calculation of the contributions required in each case, and the West Edinburgh Transport Assessment provides further background about the actions identified.

**Roseburn to Union Canal** – presumably relates to new or improved foot/cycle path. Total cost, and cost per residential unit, given. Cost per m<sup>2</sup> for non-residential development yet to be confirmed.

1.53 It can be seen that there are some gaps in the information provided, and some differences in approaches between the zones - for example some costs being per unit, some being assigned to sites on the basis of expected numbers of units; in some zones the allocated sites are listed, for others they are not. However, gaps and variations aside, when information is provided it does appear to provide certainty

1.54 Paragraph A on page 8 of the supplementary guidance says that contributions from allocated sites will be sought as specified in the action programme and Annex 2 of the guidance. The reference here to the action programme appears to me to introduce some uncertainty and to depart from the principle that the approach to contributions is to be established through the local development plan and the supplementary guidance, not through the action programme. It may be the case, however, that the intention is that the action programme will only provide further details (like timescales, and who is responsible for delivery) and would not change the actions and costs already set out in the supplementary guidance.

1.55 The point is raised that, where the transport contribution between sites is apportioned on the basis of their expected number of housing units, there is no provision made in the guidance should the actual number of houses built be different. The council advises that it used the mid-point of the site capacity range for each site as identified in the local development plan, and that this remains appropriate. Had the transport contributions been on the basis (like the education contributions) on a price per unit, then this might have provided both certainty of costs and the flexibility to deal with variations in site capacity. That might, however, provide less certainty that, overall for each zone, sufficient contributions would be secured to provide the necessary transport infrastructure intervention. It may be that the individual section 75 agreements made for each site would in fact take account of the actual number of units to be built, but that question is outwith the scope of my report.

1.56 For greenspace, as I note above, only one cumulative contribution zone is identified – South East Wedge/Little France. This provides a total project cost and the contribution required per dwelling. Costs for non-residential development are yet to be established.

1.57 In respect of healthcare infrastructure, the status of many of the interventions are 'exploring options'. Despite that, a cost per dwelling for each of the contribution zones is identified. In that respect, certainty is provided.

### **Amending the zones, actions and contributions in the guidance**

1.58 This is the third question I identified at paragraph 1.35. The council, in responding to consultations, notes the provision to modify the zones, infrastructure interventions and the charges which apply through the action programme. It is stated that the supplementary guidance (including annexes) would be updated following changes to the action programme. As I note above, in my view the appropriate place for setting out the zones, actions and contribution rates is the supplementary guidance itself. To do otherwise would create uncertainty and a lack of transparency. The council has consulted on the supplementary guidance, including the annexes, under the requirements of Section 22(3) of the Act and Regulation 2 of the Development Planning Regulations. It seems to me that, in order to make any substantive changes to the guidance, including to the annexes, the council would need to follow the same statutory procedures again, giving the opportunity for representations to be made on the revised guidance and having to notify Ministers before adopting it. I am not aware whether the council has considered the need to do this. It would be likely to add significantly to the time taken to review the guidance, a factor which ought to be borne in mind if the council intends regular reviews.

1.59 There is also the separate, but related, consideration about the extent to which one or more future reviews of the guidance would affect the level of certainty for developers and communities which it was intended to bring.

### **Section 75 agreements must restrict or regulate the development or use of land**

1.60 Respondents highlight this requirement from Section 75 of the Act, in particular in the light of the Supreme Court decision on the Elsieck case. In response the council says that its model section 75 agreement requires contributions to be made prior to the commencement of development and therefore regulates the development of land. In any event, this question is beyond my scope in considering the supplementary guidance itself.

### **Format and clarity of the supplementary guidance**

1.61 One suggestion made is that the allocated sites should be shown within the zones. Provided this could be done without unduly cluttering the maps, I agree that this would have been helpful, in particular if it clarified which sites were to contribute. Likewise, I would tend to agree with the suggestion that it would have been clearer for the amounts of the secondary school contributions to have been set out in each education zone map rather than having to calculate these by subtracting the primary school contribution from the full contribution.

1.62 One respondent argued that the details of policy Del 1 (and also Tra 8) should be replicated in the supplementary guidance. But since the supplementary guidance and the local development plan need to be considered as a whole – both would be part of the development plan – I see no real need for this.

## **2 EDUCATION CONTRIBUTIONS**

### **The evidence for the need for contributions**

2.1 Several respondents make the claim that, for education but also for transport and healthcare, which I return to below, the supplementary guidance and associated appraisals do not sufficiently demonstrate that the cumulative contributions being sought comply with the 5 tests for Section 75 agreements set out in Circular 3/2012.

2.2 Respondents seek clearer evidence showing the extent and degree of current deficiencies in school capacities so that this can provide a baseline to consider any additional requirements as a result of new development. The guidance needs, it is said, to set out the direct impact allocated sites would have on education capacity of schools and set out the action required to mitigate this, including cumulative action. Respondents consider that there is a lack of evidence to separate out the impacts on school rolls from new development from that from existing development and rising rolls more generally. I have sympathy with these concerns - this is an important factor if the tests in the Circular are to be met.

2.3 There are comments made by some respondents about the particular approaches at specific sites or areas, including at Western Harbour, Leith, the International Business Gateway and West Craigs. However I do not have the kind of information before me to comment at this level of detail, and I therefore restrict myself to the more general matters raised by the approach in the supplementary guidance and the evidence from the education appraisal.

2.4 It is also argued that the guidance needs to demonstrate that the best use of existing infrastructure would be made before the need for new infrastructure is required – that it should identify existing spare capacity and say how this will be used. It is asked what other options were considered (such as catchment reviews), why has the proposed approach been taken, and how has it been demonstrated that this is the most cost-effective means of resolving capacity issues?

2.5 The supplementary guidance does not itself set out the evidential basis for its proposed approach to cumulative contributions. It is the education appraisal which the council puts forward as the detailed justification for its proposed approach, and that (or an earlier version of it – the August 2018 version is the one I refer to below) was available to respondents during the consultation process. However, in my view the appraisal does not provide the kind of comprehensive and detailed evidence for the approach to cumulative education contributions which interested developers and landowners would wish to examine. I do not doubt the council's intention only to require contributions on the basis of the additional impacts from the new housing development, indeed this is stated in the final paragraph on page 5 of the guidance. My concerns are instead about the evidence presented. Paragraphs 4.1-4.10 of the appraisal outline the methodology followed, but do not in my view provide the kind of detail which allows full scrutiny of that in the context of the tests in the circular, and nor do the subsequent sections in the appraisal covering each of the zones.

2.6 The education appraisal reports (section 3) rising primary school rolls in recent years. These rises are projected to continue, as are secondary school rolls (which have been falling in recent years).

2.7 In addition to the education appraisal I read the council's December 2016 report to the Education, Children and Families Committee providing school roll projections - [committee item 7.1](#) on the council's website. This document is referred to both in the education appraisal itself and in the council's response to the consultations on the draft supplementary guidance. It provides some further information about how the projected school rolls are calculated.

2.8 At paragraph 3.6 of that report, it is explained that the primary school projections are informed by data including catchment birth data, catchment population analysis, housing data (from the Housing Land Audit and known development information) and from National Records of Scotland 2014-based population projections. The school rolls are shown in the tables at Appendix 2 of the report.

2.9 I am not aware what particular housing sites are included in that housing data. Since the school roll projections are said by the council to be the basis for the need for contributions from new housing development in the local development plan, I assume that the housing allocations (or some of them at least) are included in that data.

2.10 One issue raised by respondents is the potential for double counting between general projections of population growth and the additional population from new housing development. I can at least see the potential for such double counting. The amount of land allocated for housing in the local development plan follows on from the requirements of SESplan (and its housing land supplementary guidance), which is informed by a Housing Need and Demands Assessment. So in one sense development plan housing allocations need to be seen as a response to expected (or desired) increases in population, not as a wholly separate influence on population change. However I do not have detailed evidence on these matters, so it would be fruitless to speculate further on this particular issue. And I would acknowledge the point that it is through the development plan allocations that the precise location of much of the population increase within the city is determined, and therefore which particular schools or zones would be affected by this.

2.11 In any event, what the council's committee report does not show (and nor does the education appraisal) is, for each school, what proportion of the projected future roll is expected to come from pupils from the housing allocations in the local development plan. Therefore it does not show whether, and if so to what degree, for each school, the new housing development is forecast to give rise or contribute to accommodation needs which cannot be met from within the existing school estate. It may be reasonable to assume that the majority of increases in the projected roll of a school, in particular one with significant new development expected to take place within its catchment, will be from pupils on newly built houses and flats. But without showing what this component is projected to be, the basis for the requested contributions is not completely transparent.

2.12 It may be that this kind of more detailed evidence is available to the council, indeed I expect that it would need to be, in order to have provided the basis for the proposed approach. If the component of the projected roll for each school which comes from new housing is based on the council's assumptions about the rate of new housing delivery and the pupil generation rates per house and flat, then it ought to be possible to show this kind of information. It may be that it would be the kind of information provided to justify section 75 agreements at the time they are to be agreed. But it is not evidence which I or the

respondents to the consultation process are party to, and therefore I cannot answer some of the questions they raise.

2.13 It could perhaps be argued that, since all the housing development supported in the local development plan and on other land with housing potential would, collectively, significantly exceed the existing capacity of the school estate, therefore there is no particular need to demonstrate, for each site and for each school, what the effects of development would be. But the council's approach is more subtle than that, seeking to deal with the issues on a zonal basis. Therefore I would have expected to see more evidence to demonstrate, at the least, the cumulative effects of development zone by zone.

### **The justification for the approach in each zone**

2.14 Paragraph 2.1 of the education appraisal says that it will be necessary to redraw school catchment boundaries to align new developments to existing schools with spare capacity or greater expansion potential. I think this clearly demonstrates the intention to make best use of existing school capacity. In my view it is for the council to decide how to make best use of the school estate. Although reducing the costs of interventions may be one driver in this, it would not necessarily be the only one. Therefore I am not persuaded that the council would need to show, for example, that the approach it proposes is the lowest cost one.

2.15 But I would have expected, since the extent, pattern and amounts of developer contributions are contingent upon it, a more detailed justification for the approach the council wishes to pursue. The supplementary guidance shows what zones (and sub-areas) the council has decided to employ, the suite of interventions for each, and the implications of this, in cost per dwelling, for each development site within the sub-areas. The education appraisal provides more detail, showing for each zone the capacity of the schools and the number of pupils estimated to come from the various development sites. But it does not detail how those new pupils will affect the rolls of the listed schools and what that means for their ability to cope. There is some narrative explanation of what effects are predicted and of the proposed solution for each zone but this falls short of the more quantitative analysis of the capacity issues caused by development and of how the solutions proposed will resolve them which developers and landowners could reasonably expect to see as justification for the very specific set of actions and contribution rates set out for each zone/sub-area.

2.16 Some respondents argue that the guidance should show the planned changes to the catchment areas (even if only broadly) and what this means for future pupil numbers at each school, from both existing pupils/housing areas and from new development. Whilst I acknowledge the council's point that catchment area reviews are subject to statutory consultation processes which cannot be pre-empted, information along these kinds of lines (properly caveated) would at least have helped to show more about the council's proposed approach in each zone and why this is considered by the council to be an appropriate response to the capacity issues raised.

2.17 I do not go as far as to agree with some respondents who stated that there should be more evidence on the alternative options which the council might have considered, or that the guidance should allow for alternative options to be put forward on a case by case basis. As I state above, I think the council is entitled to plan a way forward for the school estate which it considers will be best suited to its future needs, and not to encourage one-off,

bespoke solutions which could throw that plan into doubt. It would still be open to the council to consider alternative school capacity solutions put forward by developers on a case by case basis, but it would not be in the interests of certainty and a planned approach to encourage this through the supplementary guidance.

### **Should contributions be levied only for the catchment school(s) for a development?**

2.18 The principle of cumulative contribution zones is established in the local development plan under policy Del 1 and its supporting text. It is argued by some respondents, however, that housing development should only be required to contribute to education infrastructure actions within the school catchment area of the development concerned. I would acknowledge that a cumulative approach could be restricted to individual school catchment areas. However I am not convinced that it must be.

2.19 Respondents argue elsewhere that catchment reviews should be used to change catchment areas of schools to free up (and therefore make most efficient use of) existing capacity. This to me is an acknowledgement that catchment areas need not be fixed and can be used, as indeed the council intends, to best accommodate new development. I think it is difficult to argue that the council cannot then go further and set out how it would use the capacities and catchment areas of a number of schools together to make best use of these across a larger area. Separate legislation governs the process of changing school catchment areas. It has not been put to me that, specific development sites having been allocated in the local development plan, the council cannot now propose catchment changes to those schools where allocated housing sites fall within them. Aside from any approach to cumulative contributions, the council would want to continue to manage the school estate (including the approach to catchment areas) to ensure it meets future requirements, including but not limited to those arising from new housing development. Therefore it seems to me that the extent of a catchment area at any point in time cannot be considered to be a strictly limiting factor on the extent to which a development within it can be said to raise school capacity issues in a wider context.

### **Should school capacity be ‘first come first serve’?**

2.20 One respondent argues that school capacity should be apportioned to developments on a first come first served basis – any existing spare capacity would be allocated to the first developments to progress, with only the balance of new development after capacity has been taken up being required to contribute to the further school capacity then needed. Whilst this might be an approach the council could have pursued had it wished, it does not seem to me to fit so well with the principle of cumulative contribution zones, as established in the local development plan, when compared to the proposed approach of spreading a more even share of the costs across all developments.

### **Assumptions about travel to school thresholds**

2.21 In forecasting the extent to which Roman Catholic pupils will go to a Roman Catholic secondary school rather than a non-denominational school, the council takes account of distance to the school. So for some developments which are at greater distance to a Roman Catholic school, all secondary pupils are assumed to go to the nearer non-denominational school instead. One respondent asked for more information on what distance the council applies in making such an assessment, but I am not aware of any answer to this which the council may have provided.

## **Land and development costs for new schools**

2.22 The council advises that it commissioned an independent assessment of land costs for the sites for the new schools identified in table 5 of the local development plan. These estimated costs for each school site are set out on page 18 of the supplementary guidance, but with the caveat that they are indicative only. The cost of the land is to be shared by all the developments within the zone or sub-area where the new school site is located. The supplementary guidance adds these land costs (where they apply) to the per unit contributions identified.

2.23 One respondent expresses the view that contributions to these land costs from all developers in a zone/sub-area should be at residential value, whereas Homes for Scotland expressed the view that it should be at existing or final use value. It is not clear to me from the council's responses whether or not the valuation used is at residential value - the costs on page 18 vary from just under £500,000 per hectare at Granton Waterfront to about £2.4m per hectare at Maybury. On the basis of a cumulative approach to meeting education capacity constraints, and a consistent per-unit contribution for all the sites contributing towards the same education action, I can see that basing contributions for land costs for schools on residential value could be considered an equitable approach. In any event, it would have been helpful had the guidance provided more explanation of the basis for the assumed costs for land.

2.24 In addition to the cost of the land, the table on page 18 also provides estimated costs (again indicative) for remediation and other abnormal development costs for each school.

2.25 Respondents consider that the estimated remediation/abnormal costs are too high, and one suggests that it may be better for the developer to remediate the land rather than that cost be added to the contributions. On the latter point, the council's response indicates that this could be done, with the costs credited against that overall developer contribution.

2.26 In response to criticisms that the size requirements for new school buildings have been increased from the previous draft of the guidance, the council advises that these have, in the finalised version, reverted to the previous size for primary schools, and that the allowance of 11m<sup>2</sup> per secondary school pupils is based on Scottish Government guidance. I do not have the kind of detailed evidence before me which would allow me to reach a view on whether the sizes of school sought by the council are appropriate. However, as the statutory education authority, I would expect the council to be in the best position to reach an informed and reasonable view on this matter. Section 5 of the education appraisal provides further information about the assumed space requirements and costs of new schools.

2.27 The supplementary guidance says that these land and remediation costs, and the costs of the build works themselves, will vary from the estimates. This would mean that the amounts of the contributions levied would be different from those set out in the guidance.

## **Pupil Generation Rates**

2.28 The basis for the council's assumptions about the 'pupil generation rates' from new housing development has been questioned. The education appraisal explains (paragraph 4.3) that these are based on the average numbers of pupils generated by new development over a ten year period. Although I have not seen the raw data for this I see no reason to

suppose that the figures provided by the council, acting in its capacity as education authority, are not appropriate.

### **Retaining contributions for 30 years**

2.29 There is much criticism of the statement in the supplementary guidance that contributions towards education infrastructure may be held by the council for up to 30 years. It is argued that this is far too long, and any infrastructure for which contributions have been paid should be delivered in a much shorter timeframe. However it is stated in the supplementary guidance that this 30 year period is from the date of construction of the new infrastructure. It is explained that this is because of the need to accommodate revenue-based funding mechanisms where the project will be delivered but then the capital cost is repaid as part of a longer-term funding arrangement. I see no difficulty with this in principle. The contribution would be paid by the developer and go towards new school infrastructure which is then delivered. Whether that contribution is paid immediately to the school provider or whether it is held by the council for a longer period and used in stages as part of such a longer-term finance arrangement would not, it seems to me, materially affect the basis for seeking the contribution in the first place.

### **7.5% contingency costs**

2.30 The education appraisal applies a 7.5% contingency to the estimated costs of new education infrastructure. Homes for Scotland queries the basis for this, which the council says is to enable the risk of contributions not meeting construction costs due to inflation uplift. Since the costs in the guidance are index linked, I am not clear why a contingency would also be needed to account for inflation, although I can understand that it may be prudent to build in some contingency for unexpected site-specific costs. Clarification would have been helpful.

### **3 TRANSPORT CONTRIBUTIONS**

#### **The evidence base**

3.1 As with the education contributions, respondents assert that there has been a failure to provide sufficient evidence to properly demonstrate the impacts of new development on transport infrastructure or to justify the cumulative contributions sought. It has not been shown, it is stated, that there is a more than trivial link (again referencing the Elswick case) between the developments in the local development plan and the infrastructure actions to which they are to contribute. Nor are the expected costs justified in the supplementary guidance.

3.2 The basis for what are described as the 'large' cumulative contribution zones for transport infrastructure is also questioned. Some of the infrastructure actions are said to be remote from the developments which are to contribute towards them. It is stated that the relationship between each development, its transport impacts and the actions to which it is to contribute to have not been set out. In particular noting that there is to be a standard charge per (expected) housing unit in each zone, regardless of the location (and therefore impact) of any particular development site.

3.3 The council refutes this, pointing to the transport appraisals. In relation to the cumulative contribution zones used, it says that these are in fact relatively small, tightly drawn zones which ensure more than a trivial connection between the developments and the actions to which they must contribute.

3.4 One respondent considers that the supplementary guidance should confirm when the necessary actions require to be carried out, but it seems to me that this would normally be a matter addressed through planning conditions or obligations or in the action programme.

3.5 In providing my observations on these matters, I refer first to the transport appraisals which the council refers to, and which seek to provide (along with the development plan itself) the main justification for the approach taken in the supplementary guidance.

3.6 The original transport appraisal for the local development plan is dated March 2013. It was based on the first proposed plan. Subsequent to that, the SESplan housing land supplementary guidance was adopted, requiring greater amounts of housing land to be allocated, incorporated into a second proposed plan. The adopted local development plan included yet more sites, and the capacity of some of the earlier proposed sites had changed. Therefore an addendum to the transport assessment was published in November 2016, after the local development plan had been adopted, to reflect the changes since the first appraisal. I have had regard to both the addendum and the original appraisal. I have not considered in any detail the West Edinburgh Transport Appraisal nor the results of the Cumulative Impact Transport and Land Use Appraisal Working Group, as these would not significantly affect the main conclusions I reach.

3.7. It is explained first of all (in the original transport appraisal) that it was prepared to inform the local development plan and its action programme. The stated purpose of the appraisal was to assess the impact of the local development plan strategy on the transport network, and to identify the transport interventions required to ensure that the strategy does not have an unacceptable negative impact on the transport network.

3.8 The appraisal explains how trip generation rates for each development were derived, and that baseline modal split assumptions were based on census and household survey data. As well as the impacts from local development plan sites, the impacts of earlier, committed sites and of changes in traffic levels more generally were also included. A gravity model was used to identify the distribution of trips to/from homes and workplaces, and allowing for the effects of distance between these. Professional judgement was used to assign the proportion of trips to particular roads.

3.9. Three scenarios are modelled. The first of these can be given limited weight because it ignores the benefits of various transport interventions which are described as 'committed'. Scenario 2 assumes these committed schemes are implemented. The consultants undertaking the work held workshops with council officers and these then informed a list of further potential interventions. A number of criteria were used in selecting these interventions, including facilitating a shift to more sustainable forms of transport, reducing the impacts from travel, and deliverability. Account was taken of the five tests for planning conditions. Scenario 3 assumes that these other potential interventions are also implemented. The mode shares in scenarios 2 and 3 (and therefore the assumptions about vehicle trips on each route) are estimates based on professional judgement of the likely effectiveness of the interventions included, rather than detailed modelling.

3.10 The addendum appraisal updated this analysis in the light of the final suite of housing and other development allocations in the adopted local development plan. It is worth referring to some of these in considering the question (raised by several respondents) of to what extent the appraisals (and of course the local development plan itself) justify the proposed approach in the supplementary guidance.

3.11. The original appraisal says that, for the two strategic development areas where significant new development is proposed (West Edinburgh and South East Edinburgh) there are some common interventions that more than one site would benefit from.

3.12. In West Edinburgh, the five sites included in the original appraisal were Maybury 1 and 2 (now a single local development plan allocation), the International Business Gateway, Edinburgh Park and Cammo. The common interventions include improvement schemes at the Maybury, Barnton and Craigs Road junctions (T16-18 in the local development plan). In appendices B and C of the appraisal (where the interventions required for each site are identified), only the Maybury site is required to contribute to all of these three junction improvements. For Cammo it is just Maybury and Barnton, for the International Business Gateway it is Maybury, and Edinburgh Park need not contribute to any of them.

3.13. The capacity of the Maybury site had increased significantly by the time the addendum appraisal was prepared. The addendum says that the interventions identified previously would remain appropriate but that it is 'even more essential' that the Maybury and Barnton junction improvement schemes are provided. The **Maybury/Barnton contribution zone** (which covers the Maybury, Barnton and Craigs Road junctions) identifies only the Cammo and Maybury sites as contributors, and with both sites seemingly contributing to all 3 schemes. Given the relatively large number of interventions identified for **West Edinburgh** and the further transport appraisals for that area, I have not sought to look into the fine detail of the evidence for that zone.

3.14. Amongst the additional sites included in the addendum are those at South Queensferry (HSG32 and HSG33). For both of these, helping to provide enhanced car and cycle parking at Dalmeny Station are identified requirements. This is consistent with the **Queensferry** Transport Contribution Zone in the supplementary guidance, although I note that the Springfield site (HSG1 – identified in the local development plan as an existing housing proposal) is also included as a contributor in the guidance.

3.15. In South East Edinburgh the original appraisal included six sites and there are common interventions which are said to apply to 'various groups of sites'. The addendum considered capacity changes to some of these sites, but also some additional sites. There are multiple, overlapping transport contribution zones in the supplementary guidance in South East Edinburgh, so it is easiest to consider each of these in turn, in the order they appear in the map pages in the guidance:

**Burdiehouse Junction.** Broomhills (HSG21) and Burdiehouse (HSG22) are listed in the supplementary guidance as contributors. There are no other allocated sites within the zone, but the guidance also assumes a contribution from development of unallocated land identified as 'East of Burdiehouse'. This is all consistent with the details for these sites given in the transport appraisals.

**Gilmerton Crossroads.** Gilmerton Dykes Road (HSG23), Gilmerton Station Road (HSG24) and The Drum (HSG25) are listed in the supplementary guidance as contributors. No other sites are identified as contributors, albeit North of Lang Loan (HSG39) may slightly jut in at the southwest edge of the zone. This is all consistent with the details for these sites given in the transport appraisals.

**Straiton Junction.** Details of the action and cost are still to be established. There are no sites identified within the supplementary guidance as being contributors, although the sites at Broomhills (HSG21) and Burdiehouse (HSG22) would fall within it, as might the southwest tip of North of Lang Loan (HSG39)

**Gilmerton Station Road/Drum Street.** As with the Gilmerton Crossroads zone, Gilmerton Dykes Road (HSG23), Gilmerton Station Road (HSG24) and The Drum (HSG25) are listed in the supplementary guidance as contributors. There are no other allocated sites within the zone. The Gilmerton Dykes Road site is not identified in the appraisals as having to contribute towards this junction improvement, but the other two sites are.

**Lasswade Road/Gilmerton Dykes Road/Captain's Road.** No cost for this action is given in the supplementary guidance. It is stated that contributions are to be secured through section 75 agreements for 'relevant sites'. The supplementary guidance does not identify which sites that may be, although the transport appraisal addendum identifies the site at North of Lang Loan (HSG39) and the unallocated land at Lasswade Road as requiring to help towards this junction improvement. The sites at Gilmerton Dykes Road (HSG23), Gilmerton Station Road (HSG24) and Ellen's Glen Road (HSG28) are all within the zone.

**Lasswade Road/Lang Loan.** The supplementary guidance says this is to be delivered as an integral part of 'either adjacent development' and secured by a section 75 agreement. No cost is given. The transport appraisal update says that the site at North of Lang Loan (HSG39) is to replace this roundabout with a

signalised junction. It also identifies the need (should they be developed) for contributions towards this from the unallocated sites at East of Burdiehouse and Lasswade Road.

**South East Edinburgh (North).** The supplementary guidance identifies that this relates to contributions towards improvements to the Old Craighall Junction, with estimated costs of only £16.84 per unit, derived from draft guidance prepared by East Lothian Council. Although not identified in the guidance, the sites at Newcraighall North (HSG26), Newcraighall East (HSG27) and Brunstane (HSG29) are all within the zone. The original transport appraisal does not identify the need for the Newcraighall sites to contribute towards this action. The appraisal addendum, for the Brunstane site, identifies the need to 'review operation of A1/Newcraighall Road junction and help provide improvements, if deemed necessary.'

**Sheriffhall.** The supplementary guidance does not identify a cost for this junction upgrade, or the sites which would be expected to contribute. The sites at Edmonstone (HSG40), Edinburgh Bioquarter (Emp2), Moredunvale Road (HSG50) and (partially) the Drum (HSG25) are within the zone. Grade separation of this junction is noted in the original transport appraisal as a relevant committed intervention for the Moredunvale Road site, with 'minor impact', as it is in the addendum for Edmonstone, Brunstane (HSG29) and The Wisp (HSG41).

3.16 In respect of the other transport contribution zones, the transport appraisals assist as follows.

3.17 **Calder and Hermiston.** The supplementary guidance does not provide details of this action or its cost. A wide zone is identified to the west, but it is not stated which sites would be contributors.

3.18 **Hermiston Park & Ride.** The supplementary guidance specifies a contribution of £1000 per unit. A fairly wide zone is drawn to the west and south of Hermiston, but the sites which are to be contributors are not identified. The extension to the park and ride is identified as a relevant committed intervention with 'minor impact' for Riccarton Mains Road (HSG35), Curriemuirend (HSG31), Curriehill Road (HSG36), Newmills Road (HSG37) and Ravelrig Road (HSG38).

3.19 **Gillespie Crossroads.** This zone extends west along the A70 from the Gillespie Crossroads. The supplementary guidance identifies the need for contributions from Newmills Road (HSG37), Curriehill Road (HSG36) and Ravelrig Road (HSG38), all in accordance with the transport appraisal addendum. The sites at Riccarton Mains Road (HSG35), Curriemuirend (HSG31) are also within this zone but not identified as contributors in the supplementary guidance. The original transport appraisal identifies the need for the site at Curriemuirend to help towards the Gillespie Crossroads Scheme.

3.20 Table 10 of the appraisal addendum shows predicted road traffic levels assuming there are no transport infrastructure interventions beyond those considered as already 'committed' (scenario 2). Total increases in traffic by 2025 (assuming all the local development plan and other committed development sites are complete) range from 9.2% on the A71 Calder Road to 66.8% on Lasswade Road (although each road of course starts from a different baseline level of traffic, Lasswade Road for example being the quietest road included, the A720 city bypass being the busiest). The percentage of this increase from the

baseline arising from the local development plan sites on their own ranges from zero (on the A702 Biggar Road) to 58%, again on Lasswade Road. The largest absolute increases due to the local development plan sites, in vehicle numbers, are on the A8 Glasgow Road and A90 Queensferry Road. All of the key corridors identified in the appraisals are forecast to experience increase in vehicular traffic volumes of more than 5%. Of the 14 roads included, 12 are forecast to see increases exceeding 10.0%.

3.21 Table 13 of the appraisal addendum shows predicted traffic levels assuming all the additional interventions are implemented (scenario 3). Total increases in traffic by 2025 range from 8.9% on the A71 Calder Road to 61.8% on Lasswade Road. The percentage of this increase from the baseline arising from the local development plan sites on their own ranges up to 53.4%, again on Lasswade Road. The largest absolute increases due to the local development plan sites, in vehicle numbers, remain on the A8 Glasgow Road and A90 Queensferry Road. All of the key corridors are still forecast to experience traffic increase of more than 5%. Of the 14 roads, 10 are now forecast to see increases exceeding 10.0%.

3.22 I note above that the appraisals were prepared to inform the local development plan (although the addendum post-dated the plan's adoption) and its action programme. I take no issue with that purpose, but it is worth noting that the appraisals are now put forward as the background evidence for the supplementary guidance. As the supplementary guidance would, in effect, be the basis on which subsequent planning obligations for specific sites (based, in some zones, on precise costs set out in the guidance) would rest, this is a slightly different purpose. To serve that purpose, a more detailed, quantitative approach might be expected so as to demonstrate compliance with the tests for planning obligations set out in Circular 3/2012.

3.23 The original appraisal stated that the suite of interventions identified for scenario 3 (some of which are the basis for the interventions in the contribution zones in the supplementary guidance) were those required to ensure that the overall local development plan strategy did not have an 'unacceptable' negative impact on the transport network.

3.24 However the appraisal does not identify what is unacceptable. At the point of determining which interventions to apply for scenario 3, it is explained that various criteria were used in selecting these additional interventions. At that stage this was necessarily and understandably an exercise which required qualitative, professional judgement. For those interventions that facilitate a shift in favour of more sustainable transport modes, the resulting modal shifts set out in the appraisal in scenario 3 derive from an assessment of what the results of applying these interventions would be, not from target levels which the interventions were designed to achieve. I do not take issue with this pragmatic approach, but it is relevant to a consideration of how, when considering the case for section 75 agreements for contributions towards some of these interventions, the necessary tests set out in Circular 3/2012 can be shown to be met.

3.25 For the junction improvements which are identified in the appraisals, I can again understand why a qualitative and pragmatic approach was taken, but this does affect the ability, now, to understand more about the benefits (for example in lengths of queues, journey times and so on) that these interventions would deliver. Again that may be relevant in considering whether they are needed to make the cumulative transport effects of the local plan development strategy 'acceptable'.

3.26 The appraisals explain that, in selecting the interventions, regard was had to the necessary tests for a planning condition. Any planning obligations based on the cumulative contributions in the supplementary guidance will need to meet the tests set out in Circular 3/2012, including being necessary to make the development acceptable in planning terms and fairly and reasonably relating in scale and kind to the proposed development.

3.27 In relation to necessity, it is worth considering what guidance the local development plan has to offer. Policy Del 1 itself is couched in fairly general terms, requiring contributions where relevant and necessary to mitigate any negative impact, either individually or cumulatively, and where commensurate with the scale of the development. Paragraph 270 of the local development plan refers to mode share targets set out in the local transport strategy, but I am not aware how these relate to the improvements in mode share which some of the interventions in scenario 3 were judged likely to deliver. Policy Tra 8 is also worded in general terms, requiring that individual and cumulative transport impacts can be addressed so far as this is relevant and necessary. It also requires that the transport infrastructure in Table 9 of the plan and in the general and site specific development principles has been addressed, as relevant to the proposal. Paragraph 285 then states that these details take into account the impact of development proposals as far as is known at the time, but that further assessment is required to inform the detail of the necessary transport proposals and other interventions.

3.28 This context puts significant weight on delivery of the infrastructure items listed in the plan itself. Beyond that, it requires a planning judgement to be made in respect of when the impacts of development are considered to be at 'acceptable levels'. The appraisal addendum shows that, in terms of mode share, the interventions for scenario 3 show anticipated improvements. But there is no detailed explanation of why, site by site or as a whole, this renders the mode share of the proposed developments acceptable when it otherwise might not have been.

3.29 The effects of the interventions on the amount of traffic on each route are predicted in the appraisals. The appraisals assign trips to routes, but they do not show direction of travel or specify the increases in traffic at specific junctions. The effects on the safe and efficient operation of the road network as a result of the junction improvements amongst the scenario 3 interventions are not explained. I am not aware, excepting the additional analysis for West Edinburgh, of any further assessment beyond the transport appraisal and its addendum such as may be envisaged under the terms of paragraph 285 of the plan.

3.30 Turning now from the analysis in the transport appraisals to the supplementary guidance, and acknowledging that there is guidance provided in the local development plan itself, it would have been helpful to have had an explanation of the basis for how the content of the plan and the evidence in the appraisals was used to inform the approach in the supplementary guidance to the cumulative contribution zones. For example, showing how the appraisals translate into the zonal approach taken, and explaining why each particular set of developments are contributing to each particular intervention.

3.31 I am not aware of any detailed explanation for the basis, in defining the extent of most of the zones relating to junction improvements, for using a 1km radius. Nor why elongated zones were identified for the Gillespie Crossroads junction improvement (albeit I assume this is because traffic from development sites stretched out westwards along the A70 would pass through this junction) and for the Sheriffhall zone. Likewise why the South East Edinburgh (North) zone is an irregular shape rather than one based on distance to the

Old Craighall junction, and why the Calder and Hermiston Zone is fairly widely drawn. The zones relating to public transport interventions (Hermiston Park & Ride and South Queensferry) are also not based on simple distance to the intervention. I do not say that the shapes of these various zones are inappropriate, simply that I am unaware of the basis for the geographies identified. Since the extent of the zones affects which developments need to make a contribution, this is not, in my view, an insignificant matter.

3.32 The requirement that contributions in planning obligations must be related to the scale of the development proposed is also relevant to the question of how the zones are drawn. The logic behind linking the scale of the contribution to the number of units at each site is clear. But it is arguable that, to be fully justified, where several developments are making the same per-unit contribution to an intervention (or to a number of them) it should be demonstrated that their per-unit impacts would also be identical.

3.33 Some respondents question why, for a contribution zone based on a single intervention, each site would make the same per-unit contribution regardless of its distance from the junction. Again, some further explanation of this in the guidance or some other supporting evidence would have been helpful.

3.34 In respect of the costs of each intervention (and therefore the scale of the contributions required) I have no reason to doubt that, where costs are supplied for junction improvements in the supplementary guidance, that they are based on reasonable evidence. But it would have been helpful to have seen further evidence explaining the basis for them.

3.35 There are other matters of detail on which I would have found it helpful to have seen an explanation as to why the supplementary guidance seems to depart from what is foreshadowed in the local development plan and/or the transport appraisals. For example:

- There is no explanation as to why the contribution per unit for the Hermiston Park & Ride is £1,000.
- In the Maybury/Barnton zone, both the Cammo and Maybury sites would contribute to all three junction improvements identified. This is slightly different from the recommendations in the appraisals.
- In the South Queensferry zone, the site at Springfield (HSG1) is to make a contribution but this does not seem to be foreshadowed in either the appraisals or the local development plan itself.
- In the Gilmerton Station Road/Drum Street zone, the Gilmerton Dykes Road site (HSG23) is a contributor but this requirement is not (as it is for the other 2 sites in this zone) identified in the transport appraisals.
- It is not entirely clear to me how the contributions are to be handled in the Lasswade Road/Gilmerton Dykes Street/Captain's Road zone. Although several sites are within this zone, the appraisal and the local development plan identify only the allocated site at North of Lang Loan (HSG39) and the unallocated site at Lasswade Road as needing to make a contribution. Therefore it may be that, if both are developed, both would contribute.
- Likewise, I assume that, for the Lasswade Road/Lang Loan zone, North of Lang Loan would be the only contributor (although this does not appear to be identified as a requirement for this site in the local development plan) unless one or both of the unallocated site were also to gain planning permission.
- In the Gillespie Crossroads zone, I am not clear why the site at Curriemuirend (HSG31) (despite this requirement being included in the local development plan and

the appraisals) is not a contributor nor, for that matter, the site at Riccarton Mains Road (HSG35) which is also within this zone.

3.36 Since the Straiton, Sheriffhall and Calder & Hermiston junction zones say that the costs and actions are still to be established and do not identify which sites would be contributors, I make the assumption that it would be for a future iteration of the supplementary guidance to set out what, if any, cumulative contributions would be required from these zones.

### **Which categories of development are covered by the cumulative contribution zones?**

3.37 Respondents ask what categories/scales of development (other than housing) would be required to make a contribution towards the transport actions in the cumulative contribution zones. Table 1 of the supplementary guidance does not identify any particular category of development. At page 8 it is stated that other development proposals will be considered on a case-by case basis. Albeit it would have been open to the supplementary guidance to provide more details, I think the council is entitled to take this approach, including in considering whether the existing lawful use of the site needs to be taken into account in deciding the need for developer contributions.

### **Cumulative assessment in transport appraisals**

3.38 For development proposals which are not allocated sites or within the contribution zones identified, the supplementary guidance says that transport assessments must be prepared, with cumulative assessments which take account, amongst other things, of developments proposed in current planning applications and in Proposal of Application Notices. It is argued by some respondents that this is unreasonable, and assessments should only consider development which is committed or supported by the council through the local development plan allocations. In responding, the council points to the glossary definition of 'cumulative impact' in Scottish Planning Policy, which includes developments proposed in 'valid applications which have not been determined'. Although the council points out that Proposal of Application Notices can lead to valid applications thereafter, and that the need to identify cumulative impacts of development is identified in the local development plan itself, I do not find that the glossary item in Scottish Planning Policy lends support to requiring development proposed on Proposal of Application Notices to be included in cumulative assessments.

### **Exemptions from making contributions**

3.39 Network Rail and the Port of Leith Housing Association both argue that they should be excluded from the contributions on the basis that they are publicly owned or funded. The council in response says that the impacts of development require to be mitigated regardless of who the developer/landowner is. I see no imperative that the supplementary guidance make particular categories of developer or landowner exempt from the need to make contributions.

### **Trams**

3.40 Respondents raise several issues in relation to the provisions in the supplementary guidance for cumulative contributions towards the tram system.

3.41 It is argued that, since it is uncertain that the future extension of the tram network will proceed, it is premature and unnecessary to seek contributions towards this at the present time. It is also argued that there is no basis to seek contributions towards those parts of the tram network which have already been delivered, in particular as the costs of that over-ran. However, quite aside from what the supplementary guidance may say, Policy Del 1 in the local development plan already establishes that contributions may be required towards the existing and proposed tram network.

3.42 One respondent contends that the basis for the contributions should be distance from the tram stops alone, not from the line itself. I am not aware of any specific response from the council on this question. For my part, I would have thought that distance to specific stops, rather than to the line more generally, would be the more obvious indicator of a site's accessibility (and likely use of) the tram network, albeit I would acknowledge that the vicinity of the line itself (and of trams passing along it) would serve as an obvious reminder of this travel choice.

3.43 The Scottish Property Federation does not agree with the approach to tram contributions (set out in paragraph F of page 7 of the supplementary guidance) from major developments outwith the defined tram contribution zones. I find the wording of that paragraph to be a little opaque, but the general principle that every such proposal should be considered, in respect of its impacts on the tram system, on its merits would appear to be a reasonable one.

3.44 It is also argued that, for developments close to tram stops, requirements to support other transport infrastructure should be reduced accordingly, due to the higher proportion of trips generated by that development using (and due to the additional need to contribute towards the cost of) the tram network. However that seems to me to be a matter which could be considered through individual transport assessments.

3.45 On matters of detail, I note that the supplementary guidance identifies the need for contributions based on various distances to tram stops/line, the type of development and its scale. I have not seen detailed comments seeking to call into question the basis for this approach, but on the other hand I have not seen the evidence from the council in support of it – for example how the location, scale and type of development (and the cost of the tram line itself) has informed the assessment of the levels of contributions required. I do not assert that the approach taken cannot be justified, but simply that detailed evidence for this is not to be found in the transport appraisals.

## **4 HEALTHCARE CONTRIBUTIONS**

4.1 I record above that I do not see a strong basis in the local development plan for the inclusion of cumulative contribution zones for healthcare infrastructure in the supplementary guidance. Despite that conclusion, I consider below some of the other issues raised by respondents in relation to healthcare contributions.

### **The principle of developer contributions for healthcare infrastructure**

4.2 Homes for Scotland and other respondents argue, in principle, against the notion of developer contributions towards healthcare facilities. It is stated that the National Health Service is funded by central government and so it is not appropriate to seek developer contributions and that the council cannot control delivery of services provided by the National Health Service and/or private businesses.

4.3 I note, however, that the principle of healthcare contributions was, to some degree, considered through the local development plan examination process (Issues 21 and 23). Paragraph 145 of the plan concedes that 'whilst it may be appropriate to seek contributions for such provision any requirement would need to be considered on a case by case basis where a clear justification can be provided in the context of Circular 3/2012'. Policy Hou 10 provides that 'planning permission for housing development will only be granted where there are associated proposals to provide any necessary health and other community facilities relative to the impact and scale of development proposed', thereby providing a planning purpose for the provision of healthcare facilities.

4.4 Therefore it seems to me that the question is not whether, in principle, it can be appropriate for developer contributions to be made towards healthcare infrastructure (the local development plan would seem to establish that it could be) but whether the approach proposed by the council in the supplementary guidance is justified. Again, I do not seek to respond to site-specific matters given the lack of detailed evidence which I have about these.

### **The evidence base**

4.5 As with the other categories of infrastructure actions, respondents contend that there is insufficient justification for the new and extended facilities which are said to be required, with a lack of evidence to show why new capacity is required, to justify the costs for these set out in the guidance and to explain the basis for the proportion of these costs to come from developer contributions. There are also criticisms of the zonal approach taken, as general practices are said to have no fixed catchment area boundaries. Respondents also state that there should be no contribution of payments towards facilities run by what are essentially private businesses.

4.6 Although, again, there is not a detailed justification for the proposed approach in the supplementary guidance itself, I have had regard to the council's primary care appraisal.

4.7 The appraisal describes a situation where there is now a requirement in Edinburgh for new and expanded healthcare facilities since all the available capacity has been used up but the city continues to expand with new housing development. More and more practices have been closing their lists to new patients due to capacity issues. The appraisal also explains how, in recent years, short term measures have been put in place to make

incremental, generally small improvements to facilities to increase capacity, and with funding having been made available for this. However this is seen as a temporary measure and, whilst the appraisal shows the ongoing measures being taken to make the most out of the existing estate, more significant investment is needed to accommodate future housing development.

4.8 I have no reason to doubt the veracity of what is stated in the appraisal in setting out this context. It appears to me to demonstrate that a pragmatic approach has been taken to making the most out of existing infrastructure, but there is now a broad view amongst the healthcare agencies and providers involved that more significant investment is needed to accommodate the substantial amounts of development supported in the local development plan.

4.9 The supplementary guidance states clearly that any developer contributions would only be required to accommodate patients from new developments, not to resolve pre-existing capacity constraints. But it would have been better had the appraisal provided a more quantitative analysis to demonstrate why it is the case that the existing suite of healthcare facilities cannot accommodate the development proposed in the plan, and therefore why new capacity is required. It is asserted that this is the case, and the qualitative and narrative information in the appraisal would seem to bear this out, but I can understand why landowners and developers would want to see more a quantitative, geographically disaggregated analysis of the position to better demonstrate why, in each area, new development will require new infrastructure. The supplementary guidance says that existing local practice catchment areas and capacity were reviewed to assess what available capacity existed before identifying what new infrastructure is required for new development. But the appraisal does not provide the detail of that analysis, instead focussing more on what has been decided must be done as a result of it.

4.10 Setting that point aside, I discuss below the more detailed coverage of each of the four broad zones for healthcare provision identified in the appraisal and the guidance, and the justification for the approaches proposed there. For each, the number of new patients is calculated at 2.1 per dwelling, based on data on average household sizes. Albeit that, as Forth Ports points out, flats and studio apartments may have smaller numbers of residents, it does not appear to me unreasonable to proceed on the basis of an average household size. On the other hand it is stated in the appraisal that actual population increases would be higher if the new developments include (as would seem likely) family housing, but not what the response would be if this is the case.

4.11 For **North West Edinburgh**, based on the 2016 housing land audit, the table 'Housing Land Audit and Delivery Programme 2016 in the appraisal shows expected population (and therefore new patients) from new development of around 7,000 between 2016 and 2021 and a further 7,000 between 2021 to 2026.

4.12 The supplementary guidance identifies 5 infrastructure actions (11-15 in the table on page 56/57) for this zone – 3 new practices, one extension and one refurbishment. The total number of patients supported by these actions is 28,000, and the whole cost of these are to be from development. This is twice the number of new patients forecast by 2026 in the table in the appraisal. The costs per dwelling range from £105 per dwelling for Parkgrove to £1,050 in West Edinburgh, based on the anticipated costs of each of the actions identified.

4.13 The map on page 61 of the supplementary guidance shows the extent of the contribution zones, within which contributions would be required at the rates set out in the guidance.

4.14 For **North East Edinburgh**, the table in the appraisal shows expected population from new development of around 8,000 between 2016 and 2021 and a further 4,500 between 2021 to 2026.

4.15 The supplementary guidance identifies 5 infrastructure actions (1-5 in the table on page 56/57) for this zone – 4 new practices and one small scheme across 2 existing practices. The total number of patients supported by these actions is 43,500, of which 19,500 are from (and to be paid for by) new development. It is not clear to me why this is significantly larger than the number of new patients forecast by 2026 in the table in the appraisal. The costs per dwelling are £945 for the new practices, and only £60 per dwelling for the small scheme.

4.16 The map on page 58 of the supplementary guidance shows the extent of the 5 contribution zones.

4.17 For **South East Edinburgh** the table in the appraisal shows expected population from new development of around 4,200 between 2016 and 2021 and a further 3,100 between 2021 to 2026.

4.18 The supplementary guidance identifies 2 infrastructure actions (6 & 7 in the table on page 56/57) for this zone – 1 new practice and 1 'reprovision of existing premises'. The total number of patients supported by these actions is 12,000, of which 7,000 are from (and to be paid for by) new development. This is consistent with the number of new patients forecast by 2026 in the table in the appraisal. The costs per dwelling are £945 for the new practices, and only £60 per dwelling for the small scheme.

4.19 The map on page 59 of the supplementary guidance shows the extent of the 2 contribution zones.

4.20 For **South West Edinburgh** the table in the appraisal shows expected population from new development of around 4,500 between 2016 and 2021 and a further 1,700 between 2021 to 2026.

4.21 The supplementary guidance identifies 3 infrastructure actions (8-9 in the table on page 56/57) for this zone – 1 new practice and 2 extensions. The total number of patients supported by these actions is 21,000, of which 4,500 are from (and to be paid for by) new development. This is less than the number of new patients forecast by 2026 in the table in the appraisal. The costs per dwelling are £945 for the new practices, and only £60 per dwelling for the small scheme.

4.22 The map on page 50 of the supplementary guidance shows the extent of the 3 contribution zones.

4.23 It is not clear to me why the forecast numbers of new patients from development in each broad zone in the tables in the appraisal do not tally consistently with the stated total numbers of new patients from new developments by 2026 (and from which contributions would be required) in the table on pages 56/57 of the supplementary guidance. For the

broad North West and North East zones the latter number is higher, for the South West it is lower, for the South East the figures match fairly well.

4.24 It may have been in the interests of clarity (so that the basis of the contributions could be more readily understood) if the same tables in the appraisal (and/or the supplementary guidance itself) had listed which development sites would be required to make contributions towards each of the actions listed. Although 4 broad zones are set out, one for each sector of the city, in fact the contributions are levied towards (and therefore the sums for these are dependent on the costs of) each specific infrastructure intervention.

### **Catchment areas**

4.25 The supplementary guidance states that the healthcare contribution zones have not been defined on the basis of individual catchments since practice boundaries have no statutory status, and because they overlap. However by defining areas for each particular action and for contributions (see the maps on pages 58-61 of the guidance) the supplementary guidance links each development site to one infrastructure action only. So, in effect, this defines clear (not overlapping) boundaries for these, some of which are fairly close to each other - for example zones 1-3 in Leith/Granton, 4 & 5 at Craigmillar/Brunstane, 14 & 15 at Muirhouse/Crewe and 12 & 13 at Parkgrove/East Craigs/West Edinburgh.

4.26 Since it is acknowledged in the supplementary guidance that, in reality, catchments are not discrete and do overlap, it would have been helpful for more information to have been provided to justify this approach to the catchment areas. This is the case because, for example, the per unit contribution required for the West Edinburgh zone is 10 times the amount required at the nearby Parkgrove zone, and the contribution for the Niddrie action is more than 15 times that required for the nearby Brunstane action. Related to this, I also note that the appraisal raised the prospect (paragraphs 4.6 and 4.7) of rationalisation of current catchments with the potential for overlapping boundaries.

### **Costs**

4.27 In respect of the actual costs per action identified in the supplementary guidance, the appraisal says that, as a guide, each 1,000 patients would require approximately 90m<sup>2</sup> of floorspace. Section 5 of the appraisal outlines estimated costs:

- Costs for small and intermediate schemes (£0.01m to £0.1m) based on recent developments of this scale.
- Intermediate schemes (£0.1m to £0.5m) based on recent developments of this scale.
- Refurbishment/re-design (£0.5m to £1.2m).
- New build – indicative costs based on Scottish Futures Trust metrics.

4.28 As a crude rule of thumb, it is stated that the cost of provision could be estimated at £500k per 1000 patients. Although it is acknowledged that actual costs will vary from action to action (which presumably could be reflected in any Section 75 agreements ultimately signed) the guidance does therefore seem to provide costs and contributions which are based on reasonable assumptions for each type of action.

## **Developer contributions for private businesses/practices**

4.29 On page 11 of the supplementary guidance it is explained that:

'The Public Bodies (Joint Working) Scotland Act 2014 requires health boards and local authorities to integrate health and social care services. In Edinburgh, the integration of the services from City of Edinburgh Council and NHS Lothian is now under the authority of the Edinburgh Integration Joint Board (IJB). The planning, resources and operational oversight for the range of NHS and local authority care services, including primary care, is the responsibility of the Edinburgh Health and Social Care Partnership (EHSCP), which is governed by the Edinburgh IJB.

The majority of the current 72 practices in Edinburgh are independent contractors, with eight directly managed by EHSCP/NHS Lothian. Irrespective of whether they are independent contractors or directly managed, EHSCP work with all GPs to plan future primary care provision and develop healthcare actions in response to the implications of the LDP.'

4.30 To the patient, it would seem to matter little whether their primary healthcare provider is a private practice or not, since all the practices are delivering NHS services. The appraisal explains that some practices have closed lists in recent years, and narrates a process whereby incremental improvements and extensions have been made to practice facilities over the years in order to boost capacity and accommodate new patients. I get no sense that this is an environment where a practice is likely to be able or to want, in response to new development, to raise capital so as to extend a facility in order to take on the resultant new patients. I am not convinced these differences across the city in the status of practices should affect the ability to seek developer contributions.

## **5. CONCLUSIONS**

5.1 I return at this point to the three matters I was asked to report on

### **The consultation undertaken to date, and the way that views have been taken into account by the City of Edinburgh Council.**

5.2 I have set out in the sections above the main issues raised in the consultation responses to the draft supplementary guidance, and my own views on these. The list of proposed changes to the draft version shows that the council made various amendments in response to the consultations received. Changes relate, amongst other things, to the information on the costs of some of the interventions, a further explanation for the basis of the approach to healthcare contributions and the removal of the transport contribution zones in north Edinburgh.

5.3 But the main observation I would make is that, as can be seen from my comments above, there are many questions raised about the evidence and justification for the approach in the supplementary guidance which, to my mind and on the basis of the evidence I have examined, remain unanswered. If there is further evidence for the approach taken, beyond the appraisals and the local development plan itself, then I have not seen it. It may be the case that this fuller evidence in support of the contributions being sought would be provided at the planning application stage, before section 75 agreements are made. But I would have expected to see more of the evidence in support of the supplementary guidance itself, since this will be the basis for any cumulative contributions which are required.

### **The methodology used to calculate contributions for education infrastructure.**

5.4 I cover this matter in chapter 2 above. In summary, in my view neither the supplementary guidance or the appraisal provide the kind of detailed evidence for the approach to cumulative education contributions which I would expect interested developers and landowners would wish to examine, or to allow full scrutiny of the approach to the calculations. This applies in relation to identifying the contribution to school capacity issues from new development and then justifying the approach to be taken in each contribution zone.

### **Compliance of the supplementary guidance with Circular 3/2012.**

5.5 I note below what seem to me to be the key elements of the circular, which sets out the circumstances in which planning obligations can be used, in relation to the supplementary guidance. Paragraphs 30 to 35 of the circular explain the role of plan-led approach in relation to planning obligations.

5.6 The circular requires that broad principles for planning obligations, including the items for which contributions will be sought and the occasions when they will be sought, are set out in the development plan.

5.7 The local development plan envisages that there may be a need for contributions towards all of the types of infrastructure which are covered in the supplementary guidance. However, and as I note above, I do not think that the plan provides a strong basis for the

inclusion of cumulative contribution zones for healthcare infrastructure in the supplementary guidance.

5.8 The circular states that methods and exact levels of contributions should be included in statutory supplementary guidance. Where planning authorities propose to rely on standard charges and formulae, they should include these in supplementary guidance along with information on how standard charges have been calculated, how monies will be held, how they will be used and, if applicable, how they will be returned to the developer.

5.9 Although there are gaps for some contribution zones (which I presume would need a further iteration of the supplementary guidance to resolve), on the face of it the supplementary guidance does, where contribution rates are given, provide exact levels of contributions. I do note however that the costs of some of the various infrastructure interventions are subject to further confirmation, and this could affect the level of the contributions which are ultimately required from a development.

5.10 In respect of 'methods' for the cumulative contributions, notwithstanding my comments above about the evidence and justification for some of these and about the approach taken in each case, the supplementary guidance sets out an approach for each of the different types of infrastructure (the approach to any contributions towards public realm infrastructure would need a further iteration of the guidance). Standard charges to be applied are set out in the supplementary guidance, although not for all zones where, again, a further iteration of the guidance would be required rather than seeking to amend/provide these through the action programme. The supplementary guidance provides information about how monies will be held and how they may be used, and it says that planning obligations can make provision for the repayment of unused contributions if the actual costs of delivering infrastructure are lower than anticipated.

5.11 I am doubtful though, about the extent to which the supplementary guidance can be said to fulfil an expectation that it include sufficient information about how these standard charges have been calculated. As I note in the chapters above, I do not think that even the appraisals provide this. Likewise, I have not seen sufficient evidence that I can say with confidence that the approaches applied in the guidance will reflect the actual impacts of, and be proportionate to, the developments in question, as required by paragraph 33 of the circular.

5.12 In relation to the 5 tests for planning obligations set out in the circular, I have set out above my significant concerns about whether the supplementary guidance fully demonstrates that any contributions in planning obligations based upon it would be necessary to make proposed developments acceptable in planning terms and whether the scale of the contribution would fairly and reasonably relate to the development in question. I do not think that it does.

T: 0131-244 7547  
E: [chief.planner@gov.scot](mailto:chief.planner@gov.scot)

Karen Heywood  
Acting Chief Reporter  
DPEA  
By email: [Karen.Heywood@gov.scot](mailto:Karen.Heywood@gov.scot)

Our ref: A22831020

29 November 2018

Dear Karen

**The City of Edinburgh Council  
Supplementary Guidance on Developer Contributions and Infrastructure Delivery**

On 7 September 2018 the City of Edinburgh Council certified notice of their intention to adopt the Supplementary Guidance on Developer Contributions and Infrastructure Delivery. This document relates to infrastructure provision in our capital city and contributions towards its costs. As such, this is a significant matter, requiring comprehensive consideration before a decision can be made on whether or not the Scottish Ministers wish to intervene.

To inform this decision, the Minister for Local Government, Housing and Planning has asked me to instruct DPEA to prepare and submit a report, if possible before 8 February 2019, setting out:

- The consultation undertaken to date, and the way that views have been taken into account by the City of Edinburgh Council;
- The methodology used to calculate contributions for education infrastructure; and
- Compliance of the supplementary guidance with Circular 3/2012.

Officials in my team will provide you with the relevant background information they hold on the supplementary guidance. I would be grateful if you could keep them informed if there are any issues arising from the timescale set out above.

Many thanks for your assistance.

**John McNairney**  
Chief Planner

Victoria Quay, Edinburgh EH6 6QQ  
[www.gov.scot](http://www.gov.scot)



---

**APPENDIX 5 – HERIOT-WATT EMPLOYEE INFORMATION**



# **Heriot-Watt University Employee Information**

**April 2019**

## Contents

List of Tables .....	3
1. Introduction and context.....	5
2. Additional Notes .....	6
3. Employee Profile by Protected Characteristic Groups .....	7
4. Employee Profile – Academic, Professional Services, Full/Part Time Staff, Absence Returners.....	10
5. Heriot-Watt University Employee Profile – Training, Development, Progression and Promotion ....	13
6. Heriot-Watt University Employee Profile – Grievance, Disciplinary, Dismissals.....	17
7. Heriot-Watt University – Recruitment: Applicants and Accepted roles by Grade, Academic, Professional Services and Protected Characteristic 1st August 2017 to 31st July 2018. * <i>Scottish Campuses only</i> .....	18
i. Applicants .....	18
ii. Accepted .....	19
8. Heriot-Watt University – Composition of influential committees 2017-2019 .....	20

## List of Tables

Table 1: Overall Staff Profile by Protected Characteristic: Campus location and age .....	7
Table 2: Overall Staff Profile by Protected Characteristic: Campus location and disability.....	7
Table 3: Overall Staff Profile by Protected Characteristic: Campus location and ethnicity .....	8
Table 4: Overall Staff Profile by Protected Characteristic: Campus location and gender.....	8
Table 5: Overall Staff Profile by Protected Characteristic: Campus Location and religion & belief.....	8
Table 6: Overall Staff Profile by Protected Characteristic: Campus location and gender identity* Scottish Campuses only.....	9
Table 7: Overall Staff Profile by Protected Characteristic: Campus location and sexual orientation* Scottish Campuses only .....	9
Table 8: Overall Staff Profile by Protected Characteristic: Campus location and marital status .....	9
Table 9: Overall Staff Profile by campus locations and job family (academic and professional services employees) .....	10
Table 10: Overall Staff Profile by campus location, disability and full time/part time status*Scottish campuses only .....	10
Table 11: Overall Staff Profile by campus location, ethnicity and full time/part time status*Scottish campuses only .....	11
Table 12: Overall Staff Profile by campus location, gender and full time/part time status* Scottish campuses only .....	11
Table 13: Women returning to work after maternity leave.....	12
Table 14: disabled employees returning to work after disability related absence.....	12
Table 15: Employees undertaking PDR 2016-17 by campus location .....	13
Table 16: Employees undertaking PDR 2016-17 by gender .....	13
Table 17: Employees undertaking PDR 2016-17 by ethnicity.....	13
Table 18: Employees undertaking PDR 2016-17 by academic and professional service roles.....	13
Table 19: Participation in academic learning and development by gender 2016-17 .....	14
Table 20: Participation in academic learning and development by gender 2017-18 .....	14
Table 21: Participation in Aurora (headcount), 2013-15 – 2016-19.....	14
Table 22: Contribution Board cases received 2017-18 , by gender, full/part time academic and professional services staff covering all grades* Scottish campuses .....	15
Table 23: Professional Services Regradings by Gender 2017-18* Scottish campuses.....	15
Table 24: Academic Advancement Board by gender 2017-18* Scottish campuses .....	15
Table 25: Academic promotion success rates by gender and grade 2013-18* Scottish campuses.....	16
Table 26: Grievance (including harassment) information by school (by PC – gender, ethnicity and disability) 1 January 2018 - 31 December 2018 * Scottish Campuses only .....	17
Table 27: Disciplinary action (including harassment) (by PC – gender, ethnicity and disability) 1 January 2018 - 31 December 2018 * Scottish Campuses only .....	17
Table 28: Dismissals (by PC – gender, ethnicity and disability) 1 January 2018 - 31 December 2018* Scottish Campuses only .....	17
Table 29: Other reasons for leaving (by PC – gender, ethnicity and disability) 1 January 2018 - 31 December 2018 *Scottish Campuses only .....	17
Table 30: Applicants: Academic and Professional Service Roles by gender.....	18
Table 31: Applicants - Academic and Professional Service roles by ethnicity.....	18

Table 32: Applicants- Academic and Professional Service roles by disability .....	18
Table 33: Recruitment: Academic and Professional Service Roles by gender .....	19
Table 34: Recruitment - Academic and Professional Service roles by ethnicity .....	19
Table 35: Recruitment- Academic and Professional Service roles by disability .....	19
<i>Table 36: University Court Gender Profile .....</i>	<i>20</i>
<i>Table 37: University Court Ethnicity Profile .....</i>	<i>20</i>
Table 38: University Senate .....	20
Table 39: University Executive – BAME composition .....	20
Table 40: University Executive - gender composition .....	20
Table 41: University Committee of Learning and Teaching: gender composition .....	21
Table 42: University Committee of Research and Innovation – BAME composition .....	21
Table 43: University Committee of Research and Innovation – gender composition .....	21
<i>Table 44: Professional Services Leadership Board – BAME composition.....</i>	<i>21</i>
Table 45: Professional Services Leadership Board - gender composition .....	21

# Employee Information 2019

## 1. Introduction and context

Heriot-Watt University is publishing data in line with our employee information data requirements under the Equality Act 2010. Following guidance published by the Equality and Human Rights Commission, '*Employee Information and the Public Sector Equality Duty: A guide for public authorities in Scotland*'<sup>1</sup> our publishing is aligned with the recommendation (p14) to cover the following areas:

- Recruitment
- Promotion
- Pay and Remuneration
- Training and Development
- Return after maternity leave
- Return to work of disabled employees following sick leave relating to their disability
- Appraisal
- Grievances (including about harassment)
- Disciplinary action (including for harassment)
- Dismissals and other reasons for leaving

We are presenting high level data on the protected characteristics of our staff groups. At this stage our protected characteristic reporting focuses on gender, ethnicity and disability.

Our aim is to create data sets that enable all our requirements to be met through one process. The data produced sets the ground work for future activities that will analyse the intersectionality of protected characteristics and tell us more about who makes up our staff community.

---

<sup>1</sup> [www.equalityhumanrights.com/en/publication-download/employee-information-and-public-sector-equality-duty-guide-public-authorities](http://www.equalityhumanrights.com/en/publication-download/employee-information-and-public-sector-equality-duty-guide-public-authorities)

## 2. Additional Notes

- All staff refers to staff across the University including Edinburgh Business School and our Dubai and Malaysia Campuses. The data does not include casual staff. %s are subject to rounding.
- Each table clearly states the time frame for the data presented.
- *\*indicates where data is unavailable at time of publication.*
- Data presented based on all staff to preserve anonymity.
- Pay and remuneration (by gender, ethnicity and disability) is contained under separate cover within the Heriot-Watt University Equal Pay Statement 2017-21 and the April 2019 Equality Pay Information publication found at [www.hw.ac.uk/services/equality-diversity/legal-requirements.htm](http://www.hw.ac.uk/services/equality-diversity/legal-requirements.htm)
- **Where the tables refer to a very small number of individuals, totals have been omitted or aggregated to avoid the risk of identification, in line with the Information Commissioner's Office Anonymisation Code of Practice <https://ico.org.uk/media/1061/anonymisation-code.pdf>**
- **Where data refers to a unit of 5 or less we have replaced the figure with <5 in the number column/row and N/A in the percentage column/row to ensure anonymity.**
- **Due small numbers we have been unable to produce for publication data referring to grievance (including harassment), disciplinary action (including harassment, dismissals or other reasons for leaving). The information is held internally and requests to use the data will be responded to on a case by case basis.**

### 3. Employee Profile by Protected Characteristic Groups

- Total Staff after removing duplicates across all campuses: 2258
- Total UK based staff: 1916
- 31 December 2018 census date unless stated

Table 1: Overall Staff Profile by Protected Characteristic: Campus location and age

	Scottish campuses		Dubai		Malaysia	
	No.	%	No.	%	No.	%
<b>25 years and under</b>	86	4%	<5	N/A	10	4%
<b>26-30</b>	149	8%	11	10%	36	16%
<b>31-35</b>	270	14%	16	14%	57	25%
<b>36-40</b>	294	15%	21	18%	54	24%
<b>41-45</b>	210	11%	24	21%	32	14%
<b>46-50</b>	246	13%	15	13%	24	11%
<b>51-55</b>	260	14%	12	11%	9	4%
<b>56-60</b>	245	13%	<5	N/A	<5	N/A
<b>61-65</b>	101	5%	7	6%	<5	N/A
<b>66 years &amp; older</b>	55	3%		0%		0%
<b>Grand Total</b>	1916	100	114	100	228	100

Table 2: Overall Staff Profile by Protected Characteristic: Campus location and disability

	Scottish campuses		Dubai		Malaysia	
	No.	%	No.	%	No.	%
<b>Information refused</b>	<5	N/A		0%	<5	N/A
<b>Known disability</b>	49	3%	<5	N/A	<5	N/A
<b>No known disability</b>	29	2%	6	5%	<5	N/A
<b>Not known</b>	1837	96%	107	94%	228	100%
<b>Grand Total</b>	1916	100%	114	100%	228	100%

Table 3: Overall Staff Profile by Protected Characteristic: Campus location and ethnicity

	Scottish campuses		Dubai		Malaysia	
	No.	%	No.	%	No.	%
<b>BME</b>	185	10%	53	46%	211	93%
<b>Information refused</b>	117	6%		0%		0%
<b>Not known</b>	128	7%	31	27%	10	4%
<b>White</b>	1486	78%	30	26%	7	3%
<b>Grand Total</b>	1916	100%	114	100%	228	100%

Table 4: Overall Staff Profile by Protected Characteristic: Campus location and gender

	Scottish campuses		Dubai		Malaysia	
	No.	%	No.	%	No.	%
<b>Female</b>	901	47%	51	45%	133	58%
<b>Male</b>	1015	53%	63	55%	95	42%
<b>Grand Total</b>	1916	100%	114	100%	228	100%

Table 5: Overall Staff Profile by Protected Characteristic: Campus Location and religion & belief

	Scottish campuses		Dubai		Malaysia	
	No.	%	No.	%	No.	%
<b>No religion</b>	339	18%	<5	N/A	<5	N/A
<b>Buddhist</b>	6	0%	<5	N/A	<5	N/A
<b>Christian - Church of Scotland</b>	185	10%	<5	N/A	<5	N/A
<b>Christian - Roman Catholic</b>	85	4%	<5	N/A	<5	N/A
<b>Christian - other denomination</b>	73	4%	<5	N/A	<5	N/A
<b>Hindu</b>	<5	N/A	<5	N/A	<5	N/A
<b>Muslim</b>	6	0%	10	9%	<5	N/A
<b>Sikh</b>	<5	N/A	<5	N/A	<5	N/A
<b>Spiritual</b>	6	0%	<5	N/A	<5	N/A
<b>Any other religion - or belief</b>	16	1%	<5	N/A	<5	N/A
<b>Information refused</b>	1046	55%	80	70%	196	86%
<b>Unknown</b>	149	8%	10	9%	32	14%
<b>Grand Total</b>	1916	100%	114	100%	228	100%

Table 6: Overall Staff Profile by Protected Characteristic: Campus location and gender identity\* Scottish Campuses only

Question: Is your gender identity the same as the gender you were originally assigned at birth?

	Scottish Campuses	
	No.	%
<b>Yes</b>	1747	91%
<b>No</b>	<5	N/A
<b>Information refused</b>	17	1%
<b>Unknown</b>	149	8%
<b>Grand Total</b>	1916	100%

Table 7: Overall Staff Profile by Protected Characteristic: Campus location and sexual orientation\* Scottish Campuses only

	Scottish Campuses	
	No.	%
<b>Bisexual</b>	13	1%
<b>Gay man</b>	13	1%
<b>Gay woman/lesbian</b>	<5	N/A
<b>Heterosexual</b>	702	37%
<b>Other</b>	<5	N/A
<b>Information refused</b>	1035	54%
<b>Unknown</b>	149	8%
<b>Grand Total</b>	1916	100%

Table 8: Overall Staff Profile by Protected Characteristic: Campus location and marital status

	Scottish campuses		Dubai		Malaysia	
	No.	%	No.	%	No.	%
<b>Civil Partnered</b>	<5	N/A	<5	N/A	<5	N/A
<b>Co-habiting</b>	93	5%	<5	N/A	<5	N/A
<b>Divorced</b>	42	2%	<5	N/A	<5	N/A
<b>Married</b>	850	44%	72	63%	109	48%
<b>Unknown</b>	454	24%	19	17%	40	18%
<b>Other</b>	35	2%	2	2%		0%
<b>Prefer not to answer</b>	53	3%	<5	N/A	<5	N/A
<b>Separated</b>	19	1%	<5	N/A	<5	N/A
<b>Single</b>	263	14%	9	8%	79	35%
<b>Undisclosed</b>	85	4%	11	10%	<5	N/A
<b>Widow/Widower</b>	17	1%	<5	N/A	<5	N/A
<b>Grand Total</b>	1916	100%	114	100%	228	100%

#### 4. Employee Profile – Academic, Professional Services, Full/Part Time Staff, Absence Returners

Table 9: Overall Staff Profile by campus locations and job family (academic and professional services employees)

		Scotland	Dubai	Malaysia
<b>TOTAL NUMBER OF STAFF</b> (Total: 2258)	Number	1916	114	228
	% of total staff	85	<5	N/A
<b>Academic</b> (t.1001)	Number	796	82	123
	%	80	8	12
<b>Professional Services</b> (t. 1257)	Number	1120	32	105
	%	89	<5	N/A

Table 10: Overall Staff Profile by campus location, disability and full time/part time status\*Scottish campuses only

	Scottish campuses	
	No.	%
<b>Full time Information refused</b>	<5	N/A
<b>Full time Known disability</b>	40	2%
<b>Full time No known disability</b>	18	1%
<b>Full time Not known</b>	1412	74%
<b>Part Year Worker Known disability</b>	<5	N/A
<b>Part Year Worker No known disability</b>	<5	N/A
<b>Part Year Worker Not known</b>	27	1%
<b>Part time Known disability</b>	8	0%
<b>Part time No known disability</b>	10	1%
<b>Part time Not known</b>	398	21%
<b>Grand Total</b>	1916	100%

Table 11: Overall Staff Profile by campus location, ethnicity and full time/part time status\*Scottish campuses only

	Scottish campuses	
	No.	%
<b>Full time BME</b>	156	8%
<b>Full time Information refused</b>	99	5%
<b>Full time Not known</b>	92	5%
<b>Full time White</b>	1124	59%
<b>Part Year Worker Information refused</b>	<5	N/A
<b>Part Year Worker Not known</b>	<5	N/A
<b>Part Year Worker White</b>	26	1%
<b>Part time BME</b>	29	2%
<b>Part time Information refused</b>	17	1%
<b>Part time Not known</b>	34	2%
<b>Part time White</b>	336	18%
<b>Grand Total</b>	1916	100%

Table 12: Overall Staff Profile by campus location, gender and full time/part time status\* Scottish campuses only

	Scottish campuses	
	No.	%
<b>Full time</b>	1471	77%
<b>Part Year Worker Male</b>	22	1%
<b>Part Year Worker Female</b>	7	0%
<b>Part time Male</b>	110	6%
<b>Part time Female</b>	306	16%
<b>Grand Total</b>	1916	100%

*Table 13: Women returning to work after maternity leave*

*Not available at publication - will be included in due course*

*Table 14: disabled employees returning to work after disability related absence*

*Not available at publication - will be included in due course*

## 5. Heriot-Watt University Employee Profile – Training, Development, Progression and Promotion

PDR uptake percentages based on numbers completing rather than total employees. Latest figures cover 2017.

Table 15: Employees undertaking PDR<sup>2</sup> 2016-17 by campus location

Completion by campus location	2016	2017
Scottish Campuses	70%	63%
Dubai Campus	64%	50%
Malaysia Campus	65%	74%

Table 16: Employees undertaking PDR 2016-17 by gender

Completion by gender	2016	2017
Men completing	52%	52%
Women completing	48%	48%

Table 17: Employees undertaking PDR 2016-17 by ethnicity

Completion by Ethnicity	2016	2017
White	71%	*
BAME	18%	*
Unknown	7%	*
Refuse to answer	5%	*

\* Difficulties with data for 2017 relating to ethnicity at time of publication.

Table 18: Employees undertaking PDR 2016-17 by academic and professional service roles

Completion by academic/professional services	2016	2017
Academic staff completing	48%	47%
Professional services completing	52%	53%

Table 19: Participation in academic learning and development by gender 2016-17

Course	Male (individuals)	Male (attendances)	Female (individuals)	Female (attendances)	Total (individuals)	Total (attendances)
Research Futures	50	111	22	69	72	180
Scottish Crucible	12	Not available	17	Not available	29	Not available
Public Engagement	40	48	45	74	86	123
PG CAP	30	302	22	225	52	527
L&T Enhancements	38	53	28	37	67	91
Academic CPD	17	50	32	67	50	118

Table 20: Participation in academic learning and development by gender 2017-18

Course	Male (individuals)	Male (attendances)	Female (individuals)	Female (attendances)	Total (individuals)	Total (attendances)
Research Futures	161	230	82	127	243	357
Scottish Crucible	18	N/A	15	N/A	33	N/A
Public Engagement	N/A	N/A	N/A	N/A	N/A	269
PCGAP	23	N/A	29	N/A	52	N/A

Table 21: Participation in Aurora (headcount), 2013-15 – 2016-19

	2013-15		2016-19	
	Number	%	Number	%
Academic	24	43%	22	43%
Professional Services	32	57%	29	57%
<b>Total</b>	56	100%	51	100%

Table 22: Contribution Board cases received 2017-18 , by gender, full/part time academic and professional services staff covering all grades\* Scottish campuses

	2017				2018			
	Female		Male		Female		Male	
	Full time	Part time						
<b>Academic</b>	8	<5	13	<5	7	<5	26	<5
<b>Professional Services</b>	15	6	12	<5	24	<5	14	<5
<b>Total</b>	23	6	25	<5	31	6	40	<5

Table 23: Professional Services Regradings by Gender 2017-18\* Scottish campuses

	2017		2018	
	Female	Male	Female	Male
<b>Number of cases</b>	14	<5	16	<5
<b>Number promoted</b>	10	<5	12	<5
<b>Success rate</b>	71%	80%	75%	80%

Table 24: Academic Advancement Board by gender 2017-18\* Scottish campuses

	2017					2018				
	Grade 6		Grade 7		Total	Grade 6		Grade 7		Total
	Female	Male	Female	Male		Female	Male	Female	Male	
<b>Number of cases</b>	<5	<5	13	11	27	<5	<5	9	13	25
<b>Number promoted</b>	<5	<5	9	8	20	<5	<5	9	10	22
<b>% Success</b>		100%	69%	73%	74%	100%	100%	100%	77%	88%

Table 25: Academic promotion success rates by gender and grade 2013-18\* Scottish campuses

	Female		Male			Female %	Male %
	Applied	Successful	Applied	Successful		Success rate	Success rate
<b>Grade 8</b>	7	4	11	7		57%	64%
	9	6	16	9		67%	56%
	<5	<5	7	<5		100%	43%
	9	<5	6	5		33%	83%
	13	9	11	8		69%	73%
	9	9	13	10		100%	77%
<b>Grade 9</b>	11	7	16	12		64%	75%
	13	10	16	8		77%	50%
	<5	<5	18	12		75%	67%
	7	5	12	8		71%	67%
	12	9	22	13		75%	59%
	10	10	17	14		100%	82%
<b>Grade 10</b>	<5	<5	<5	<5		100%	40%
	<5	<5	8	<5		100%	63%
	<5	<5	7	<5		75%	57%
	<5	<5	7	<5		0%	71%
	7	6	10	<5		86%	50%
	<5	<5	12	7		50%	58%
<b>Total</b>	20	13	32	21		65%	66%
	25	18	40	22		72%	55%
	11	9	34	21		82%	62%
	11	8	26	19		73%	73%
	32	24	43	26		75%	60%
	23	21	42	31		91%	74%

## 6. Heriot-Watt University Employee Profile – Grievance, Disciplinary, Dismissals

*Table 26: Grievance (including harassment) information by school (by PC – gender, ethnicity and disability) 1 January 2018 - 31 December 2018 \* Scottish Campuses only*

Held internally – not for publication as per the Information Commissioner’s Office Anonymisation Code of Practice <https://ico.org.uk/media/1061/anonymisation-code.pdf>

*Table 27: Disciplinary action (including harassment) (by PC – gender, ethnicity and disability) 1 January 2018 - 31 December 2018 \* Scottish Campuses only*

Held internally – not for publication as per the Information Commissioner’s Office Anonymisation Code of Practice <https://ico.org.uk/media/1061/anonymisation-code.pdf>

*Table 28: Dismissals (by PC – gender, ethnicity and disability) 1 January 2018 - 31 December 2018\* Scottish Campuses only*

Held internally – not for publication as per the Information Commissioner’s Office Anonymisation Code of Practice <https://ico.org.uk/media/1061/anonymisation-code.pdf>

*Table 29: Other reasons for leaving (by PC – gender, ethnicity and disability) 1 January 2018 - 31 December 2018 \*Scottish Campuses only*

Held internally – not for publication as per the Information Commissioner’s Office Anonymisation Code of Practice <https://ico.org.uk/media/1061/anonymisation-code.pdf>

7. Heriot-Watt University – Recruitment: Applicants and Accepted roles by Grade, Academic, Professional Services and Protected Characteristic 1st August 2017 to 31st July 2018. *\*Scottish Campuses only*

i. Applicants

Table 30: Applicants: Academic and Professional Service Roles by gender

		No of applicants 1766 Gender		
		Male	Female	Unknown
<b>Academic (t.1625)</b>	Number	1090	432	103
	%	67.1	26.6	6.3
<b>Professional Services (t.141)</b>	Number	73	58	10
	%	51.8	41.1	7.1

Table 31: Applicants - Academic and Professional Service roles by ethnicity

		No of applicants (1766) Ethnicity		
		White	BAME	Unknown
<b>Academic (t.1625)</b>	Number	578	876	171
	%	35.6	53.9	10.5
<b>Professional Services (t.141)</b>	Number	74	53	14
	%	52.5	37.6	9.9

Table 32: Applicants- Academic and Professional Service roles by disability

		No of applicants (1766) Disability		
		Known Disability	No-Known	Information refused
<b>Academic (t.1625)</b>	Number	40	1437	148
	%	2.5	88.4	9.1
<b>Professional Services (t.141)</b>	Number	6	125	10
	%	4.3	88.6	7.1

ii. Accepted

Table 33: Recruitment: Academic and Professional Service Roles by gender

		No of employees recruited (173)		
		Gender		
		Male	Female	Unknown
<b>Academic (t.157)</b>	Number	99	49	9
	%	63.1	31.2	5.7
<b>Professional Services (t.16)</b>	Number	6	8	2
	%	37.5	50	12.5

Table 34: Recruitment - Academic and Professional Service roles by ethnicity

		No of employees recruited (173)		
		Ethnicity		
		White	BAME	Unknown
<b>Academic (t.157)</b>	Number	84	57	16
	%	53.5	36.3	10.2
<b>Professional Services (t.16)</b>	Number	10	4	2
	%	62.5	25	12.5

Table 35: Recruitment- Academic and Professional Service roles by disability

		No of employees recruited (173)		
		Disability		
		Known Disability	No-Known	Information refused
<b>Academic (t.157)</b>	Number	<5	109	44
	%	N/A	69.4	28.1
<b>Professional Services (t.16)</b>	Number	<5	11	5
	%	N/A	68.7	31.3

## 8. Heriot-Watt University – Composition of influential committees 2017-2019

Table 36: University Court Gender Profile

	Female	Female%	Male	Male %
<b>2017-18</b>	12	50	12	50
<b>2018-19</b>	9	36	16	64

Table 37: University Court Ethnicity Profile

	BAME	BAME %	White	White %
<b>2017-18</b>	<5	N/A	24	96
<b>2018-19</b>	<5	N/A	22	88

\* University Court disability data not available

Table 38: University Senate

	Female	Female%	Male	Male %
<b>2017-18</b>	25	38%	41	62%
<b>2018-19</b>	26	38%	42	62%

\* University Senate disability and ethnicity data not available

Table 39: University Executive – BAME composition

	BAME	BAME %	White	White %
<b>2017-18</b>	<5	N/A	26	93%
<b>2018-19</b>	<5	N/A	22	85%

Table 40: University Executive - gender composition

	Female	Female%	Male	Male %
<b>2017-18</b>	6	40%	9	60%
<b>2018-19</b>	6	40%	9	60%

\* University Executive disability data not available

Table 41: University Committee of Learning and Teaching: gender composition

	Female	Female%	Male	Male %
<b>2017-18</b>	6	35%	11	75%
<b>2018-19</b>	6	35%	11	75%

\*UCLT disability and ethnicity data not available

Table 42: University Committee of Research and Innovation – BAME composition

	BAME	BAME %	White	White %
<b>2017-18</b>	<5	N/A	26	93%
<b>2018-19</b>	<5	N/A	22	85%

Table 43: University Committee of Research and Innovation – gender composition

	Female	Female%	Male	Male %
<b>2017-18</b>	11	39%	17	61%
<b>2018-19</b>	11	42%	15	58%

\*UCRI disability data not available

Table 44: Professional Services Leadership Board – BAME composition

	BAME	BAME %	White	White %
2017-18	2	7%	26	93%
2018-19	4	15%	22	85%

Table 45: Professional Services Leadership Board - gender composition

	Female	Female%	Male	Male %
<b>2017-18</b>	11	39%	17	61%
<b>2018-19</b>	11	42%	15	58%

\*PSLB disability and ethnicity data not available

---

**APPENDIX 6 – PEGASUS HOUSING ASSESSMENT SITE PROFORMA**

**South Riccarton - Housing Study Criteria**

Question	Pegasus Comments	Pegasus Scoring	Councils Scoring
1. Does the site fit within an area identified as a strategic development area?	The site is not in an SDA	-1	N
<b>Active Travel</b>			
2. Does the site support travel by foot to identified convenience services?	There is a Co-Op within a 15 minute walk from the site in Currie. Currie is just over a ten minute walk from the nearest edge of the site and has some small local facilities such as a bakery, library, pharmacy, take away and public house. The Council rate the site as 'no' but the development itself could provide facilities and there are some local services within a 15 minute walk from the site.	1	N
3. If not, can foot access be improved or services provided within walking distance through an appropriate intervention which is deliverable in the plan period?	Yes the site could provide facilities and services within the development which turns the above from a no to a potential and why the site then scores a 2.	2	
4. Does the site support travel by foot to identified employment clusters?	The site is adjacent to Heriot-Watt university which is classed as a special economic area. Sighthill is a 33 walk time from the eastern edge of the site where there is a large amount of employment within an industrial estate and houses an extensive amount of employees such as Royal Mail, Tesco and car rental companies. Alternatively, Sighthills can be accessed via a 11 minute cycle journey along established routes.	2	P
5. If not, can foot access be improved or employment provided within walking distance through an appropriate intervention which is deliverable in the plan period?	It is likely that the design of the site will improve connections to these employment areas which would reduce the walk time and increase permeability to and from the site and employment locations.	0	
6. Does the site have access to the wider cycle network?	The site has access to the wider cycle network NCN route 75 which is located south of Currie and can be accessed via a 5 minute cycle journey from the south eastern part of the site adjacent to Curriehill train station. In total the journey to Edinburgh along the NCN 75 route is 7.5 miles that takes approximately 40 minutes cycle time. To the north of the site is the NCN 754 route that can be accessed via Herriot Watt university that takes a similar journey time of 43 minutes (8.4 miles) to Edinburgh city centre. The Quiet Route proposed network 2015 map shows additional routes in close proximity to the site.	1	N
7. If not, is the site potentially served by an identified cycle route intervention project which is deliverable in the plan period?	Development on the site will allow for improved connections to the wider cycle network and improve the ability to reach the surrounding area by bike.	2	
8. Does the site support active travel overall?	The site can provide onsite facilities reducing the need for potential residents to travel beyond the site. The site can also provide and improve connections to existing active travel routes.	2	N
<b>Public Transport</b>			
9. Does the site support travel by public transport?	The site is located directly next to Currie train station and provides regular services to Edinburgh and Glasgow with an approximate journey time of 20 minutes to Edinburgh. The service runs hourly and then every half a hour during peak times. During the site visit that was undertaken midmorning mid week, the car park was overflowing and was visibly well used. The site is also served by a bus service within Currie and Heriot Watt (number 44, 34) and there is a park and ride at Hermiston which is located a 26 minute walk from the eastern part of the site where there are 10 different bus routes departing regularly throughout the day. The PTAL councils evidence assessment scores the site as a 1 even though the train station is adjacent to the site.	2	N
10. If not, is the site potentially served by an identified public transport intervention project which is deliverable in the plan period?	n/a - the site supports public transport travel already.	0	N
<b>Community Infrastructure</b>			
11. Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?	The site is adjacent to the settlement of Currie where parts of the site can access Currie Primary School on Curriehill Road within a 12 minute walk.	1	N
12. Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?	Currie High School on Dolphin Avenue is approximately 20 minutes walk from the site.	1	N
13. If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?	The site has capacity to provide a primary and secondary school within it.	1	N
<b>Landscape Character</b>			
14. Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?	Part of the site has good boundaries such as the University wall and tree lined boundary that adjoins the part of the eastern boundary, the railway line and Murray Burn to the south of the site acts as defensible boundary. The surrounding roads and farmsteads also act as defensible boundaries to the north and east of the site. The site is a logical extension to the settlement and Heriot Watt.	1	P
<b>Green Network</b>			
15. 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?	Development on the site would change the landscape of the area but the site acts a logical extension to the existing settlement.	1	P
<b>Flood Risk</b>			
16. Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?	The SEPA mapping shows the site adjacent to the train station is at medium risk of flooding with the land adjacent to Murray Burn that runs along the south of the site being at high risk of part river flooding and part surface water flooding. There are also some minor areas in the north of the site that are at high risk of surface water flooding, but it is likely that the design can mitigate and reduce the effects.	1	P
<b>Summary</b>			
Summary of site opportunities and constraints	The site scores positively due to its proximity to Curriehill Train station and links to existing train and bus routes can be improved as part of the development. The proposal also promotes active travel via connections to existing networks. The proposal can increase permeability to existing employment hubs as well as providing new retail, educational and local facilities in the site. The site is in close proximity to a primary and secondary school which can be utilised until the onsite educational facilities are provided. Overall the council should reconsider the sites assessment and allocate the site based on the above.	Y	N
<b>Total Score</b>		<b>17</b>	<b>-5</b>



**East of Riccarton - Housing Study Criteria**

Question	Pegasus Comments	Pegasus Scoring	Councils Scoring
1. Does the site fit within an area identified as a strategic development area?	The site is not in an SDA	-1	N
<b>Active Travel</b>			
2. Does the site support travel by foot to identified convenience services?	There is a Co-Op in Currie which is located within a ten minute walk from the south west part of the site. There is a Tesco Superstore in Sighthills on Cutlins Way located within a 15 minute walk from the northern part of the site. There is also a Lidl located a 12 minute walk that is situated within Westside Plaza shopping centre in Wester Hailes where there are other discount stores and local facilities e.g. Post office. The route to both of these requires walking over a bridge with the Edinburgh Bypass so this is unlikely to be a favoured route for pedestrians.	2	P
3. If not, can foot access be improved or services provided within walking distance through an appropriate intervention which is deliverable in the plan period?	It is likely of a site of this scale will provide a convenience store and other local facilities but the site already has existing provision so the scoring is not applicable for this question.	0	
4. Does the site support travel by foot to identified employment clusters?	The site is adjacent to Herriot Watt University campus classed as a special economic area. South Gyle and Sighthills are located a 27 minute walk from the northern part of the site, they have a large amount of employment within an industrial estate and houses an extensive amount of employees such as Royal Mail, Tesco and car rental companies. Wester Hailes shopping facilities are also located a 5 minute walk from the nearest eastern part of the site and contains employment opportunities.	2	P
5. If not, can foot access be improved or employment provided within walking distance through an appropriate intervention which is deliverable in the plan period?	The development of the site will allow for a direct route to these employment locations and will increase permeability.	0	
6. Does the site have access to the wider cycle network?	The NCR754 is located a 3 minute (0.5 miles) cycle journey from the northern part of the site from the site which provides access to Edinburgh city centre approximately 34 minutes (6.3 mile) cycle journey from the site.	2	N
7. If not, is the site potentially served by an identified cycle route intervention project which is deliverable in the plan period?	The site already has existing cycle routes that can be connected to the site.	0	
8. Does the site support active travel overall?	The site supports active travel by being in close proximity to employment, shopping and local facilities. The site would be able to provide additional onsite facilities to serve the development and would promote cycling by its close proximity to existing networks that provide commutable routes to Edinburgh city centre.	2	N
<b>Public Transport</b>			
9. Does the site support travel by public transport?	Wester Hailes Station (one the same line as Curriehill) is located 11 minutes walk away from the sites eastern edge, the train station provides regular routes to Edinburgh and Glasgow that increase in frequency during peak hours. Estimated journey time to Edinburgh is 20 minutes making it easy for commuter access into Edinburgh. Pedestrian routes to the station from the site require the use of a bridge over The City of Edinburgh Bypass. Alternatively to the east of the site is Curriehill train station a 20 minute (1 mile) walk from the site. Hermiston Park and Ride Scheme is adjacent to the north west of the site and provides 10 frequent bus services across the region.	2	N
10. If not, is the site potentially served by an identified public transport intervention project which is deliverable in the plan period?	n/a - the site supports public transport travel already.	0	N
<b>Community Infrastructure</b>			
11. Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?	Slighthill Primary School, Calder Park is the closest school to the site and it is approximately a 10 minute (0.5 mile) walk from the northern part of the site. The walk requires crossing The City of Edinburgh bypass via a bridge which is not attractive for people especially for adults with young children. There is an alternate primary school in Juniper Green which is 14 minute (0.6 mile) mile walk from the southern part of the site. Canal View Primary School in Wester Hailes, Clovenstone Primary School in Clovenstone and Currie Primary School are located to the east of the site and are within a 15 minute walk.	2	N
12. Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?	Currie Secondary School is approximately 1 mile from the west of the site and Darroch Secondary school is located within a ten minute walk (0.6 mile) from the southern part of the site.	1	N
13. If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?	The has some educational provision nearby but for secondary schools the proximity is over the councils 800m/ 10 minute walk radius. It is likely that the site may provide primary and secondary educational facilities.	1	P
<b>Landscape Character</b>			
14. Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?	The site would join the settlements at Baberton to the north but the site is well contained by the railway line to the south, A720 bypass to the east that separates the site from Wester Hailes, the A71 to the north acts as a strong boundary and Heriot Watt to west is a strong defensible boundary.	1	Y
<b>Green Network</b>			
15. 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?	The site would act as a logical extension to the settlement and connect to existing urban development but this would result in a small loss of landscape.	1	P
<b>Flood Risk</b>			
16. Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?	The site has a Burn running through it from west to east and the SEPA mapping shows along this area the site is at high risk of river flooding. Flood mitigation measures could be implemented but due to this being in the centre of the site it would result in a loss of developable area.	1	P
<b>Summary</b>			
Summary of site opportunities and constraints	The site has access to convenience stores to the west and east. Permeability to the east is limited as the A720 acts as physical obstacle and isn't a preferred pedestrian option, however there are a large range of facilities at Sighthills which takes around a 15 minute walk. The site is supported by cycle routes in close proximity and overall the site supports active travel to local amenities and employment. The site is well connected to good existing public transport infrastructure. Overall the site is a sustainable location and is well contained. Parts of the site are susceptible to flood risk but it is likely that these can be overcome through the design and layout. The site based on the above should be allocated for development.	Y	Y
<b>Total Score</b>		<b>16</b>	<b>0</b>



Kirkliston - Housing Study Criteria

Craigbrae



North Kirkliston



Question	Pegasus Comments - Craigbrae	Pegasus Scoring	Councils Scoring	Pegasus Comments - North Kirkliston	Pegasus Scoring	Councils Scoring
1. Does the site fit within an area identified as a strategic development area?	The site is not in an SDA	-1	N	The site is not in an SDA	-1	N
<b>Active Travel</b>						
2. Does the site support travel by foot to identified convenience services?	The site is located 15 minutes walk (800m from the western site boundary) from Co-Op in Kirkliston and does therefore not meet the councils criteria.	-1	P	The site is located 12 minutes walk (900m from the eastern site boundary) from Co-Op in Kirkliston and does therefore not meet the councils criteria.	-1	P
3. If not, can foot access be improved or services provided within walking distance through an appropriate intervention which is deliverable in the plan period?	There is a limited shopping provision within Kirkliston so an increase in development may trigger the need for a new convenience store. The development could provide a connecting footpath through the existing development to shorten the journey time.	1		There is a limited shopping provision within Kirkliston so an increase in development may trigger the need for a new convenience store.	1	
4. Does the site support travel by foot to identified employment clusters?	There are no employment clusters within 30 minutes from the site so the site does not support travel by foot to employment.	-1	N	There are no employment clusters within 30 minutes from the site so the site does not support travel by foot to employment.	-1	N
5. If not, can foot access be improved or employment provided within walking distance through an appropriate intervention which is deliverable in the plan period?	There are no employment clusters close by for the site to provide walking access too, however the site could provide some local shops and facilities which would create some employment.	1		There are no employment clusters close by for the site to provide walking access too, however the site could provide some local shops and facilities which would create some employment.	1	
6. Does the site have access to the wider cycle network?	Neither the NCN or the proposed Quiet Route is in close proximity to the site.	-1	N	Neither the NCN or the proposed Quiet Route is in close proximity to the site.	-1	N
7. If not, is the site potentially served by an identified cycle route intervention project which is deliverable in the plan period?	Doesn't seem any logical connections to the network due to its remote proximity. There is a footpath that links the site to Newbridge but this would take over 40 minutes walking and it isn't an established cycle path with hard pathways so would unlikely to be used by commuters to Newbridge.	-1		Doesn't seem any logical connections to the network due to its remote proximity.	-1	
8. Does the site support active travel overall?	The site does not support active travel as there is no nearby facilities or employment and the site heavily relies on travel via car and would increase traffic on already congested areas at the junction of Queensferry Road, Main Street and Station Road.	-1	N	The site does not support active travel as there is no nearby facilities or employment and the site heavily relies on travel via car and would increase traffic on already congested areas at the junction of Queensferry Road, Main Street and Station Road.	-1	N
<b>Public Transport</b>						
9. Does the site support travel by public transport?	There is a bus stop on Eilston Road which runs hourly services to Glasgow, Riccarton and Queensferry (with higher frequencies to Queensferry around 8/9 am). There is no other public transport near to the site.	-1	N	There is a bus stop on Eilston Road which runs hourly services to Glasgow, Riccarton and Queensferry (with higher frequencies to Queensferry around 8/9 am). There is no other public transport near to the site.	-1	N
10. If not, is the site potentially served by an identified public transport intervention project which is deliverable in the plan period?	The site could add a new bus route around the development or add a station on the existing railway line to the north of the site.	1	N	The site could add a new bus route around the development or add a station on the existing railway line to the north of the site.	1	N
<b>Community Infrastructure</b>						
11. Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?	Kirkliston Primary school is the only primary school in the area and it is located around a 19 minute (0.9 mile) walk from the closest edge of the site. There is a pre-school/ nursery a 12 minute walk from the site.	-1	N	Kirkliston Primary school is the only primary school in the area and it is located around a 19 minute (0.9 mile) walk from the closest edge of the site. There is a pre-school/ nursery a 7 minute walk from the site.	-1	N
12. Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?	The nearest secondary school is 3.5km in Queensferry High School	-1	N	The nearest secondary school is 3.5km in Queensferry High School	-1	N
13. If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?	The site may be able to provide a primary school and secondary school as there has been a large amount of housing development in the area but currently the site does not have good educational provision.	1	P	The site may be able to provide a primary school and secondary school as there has been a large amount of housing development in the area but currently the site does not have good educational provision.	1	P
<b>Landscape Character</b>						
14. Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?	The development on the site would sprawl Kirkliston to the east, this can be partially contained by the M90, railway line and Burnshot Road and extend the current housing development in north east Kirkliston	1	N	Development of the site would be an extension to the north of Kirkliston and could be well contained by the M90, B800 and railway line preventing further sprawl.	2	N
<b>Green Network</b>						
15. 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?	Green network located to the south west of Kirkliston and could be linked	1	P	Green network located to the south west of Kirkliston and could be linked	1	P
<b>Flood Risk</b>						
16. Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?	The site is not located in a flood zone according to SEPA and Magic Maps. The councils ES says half the site is within 1 in 200 year flood zone but the flood risk map doesn't show this, however the site is scored positively in this assessment.	1	Y	The site is not located in a flood zone according to SEPA and Magic Maps. The councils assessment for the ES states that the site is within a catchment area for a river or burn, where there is known to be engineered alterations to the river and the site should take into account the reduced resilience of this river.	1	Y
<b>Summary</b>						
Summary of site opportunities and constraints	The site acts a logical extension to the settlement of Kirkliston to the east to some extent but due to the limited facilities in the area the council should discount this site. There is only one convenience store serving the whole of Kirkliston and the site does not promote active travel due to the lack of cycle routes and proximity to employment. The only means of public transport is via a bus that runs hourly meaning that the site relies heavily on car ownership/usage in order to achieve basic needs such as work, shopping and education. Overall the site is not a sustainable location for development. The site based on the above should not be allocated for development.	N	Y	The site acts a logical extension to the settlement of Kirkliston to the east to some extent but due to the limited facilities in the area the council should discount this site. There is only one convenience store serving the whole of Kirkliston and the site does not promote active travel due to the lack of cycle routes and proximity to employment. The only means of public transport is via a bus that runs hourly meaning that the site relies heavily on car ownership/usage in order to achieve basic needs such as work, shopping and education. Overall the site is not a sustainable location for development. The site based on the above should not be allocated for development.	N	Y
	<b>Total Score</b>	<b>-2</b>	<b>-4</b>	<b>Total Score</b>	<b>-1</b>	<b>-4</b>

West Edinburgh - Housing Study Criteria

Question	Pegasus Comments	Pegasus Scoring	Councils Scoring
1. Does the site fit within an area identified as a strategic development area?	Yes the site is within West Edinburgh SDA.	2	Y
<b>Active Travel</b>			
2. Does the site support travel by foot to identified convenience services?	There is a small M&S Simply Food store that is attached to a BP garage on Glasgow Road that is adjacent to the northern boundary of the site. To the east of the site there is a Scotmid located 10 minutes from the closest western part of the site, to the east of the site there is a Tesco Express around a 13 minute walk from the closest eastern part of the site, both of these are not in convenient locations for the centre of the development. This leaves the M&S on Glasgow Road which is likely to serve the population of the site.	1	P
3. If not, can foot access be improved or services provided within walking distance through an appropriate intervention which is deliverable in the plan period?	It is likely due to the scale of the development that the site would provide a convenience store to serve the new residents for shops to be provided as part of the development, adjacent to the site on Glasgow Road the land is allocated for employment in the current Local Plan so has potential to provide a convenience store.	2	
4. Does the site support travel by foot to identified employment clusters?	Currently surrounding the site there is an employment cluster at Ratho and Newbridge which is to the east of the site. From the closest site boundary edge in the east the employment in Ratho is a 10 minute walk however from the western edge the employment is a 40 minute walk away. The employment north of Newbridge is a 30 minute walk from the site along Glasgow Road. The direct walking route is along Glasgow Road which is a busy road, to get to Newbridge on the opposite side of the M9 requires going over this road via a bridge/roundabout, the roundabout gets very congested as it is a motorway junction for the M9 and isn't pedestrian friendly. There is a small footbridge over the motorway but this isn't appealing to pedestrians. Due to this it is unlikely that residents would walk from the site to Newbridge.	1	P
5. If not, can foot access be improved or employment provided within walking distance through an appropriate intervention which is deliverable in the plan period?	Opposite the site, north of Glasgow Road, the land has been allocated for employment in the current local plan for an International Business Gateway as part of Edinburgh Airport, but there have been no plans submitted to date.	0	
6. Does the site have access to the wider cycle network?	The site isn't in close proximity to the NCN there is a small footpath on the site of Glasgow Road but this is not very practical as going west towards Kirkkliston the path disappears and requires crossing the road and using the pedestrian bridge over the M9, this road is very congested and is a motorway junction so not a desired cycling route. Going east along Glasgow Road the small path continues. The site has cycling opportunities but these are not the best in quality or permeability.	1	P
7. If not, is the site potentially served by an identified cycle route intervention project which is deliverable in the plan period?		0	
8. Does the site support active travel overall?	The site has potential to promote active travel if the surrounding infrastructure and connections were improved. The site is in a location close to employment but permeability is an issue.	1	P
<b>Public Transport</b>			
9. Does the site support travel by public transport?	To the north of the site is a tram stop at Ingliston Park and Ride which provides a frequent service to the airport and into Edinburgh city centre with an approx. Journey time of 36 minutes. From the closest part of the site the tram stop is located a 10 minute walk, the route to the tram stop requires crossing busy roads and going under the A8 which is pedestrian friendly. There is a train station at Edinburgh Gateway but this is a 30 minute walk from the closest western edge of the site, the tram does stop at this station that provides services to Edinburgh, Glenrothes with Thornton, Perth and Arbroath. There is a bus stop along Glasgow Road (Ingliston Showground) within a 10 minute walk, adjacent to the site which provide frequent intercity and wider area routes via 12 different services.	1	N
10. If not, is the site potentially served by an identified public transport intervention project which is deliverable in the plan period?	The site could be improved if the tram stop was extended further to the east towards Newbridge or if the walking route was improved for this would boost the score for this criteria. The development at IBG and at the Royal Highland Showground may improve the accessibility to public transport using the existing services.	2	Y
<b>Community Infrastructure</b>			
11. Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?	Hillwood Primary School is the only primary school within 3km of the site and is approximately a 10 minute walk from the western and nearest boundary edge. There are no others within a 3km radius of the site.	1	N
12. Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?	The nearest secondary school is Craigmount High School in Corstophine which is over 3.3km from the nearest eastern site edge, equating to a 45 minute walk along Glasgow Road.	-1	N
13. If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?	The site could be improved by including a primary and secondary school to accommodate the new pupils that would be attending Hillwood Primary School and secondary school would also be needed as there is not one in close proximity to the site. The council's assessment echoed this and said that the preference would be a secondary school for 1200 pupils.	1	P
<b>Landscape Character</b>			
14. Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?	The site would be visible from Glasgow Road due to the topography of the site rising towards the south. The site could be a logical extension of Ratho to the east and has well established boundaries to the north (Glasgow Road), south (railway line) and to the east (existing settlement). To the west there would need to be boundaries established to prevent the site merging the extension of Ratho into Gogar and Milburn Tower.	1	P
<b>Green Network</b>			
15. 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?	The site could improve the green network but could impact the green space at Gogarburn Golf Club.	1	P
<b>Flood Risk</b>			
16. Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?	The site has some small minor areas that are at high risk of surface water flooding on the SEPA mapping. The site is scored 'X' in the ES but 'P' in the HS.	1	P
<b>Summary</b>			
Summary of site opportunities and constraints	The site has limited convenience store facilities in close proximity. There are some employment clusters relatively close to the site that could promote active travel however the physical constraints of road layouts and the lack of active travel friendly infrastructure e.g. cycle paths make it unlikely as it stands that residents would use active travel to get to these locations. There are plans for employment development at IBG but these have not commenced. The site has good bus transport links but despite the tram station being in close proximity it is the physical walking boundaries that mean pedestrians are unlikely to use these routes. Education provision is also sparse and would need to be improved as part of the development. The site as it stands relies on mainly car usage but improvements to the area including the IBG development would overcome this. The site based on the above and noting the improvements should be allocated.	Y	Y
<b>Total Score</b>		<b>15</b>	<b>9</b>



**Calderwood - Housing Study Criteria**

**Overshield**



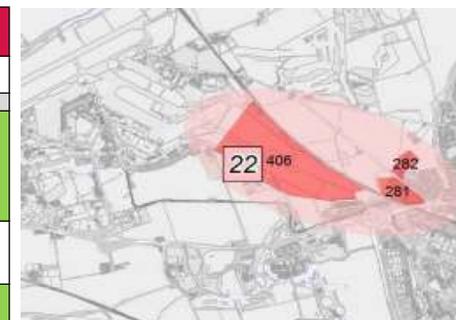
**Bonnington**



Question	Pegasus Comments	Pegasus Scoring	Councils Scoring	Pegasus Comments (if second parcel)	Pegasus Scoring	Councils Scoring
1. Does the site fit within an area identified as a strategic development area?	The site is not in an SDA	-1	N	The site is not in an SDA	-1	N
<b>Active Travel</b>						
2. Does the site support travel by foot to identified convenience services?	There are no convenience stores or local facilities within the area, the closest shop is a Co-Op located a 30 minute walk from the nearest site edge. The council's assessment states that there is a convenience store within the master plan for the adjacent development that is within West Lothian council, however this is yet to be built out and there are no other	-1	Y	There are no convenience stores or local facilities within the area, the closest shop is a Co-Op located a 30 minute walk from the nearest site edge. The council's assessment states that there is a convenience store within the master plan for the adjacent development that is within West Lothian council, however this is yet to be built out and there are no other	-1	P
3. If not, can foot access be improved or services provided within walking distance through an appropriate intervention which is deliverable in the plan period?	The site has potential to accommodate a convenience store but there are no other local facilities in the area so improving foot access would not be beneficial until there are other facilities.	-1		The site has potential to accommodate a convenience store but there are no other local facilities in the area so improving foot access would not be beneficial until there are other facilities.	-1	
4. Does the site support travel by foot to identified employment clusters?	There are no employment clusters in close proximity to the site.	-1	N	There are no employment clusters in close proximity to the site.	-1	N
5. If not, can foot access be improved or employment provided within walking distance through an appropriate intervention which is deliverable in the plan period?	Potentially if there was employment provided within the development/nearby	1		Potentially if there was employment provided within the development/nearby	1	
6. Does the site have access to the wider cycle network?	The site could be connected to the cycle network to the north (NCN 72) along the River Almond but to get into Edinburgh the route is around 13 miles and would take over an hour, Livingston can be accessed 20 minutes by cycling. It is unlikely that commuters would use the NCN route as it is along a river and woodland. The alternate route to Livingston is along the B7015 which does not have a cycle lane and is complex and not direct	0	N	The site could be connected to the cycle network to the north (NCN 72) along the River Almond but to get into Edinburgh the route is around 13 miles and would take over an hour, Livingston can be accessed 20 minutes by cycling. It is unlikely that commuters would use the NCN route as it is along a river and woodland. The alternate route to Livingston is along the B7015 which does not have a cycle lane and is complex and not direct	0	N
7. If not, is the site potentially served by an identified cycle route intervention project which is deliverable in the plan period?		0			0	
8. Does the site support active travel overall?	The site is very far out from local services and employment, the nearest settlement with employment and facilities is in Livingston but this is over an hours walk from the site and the cycle routes are not straight forward. Due to the lack of amenities in walking distance, the site heavily relies on cars.	-1	N	The site is very far out from local services and employment, the nearest settlement with employment and facilities is in Livingston but this is over an hours walk from the site and the cycle routes are not straight forward. Due to the lack of amenities in walking distance, the site heavily relies on cars.	-1	N
<b>Public Transport</b>						
9. Does the site support travel by public transport?	The nearest bus stop is a 11 minute walk from the closest edge of the site on the B7015 at Camps Industrial Estate. There is a service (X27) that runs hourly and then every thirty between 9am until 3pm and runs until 7pm. The journey time to Edinburgh is around 40 minutes however at peak times it is sometimes a longer duration due to traffic and no bus lane on the A71 into the city centre. The bus journey time to Livingston (X27) is around 25 minutes. Kirknewton train station is the nearest railway station and is around a 35 minute walk from the nearest edge of the site so it is unlikely that people who lived in the site would walk to the station.	-1	N	The nearest bus stop is a 11 minute walk from the closest edge of the site on the B7015 at Camps Industrial Estate. There is a service (X27) that runs hourly and then every thirty between 9am until 3pm and runs until 7pm. The journey time to Edinburgh is around 40 minutes however at peak times it is sometimes a longer duration due to traffic and no bus lane on the A71 into the city centre. The bus journey time to Livingston (X27) is around 25 minutes. Kirknewton train station is the nearest railway station and is around a 35 minute walk from the nearest edge of the site so it is unlikely that people who lived in the site would walk to the station.	-1	N
10. If not, is the site potentially served by an identified public transport intervention project which is deliverable in the plan period?	Unlikely that the development would benefit from a public transport intervention project. A bus lane may reduce the journey time into Edinburgh and a more frequent service but it is likely that people will use their own car.	-1	N	Unlikely that the development would benefit from a public transport intervention project. A bus lane may reduce the journey time into Edinburgh and a more frequent service but it is likely that people will use their own car.	-1	N
<b>Community Infrastructure</b>						
11. Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?	St Pauls Primary school in East Calder is the closest primary school to the site, located around a 24 minute walk from site. It is likely that the adjacent development will provide a primary school to serve its community but this is not built out. The council don't provide any details on this due to it being within a West Lothian school catchment area.	-1	n/a	St Pauls Primary school in East Calder is the closest primary school to the site, located around a 24 minute walk from site. It is likely that the adjacent development will provide a primary school to serve its community but this is not built out. The council don't provide any details on this due to it being within a West Lothian school catchment area.	-1	N
12. Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?	There are 4 secondary schools in Livingston but to access these via active travel it would take 1 hour 30 to walk and around 30 minutes to cycle from the nearest edge of the site.	-1	n/a	There are 4 secondary schools in Livingston but to access these via active travel it would take 1 hour 30 to walk and around 30 minutes to cycle from the nearest edge of the site.	-1	N
13. If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?	A primary and secondary school could be provided within the site but the adjacent site should not be relied on for providing a school due to it being within a different council which may limit the catchment to those within that authority.	1	P	A primary and secondary school could be provided within the site but the adjacent site should not be relied on for providing a school due to it being within a different council which may limit the catchment to those within that authority.	1	P
<b>Landscape Character</b>						
14. Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?	The site is very much a rural area and is very isolated from other amenities so the site would have a significant impact on the rural landscape despite the adjacent development. The council assessment also notes this but justifies the development by saying it will change due to the adjacent development.	-1	N	The site is very much a rural area and is very isolated from other amenities so the site would have a significant impact on the rural landscape despite the adjacent development. This is a large parcel and wouldn't act as a strategic extension to the development being built out within West Lothian. The council assessment also notes this but justifies the development by saying it will change due to the adjacent development.	-1	N
<b>Green Network</b>						
15. 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?	Due to the rural character of the area the site has the potential to connect and improve green space, especially along the River Almond to the north of the site but this should override the vast loss of landscape that developing the site would have.	1	P	Due to the rural character of the area the site has the potential to connect and improve green space, especially along the River Almond to the north of the site but this should override the vast loss of landscape that developing the site would have.	1	P
<b>Flood Risk</b>						
16. Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?	The SEPA map shows that a few parts of the site are at risk of surface water flooding but these are not large areas and would not significantly impact the developable area.	1	Y	The SEPA map shows that small parts of the site are at risk of surface water flooding but these are not large areas and can be mitigated through the design. The council in the ES rate the site for flooding as '1' in the ES but then rate it '2' in the ES.	1	Y
<b>Summary</b>						
Summary of site opportunities and constraints	The site does not have any community facilities within the area such as shops and schools. The site is reliant on development that may come about from the adjacent development that it currently under construction. However, even with this development the site is not in close proximity to local settlements. Employment locations are not within walking distance and transport is limited to one bus service. Overall the is not sustainable and supports car usage. Development in such a rural area would impact the landscape and green network along the River Almond. The council	N	Y	The site does not have any community facilities within the area such as shops and schools. The site is reliant on development that may come about from the adjacent development that it currently under construction. However, even with this development the site is not in close proximity to local settlements. Employment locations are not within walking distance and transport is limited to one bus service. Overall the is not sustainable and supports car usage. Development in such a rural area would impact the landscape and green network along the River Almond. The council	N	Y
<b>Total Score</b>		<b>-6</b>	<b>-1</b>	<b>Total Score</b>	<b>-6</b>	<b>-4</b>

**Crosswinds - Housing Study Criteria**

Question	Pegasus Comments	Pegasus Scoring	Councils Scoring
Does the site fit within an area identified as a strategic development area?	Yes the site is within an SDA.	2	n/a
<b>Active Travel</b>			
Does the site support travel by foot to identified convenience services?	Tesco Express by the RBS headquarters is located a 15 minute walk from the closest site edge. There is a Morrisons adjacent to Gyle shopping centre located around a 15 minute walk from the sites closest edge. To get to either Morrisons or Tesco Express the walk involves crossing Glasgow Road via Gogar Roundabout, this is a major interchange where the Edinburgh Bypass meets Glasgow Road so is not pleasant for pedestrians.	-1	Y
If not, can foot access be improved or services provided within walking distance through an appropriate intervention which is deliverable in the plan period?	Walking links to Gyle Shopping centre and Morrisons next to the centre to promote the use of existing facilities via walking as they are within walking distance it is the physical constraints hindering this.	1	
Does the site support travel by foot to identified employment clusters?	There is employment in close proximity to the site at Gyle which is within a 15 minute walk from the closest edge of the site. There is potential development at the Edinburgh International Business Gateway to the west of the site but this is yet to commence.	2	Y
If not, can foot access be improved or employment provided within walking distance through an appropriate intervention which is deliverable in the plan period?	n/a - the site has good access to employment	0	
Does the site have access to the wider cycle network?	There are some footpaths along Glasgow Road that provide walking and cycling routes towards Gyle and Corstorphine - the routes could be better as currently it involves crossing Glasgow Road to get to Gyle or walking alongside Glasgow Road to get to Corstorphine which is a busy road with two lanes each way. To cycle to Edinburgh city centre along Glasgow Road would take around 30 minutes (5.7 miles) by bike. The site does not have access to the NCN.	1	Y
If not, is the site potentially served by an identified cycle route intervention project which is deliverable in the plan period?		0	
Does the site support active travel overall?	The site is in a good location for connections to Gyle which has both employment sites and shopping facilities.	1	Y
<b>Public Transport</b>			
Does the site support travel by public transport?	Edinburgh airport tram stop and Edinburgh gateway provides tram and train services that are adjacent to the site around a 3 minute walk away. The train station provides frequent connections to Edinburgh, Dundee, Perth and Inverness with the Tram providing a frequent service to Edinburgh city centre. There is a bus stop at Maybury on Glasgow Road (around a 10 minute walk) where there are 10 services that operate frequently around the area.	2	P
If not, is the site potentially served by an identified public transport intervention project which is deliverable in the plan period?	n/a - the site has good access to public transport	0	n/a
<b>Community Infrastructure</b>			
Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?	East Craigs Primary School is the nearest primary school to the site and it's a 30 minute walk from the nearest boundary.	-1	N
Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?	Craigmount High School is the nearest secondary school and is located around a 20 minute walk from the site.	-1	N
If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?	The site could provide a primary school within it or the neighbouring IBG development could.	1	P
<b>Landscape Character</b>			
Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?	The site is currently brownfield and there is a large amount of employment in the area, however it could have noise issues for potential residents being located adjacent to a runway.	2	n/a
<b>Green Network</b>			
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?	The site would not result in a loss of landscape due to it being a brownfield site.	1	n/a
<b>Flood Risk</b>			
Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?	The southern boundary of the site is at high risk of river flooding but it is likely that this can be mitigated through the design and would not result in a loss of developable area.	1	P
<b>Summary</b>			
Summary of site opportunities and constraints	The site is in close proximity to employment and shopping facilities but these routes could be improved to make them more pedestrian friendly to promote active travel and promote cycling to Edinburgh city centre. The site scores poorly on education provision and facilities should be provided within the site. The site is well connected by public transport. The site could have noise implications for future residents but its brownfield status is beneficial and therefore the site should be considered for development noting the improvements above.	Y	P
<b>Total Score</b>		<b>11</b>	<b>9</b>



**EDINBURGH CHOICES FOR CITY PLAN - HOUSING STUDY SUMMARY TABLE (COUNCIL AND PEGASUS GROUP SITE ASSESSMENTS)**

Council Scoring		Pegasus Scoring																				
Yes (Y)		Positive (2)																				
No (N)		Negative (-1)																				
Partial (P)		Partial (1)																				
Neutral / Not Assessed		Neutral (0)																				
Site Name	Housing Topic	SDA	Active Travel								Public Transport		Community Infrastructure			Landscape Character	Green Network	Flood Risk	Site Score	Collated Council	Collated Pegasus	Allocate (Yes / No)
	Question Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16					
South Riccarton	Council	N	N		P		N		N	N	N	N	N	N	P	P	P	-5	-5	17	N	
	Pegasus	-1	1	2	2	0	1	2	2	2	0	1	1	1	1	1	1	17			Y	
East of Riccarton	Council	N	P		P		N		N	N	N	N	N	P	Y	P	P	0	0	16	Y	
	Pegasus	-1	2	0	2	0	2	0	2	2	0	2	1	1	1	1	1	16			Y	
Craigbrae (Kirkliston)	Council	N	P		N		N		N	N	N	N	N	P	N	P	Y	-4	-4	-1.5	Y	
	Pegasus	-1	-1	1	-1	1	-1	-1	-1	-1	1	-1	-1	1	1	1	1	-2			N	
North Kirkliston (Kirkliston)	Council	N	P		N		N		N	N	N	N	N	P	N	P	Y	-4	-4	-1.5	Y	
	Pegasus	-1	-1	1	-1	1	-1	-1	-1	-1	1	-1	-1	1	2	1	1	-1			N	
Norton Park (West Edinburgh)	Council	Y	P		P		P		P	N	Y	N	N	P	P	P	P	9	9	15	Y	
	Pegasus	2	1	2	1	0	1	0	1	1	2	1	-1	1	1	1	1	15			Y	
Overshield (Calderwood)	Council	N	Y		N		N		N	N	N	N/A	N/A	P	N	P	Y	-1	-2.5	-6	Y	
	Pegasus	-1	-1	-1	-1	1	0	0	-1	-1	-1	-1	-1	1	-1	1	1	-6			N	
Bonnington (Calderwood)	Council	N	P		N		N		N	N	N	N	N	P	N	P	Y	-4	-2.5	-6	Y	
	Pegasus	-1	-1	-1	-1	1	0	0	-1	-1	-1	-1	-1	1	-1	1	1	-6			N	
Crosswinds	Council	N/A	Y		Y		Y		Y	P	N/A	N	N	P	N/A	N/A	P	9	9	11	P	
	Pegasus	2	-1	1	2	0	1	0	1	2	0	-1	-1	1	2	1	1	11			Y	

**Reference Question**

- Does the site fit within an area identified as a strategic development area?
- Does the site support travel by foot to identified convenience services?
- If not, can foot access be improved or services provided within walking distance through an appropriate intervention which is deliverable in the plan period?
- Does the site support travel by foot to identified employment clusters?
- If not, can foot access be improved or employment provided within walking distance through an appropriate intervention which is deliverable in the plan period?
- Does the site have access to the wider cycle network?
- If not, is the site potentially served by an identified cycle route intervention project which is deliverable in the plan period?
- Does the site support active travel overall?
- Does the site support travel by public transport?
- If not, is the site potentially served by an identified public transport intervention project which is deliverable in the plan period?
- Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?
- Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?
- If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?
- Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?
- 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?
- Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?