Customer Ref:	00009	Response Ref:	ANON-KU2U-GPEE-8	Supporting Info
Name	Callum Frase	r (Iceni Projects)		Email CFraser@iceniprojects.com
Response Type	Agent / Cons	ultant		
On behalf of:	West Craigs L	.td		
Choice	1 A			
			s together as part of a city-wid upport / don't support	de, regional, and national green network. We want new development to connect to, and
deliver this netwo	Jik. Do you agi	ee with this: - select s	upport / doir t support	
Short Response	Not Answered			
Explanation	Not Answered			
Explanation	TVOE / TIISWET EU			
Choice	1 B			
We want to chan	ge our policy to	require all developm	ent (including change of use) t	to include green and blue infrastructure. Do you agree with this? - Support / Object
Chart Danier	N			
•	Not Answered			
Explanation	NOT Allswelled			

<b>Customer Ref:</b>	00009	Response Ref:	ANON-KU2U-GPEE-8	Suppor	ting Info						
Name	Callum Fraser	(Iceni Projects)		Email	CFraser@ico	eniprojects	.com				
Response Type	Agent / Consu	ultant									
On behalf of:	West Craigs L	td									
Choice	1 C										
We want to ident	ify areas that c	an be used for future	water management to enab	le adaptation to clir	nate change	e. Do you a	gree with t	:his? - Yes /	No		
Short Response	Not Answered										
Explanation	Not Answered										
Choice	1 D										
	ly set out under	r what circumstances t	the development of poor qu	uality or underused o	open space v	will be con	sidered acc	ceptable. Do	you agre	e with this?	-
We want to clear Yes / No	ly set out under	r what circumstances t	the development of poor qu	uality or underused o	open space v	will be con	sidered acc	ceptable. Do	you agre	e with this?	-
Yes / No	ly set out under	r what circumstances t	the development of poor qu	uality or underused o	open space v	will be con	sidered acc	ceptable. Do	you agre	e with this?	-
Yes / No		r what circumstances t	the development of poor qu	uality or underused o	open space v	will be con	sidered acc	ceptable. Do	you agre	e with this?	-
Yes / No Short Response	Not Answered	r what circumstances t	the development of poor qu	uality or underused o	open space v	will be con	sidered acc	ceptable. Do	you agre	e with this?	-
Yes / No Short Response Explanation	Not Answered Not Answered	r what circumstances t	the development of poor qu	uality or underused o	open space v	will be con	sidered acc	ceptable. Do	you agre	e with this?	-
Yes / No  Short Response  Explanation  Choice	Not Answered Not Answered  1 E										
Yes / No  Short Response  Explanation  Choice  We want to intro	Not Answered Not Answered  1 E duce a new 'ext		the development of poor questions of questions of poor questions of questions of que								
Yes / No  Short Response  Explanation  Choice	Not Answered Not Answered  1 E duce a new 'ext										
Yes / No  Short Response  Explanation  Choice  We want to intro	Not Answered Not Answered  1 E duce a new 'ext										
Yes / No  Short Response  Explanation  Choice  We want to intro you agree with th	Not Answered  Not Answered  1 E  duce a new 'extins? - Yes / No										

<b>Customer Ref:</b>	00009	Response Ref:	ANON-KU2U-GPEE-8	Suppo	rting Info			
Name	Callum Frase	er (Iceni Projects)		Email	CFraser@ice	eniprojects	.com	
Response Type	Agent / Cons	sultant						
On behalf of:	West Craigs	Ltd						
Choice	1 F							
We want to ident this? - Yes / No	ify specific site	es for new allotments a	nd food growing, both as part	of new develop	ment sites an	d within o	pen space in the urban area	Do you agree with
<b>Short Response</b>	Not Answered	1						
Explanation	Not Answered	1						
Choice	1 F							
We want to ident this? - Upload (m		es for new allotments a	nd food growing, both as part	of new develop	ment sites an	d within o	pen space in the urban area	Do you agree with
<b>Short Response</b>								
-	No							
Explanation	No							
·								
Choice	1 G							
Choice	1 G	dditional cemetery pro	vision, including the potential	for green and w	oodland buri	als. Do you	u agree with this? - Yes / No	
Choice We want to ident	1 G ify space for a		vision, including the potential	for green and w	oodland buri	als. Do you	u agree with this? - Yes / No	
Choice We want to ident Short Response	1 G  ify space for a  Not Answered	1	vision, including the potential	for green and w	oodland buri	als. Do you	u agree with this? - Yes / No	
Choice We want to ident	1 G ify space for a	1	vision, including the potential	for green and w	oodland buri	als. Do you	u agree with this? - Yes / No	

<b>Customer Ref:</b>	00009	Response Ref:	ANON-KU2U-GPEE-8	Suppor	ting Info					
Name	Callum Frase	r (Iceni Projects)		Email	CFraser@ice	eniprojects	.com			
Response Type	Agent / Cons	ultant								
On behalf of:	West Craigs L	td								
Choice	1 H									
We want to revis Do you agree wit			e designations to ensure that n	ew green spaces	have long to	erm maint	enance and	management	arrangem	ents in place.
, ,	•									
<b>Short Response</b>	Not Answered									
Explanation	Not Answered									
Choice	2 A									
We want all deve										
			rrough design and access stater res to address accessibility for							-
to climate change										-
to climate change		daptability and measu								-
to climate change No	e, their future a	daptability and measu								-
to climate change No Short Response	Not Answered	daptability and measu								-
to climate change No Short Response	Not Answered	daptability and measu								-
to climate change No  Short Response Explanation  Choice	Not Answered Not Answered 2 B	daptability and measu		people with vary	ying needs, a	age and mo	bility issues	as a key part	of their la	youts Yes /
to climate change No  Short Response Explanation  Choice  We want to revis	Not Answered Not Answered 2 B	daptability and measu	ires to address accessibility for	people with vary	ying needs, a	age and mo	bility issues	as a key part	of their la	youts Yes /
to climate change No  Short Response Explanation  Choice  We want to revis	Not Answered Not Answered 2 B	n density to ensure tha	ires to address accessibility for	people with vary	ying needs, a	age and mo	bility issues	as a key part	of their la	youts Yes /
to climate change No  Short Response Explanation  Choice  We want to revis Yes / No	Not Answered Not Answered  2 B e our policies o	n density to ensure that	ires to address accessibility for	people with vary	ying needs, a	age and mo	bility issues	as a key part	of their la	youts Yes /

<b>Customer Ref:</b>	00009 R	Response Ref:	ANON-KU2U-GPEE-8	Supporting Info		
Name	Callum Fraser (Iceni F	Projects)		Email CFraser@i	ceniprojects.com	
Response Type	Agent / Consultant					
On behalf of:	West Craigs Ltd					
Choice	2 C					
We want to revise	e our design and layou	t policies to ach	ieve ensure their layouts deliv	er active travel and connec	tivity links. Do you agree with this? - Yes / No	
<b>Short Response</b>	Not Answered					
Explanation	Not Answered					
Choice	2 D					
	lopment, including stu agree with this? - Yes		o deliver quality open space ar	nd public realm, useable for	a range of activities, including drying space, withou	ut losing
Short Response	Not Answered					
Explanation	Not Answered					
Chaine	2.4					
Choice	3 A				Attick Building Beaudations Instead	
	_		rd. Which standard should new		ottish Building Regulations. Instead we could requirence: The meet? - Which standard?	e new
-						
Short Response	Not Answered					
Explanation	Not Answered					
	,					

Customer Ref:	00009	Response Ref:	ANON-KU2U-GPEE-8	Suppo	orting Info				
Name	Callum Fraser	(Iceni Projects)		Email	CFraser@ic	eniprojects	.com		
Response Type	Agent / Consu	ıltant							
On behalf of:	West Craigs Lt	td							
Choice	4 A								
			ace Briefs for areas and sites w	•		ting the ke	y elements of	design, layout	t, and transport,
education and ne	aithcare infrast	ructure development	should deliver. Do you agree w	ith this? - Yes /	NO				
Cl. 1 D									
Short Response	Not Answered								
Explanation	Not Answered								
Choice	4 B								
			by our communities. City Plan 2 with local communities to prep			lace Plans o	an help us ac	hieve great pla	ices and support
Short Response	Not answered								
Explanation	Not Answered								
·									
Choice	5 A								
•		•	re there is existing infrastructu d deliverable within the plan p		•	-		:ainable transp	ort, or where
potential new iiii	rastractare wiii	be decommodated an	a deliverable within the plan p	eriou. Do you u	Bicc with thi	15. 16371	10		
Short Posnonso	Not Answered								
Short Response	Not Answered								
Explanation	Not Answered								

Customer Ref:	00009 Response Ref: ANON-KU2U-GPEE-8	Supporting Info
Name	Callum Fraser (Iceni Projects)	Email CFraser@iceniprojects.com
Response Type	Agent / Consultant	
On behalf of:	West Craigs Ltd	
Choice	5 B	
•	in 2030 to set out where new community facilities are needed, and thood sustainable public transport services. Do you agree with this? - Ye	at these must be well connected to active travel routes and in locations with high
accessibility to go	bod sustainable public transport services. Do you agree with this? - Ye	es / NO
Short Response	Not Angword	
Explanation	Not Answered	
LAPIAHACIOH	Not Allsweled	
Choice	5 C	
	ct the desire to co-locate our community services close to the commu gree with this? - Yes / No	unities they serve, supporting a high walk-in population and reducing the need to
Short Response	Not Answered	
Explanation	Not Answered	
Choice	5 D1	
		vard new or expanded community infrastructure. Do you agree with this? - Yes / No
Short Response	Not Answered	
Explanation	Not Answered	

Customer Ref:	00009 Response Ref: ANON-KU2U-GPEE-8	Supporting Info
Name	Callum Fraser (Iceni Projects)	Email CFraser@iceniprojects.com
Response Type	Agent / Consultant	
On behalf of:	West Craigs Ltd	
Choice	5 D2	
We want to use o	umulative contribution zones to determine infrastructure actions,	costs and delivery mechanisms. Do you agree with this? - Yes / No
Short Response	Not Answered	
Explanation	Not Answered	
Choice	5 E	
We want to stop you agree with th		contributions within the plan, Action Programme and in non-statutory guidance. Do
Short Response	Not Answered	
Explanation	Not Answered	
Ob at a		
Choice	6 A	
	te a new policy that assesses development against its ability to mee current or planned public transport services and high-quality active	et our targets for public transport usage and walking and cycling. These targets will vary e travel routes. Do you agree with this? - Yes / No
Short Response	Not Answered	
Explanation	Not Answered	

Customer Ref:	00009	Response Ref:	ANON-KU2U-GPEE-8	Supporting Info		
Name	Callum Frase	r (Iceni Projects)		Email CFraser@io	ceniprojects.com	
Response Type	Agent / Cons	ultant				
On behalf of:	West Craigs L	.td				
Choice	6 B					
			by walking, cycling and puic transport. Do you agree		and planned transit interventions. This w	ill determine
appropriate park	ing levels to su	pport night use of publi	ic transport. Do you agree	with this: - res / No		
Short Response	Not Answered					
Explanation	Not Answered					
Explanation	NOT Allswelled					
Choice	7 A					
	-			oy walking, cycling and public tra ng. Do you agree with this? - Yes	insport. These targets could be set by are s / No	ea, development
<b>Short Response</b>	Not Answered					
Explanation	Not Answered					
Choice	7 B					
We want to prote you agree with the	_	development of additi	onal car parking in the city	centre to support the delivery of	of the Council's city centre transformation	n programme. Do
Short Response	Not Answered					
Explanation	Not Answered					

Customer Ref:	00009	Response Ref:	ANON-KU2U-C	GPEE-8	Suppo	rting Info					
Name	Callum Frasei	(Iceni Projects)			Email	CFraser@ice	eniprojects	.com			
Response Type	Agent / Consi	ultant									
On behalf of:	West Craigs L	td									
Choice	7 C										
We want to upda agree with this? -		policies to control de	emand and to sup	port parking for	bikes, those w	ith disabilitie	s and elect	ric vehicles v	ia charging ir	nfrastructure.	Do you
Short Response	Not Answered										
Explanation	Not Answered										
Choice	7 D										
Mobility Plan or i	ts action plan. I	ork and ride infrastru  Do you agree with the sites that are identifi	is? - We want to	support the city	s park and ride						
Short Response	Not Answered										
Explanation	Not Answered										
Choice	8 A										
We want to upda	te our policy o	n the Cycle and Foot	oath Network to p	provide criteria f	or identifying r	new routes. D	Oo you agre	e with this?	- Yes / No		
Short Response	Not Answered										
Explanation	Not Answered										

Customer Ref:	00009	Response Ref:	ANON-KU2U-GPEE-8	Supporting Info		
Name	Callum Fraser (Ice	eni Projects)		Email CFraser@ic	eniprojects.com	
Response Type	Agent / Consultar	nt				
On behalf of:	West Craigs Ltd					
Choice	8 B					
					d cycling links around the city, we want to y are delivered. Do you agree with this?	
<b>Short Response</b>	Not Answered					
Explanation						
Choice	8 C					
to include any ne	_	ravel links which m	nay be identified in the forthco		otions for allocated sites. We also want t ort Appraisal, the City Mobility Plan, or w	-
<b>Short Response</b>	Not Answered					
Explanation	Not Answered					
Choice	8 C					
to include any ne	w strategic active t	ravel links which m	_		otions for allocated sites. We also want to ort Appraisal, the City Mobility Plan, or w	•
Short Response	No					
Explanation						

Customer Ref:	00009	Response Ref:	ANON-KU2U-GPEE-8	Supp	orting Info				
Name	Callum Fraser	(Iceni Projects)		Email	CFraser@ice	eniprojects.cor	n		
Response Type	Agent / Consul	tant							
On behalf of:	West Craigs Ltd	d	-						
Choice	9 A								
	_		s of Edinburgh, as a 'Short Tree with this approach? - Ye		ea' where pla	nning permiss	ion will always b	e required for	the change of
<b>Short Response</b>	Not Answered								
Explanation	Not Answered								
Choice	9 B								
			o alternative uses. This nev				is required for a	a change of use	e of residential
Short Response	Not Answered								
Explanation	Not Answered								
Choice	10 A								
		•	housing. We want to ensu		using is delive	red at the righ	t scale and in the	e right location	ns, helps create
Short Response	Not Answered								
Explanation	Not Answered	<del></del>							
	,								

Customer Ref:	00009	Response Ref:	ANON-KU2U-GPEE-8	Supporting Info		
Name	Callum Frase	r (Iceni Projects)		Email CFraser@ic	eniprojects.com	
Response Type	Agent / Cons	ultant				
On behalf of:	West Craigs L	_td				
Choice	10 B					
We want to creat this? - Yes / No	e a new policy	framework which sets	out a requirement for housing	on all sites over a certain siz	ze coming forward for development. Do y	ou agree with
Short Response	Not Answered					
Explanation	Not Answered					
Choice	10 C					
		promoting the better uported. Do you agree w		e retail units and commercia	Il centres, where their redevelopment for	mixed use
						J
Short Response	Not Answered					
Explanation	Not Answered					
Choice	11 A					
		increase the provision	of affordable housing require	ment from 25% to 35%. Do v	you agree with this approach? - Yes / No	
	. ,	·				
Short Response	Not Answered					
Explanation	Not Answered	<u></u>				

<b>Customer Ref:</b>	00009 Response Ref:	ANON-KU2U-GPEE-8	Supporting Info	
Name	Callum Fraser (Iceni Projects)		Email CFraser@iceniprojects.com	
Response Type	Agent / Consultant			
On behalf of:	West Craigs Ltd			

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	se Not Answered
Explanation	Not Answered

Customer Ref:	00009	Response Ref:	ANON-KU2U-GF	PEE-8	Suppor	rting Info		
Name	Callum Frase	r (Iceni Projects)			Email	CFraser@ic	eniprojects.com	
Response Type	Agent / Cons	ultant						
On behalf of:	West Craigs I	West Craigs Ltd						

Choice 12 Δ

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

Short Response Not Answered

**Explanation** 

West Craigs Ltd do not support any of the options because none are likely to provide sufficient housing to meet Edinburgh's housing need and demand until 2032. West Craigs Ltd proposes an alternative Option 3 (Blended Approach), which allocates much more land for housing than currently proposed. The justification for this revised approach is outlined below: We have critiqued the approach presented under Choice 12 before reaching our own conclusion as to how many homes are required during the plan period and the most appropriate strategy for their delivery. To determine how many homes to provide during the plan period (to 2032) CEC use the supply targets set by Strategic Development Plan 1 (SDP1), along with the updated Housing Need and Demand Assessment (HNDA2) prepared for Strategic Development Plan 2. SDP1's 'all tenure' target sets out housing demand across South East Scotland to 2032 but does not provide a breakdown by local authority beyond 2024. CEC uses HNDA2 to determine how much of the remaining regional housing target should be met within Edinburgh. Within the City Plan 2030 Housing Study (Jan 2020) Table 1 - Scenarios of Need and Demand 2019-2032 (HNDA2) confirms that, under the adopted Wealth Distribution Scenario, housing need and demand for the City of Edinburgh for the period 2012-2032 is 81.685 homes. Accounting for the 14.511 housing completions between 2012 - 2019. Edinburgh's remaining housing need and demand for the period 2019 to 2032 is 67.174. Within this context Choices for City Plan 2030 presents two housing supply target options: Preferred Option: 43,400 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HNDA 2 Wealth Distribution Scenario (31,772) less completions between 2012 and 2019 (9,184).

Alternative Option: 52,800 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HNDA 2 Strong Economic Growth Scenario (41,116) less completions between 2012 and 2019 (9,184). Either option would fall some way short of meeting housing need and demand in full. Despite the Housing Study identifying Edinburgh's housing need and demand for the plan period as 67,174 the Choices 2030 document provides no justification as to why this target has not been used and cannot be met. The difference between the Council's two options and the actual housing need and demand appears to be a result of the Council's commitment to deliver 20,800 affordable homes between 2019-2032, a figure significantly below the need for 44,586 affordable homes within the same period, as identified by HNDA2 (and specifically referenced within the Housing Study). Having identified a preferred housing supply target, the Choices 2030 document then calculates how much land the emerging plan must provide. It calculates the total land available for housing as follows:Edinburgh's Potential Housing Land (2019)Land identified in housing land audit for affordable housing 6,100Land identified in housing land audit for market housing 14,800Other land in housing land audit (without consent) 9,200Potential urban area land identified through Housing Study 16,900Total potential land available for housing 47,000In short, CEC consider there to be sufficient land for c 30,100 homes (based upon the 2019 Housing Land Audit). However we note that around 25% of this land (c 7,468 homes) is recognised by CEC as being constrained. This calculation also includes potential for an additional 16,900 homes on land within the urban area as identified by the Housing Study, which we consider below. In support of CEC's preferred housing supply target, Table 1 of the Choices document calculates the additional land that must be identified by the City Plan. Its findings are reproduced below: MarketAffordableTotalHousing Supply

<b>Customer Ref:</b>	00009 Response Ref: ANON-KU2U-GPEE-8	Supporting Info
Name	Callum Fraser (Iceni Projects)	Email CFraser@iceniprojects.com
Response Type	Agent / Consultant	
On behalf of:	West Craigs Ltd	

Target 22,60020,800 43,400Current Land Supply

30,164Effective 22,696Constrained 7,468Additional land to find

(+10% flexibility) 17,600To deliver these additional 17,600 homes, three potential spatial strategies are proposed: • 17,600To deliver these additional 17,600 homes, three potential spatial strategies are proposed: • 17,600To deliver these additional 17,600 homes, three potential spatial strategies are proposed: • 17,600To deliver these additional 17,600 homes, three potential spatial strategies are proposed: • 17,600To deliver these additional 17,600 homes, three potential spatial strategies are proposed: • 17,600To deliver these additional 17,600 homes, three potential spatial strategies are proposed: • 17,600To deliver these additional 17,600 homes, three potential spatial strategies are proposed: • 17,600To deliver these additional 17,600 homes, three potential spatial strategies are proposed: • 17,600To deliver these additional 17,600 homes, three potential spatial strategies are proposed: • 17,600To deliver these additional 17,600 homes, three potential spatial strategies are proposed: • 17,600To deliver the spatial

Delivery by the Council and its partners within the urban area Dotion 2: Delivery through market housing by releasing greenfield land Dotion 3: A blended approach CEC advocates Option 1 - Delivery by the Council and its partners within the urban area. In support of this the Choices document identifies 275 hectares of current employment land as the only locations for future housing development. The success of this approach depends upon a range of commercial factors largely out with the Council's control, indeed the Choices document specifically recognises that "this approach may not be financially viable" and may "require a significant CPO programme to ensure land comes forward". It is notable that of the 275 hectares of urban land identified as potentially suitable for housing-led development, only 11 hectares is vacant and ready for development whilst only 30 hectares benefits from planning permission for residential development. The remainder of the land is currently in active alternative use – predominantly business/employment related. The deliverability of these sites does not appear to have been considered in any detail by the Housing Study and remains highly speculative. Important basic information about the sites appears to be unknown - including their ownership and whether the owner is interested in selling / developing the site. On this basis these sites fail to meet the assessment of 'effectiveness' test contained within PAN2/2010: Affordable Housing and Housing Land Audits. Many of the areas and sites identified will be multi-owned and multi-let industrial estates, further complicating issues relating to land assembly. Despite this lack of information, the preferred option envisages these sites delivering 16,900 new homes between 2019 and 2032. Neither is it clear whether the likely knock-on effects of pursuing such a strategy have been considered, for example a shortage of business/employment land and associated economic impact, a scenario where small-medium business/industrial occupiers are pushed out of town resulting in an unsustainable pattern of development, increased commuting etc. As the Council admits, its preferred approach "includes land for small businesses and land owned by the MOD, Police, and NHS Lothian". The priority given to urban as opposed to greenfield land is recognised as a means of making efficient use of existing infrastructure and services. However, if City Plan 2030 wishes to deliver the 67,174 homes required to meet Edinburgh's remaining housing need and demand then Option 1 will not realistically achieve this. An alternative approach must be pursued if Edinburgh's housing need and demand is to be met.

West Craigs Ltd has expressed support for an alternative Option 3 which proposes a mix of urban area and greenfield land to deliver new homes. The Choices document proposes "a mix of the urban area land (approx. 11,000 units) and greenfield land (approx. 6,600 units)". It is clear that significantly more greenfield land will need to be allocated than is currently proposed. West Craigs Ltd considers that the alternative housing supply target option of 52,800 homes between 2019-32 should be adopted, albeit recognising that this option remains below the unmet housing need and demand from 2019 to 2032 identified by HNDA2. By adopting the alternative housing supply target the land to be allocated by the emerging City Plan can be calculated as follows: Housing Supply Target 52,80010% flexibility 5,280 Housing Land Requirement 58,080 Effective Supply 22,696 Land to be allocated in City Plan 2030 35,384 On this basis, City Plan 2030 will be required to allocate new housing land with an indicative capacity of 35,000 homes. Even if the delivery of 11,000 homes on urban area land is achievable, which is highly speculative, additional greenfield land with development capacity for approximately 24,000 homes would still be required. Assuming that the five potential greenfield sites identified by the Choices document are released – providing indicative development capacity of 6,600 – greenfield land with capacity for a further 18,000 homes must be identified in order to meet the appropriate housing supply target for the plan period. For the reasons

presented, West Craigs Ltd supports an alternative Option 3, amended in order to allocate around 35,000 homes on both Brownfield and Greenfield sites. See

<b>Customer Ref:</b>	00009 Response Ref: ANON-KU2U-GPEE-8	Supporting Info
Name	Callum Fraser (Iceni Projects)	Email CFraser@iceniprojects.com
Response Type	Agent / Consultant	
On behalf of:	West Craigs Ltd	
	supporting doc.	
Choice	12 B1	
Do you support o	r object to any of the proposed greenfield areas? (Please tick all that	apply) - Support Greenfield - Support - Calderwood
<b>Short Response</b>	Not Answered	
Explanation		
Choice	12 B2	
	12 B2  r object to any of the proposed greenfield areas? (Please tick all that	apply) - Support Greenfield - Support - Kirkliston
		apply) - Support Greenfield - Support - Kirkliston
Do you support o	r object to any of the proposed greenfield areas? (Please tick all that	apply) - Support Greenfield - Support - Kirkliston
Do you support o	r object to any of the proposed greenfield areas? (Please tick all that	apply) - Support Greenfield - Support - Kirkliston
Do you support o	r object to any of the proposed greenfield areas? (Please tick all that	apply) - Support Greenfield - Support - Kirkliston
Do you support o	r object to any of the proposed greenfield areas? (Please tick all that	apply) - Support Greenfield - Support - Kirkliston
Do you support of Short Response Explanation	r object to any of the proposed greenfield areas? (Please tick all that  Not Answered	apply) - Support Greenfield - Support - Kirkliston
Do you support of Short Response Explanation	not Answered  12 B3	
Do you support of Short Response Explanation	r object to any of the proposed greenfield areas? (Please tick all that  Not Answered	
Do you support of Short Response Explanation  Choice  Do you support of Short Response Explanation	Not Answered  12 B3  Trobject to any of the proposed greenfield areas? (Please tick all that	
Do you support of Short Response Explanation  Choice  Do you support of Short Response Explanation	not Answered  12 B3	

<b>Customer Ref:</b>	00009 Response Ref: ANON-KU2U-GPEE-8	Supporting Info
Name	Callum Fraser (Iceni Projects)	Email CFraser@iceniprojects.com
Response Type	Agent / Consultant	
On behalf of:	West Craigs Ltd	
Choice	12 B4	
Do you support o	r object to any of the proposed greenfield areas? (Please tick all tha	at apply) - Support Greenfield - Support - East of Riccarton
Short Response Explanation	Not Answered	
Choice	12 B5	
Do you support o	r object to any of the proposed greenfield areas? (Please tick all tha	at apply) - Support Greenfield - Support - South East Edinburgh
Short Response Explanation	Not Answered	
Explanation Choice	12 B6	
Explanation Choice		at apply) - Support Greenfield - Object - Calderwood

Customer Ref:	00009	Response Ref:	ANON-KU2U-GPEE-8	Suppo	rting Info		
Name	Callum Fraser (Ice	eni Projects)		Email	CFraser@iceniproje	ects.com	
Response Type	Agent / Consultan	nt					
On behalf of:	West Craigs Ltd						
Choice	12 B7						
Do you support o	or object to any of th	ne proposed green	nfield areas? (Please tick all tha	t apply) - Suppo	rt Greenfield - Objec	t - Kirkliston	
Short Response	Not Answered						
Explanation							
Choice	12 B8						
		ne proposed green	nfield areas? (Please tick all tha	it apply) - Suppo	rt Greenfield - Objec	t - West Edinburgh	
		ne proposed green	nfield areas? (Please tick all tha	t apply) - Suppo	rt Greenfield - Objec	t - West Edinburgh	
Do you support o	or object to any of th	ne proposed green	nfield areas? (Please tick all tha	t apply) - Suppo	rt Greenfield - Objec	t - West Edinburgh	
Do you support o	or object to any of th	ne proposed green	nfield areas? (Please tick all tha	t apply) - Suppo	rt Greenfield - Objec	t - West Edinburgh	
Do you support o	or object to any of th	ne proposed green	nfield areas? (Please tick all tha	t apply) - Suppo	rt Greenfield - Objec	t - West Edinburgh	
Do you support o	or object to any of th	ne proposed green	nfield areas? (Please tick all tha	t apply) - Suppo	rt Greenfield - Objec	t - West Edinburgh	
Do you support of Short Response Explanation	Not Answered	ne proposed green	nfield areas? (Please tick all tha	t apply) - Suppo	rt Greenfield - Objec	t - West Edinburgh	
Do you support of Short Response Explanation	Not Answered  12 B9						
Do you support of Short Response Explanation	Not Answered  12 B9		nfield areas? (Please tick all tha				
Do you support of Short Response Explanation  Choice  Do you support of	Not Answered  12 B9 or object to any of the						
Do you support of Short Response Explanation  Choice  Do you support of	Not Answered  12 B9 or object to any of the						

Customer Ref:	00009	Response Ref:	ANON-KU2U-GPEE-8	Supportin	ng Info				
Name	Callum Fraser (	(Iceni Projects)	Email CF	raser@ice	niprojects.	com			
Response Type	Agent / Consul	tant							
On behalf of:	West Craigs Ltd	d							
Choice	12 B10								
Do you support o	r object to any o	f the proposed green	field areas? (Please tick all tha	t apply) - Support G	Greenfield -	- Object - S	outh East Edin	burgh	
<b>Short Response</b>	Not Answered								
Explanation									
Choice	12 BX								
Do you support o	r object to any o	f the proposed green	field areas? (Please tick all tha	t apply) - Explain w	hy				
Do you support o	r object to any o	f the proposed green	field areas? (Please tick all tha	t apply) - Explain w	hy				
	r object to any o	f the proposed green	field areas? (Please tick all tha	t apply) - Explain w	hy				
	-	f the proposed green	field areas? (Please tick all tha	t apply) - Explain w	hy				
Short Response	-	f the proposed green	field areas? (Please tick all tha	t apply) - Explain w	hy				
Short Response	-	f the proposed green	field areas? (Please tick all tha	t apply) - Explain w	hy				
Short Response	-	f the proposed green	field areas? (Please tick all tha	t apply) - Explain w	hy				
Short Response Explanation Choice	Not Answered  12 C		field areas? (Please tick all tha		hy				
Short Response Explanation Choice	Not Answered  12 C				hy				
Short Response Explanation Choice	Not Answered  12 C eenfield site you				hy				
Short Response Explanation Choice Do you have a green	Not Answered  12 C eenfield site you				hy				
Short Response Explanation  Choice  Do you have a grown Short Response	Not Answered  12 C eenfield site you				hy				

<b>Customer Ref:</b>	00009	Response Ref:	ANON-KU2U-	GPEE-8	Suppo	rting Info	
Name	Callum Fraser (Ice	ni Projects)	L		Email	CFraser@iceniprojects.com	
Response Type							
On behalf of:	West Craigs Ltd	<u>-</u>					
On Benan or.	West Claigs Ltu						 
Choice	12 C						
Do you have a gr	eenfield site you wis	sh us to consider i	n the proposed	l Plan? - Greenfi	eld file upload		
Short Response	Yes						
Explanation							
Choice	12 C						
Do you have a gr	eenfield site you wis	sh us to consider i	n the proposed	l Plan? - Greenfi	eld file upload		
<b>Short Response</b>	No						
Explanation							
Choice	12 D						
	ownfield site you wi	ish us to consider	in the proper	d Dlan 2 Proum	field sites uplead	1	
Do you nave a br	ownfield site you wi	sn us to consider	in the propose	d Plan? - Brown	field sites upload	<b>1</b>	
<b>Short Response</b>	No						
Explanation							

<b>Customer Ref:</b>	00009	Response Ref:	ANON-KU2U-GPEE-8	Supporting Info
Name	Callum Fraser	(Iceni Projects)		Email CFraser@iceniprojects.com
Response Type	Agent / Consu	ıltant		
On behalf of:	West Craigs L	td		
Choice	13 A			
			for social enterprises, star agree with this? - Yes / No	t-ups, culture and tourism, innovation and learning, and the low carbon sector, where there

## Choice 14 A

**Explanation** 

Short Response Not Answered

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 Not Answered

Not Answered

**Explanation** 

Broadly supportive of 'an area of search' which would allow a wide consideration of future uses within West Edinburgh. As part of any search it is important to identify individual, sustainable sites in City Plan 2030 which can support additional housing - the land to the north of Craigs Road being an ideal candidate. The Local Development Plan is responsible for identifying enough land to deliver the required number of homes to meet housing need and demand. As evidence within our response to Question 12A the strategy presented by the Choices document will not achieve this and significant additional greenfield release is required. Land within the West Edinburgh SDA should be a key focus for additional greenfield release given the existing public transport infrastructure it benefits from. West Craigs Ltd's land is a highly sustainable and accessible site within West Edinburgh and should be identified for housing development within City Plan 2030.

<b>Customer Ref:</b>	00009	Response Ref:	ANON-KU2U-GPEE-8	Supporting Info		
Name	Callum Fraser	(Iceni Projects)		Email CFraser@io	ceniprojects.com	
Response Type	Agent / Consu	ltant				
On behalf of:	West Craigs Lt	d				
Choice	14 B					
We want to remove you agree with this			for the Royal Highland Showgi	ound site to the south of th	e A8 at Norton Park and allocate the site	for other uses. Do
you agree with thi	із арргоасії.	237 110				
Short Response	Not Answered					
Explanation	140074113WCTCU					
	14 C					
-		te the Airport's contin his approach? - Yes / I		s runway" for the developm	nent of alternative uses next to the Edinb	urgh Gateway
Short Response	Not Answered					
Explanation						
Choice	15 A					
		actional (town contro	first' approach City Plan 2020	will protect and enhance th	e city centre as the regional core of south	a cast Scotland
			ment and tourism activities. Do			i east scotland
Short Response	Not Answered					
Explanation	Not Answered					

Customer Ref:	00009	Response Ref:	ANON-KU2U-GPEE-8	Suppo	rting Info					
Name	Callum Fraser (Ice	eni Projects)		Email	CFraser@ice	eniprojects	.com			
Response Type	Agent / Consultan	nt								
On behalf of:	West Craigs Ltd		,							
Choice	15 B									
	•	•	owed within our town a mitted only in areas wh					-		-
<b>Short Response</b>	Not Answered									
Explanation	Not Answered									
Choice	15 C									
	_		including the potential the outcomes of the City			-	ges where th	ey support wal	king and cycling	g
<b>Short Response</b>	Not Answered									
Explanation	Not Answered									
Choice	15 D									
balance of uses w	ithin our centres to	maintain their vit	ntary guidance for our ality, viability and delivide you support? - Yes	er good placemaking. I		-				
	•									
Short Response	Not Answered									
Explanation	Not Answered									

Customer Ref:	00009 Response Ref: ANON-KU2U-GPEE-8	Supporting Info
Name	Callum Fraser (Iceni Projects)	Email CFraser@iceniprojects.com
Response Type	Agent / Consultant	
On behalf of:	West Craigs Ltd	
Choice	15 E	
We want to supp this approach? - \		er locations with good public transport access throughout Edinburgh. Do you agree with
Short Response	Not Answered	
Explanation	Not Answered	
Choice	15 G	
	ek to reduce the quantity of retail floorspace within centres in favorany growing demand. Do you agree with this approach? - Yes / No	ur of alternative uses such as increased leisure provision and permit commercial centres
	70 - 0 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	
Short Response	Not Answered	
Explanation	Not Answered	
	riotrial district ea	
Choice	16 A1	
	inue to support office use at strategic office locations at Edinburgh.  Do you agree? - Yes / No	Park/South Gyle, the International Business Gateway, Leith, the city centre, and in town
Short Response	Not Answered	
Explanation	Not Answered	
,		

Customer Ref:	00009	Response Ref:	ANON-KU2U-GPEE-8	8 S	upport	ting Info						
Name	Callum Fraser (Ice	eni Projects)		E	mail	CFraser@ic	eniprojec	ts.com				
Response Type	Agent / Consultar	nt										
On behalf of:	West Craigs Ltd											
	-			•								
Choice	16 A2											
We want to supp	ort office developm	nent at commercia	centres as these also	o provide accessible	locatio	ns Yes /	No					
Short Response	Not Answered											
Explanation	Not Answered	•										
Choice	16 A3											
We want to stren	gthen the requirem	ent within the city	centre to provide si	ignificant office floor	space v	within majo	or mixed-	use deve	elopments. [	Do you agre	e? - Yes / N	lo
Short Response	Not Answered											
Explanation	Not Answered	·										
Choice	16 A4											
We want to ame	nd the boundary of	the Leith strategic	office location to rer	move areas with resi	dentia	l developm	ent conse	ent. Do y	ou agree? -	Yes / No		
Short Response	Not Answered											
Explanation	Not Answered	·										
-	1											

<b>Customer Ref:</b>	00009	Response Ref:	ANON-KU2U-GPEE-8	Suppo	rting Info			
Name	Callum Fraser	(Iceni Projects)		Email	CFraser@ice	eniprojects	.com	
Response Type	Agent / Consu	ıltant						
On behalf of:	West Craigs Lt	td						
Choice	16 A5							
We want to conti	nue to support	office development in	other accessible locations else	where in the u	ban area. Do	you agree	? - Yes / No	
Short Response	Not Answered							
Explanation	Not Answered							
Choice	16 A5							
We want to conti consider in the pr		office development in	other accessible locations else	where in the u	ban area. Do	you agree	? - Do you have an office site	e you wish us to
Short Response								
Explanation								
Choice	16 B							
We want to ident	ify sites and loc	cations within Edinbur	gh with potential for office dev	elopment. Do y	ou agree wit	h this? - Ye	es/No	
Short Response	Not Answered							
Explanation	Not Answered	1						

Customer Ref:	00009	Response Ref:	ANON-KU2U-GPEE-8	Supporting Info		
Name	Callum Fraser (Icer	ni Projects)		Email CFraser@io	ceniprojects.com	
Response Type	Agent / Consultant	t				
On behalf of:	West Craigs Ltd					
Choice	16 C					
use, unless existir	ng office space is pro	ovided as part of o	lenser development. This wou	ld apply across the city to re	e redevelopment of office buildings other than for office ecognise that office locations outwith the city centre and office' policy only in the city centre Yes / No	
Short Response	Not Answered					
Explanation	Not Answered					
Choice	16 E1					
	ify proposals for new rategic Business Cen		ss and industrial sites to provide	e necessary floorspace at th	e following locations. Do you agree? - Yes / No -	
Short Response Explanation	Not Answered					
Choice	16 E2					
We want to ident Support - Newbri		w modern busines	ss and industrial sites to provide	e necessary floorspace at th	e following locations. Do you agree? - Yes / No -	
Short Response Explanation	Not Answered					

Customer Ref:	00009	Response Ref:	ANON-KU2U-GPEE-8	Supporting Info		
Name	Callum Fraser (Icen	ni Projects)		Email CFraser@ico	eniprojects.com	
Response Type	Agent / Consultant					<del></del> .
On behalf of:	West Craigs Ltd					
	,					
Choice	16 E3					
	fy proposals for new ighall Industrial Esta		s and industrial sites to provid	e necessary floorspace at the	e following locations. Do you agree? - Yo	es / No -
Short Response Explanation	Not Answered					
Choice	16 E4					
We want to identi Support - The Cro		v modern busines	s and industrial sites to provid	e necessary floorspace at the	e following locations. Do you agree? - Yo	es / No -
Short Response Explanation	Not Answered					
Choice	16 E5					
	fy proposals for new rategic Business Cent		s and industrial sites to provid	e necessary floorspace at the	e following locations. Do you agree? - Yo	es / No - Do not
Short Response Explanation	Not Answered					

<b>Customer Ref:</b>	00009	Response Ref:	ANON-KU2U-GP	EE-8	Supp	orting Info						
Name	Callum Fraser (Icer	ni Projects)			Email	CFraser@io	ceniproj	ects.com				
Response Type	Agent / Consultant											
On behalf of:	West Craigs Ltd											
Choice	16 E6											
We want to identi support - Newbrid	fy proposals for nev Ige	v modern busines	ss and industrial si	ites to provide	necessary flo	orspace at th	e follow	ing locat	ons. Do yo	ou agree? - '	Yes / No -	Do not
Short Response Explanation	Not Answered											
Choice	16 E7											
	fy proposals for new ghall Industrial Esta		ss and industrial si	ites to provide	necessary flo	orspace at th	e follow	ing locat	ons. Do yo	ou agree? - '	res / No -	Do not
Short Response Explanation	Not Answered											
Choice	16 E8											
We want to identi support - The Cros	fy proposals for nev sswinds Runway	v modern busines	ss and industrial si	ites to provide	necessary flo	orspace at th	e follow	ing locat	ons. Do yo	ou agree? - '	Yes / No -	Do not
Short Response	Not Answered											

Explanation

<b>Customer Ref:</b>	00009 Response Ref: ANON-KU2U-GPEE-8	Supporting Info
Name	Callum Fraser (Iceni Projects)	Email CFraser@iceniprojects.com
Response Type	Agent / Consultant	
On behalf of:	West Craigs Ltd	
Choice	16 EX	
We want to ident	tify proposals for new modern business and industrial sites to p	rovide necessary floorspace at the following locations. Do you agree? - Explain why
Short Response	Not Answered	
Explanation	Not Answered	
Choice	16 F	
		t 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	t of urban sites and considered in Place Briefs for greenfield sites. We want to set out the business space, and how to deliver it, including the location on-site, and considering
amount expected		
amount expected adjacent uses, se	d to be re-provided, clearer criteria on what constitutes flexible rvicing and visibility. Do you agree? - Yes / No	
amount expected adjacent uses, se	to be re-provided, clearer criteria on what constitutes flexible rvicing and visibility. Do you agree? - Yes / No  Not Answered	
amount expected adjacent uses, se	d to be re-provided, clearer criteria on what constitutes flexible rvicing and visibility. Do you agree? - Yes / No	
amount expected adjacent uses, se Short Response Explanation	to be re-provided, clearer criteria on what constitutes flexible rvicing and visibility. Do you agree? - Yes / No  Not Answered  Not Answered	
amount expected adjacent uses, se Short Response Explanation	to be re-provided, clearer criteria on what constitutes flexible rvicing and visibility. Do you agree? - Yes / No  Not Answered  Not Answered  16 G	e business space, and how to deliver it, including the location on-site, and considering
amount expected adjacent uses, se Short Response Explanation	to be re-provided, clearer criteria on what constitutes flexible rvicing and visibility. Do you agree? - Yes / No  Not Answered  Not Answered  16 G	
amount expected adjacent uses, see Short Response Explanation  Choice  We want to continue	Not Answered  Not Answered  16 G  inue to protect industrial estates that are designated under ou	e business space, and how to deliver it, including the location on-site, and considering
amount expected adjacent uses, see Short Response Explanation  Choice  We want to continue Short Response	Not Answered	e business space, and how to deliver it, including the location on-site, and considering
amount expected adjacent uses, see Short Response Explanation  Choice  We want to continue	Not Answered  Not Answered  16 G  inue to protect industrial estates that are designated under ou	e business space, and how to deliver it, including the location on-site, and considering
amount expected adjacent uses, see Short Response Explanation  Choice  We want to continue Short Response	Not Answered	e business space, and how to deliver it, including the location on-site, and considering

<b>Customer Ref:</b>	00009	Response Ref:	ANON-KU2U-GPEE-8	Supporting Info		
Name	Callum Frase	r (Iceni Projects)		Email CFraser@icenip	rojects.com	
Response Type	Agent / Cons	ultant				
On behalf of:	West Craigs L	td				
Choice	16 H					
We want to intro	duce a policy th	nat provides criteria fo	or locations that we would su	pport city-wide and neighbourhoo	d goods distribution hubs. Do you a	agree? - Yes / No
Short Response	Not Answered					
Explanation	Not Answered					



## Land North of Craigs Road, Edinburgh

Response to Choices for City Plan 2030

Iceni Projects Limited on behalf of West Craigs Ltd

April 2020

## Iceni Projects

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#### 1. INTRODUCTION

- 1.1 This statement has been prepared by Iceni Projects on behalf of West Craigs Ltd. It should be read in association with West Craigs Ltd's representations to the Choices for City Plan 2030 consultation which have been submitted via the online survey.
- 1.2 For the reasons presented in the following sections West Craigs Ltd requests that the land North of Craig's Road ("the site") be removed from the green belt and allocated for housing development within City Plan 2030.
- 1.3 In support of this, the statement provides details of the site, the development opportunity it presents and justification for its proposed allocation within City Plan 2030. This includes specific analysis of the housing land supply targets and strategy for delivery put forward by the Choices document alongside commentary on the 'Greenfield Site Assessment' presented by the City Plan 2030 Housing Study (Part 2b, p 23-24).
- 1.4 This statement has been informed by input from the wider project team, including:

Yeoman McAllister (Design)

• ARUP (Transportation Planning)

Ironside Farrar (Environmental)

Goodsons (Drainage and Flooding)

1.5 As this submission will highlight, the land to the north of Craigs Road represents an appropriate candidate for greenfield release. It provides an opportunity for a sustainable housing development with an indicative capacity of 350-500 homes. The site is 'effective and can make an important contribution to the delivery of new homes and the ongoing maintenance of a 5-year housing land supply during the City Plan period.

#### 2. CONTEXT FOR ADDITIONAL GREENFIELD RELEASE

- 2.1 At the outset, it is important to establish the context for additional greenfield release.
- 2.2 Choice 12 within the consultation document relates to 'Building our new homes and infrastructure'. It presents the Council's preferred options in terms of how many new homes Edinburgh needs, who delivers the land required for these homes, and how they will be delivered in the most sustainable way.
- 2.3 This section of the report critiques the approach presented by CEC under Choice 12 before reaching its own conclusion as to how many homes are required during the plan period and the most appropriate strategy for their delivery.
- 2.4 To determine how many homes to provide during the plan period (to 2032) CEC use the supply targets set by Strategic Development Plan 1 (SDP1), along with the updated Housing Need and Demand Assessment (HNDA2) prepared for Strategic Development Plan 2.
- 2.5 SDP1's 'all tenure' target sets out housing demand across South East Scotland to 2032 but does not provide a breakdown by local authority beyond 2024. CEC uses HNDA2 to determine how much of the remaining regional housing target should be met within Edinburgh.
- 2.6 Within the City Plan 2030 Housing Study (Jan 2020) *Table 1 Scenarios of Need and Demand 2019-2032 (HNDA2)* confirms that, under the adopted Wealth Distribution Scenario, housing need and demand for the City of Edinburgh for the period 2012-2032 is 81,685 homes. Accounting for the 14,511 housing completions between 2012 2019, Edinburgh's remaining housing need and demand for the period 2019 to 2032 is **67,174**.
- 2.7 Within this context Choices for City Plan 2030 presents two housing supply target options:

**Preferred Option:** 43,400 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HNDA 2 Wealth Distribution Scenario (31,772) less completions between 2012 and 2019 (9,184).

**Alternative Option**: 52,800 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HNDA 2 Strong Economic Growth Scenario (41,116) less completions between 2012 and 2019 (9,184).

2.8 Either option would fall some way short of meeting housing need and demand in full. Despite the Housing Study identifying Edinburgh's housing need and demand for the plan period as 67,174 the Choices 2030 document provides no justification as to why this target has not been used and cannot

be met. The difference between the Council's two options and the actual housing need and demand appears to be a result of the Council's commitment to deliver 20,800 affordable homes between 2019-2032, a figure significantly below the need for 44,586 affordable homes within the same period, as identified by HNDA2 (and specifically referenced within the Housing Study).

2.9 Having identified a preferred housing supply target, the Choices 2030 document then calculates how much land the emerging plan must provide. It calculates the total land available for housing as follows:

Edinburgh's Potential Housing Land (2019)	
Land identified in housing land audit for affordable housing	6,100
Land identified in housing land audit for market housing	14,800
Other land in housing land audit (without consent)	9,200
Potential urban area land identified through Housing Study	16,900
Total potential land available for housing	47,000

- 2.10 In short, CEC consider there to be sufficient land for c 30,100 homes (based upon the 2019 Housing Land Audit). However we note that around 25% of this land (c 7,468 homes) is recognised by CEC as being constrained. This calculation also includes potential for an additional 16,900 homes on land within the urban area as identified by the Housing Study, which we consider below.
- 2.11 In support of CEC's preferred housing supply target, Table 1 of the Choices document calculates the additional land that must be identified by the City Plan. Its findings are reproduced below:

	Market	Affordable	Total
Housing Supply Target	22,600	20,800	43,400
Current Land Supply			30,164
Effective			22,696
Constrained			7,468
Additional land to find (+10% flexibility			17,600

- 2.12 To deliver these additional 17,600 homes, three potential spatial strategies are proposed:
  - Option 1: Delivery by the Council and its partners within the urban area
  - Option 2: Delivery through market housing by releasing greenfield land
  - Option 3: A blended approach

- 2.13 CEC advocates *Option 1 Delivery by the Council and its partners within the urban area.* In support of this the Choices document identifies 275 hectares of current employment land as the only locations for future housing development.
- 2.14 The success of this approach depends upon a range of commercial factors largely out with the Council's control, indeed the Choices document specifically recognises that "this approach may not be financially viable" and may "require a significant CPO programme to ensure land comes forward".
- 2.15 It is notable that of the 275 hectares of urban land identified as potentially suitable for housing-led development, only 11 hectares is vacant and ready for development whilst only 30 hectares benefits from planning permission for residential development. The remainder of the land is currently in active alternative use predominantly business/employment related.
- 2.16 The deliverability of these sites does not appear to have been considered in any detail by the Housing Study and remains highly speculative. Important basic information about the sites appears to be unknown including their ownership and whether the owner is interested in selling / developing the site. On this basis these sites fail to meet the assessment of 'effectiveness' test contained within PAN2/2010: Affordable Housing and Housing Land Audits.
- 2.17 Many of the areas and sites identified will be multi-owned and multi-let industrial estates, further complicating issues relating to land assembly. Despite this lack of information, the preferred option envisages these sites delivering 16,900 new homes between 2019 and 2032.
- 2.18 Neither is it clear whether the likely knock-on effects of pursuing such a strategy have been considered, for example a shortage of business/employment land and associated economic impact, a scenario where small-medium business/industrial occupiers are pushed out of town resulting in an unsustainable pattern of development, increased commuting etc. As the Council admits, its preferred approach "includes land for small businesses and land owned by the MOD, Police, and NHS Lothian".
- 2.19 The priority given to urban as opposed to greenfield land is recognised as a means of making efficient use of existing infrastructure and services. However, if City Plan 2030 wishes to deliver the 67,174 homes required to meet Edinburgh's remaining housing need and demand then *Option 1 Delivery by the Council and its partners within the Urban Area* will not realistically achieve this. An alternative approach must be pursued if Edinburgh's housing need and demand is to be met.
- 2.20 In response to Question 12A, West Craigs Ltd has expressed support for *Option 3 A Blended Approach* which proposes a mix of urban area and greenfield land to deliver new homes. The Choices document proposes "a mix of the urban area land (approx. 11,000 units) and greenfield land (approx. 6,600 units)".

- 2.21 Whilst this submission supports Option 3, it is clear that significantly more greenfield land will need to be allocated than is currently proposed.
- 2.22 West Craigs Ltd considers that the alternative housing supply target option of 52,800 homes between 2019-32 should be adopted, albeit recognising that this option remains below the unmet housing need and demand from 2019 to 2032 identified by HNDA2.
- 2.23 By adopting the alternative housing supply target the land to be allocated by the emerging City Plan can be calculated as follows:

Housing Supply Target	52,800
10% flexibility	5,280
Housing Land Requirement	58,080
Effective Supply	22,696
Land to be allocated in City Plan 2030	35,384

- 2.24 On this basis, City Plan 2030 will be required to allocate new housing land with an indicative capacity of 35,000 homes. Even if the delivery of 11,000 homes on urban area land is achievable, which is highly speculative, additional greenfield land with development capacity for approximately 24,000 homes would still be required.
- 2.25 Assuming that the five potential greenfield sites identified by the Choices document are released providing indicative development capacity of 6,600 greenfield land with capacity for a further 18,000 homes must be identified in order to meet the appropriate housing supply target for the plan period,
- 2.26 For the reasons presented, West Craigs Ltd supports *Option 3 A Blended Approach* but amended in order to allocate around 35,000 homes on both Brownfield and Greenfield sites.
- 2.27 Having clearly presented the context for the release of additional greenfield land, the remainder of this submission presents the site-specific justification for the allocation of West Craigs Ltd's landholdings for housing within the emerging City Plan.

#### 3. SITE & SURROUNDINGS

- 3.1 West Craigs North Field extends to approximately 24 hectares and is located to the north of Craigs Road. The site and its surrounds are clearly highlighted on the plan provided at Appendix 1.
- 3.2 The site comprises green belt land within the West Edinburgh Strategic Development area, identified by both the Strategic Development Plan and Local Development Plan as a focus for the City Region's growth.
- 3.3 Previously in agricultural use, the site is no longer an economic farming unit. The site contains no significant landscape features of note: hedges, some remnant stone walling and trees line Cammo Walk, while a ditch runs along the northern boundary of the site.
- In terms of topography, most of the site is gently undulating. From a plateau to the north of Craigs Road levels drop significantly towards the north-west from approximately 65 to 30m AOD.
- 3.5 The site is bisected north to south by Cammo Walk. Access to the site can be taken from both Maybury Road and from Craigs Road. In terms of access to the site from Maybury Road it should be noted that in 2016, recognising the likelihood of the site being developed in the future, CEC granted a Deed of Servitude to West Craigs Limited affording legal rights to build a fourth arm of the Bughtlin Roundabout. A copy of the Deed of Servitude is provided at Appendix 2.
- 3.6 The A8 (Glasgow Road), accessible via Maybury Road, is located to the south-east of the site and provides vehicular access to Edinburgh City Centre and Edinburgh Airport. The site is well served by access to established public transport and easily accessible by a range of active travel modes.
- 3.7 The site is bound by Craigs Road to the south and Maybury Road to the east. To the immediate west lies Braehead Quarry, a former City of Edinburgh Council waste facility (safeguarded for waste management use by the Local Development Plan) is in third-party ownership and operating as an organic waste recycling facility,
- 3.8 To the north/north-west lies the Cammo Special Landscape Area (SLA) and Garden and Designed Landscape (GDL). The Cammo Local Nature Reserve (LNR) lies further beyond. Plans detailing the location/extend of these designations are provided at Appendix 3.
- 3.9 To the north-east of the site lies an area of agricultural land within the ownership of the Scottish Government/SASA. We understand the Scottish Government/SASA are considering future disposal of this land for housing development.

- 3.10 The Edinburgh Local Development Plan (LDP) housing allocation HSG 20, Cammo lies to the north beyond the Scottish Government Land. On the 6<sup>th</sup> January 2020, planning permission was granted for a 655-unit residential development (18/01755/FUL) on the site. CALA and David Wilson Homes have since commenced development on the site.
- 3.11 Immediately to the south, beyond Craigs Road, lies the Edinburgh LDP housing allocation HSG19, Maybury. On the 27<sup>th</sup> September 2019, planning permission in principle was granted for a residential development and ancillary uses including commercial development, primary school and associated infrastructure uses (16/04738/PPP). The consent includes provision for a new Craigs Road/ Maybury junction to serve the development. This area is within the Cammo Southern Parkland designation and the principle of development was considered acceptable by all parties, including CEC.
- 3.12 To the immediate south-east, on land forming part of LDP housing allocation HSG19, Taylor Wimpey were granted planning permission in principle for a residential development comprising approximately 250 units on the 3<sup>rd</sup> October 2019 (16/05681/PPP). They have since submitted an AMC application (19/05051/AMC) for 250 homes.
- 3.13 In short, the site is conveniently and sustainably located within an area of significant change where, as a result of ongoing and planned development, the site's immediate surroundings are increasingly urban and dominated by residential use.

#### 4. DEVELOPMENT OPPORTUNITY

#### **Proposed Development**

- 4.1 Given the site's location immediately to the north of LDP housing allocation HSG19, and immediately to the south of HSG20, its release from the green belt and subsequent allocation for housing-led development within City Plan 2030. Its development would be progressed in a logical, sustainable and sensitive manner, consolidating the emerging settlement pattern and affording Edinburgh an improved, robust and defensible Green Belt boundary.
- 4.2 Analysis of landscape context, topography and landform, views, site features and a transport/access appraisal have informed the development strategy being put forward.
- 4.3 The site offers development capacity for approximately 350-500 homes, which can be provided in a range of types and tenures including on-site affordable housing provision. In addition, the site can accommodate associated ancillary use such as local convenience retail use capable of serving the proposed development.
- 4.4 In terms of pedestrians and cyclists, the site is bisected by Cammo Walk which acts as a suitable route for pedestrians and cyclists. Cammo Walk and the associated Green Corridor linked to the delivery of the HSG19 and HSG20 sites will provide the development with unhindered cycle and pedestrian access.
- 4.5 Vehicular access to the site can be taken from both Craigs Road and Maybury Road at Bughtlin Roundabout which can be upgraded to form a fourth arm to the existing roundabout in accordance with the Council's Strategic Transport Actions Table 2a of the LDP Action Programme (Feb 2020) specifically references the proposed 'East Craigs Estate Junction' at Maybury Road/Maybury Drive.
- 4.6 It is notable that CEC is obtaining funding to upgrade Cammo Walk via S.75 agreements with the developers of sites HSG19 and HSG20, extracts from the relevant S.75 Agreements are provided at Appendix 4. The resulting upgrade will connect Cammo Walk to the wider Green Corridor pedestrian/cycle network through the HSG 19 site, effectively providing a direct link between the site and enhanced pedestrian and cycle facilities on Maybury Road, Craigs Road, Turnhouse Road, and active travel connections to the new Maybury Primary School, Craigmount High, Edinburgh Gateway, Edinburgh Park and RBS Gogarburn.
- 4.7 Development of the site will include significant landscape and open space provision, local parks alongside several more informal landscaped areas. Extensive tree planting across the site is envisaged. The approach will be informed and strongly influenced by landscape and visual analysis.

4.8 West Craigs Ltd's development strategy will ensure that the visual effects of housing development would be well contained while appropriate planting will provide mitigation against any anticipated visual impact.

4.9 In terms of the site's relationship to the green belt, it is considered that the site's contribution to green belt objectives is low, and the removal of the site from the Edinburgh green belt would allow a new defensible green belt boundary to be formed.

4.10 Overall, the site's development represents a realistic and deliverable opportunity for a sustainable and integrated settlement expansion. As demonstrated below, the site is effective and capable of accommodating residential development in line with key policy objectives. Its development would consolidate Edinburgh's emerging settlement pattern and provide an improved, robust and defensible Green Belt boundary

#### Site Effectiveness

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

**Ownership**: West Craigs Ltd controls the land. An application for planning permission can be expected in the short-term, resulting in development during the Plan period.

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

**Public Funding:** No public funding would be required to make residential development viable.

**Deliverability:** There are no delivery constraints affecting the site, West Edinburgh is an area of extremely high housing demand where supply has failed to keep pace – in particular the supply of family housing . These factors will ensure the site's development for predominantly family housing will be delivered within the plan period.

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

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

4.12	In short, the site is 'effective' when assessed against the PAN 2/2010 criteria. West Craigs Ltd a committed to the delivery of this site, subject to its allocation within the emerging Local Development Plan and securing all necessary statutory consents.	

## 5. RESPONSE TO GREENFIELD SITE ASSESSMENT

- 5.1 This section provides commentary on and responds to the 'Greenfield Site Assessment' presented by the City Plan 2030 Housing Study (Part 2b, p 23) where a wider area, of which the site forms part, is named as 'Cammo Southern Parkland'.
- 5.2 The conclusion of the Council's Site Assessment is that "the site is not suitable for development due to its poor community infrastructure capacity, poor public transport accessibility, prominent landscape character and contribution to the backdrop of existing housing allocations and strategic green network".
- 5.3 West Craigs Ltd strongly disagrees with this conclusion and would query the robustness of the analysis which has informed it. Analysis provided under the site assessment criteria is inconsistent with CEC's conclusions elsewhere. In places it is inaccurate and fails to account for key factors. Overall the assessment's criticisms of the site are overstated and, upon detailed analysis, unjustified.
- Before responding to the terms of the Site Assessment West Craigs Ltd would question the name given to the site by the Housing Study "Cammo Southern Parkland". Given its existing use and physical relationship to the Cammo Estate this is an inappropriate description which gives a false impression of the site's character.
- The site comprises arable farmland, not parkland. It does not form part of the wider Cammo Estate which is located to the north/north-west. It is also the case that the "Cammo Southern Parkland" area identified by the Housing Study contains Braehead Quarry, a Council Waste Facility. This is demonstrated by the plan provided at Appendix 1.
- 5.6 West Craig Ltd's response to the Site Assessment is presented below under the relevant headings:

#### SDP1 SDA AREAS

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

- As noted by the Council's assessment, the site is located within the West Edinburgh Strategic Development Area. The current Development Plan recognises West Edinburgh as a sustainable location where development should be focussed in order to maintain and support Edinburgh's role as the 'Regional Core'.
- 5.8 As noted above, West Craigs Ltd support 'a blended approach' to the delivery of new homes (the Council's Option 3). This approach requires the identification of "planned green belt release" if housing need and demand is to be met. If Option 2 'Delivery through market housing by releasing

Greenfield land' is taken forward, this will require "a large planned green belt release." In both cases, appropriate and effective land within Strategic Development Areas, such as the site, should be identified for green belt release.

#### **ACTIVE TRAVEL**

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

- 5.9 We disagree with the Council's conclusion that the site does not support travel by foot to identified convenience services. The associated suggestions that access to convenience facilities cannot be improved and that such facilities are unlikely to be provided on the site are not accurate or justified. For further information please refer to the Accessibility Review (ARUP) provided at Appendix 5
- 5.10 Planning Advice Note (PAN) 75 'Planning for Transport' states that 'A maximum threshold of 1600m for walking is broadly in line with observed travel behaviour' for accessibility to local facilities by walking and cycling'. All key local facilities are situated within 1,600m from the site. This is clearly highlighted by the Pedestrian Isochrone plan within the Accessibility Review document (Appendix 5).
- 5.11 The eastern section of the site is located within a 10-minute walk (800m) of the East Craigs Coop store and the Shell Petrol Station, the remainder of the site lies within the 1600m threshold identified by PAN 75. Accessibility is equivalent to that which applies to the consented developments on HSG19 and HSG 20
- 5.12 In terms of improving access to convenience facilities, it is acknowledged that Maybury Road forms a barrier to active travel at present. However, the recently introduced 30mph speed limit, the forthcoming transport infrastructure improvements on Maybury Road, Cammo Walk and Craigs Road linked to the approved development on the HSG 19 & HSG 20 sites and the expansion of the West Edinburgh Active Travel Network will effectively remove Maybury Road as a material barrier to active travel.
- 5.13 These identified and approved interventions will significantly improve travel by foot to convenience facilities within the immediate area, future development on the site has the potential to connect into and further enhance these transport infrastructure improvements. It appears these factors have not been considered by the assessment.
- 5.14 The site's future development can incorporate convenience facilities, this is reflected by the previous submission of a Proposal of Application Notice (PoAN) by West Craigs Ltd (16/05742/PAN) for a residential led development incorporating ancillary uses. It is also the case that site HSG19 includes planning permission for retail facilities.

- 5.15 It is noted that the site assessment's blunt conclusion here is inconsistent with that reached by the East of Millburn Tower assessment which concludes that it 'partially' supports travel by foot to identified convenience centres. This despite the assessment acknowledging that such access "is impeded by the City of Edinburgh Bypass and A8 Gogarburn Junction which lacks controlled or segregated crossings for pedestrians and cyclists and the generally poor walking environment of Glasgow Road."
- 5.16 Overall, contrary to the terms of the site assessment, not only does the site support travel by foot to local convenience services, such access can also be improved in a manner akin to that adopted by the adjacent HSG 19 and HSG 20 sites. Furthermore, the site itself offers the potential to provide such facilities that will be accessible to the HSG 19 and HSG 20 sites and to East Craigs.

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

5.17 We agree with the site assessment which recognises the fact that the site is within walking distance of employment clusters.

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

- 5.18 The site assessment concludes that the site does not have access to the wider cycle network and such access is unlikely to be improved as no suitable interventions have been identified which could serve the site.
- 5.19 This submission has already noted the fact the site is bisected by Cammo Walk, an established and wholly suitable route for cyclists. Upgrade works to Cammo Walk are identified within the LDP Action Programme (Feb 2020) and CEC is obtaining funding towards this via Section 75 agreements with the HSG 19 and HSG 20 developers. The upgraded Cammo Walk will be connected to the Green Corridor and Edinburgh Gateway through site HSG 19 and to enhanced active travel facilities on Maybury Road, Craigs Road and Turnhouse Road. The site will also be accessible to the A8 cycle route and the wider city-wide catchment. A well designed underpass beneath the A8 at Edinburgh Gateway offers good cycle access to employment, retail and other facilities at Edinburgh Park and the Gyle Centre.
- 5.20 The CEC upgrade of Cammo Walk will include a new bridge over the Bughtlin Burn to the HSG 20 development, providing a link to its internal and external cycle facilities that, in turn, will connect into the emerging West Edinburgh Active Travel Network (WEATN).
- 5.21 In short, not only does the site have access to the established cycle network, this access will be significantly improved in the short-medium term following the works to upgrade Cammo Walk, the Green Corridor and to reprioritise Maybury Road. These works are committed and in part CEC-led

initiatives. The site assessment's failure to account for these planned improvements, which will directly serve the site, represents a glaring omission which has resulted in an inaccurate conclusion being reached.

5.22 Please refer to the submitted Accessibility Review (Appendix 5) for further information in this regard.

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

- 5.23 In terms of active travel, the assessment's conclusion is "the site would not support active travel overall, as the site is not within walking distance of local convenience services and these are unlikely to be provided through development due to lack of scope for development nearby. Access to the wider cycle network is poor and it is unlikely to be improved through an identified intervention."
- 5.24 The inaccuracy of this conclusion is clearly demonstrated by the terms of the report on the Taylor Wimpey AMSC application at Craigs Road (19/05051/AMC) prepared for the DM Sub-Committee meeting on the 18<sup>th</sup> March (Appendix 6). At page 16 the report states:
  - "At present the LDP and its Action Programme makes provision for a pedestrian and active travel connection along Cammo Walk to provide a north-south connection between LDP housing allocations HSG 19 and HSG 20 and other destinations in the area. The Council is responsible for delivering part of the active travel route described as 'Cammo to Maybury cycle path'; at the time of writing the LDP Action Programme dated February 2020 specifies that this infrastructure improvement is to be delivered in 2021/22. Detailed design work for this section of Cammo Walk has not begun at the time of writing and possible layouts or options will not be decided prior to this date; this is a transport improvement for the Council to deliver and is not the responsibility of the applicant."
- 5.25 West Craigs Ltd strongly disagrees with the position presented by the assessment in relation to active travel, which does not stand up to scrutiny. No evidence has been provided to support the conclusions reached. Rather, there has been a failure to account for committed and planned improvement works to the active travel network which are identified in the LDP Action Programme, being undertaken by the Council and others that will directly benefit the site.
- 5.26 In addition, the site would assist and enhance the design, delivery and the function of the Cammo Walk upgrade and deliver further cycle facilities and priority on Maybury Road by virtue of the main site access at Bughtlins Roundabout.
- 5.27 Overall, the lack of a robust assessment has resulted in inaccurate conclusions in relation to active travel.

#### **PUBLIC TRANSPORT**

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

- 5.28 We would again refer to the detailed Accessibility Review (Appendix 5) which details the site's accessibility by public transport.
- 5.29 The site is located within a 400m (short) walk of the existing bus stops on both Maybury Road and Maybury Drive, affording direct and convenient access to established frequent bus services such as the Lothian Buses No. 31 service. The 31 bus service is one of the best connected bus routes in the city, linking the site with the city centre including both Haymarket and Waverley Stations and then onwards into Midlothian.
- 5.30 The site also benefits from access to Edinburgh Gateway Station affording access to both the rail and tram network.
- 5.31 On this basis, contrary to the conclusion of the site assessment, it is evident the site supports travel by public transport through existing public transport network accessibility and capacity.

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

- 5.32 As above, the site is already supported by existing public transport provision. The identified diversion of the No. 31 bus service through the HSG 19 site (Turnhouse Road and Craigs Road) will further enhance direct access to the site by bus and increase opportunities for additional or alternative service buses in west Edinburgh as well as the connections to Edinburgh Gateway (Tram & Train).
- 5.33 The site may also deliver additional public transport benefits regarding route choice and frequency and access to Edinburgh Gateway via Cammo Walk and the Green Corridor.

#### Summary - Active Travel & Public Transport

- 5.34 The Councils assessment of the site in relation to active travel and public transport considerations raises significant concerns. The assessment fails to reflect the existing, the allocated, the committed and the forthcoming pedestrian, cycle and bus infrastructure and service improvements linked to the approved proposals for the HSG 19 and HSG 20 sites.
- 5.35 The assessment appears to ignore the Council's West Edinburgh Active Travel Network (WEATN) proposals, Quiet Routes, City Deal and planning obligations that will enhance and improve the active

and sustainable transport infrastructure in the area adjacent to and functionally linked to the 'Cammo Southern Parkland' site.

5.36 These significant omissions have informed an inaccurate and unjustifiably negative assessment of the 'Cammo Southern Parkland' site. This is extremely disappointing. The site supports both active travel and travel by public transport, it is therefore requested that the Council reconsiders their position on these matters.

#### COMMUNITY INFRASTRUCTURE

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

- 5.37 The assessment concludes that the site does not currently have sufficient primary school capacity. A recent report on 'School Roll Projections and Rising School Rolls' was presented to the Council's Education, Children and Families Committee on the 3<sup>rd</sup> March 2020 (Appendix 7). The School Roll Projections presented cover the period 2019-2029 and take account of planned LDP developments such as HSG19 and HSG 20. Reference to this report indicates that Corstorphine Primary School is currently operating under capacity but is projected to be over capacity by 2024. In terms of denominational schools, again Fox Covert RC Primary School currently operates under capacity and is projected to be over capacity by 2028
- 5.38 On this basis, and while there may not be sufficient primary school infrastructure capacity to accommodate the site's development without further intervention, the position is not as clear cut as the Site Assessment's conclusion would suggest.

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

- 5.39 The assessment concludes that the site does not currently have sufficient secondary school capacity. Again referring to the Council's School Roll Projections and Rising School Rolls' report (Appendix 7), it is noted that Craigmount High School currently operates under capacity and is not projected to exceed its 1400 capacity until 2027. In terms of St Augustines High School it is also under capacity at present, with projections indicating it is likely to be over capacity by 2023.
- 5.40 Again, while there may not be sufficient secondary school infrastructure capacity to accommodate the site's development without further intervention, the Site Assessment's conclusion appears to be unduly negative.

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

- 5.41 The assessment states that "the site does not have sufficient community infrastructure capacity to support development and no appropriate intervention has been required to address this". It suggests that both a new primary and new secondary school would be required and concludes that there is "not enough scope for development on this and nearby sites to support this level of intervention".
- 5.42 Within West Edinburgh significant education infrastructure interventions have been identified to support the potential greenfield sites highlighted by Choices for City Plan 2030. Specifically, a requirement for 3 new primary schools and 1 new secondary school is noted.
- 5.43 The consultation document recognises that "a requirement for additional school capacity in West Edinburgh has already been identified in the Council's current Action Programme". In this regard, as per the Committee Report provided at Appendix 7, CEC has confirmed they are progressing with a feasibility study which looks at extending Craigmount High School from its 1400 capacity to 1800 (as at March 2020), whilst full Council approval has been granted to construct the new Maybury Primary School within the HSG 19 site, which is being targeted to open in August 2022.
- The site is located within close proximity to both the new Maybury Primary and a potentially extended Craigmount High. It benefits from good active travel links which would allow pupils to access both campuses in a safe and sustainable manner. When compared with other identified sites within West Edinburgh (e.g. Norton Park) it is clear the site offers significant benefits in terms of safe routes to school, sustainable development patterns, etc.
- 5.45 If the Council is to deliver on either Option 2 or Option 3 and release additional greenfield land for housing over and above that identified by the consultation document, it is simply not appropriate to discount the site for reasons relating to a lack of community infrastructure capacity particularly when there are solutions and future capacity available at both primary and secondary schools. The site assessment has seemingly failed to account for interventions identified by the current LDP Action Programme and City Plan Choices 2030 document. It is noted that the Council's Option 1 takes a different approach to this issue, and does not refer to school capacities when considering sites for development.
- 5.46 Overall, while there may be insufficient non-denominational education capacity at present to accommodate the site's development, future capacity will be significantly increased by a series of planned interventions that are deliverable within the plan period. Contrary to the conclusion of the site assessment, education capacity is not a barrier to the site's release for development.

Rather, the site's allocation for housing within the emerging City Plan will allow it to be included within education capacity considerations and to contribute towards a planned sustainable solution to education infrastructure within West Edinburgh.

#### LANDSCAPE CHARACTER

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

- 5.47 The site assessment considers the site to be prominent in views from Cammo, Barnton and from the A8 and the A902 (Maybury Road). It notes that "considerable and visually intrusive ground modification" would be required whilst suggesting the site provides "an important undeveloped backdrop to the allocated developments at Maybury and Cammo". For these reasons it concludes that the site would not maintain the identity, character and landscape setting of the settlement.
- Before responding specifically to these points, it is relevant to reflect on the 2008 Edinburgh Green Belt Study. The study identifies the site as lying within the 'Cammo Fringe Farmland' Local Character Area, the associated Landscape Assessment (p 31) describes the Character Area as being "strongly influenced by housing and roads" and "of low intrinsic scenic quality". The study identifies the role of the landscape in the setting to the Cammo estate, in particular as the foreground to views from the A902 to the east however this situation has been superseded with the consenting of housing development at HSG 20 the open views to the estate from the east will be largely lost following development.
- 5.49 This submission has been informed by landscape and visual analysis. In terms of the site's prominence in views, we deal with these in turn.
- 5.50 To the north, visibility from the areas of Cammo, Cramond and Barnton are largely obscured by buildings. Upon completion the housing development at HSG 20 will screen and obscure views from the existing urban edge at Barnton/Cammo i.e. from Cammo Grove.
- 5.51 From the south, while the Craigs Road ridge is visible from the A8, development at the site would be both topographically screened and screened by woodland structure planting to the north of HSG 19. Views from the A8 would be unaffected by development at the site.
- 5.52 Significant impacts upon views from the east specifically from the A902/Maybury Road are not envisaged due to existing tree screening and the emerging presence of housing at site HSG20.

- Overall, the visual effects of housing development at the site would be well contained. Where the visual prominence of development is likely to be more significant, such effects will be experienced at short distances only (e.g. Craigs Road, southern section of the HSG20 site, recreational users within the Cammo Estate or using Cammo Walk). Through the use of appropriate measures such effects can be effectively mitigated. In this instance mitigation measure could include:
  - A woodland landscape buffer at the northern boundary of the site;
  - Appropriate treatments along Cammo Walk to create a green corridor and provide screening to the proposals;
  - The inclusion of a robust internal framework of trees to screen and break up views to housing in views from the north;
  - The inclusion of extra heavy standard, semi-mature and mature nursery stock to provide early landscape mitigation; and
  - The inclusion of advanced planting, as can be achieved, at the initial phases of the development to ensure the early establishment of mitigation planting.
- The approach adopted by CEC in relation to Taylor Wimpey's AMSC application on land south of Craigs Road (19/05051/AMC) provides useful comparison. Within their Committee Report (p12), CEC note that the site is "visually prominent in the surrounding area due to its topography which is undulating and slopes from north to south with views along the Almond valley out to the Pentland Hills" also that "the north of the site is particularly prominent where the site's ridgeline follows Craigs Road". In this case the CEC concluded that, through a variety of mitigation measures (e.g. woodland planting, screening) as evidenced by photomontages depicting the situation at years 1, 10 and 20, the development would "integrate sensitively with the surrounding landscape".
- 5.55 Development of the site well designed, informed by robust landscape and visual analysis, and containing appropriate mitigation measures could equally integrate sensitively with the surrounding landscape.
- 5.56 Turning to the suggestion that the site provides an "important undeveloped backdrop to the allocated developments at Maybury and Cammo", this is not accepted. The site will form a relatively minor part of the setting of consented housing development at HSG 20 which is defined to a greater extent by the Cammo Estate landscape features whilst topography and consented landscaping at HSC19 dictates that the role of the site as the setting to housing at HSG 19 will be very low.

5.57 Overall, it is considered that the Site Assessment's concern regarding the site's visual prominence and providing 'setting' to the HSG 19 and 20 sites is overstated. Existing topography, the structure of the existing landscape context, and emerging developments allied to the adoption of sensitive design approach and appropriate mitigation measures will ensure development of the site will maintain the identity, character and landscape setting of the settlement.

#### **GREEN NETWORK**

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?

- 5.58 The site assessment notes a failure to comply "due to the site lying adjacent to an area identified as a green network opportunity around Edinburgh Urban Area and is presently in use for recreation and managed as a country park".
- 5.59 As already noted, the site is not part of the green network and does not form part of the country park.
- 5.60 The conclusion acknowledges that the site lies 'adjacent' to an identified green network opportunity

   it does not form part of the identified green network. Development of the site would avoid any significant loss of landscape-scale land of existing or potential value for the strategic green network.
- 5.61 The 2008 Green Belt study concluded that the area makes limited contribution to the provision of accessible open space. It remains the case the site itself contributes poorly to green belt open space objectives there is no formal access across the fields of the site, access is typically restricted to field boundaries. The study did identify the potential for the landscape to provide more direct links to the accessible open space at Cammo from urban areas, rather than providing usable open space in its own right.
- 5.62 Rather than negatively impacting upon the value of the strategic green network the site's development would provide opportunities to create links from areas of housing (e.g. HSG19) to the large areas of usable green space at Cammo. Overall, the site's development offers opportunities for green network enhancements via the delivery of open space, local parks and enhanced linkages with the Cammo Estate. Such enhancements would be of significant value to the strategic green network rather than detriment.

#### FLOOD RISK

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

5.63 We agree with the Site Assessment's conclusion that the site's development would avoid identified areas of medium-high fluvial flood risk or areas of importance for flood management.

#### SUMMARY

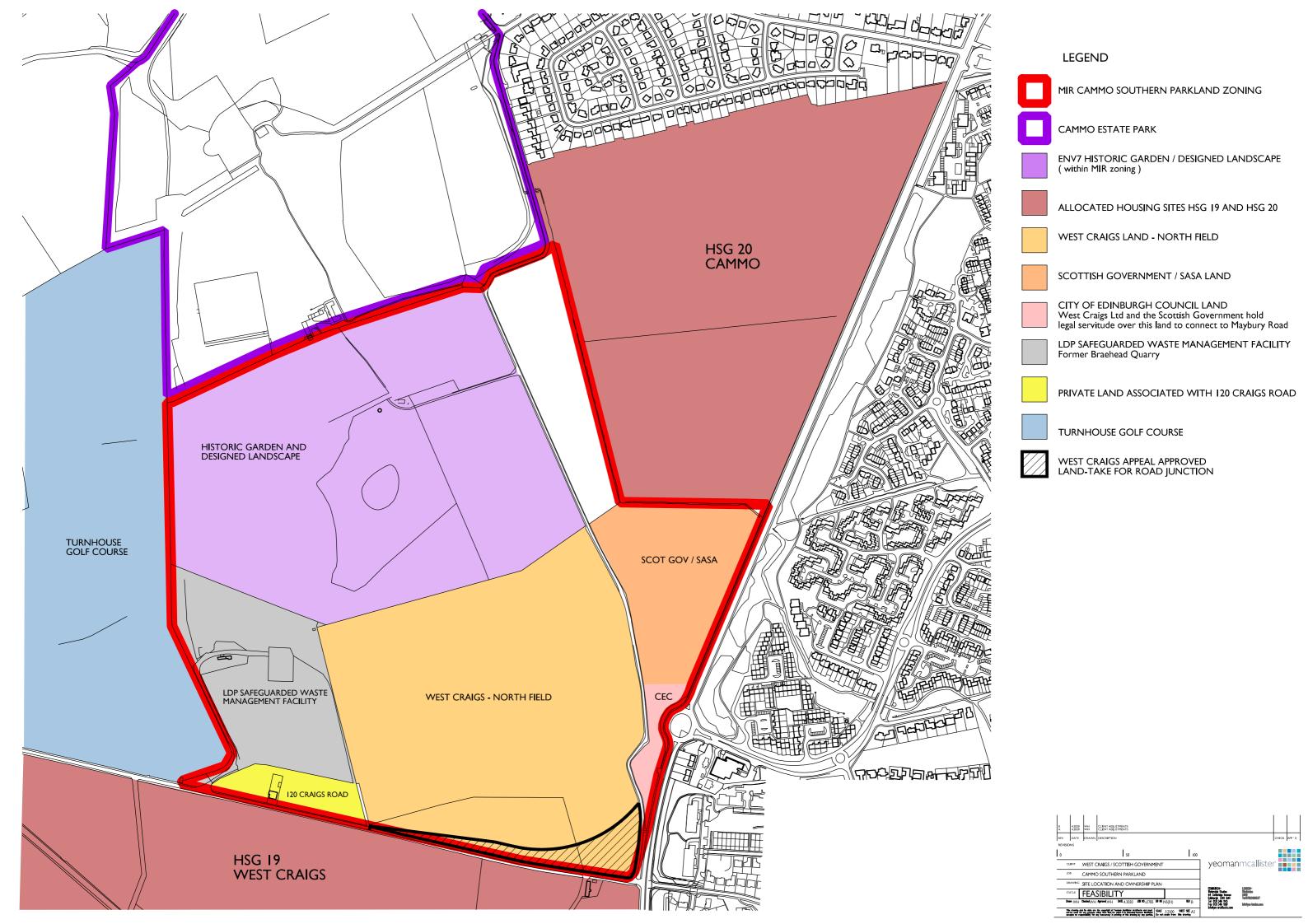
- The Site Assessment concludes that 'Cammo Southern Parkland' is not suitable for development due to its "poor community infrastructure capacity, poor public transport accessibility, prominent landscape character and contribution to the backdrop of existing housing allocations and strategic green network".
- 5.65 The Site Assessment considered a much wider area, and a number of its conclusions are clearly referring to land within the Cammo Estate. These conclusions are not relevant or applicable to the site.
- 5.66 There is a high degree of inconsistency in the Site Assessment in its conclusions between sites
- 5.67 This statement has critiqued the Site Assessment and demonstrated that in relation to a number of key criteria its conclusions are inaccurate and unjustified, or overstated. Of significant concern is the failure of the assessment to account for a range of active travel, public transport and community infrastructure interventions which relate directly to the site (all of which are identified by the current LDP Action Programme). The lack of proper analysis has resulted in an unjustifiably negative assessment of the site which does not stand up to scrutiny.
- 5.68 West Craigs Ltd has presented a clear and considered development proposal for their site, which includes appropriate mitigation measures where necessary. Overall, upon detailed consideration of all key assessment criteria, it can be reasonably concluded that this section of the 'Cammo Southern Parkland' area represents a suitable site for development and should be released from the green belt accordingly.

### 6. CONCLUSION

- Analysis of the Choices for City Plan 2030 document, and in particular its approach to meeting housing need and demand during the City Plan period, indicates that of the three options presented, Options 2 and 3 represent the most realistic options. West Craig's Limited would generally support the approach set out in the Council's Option 3, albeit this will not meet the Council's housing need and demand.
- 6.2 The priority given to brownfield as opposed to greenfield land as a means of making efficient use of existing infrastructure and service is recognised by West Craigs Ltd. Nevertheless, CEC's preferred approach of seeking to meet Edinburgh's housing need solely on brownfield land is unrealistic quite simply not enough land will be released for housing. The evidence clearly indicates that a number of additional greenfield sites must be identified and allocated for housing by City Plan 2030. In support of this it is appropriate to identify sites within Strategic Development Areas in the first instance
- 6.3 This submission has demonstrated that West Craigs Ltd's site represents an effective site capable of accommodating residential development in line with housing land policy objectives without prejudicing the purpose or integrity of the green belt at this location. The site is capable of delivering much needed housing development within the City Plan period.
- 6.4 West Craigs Ltd has presented a realistic and effective proposal which will allow the site's development to progress in a logical, sustainable and sensitive manner, consolidating the emerging settlement pattern and providing an improved, robust and defensible Green Belt boundary.
- 6.5 For the reasons presented by this submission, it is respectfully requested that the site be allocated for housing development within emerging City Plan 2030.

## **APPENDICES**

Appendix 1	Site Location and	Context Plan
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Appendix 2a	Deed of Servitude (CEC in favour of West Craigs Ltd)



## THE CITY OF EDINBURGH COUNCIL

in favour of

#### **WEST CRAIGS LIMITED**

#### **DEED OF SERVITUDE**

Property: Maybury Road, Edinburgh

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Live: 30750237 v 12

#### **DEED OF SERVITUDE**

by

THE CITY OF EDINBURGH COUNCIL, constituted under the Local Government etc. (Scotland) Act 1994 and having its administrative headquarters at Waverley Court, 4 East Market Street, Edinburgh, EH8 8GB (the "Burdened Owner")

in favour of

WEST CRAIGS LIMITED, incorporated under the Companies Acts (Registered Number SC226585) and having its Registered Office at Level 1, Citymark, 150 Fountainbridge, Edinburgh, EH3 9PE (the "Benefited Owner")

## 1 **DEFINITIONS AND INTERPRETATION**

#### 1.1 **Definitions**

In this Deed:

"Benefited Owner" means the proprietor from time to time of the Benefited Property;

"Benefited Property" means ALL and WHOLE that part of the subjects registered in the Land Register of Scotland under Title Number MID34648 as shown shaded pink on the title plan relative to Title Number MID34648;

"Burdened Owner" means the proprietor from time to time of the Burdened Property;

"Burdened Property" means ALL and WHOLE the area shown outlined and cross hatched in green on the Plan, being (1) ALL and WHOLE the subjects described in, disponed by and shown coloured pink on the plan annexed and executed as relative to Disposition by The Scottish Ministers in favour of The City of Edinburgh Council dated 30 March 2016 and to be registered in the Land Register and (2) part and portion of ALL and WHOLE the subjects described in and disponed by Disposition by The Board of Agriculture for Scotland in favour of The Lord Provost Magistrates and Council of the City of Edinburgh dated 24 July 1926and recorded in the Division of the General Register of Sasines for the County of Edinburgh on 29 July 1926;

"Plan" means the plan annexed and executed as relative hereto;

"Schedule" means the schedule annexed to this Deed of Servitude;

"Service Media" means all manner of pipes, conduits, channels, wires, cables, drains, sewers, connections, stays, conductors, ducts (including man-holes) for the supply and provision of Services;

"Services" means the supply of all services of whatever nature, including (without prejudice to the foregoing generality) water, gas, electricity, telephone and cable

"Servitude Conditions" means the conditions under which the Servitude Rights are to be exercised set out in Part 2 of the Schedule; and

"Servitude Right(s)" means the servitude rights set out in Part 1 of the Schedule.

#### 1.2 Interpretation

Save to the extent that the context or the express provisions of this Deed otherwise requires, in this Deed:

- 1.2.1 words importing any gender include all other genders;
- 1.2.2 words importing the singular number only include the plural number and *vice versa*;
- 1.2.3 where at any one time there are two or more persons included in the expression "Benefited Owner" or "Burdened Owner" obligations contained in this Deed which are expressed to be made by the party denoted by the expression in question are binding jointly and severally on them and their respective executors and representatives whomsoever without the necessity of discussing them in their order;
- 1.2.4 words importing individuals include legal persons and vice versa;
- 1.2.5 references to this Deed or to any other document are to be construed as reference to this Deed or to that other document as modified, amended, varied, supplemented, assigned, novated or replaced from time to time;
- any reference to a Clause, Schedule or Part of the Schedule is to the relevant Clause, Schedule or Part of the Schedule of or to this Deed;
- 1.2.7 any phrase introduced by the words "including", "include", "in particular" or any similar expression is to be construed as illustrative only and is not to be construed as limiting the generality of any preceding words; and
- 1.2.8 any rights reserved to the Benefited Owner are exercisable by the tenants, agents, employees, workmen and others authorised by them from time to time.

#### 1.3 Headings

The headings in this Deed are included for convenience only and are to be ignored in construing this Deed.

#### 1.4 Schedule

The Schedule forms part of this Deed.

#### 2 GRANT OF SERVITUDE

The Burdened Owner grants the Servitude Rights but subject always to the Servitude Conditions.

The Burdened Owner (and its successors in title to the Burdened Property and each and every part thereof) acknowledges and accepts that the Servitude Rights shall be for the benefit of the Benefited Property (and every part thereof) notwithstanding any sub-division thereof or any intensification or change of the use thereof.

## 3 DATE OF COMMENCEMENT OF SERVITUDE

The Servitude Rights granted by this Deed will be exercisable with effect from 3 March 2016.

### 4 WARRANDICE

The Burdened Owner grants warrandice.

### 5 STATUTORY POWERS

Nothing herein contained or implied or done hereunder (including without prejudice to the generality any consent or approval granted by The City of Edinburgh Council as proprietor of the Burdened Property) shall prejudice or affect the powers, rights, duties and obligations of The City of Edinburgh Council as local authority, planning authority, building authority or roads authority under or by virtue of any public or local act, order, statutory instrument, regulation or bye-law or relieve the Benefited Owner from the necessity of obtaining from The City of Edinburgh Council or their statutory successors as local authority, planning authority, building authority or roads authority all such approvals or consents in respect of plans or otherwise as may be requisite under or by virtue of any such act, order, statutory instrument or bye-law.

### 6 NO LANDS TRIBUNAL APPLICATIONS

No application may be made to the Lands Tribunal for Scotland under section 90(1)(a)(i) of the Title Conditions (Scotland) Act 2003 in respect of the servitudes set out in this Deed for a period of five years after the registration of this Deed in the Land Register of Scotland. IN WITNESS WHEREOF these present consisting of this and the three proceeding pages together with the Schedule and Plan 1 and Plan 2 are executed as follows:-

the said THE CITY OF EDINBURGH COUNCIL at EDZNBURGH on 26 APRIL 2016	
Print Full Name before this witness  AMSDAR SIM Print Full Name	Authorised Signatory  Claude Witness
Address GOSAR TRAM DEPOT 1 MYRETON DRUE EDINBURS 14 EH12. 95E	
SUBSCRIBED for and on behalf of the said WEST CRAIGS LIMITED at GLASGOW on 6 JUNE 2016	
Print Full Name before this witness  Pan Muerruck  Print Full Name	Director/ Secretary/ Authorised Signatory  Mey Cafalla Witness
Address 10 GANK & SURANO 110 ST VINNOR SMEET WASHAN WASHA	

This is the Schedule referred to in the foregoing Deed of Servitude by The City of Edinburgh Council in favour of West Craigs Limited

#### **SCHEDULE**

#### PART 1

- A non-exclusive servitude right of access and egress at all times and for all necessary purposes for pedestrians and vehicles (including heavy vehicles) over and across the Burdened Property;
- A non-exclusive servitude right to construct and install and thereafter use, maintain and repair and when necessary renew, rebuild, alter and replace roads and footpaths with associated footpaths, verges and street lighting within the Burdened Property to connect the Burdened Property with any roads and footpaths constructed or to be constructed within the Benefited Property;
- A non-exclusive servitude right to take access onto and across the Burdened Property as necessary for the purposes specified in paragraph 2 of this Part 1 of this Schedule above;
- A non-exclusive servitude right to connect into and thereafter use, inspect, repair, maintain and where necessary renew and replace any Service Media in, on, through or under the Burdened Property;
- A non-exclusive servitude right to lay, install and retain in situ and thereafter use inspect, repair, maintain and where necessary renew and replace any Service Media in, on, through or under the Burdened Property; and
- A non-exclusive servitude right of access onto the Burdened Property as necessary for any of the purposes specified in paragraphs 4 and 5 of this Part 1 of this Schedule above, subject to giving to the owner for the time being of the Burdened Property at least seven days' written notice (except in an emergency).

5

## PART 2 THE SERVITUDE CONDITIONS

The Servitude Rights created by this Deed are subject to the following Servitude Conditions:

- 1 The Benefited Owner will:
- 1.1 provide the Burdened Owner with specifications showing the design and layout of any roads and footpaths with associated footpaths, verges, street lighting to be constructed on the Burdened Property as contemplated in paragraph 2 of Part 1 of this Schedule no later than 3 months prior to such works commencing;
- obtain all relevant statutory consents before carrying out any of the works on the Burdened Property as contemplated in paragraph 2 of Part 1 of this Schedule;
- 1.3 make good on demand all damage caused to the Burdened Property by reason of the exercise of the Servitude Rights by the Benefited Owner or its tenants, agents, employees, workmen and others authorised by it from time to time, to the reasonable satisfaction of the Burdened Owner;
- 1.4 procure that the Servitude Rights are exercised so as to cause as little disturbance, nuisance or annoyance as is reasonably practicable to the Burdened Owner and its tenants or occupiers, and all other adjoining or neighbouring proprietors, tenants or occupiers.
- Subject to paragraph 3 of this Part 2 of the Schedule below, the Benefited Owner will at all times maintain any roads, footpaths, street-lighting and Service Media constructed or installed on the Burdened Property by the Benefited Owner pursuant to the Servitude Rights in good repair and condition, subject to any third party or parties exercising rights over such roads and footpaths being responsible for an equitable share according to user of the costs of maintenance, repair and renewal of such roads and footpaths until the same are taken over for maintenance by the Local Authority.
- When and to the extent that any roads, footpaths, verges, street-lighting or Service Media is/are adopted by any local or other authority for maintenance purposes, the liability of the Benefited Owner and/or any third party to maintain same in terms of paragraph 2 of this Part 2 of the Schedule above shall cease.
- There is reserved to the Burdened Owner the right (at any time prior to the Benefited Owner exercising its right under paragraph 2 of Part 1 of this Schedule) to construct on the Burdened Property roads and footpaths (with associated verges, streetlighting and Service Media) to provide access to and egress from the Benefited Property for pedestrian and vehicular traffic for all purposes to and from Maybury

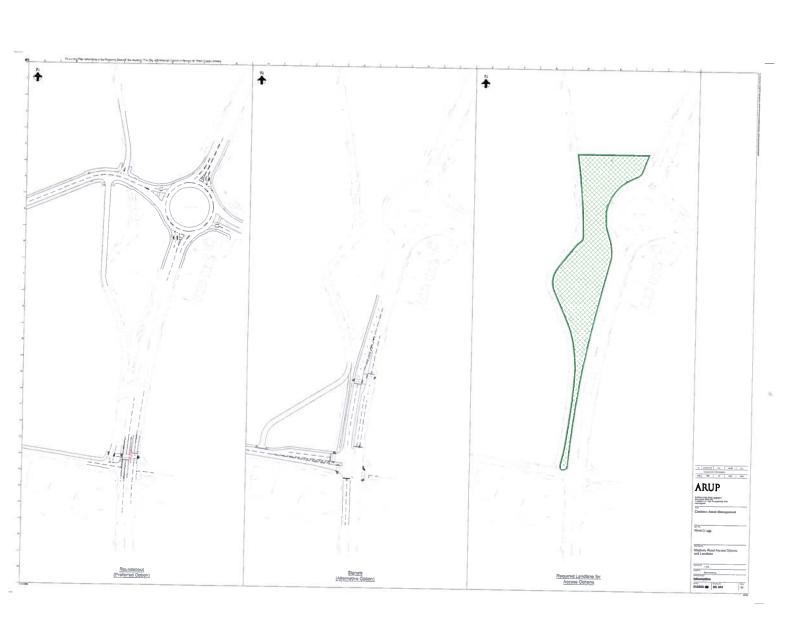
Road, provided that if the Burdened Owner exercises the right as provided for in this paragraph 4, then the following conditions shall apply:

- 4.1 The Burdened Owner shall ensure that such roads, footpaths, verges, street-lighting and Service Media are designed and constructed of good quality materials and in a good and workmanlike manner.
- 4.2 The Burdened Owner shall (subject to complying with all relevant statutory requirements):
  - 4.2.1 ensure that such roads, footpaths, verges and street-lighting are designed and constructed to a specification that provides access to and egress from the Benefited Property for the capacity and volume of traffic that (i) is sufficient for the capacity and volume of traffic reasonably anticipated as being likely to use such roads and footpaths (assuming for this purpose that the Benefited Property has been fully developed to the 2000 home density as per the Local Development Plan allocation HSG 19) and (ii) is not of less capacity than would be provided for by the implementation of one of the options (or a combination of both options) for roads, footpaths, verges and street-lighting shown on Plan 2 (for the avoidance of doubt being (a) an enhanced junction at Maybury Road and Craigs Road, with all necessary splays to allow deceleration and turning and/or (b) a fourth arm at the western section of the Bughtlins roundabout connecting to Craigs Road); and
  - 4.2.2 use reasonable endeavours to procure that such roads, footpaths, verges and street-lighting are adopted by the local authority for maintenance purposes as soon as reasonably practicable after completion of same; and
  - 4.2.3 ensure that any such Service Media is installed to the boundary of the Benefited Property to allow connections to be made from the Benefited Property.
- 4.3 The Burdened Owner shall give the Benefited Owner prior written notice before commencing construction of such roads, footpaths, verges, street-lighting and Service Media and once commenced, shall use reasonable endeavours to procure that the construction of the roads, footpaths, verges, street-lighting and Service Media is completed in accordance with the provisions of this paragraph 4 as soon as reasonably practicable.

} WCZ

And Poss

This is the plan referred to in the foregoing Deed of Servitude by The City of Edinburgh Council in favour of West Craigs Limited



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Appendix 2b	Report to CEC Finance and Resources Committee 19.3.15

# **Finance and Resources Committee**

#### 10.00 a.m, Thursday, 19 March 2015

# Land adjacent to Maybury Road - Proposed Acquisition

Item number 8.6

Report number

**Executive/routine** Executive

Wards 1- Almond

2- Drum Brae/Gyle

#### **Executive summary**

The Rural West Edinburgh Local Plan (RWELP), and Second Proposed Local development Plan (LDP), promote the provision of major transport infrastructure and the release of land for residential development.

There is risk associated with the availability of land for road, and service infrastructure for residential development, and the achievement of the optimal design for the Edinburgh Gateway Station (EGS).

To facilitate the resolution of these land issues, and ensure the successful delivery of key components of the LDP, an agreement between Scottish Government, Network Rail, West Craigs Ltd and the Council has been negotiated.

This report seeks approval for the acquisition of an area of land from the Scottish Ministers, the granting of a servitude right of access over the land to West Craigs Ltd and entering into an agreement with Network Rail to indemnify the Council for all costs associated with the land transactions.

#### Links

Coalition pledges P15, P17

Council outcomes CO7, CO8, CO22

Single Outcome Agreement SO1, SO2

# Report

# Land adjacent to Maybury Road - Proposed Acquisition

#### Recommendations

It is recommended that Committee:-

- 1.1 Approves the acquisition of 0.76Ha or thereby of land from Scottish Ministers at Maybury Road;
- 1.2 Approves the grant of a servitude right of access over the land to West Craigs Ltd;
- 1.3 Approves an agreement with Network Rail to indemnify the Council for all costs associated with these transactions; and
- 1.4 Authorises completion of these transactions, in accordance with the terms outlined in this report, and on such other terms and conditions to be agreed by the Acting Director of Services for Communities and Head of Legal, Risk and Compliance.

#### **Background**

- 2.1 The Second Proposed Local Development Plan (LDP) provides for the delivery of major transport infrastructure, and the release of significant areas of land for residential development.
- 2.2 The success of the LDP will be dependent on the delivery of this infrastructure, in particular, the provision of adequate road and rail links.
- 2.3 An area of land at Maybury Road, extending to 0.76Ha or thereby, shown hatched red on the attached plan, is in the ownership of the Scottish Ministers, and its acquisition by the Council would safeguard the land for the provision of infrastructure required for the development proposals set out in the draft LDP.
- 2.4 The acquisition by Network Rail, of a second area, shown outlined blue on the attached plan, would enable the optimal design solution for the construction of the Edinburgh Gateway Station (EGS). This area is owned by West Craigs Ltd.
- 2.5 Delivery of EGS is included in the LDP Action Programme (June 2014), and is being developed by Network Rail in partnership with Transport Scotland and the Council. EGS is part of a national project in the National Planning Framework, with planning permission granted by full Council at its meeting on 28 June 2010 (CEC Ref: 09/02589/FUL.

#### **Main report**

- 3.1 The Scottish Ministers have indicated they will sell land adjacent to Maybury Road to the Council, to assist the delivery of the LDP actions contained in its Action programme. West Craigs Ltd has also indicated that it will release land required for the EGS to Network Rail.
- 3.2 Once the Council has acquired the Maybury Road land, and West Craigs Ltd has released its site for the EGS, a servitude right of access will be granted to West Craigs Ltd, enabling improved road provision associated with future residential development.
- 3.3 The LDP Action Programme does not have a budget for these transactions, however, Network Rail requires comfort that all the areas of land required for the EGS are acquired timeously and, accordingly, has agreed to indemnify the whole of the Council's costs incurred in their completion.
- 3.4 Discussions have taken place with Scottish Government, Network Rail and West Craigs Ltd and provisional agreement has been reached for the acquisition, servitude and funding indemnity on the following main terms and conditions:

•	Purchase	The Council will acquire land extending to 0.76Ha
		or thereby adjacent to Maybury Road. In
		accordance with Scottish Government protocols, a
		valuer will be appointed to act jointly on behalf of
		Scottish Ministers and the Council to determine the
		acquisition land value.

- Servitude The Council will grant a servitude right of access to West Craigs Ltd, across the Maybury Road land, subject to the release of land required for the EGS to Network Rail.
- Funding Indemnity Network Rail will indemnify the Council for the whole costs associated with these transactions.
- 3.5 These transactions will facilitate the resolution of the land issues at Edinburgh Gateway Station, and enable the delivery of transport infrastructure in support of development proposals in West Edinburgh.

#### Measures of success

4.1 Land required for road and service infrastructure development for the LDP will be secured.

#### **Financial impact**

5.1 The Councils whole costs will be indemnified by Network Rail.

#### Risk, policy, compliance and governance impact

6.1 If this land is not secured the development of proposals promoted by the LDP will have increased risk. In particular, the completion of the EGS may be delayed, which would have a negative impact on potential tram patronage at the interchange tram stop with the railway station.

#### **Equalities impact**

7.1 An Equalities and Rights Impact Assessment has been carried out. The proposed transactions will have a positive impact on transport in Edinburgh improving connectivity, with green, healthy and accessible infrastructure.

#### Sustainability impact

8.1 The creation of modern transport infrastructure will minimise impact to the environment.

#### **Consultation and engagement**

9.1 Scottish Ministers, Transport Scotland, Network Rail and West Craigs Ltd have been party to the discussions on the proposals.

#### **Background reading/external references**

N/A

#### John Bury

#### Acting Director of Services for Communities

Contact: Steve Sladdin, Estates Manager

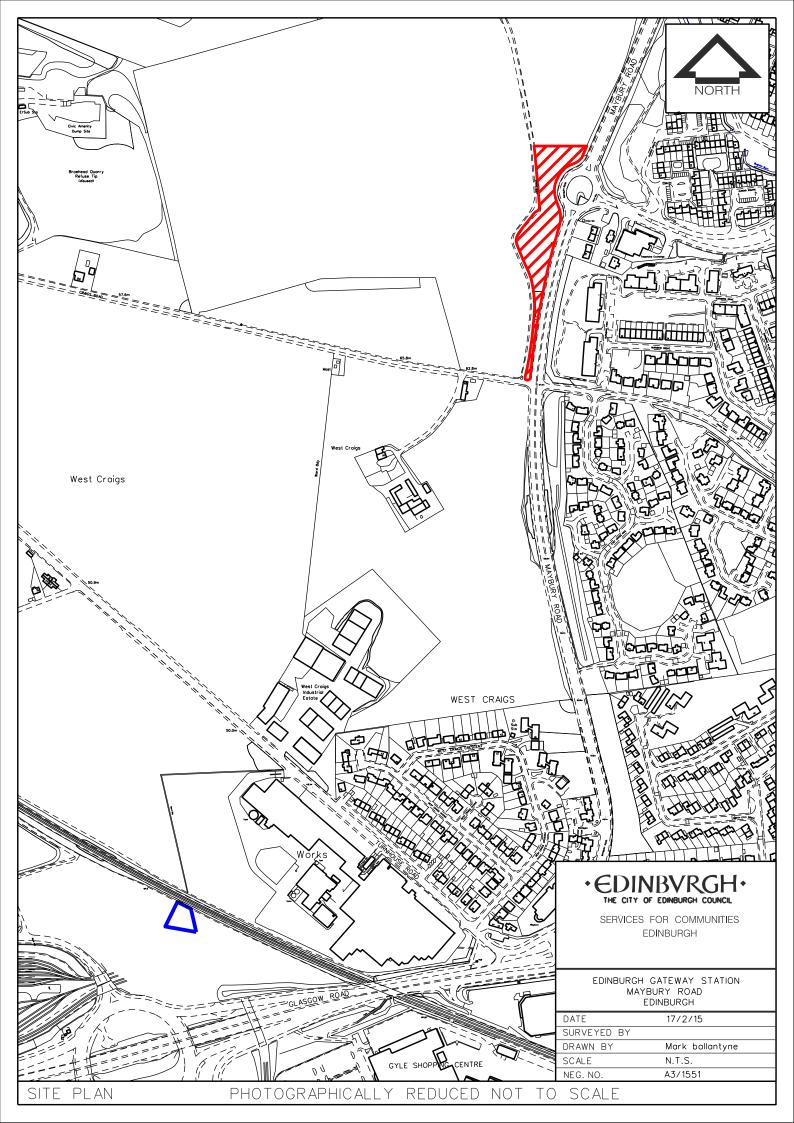
E-mail: stephen.sladdin@edinburgh.gov.uk | Tel: 0131 529 5982

#### Links

Coalition pledges P15 – Work with public organisations, the private sector and social enterprise to promote Edinburgh to investors.

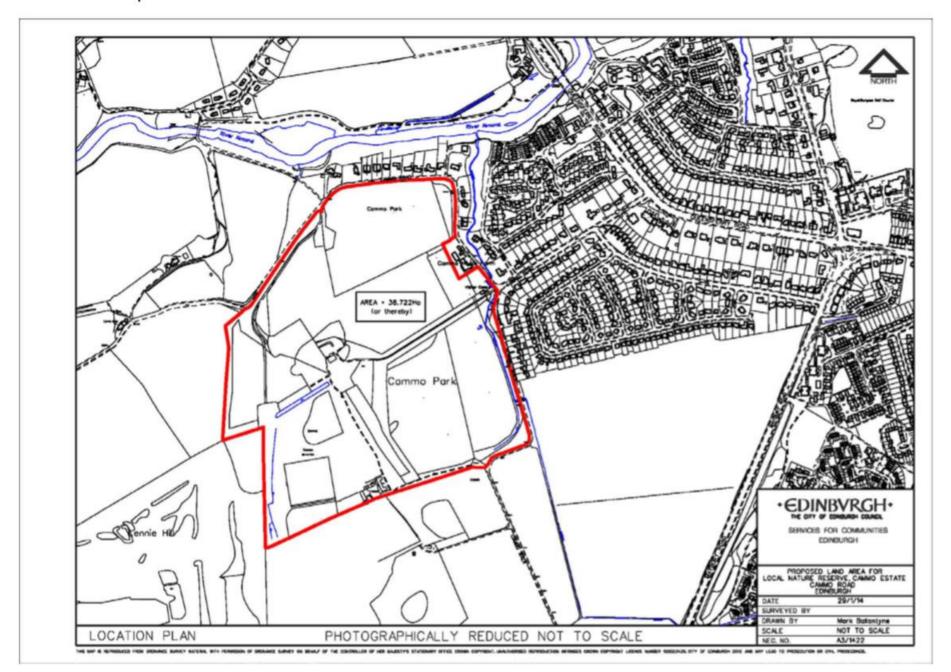
P17 – Continue efforts to develop the city's gap sites and

	encourage regeneration.
Council outcomes	CO7 – Edinburgh draws new investment in development and regeneration.
	CO8 – Edinburgh's economy creates and sustains job opportunities.
	CO22 – Moving efficiently – Edinburgh has a transport system that improves connectivity and is green, healthy and accessible.
Single Outcome Agreement	SO1 – Edinburgh's Economy Delivers increased investment, jobs and opportunities for all.
	SO2 – Edinburgh's citizens experience improved health and wellbeing, with reduced inequalities in health.
Appendices	Location Plan.



Appendix 3a	Cammo Local Nature Reserve Boundary

#### Cammo Estate area map



Appendix 3b	Cammo Garden & Designed Landscape Boundary

#### Cammo

Designation Reference: GDL00081

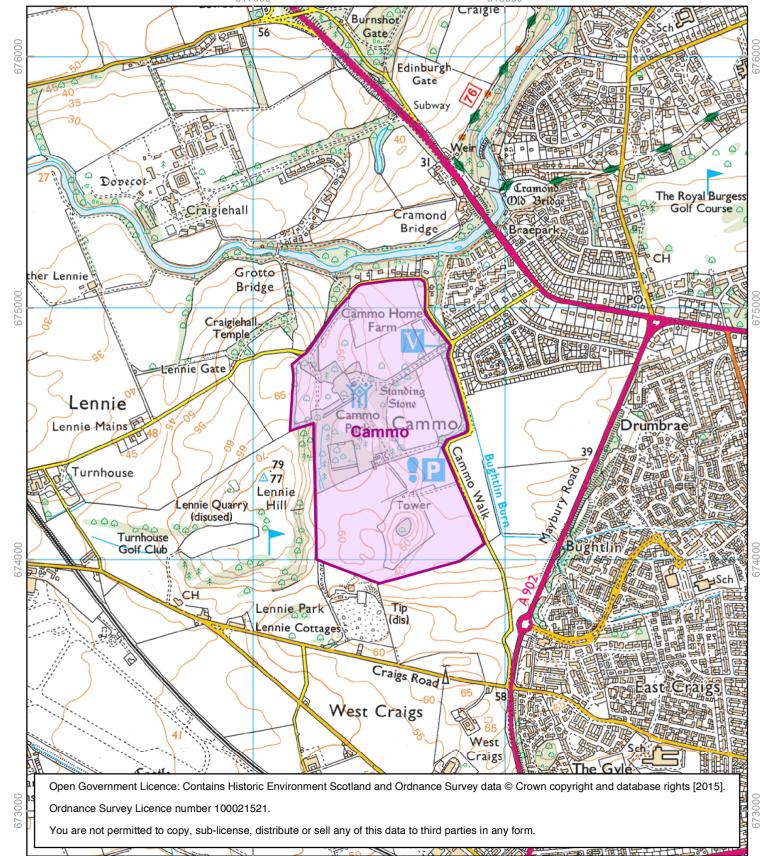
Date of Inclusion: 31/03/2001

Council: Edinburgh
Map Scale: 1:15,000



Garden and Designed Landscape Boundary





Appendix 4a	Extract from HSG20 Cammo S.75 Agreement (18/01755/FUL)

#### MINUTE OF AGREEMENT

among

THE CITY OF EDINBURGH COUNCIL

and

AMANDA PONSONBY and OTHERS

and

CALA MANAGEMENT LIMITED & BDW TRADING LIMITED

Subjects: Land 345 metres southeast of Cammo Walk, Edinburgh 2019





THIS IS THE SCHEDULE OF PAYMENTS COMPRISING PART 3 OF THE SCHEDULE REFERRED TO IN THE FOREGOING MINUTE OF AGREEMENT AMONG (A) THE CITY OF EDINBURGH COUNCIL (B) AMANDA PONSONBY, ALISTAIR JOHN CECIL COLVIN, HUGH ALAN HARVEY, ARABELLA NICHOLA GAGGERO, AND THE TRUSTEES OF THE LATE NICHOLA COLVIN AND (C) CALA MANAGEMENT LIMITED AND BDW TRADING LIMITED IN RESPECT OF LAND 345 METRES SOUTHEAST OF CAMMO WALK, EDINBURGH

HSG20 - CAMMO, EDINBURGH PLANNING GAIN / SECTION 75 SUMMARY & PAYMENT PROFILE

32

ltem	Total CEC S75 Sum	Prior to Commencement Date	Prior to 1st Residential Unit reaching Relevant Milestone	Prior to 100 <sup>th</sup> Residential Unit reaching Relevant Milestone	Prior to 200 <sup>th</sup> Residential Unit reaching Relevant Milestone	Prior to 300th Residential Unit reaching Relevant Milestone	Prior to 400th Residential Unit reaching Relevant Milestone	Prior to 500 <sup>th</sup> Residential Unit reaching Relevant Wilestone	INDEXED Y/N
Education Land Flat (2 + Bed)	£163,744			£32 748 80	£32 748 80	08 872 023	20074000		
Education Land House	£547,256			£109,451,20	£109,451,20	£109 451 20	£32, /48.80	£32,748.80	z
Education - Infra Flat	£1,106,304	£23,392.00	£180,485,33	£180 485 33	£180 485 33	£180 485 33	2109,451.20	£109,451.20	z
Education - Infra House	£4,337,848	£426,608.00	£651,873,33	£651.873.33	£651 873 33	£651 873 33	£180,485.33	£180,485.33	<
EDUCATION - TOTAL	£6,155,152	£450,000.00	£832,358.67	£974,558.67	£974,558.67	£974,558.67	£974,558.67	£974,558.67	<b>*</b>
Transport - Cammo/Maybury Cycle Path Transport - Cammo Walk Link (North)	£367,500				£183,750.00	£183,750.00			~
Transport - Bughtlin Burn Bridge	£560,000				£280 000 00	00 000 0863			<
Transport - East Craigs Shared Use Paths Transport - Maybury Road/East Craigs Crossing	£305,000				£152,500.00	£152,500.00			~ ~
Transport - Bus Infrastructure Upgrade	£490,000	,	£122,500.00	£122,500,00	£122 500 00	£122 500 00			<
Transport - Strategic Junction Improvements	£1,171,117		£1,171,117.00			6166,000.00			< ~
Transport - Transport Orders	£8,450	£8,450.00							. ~
Fransport - Car Club	£34,500	£34,500.00							2 2
TRANSPORT - TOTAL	£2,936,567	£42,950.00	£1,293,617.00	£122,500.00	£738,750.00	£738,750.00	£0.00	£0.00	Z
Healthcare - Contribution to Parkgrove Medical Centre	£68,775	£68,775.00							
HEALTHCARE - TOTAL	£68,775	£68,775.00							z
PI ANNING GAIN TOTAL	50 460 404	000							A
PANNING GAIN I CIAL	29,160,494	2567,725	£2,125,976	£1,097,059	£1,713,309	£1,713,309	£974,559	£974,559	1
CUMULATIVE BALANCE		£561,725.00	£2,687,700.67	£3,784,759.33	£5,498,068.00	£7,211,376.67	£8,185,935.33	£9,160,494.00	
		£561 725 00	£2,495,350.67	£1 ARR 423 67					

18 7 2019 Toll 2



#### MINUTE OF AGREEMENT

between

THE CITY OF EDINBURGH COUNCIL

and

DOCTOR GORDON MALCOLM WYLLIE, IAN JAMES FERGUSSON, ROBERT GORDON HOGG and FIONA GILLESPIE as TRUSTEES OF THE GAY RAMSAY-STEEL-MAITLAND OR STAFFORD TRUST AND TAYLOR WIMPEY UK LIMITED

and with the consent of

TAYLOR WIMPEY UK LIMITED

Subjects: Land at Craigs Road, Edinburgh

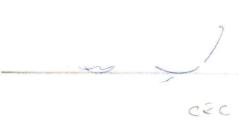
2019

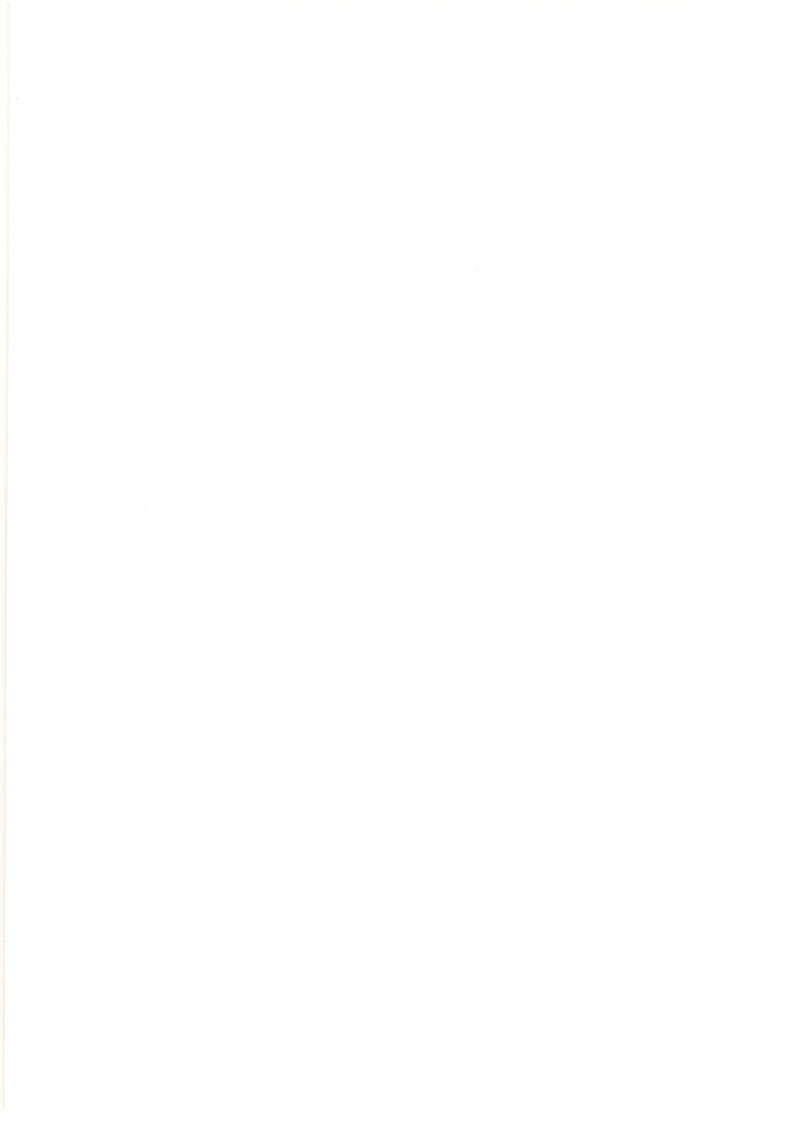




Schedule Part 3 Schedule of Payments

				Payment 1	Payment 2	Payment 3	Payment 4	Payment 5	
ltem	No. of Plots	Per Unit (except Rail Crossing)	Total Sum	Prior to Total Sum. Commencement Date	Prior to 50th Residential Unit reaching Relevant	Prior to 100 <sup>th</sup> Residential Unit reaching Relevant	Prior to 150 <sup>th</sup> Residential Unit reaching Relevant	Prio Reside	Total
Education - Land Flat	99	£476	£26,656		all carried	Miestone	Milestone	Milestone	
Education - Land House	194	£2,042	£396,148						
Education - Infra Flat	56	£3,216	£180,096			AND THE PROPERTY OF THE PROPER			
Education – Infra House	194	£16,186	£3,140,084						
Education - Totals			£3,742,984	£93,576	£912,352	£912,352	£912.352	5912 352	£3 742 984
Maybury/Craigs/Barnton Transport	250	£1,952	£487,973	£12,199	£237,887		£237,887	and the same of th	£487 973
Cyclepaths			£81,725	£2,043	£39,841		£39 841	manufacture de la company de l	£81 725
Shared Cycleway Turnhouse Road	250	£352	£87,988	£2,200	£42,894		£42.894		F87 988
Maybury Junction Pedestrian/Cycleway	250	£86	£21,578	E540	£10,519		£10,519		£21 578
Transport Orders			£8,000	£8,000					68 000
Car Club			£18,000	£18,000				THE REAL PROPERTY AND ADDRESS OF THE PROPERTY	£18 000
Maybury Road Crossing			£50,000		£50,000				£50 000
Tram	250	6749	£187,285	£93,642			£93.642		£187 284
Rail Crossing	17.02%	E600,000	£102,114				£102,114		£102 114
Total			£4,787,646	£230,200	£1,293,493	£912,352	£1.439.249	£912.352	64 787 646





Appendix 4c	Extract from HSG19 West Craigs Unilateral Obligation (PPP-230-2207)

# UNILATERAL OBLIGATIONS UNDER SECTION 75 OF THE TOWN AND COUNTRY PLANNING (SCOTLAND) ACT 1997

by

# WEST CRAIGS LIMITED

Subjects: Site 100 metres north east of 19 Turnhouse Road, Edinburgh

Ref: CW18 Burges Salmon LLP www.burges-salmon.com Tel: +44 (0)131 314 2128 Fax: +44 (0)117 902 4400





Affordable Housing Units and to enter into any other Affordable Housing Contracts;

#### **Transport Contribution**

means the sum of ONE THOUSAND FIVE HUNDRED AND SEVENTY EIGHT POUNDS (£1,578) STERLING Indexed per Residential Unit towards the design and delivery of such transport infrastructure improvements that are identified as actions in the Council's Action Programme within the Maybury/Barnton Transport Contribution Zone;

#### TRO Contribution

means the sum of TWO THOUSAND POUNDS (£2,000) STERLING Indexed towards the promotion of a Traffic Regulation Order for the purpose of any of the following as required as a result of the Development: (i) introducing loading and waiting restrictions, (ii) the re-determination of a road, (iii) the installation of a traffic management system, and (iv) speed reduction or stopping up orders.

#### W-1 West Education Contribution Zone

means the W-I Sub Area of the West Edinburgh Contribution Zone shown within the maps annexed to the current adopted version of the City of Edinburgh Council's Supplementary Planning Guidance on Development Contributions and Infrastructure Delivery, or equivalent guidance, in force as at the date that any contribution (or part of a contribution) is received in terms of this Instrument.

#### **Working Day**

means all days of the week excluding:

- (i) Saturday & Sunday; and
- (ii) all statutory holidays in Scotland; and
- (iii) all national public holidays in Scotland; and
- (iv) all Edinburgh local public holidays.

#### 2 STATUTORY AUTHORITIES

- 2.1 If any provision of this Instrument is held to be invalid or illegal or unenforceable the validity, legality and enforceability of the remaining provisions shall not in any way be deemed thereby to be affected or impaired.
- 2.2 The obligations in Clause 3 are entered into unilaterally under section 75 of the 1997 Act and are planning obligations for the purposes of the 1997 Act and the Proprietor acknowledges that



#### Appendix 5 Accessibility Review (ARUP, April 2020)

# West Craigs Ltd North of Craigs Road, Edinburgh Accessibility Review

Final | 24 April 2020

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 254681-00

Ove Arup & Partners Ltd

13 Fitzroy Street London W1T 4BQ United Kingdom www.arup.com



# **Document verification**



Job title		North of Cr	aigs Road, Edinburgh	1	Job number
					254681-00
Document t	title	Accessibilit	y Review		File reference
Document 1	ref				
Revision	Date	Filename	Reportel Draft 1 No	orth Field Site Acce	ssibility Review.docx
Draft 1	22 Apr 2020	Description	First draft		
			Prepared by	Checked by	Approved by
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#### 1 Introduction

Ove Arup & Partners Ltd (Arup) has been commissioned by West Craigs Ltd (WCL) to review the accessibility of the land to the north of Craigs Road and west of Maybury Road, located between the adopted Local Development Plan (LDP) allocation HSG 19 (Maybury) to the south and HSG 20 (Cammo) to the north. The land forms part of the "Cammo Southern Parkland" in the Council's City Plan 2030 Housing Study. The land is referenced within this assessment as 'the site' and indicated by Graphic 1.1.

Figure 13 West Edinburgh Overview Map

Cammo

The Site

Royal Highland Centre

International Business Gatemay

Bas Cospandium

Indinatoris Bank
Country Overview Map

The Site

**Graphic 1.1** Extract of LDP Figure 13 – West Edinburgh Overview Map

This review considers the accessibility of the site by active and sustainable forms of travel in accordance with the movement hierarchy identified and supported by national and local guidance, including the Society for Chief Officers of Transport in Scotland (SCOTS).

This review identifies that the site is accessible by the existing and proposed active and sustainable forms of travel and will support sustainable development in accordance with the LDP Policy Tra 1.

The cumulative and site-specific transportation opportunities and requirements for any development proposals within the site will be identified at the appropriate time through a separate formal Transport Assessment in accordance with current guidance, the LDP Policy Del 1 and the associated transportation policies such as Tra 1, Tra 2, Tra 3 and Tra 8.

The remainder of the report summarises the accessibility of the site to the existing and forthcoming pedestrian, cycle and public transport facilities and services.

### **2** Principles of Access

#### 2.1 Allocated/Committed Transport Interventions

The Council's 2016 West Edinburgh Transport Appraisal Refresh report (WETA Refresh) provides the cumulative transport assessment that supports the allocated development within west Edinburgh, including the allocated residential HSG 19 and HSG 20 sites to the west of Maybury Road.

The LDP and the associated Action Programme identify the key transport interventions to support the HSG 19 and HSG 20 allocations, contained within the Maybury and Cammo Site Brief. Graphic 2.1 is an extract from the Maybury and Cammo Site Brief indicating the site within the context of the committed transportation interventions and the allocated HSG 19 and HSG 20 sites.

Maybury and Cammo Site Brief

she boundary

trans line

bus route

bus route

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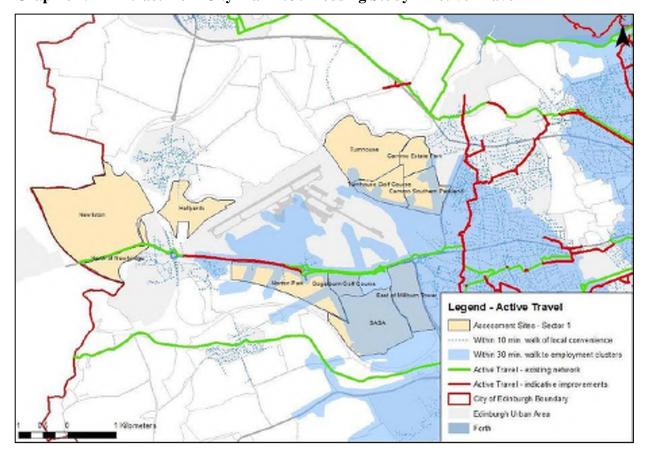
**Graphic 2.1** Extract from the LDP Maybury and Cammo Site Brief

Graphic 2.1 indicates that the site is functionally linked with, adjacent to and bisected by the various multi-modal transportation interventions attributed to the allocated HSG 19 and HSG 20 sites. Graphic 2.1 indicates the site abuts Craigs Road to the south and Maybury Road to the east and is bisected by Cammo Walk, which offer direct access to the local and strategic road networks.

Since the adoption of the LDP, the majority of the allocated HSG 19 site and all the HSG 20 site have obtained planning approval with associated planning obligations to deliver the key transport interventions identified by the LDP (represented by Graphic 2.1) and the Council's Action Programme.

#### 2.2 Additional Access Routes

Graphic 2.2 is an extract from the Council's City Plan 2030 Housing Study dated January 2020. This presents what the Council believes to be the active travel facilities and routes in west Edinburgh.

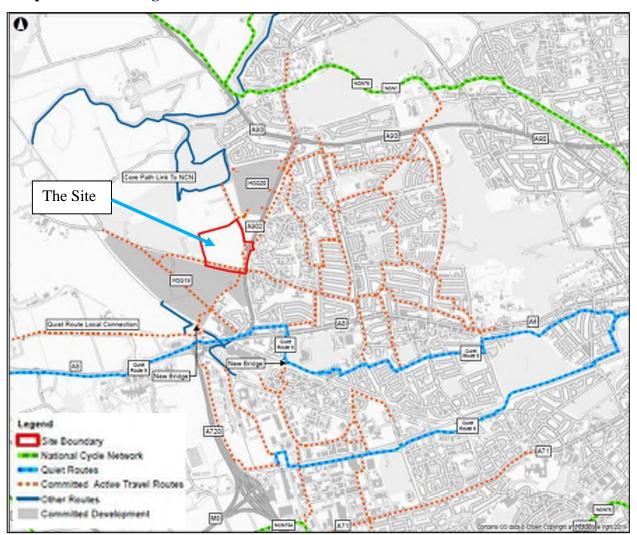


**Graphic 2.2** Extract from City Plan 2030 Housing Study – Active Travel

The Council's summary identified by Graphic 2.2 does not however, allow for the full extent of the current, the committed or the proposed active travel facilities and routes indicated by the LDP in Graphic 2.1 or by Graphic 2.3, which include the key committed facilities identified by the LDP allocations HSG 19 Maybury and HSG 20 Cammo such as:

- The internal pedestrian and cycle routes within the committed HSG 19 and HSG 20 sites;
- The internal pedestrian and cycle routes within the proposed sites; or the
- Core Paths and wider west Edinburgh active travel network.

Graphic 2.3 indicates the existing and committed active travel network within, adjacent to and directly accessible with the site, including Cammo Walk upgrade, the Green Corridor with the proposed railway bridge west of Edinburgh Gateway station, the A8 cycleway upgrade and the West Edinburgh Active Travel Network (WEATN) with the proposed railway bridge west of The Gyle railway station (to be delivered as part of the Council's West Edinburgh link).



**Graphic 2.3** Existing and Committed Active Travel Network

This accessibility review assumes the committed transport interventions indicated by Graphic 2.1 and 2.3 will be completed within the short term given the advanced stage of the planning and technical approvals for these works.

### 3 Review of Accessibility

#### 3.1 The Site

As noted, Graphic 2.1 and 2.3 indicate the key transport facilities in the vicinity of the site that form the basis of the accessibility review and the walk isochrones indicated by Figure 1. These account for the existing and the committed transportation interventions that will be delivered through a combination of public funding streams, such as City Deal, and through developer obligations.

#### 3.2 Pedestrian Accessibility

The site benefits from direct access onto Cammo Walk, Craigs Road and Maybury Road, all of which are being upgraded to include additional and enhanced pedestrian facilities, routes and crossings. These offer direct access to the approved residential development within the LDP allocations HSG 19 and HSG 20 that include the new Maybury Primary School and two 5-acre parks. The site will also be accessible on foot to the facilities and services within The Gyle, Edinburgh Park and to Craigmount High School and St Augustine's RC High School.

Figure 1 and Graphic 3.1 indicate that the site is within an 400m walk to the adjacent bus stops and within 1,600m of the Edinburgh Gateway tram and rail stations, offering direct access to the wider catchment.

Graphic 2.3 identifies the site's access to the wider catchment via the existing and committed active travel network in west Edinburgh including connectivity with the National Cycle Network, Core Paths and Quiet Routes.

## 3.3 Cycle Accessibility

The isochrones for cycling will extend up to 5 km and include the majority of west, north-west and south-west Edinburgh, including the city centre.

As indicated by Graphic 2.1 and 2.3, the site is bisected by Cammo Walk, adjacent to Craigs Road and Maybury Road and close to Turnhouse Road, which are all being upgraded to accommodate designated cycle routes. The site will also have direct access to the committed Green Corridor and the associated railway bridge. These routes will lead onto the designated national cycle routes Core Paths and Quiet Routes throughout Edinburgh and the central belt of Scotland indicated by Graphic 2.3.

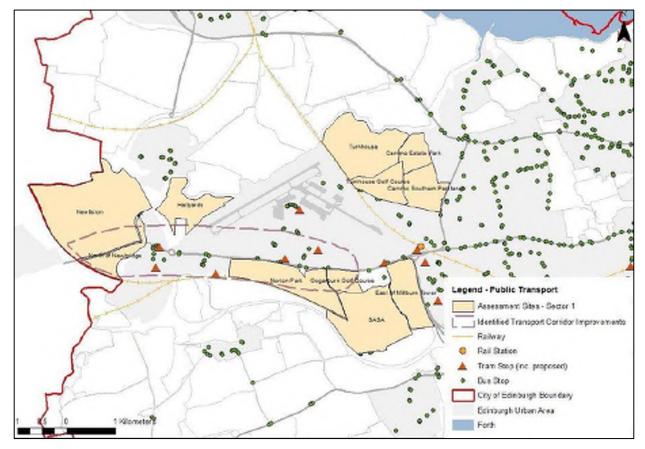
The site's accessibility by bike will also be enhanced by the allocated and committed cycle schemes being delivered by the Council and other public sector funding streams including the West Edinburgh Active Travel Network (WEATN) and the ongoing enhancement and completion of the A8 cycleway.

# 3.4 Public Transport Accessibility

The Council recognises the importance of delivering and planning for reliable and frequent public transport services as the sustainable alternative to the private car for medium and longer distances. The Council recognises the benefits of locating mixed use higher density development within the West Edinburgh Strategic Development Area, which is currently highly accessible by different forms of public transport and that will benefit from allocated and committed enhancements to the active travel and the public transport provision.

The importance of public transport within west Edinburgh has resulted in the Governments' and the Council's joint commitment to £38M through the Edinburgh City Deal towards public transport improvements in the vicinity of the site.

Graphic 3.1 is an extract from the Council's City Plan 2030 Housing Study dated January 2020. This presents what the Council believes to be the public transport facilities in west Edinburgh.



Graphic 3.1 Extract from City Plan 2030 Housing Study – Public Transport

The Council's summary of the public transport facilities identified by Graphic 3.1 does not however, allow for the full extent of the committed or proposed public transport routes indicated by Graphic 3.2 or 3.3, which include the diversion for the 31 service buses through the HSG 19 site on Turnhouse Road and Craigs Road and potentially through the site.

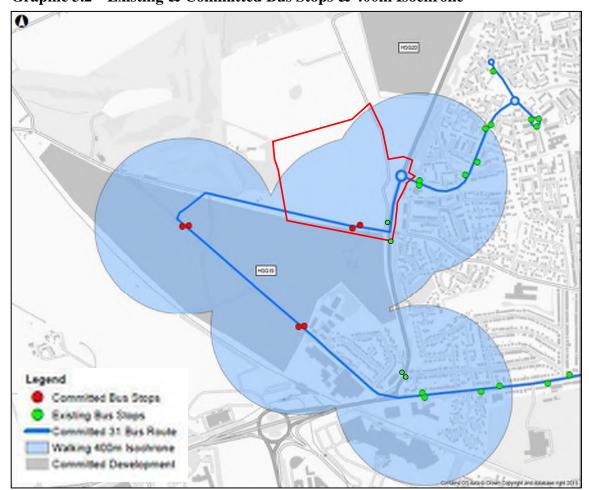
#### 3.4.1 Service Buses

As indicated by Graphic 3.1, 3.2, 3.3 and Figure 1, the site is located adjacent to and within 400m of the existing bus halts on Maybury Road, Maybury Drive and Turnhouse Road.

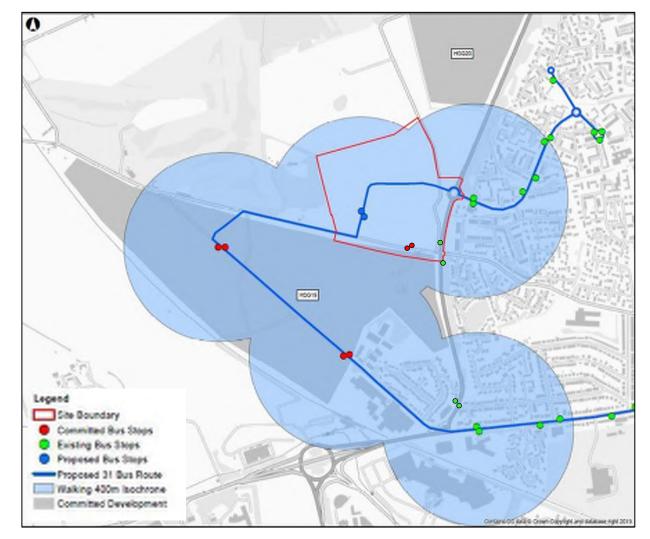
The site will also be located within 400m of the committed bus halts on Craigs Road that will serve the diverted 31 service buses through the allocated HSG 19 site, which has been agreed with Lothian Buses and discussed with officers of the Council. This is presented in Graphic 3.2 and indicates that the site will remain within 400m of the diverted 31 service.

The development of the site itself would also provide the option to divert buses through the site and to/from Maybury Drive and East Craigs via the main site access at the amended Bughtlin Roundabout. This arrangement is predicted to provide greater resilience and reduced journey times for the diverted 31 service buses. This option would also create additional opportunities for bus operators to deliver alternative and/or amended bus services and enhance bus provision across west Edinburgh.

Figure 1 indicates the location of the existing bus stops and Graphic 3.2 and 3.3 also include the committed and the proposed bus stops for the diverted service 31 buses.



Graphic 3.2 Existing & Committed Bus Stops & 400m Isochrone



Graphic 3.3 Existing, Committed & Proposed Bus Stops & 400m Isochrone

Graphic 3.2 and 3.3 indicate the 400m (short) walk from the bus stops, indicating that the site is and will be accessible to the existing, the committed and the proposed service buses. Table 3.1 summarises the current buses that serve the site and the service frequencies as at February 2020, pre-Covid-19 special measures.

**Table 3.1** Existing Service Buses

Bus Operator	Service No.	Key Locations Served	Weekday Frequency (buses/hr)
Lothian Buses	31	East Craigs-Corstorphine-Edinburgh city centre- Lasswade-Bonnyrigg Toll then Cockpen Rd or Polton Mill	6
Waverley Travel	68	The Gyle-Turnhouse Road-Craigmount High School-Corstorphine-Clermiston	1

The site is and will be highly accessible to frequent service buses that serve key residential and economic centres within Edinburgh. The site would also facilitate enhanced services and/or route changes throughout west Edinburgh.

## 3.4.2 Edinburgh Trams

Figure 1 indicates that the Edinburgh Gateway tram halt is located within 1,600m of the site and accessed via the Green Corridor, including the new railway bridge.

The trams operate a 7-minute frequency during the day and a 10-minute frequency before 0700 and after 1900. The tram provides access to the Airport and to a wide catchment to the west of Edinburgh including The Gyle, Edinburgh Park, Hermiston, Sighthill, Broomhouse, Stenhouse, Haymarket and the city centre.

The Council is currently in the process of delivering the extension of the tram network from York Place to Leith and Newhaven and is considering additional routes as part of the emerging City Mobility Plan and 2030 City Plan.

#### 3.4.3 Rail Services

Figure 1 indicates that the Edinburgh Gateway railway station is located within 1,600m of the site and like the Edinburgh Gateway tram halt, will be accessed via the Green Corridor, including the new railway bridge.

Edinburgh Gateway railway station is located on the East Coast Mainline and is currently served by the Fife Circular services and to locations such as Inverness, Perth, Kirkcaldy, Dundee and Arbroath. All services deliver direct access to Edinburgh city at Haymarket and to Waverley, which deliver access to the national catchment. The Fife Circular services operate circa 3 trains per hour while the services to Aberdeen and to Inverness each operate circa 2 to 3 trains per hour.

# 4 Summary and Conclusion

# 4.1 Summary

Ove Arup & Partners Ltd has been commissioned by West Craigs Ltd to review the accessibility of the land to the north of Craigs Road and west of Maybury Road, located between the adopted Local Development Plan allocation HSG 19 (Maybury) to the south and HSG 20 (Cammo) to the north.

The review considers the accessibility of the site by active and sustainable forms of travel in accordance with current national and local guidance and the established movement hierarchy of pedestrians, cyclists and public transport.

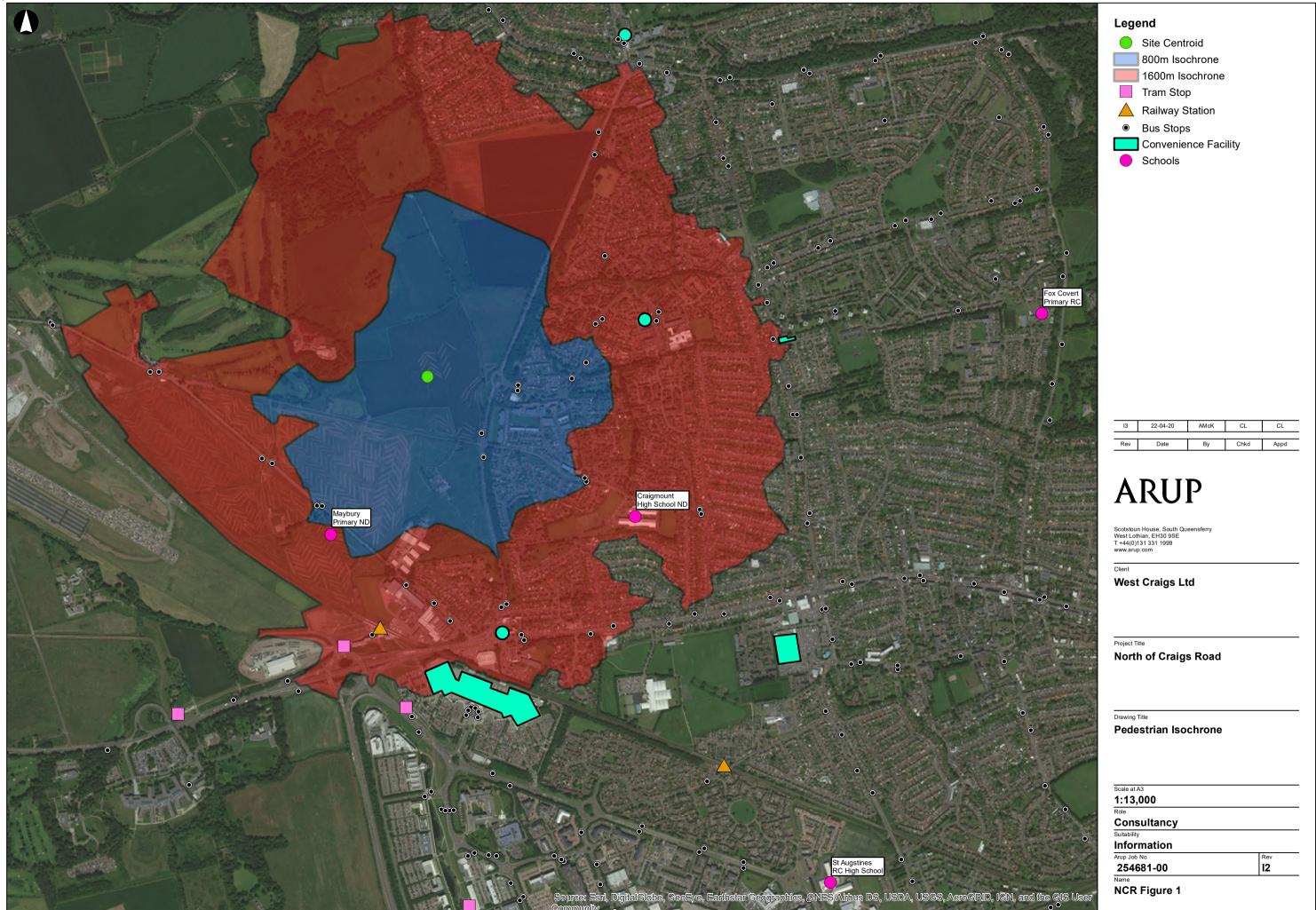
The review considers the site in the context of the existing and the forthcoming committed transport interventions and the allocated and approved development in west Edinburgh.

#### 4.2 Conclusion

This review identifies that the site to the north of Craigs Road is highly accessible by the existing and the forthcoming active and sustainable forms of travel and is accessible to a significant catchment within central Scotland and within Edinburgh city.

This review concludes that the direct access to active and sustainable travel supports sustainable development within the site in accordance with the LDP Policy Tra 1.

# **Figures**



Appendix 6 Report to Development Management Sub Committee 18.3.20 (App Ref: 19/05051/AMC)	Report to Development Management Sub Committee 18.3.20 (App Ref: 19/05051/AMC)			

# **Development Management Sub Committee**

# Wednesday 18 March 2020

Application for Approval of Matters Specified in Conds 19/05051/AMC.

at Land 195 Metres South Of West Craigs Cottage 85, Craigs Road, Edinburgh.

Application for approval of matters specified in conditions 1, 2, 3, 4 and 5 of planning permission 16/05681/PPP for erection of 250 residential dwellings (Scheme 2)

Item number

Report number

Wards

B03 - Drum Brae/Gyle

# **Summary**

The principle of the proposed development has been established through planning permission in principle reference 16/05681/PPP.

The proposal delivers 250 housing units within a well-designed landscape setting that affords a good quality of internal and external amenity to future residents. Affordable housing units will be delivered at the site and improvements to the surrounding road network including Edinburgh Local Development Plan (LDP) proposal T17 Craigs Road Junction will be introduced. Active travel measures are appropriate and strategic site features including a central active travel green corridor and buffer planting fulfil key parts of the LDP site brief for housing allocation HSG 19. The retention and re-purposing of existing features including West Craigs farmhouse and stone walling at the site help to create a sense of place.

The details of the proposal are in accordance with the planning permission in principle and the applicable policies and objectives of the Edinburgh Local Development Plan. There are no material considerations to outweigh this conclusion.

## Links

# Policies and guidance for this application

LDPP, LDEL01, LDES01, LDES02, LDES03, LDES04, LDES05, LDES06, LDES07, LDES08, LDES09, LEN08, LEN09, LEN12, LEN16, LEN21, LEN22, LHOU01, LHOU02, LHOU03, LHOU04, LHOU06, LTRA01, LTRA02, LTRA03, LTRA04, OSS1, NSG, NSGD02,

# Report

Application for Approval of Matters Specified in Conds 19/05051/AMC

at Land 195 Metres South Of West Craigs Cottage 85, Craigs Road, Edinburgh.

Application for approval of matters specified in conditions 1, 2, 3, 4 and 5 of planning permission 16/05681/PPP for erection of 250 residential dwellings (Scheme 2)

#### Recommendations

**1.1** It is recommended that this application be Approved subject to the details below.

### **Background**

#### 2.1 Site description

The application site, measuring approximately 12.6 hectares, is situated to the west of Edinburgh in close proximity to key arterial roads including Maybury Road (A902) which is adjacent to the site's east boundary and offers connections to the Maybury Road/Glasgow Road junction to the south.

The application site includes Craigs Road to the north and the junction with Maybury Road (A902) and Cammo Walk to the north east. The West Craigs housing area and industrial estate are situated to the southern edges of the site. The western site boundary is defined by a fence, with arable land comprising the remainder of HSG19 Local Development Plan (LDP) Housing Proposal lying beyond. The eastern site boundary is defined by Maybury Road including some mature trees and a rocky escarpment.

The site generally slopes southwards from the Craigs Road ridgeline at the north, but is undulating with some relatively steep slopes towards its southern and south western boundaries. The highest parts of the site occur at the eastern boundary with Maybury Road and at the north western corner. The lowest areas lie to the south east and south west corners. West Craigs Farm is situated within a localised dip in the site.

West Craigs farmhouse and associated farm steading are situated within the northern part of the site, this being accessed via a private lane from Craigs Road. West Craigs Cottage, a single storey, dwelling lies adjacent to Craigs Road at the entrance to West Craigs Farm. A telecommunications mast is situated at the north western corner of the site. A water main and wayleave crosses the site between the south west and north east corner, to the junction with Craigs Road.

The site comprises mainly uncultivated grassland with rocky outcrops and small clusters of trees in the southern part of the site and in the vicinity of the dwellings. A mature hedgerow forms the boundary to Craigs Road with stone walls defining the lane and boundaries to West Craigs Farm.

The residential areas to the south and east of the site are generally characterised by low rise suburban and flatted development. The Cammo Park Estate, a Designed Landscape and Historic Garden Inventory Site, lies 440-490 metres to the north of Craigs Road. Cammo Walk, a country lane providing a connection from Cammo to Craigs Road/Maybury Road junction, enters the site at the north east corner.

The application site covers the north western extents of Housing Proposal HSG19 as defined in the LDP. The application boundary also includes areas of land (approximately 30-80 metres depth) to the north of Craigs Road this comprising part of the Edinburgh Green Belt. Proposed improvements to the Craigs Road/Maybury Road junction are identified as LDP Proposal T17.

#### 2.2 Site History

- 23 December 2013 Proposal of application notice approved for erection of residential development with associated access, landscaping and open space (application reference: 13/05073/PAN);
- 23 April 2015 Planning permission in principle refused for residential development with associated transport infrastructure, landscaping and open space. Reasons for refusal included: non-conforming use; air quality; and transport infrastructure delivery. Application site area is similar to that of application 16/00837/PAN (described below) but excluded areas to north of Craigs Road and east of Maybury Road (application reference: 14/03502/PPP);
- 4 December 2015 Appeal against refusal dismissed. Main reason for refusal: the second Proposed Local Development Plan being under examination by Ministers, the application was premature and would undermine plan-making process (DPEA reference: PPA-230-2153);
- 13 April 2016 Proposal of application notice approved for 'Erection of residential development with associated access, landscaping and open space' (application reference: 16/00837/PAN); and
- 03 October 2019 Planning permission in principle was granted for 'Residential development with associated transport infrastructure, landscaping and open space (scheme 2)' (application reference: 16/05681/PPP).

Associated HSG 19 site history partially including the application site:

20 April 2017 - Application for Planning Permission in Principle was refused for 'Residential development, up to a maximum of 1400 units, and ancillary commercial (Class 1 retail and Class 2 financial and professional) including landscaping, access and services and all other ancillary development' at Site 100 Metres North East Of 19 Turnhouse Road Edinburgh. In summary the application was refused for reasons including loss of green belt, landscape impact, transport infrastructure delivery, drainage and flood risk, insufficient environmental assessment information and failure to outline a comprehensive design approach (application reference: 16/04738/PPP);

26 September 2019 - Appeal against refusal of application 16/04738/PPP was granted by Scottish Ministers for 'residential development, up to a maximum of 1,400 units, and ancillary commercial (class 1 retail and class 2 financial and professional), including landscaping, access and services and all other ancillary development at 100 metres north-east of 19 Turnhouse Road, Edinburgh (appeal reference: PPA-230-2207);

12 November 2019 - Application for Approval of Matters Specified in Conditions of planning permission in principle PPA-230-2207 (City of Edinburgh Council reference 16/04738/PPP) in respect of conditions 1, 2, 3, 4 and 5 is currently pending consideration (application reference: 19/05599/AMC); and

19 November 2019 - Application for Approval of Matters Specified in Conditions of planning permission in principle PPA-230-2207, in respect of conditions 6(c), 6(d), 6(e), 7, 8, 10, 11, 12, 13, 14, 16, 18, 19, 20 and 21 is currently pending consideration (application reference: 19/05514/AMC).

### Main report

#### 3.1 Description of the Proposal

This application seeks approval of matters specified in conditions 1-5 of planning permission in principle (PPP) 16/05681/PPP and includes the erection of 250 dwellings. A summary of conditions 1-5 is included in Section 3.3 a) of this report.

Taking reference from the Edinburgh LDP Site Brief for HSG 19 and the terms of the extant PPP, 250 dwellings are proposed at the site consisting of market and affordable housing. Market housing comprises 7 x five bed houses, 62 x four bed houses, 65 x three bed houses, 44 x two bed houses and 9 x two bed apartments within a single block. Affordable housing includes 12 x three bed houses, 15 x two bed houses and 36 x two bed apartments which are within four separate apartment buildings with a configuration of 9 x apartments per block. Gardens are located to the rear of all houses and communal garden spaces are included at apartment buildings.

Proposed materials for housing units and apartments include white render, brick and brick base course, reconstituted stone and slate grey coloured roof tiles. The application includes the retention and refurbishment of West Craigs Farmhouse and its immediate grounds. Demolition at the site includes farm steading buildings, a bungalow along Craigs Road and dry-stone walling near the farmhouse. Demolition material will be reused in selected areas of the site.

Boundary enclosures throughout the site include brick screen walling with timber fencing, mixed hedging, mortared stone walls, galvanised steel railings, screen timber fencing and post and single rail fencing.

Structural landscape planting at boundaries include the introduction of a large woodland and grass planted buffer at the north of the site and additional woodland screening at the east boundary. A green corridor is proposed and includes a five metre-wide active travel path leading from north-east/south-west route that connects with Cammo Walk and the remainder of HSG 19 onwards to Edinburgh Gateway station. Pedestrian and active travel paths at the east and north boundaries of the site will connect to the central green corridor.

Three park areas are proposed within the site including a new 'Maybury Park' (approx. 8,550sqm.) at the west of the site which is a Local Equipped Area of Play. A Local Area of Play is situated at the grounds of the refurbished farmhouse and steading and a Local Area of Play is also situated at the south of the site in close proximity to affordable housing. Other areas for recreation include two multi-functional SUDS areas that can be used as informal sport pitches, the central green corridor and a mulch path within the woodland buffer at the north of the site.

Transport improvements specified in the application include an upgrade of the Craigs Road/Maybury Road junction in response to LDP proposal T17 and widening of Craigs Road to 7.3 metres with a five metre-wide cycle path separated from the road by a two metre verge. Five metre-wide pedestrian and active travel links at the site's east boundary connect to the green corridor active travel link and Maybury Road.

Two vehicular access points are located at the north of the site taken from Craigs Road, one of which will be a one-way entrance. Vehicle parking spaces numbering 254 (including 12 disabled and four Electric Vehicle (EV) charging spaces) are proposed these comprise 83 spaces in front of properties in drives and 169 within courtyards around the site. There are two car club spaces located at the south of the site and six secure motorcycle spaces. Bicycle parking is comprised of 72 secure cycle parking spaces at apartment buildings and a further 18 at public locations.

Drainage infrastructure at the site includes two underground storage tanks at the northeast and south of the site.

The applicant submitted a suite of supporting documents and studies in support of the application and these are available to view on the Planning and Building Standards Online services:

- Planning statement;
- Design and access statement;
- Visual appraisal and landscape photomontages;
- Masterplan and Development Framework plan;
- Hard and soft landscape plans;
- Landscape Management and Maintenance Plan;
- Site section plan(s);
- Bird hazard management plan;
- Noise impact assessment;
- Ecological assessment;
- Sustainability Statement;
- Tree retention and removal plan;
- Detailed plans including building elevations, floor plans and boundary treatments;
- Topographical survey showing existing site levels;
- Proposed site and finished floor levels;
- Drainage statement with layout plans and technical appendices;
- West Craigs Farmhouse Feasibility Study and
- Archaeological Written Scheme of Investigation.

#### Scheme 1

During the assessment process minor amendments were made to the site's layout and design to better accommodate active travel and pedestrians as well as improvements for refuse collection. A wider variety of materials were also introduced to the affordable housing units and the location of proposed Golden Share affordable units was amended. A revised phasing plan was included to deliver the central active travel corridor pathway earlier in the site's delivery.

#### 3.2 Determining Issues

Section 25 of the Town and Country Planning (Scotland) Act 1997 states - Where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise.

Do the proposals comply with the development plan?

If the proposals do comply with the development plan, are there any compelling reasons for not approving them?

If the proposals do not comply with the development plan, are there any compelling reasons for approving them?

#### 3.3 Assessment

To address these determining issues, the Committee needs to consider whether:

- a) the development complies with the planning permission in principle;
- b) whether the application complies with the site brief within the development plan;
- c) the layout and design of the development is acceptable;
- d) the proposals are detrimental to the amenity of future occupiers and neighbours;
- e) access, movement and road arrangements are acceptable;
- f) impact on equalities and human rights are acceptable;
- g) there are any other material considerations and
- h) the representations have been addressed.

#### a) Compliance with the Planning Permission in Principle

Planning Permission in Principle (PPP) was granted for residential development with associated transport infrastructure, landscaping and open space on 03 October 2019 (planning application reference: 16/05681/PPP). The PPP was granted subject to 15 conditions and the applicant has now submitted a subsequent Approval of Matters Specified in Conditions (AMC) planning application to approve matters required by Conditions 1 - 5 of the PPP.

The requirements of each of the PPP conditions 1-5 can be summarised as follows:

Condition 1 - restricts any development at the site or the submission of AMC applications until a detailed masterplan and site layout is prepared, submitted and approved by the planning authority;

 A detailed masterplan and site layout has been submitted by the applicant in accordance with the terms of Condition 1.

Condition 2 - requires the masterplan for the site to substantially reflect approved indicative designs at the PPP stage and to take cognisance of proposals for the wider LDP allocation at HSG 19. The condition also sets out a list of information requirements including detail such as SUDS, landscaping, noise impact, site levels, access arrangements, clearance plan, protected species survey and an archaeological mitigation strategy that is required to accompany the masterplan and site layout;

The submitted masterplan and site layout substantially reflect approved plans from the PPP stage. The applicant has included pedestrian/active travel links and a vehicular road alignment to connect the application site to the wider HSG 19 allocation. Structural landscape planting also ensures the application site will integrate well with the neighbouring HSG 19 site. Supporting information identified in the condition has also been submitted and the application complies with the requirements of PPP condition 2.

Condition 3 - requires the applicant to submit a phasing framework plan for delivering the entire development at the application site and specifies items that must be identified and the timing of their delivery;

 The applicant's phasing framework includes information with regard to the delivery of each of the development phases, number of units in each subphase, strategic landscaping and open space, play provision, woodland management, SUDS and pedestrian, cycle and vehicular links. The terms of PPP condition 3 are satisfied.

Condition 4 - specifies that the masterplan and site layout submission required by Condition 1 must include for the retention and re-modelling of West Craigs farmhouse and related garden walls. Further requirements with regard to the re-use of materials from demolition of former steading buildings is set out;

 The applicant has confirmed via the masterplan and site layout, design statement and Farmhouse Feasibility Study that the farmhouse will be retained, and stone walls will be conserved or re-used throughout the site. Condition 5 - sets out a range of matters that the applicant must address in detail to support the AMC application for the masterplan and site layout. Information required includes: site levels; site drainage information; detailed landscape plans for the site; road and junction layouts including access to the site; a noise impact assessment; archaeological evaluation and mitigation strategy; site investigation; protected species survey; survey of trees and hedgerows near Craigs Road and a site clearance plan;

 Information submitted by the applicant, as detailed in the description of the development within this report, comprehensively addresses the matters specified in Condition 5 of the PPP.

The submitted details substantially reflect approved plans from the PPP stage. Key site features such as the 30 metre woodland buffer at the north of the site, upgrading of Craigs Road / Maybury Road junction, a central green corridor and active travel improvements have been taken forward by the applicant. The masterplan layout includes feature buildings and retention of the West Craigs Farmhouse with reference to its former steading area through the inclusion of lower one storey bungalow properties. Other aspects of the design like refuse collection areas, site access and parking provision, drainage and SUDS layout, landscape and tree information, public and open spaces, heights of buildings and phasing of works broadly address the requirements of Condition 5.

Each of these conditions are now considered in detail in the following paragraphs in relation to the creation of an attractive sustainable place.

#### b) Development Plan Site Brief

The principle of the proposal in development plan terms was established at the PPP stage. The application site falls within the LDP allocation HSG 19, with the exception of a small area of land to the north of the site which is included to allow for the upgrading of the Craigs Road junction with Maybury Road. Part 1 a) of LDP Policy Hou 1 specifies that priority will be given to delivering the housing land supply and necessary infrastructure identified in Part 1 Section 5 of the plan and Table 4 of the LDP; the application accords with this policy by proposing housing at the site.

The LDP specifies various development principles for the site which strongly influenced the applicant's indicative masterplan at the PPP stage, whilst proposal T17 to upgrade the Craigs Road and Maybury Road junction is also identified in the LDP and its Action Programme. The applicant's proposed masterplan has continued to comply with the LDP site brief and junction upgrade requirements from the PPP stage and the proposal accords with the general aims of the site brief for this part of HSG 19.

#### c) Layout and design of the development

#### Layout and design

LDP policies Des 1 - Des 9 provide the policy framework which must be considered for this AMC application. Other relevant policies relating to housing and environment and the Edinburgh Design Guidance must also be considered.

The site's proposed layout is influenced significantly by the LDP site brief and the terms of the PPP. Accordingly, the applicant has developed a clear design concept for the proposal which is set out in a supporting Design and Access Statement and Development Framework plan.

Properties will largely be located on two large development platforms either side of the water mains that bisects the site. Layout is also dictated by the site's topography which is sloping and undulating in places and has influenced the location and form of open/landscaped spaces including a proposed new Maybury Park.

LDP policy Des 4 (Development Design - Impact on Setting) supports development which has a positive impact on its surroundings through height, form, scale, position of buildings and materials. The development proposal includes a mix of two storey, detached, semi-detached, terrace and three storey apartment properties with pitched roofs. Throughout the site, 21 buildings with dual frontages at key locations are included and this design approach offers a degree of variation; this approach has also been taken in accordance with the Development Framework plan that was developed at the PPP stage and further detailed with this AMC application.

In line with PPP conditions and the Development Framework for the site, 14 bungalow properties are included in the area south of the former West Craigs Farmhouse as a reference to the former steading buildings that served the farmhouse. The bungalow properties utilise reconstituted stone on front facing elevations and will have slate coloured roofs. Building materials include a mixture of brick, render and slate coloured roof tiles. The scale, height and form of buildings at one, two and three storeys is appropriate for a suburban style scheme and properties are well-positioned with regard to open spaces at the site. The proposal is acceptable in the context of LDP policy Des 4 (Development Design - Impact on Setting).

The application site's layout includes a mix of 'design areas' where a clear sense of place is established through building orientation and design, landscape planting, street and path layout and open spaces. For example, the main entrance area from Craigs Road includes front facing brick buildings, rebuilt stone walling to provide a reference to the site's previous use and a strong visual connection to the former farmhouse building. The area immediately to the south of the former farmhouse also demonstrates a well-designed response with lower bungalow properties and a strong visual connection along a primary street that connects to the south of the site. These aspects of the proposal demonstrate and clear design concept and accord with LDP policy Des 1 (Design Quality and Context).

The retention and re-use of existing features at the site such as West Craigs farmhouse, dry stone walling and trees at the eastern boundary adds to the site's design and complies with LDP policy Des 3 (Development Design - Incorporating and Enhancing Existing and Potential Features).

LDP Policy Des 2 (Co-ordinated Development) states that planning permission will be granted for development which will not compromise the effective development of adjacent land, or the comprehensive development and regeneration of a wider area.

In this instance, the proposed plans show east-west connections to the remainder of the HSG 19 housing allocation to the west through the strategic green corridor, a pathway from the large park at the site's west boundary which is shown in the LDP site brief, and via a vehicular access at the northwest boundary. A pedestrian and active travel path at the north of the site along Craigs Road will also connect with neighbouring proposals at HSG 19.

Proposed property frontages generally face-on to streets and open spaces including the central green corridor, whilst vehicle parking does not dominate the street scene and incorporates landscape planting as required by LDP policy Tra 4 (Design of Off-Street Car and Cycle Parking).

Boundary treatments between housing plots around the site are varied with a mixture of timber screen fencing, screen walls, and post and rail fences. Acoustic screen fencing is used in selected plots as specified below within this report. Other boundary treatments utilised around the site such as open spaces and key entrance points include natural stone walling and bow top metal fencing. Boundary fencing typically measures between 1.2 metres and 1.8 metres in height.

Overall the applicant has demonstrated a comprehensive design approach to the layout of buildings, streets, active travel paths and open spaces at this site.

#### **Density and mix**

The proposed density was established at the PPP stage and no material change in policy or planning guidance has occurred in the intervening time. The PPP limits development to 250 units at the site and in light of constraints at the site including a water main and challenging topography the proposed density is proposed to be approximately 20 units per hectare. With reference to the surrounding area the layout and spatial character broadly reflects existing housing areas to the south and east of the application site through the inclusion of large green spaces, private gardens and street layout at a local scale. The proposal will not result in damage to local character, environmental quality or residential amenity and is acceptable with reference to the terms of LDP policy Hou 4 (Housing Density).

The proposed mix of units provides accommodation for growing families in the form of housing and apartment buildings including affordable housing. The proposed accommodation schedule provided by the applicant offers a choice of housing types and sizes, including 14 bungalow properties. This mix of properties complies with LDP policy Hou 2 (Housing Mix) and the Edinburgh Design Guidance.

Affordable housing is provided a rate of 25% consisting of 63 units provided on-site. The affordable housing is largely located at the south of the site, although 16 Golden Share properties are pepper potted around the site. Affordable units offer a mix of 15 x two bedroom houses, 12 x three bedroom houses and 36 x two bedroom apartments. The affordable housing includes a variety of house types and sizes across the site. Materials utilised for affordable properties are reflective of the wider site, although the proposed mix includes a higher ratio of two bed properties in comparison to the development as a whole. No four and five bedroom houses at the site are allocated as affordable housing.

The Council's Affordable Housing service notes that the approach taken by the applicant will assist in the delivery of a mixed and sustainable community at this site despite a preference for more three bed properties at the site. The proposal includes 25% affordable housing in accordance with the objectives of LDP policy Hou 6 (Affordable Housing). Affordable housing tenure types will be secured via the legal agreement that was concluded at the PPP application stage.

#### Landscape and visual considerations

At the PPP application stage several structural landscape zones for the site were established. The applicant has now taken this concept forward in more detail with nine different landscape zones introduced around the site including each of the buffer planting areas, public parks and the central green corridor.

LDP policy Des 9 (Urban Edge Development) requires development proposals at the urban edge to conserve and enhance the city's setting, promote access to the countryside if appropriate and include landscape proposals that will strengthen the greenbelt. The application site is visually prominent in the surrounding area due to its topography which is undulating and slopes from north to south with views along the Almond valley out to the Pentland Hills.

The implementation of a woodland buffer at the north of the site introduces a strong boundary with green belt land which lies on the opposite side of Craigs Road at the north of the site; this delivers a key element of the LDP site brief for HSG 19. The north of the site is particularly prominent where the site's ridgeline follows Craigs Road; photomontages at years one, 10 and 20 provided by the applicant demonstrate that the proposal will integrate sensitively with the surrounding landscape. Sections provided by the applicant also show that properties at the north of the site will be effectively screened by woodland planting, with property floor levels generally four metres below the site's ridge level. High density tree and shrub planting at the south and east boundaries of the site will afford good levels of screening for future residents and external visual receptors as well. The introduction of strong landscape planting at prominent site boundaries accords with the provision of LDP policy Des 9 (Urban Edge Development).

LDP policy Des 8 (Public Realm and Landscape Design) supports development where landscape and open spaces are designed as an integral part of the overall scheme. Within the application site a good quality landscape environment is provided including grassed areas, shrubs, hedges and trees and these features will assist in creating a sense of place. Planting densities are tailored in response to different parts of the site; buffer and boundary planting areas have higher densities whilst parks and open spaces are more sparsely planted to allow for appropriately sized grass amenity spaces. Residential streets will include grass verging with hedging and trees in selected intervals. Hard landscaping in the form of timber benches, paths and concrete edging, wet pour rubber surfacing in Maybury Park, cycle stands, bins and fencing is acceptable throughout the site. In response to the site's topography Maybury Park will also feature gabion baskets filled with site-won stone.

The proposed development is generally well-equipped with open spaces including three local parks; a 'Local Area of Play' (LAP) is situated at the south of the site in close proximity to affordable housing and a second larger 'Local Equipped Area of Play' (LEAP) to be named Maybury Park is situated at the west of the site. A LAP is included in the grounds of the former farmhouse as well whilst a small public seating and garden area is located opposite the farmhouse building in the north of the site. The parks contribute to the delivery of a green network in this part of the city and make a positive contribution to the landscape setting at the site and surrounding area. Each of the parks are designed to be overlooked to a degree and play equipment is proposed to complement the areas of grassed open spaces. It is recommended that a condition is added to secure details of play equipment.

The proposed central green corridor, required by the HSG 19 site brief, is provided within the site offering pedestrian and active travel links to the surrounding area. Section plans and detailed landscape drawings show that this part of the site will include a variety of trees, shrub planting and grassed areas. The Council's Open Space Strategy 2021 refers to the implementation of the green corridor in this location as an important new strategic feature in this part of the city and the proposal is an important structural landscape feature within the site.

The applicant's landscape maintenance and management plan specifies how areas of landscape will be maintained from years 1-15 of the development and it is recommended a condition is attached to this permission to ensure the proposed landscape is successfully delivered at the site.

The landscape aspects of the proposal comply with LDP policies Des 1 (Design Quality and Context), Des 3 (Development Design - Incorporating and Enhancing Existing and Potential Features), Des 4 (Development Design - Impact on Setting c)), Des 7 (Layout Design a) and f)) and Des 8 (Public Realm and Landscape Design).

#### Design summary

The applicant has demonstrated a design-led approach to delivering development unique to this site which is demonstrated through the Design and Access Statement, Development Framework plan and detailed drawings. The site's topography, boundary treatments, existing features, proposed layout and quantum of development delivers a good environment for future residents and accords with the broad design objectives of the LDP and many aspects of the Edinburgh Design Guidance.

#### d) Amenity

#### **Future residents:**

Future residents at this proposed development will be afforded a good level of internal and external amenity. Unit sizes accord with the Edinburgh Design Guidance recommendations and offer variation with reference to mix, size and type. Other aspects of the design such as location of refuse stores, a design layout that promotes natural surveillance and layout of buildings to reduce any inter-visibility between properties ensures future residents are provided with a good living environment.

The proposed layout and building design ensures a good standard of privacy will be secured for future residents, whilst properties will receive adequate daylight and sunlight in line with the recommendations of the Edinburgh Design Guidance. Each detached and semi-detached house will include a front and rear garden area; garden boundaries include hedging at the front and fencing varying in height from approximately 1-1.8 metres at the rear. Ground floor apartment buildings benefit from private garden spaces. Upper floor apartments can access shared gardens where hedging provides a suitable enclosed space and apartment buildings are also in locations that can easily access parks and amenity spaces around the site.

Open space provision in the form of three parks and a linear park space provides good quality outdoor amenity space for the development as a whole. Two multi-functional SUDS areas at the north and south of the site also provide recreational areas of grass. Approximately 35% of the site comprises various landscape/grassed areas and parks which complies with the requirement of LDP policy Hou 3 a) that 20% of the site must be useable green space. The distinction between public and private spaces also accords with LDP policy Des 5 d).

Play equipment and a 100 metre running circle will be provided in Maybury Park and the smaller two local parks. Two multi-functional SUDS areas can also be used as kickabout spaces and active travel routes, allowing for good opportunities to move around the site. These features provide future residents with a good external environment.

The PPP required the applicant to carry out further noise assessment to ensure future residents will enjoy a good noise environment. The supporting noise assessment includes mitigation measures in the form of acoustic barriers for 17 gardens in close proximity to Maybury Road near the application site's eastern boundary as well as acoustic glazing in one of the bedrooms at plot 117. The Council's Environmental Protection service has requested the installation of three metre acoustic barrier at the garden spaces. However, in the interests of achieving appropriate levels of daylight and outlook for future residents a 1.8 metre boundary is proposed and will still achieve an appropriate external noise environment for future residents. The Council's Environmental Protection service does not object to this design solution.

The proposal complies with the objectives of LDP policy Des 5 (Development Design - Amenity).

#### Surrounding area and neighbours:

The nearest neighbouring properties are located at the site's southern boundary at West Craigs Crescent where gardens abut the site's boundary. Proposed terraced housing and apartment buildings at the application site are generally over 12 metres away from the mutual boundary with these properties and building to building distances are in excess of 30 metres. Properties to the east at East Craigs Rigg are over 70 metres from the proposed development across Maybury Road. There will be no adverse effects on the amenity enjoyed by these neighbours in terms of noise, privacy, odour or daylight and overshadowing.

With reference to planned housing development in the remainder of HSG 19 to the west of the application site, the applicant's proposed layout does not create a layout that would create obstacles to deliver an appropriate standard of amenity within HSG 19 for future residents. This approach complies with LDP policy Des 2 (Co-ordinated development).

The proposal does not present any issues with regard to neighbouring privacy and amenity and complies with LDP policy Des 5 (Development Design - Amenity) and the Edinburgh Design Guidance.

#### e) Access, movement and roads

#### Vehicles and parking

Vehicular access to the site will be taken from Craigs Road at the north of the site via two entrances from Craigs Road at the north of the site. The entrance closest to Craigs Road/Maybury junction will be a left-in turn only and a primary access on Craigs Road will allow for two-way traffic. The vehicular road network within the site allows for circulation around the site and road surfaces include two types of block paving throughout the site. The street hierarchy includes a primary route, secondary streets, courtyard spaces and pedestrian/active travel routes. A swept path analysis demonstrates that the site will be accessible for refuse collection in line with requirements specified by the Council's Waste Services.

Vehicular parking is provided throughout the site for detached houses either in the form of driveways or courtyard parking with spaces numbering one per property. Four electric vehicle spaces are provided in close proximity to two apartment buildings and there are two car club spaces to the south of the site in close proximity to proposed affordable housing. Six secure motorcycle spaces are provided at three of the five apartment buildings. Provision for up to 25 electric vehicle parking ducting points are included as well. Proposed levels of vehicle and motorcycle parking accords with the Council's parking standards as set out in the Edinburgh Design Guidance and the Roads Authority does not object to the proposal. Areas of paving that presented opportunity for indiscriminate parking were reduced during the application process and the proposal generally complies with the requirements of LDP policy Tra 2 (Private Car Parking).

#### Pedestrians and Active Travel

Following on from requirements identified at the PPP stage the site layout delivers a well-designed active travel network. Access points to and from the site generally allow for safe pedestrian and bicycle movement via five metre-wide segregated paths at the site's north, east and central corridor areas. Active travel links also offer good access to nearby bus (service 31 and 68) and tram (Edinburgh Gateway) stops. The proposed central green corridor acts as a key transport link from the site to the wider area, including the remainder of the HSG 19 site allocation to the south west and Cammo Walk to the north. Additional active travel paths are proposed at the site's east boundary with two access points to Maybury Road at the north and south of the site, and improvements to the Craigs Road which include a segregated active travel path for cyclists will be delivered along the site's north boundary.

The segregated cycle path will be situated along the southern side of Craigs Road and separated from the road by two metre grassed and hedge verge. The cycle route continues west along the site's northern boundary to connect with proposed neighbouring development that forms the remainder of allocation HSG 19. Within the woodland buffer planting to the north of the site a meandering woodland path is included to offer a secluded pedestrian path away from Craigs Road as well.

Ninety bicycle parking spaces are provided at apartment buildings. The bike stores are secure, situated in close proximity to each of the apartment buildings and also include a water source for washing bicycles. At the detached and terrace properties bicycle storage would be available in garden spaces. This level of provision accords with the Council's parking standards and LDP policy Tra 3 (Private Cycle Parking).

Road re-design at Maybury Road, Craigs Road and Cammo Walk

The re-design of the Craigs Road/Maybury Road junction is included as part of the application in response to requirements in the LDP (proposal T17) and the PPP and its associated legal agreement. The proposed junction layout provides signalised crossing for pedestrians and cyclists and has been designed following detailed discussion with the Roads Authority. The Roads Authority supports the proposed junction layout and the applicant's phasing plan establishes that the junction improvements will be carried out in Phase 2 prior to the site being occupied. In line with PPP condition requirements Craigs Road will also be widened to 7.3 metres.

Representations raise concern with regard to the re-design of the Craigs Road/Maybury Road junction due to its impact on vehicular use of Cammo Walk and the ability of vehicles to emerge on to Craigs Road. The junction's re-design is currently the subject of a Road Construction Consent (RCC) application. However, it is clear that Cammo Walk will not continue to operate in its current format as a result of the proposed junction design. At present the LDP and its Action Programme makes provision for a pedestrian and active travel connection along Cammo Walk to provide a north-south connection between LDP housing allocations HSG 19 and HSG 20 and other destinations in the area. The Council is responsible for delivering part of the active travel route described as 'Cammo to Maybury cycle path'; at the time of writing the LDP Action Programme dated February 2020 specifies that this infrastructure improvement is to be delivered in 2021/22. Detailed design work for this section of Cammo Walk has not begun at the time of writing and possible layouts or options will not be decided prior to this date; this is a transport improvement for the Council to deliver and is not the responsibility of the applicant.

The proposal complies with LDP policy Tra 1 (Location of Major Travel Generation Development) parts a) and c) as well as its broader objectives. Compliance with the objectives of LDP policies Tra 2 (Private Car Parking) and Tra 3 (Private Cycle Parking) has also been demonstrated by the applicant.

#### f) Other material considerations

#### **Environment Impact Assessment:**

The proposed development must be considered in the context of the relevant Environment Impact Assessment (EIA) regulations.

Since the PPP application was made by the applicant on 18 November 2016, the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2011 ('the 2011 regulations') have been superseded by The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 ('the 2017 regulations). The 2017 regulations include transitional arrangements for EIA applications submitted prior to 16 May 2017 and subsequent AMC applications. The transitional arrangements in the 2017 regulations confirm that on the basis of the PPP application to which this AMC application relates being submitted prior to 16 May 2017, the 2011 regulations continue to apply to this AMC application.

At the PPP stage, the proposed development was identified as a 'Schedule 2' development and following a screening and scoping exercise an Environmental Statement was submitted with the PPP application under the terms of the 2011 regulations.

This AMC application falls within the scope and description of a 'multi-stage consent' as defined in the 2011 regulations. Environmental information from the PPP application has been reviewed and no new environmental issues or potential significant effects have been identified. No new environmental information has been submitted with this AMC application. The AMC application complies with 2011 EIA regulations.

#### Airport:

The site is located in close proximity to Edinburgh Airport. At the PPP application stage a number of conditions were prescribed in order to ensure the proposed development complies with aerodrome safeguarding requirements, including a limit to building height of 75 metres above ordnance datum (AOD). The applicant has provided a detailed masterplan, building floor and ridge height levels, landscape and drainage plans and a Bird Hazard Management Plan to the satisfaction of the airport and there are no further requirements in relation to aerodrome safeguarding.

#### **Ecology and wildlife:**

The applicant submitted an ecological assessment with the application which established that there will be negligible loss of unexceptional habitat due to development of the site. The proposal will not lead to any impacts on nearby protected sites and the survey established no presence of badgers or bats at the site. The inclusion of structural landscape features within the application site boundary such as wide areas of buffer planting, two park spaces and a linear park will contribute to the green network in the area and the applicant's ecology assessment notes that the proposal will lead to small positive effect on biodiversity.

The proposal accords with the general objectives of LDP policy Env 16 (Species Protection).

#### Trees:

LDP policy Env 12 (Trees) establishes the policy criteria for protecting trees and woodland. There is limited tree coverage at the application site. At the PPP stage the applicant identified which trees and hedges would be retained and removed from the site after carrying out a detailed tree survey and arboricultural assessment. The applicant has submitted an updated tree and hedge retention and removal plan in support of the application. The masterplan layout substantially reflects the development framework plan from the PPP stage and therefore the level of tree removal is the same as previously specified at the PPP stage when proposed tree removal and retention was assessed to be in accordance with development plan requirements.

Trees at the site's east boundary along Maybury Road will be retained and protected by fencing during the construction stage whilst the root protection areas of trees at the site's south boundary near the neighbouring industrial estate will not be adversely affected by virtue of the proposal's position away from the boundary. Limited tree removal around the West Craigs farmhouse and the centre of the site will facilitate redevelopment of the farmhouse and wider site. A condition is recommended to ensure the applicant complies with tree protection measures.

The proposal complies with the objectives of LDP policy Env 12 (Trees).

#### Archaeology:

The applicant has provided a Written Scheme of Investigation (WSI) including a phased programme of archaeological investigation that fulfils the requirements of PPP Condition 2 vii). The City Archaeologist is satisfied that archaeological evaluation work has been carried out in compliance with technical requirements. The applicant will be required to carry out all further archaeological work in accordance with the requirements of Condition 8 of the PPP.

The applicant has demonstrated compliance with planning permission in principle condition 4 by including West Craigs farmhouse as a retained feature in the development site.

The proposal complies with LDP policies Env 8 (Protection of Important Remains) and Env 9 (Development of sites of Archaeological Significance).

#### Phasing:

The applicant is required by Condition 3 of the PPP to provide a phasing framework plan for the site. The supporting Design and Access Statement includes a detailed phasing plan (page 27) confirming that the proposed development will be delivered over seven distinct phases ranging from site clearance and enabling works through to construction and infrastructure delivery (phases 1-3). The location of each development phase is clearly presented and the number of units per phase is specified for phases 4-7 which will see construction begin on housing units. The applicant estimates that Phase 1 (site clearance) will begin following approval of reserved matters with other phases in the most part following sequentially.

Phase 4, at the north of the site, will see the first 53 units constructed and Phases 5 and 7 will follow in tandem in order to deliver affordable housing in line with the terms of the legal agreement for this development.

Strategic landscape features and all travel links will be delivered within each of the identified phases as they come forward, with the exception of the green corridor's active travel pathway which will be delivered as part of phase 4 to ensure early occupants at the north of the site can travel to the adjacent HSG 19 site. This approach ensures key strategic features including the northern buffer planting and active travel pathway will be delivered early in the site's development.

A condition is recommended to ensure the applicant adheres to the phasing plan.

#### Flooding and drainage

At the PPP stage the applicant submitted a Flood Risk Assessment which established the parameters for drainage design at the site. In response to PPP Conditions 2 (ii), 5 (k) and 15 the applicant submitted further information in the form of a Drainage Strategy, Surface Water Management Plan and accompanying SUDS plans. Subsequently, the applicant's drainage strategy identifies proposed drainage piping and sewers and porous roads surfaces as well as two areas of underground attenuation tanks at the north and south of the site. Due to the site's proximity to the airport underground tanks to the level specified are acceptable in this instance. The surface water system has been designed to ensure flooding does not occur in any part of the site during a 1 in 30 year storm with an allowance of an additional 40% for climate change. The drainage design has been checked for the 1 in 200 year storm event with an allowance of an additional 20% for climate change and no flooding occurs on the site. The grassed areas above both the underground storage tanks are approximately two to four metres lower than surrounding landscaping and can also be utilised as a multi-functional amenity area or kickabout space. Drainage and run-off from the site will not impact upon neighbouring properties.

The Council's Flood Prevention service confirms that all drainage and flooding management included within the proposal meets the Council's requirements and appropriate self-certification forms have been provided by the applicant. Flood Prevention also recommends that the applicant engage early with Scottish Water to ensure they agree to adopt and maintain underground tanks. SEPA offers no objection to the proposal.

The proposal complies with LDP Policy Env 21 (Flood Prevention) which states that planning permission will not be granted for development that would increase flood risk or be at the risk of flooding itself.

#### Sustainability:

The applicant submitted a Sustainability Statement with the application in response to Condition 5 (o) of the PPP. The statement clearly states that aspects of the development will be sustainable in nature such as sourcing of timber, non-use of tropical hardwoods, recycled uPVC windows, recycling and refuse storage provision and use of low/zero carbon equipment at the site.

The site's layout is well-designed for future residents to utilise proposed active travel routes within and beyond the site as well. Other aspects of the proposal such as the mix of unit types and proximity to major transport routes contribute to sustainable development in the city. The applicant will be further required to comply with Scottish Building Regulations and associated sustainability requirements.

The applicant has demonstrated compliance with the sustainability aspect of Condition 5 (o) and Council guidance.

#### **Other PPP Conditions:**

The applicant has sought to address conditions other than PPP conditions 1-5 as specified in the supporting planning statement for this application. In addition to addressing the requirements of PPP Conditions 1-5, the supporting information submitted with this application is be considered with reference to the following PPP conditions:

Condition 7 - A Feasibility Study submitted with the application to address Condition 4 with regard to the restoration of West Craigs farmhouse is sufficiently detailed to meet the requirements of this condition. Condition text specifying the timing for completion of the restoration works must be adhered to by the applicant. Condition 7 can be discharged alongside this AMC application (19/05051/AMC) should committee grant approval.

Condition 8 - The applicant submitted a Written Scheme of Investigation and will be required to carry out all work in accordance with the WSI and to the satisfaction of the City Archaeologist. The City Archaeologist has confirmed in the consultation response dated 17 January 2020 that this condition cannot be fully discharged until archaeological works are completed.

Condition 9 - The applicant submitted an updated Extended Phase 1 Habitat and Landscape Habitat Management Plan that can be considered to address the requirements of this condition. Condition 9 can be discharged alongside this AMC application (19/05051/AMC) should committee grant approval.

Condition 10 (a), (b) - A Site Survey and associated appendices have been submitted for consideration. The Council's Environmental Protection Service has not confirmed in its consultation response dated 31 January 2020 whether the information fully addresses this condition and this condition cannot discharged at this time.

Condition 12 - A Bird Hazard Management Plan and accompanying detailed plans have been submitted that adequately address the requirements of this condition to the satisfaction of the planning authority and Edinburgh Airport's safeguarding team. Condition 12 can be discharged alongside this AMC application (19/05051/AMC) should committee grant approval.

Condition 14 - Soft landscape and water landscaping details submitted as part of this application have been submitted to the satisfaction of the Planning Authority and the condition can be discharged alongside this AMC application (19/05051/AMC) should committee grant approval.

Condition 15 - SUDS details have been submitted with this application to the satisfaction the Council's Flood Prevention service and Edinburgh Airport's safeguarding team. This condition can be discharged alongside this AMC application (19/05051/AMC) should committee grant approval.

#### **Developer Contributions:**

A legal agreement was concluded between the Council and the applicant as part of the planning permission in principle process for application 16/05681/PPP. The details and particulars with reference to contributions for transport, affordable housing, and education will be satisfied through that agreement. It was reported to the Council's Development Management Sub-committee on 05 June 2019 that contributions for healthcare as part of this development could not be reasonably justified.

#### g) Equalities and human rights

The application has been considered with reference to equalities and human rights. The site's layout offers a good path network that will be accessible to all future residents and an appropriate number of accessible parking spaces are included within the site's layout in line with the Council's parking standards. The applicant will be required to comply with the provisions of the Equality Act 2010 and building regulation standards.

#### h) Representations

Forty four representations were submitted comprising the following material matters:

#### Material objections:

- Closure of Cammo Walk to cars leading to road safety and disconnection from Cammo to Gyle and south of Edinburgh - addressed in Section 3.3 e);
- Traffic impact on surrounding roads addressed in Section 3.3 e);
- Visual impact of the proposal addressed in Section 3.3 c);
- Proximity of neighbours and associated noise and smell disturbance addressed in Section 3.3 d);
- Environmental impact including loss of green belt and of habitat for deer, fox and rabbit - addressed in Sections 3.3 a) b) and f);
- Flats to rear of West Craigs Crescent not consistent with original plans addressed in Section 3.3 c);
- Requirement to commence redevelopment of Maybury junction prior to any works essential - addressed in Section 3.3 e);
- Object to closure of Cammo walk for vehicles with consequence of motorists having to use Cammo Road/Queensferry Road and Cammo Gardens/Maybury Road junctions instead - addressed in Section 3.3 e);
- Impact on local services including GP surgeries and schools addressed in Section 3.3 f); and
- No information on the Council website addressed in Section 3.1.

#### **General comments**

 Request that drainage impact on property to the south of the application site is considered - addressed in Section 3.3 f).

#### **Cramond & Barnton Community Council**

Cramond and Barnton Community Council objected to the proposal raising the following comments:

- Objection to the development proposal's impact on Cammo Walk from junction re-design - addressed in Section 3.3 e); and
- Lack of clarification or meaningful engagement regarding proposals for Cammo Walk - addressed in Section 3.3 e).

#### **Corstorphine Community Council**

Corstorphine Community Council raised the following comments:

 The Community Council raises concern for potential for transport and traffic impacts from junction re-design in the surrounding area and from other proposed development in west Edinburgh - addressed in Section 3.3 e).

#### Conclusion

The principle of the proposed development has been established through planning permission in principle reference 16/05681/PPP.

The proposal delivers 250 housing units within a well-designed landscape setting that affords a good quality of internal and external amenity to future residents. Affordable housing units will be delivered at the site and improvements to the surrounding road network including Edinburgh Local Development Plan (LDP) proposal T17 Craigs Road Junction will be introduced. Active travel measures are appropriate and strategic site features including a central active travel green corridor and buffer planting fulfil key parts of the LDP site brief for housing allocation HSG 19. The retention and repurposing of existing features including West Craigs farmhouse and stone walling at the site help to create a sense of place.

The details of the proposal are in accordance with the planning permission in principle and the applicable policies and objectives of the Edinburgh Local Development Plan. There are no material considerations to outweigh this conclusion.

It is recommended that this application be Approved subject to the details below.

# 3.4 Conditions/reasons/informatives Conditions:

- 1. Acoustic barriers shall be constructed as specified in the Charlie Fleming Report on Traffic and Commercial Sound (3375 12 R) dated 19 February 2020 and highlighted on page 13 of that report, to cover plots 90, 91, 92, 93, 103, 113, 120, 124, 128, 129, 130, 131, 139, 140, 142, 143 and 144 from drawing number 11491 / A / 02\_01 N, titled Development Layout, by Taylor Wimpey. Acoustic barriers shall be installed prior to the first occupation of each identified plot.
- 2. To reduce noise in bedrooms specified in the Charlie Fleming Report on Traffic and Commercial Sound (3375 12 R) dated 19 February 2020, bedroom window glazing the report refers to shall require a sound reduction index, for traffic noise, of at least 36dB. This can be achieved with glazing consisting of a minimum of 10mm and 8.8mm thick panes of laminated glass, separated by a 16mm wide cavity. The applicant shall identify and agree the specific windows that require mitigation in writing with the planning authority prior to the commencement of works at the site.
- 3. Trees specified for retention in the drawing titled 'OPEN\_284\_X004' and dated 10.10.19 (planning drawing reference number 84) shall be protected for the duration of all site preparation and construction works at the site by fencing and in accordance with the requirements of BS 5837:2012 "Trees in relation to design, demolition and construction".
- 4. The applicant shall deliver the proposed development in accordance with the details specified on the Phasing Plan presented on page 27 of the Design and Access Statement dated February 2020 Rev A.
- 5. Details of all play equipment within the Local Equipped Areas of Play and Local Areas of Play specified in approved plans shall be provided to the planning authority, agreed in writing with the planning authority and installed at the relevant locations prior to the first occupation within the site in the relevant subphase of development identified in the Phasing Plan presented on page 27 of the Design and Access Statement dated February 2020\_Rev\_A.
- 6. The approved landscaping scheme shall be fully implemented within 6 months of the completion of each phase of the development. Any trees or plants which, within a period of five years from the completion of that phase of the development, die, are removed or become seriously damaged or diseased shall be replaced with others of a size and species similar to those originally required to be planted, or in accordance with such other scheme as may be submitted to and approved in writing by the Planning Authority.

#### Reasons:-

- 1. In the interest of safeguarding the amenity of future residents.
- 2. In the interest of safeguarding the amenity of future residents.
- 3. In order to adequately protect the trees on site.

- 4. To ensure co-ordinated delivery of the development site.
- 5. To ensure a high level of amenity for future residents at the site.
- 6. In order to ensure the landscaping is established, to establish a robust green belt boundary at the site, and in the interests of the amenity of the site and wider area

#### **Informatives**

It should be noted that:

- 1. The development hereby permitted shall be commenced no later than the expiration of two years from the date of this consent or from the date of subsequent approval of matters specified in conditions, or three years from the date of planning permission in principle, whichever is the later.
- No development shall take place on the site until a 'Notice of Initiation of Development' has been submitted to the Council stating the intended date on which the development is to commence. Failure to do so constitutes a breach of planning control, under Section 123(1) of the Town and Country Planning (Scotland) Act 1997.
- 3. As soon as practicable upon the completion of the development of the site, as authorised in the associated grant of permission, a 'Notice of Completion of Development' must be given, in writing to the Council.

### **Financial impact**

#### 4.1 The financial impact has been assessed as follows:

There are no financial implications to the Council.

# Risk, Policy, compliance and governance impact

**5.1** Provided planning applications are determined in accordance with statutory legislation, the level of risk is low.

#### **Equalities** impact

#### 6.1 The equalities impact has been assessed as follows:

The application has been considered and has no impact in terms of equalities or human rights.

# Sustainability impact

#### 7.1 The sustainability impact has been assessed as follows:

This application meets the sustainability requirements of the Edinburgh Design Guidance.

# **Consultation and engagement**

#### 8.1 Pre-Application Process

Pre-application discussions took place on this application.

#### 8.2 Publicity summary of representations and Community Council comments

The application was advertised on 08 November 2019 and attracted 44 representations comprising 43 objections and one neutral comment. Cramond and Barnton Community Council submitted comments objecting to the proposal and Corstorphine Community Council submitted neutral comments raising various matters.

A full assessment of the representations can be found in the main report in the Assessment Section.

# **Background reading/external references**

- To view details of the application go to
- Planning and Building Standards online services
- Planning guidelines
- Conservation Area Character Appraisals
- Edinburgh Local Development Plan
- Scottish Planning Policy

**Statutory Development** 

Plan Provision The site forms part of Housing Proposal HSG19 in the

adopted Edinburgh Local Development Plan 2016. LDP item T17 Craigs Road Junction is also located within

the site's red line boundary.

**Date registered** 28 October 2019

**Drawing numbers/Scheme** 1, 2, 03B, 4-54, 55A, 56A, 57B, 58A-61A, 62-65, 66A,

67A,

68B, 69B, 70A, 71A, 72B, 73B, 74A, 75A, 76B, 77, 78B,

79,

80A, 81B, 82B, 83A, 84-86, 87B, 88A, 89A,

David R. Leslie
Chief Planning Officer
PLACE
The City of Edinburgh Council

Contact: Sean Fallon, Planning Officer

E-mail:sean.fallon@edinburgh.gov.uk Tel: 0131 469 3723

#### **Links - Policies**

#### **Relevant Policies:**

#### Relevant policies of the Local Development Plan.

LDP Policy Del 1 (Developer Contributions and Infrastructure Delivery) identifies the circumstances in which developer contributions will be required.

LDP Policy Des 1 (Design Quality and Context) sets general criteria for assessing design quality and requires an overall design concept to be demonstrated.

LDP Policy Des 2 (Co-ordinated Development) establishes a presumption against proposals which might compromise the effect development of adjacent land or the wider area.

LDP Policy Des 3 (Development Design - Incorporating and Enhancing Existing and Potential Features) supports development where it is demonstrated that existing and potential features have been incorporated into the design.

LDP Policy Des 4 (Development Design - Impact on Setting) sets criteria for assessing the impact of development design against its setting.

LDP Policy Des 5 (Development Design - Amenity) sets criteria for assessing amenity.

LDP Policy Des 6 (Sustainable Buildings) sets criteria for assessing the sustainability of new development.

LDP Policy Des 7 (Layout design) sets criteria for assessing layout design.

LDP Policy Des 8 (Public Realm and Landscape Design) sets criteria for assessing public realm and landscape design.

LDP Policy Des 9 (Urban Edge Development) sets criteria for assessing development on sites at the Green Belt boundary.

LDP Policy Env 8 (Protection of Important Remains) establishes a presumption against development that would adversely affect the site or setting of a Scheduled Ancient Monument or archaeological remains of national importance.

LDP Policy Env 9 (Development of Sites of Archaeological Significance) sets out the circumstances in which development affecting sites of known or suspected archaeological significance will be permitted.

LDP Policy Env 12 (Trees) sets out tree protection requirements for new development.

LDP Policy Env 16 (Species Protection) sets out species protection requirements for new development.

LDP Policy Env 21 (Flood Protection) sets criteria for assessing the impact of development on flood protection.

LDP Policy Env 22 (Pollution and Air, Water and Soil Quality) sets criteria for assessing the impact of development on air, water and soil quality.

LDP Policy Hou 1 (Housing Development) sets criteria for assessing the principle of housing proposals.

LDP Policy Hou 2 (Housing Mix) requires provision of a mix of house types and sizes in new housing developments to meet a range of housing needs.

LDP Policy Hou 3 (Private Green Space in Housing Development) sets out the requirements for the provision of private green space in housing development.

LDP Policy Hou 4 (Housing Density) sets out the factors to be taken into account in assessing density levels in new development.

LDP Policy Hou 6 (Affordable Housing) requires 25% affordable housing provision in residential development of twelve or more units.

LDP Policy Tra 1 (Location of Major Travel Generating Development) supports major development in the City Centre and sets criteria for assessing major travel generating development elsewhere.

LDP Policy Tra 2 (Private Car Parking) requires private car parking provision to comply with the parking levels set out in Council guidance, and sets criteria for assessing lower provision.

LDP Policy Tra 3 (Private Cycle Parking) requires cycle parking provision in accordance with standards set out in Council guidance.

LDP Policy Tra 4 (Design of Off-Street Car and Cycle Parking) sets criteria for assessing design of off-street car and cycle parking.

Open Space Strategy- The strategy helps to protect and develop the city's open spaces. It sets standards that will be expected to meet when making decisions on open spaces.

#### **Relevant Non-Statutory Guidelines**

**Non-Statutory guidelines** Edinburgh Design Guidance supports development of the highest design quality and that integrates well with the existing city. It sets out the Council's expectations for the design of new development, including buildings, parking, streets and landscape, in Edinburgh.

# Appendix 1

Application for Approval of Matters Specified in Conds 19/05051/AMC

at Land 195 Metres South Of West Craigs Cottage 85, Craigs Road, Edinburgh.

Application for approval of matters specified in conditions 1, 2, 3, 4 and 5 of planning permission 16/05681/PPP for erection of 250 residential dwellings (Scheme 2).

#### Consultations

#### **SEPA** comment

In our response to the PPP consultation we had no objection to this proposal (see our latest response of the 4 April 2018 (our ref: PCS/157945) and did not request any conditions. We therefore have no comments with regards to the discharge of these conditions. However please see below some general comments and regulatory requirements for the applicant.

#### General comments

In our previous response we noted that there was a surface hazard risk. Surface water management and drainage is primarily a matter for the Local Authority to determine and therefore we would advise to consider section 6 of guidance LUPS -GU09 to decide if further advice is required from SEPA. Should this be the case, we would ask you to reconsult us, making it very clear in the consultation letter that this is the reason for consultation.

We expect surface water from all developments to be treated by SUDS in line with Scottish Planning Policy (Paragraph 268) and, in developments of this scale, the requirements of the Water Environment Controlled Activities Regulations (CAR). SUDS help to protect water quality and reduce potential for flood risk. Guidance on the design and procedures for an effective drainage system can be found in Scotland's Water Assessment and Drainage Assessment Guide.

The proposed SUDS should accord with the SUDS Manual (C753) and the importance of preventing runoff from the site for the majority of small rainfall events (interception) is promoted. The applicant should use the Simple Index Approach (SIA) Tool to ensure the types of SUDS proposed are adequate.

Construction phase SUDS should be used on site to help minimise the risk of pollution to the water environment. Further detail with regards construction phase SUDS is contained in Chapter 31 of SUDS Manual (C753). By the time of construction the applicant will also need to apply for a construction site licence (CSL) under CAR for water management across the whole construction site (see details in the regulatory

requirement section below). It is recommended that the applicant have pre-application discussions with a member of the regulatory team in the local SEPA office if a site meets any of the criteria set out.

Comments should be requested from Scottish Water where the SUDS proposals would be adopted by them and, where appropriate, the views of your authority's roads department and flood prevention unit should be sought on the SUDS strategy in terms of water quantity and flooding issues.

Regulatory requirements for the applicant

Authorisation is required under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) to carry out engineering works in or in the vicinity of inland surface waters (other than groundwater) or wetlands. Inland water means all standing or flowing water on the surface of the land (e.g. rivers, lochs, canals, reservoirs).

Management of surplus peat or soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012. Consider if other environmental licences may be required for any installations or processes.

A Controlled Activities Regulations (CAR) construction site licence (CSL) will be required for management of surface water run-off from a construction site, including access tracks, which:

- o is more than 4 hectares.
- o is in excess of 5km, or
- o includes an area of more than 1 hectare or length of more than 500m on ground with a slope in excess of 25 degrees

See SEPA's Sector Specific Guidance: Construction Sites (WAT-SG-75) for details. Site design may be affected by pollution prevention requirements and hence we strongly encourage the applicant to engage in pre-CAR application discussions with a member of the regulatory services team in your local SEPA office.

#### Flood Prevention comment

The applicant has submitted a lot of information from previous applications 16/00837/PAN and 16/05681/PPP. I had tried to take consideration of this information while developing this response however there are still some items that need updated or further information/confirmation required as noted below.

1. As this is a greenfield site CEC Flood Prevention request that surface water attenuation structures are above ground and not below ground to allow for easier maintenance and identification of potential reduction in storage capacity or blockages. Consideration of the bird management requirements should be incorporated however through appropriate design the risk can be adequately mitigated.

- 2. The applicant should confirm how they proposed to reduce the volume of surface water that discharges from the site. At present the site is predominantly greenfield with "natural" soil conditions. Therefore runoff from the majority of smaller rainfall events would be lost through infiltration or evapotranspiration. With the site being developed and positively drained more of the runoff from more frequent small rainfall events will not be attenuated by the proposed surface water network. As a result an increased volume of surface water is being discharged from the site that can impact upon downstream flood risk and sustainability. The applicant should confirm how the overall discharge volume is being addressed and any arrangements for long term storage on the site.
- 3. As the northern section of the site's surface water drainage proposes to connect into the existing road drain on Maybury Road planning should ensure that the Locality Transport & Environment Manager for the North West locality is agreeable to the connection as part of this AMC application (i.e. before RCC stage).
- 4. The applicant should ensure that any in-curtilage SuDS features that are proposed across the development such as filter trenches or permeable paving are included within the site wide landscape plan and factoring arrangements. This is to ensure that residents are aware of their responsibilities (or the responsibilities of the factor, depending on the final agreement) to maintain the SuDS features on their properties for the protection of the water environment and reduce flood risk.
- 5. The applicant should confirm that the site is not at risk from flooding during the 1:200 (0.5% AEP) event plus 40% climate change, not just the 200+20% that is currently noted in the Drainage Statement. This is a requirement of the CEC self-certification process.
- 6. The Self Certification Certificate A1 covering the FRA and SWMP included in Appendix 3d of the RPS DIA for application 16/00837/PAN which is subsequently included in the Appendix C of the 19/05051/AMC Application SWMP is not current. The design submitted by Ironside Farrar includes different drainage arrangements than that proposed by the current 19/05051/AMC application. As a result, an updated certificate should be provided. I have attached blank templates for the applicant to provide an updated Certificate A1 signed by the current designer T Lawrie and Certificate B1 to be signed by a separate checking organisation (as this is classed as a major developed under planning) and drainage information checklist.
- 7. The calculations identify minor flooding from manhole S140. The applicant should identify through an overland flow path drawing where the flood waters will flow on site. This can be achieved by over-marking arrows to denote falls on the post-development arrangement. This should include runoff from outwith the site, from unpaved areas within the site, and from paved areas in events which exceed the capacity of the drainage system. The purpose of the drawing is twofold. Firstly to understand if there is any significant re-direction of surface flows to surrounding land and secondly to identify if surface water will flow towards property entrances.

#### Flood Prevention updated comment

I still have the following comments to be addressed by the applicant:

- 1. As this is a greenfield site CEC Flood Prevention request that the surface water management proposals are revised to reconsider above ground storage, despite the constraints noted in the applicant's response on 20/12/19.
- 2. As the northern section of the site's surface water drainage proposes to connect into the existing road drain on Maybury Road planning should ensure that the Locality Transport & Environment Manager for the North West locality is agreeable to the connection as part of this AMC application (i.e. before RCC stage).
- 3. The applicant should ensure that any in-curtilage SuDS features that are proposed across the development such as filter trenches or permeable paving are included within the site wide landscape plan and factoring arrangements. This is to ensure that residents are aware of their responsibilities (or the responsibilities of the factor, depending on the final agreement) to maintain the SuDS features on their properties for the protection of the water environment and reduce flood risk.
- 4. The applicant should confirm that the site is not at risk from flooding during the 1:200 (0.5% AEP) event plus 40% climate change, not just the 200+20% that is currently noted in the Drainage Statement. This is a requirement of the CEC self-certification process.
- 5. The Self Certification Certificate A1 covering the FRA and SWMP included in Appendix 3d of the RPS DIA for application 16/00837/PAN which is subsequently included in the Appendix C of the 19/05051/AMC Application SWMP is not current. The design submitted by Ironside Farrar includes different drainage arrangements than that proposed by the current 19/05051/AMC application. As a result, an updated certificate should be provided. I have attached blank templates for the applicant to provide an updated Certificate A1 signed by the current designer T Lawrie and Certificate B1 to be signed by a separate checking organisation (as this is classed as a major developed under planning) and drainage information checklist.
- 6. The calculations identify minor flooding from manhole S140. The applicant should identify through an overland flow path drawing where the flood waters will flow on site. This can be achieved by over-marking arrows to denote falls on the post-development arrangement. This should include runoff from outside of the site, from unpaved areas within the site, and from paved areas in events which exceed the capacity of the drainage system. The purpose of the drawing is twofold. First, to understand if there is any significant re-direction of surface flows to surrounding land. Second, to identify if surface water will flow towards property entrances.

#### Flood Prevention updated comment

I've reviewed the applicant's responses. The remaining comments are yet to be addressed:

- 1. As this is a greenfield site CEC Flood Prevention request that the surface water management proposals are revised to reconsider above ground storage, despite the constraints noted in the applicant's response. This should be considered by the CEC planners when collating consultation responses and determining the application.
- 2. Please identify existing and proposed ground level surface water flow paths on drawings. This can be achieved by taking the existing site survey and over-marking arrows to denote falls and then completing the same with the post-development arrangement. This should include runoff from outside of the site, from unpaved areas within the site, and from paved areas in events which exceed the capacity of the drainage system. The purpose of these drawings is twofold. First, to understand if there is any significant re-direction of surface flows to surrounding land. Second, to identify if surface water will flow towards property entrances.
- 3. The Self Certification Certificate A1 covering the FRA and SWMP included in Appendix 3d of the RPS DIA for application 16/00837/PAN which is subsequently included in the Appendix C of the 19/05051/AMC Application SWMP is not current. The design submitted by Ironside Farrar includes different drainage arrangements than that proposed by the current 19/05051/AMC application. As a result, an updated certificate should be provided. The applicant should provide an updated Certificate A1 signed by the current designer T Lawrie and Certificate B1 to be signed by a separate checking organisation (as this is classed as a major developed under planning).

#### Flood Prevention final comment

This application can proceed to determination without any further comments from CEC Flood Prevention.

CEC Flood Prevention do not generally support underground surface water attenuation tanks in greenfield development sites, although we appreciate the other constraints the applicant has to consider. CEC do not adopt underground attenuation tanks and recommend the applicant engage early with Scottish Water to ensure they agree to adopt and maintain the tanks.

#### **Corstorphine Community Council**

After circulation to the C.C. membership the matter was discussed at our scheduled meeting on Tuesday 19th. November.

The issues involved were duly noted especially in regard to road vehicle and footpath/cyclist exits onto Craigs and Maybury roads and the westward lying 16/04738/PPP development as concern has always been expressed concerning potential traffic density and management on adjacent roadwork networks given the scale of other local granted developments (HSG 20), likelihood of grant of 18/10028/PAN and forthcoming

International Business Gateway and 'Crosswind' development associated with Edinburgh Airport.

A relatively recent local issue has been impact on air quality.

#### Archaeology comment

The site is archaeological significance both in terms of potential buried remans dating back to early prehistory and surviving farm buildings. Therefore, this application must be considered under the terms of the above planning conditions and Scottish Government's Our Place in Time (OPIT), Scottish Planning Policy (SPP), Historic Environment Scotland's Policy Statement (HEPS) and CEC's Edinburgh Local Development Plan (2016).

Accordingly, several of the PPP conditions refer to and deal with archaeology and heritage matters. In terms of this application 19/05051/AMC, I would the following comments and recommendations

Condition 2vii) Archaeological mitigation strategy including a phased programme of archaeological investigation, the first phase of which will be undertaking of archaeological evaluation:

The archaeological evaluation was undertaken by AOC Archaeology Group in December 2019 as per their WSI (attached) submitted and agreed with this office. Due to the continuing business occupation the site of the steading and farm were not evaluated along with an a small are next to the farm due to active overhead cables. IT has agreed that these areas will be evaluated at alter date. Although the final evaluation report (DSR) has yet to be submitted, initial observations and discussions indicate that significant prehistoric remains (including a large palisaded enclosure) have survived across the southern half of the site.

As such I'm happy the condition 2vii has been met and discharged, as the results of this work will feed into and underpin the main archaeological works as covered by condition 8.

Condition 4: The masterplan and site layout submission, required by condition 01 above, shall also include for the retention and re-modelling of West Craigs farmhouse within the overall development of the site as a whole. These works must seek to conserve and re-build the stone garden walls to the farmhouse, re-using rubble derived from the demolition of the farm steading and existing stone walls to the access lane from Craigs Road.

I'm happy to recommend acceptance of the submitted feasibility study undertaken by EMA in support of this condition and to recommend that this condition can be discharged.

Please note that archaeological work in terms of building recording and excavation/reporting will be required to be undertaken at the Farmhouse. Such works will be subject to archaeological works undertaken in response to condition 7 & 8.

#### **Environmental Protection comment**

The applicant proposes discharging a number of conditions from the 2016 PPP consent. The conditions Environmental Protection have assessed concern noise and contaminated land.

The noise condition states, Condition 2 (vi) A full Noise Impact Assessment to protect residential properties from noise generated by the A902 Maybury Road to the east and industrial estate premises to the south west, and details implementing the required mitigation integrated.

The applicant has submitted a detailed noise impact assessment which has been assessed by Environmental Protection. The noise impact assessment has addressed all the points required and has highlighted that noise mitigation will be required in the form up upgraded glazing and acoustic barriers in order to protect future residential amenity from transport noise. The industrial noise was also assessed but not found to be of a level that would adversely impact future residential amenity.

The applicant has submitted site investigation reports which may satisfy condition 2 VII and will go towards discharging condition 10 in the future. Condition 10 is not subject to this AMC application. However, condition 10 cannot be discharged until validation and must remain.

Environmental Protection can concur with the noise impact assessment findings subject to the required noise mitigation measures being implemented in full. These should be conditioned;

- 1. To reduce the sound to 50dB(A) a 3m high acoustical barrier shall be constructed along the eastern edge of the gardens. Acoustic barriers shall also be constructed as highlight in the Charlie Fleming Report on Traffic and Commercial Sound (3375 07 R) dated 1 October as highlighted on Figure 4, and covers the following plots from drawing number 11491 / A / 02\_01 F, titled Development Layout, by Taylor Wimpey Plots 90, 91, 92, 93, 103, 113, 120, 124, 128, 129, 130, 131, 139, 140, 142, 143 and 144.
- 2. The acoustic barriers may be constructed of earth, rubble, brick or concrete blockwork, 25mm thick timber fencing with overlapping boards, or any combination of these materials.
- 3. To reduce the noise in the bedroom, the glazing in the window shall require a sound reduction index, for traffic noise, of at least 36dB. This can be achieved with glazing consisting of a minimum of 10mm and 8.8mm thick panes of laminated glass, separated by a 16mm wide cavity. This glazing shall be installed in all bedrooms with windows facing Maybury Road.

#### **Edinburgh Airport comment**

I can confirm that the following application meets our Safeguarding requirements:

19/05051/AMC (Taylor Wimpey site)

#### **Roads Authority Issues**

No objections to the application subject to the following being included as conditions or informatives as appropriate:

- 1. All accesses must be open for use by the public in terms of the statutory definition of 'road' and require to be the subject of applications for road construction consent See (see also note 9 below). The extent of adoptable roads, including footways, footpaths, accesses, cycle tracks, verges and service strips to be agreed. The applicant should note that this will include details of lighting, drainage, Sustainable Urban Drainage, materials, structures, layout, car and cycle parking numbers including location, design and specification. Particular attention must be paid to ensuring that refuse collection vehicles are able to service the site. The applicant is recommended to contact the Council's waste management team to agree details;
- 2. The applicant should note that the Council will not accept maintenance responsibility for underground water storage / attenuation;
- 3. In accordance with the Council's LTS Travplan3 policy, the applicant should consider developing a Travel Plan including provision of pedal cycles (inc. electric cycles), secure cycle parking, public transport travel passes, a Welcome Pack, a high-quality map of the neighbourhood (showing cycling, walking and public transport routes to key local facilities), timetables for local public transport;
- 4. The applicant should note that new road names will be required for the development and this should be discussed with the Council's Street Naming and Numbering Team at an early opportunity;
- 5. Any parking spaces adjacent to the carriageway will normally be expected to form part of any road construction consent. The applicant must be informed that any such proposed parking spaces cannot be allocated to individual properties, nor can they be the subject of sale or rent. The spaces will form part of the road and as such will be available to all road users. Private enforcement is illegal and only the Council as roads authority has the legal right to control on-street spaces, whether the road has been adopted or not. The developer is expected to make this clear to prospective residents as part of any sale of land or property;
- 6. All disabled persons parking places should comply with Disabled Persons Parking Places (Scotland) Act 2009. The Act places a duty on the local authority to promote proper use of parking places for disabled persons' vehicles. The applicant should therefore advise the Council if he wishes the bays to be enforced under this legislation. A contribution of £2,000 will be required to progress the necessary traffic order but this does not require to be included in any legal agreement. All disabled persons parking places must comply with Traffic Signs Regulations and General Directions 2016 regulations or British Standard 8300:2009 as approved;

- 7. Electric vehicle charging outlets should be considered for this development including dedicated parking spaces with charging facilities and ducting and infrastructure to allow electric vehicles to be readily accommodated in the future;
- 8. The developer must submit a maintenance schedule for the SUDS infrastructure for the approval of the Planning Authority.
- 9. The final layout of the Craigs Road / Maybury Road junction is subject to further approval at the Road Construction stage.
- 10. The car, cycle and motorcycle parking numbers and general layout meets the required guidelines and is acceptable to transport.

#### Note:

The application has been assessed under the 2017 parking standards and is in zone 3. These permit;

#### Car Parking

A maximum of 448 spaces

The developer has indicated that a maximum of 250 car parking spaces will be provided.

#### Cycle Parking

It is assumed that the individual houses will have in curtilage bike storage (187 units) For the flats, there are a total of 45 units comprising of the following; 3 rooms 45 units (minimum of 2 per unit) = 90 spaces

Total number of cycle spaces required = 90 no.

#### Motorcycle Parking

A minimum of 10 spaces.

Six secure motorcycle spaces are being provided within separate storage areas. The remaining four spaces can be provided on-street.

Note regarding Planning Permission in Principle application 16/05681/PPP for this site;

There were several transport obligations requested for this application in respected of;

- o Edinburgh Tram;
- o Junction improvements at Maybury, Craigs Road and Barnton;
- o Cycle-foot bridge over the railway to south of site;
- o Cycle improvements in the Gyle, Turnhouse Road and Maybury Road areas;
- o Various Traffic Regulation Orders;
- o Car Club;
- o Toucan crossing on Maybury Road.

It is understood that these were subject to a legal agreement as part of that application.

#### **Cramond+barnton Community Council comment**

#### Summary of Objections to Application

Cramond and Barnton Community Council (CBCC) objects to the proposed layout of the Craigs Road/Maybury Road Junction, as set out within the application. This objection relates specifically to the proposed junction layout and related requirements for the redetermination of Cammo Walk to enable closure to northbound vehicles.

CBCC's objection is based on feedback from the local community during public consultations on the Cammo Fields, current development and Maybury development proposals and discussions at CBCC's meeting on 21 November, 2019.

CBCC's objections will be maintained in respect of any TRO being sought to redetermine Cammo Walk solely for walking and cycling, unless alternative measures are taken to enhance the safety of southbound traffic from Cammo and Strathalmond, as outlined below.

#### Reasons for Objection

Around 440 households at Cammo and Strathalmond are reliant on vehicular access/ egress via the Cammo Gardens/Maybury Road and Cammo Road/Queensferry Road junctions and one-way, southbound route along Cammo Walk to Maybury Road, for access to the City-wide road network.

Redetermination of Cammo Walk to remove vehicular traffic, would result in reliance on access/egress solely by the following two junctions, both of which are extremely hazardous for vehicular traffic -

Cammo Gardens/Maybury Road junction - this junction is hazardous, especially for vehicles entering Cammo Gardens from the southbound lane on Maybury Road and, in particular, when queuing traffic in the outside northbound lane obscures traffic travelling on the inside lane, as frequently occurs both during and outwith peak periods. It is even more hazardous for traffic leaving Cammo Gardens and crossing the northbound lanes to travel southwards on Maybury Road, as queuing traffic frequently obscures southbound Maybury Road traffic and traffic turning into Cammo Gardens from Maybury Road.

Members of the community are aware of, and some have experienced, near fatal accidents at this junction. A substantial proportion of residents refuse to use this junction to access southbound lanes on Maybury Road, due to the perceived risks and Cammo Walk is the only route they will use to access Maybury Road for travel southwards towards Corstorphine, the Gyle, City Bypass, M8, etc.. Members of the Council's Roads staff have acknowledged the substantial hazards at this junction.

Cammo Road/Queensferry Road junction - due to traffic speeds on Queensferry Road and very limited sightlines of traffic travelling towards Cramond Bridge, turning into Cammo Road from the westbound lanes of Queensferry Road and especially turning out of Cammo Road across the westbound lanes of traffic to travel eastward involve extremely hazardous traffic movements. A senior member of Roads staff has previously suggested that consideration should be given to stopping up the eastward turn out of Cammo Road, due to the safety hazards.

Due to the above circumstances, a significant proportion of Cammo and Strathalmond residents, especially less confident/less able drivers, would effectively be prevented from travelling directly southwards from their homes and be 'landlocked' by the removal of southbound traffic from Cammo Walk, without changes to the Cammo Gardens/Maybury Road junction, as outlined below.

It is of concern to our communities, also, that the perceived undue bias in decision-making on roads issues in favour of representations from the Active Travel Team over the often ignored, underweighted and unaddressed safety issues is improper and could leave officials legally liable in the event of a serious/fatal accident when the community's many representations and warnings have been ignored.

Lack of Clarification and Meaningful Engagement on Proposals for Cammo Walk

Our Community Council has highlighted concerns over potential closure of Cammo Walk at all stages of preparation of LDP1 and in discussions with Planning and Roads staff in respect of the Cammo (HSG20) and Maybury (HSG19) proposals, but -

- o has been informed that no decision on the future status of Cammo Walk has been made (see Ben Wilson's e-mail of 22 November 2019 to Councillor Hutchison)
- o has been told by Active Travel staff that Cammo Walk is to be closed
- o found that draft designs for realigning the Craigs Road/ Maybury Road junction are at an advanced stage, but no opportunities have been available for community input.

These mixed messages are unacceptable and the lack of positive consultation on this matter is contrary to the principles within the Edinburgh Planning Concordat.

Means of Overcoming the Community's Objections

In seeking meaningful resolution of the community's concerns and objections to the potential closure of Cammo Walk to vehicular traffic, representatives of the Community Council have put forward positive proposals to Planning and Roads staff. Including -

Maintaining Cammo Walk as a southbound vehicular traffic route, and either -

- o providing a walking/cycling route on a separate, possibly parallel, alignment
- o undertaking minor realignment and widening of Cammo Walk to provide a segregated walking/cycling route alongside a low speed (e.g. 15mph) southbound traffic route.

Installing traffic lights at the Cammo Gardens/Maybury Road junction in advance of any redetermination of Cammo Walk to provide a green corridor for walking and cycling. This approach would provide the c.440 households of Cammo and Strathalmond with enhanced safety for traffic movements into and out of their communities. There is a distinct lack of equity when the approved 650 houses at Cammo (HSG20) are to be served by two sets of traffic lights at vehicular junctions and 2 separate sets of lights-controlled pedestrian/cyclist crossings. In addition, the Community Council has received strong representations seeking the installation of traffic lights at the Cammo Road/Queensferry Road junction.

#### **Waste Services comment**

As this is to be a residential development, Waste and Cleansing would be expected to be the service provider for the collection of domestic waste (only).

We understand there are a total of 250 units, including 5 blocks of flats which have 9 units each. The flats will be served by a full range of communal bins, from suitably accessible bin stores. The houses will have individual bins, which will either be presented kerbside or in collection areas which are adjacent to kerbs. Appropriate vehicle access has been demonstrated. Therefore, I can confirm that the information provided is acceptable under Instructions For Architects Guidance.

Please note that the detailed arrangements regarding the provision of waste collection services must be agreed at later stage, particularly as due to changes within the service over the next three years, the bin requirements will change, and you should review these with us prior to starting work. We can then agree a waste strategy, which would then be confirmed at completion with an inspection to confirm that all criteria are met.

Therefore, I would ask that Douglas Duffy is contacted a minimum of 12 weeks prior to any waste collections being required, to allow for the necessary work to be completed to commence waste collections, ahead of residents moving in.

A site visit will be conducted to ensure that all has been constructed in line with our agreement. Any waste produced on site by the residents will be the responsibility of the developer/builder until the final inspection is accepted and waste collections are in place.

#### **Affordable Housing comment**

#### 1. Introduction

I refer to the consultation request from the Planning Department about this planning application.

Housing Management and Development are the statutory consultee for Affordable Housing. Housing provision is assessed to ensure it meets the requirements of the city's Affordable Housing Policy (AHP).

- Policy Hou 6 Affordable Housing in the Edinburgh Local Development Plan states that planning permission for residential development, including conversions, consisting of 12 or more units should include provision for affordable housing.
- o 25% of the total number of units proposed should be affordable housing.
- o The Council has published Affordable Housing Guidance which sets out the requirements of the AHP, and the guidance can be downloaded here:

https://www.edinburgh.gov.uk/affordable-homes/affordable-housing-policy/1

2. Affordable Housing Provision

This application is for a development consisting of up to 250 homes and as such the AHP will apply. There will be an AHP requirement for a minimum of 25% (63) homes of approved affordable tenures. The tenure of the affordable housing must be agreed by the Council.

The applicant has stated that the affordable housing will account for 63 homes (25% of the new homes) and will consist of flatted apartments and terraced houses.

The affordable homes are required to be tenure blind and fully compliant with latest building regulations. The design of affordable housing should be informed by guidance such as Housing for Varying Needs and the relevant Housing Association Design Guides and we require that applicants work with the Council and RSL's to achieve this.

The affordable homes should be situated within close proximity of regular public transport links and next to local amenities. An equitable and fair share of parking for affordable housing, consistent with the relevant parking guidance, should be provided.

The applicant has entered into dialogue with the Council regarding the mix and location(s) of the affordable housing, and identification of a Registered Social Landlord (RSL). The Housing Service has sought that an integrated and representative mix of affordable housing should be delivered on site.

Significant negotiation has taken place with the applicant, with the details of the mix and location of the affordable housing changing several times. Our main concerns with this being:

- o The proportion of Golden Share low cost home ownership housing proposed, and;
- o The location of the affordable housing, and;
- o The representative mix of affordable housing.

Some, but not all, of these concerns have been addressed.

#### Golden Share

Golden Share homes are sold at 80% of market value and must be less than £214,000 per home. Initially, the applicant set out a ratio of 70% of the affordable homes as RSL homes and 30% of the affordable homes as Golden Share low cost home ownership. After negotiation, this was reduced to 25% Golden Share (or 16 homes), and an increase in RSL affordable housing to 75% of the overall affordable provision.

Affordable Housing Policy Guidance sets out that Golden Share properties should not exceed 20% of the overall affordable housing provision, or 12 units, whichever is the lesser. However, the applicant's original PPP application was granted before the Affordable Housing guidance was updated (in February 2019), and as they have entered into a Section 75 Legal Agreement and were able to propose a higher proportion of RSL housing, we believe the percentage of Golden Share properties could be supported.

#### Location of Affordable Housing

The location of the affordable housing was initially only within the southern part of the site. Negotiation with the applicant has resulted in three homes now being provided in

the northern site. The applicant has 'pepper potted' the Golden Share units across the site, although the majority are located in the south.

#### Representative Mix

The applicant has set out a proposed mix of the sizes and types of market housing and affordable housing being provided across the site:

The applicant has amended the overall mix to include more three bedroom properties which the RSL would provide as affordable housing. This department has raised concerns about the above mix with the applicant and more three bed properties have been requested.

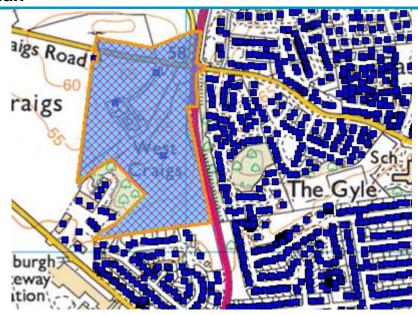
A letter of support from an RSL has been provided in regards to the affordable housing. They are supportive of the proposed scheme which would deliver 25% affordable housing on site and deliver 39 two bedroom homes and 8 three bedroom homes, which the RSL would own and manage. The applicant has described these homes as social rent but has not entered into contract with the RSL and was not able to confirm that the homes would be sold to the RSL at price that would enable social rent. The tenure of the affordable housing is required to be agreed by the Council as set out in the Section 75 Legal Agreement.

#### 3. Summary

The applicant has made a commitment to provide 25% on site affordable housing and this will be secured by a Section 75 Legal Agreement. This approach which will assist in the delivery of a mixed sustainable community:

- o The applicant has entered into dialogue with the Council and has identified a Registered Social Landlord (RSL) to deliver the affordable housing on site.
- o The applicant has made provision for 75% of the affordable housing to be delivered by a RSL.
- o Whilst the affordable housing includes a variety of house types and sizes of homes across the wider site, the mix falls short of being representative.
- o In the interests of delivering mixed, sustainable communities, the affordable housing policy units are expected to be identical in appearance to the market housing units, an approach often described as "tenure blind".
- o The affordable homes should be designed and built to the RSL design standards and requirements.
- o The applicant will be required to meet the conditions of the Section 75 legal agreement to secure the affordable housing element of this proposal.

## **Location Plan**



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Appendix 7	Report to Education Children and Families	Committoo	3 3 20	(School	Pall
Appendix 7	Projections and Rising School Rolls)	Committee	3.3.20	(School	KUII

# **Education, Children and Families Committee**

## 10am, Tuesday, 3 March 2020

## **School Roll Projections and Rising School Rolls**

Executive/routine
Wards
Council Commitments

#### 1. Recommendations

- 1.1 The Education, Children and Families Committee is asked to:
  - 1.1.1 Note the contents of the report;
  - 1.1.2 Agree that the Council website will be updated with the projections included in the appendices.

#### **Alistair Gaw**

**Executive Director for Communities and Families** 

Contact: Robbie Crockatt, Learning Estate Planning Manager

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# Report

## School Roll Projections and Rising School Rolls

## 2. Executive Summary

- 2.1 This report provides an update on the progress made in taking forward the actions and implications arising from the publication of School Roll Projections in December 2019. The actions included investigation of schools with projections showing significant accommodation pressures. Investigation of the figures for Buckstone and Boroughmuir identified an anomaly that cause both school's projections to be overstated. Revised projections that make adjustments to counter this anomaly are included as Appendices 1 and 2.
- 2.2 In addition to the update on those schools identified in December 2019 as requiring investigation or the establishment of a Working Group, this paper provides an update on all 'live' Learning Estate Primary and Secondary School infrastructure projects being undertaken to address Rising Rolls or developments arising from the Local Development Plan.

## 3. Background

3.1 Background information can be found in the "School Roll Projections and Rising Rolls", "Future Statutory Consultation Requirements" and "The Growing City, School Roll Projections and Future Accommodation Requirements" reports considered by the Education Children and Families Committee in December 2019, May 2019 and December 2018 respectively.

## 4. Main report

#### **School Roll Projections**

- 4.1 In December 2019 the Education, Children and Families Committee considered the "School Roll Projections and Rising Rolls" paper which included the annual publication of the latest school roll projections covering the period from 2019-2029.
- 4.2 The projections continue to show that despite a falling birth rate, over the next ten years the overall primary school roll at city level is estimated to grow slightly while the secondary school roll is projected to rise sharply as the rising rolls experienced by primary schools in recent years move into that sector.

- 4.3 The new projections included categorisation of schools into one of four categories of action:
  - 4.3.1 No Action Required
  - 4.3.2 Monitoring
  - 4.3.3 Investigation
  - 4.3.4 Working Group
- 4.4 The "School Roll Projections and Rising Rolls" paper recommended that where investigative work or the establishment of a Working Group is required, a Rising Rolls update report will be provided to Committee in March 2020 outlining the conclusions reached and/or progress made.
- 4.5 Accordingly, this paper provides an update on the status of schools identified as requiring investigative work or requiring the establishment of a working group. This paper will also provide updates on other, 'live' or in progress Rising Rolls projects.

#### Schools Identified as Requiring a Working Group

4.6 The 2019 School Roll Projections identified 3 schools as requiring a Working Group. A Rising Rolls Working Group typically consists of Council officers, members of the school's management team and representatives from the school's parent Council. The following table identifies the school's where Rising Rolls Working Groups are required or have been formed and the latest status:

School	Why Form Working Group	Progress
Craigroyston High School	The capacity at Craigroyston High School is 600 pupils. Projections show that the school will increase annually over the next 10 years to a roll of approximately 800 pupils.	Initial conversations with School Management to identify likely pressure points are in progress. The first Working Group meeting will take place prior to Easter 2020. The latest S1 intake data from January 2020 suggests that an intake of 160 will be required – far exceeding the projected intake (120) for this year and the optimum intake limit for the school (120). Solutions to address this continuing growth will be required.
Firhill High School	The capacity at Firhill High School is 1,150 pupils. The roll in 2019 exceeded 1,200 pupils. Projections suggest that while it will not increase, the school will maintain this high level over the next 10 years.	Initial conversations with School Management have taken place and the first Working Group meetings are being scheduled. The latest S1 registration data from January 2020 (208 S1 pupils) is in line with projections (206 S1 pupils). However, should future S1 intakes rise beyond those projected the high starting roll could cause issues. Accordingly, actions to address unexpected increases should be identified.

Gracemount High	The capacity at	The working group will consider options
Oracomount riigh	' '	
School	Gracemount High School	to provide extra capacity for
	is 650 pupils. Projections	Gracemount High School. This will be
	show that the school will	considered alongside other required
	increase annually over the	investment including Early Years and St
	next 10 years to a roll of	Catherine's RC Primary School.
	approximately 830 pupils.	

#### Schools Identified as Requiring Investigative Work

4.7 If a projection suggests accommodation pressures in the next few years of a magnitude that would cause significant concern and there are no mitigating measures already proposed, the detail of the projection will be investigated to determine whether the methodology used is appropriate for that particular school or there are circumstances not captured by the existing methodology that need to be considered. The following table identifies the school's where Investigative Work has been suggested and the conclusions:

School	Why Investigate	Conclusions / Recommendations
Buckstone Primary School	School capacity is 462 pupils and the roll in 2019 was 431 pupils. Projections suggest that the roll in August 2020 will increase to 502 pupils and then rise in August 2021 to 551 pupils.	The number of P1 pupils projected in 2020 is skewed by a spike in birth rate which has affected the P1/births ratio.  The projected P1 was 125 pupils but the early P1 registration data is in line with the capacity of the school.  Updated primary and secondary projections are provided in Appendices 1 and 2 respectively.  No actions are required.
Bun-sgoil Taobh na Pairce	School capacity is 462 pupils and the roll in 2019 was 424 pupils. Projections suggest that the roll will grow to 500 pupils by 2023.	Projecting GME uptake is difficult. However, the projected P1 intake for August 2020 is 74 pupils. As of January 2020 there were 69 registrations and 9 requests in from out of authority. Previous experience suggests that this will drop rather than increase which suggests that this year's projection is likely to be reasonably accurate if not a little high.  It is recommended that this intake be monitored.
Forthview Primary School	School capacity is 434 pupils and the roll in 2019 was 412 pupils. Projections suggest that	Projections suggest the P1 intake in August 2020 would be 66 pupils.  The number of P1 pupils actually registered in January 2020 was 62.

	the roll will grow to 440 pupils by 2022.	Previous experience suggests that this will drop before August 2020 and an intake of less than 60 is likely. Accordingly, no immediate pressures are anticipated.  No actions are required.
Nether Currie Primary School	School capacity is 210 pupils and the roll in 2019 was 175 pupils. Projections suggest that the roll will grow to 300 pupils after 10 years.	The projected P1 intake for August 2020 is 25 pupils. As of January 2020 there were 24 registrations.  Families moving into existing housing stock within the Nether Currie catchment in the last five years has led to P1 levels being almost double the birth rate. This has created a very high birth-to-P1 factor when compared to the wider city. This factor has been applied to the births in the new larger catchment area which in turn may have created artificially high P1 projections.  It is recommended that this intake be
St Francis RC Primary School	School capacity is 315 pupils and the roll in 2019 was 264 pupils. Projections suggest that the roll will grow to 359 pupils by 2027.	monitored.  The ability to prioritise baptised RC pupils means that there are greater controls available where RC schools are concerned. The number of P1 registrations for August 2020 is consistent with the capacity of the school.  It is recommended that this intake be monitored.
Balerno High School	School capacity is 850 pupils and the roll in 2019 was 752 pupils. Projections suggest that the roll will grow to 1091 pupils over the next 10 years.	The 2019 projection for Balerno High School is nearly 200 pupils higher than the 2018 projections. It is expected that out of catchment places will fill the S1 to its 160 capacity until 2023. Beyond 2023 the number of catchment pupils retained will exceed 160 pupils.  In the longer term Balerno is part of the WAVE4 programme.  It is recommended that this intake be monitored.
Boroughmuir High School	School capacity is 1,150 pupils and the roll in 2019 was 1,310 pupils. An extension to the school building will increase the capacity to 1,560 pupils from August 2021.  Projections suggest that	The Boroughmuir projections for 2018 & 2019 follow a similar trajectory until 2026 where the 2019 projections continue to increase while the 2018 projections start to plateau.  This is principally due to the skewed data from the Buckstone Primary School projection (see above). Updated

the roll will grow to 1,766 pupils by 2029 – approximately 100 pupils higher than the 2018 projections.

primary and secondary projections are provided in Appendices 1 and 2 respectively.

The intakes and roll at Boroughmuir will be closely monitored. If the extension proves, in the long-term, to be insufficient to accommodate catchment demand then catchment change will be required. There is no scope to extend Boroughmuir High School further.

Should catchment change ultimately be required, proposals would be developed to take account of CityPlan 2030 as part of the Council's Education Appraisal. Until such time as an Education Appraisal has been completed it is not possible to identify how a catchment change would impact on existing catchment arrangements.

#### **Live Projects**

- 4.8 There are a number of schools listed in the projections published in December 2019 that are listed as being 'Live' projects. The following section provides a summary of the latest status and progress of these projects:
  - Castleview Primary School
- 4.9 The Local Development Plan identifies a requirements for 3 additional classroom spaces and a dining hall extension to meet projected demand for places from pupils generated by the significant amount of new housing in the area.
- 4.10 A desktop study and a visit to the school to assess requirements by Learning Estate Planning Officers, together with the latest P1 registration data suggests that the requirement for this is not imminent. Accordingly, the position will continue to be monitored with the appropriate solution identified and progressed at the appropriate time.
  - Corstorphine, Cramond and Hillwood Primary Schools
- 4.11 Corstorphine, Cramond and Hillwood Primary Schools continue to show significant growth in later years due to the Maybury and Cammo developments which are located within their catchment areas. However; a statutory consultation proposing the establishment of a new Maybury Primary School with a catchment area incorporating sections of the Corstorphine, Cramond and Hillwood Primary School catchments has been undertaken. Should this proposal progress to delivery, the accommodation pressures indicated by projections at Corstorphine, Cramond and Hillwood Primary Schools would disappear. The recommended outcomes of this

consultation will be considered by full Council at its meeting on Thursday 12 March 2020.

Deanpark Primary School

- 4.12 Following the Council's approval in March 2019 of the recommendation arising from the statutory consultation proposing to realign the catchment areas of Currie Primary School, Nether Currie Primary School, Dean Park Primary School, Currie High School and Balerno High School, work has begun to identify how Deanpark Primary School can best be extended.
- 4.13 A working group consisting of officers from the Council's Learning Estate Planning Team, school management and parent representatives met with an architect in mid-December 2019 to consider a number of options allowing the delivery of additional classroom space by August 2021.
- 4.14 Following feedback from the working group the architect has progressed the development of several of these options and these will be the subject of further Working Group discussions in February 2020. Consultation with the wider parent forum and community will be undertaken once the option(s) to be progressed have been refined.

Echline and Queensferry Primary Schools

- 4.15 The roll projections for Echline and Queensferry Primary Schools show that both schools will exceed their capacity as a result of pupils generated from the high number of significant housing developments within their catchment areas.
- 4.16 The most significant of these is the Builyeon Road development which is located within Echline's catchment area. A statutory consultation proposing the establishment of a new Builyeon Road Primary School will be progressed once a masterplan for the new development becomes available.
- 4.17 A statutory consultation proposing the realignment of the catchment areas of Queensferry Primary School and Echline Primary School concluded in November 2019. Should this proposal progress it would ease pressure on Queensferry Primary School, which is currently under pressure from new housing in the Scotstoun area, and require that Echline Primary School be extended from 12 to 14 classes. The recommended outcomes of this consultation will be considered by full Council at its meeting on Thursday 12 March 2020.
- 4.18 Should additional classrooms at Echline be recommended and approved, the intention would be to combine the requirement for the new classrooms with expansion of Early Years provision at Echline Primary. This will drive efficiencies and allow a more holistic approach to the design development.
  - Fox Covert Primary School and St Andrew's Fox Covert RC Primary School
- 4.19 Rising rolls at Fox Covert Primary School have previously required the construction of a 4 classroom extension, completed in August 2017. As part of this development a second phase was planned allowing the delivery of a further 2 classrooms at a later date.

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- 4.20 This phase 1 extension is now full. While the roll at Fox Covert has now stabilised, projections continue to show some growth. Additionally, the LDP identifies a requirement for additional classroom space at the adjoining St Andrew's Fox Covert RC Primary to support demand for Roman Catholic places from the Maybury and Cammo housing developments.
- 4.21 Work on the phase 2 extension will begin in March 2020 and complete in August 2020.
  - Gilmerton and Gracemount Primary Schools
- 4.22 Projections for Gilmerton and Gracemount Primary Schools continue to show considerable growth. However, the completion of the new Broomhills Primary School in August 2020 which incorporates sections of the catchment areas of both Gracemount and Gilmerton is expected to allow much of this projected demand to be met. In the longer term the provision of a new school as part of the Gilmerton Station Road developments will provide greater flexibility in the area and take pressure off Gilmerton Primary School.
  - Granton Primary School
- 4.23 Projections for Granton Primary School show growth beyond 21 classes from August 2025. The school is currently a 20-class capacity. A new primary school will be required to support the Granton Waterfront development and it is anticipated that the catchment area of this new school will incorporate some of the existing Granton Primary School catchment.
- 4.24 In the short-term, the completion of the new nursery in the grounds of Granton Primary School for August 2020 will also allow the relocation of Early Years services from the main school building providing additional classroom space.
  - Kirkliston Primary School
- 4.25 A consultation proposing the establishment of a P1 and P2 annexe of Kirkliston Primary School at Kirkliston Leisure Centre has been undertaken. The recommendations arising from this consultation will be considered by the Council at its meeting on 30 April 2020. Should the consultation proposal be progressed, this would increase the capacity of Kirkliston Primary School to allow projected demand to be accommodated.
- 4.26 Should the proposals set out in the consultation paper not progress, the 4 classroom temporary unit delivered in August 2019 has been designed so that a further 4 classrooms could be provided as an upper level.
  - Newcraighall Primary School
- 4.27 The New Brunstane housing development is within the catchment area of Newcraighall Primary School. Estimated pupil generation from this development has pushed the school roll projection for Newcraighall Primary School beyond the school's available capacity. Accordingly, a statutory consultation proposing the relocation of Newcraighall Primary School to a new, larger site and building within the new development has been undertaken. The recommended outcomes of this

consultation will be considered by full Council at its meeting on Thursday 12 March 2020.

Ratho Primary School

- 4.28 In December 2018 "The Growing City, School Roll Projections and Future Accommodation Requirements" report to the Education, Children and Families Committee identified Ratho Primary School as requiring expansion. Officers considered the options available to extend the school and concluded that the option that offered best value; was most appropriate for education; that met the Council's requirement to limit its carbon footprint and that made best use of existing capacity, was to repurpose the adjoining Community Centre for both school and community use. This proposal would be made possible due to the existing lack of timetabled activity at the Community Centre during the school day and the provision of a Community space as part of a new Early Years and library development on the same site.
- 4.29 However, while the latest projections continue to show a requirement for expansion, the number of pupils registered for P1 in August 2020 (as of January 2020) is lower than projected. With two P7 classes leaving at the end of the 2020/21 session there will also be sufficient capacity for a high P1 intake in August 2021. This means that the school will be in a position to accommodate required demand until at least August 2022 which is therefore the earliest that creation of additional capacity through use of the Community Centre would now have to be delivered. The situation will therefore continue to be kept under review including the future use of the existing nursery which will, following the opening of the new nursery in August 2021, be surplus to requirements.
- 4.30 While the school should have the classroom space to accommodate intakes in the next two years, the school does lack General Purpose (GP) space. The Scottish Government recommendation for a school of 11 classes is 2 GP rooms and Ratho Primary School only has one. The school does benefit from some good breakout space but it is recommended that from now on, the regular use of existing spaces within the adjoining Community Centre, including the games hall, be timetabled in coordination with the Community Centre's Management Committee.
- 4.31 This may require that storage of, for example music equipment, art or cooking supplies be accommodated on a more permanent basis within the Community Centre. Supplementing school space with the space available during the day in the Community Centre should provide the school with a good level of general-purpose provision.
  - South Morningside Primary School
- 4.32 While the projections for South Morningside Primary School continue to show that the school will face accommodation pressures, the projections do not take account of the catchment changes that will take place following the completion of the new Canaan Lane Primary School in August 2021. The new school will ensure there is sufficient capacity in the local area.

- St Catherine's RC Primary School
- 4.33 Work has begun on the redesign of St Catherine's RC Primary School which will be rebuilt following the findings that it would no longer be economically prudent to continue investing in the fabric of the existing building. An initial engagement meeting with St Catherine's RC Primary School parents took place in January to let them know that an architect has been commissioned to produce a masterplan for the design that takes account of the feedback received during the "My Gracemount" consultation in 2019.
- 4.34 Further engagement with parents from St Catherine's RC Primary School, with neighbouring schools and with the wider community will take place following the conclusion of the master planning work being undertaken.
  - St David's RC Primary School
- 4.35 Rising rolls at St David's RC Primary School have previously required the construction of a 4 classroom extension, completed in August 2015. As part of this development a second phase was planned allowing the delivery of further classrooms at a later date.
- 4.36 While there is capacity to accommodate it's P1 intake in August 2020 without an extension the roll at the school has continued to grow. In addition, the LDP identifies a requirement for additional classroom space at the adjoining St Andrew's Fox Covert RC Primary to support demand for Roman Catholic places from the Maybury and Cammo housing developments.
- 4.37 Accordingly, design development work on the phase 2 extension has begun and the extension will be scheduled for delivery in August 2021.
  - St John Vianney RC Primary School
- 4.38 Projections for St John Vianney RC Primary School show growth beyond its 11 class capacity from August 2021. The Local Development Plan identifies a requirement to extend RC provision within this area of the city, with a 2 classroom extension identified for St John Vianney RC Primary. This expansion will take place from August 2020 through the relocation of nursery classes to a new Early Years Centre on the school site.
- 4.39 The vacant classrooms will be refurbished following completion of the school's award winning Future School's design which is being lead by a project management team from P5.
  - Victoria Primary School
- 4.40 Growth from the Wester Harbour developments has increased pressure on Victoria Primary School with classes now accommodated in a Rising Rolls building and temporary units. Accordingly, a replacement school building is currently under construction on a site in the Western Harbour and is due to complete in Easter 2021.

- Boroughmuir High School
- 4.41 Works on the extension of Boroughmuir High School will begin in June 2020 and complete 12 months later. Further details of the requirement are in section 4.7 of this paper.
  - Castlebrae High School
- 4.49 The replacement Castlebrae High School is due to open in August 2021.

  \*\*Craigmount High School\*\*
- 4.43 Craigmount High School shows significant growth in later years due to the Maybury development which being located within its catchment area. A statutory consultation proposing the establishment of a new Maybury Primary School would, if approved, align the new Maybury Primary School with Craigmount High School.
- 4.44 Proposals for the development of a new West Edinburgh/Kirkliston High School, (which depending on its location could ultimately be the cluster secondary school for the new Maybury Primary School), will be considered as part of the City Plan 2030 Choices consultation. In the meantime, it is necessary to develop an expansion strategy for Craigmount High School which, if the West Edinburgh High School option cannot be delivered in a suitable location, will be required to expand from is current 1,400 pupil capacity to around 1,800 pupils. Accordingly, a feasibility study will be commissioned and a Working Group established.
  - James Gillespie's High School
- 4.45 The projections for James Gillespie's High School demonstrate that it no longer has the capacity to support a growing Gaelic Medium intake. In previous years the number of pupils transferring from primary to secondary Gaelic Medium Education were low, however, with the establishment of Bun Sgoil Taobh na Pairce, James Gillespie's High School has gained an additional feeder primary school.
- 4.46 Design work is underway to develop proposals for the accommodation at Darroch, which was used as an annexe of James Gillespie's High School when the new school building was being constructed. The use of this building by Gaelic Medium pupils will provide an immersive environment and take pressure of facilities on the main James Gillespie's High School site.
- 4.47 In the long-term, proposals are being developed to create a dedicated Gaelic Medium secondary school. The realignment of GME pupils with a new GME school will significantly reduce the pressure on James Gillespie's High School.
  - Liberton High School
- 4.48 Liberton High School is a part of the WAVE4 programme and requires to be replaced. A detailed design process will begin in February 2020 should funding be allocated through the Council's budget processes.
- 4.49 In the short-term, the Rising Rolls at Liberton High School will be met through the provision of modular accommodation. Six new classrooms will be delivered for August 2020 to provide capacity for the 2020/21 session.

4.50 The December 2020 projections forecast 205 catchment pupils for August 2020 and registrations as of January 2020 stand at 200. However, the final projected S1 intake of 160 may be lower than the actual intake if a greater percentage of pupils choose to remain at their catchment school or are unsuccessful in gaining places elsewhere.

Portobello High School

4.50 Minor works are currently under way to reconfigure some classroom spaces. This will provide sufficient capacity to address the rising rolls.

Queensferry Community High School

- 4.52 The new Queensferry Community High School is scheduled to open in March 2020. The school includes within its projections the development site at Builyeon Road which will be served by a new primary school.
- 4.53 Queensferry's catchment area also includes Kirkliston. Queensferry's capacity cannot support both Kirkliston and a developing Builyeon Road Primary School. A solution is required to provide Kirkliston with a permanent and sustainable conclusion of the City Plan 2030 Choices consultation when the location for additional secondary provision can be finalised.

The Royal High School

- 4.54 Plans are being progressed for an extension of The Royal High School which will allow it to accommodate projected demand. The new extension is programmed for delivery in August 2021. However, the school faces immediate accommodation pressures with the S1 intake for August 2020 being higher than the capacity of the existing accommodation can sustain. To address this, plans have been developed to undertake works during the summer which will provide the school with additional Science labs.
- 4.55 Dining is a significant issue for the school with the present small dining facility struggling to accommodate growing demand. Accordingly, Council officers are working with the school management team to identify possible short and medium term solutions. In the long-term, a feasibility study has been commissioned to explore how the dining room could be physically extended into an adjacent internal courtyard.

Trinity Academy

4.56 Trinity Academy is part of the WAVE4 programme. Funding has been provided to allow the construction of new PE facilities for the school on the Bangholm playing fields site. This will allow the demolition of some existing facilities on the main site to facilitate the development of a second phase of accommodation provision. The scope and brief for this second, more extensive phase of works is in development with involvement of school management and a Parent Working group. Detailed wider public consultation will follow as plans develop.

#### 5. Next Steps

5.1 To follow.

## 6. Financial Impact

- 6.1 This report provides a status update and does not in itself make recommendations that have a direct financial consequence for the Council.
- Any new infrastructure project requires a business case, including details of the capital and revenue financial implications, to be submitted to the Asset Management Board before being considered by the Council as part of an appropriate budget setting process.

### 7. Stakeholder and Community Impact

- 7.1 Where necessary Working Groups consisting of Learning Estate Planning Officers, School Management and Parent Representatives will be formed to consider the right solution for the accommodation pressures the projections may suggest.
- 7.2 Where required any statutory consultations will be conducted in line with the procedures set out in the Schools (Consultation) (Scotland) Act 2010 as amended by the Children and Young People (Scotland) Act 2014.

## 8. Background reading/external references

- 8.1 <u>Education, Children and Families Committee, 18 December 2018: "The Growing</u> City, School Roll Projections and Future Accommodation Requirements"
- 8.2 Education, Children and Families Committee, 21 May 2019: "Future Statutory Consultation Requirements"

## 9. Appendices

- 9.1 Appendix 1 Primary School Roll Projections 2019-2029
- 9.2 Appendix 2 Secondary School Roll Projections 2019-2029

**Primary School Roll Projections 2019-2029** 

School	Capacity	Classes	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
Abbeyhill Primary School	231	9	162	159	160	160	161	161	157	154	153	154	148
Balgreen Primary School	420	14	356	337	330	318	312	302	288	285	283	283	285
Blackhall Primary School	504	18	448	421	412	410	375	355	334	324	313	317	308
Bonaly Primary School	462	16	429	425	437	433	442	440	437	446	449	448	459
Broomhouse Primary School	259	10	228	234	254	250	255	261	264	261	275	273	275
Broughton Primary School	462	16	380	393	404	417	412	401	385	377	369	365	366
Brunstane Primary School	420	14	225	239	249	256	255	242	239	226	210	199	199
Bruntsfield Primary School	630	21	618	609	600	608	592	594	598	582	595	608	603
Buckstone Primary School	462	16	431	436	450	438	429	430	418	405	396	390	380
Bun-sgoil Taobh na Pairce	462	16	424	448	456	481	500	497	509	504	506	509	509
Canal View Primary School	420	14	358	337	324	329	330	321	333	319	344	344	344
Carrick Knowe Primary School	504	18	344	333	300	293	278	266	263	258	260	261	258
Castleview Primary School	434	15	325	399	445	464	465	481	514	517	524	499	496
Clermiston Primary School	476	17	468	474	485	474	452	443	433	442	439	430	438
Clovenstone Primary School	434	15	231	226	217	205	196	192	186	174	174	174	174
Colinton Primary School	315	12	168	164	159	142	128	119	114	112	114	113	116
Corstorphine Primary School	630	21	542	539	539	535	575	658	716	769	807	839	882
Craigentinny Primary School	420	14	270	267	283	281	278	274	280	280	282	281	284
Craiglockhart Primary School	476	17	359	340	340	321	312	301	297	298	297	294	307
Craigour Park Primary School	560	20	513	508	519	516	520	513	516	492	491	498	521
Craigroyston Primary School	434	15	281	283	280	295	299	310	321	332	345	350	339
Cramond Primary School	476	17	425	424	444	457	483	477	489	505	506	501	504
Currie Primary School	546	19	502	520	531	522	527	515	480	463	447	447	451
Dalmeny Primary School	112	5	85	83	85	91	90	95	90	93	95	95	94
Dalry Primary School	420	14	259	262	271	265	273	289	286	296	291	288	283
Davidson's Mains Primary School	630	21	561	550	533	503	510	504	497	479	472	474	480
Dean Park Primary School	476	17	469	488	495	508	506	507	515	503	494	501	502
Duddingston Primary School	434	15	377	371	375	386	376	370	362	362	362	362	351
East Craigs Primary School	476	17	429	423	408	413	415	429	431	422	422	433	423
Echline Primary School	315	12	303	306	312	319	326	339	371	383	400	419	442
Ferryhill Primary School	420	14	355	351	343	339	325	311	306	296	287	287	291
Flora Stevenson Primary School	630	21	581	586	569	563	548	532	514	500	497	500	503
Forthview Primary School	434	15	412	428	438	440	431	432	432	433	426	426	426
Fox Covert ND Primary School	294	11	287	292	302	312	297	289	284	290	280	277	277
Fox Covert RC Primary School	217	8	155	150	155	154	170	186	202	209	214	221	228
Gilmerton Primary School	546	19	473	533	596	687	739	770	781	768	752	738	727

**Primary School Roll Projections 2019-2029** 

School	Capacity	Classes	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
Gracemount Primary School	560	20	513	537	570	607	630	617	634	630	657	666	681
Granton Primary School	560	20	482	501	529	560	535	546	599	621	634	635	638
Gylemuir Primary School	546	19	503	489	474	472	488	488	482	491	502	516	527
Hermitage Park Primary School	420	14	317	310	301	287	271	260	255	253	249	247	250
Hillwood Primary School	84	4	62	61	67	81	92	92	96	95	98	98	100
Holy Cross RC Primary School	315	12	292	281	280	268	254	251	253	264	267	275	277
James Gillespie's Primary School	630	21	623	627	597	564	543	530	518	511	497	513	530
Juniper Green Primary School	434	15	412	405	398	404	417	431	453	460	469	479	470
Kirkliston Primary School	560	20	625	696	751	835	886	930	965	1008	1019	1021	1019
Leith Primary School	476	17	356	353	342	333	354	357	368	385	402	421	437
Leith Walk Primary School	420	14	234	229	204	192	181	162	151	144	143	143	143
Liberton Primary School	476	17	467	470	473	459	442	448	448	448	448	448	448
Longstone Primary School	315	12	253	251	237	220	199	191	181	165	165	165	165
Lorne Primary School	259	10	228	216	210	198	187	179	160	150	149	149	149
Murrayburn Primary School	420	14	382	380	350	352	321	319	316	306	301	317	312
Nether Currie Primary School	210	7	175	178	179	204	221	235	250	268	285	297	294
Newcraighall Primary School	210	7	183	211	214	221	252	284	329	373	407	448	490
Niddrie Mill Primary School	434	15	301	321	331	330	333	339	339	324	325	317	310
Oxgangs Primary School	434	15	346	336	332	320	315	310	306	313	313	313	318
Parsons Green Primary School	420	14	324	302	290	283	268	261	262	261	276	276	277
Pentland Primary School	504	18	443	451	453	451	447	439	437	446	439	432	437
Pirniehall Primary School	329	13	279	256	242	227	215	215	208	219	249	276	302
Preston Street Primary School	315	12	292	282	260	242	242	223	206	199	193	192	197
Prestonfield Primary School	294	11	190	194	190	189	189	185	184	182	181	183	187
Queensferry Primary School	504	18	458	458	470	509	567	610	640	652	667	678	685
Ratho Primary School	294	11	271	310	318	336	350	359	366	369	370	374	378
Roseburn Primary School	294	11	253	253	251	236	235	232	226	228	233	228	234
Royal Mile Primary School	210	7	141	139	130	128	131	126	121	121	122	121	123
Sciennes Primary School	630	21	652	625	627	614	586	558	544	524	528	513	514
Sighthill Primary School	294	11	245	254	238	223	204	198	190	186	177	181	181
South Morningside Primary School	630	21	662	673	697	698	693	697	689	681	684	669	676
St Catherine's RC Primary School	210	7	215	228	241	248	257	261	270	277	282	284	291
St Cuthbert's RC Primary School	210	7	200	194	195	193	193	194	194	194	198	201	202
St David's RC Primary School	329	13	315	325	342	355	357	357	368	370	369	374	377
St Francis' RC Primary School	315	12	264	269	294	318	329	326	336	354	359	359	356
St John Vianney RC Primary School	259	10	259	257	270	299	319	339	341	335	339	344	348

#### **Primary School Roll Projections 2019-2029**

School	Capacity	Classes	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
St John's RC Primary School	434	15	368	376	379	374	364	356	353	354	359	365	371
St Joseph's RC Primary School	329	13	310	314	324	320	311	295	292	294	297	299	299
St Margaret's RC Primary School	210	7	109	100	110	124	132	145	157	163	168	173	177
St Mark's RC Primary School	210	7	154	154	157	148	149	147	147	145	146	144	147
St Mary's RC Primary School (Edin.)	434	15	334	327	328	312	306	289	283	287	286	286	289
St Mary's RC Primary School (Leith)	420	14	346	339	336	335	329	326	329	323	328	333	338
St Ninian's RC Primary School	315	12	252	253	244	228	210	218	207	207	209	208	209
St Peter's RC Primary School	434	15	374	368	353	341	327	322	334	338	347	360	375
Stenhouse Primary School	420	14	346	346	345	349	344	332	323	321	321	326	327
Stockbridge Primary School	294	11	268	258	271	261	256	249	243	230	229	226	232
The Royal High Primary School	420	14	329	310	325	333	357	358	358	358	380	375	369
Tollcross Primary School	315	12	255	279	264	259	251	242	230	208	182	180	178
Towerbank Primary School	630	21	617	599	558	522	487	471	434	410	410	410	410
Trinity Primary School	630	21	570	574	553	553	532	517	490	465	458	465	460
Victoria Primary School	315	12	280	291	281	300	328	350	368	390	403	418	426
Wardie Primary School	560	20	516	504	505	482	456	438	421	406	394	389	395
Totals	36,015	1,266	30,878	31,052	31,180	31,278	31,225	31,211	31,297	31,266	31,484	31,709	31,997

# **Secondary School Roll Projections 2019-2029**

School	Notional Capacity	Current Roll	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
Balerno Community High School	850	752	804	834	853	892	929	958	1018	1056	1071	1091
Boroughmuir High School	1200	1310	1367	1414	1501	1553	1550	1575	1640	1637	1646	1652
Broughton High School	1200	1140	1154	1162	1177	1215	1241	1256	1276	1293	1304	1284
Castlebrae Community High School	600	241	315	400	475	557	630	690	735	747	770	780
Craigmount High School	1400	1192	1243	1242	1286	1339	1345	1371	1391	1426	1441	1451
Craigroyston Community High School	600	591	613	634	659	692	688	713	734	752	769	794
Currie Community High School	900	719	735	747	768	761	770	783	793	815	816	842
Drummond Community High School	600	380	421	472	522	558	581	590	585	572	561	551
Firrhill High School	1150	1220	1227	1235	1245	1245	1243	1227	1208	1192	1191	1151
Forrester High School	900	733	764	809	841	836	852	866	870	856	849	856
Gracemount High School	650	552	593	628	659	708	774	811	831	827	830	803
Holy Rood RC High School	1200	1075	1117	1150	1170	1207	1241	1291	1303	1314	1333	1324
James Gillespie's High School	1300	1327	1431	1544	1630	1678	1803	1884	1945	1946	1927	1910
Leith Academy	950	950	952	975	993	992	996	993	981	968	966	965
Liberton High School	850	667	738	799	863	924	992	1067	1119	1176	1200	1186
Portobello High School	1400	1405	1418	1436	1446	1446	1446	1439	1444	1421	1421	1422
Queensferry Community High School	1000	880	945	1009	1044	1113	1216	1324	1413	1515	1637	1750
St Augustine's RC High School	900	773	837	849	894	922	945	963	976	1014	1014	1021
St Thomas of Aquin's RC High School	750	779	787	782	806	808	831	832	815	811	790	779
The Royal High School	1200	1274	1314	1336	1392	1459	1533	1566	1549	1585	1567	1524
Trinity Academy	950	854	873	913	933	959	978	993	997	998	1000	1000
Tynecastle High School	900	621	658	668	674	690	698	725	721	728	725	704
Wester Hailes Education Centre	750	337	366	405	418	430	437	430	426	409	394	383
Total Roll	22,200	19,772	20,672	21,443	22,249	22,984	23,719	24,347	24,770	25,058	25,222	25,223

