



PEGASUS CONSULTANCY

# Representation to Choices for City Plan 2030 (Edinburgh Local Development Plan 2 Main Issues Report)

On behalf of Inverdunning (Hatton Mains) Ltd

March 2020



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## Section I - Introduction

1.1 Inverdunning (Hatton Mains) Ltd welcome the opportunity to engage with City of Edinburgh Council in the first stage of preparation of their new City Plan 2030.

1.2 The preparation of this plan coincides with an important period in terms of economic, political and environmental change. The need to create a robust plan for Edinburgh's future is recognised as crucial if the city is to deliver the required framework for sustainable growth.

1.3 This representation addresses the choices put forward by the Council in the Choices for City Plan 2030 document (Local Development Plan Main Issues Report).

1.4 In this respect, the over-arching objectives for Edinburgh's future set out in 'Choices' are supported in terms being:

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

1.5 Within these wider objectives, the Council puts forward 16 choices or preferred/alternative proposals to deliver these aims. This representation specifically addresses Choices 1,2, 4, 5, 6, 7, 8, 10, 11, 12, 13 and 14 as detailed on the facing Contents page.

1.6 Inverdunning (Hatton Mains) Ltd have a particular interest in delivering new communities to allow Edinburgh to prosper and accommodate planned growth. This representation addresses the highlighted 'choices' in the context of support for creation of a new sustainable community at Hatton Village, within West Edinburgh.

1.7 As highlighted on **Figure 1** on Page 4, Hatton Village is located on the A71, one of the key arterial routes into the city, and this representation will demonstrate how the site can provide a high quality, sustainable and deliverable option for accommodating part of Edinburgh's significant housing demand over the next decade.

1.8 The representation is supported by a full suite of supporting studies (attached as appendices) which demonstrate the commitment of Inverdunning (Hatton Mains) Ltd to the delivery of Hatton Village and illustrate the deliverability of the proposal in the context of the emerging City Plan 2030.

1.9 Given the level of information provided with this representation, Inverdunning (Hatton Mains) Ltd would welcome the opportunity of meeting with City Plan officers to talk through the proposal and answer any queries, ahead of preparation of the Proposed City Plan 2030 later this year.



Figure 1 - Hatton Village Site Location



## Section 2 - Making Edinburgh a sustainable, active and connected city ('Choice 1')

2.1 Inverdunning (Hatton Mains) Ltd support the City Plan 2030 aims of creating an integrated high quality green and blue infrastructure into all new development to assist with tackling the impacts of climate change and supporting the health and wellbeing of Edinburgh's residents and visitors.

### Proposed Change 'A'

2.2 It is noted that the Council wish to provide a stronger policy to ensure that Edinburgh's green spaces are connected and allows for a multi-functional local, city, regional and national network. This proposed change is supported.

2.3 As highlighted on Map 1 of Choices (**Figure 2** below), the A71 provides an active travel route between Livingston and West Edinburgh. The Hatton Village proposal sits on this route, north

of Dalmahoy and south of Ratho. The proposal would allow for significant new multi-functional greenspace to be created, with existing walking and cycling linkage to both the Dalmahoy landscape to the south and Union Canal corridor to the north. The new greenspace would provide both a local resource and an asset for West Edinburgh including nearby communities such as Ratho, Bonnington, Hermiston and Heriot-Watt University.

### Proposed Change 'B'

2.4 All new development within City Plan 2030 is to provide integrated green and blue infrastructure including new tree planting and natural drainage solutions (ponds, swales, raingardens etc) and making best use of natural features. This proposed change is supported.

2.5 The Hatton Village proposal has been designed using the existing landscape and natural drainage as first principles. The indicative design (please refer to **Figure 3** on Page 7) has incorporated existing lower-lying areas for natural

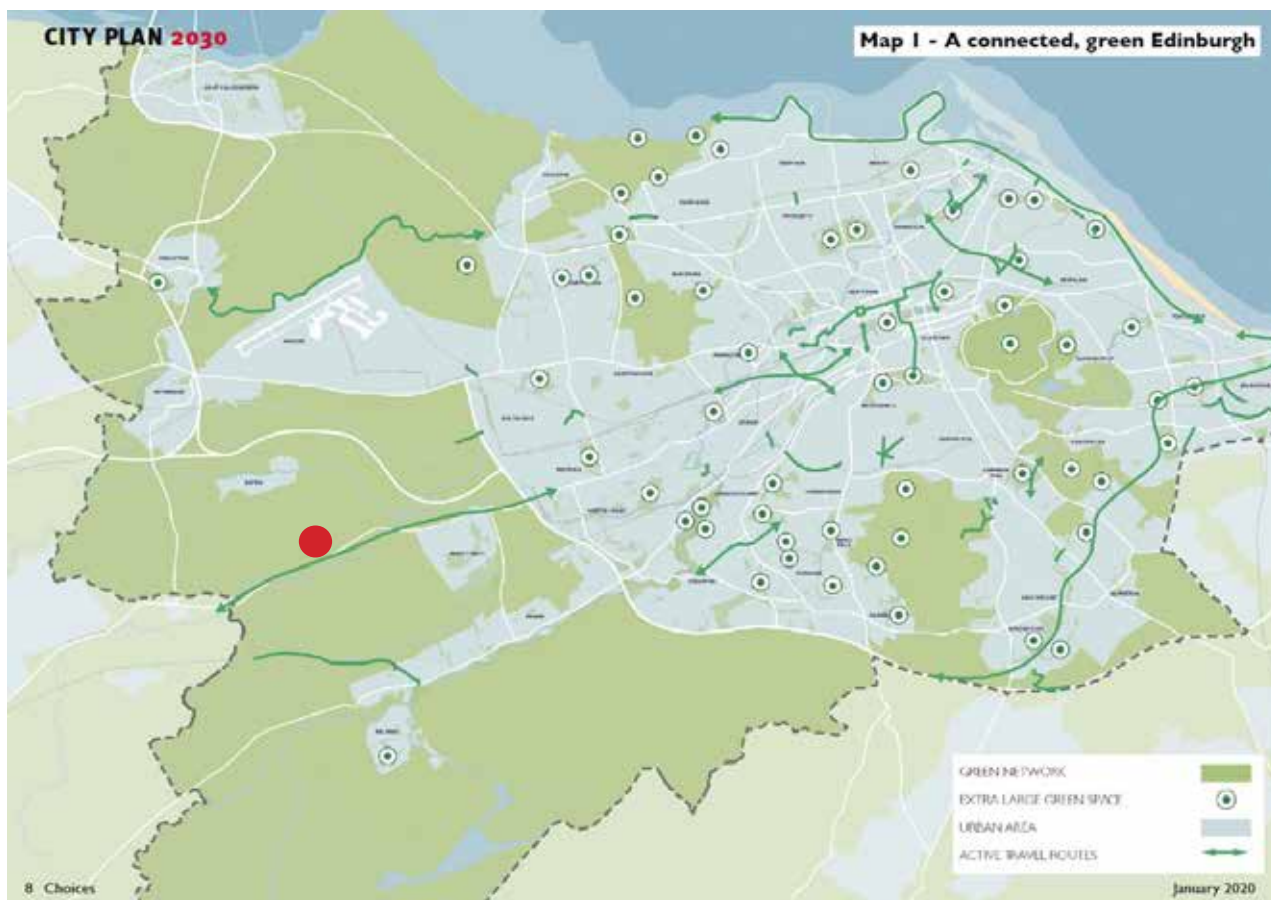


Figure 2 - MIR Green Network/Active Travel Map  
(Hatton Village site denoted in red)

surface water drainage and allows for a series of high quality, integrated greenspaces which provide a range of functions including active open space, informal amenity areas, landscape planting, natural drainage areas and potential growing space. The indicative design is based on an earthworks/drainage approach which minimises disruption to the existing environment, retains all key natural (and man-made) site features including boundary planting, paths, key field boundaries and views.

### **Proposed Change ‘C’**

2.6 The need for development to incorporate future water management in association with climate change is noted and supported. The proposal at Hatton Village incorporates sufficient greenspace to allow for flexibility and future change.

### **Proposed Change ‘D’**

2.7 It is noted that the Council wish to identify circumstances where poor quality existing open space can be redeveloped. This is supported.

### **Proposed Change ‘E’**

2.8 The Council wish to introduce a new ‘extra large greenspace standard’ aimed at providing communities with access to spaces of 5 hectares and over. This would increase the current ‘large’ greenspace standard of 2 hectares within the adopted Local Development Plan.

2.9 This approach requires more clarification in terms of when the ‘extra large’ standard would apply, given the proposed greenspace area is equivalent to the Meadows as stated within the Choices document.

2.10 The proposals at Hatton Village allow for extensive greenspace/landscaping of 23 hectares overall with a 3.8 hectare linear park as currently designed but there is scope to increase this allowance through the detailed design process. As noted above, it is considered that this space could provide a resource not only for new residents of the village but the wider community along the A71

corridor. As such, Inverdunning (Hatton Mains) Ltd would welcome further discussion on the role and required extent of new greenspace in context of this proposal.

### **Proposed Change ‘F’**

2.11 Specific areas for new allotments/growing space are to be identified as part of new development proposals. This proposal is supported.

2.12 The multi-functional greenspace proposed at Hatton Village can provide allotments/growing space with the specific size of such space to be developed via detailed design, alongside suitable management arrangements.

### **Proposed Change ‘G’**

2.13 The need for additional burial space is noted and supported as part of a city-wide strategy.

### **Proposed Change ‘H’**

2.14 The need for long term management and maintenance provisions for greenspace within new developments is noted and supported. The Hatton Village proposal is for a new community with associated greenspace likely to be factored as part of a Deed of Conditions attached to new development.

2.15 This approach has been implemented in new communities elsewhere throughout the Lothians and is considered a suitable approach for Hatton Village. As Inverdunning (Hatton Mains) Ltd are the promoter, it is in their control to set out provisions for implementation, management and maintenance of greenspace as and when development parcels are brought forward, tied to an overall masterplan.



Figure 3 - Hatton Village Indicative Masterplan

## Section 3 – Improving the quality, density and accessibility of development (‘Choice 2’)

3.1 Inverdunning (Hatton Mains) Ltd recognise the importance of good design in creating of new development within Edinburgh and note the Council’s desire to increase emphasis on a number of design measures when assessing new proposals.

### Proposed Change ‘A’

3.2 The Council seek new development, via a Design & Access Statement, to demonstrate how measures will be incorporated to tackle and adapt to climate change, provide for future adaptability and accessibility (people with varying needs, age, mobility). These measures are supported.

3.3 The proposed Hatton Village seeks to create a new community with the indicative design incorporating a village centre which is to be a public transport hub (with cycle hire/parking, car club and a new stop for existing services along the A71) with associated services/amenities (local workspace, café/information centre and other community services).

3.4 The intention is for the village to be primarily served by public transport (connecting to enhanced services, close proximity to Hermiston park and ride and access to new/improved cycle links) with provision of local workspace and amenities also minimising local trips. The hub is to include higher density buildings around a community space, with design flexibility to allow for adaptation of uses over time.

3.5 The supporting Transport Assessment (**Appendix 5i**) sets out some of these measures with further discussion with the Council and local operators planned to detail these proposals to ensure Hatton Village has climate change, adaptability and accessibility at the forefront.

### Proposed Change ‘B’

3.6 The Council propose to change policy to require a minimum density of 65 dwellings per

hectare (dph) on all new housing sites (urban and greenfield) with specifically identified locations to provide for a minimum of 100 dph. In tandem with this densification is support for a vertical mix of uses with the overall intention being to maximise public transport / active travel routes.

3.7 It is noted that the Choices document raises the caveat of ensuring development respects amenity and is of appropriate character. This is also reflected in existing Edinburgh Design Guidance.

3.8 Whilst the overall aim of densification across new development is supported, it is considered that more of a range is required to ensure all forms of housing are delivered and site context is taken into account. In urban locations on public transport routes, this level of density is appropriate and being delivered. In edge-of-city locations, densities currently reflect family housing typologies with front and back gardens which are generally less than half the proposed density (c.30dph). This density range across Edinburgh is illustrated in Map 2 of the Choices document and reflects an established transition from higher density in centre to lower density in outer/rural edge areas.

3.9 To deliver a minimum of 65 dph, new development would have to incorporate a significant level of high density housing (with a large proportion of flatted units).

3.10 It is noted that the approved Edinburgh Design Guidance includes an example of density at 69 dph at Gracemount (21st Century Homes) which is a mix of flats and houses. When reviewing the planning documents for this scheme, it is noted that of the 215 units on the 3.1 hectare site, 163 are flatted (3/4 storey blocks and 3 storey colony type blocks) with 52 terraced houses. The split is 75% flats/25% houses. As illustrated in **Figure 4**, this produces a very urban streetscene and the high proportion of flatted units do not provide a range of accommodation for growing families.

3.11 This broad level of density is also achieved a Calder Road, Sighthill (Keepmoat Homes) with a density of 72 dph (184 units on 2.57 hectare site) with an 80%/20% split of flats (149) to houses (35).





Figure 4 - 21st Century Homes, Gracemount, Edinburgh



Figure 5 - Site Layout, Calder Road, Sighthill, Edinburgh

As illustrated on **Figure 5**, this requires an urban, high density design.

3.12 As set out in the extract below from the Urban Design Compendium (HCA, 2000), density can be varied and indeed offers improved placemaking rather than applying a blanket threshold:

*“Within the higher density levels which sustain urban life, variations in the net density of built form profiles will occur naturally. This can be enhanced by building up the mass around centres, public transport access points, parks and riverfronts, for example. Shape the mass of built form to frame positive spaces. In contrast, much recent development, which may have exactly the same population density of its traditional counterpart, is characterised by flat, featureless density profiles. This is the product of building down to imposed standards or density levels..”*

3.13 General density ranges and associated housing typologies are also set out in the Urban Design Compendium. This notes that density needs to reflect context and a mix of densities is required in larger developments to ensure different social

groups are catered for.

3.14 The link between density and public transport accessibility is well established. As detailed in the Urban Design Compendium research suggests net densities of 100 persons per hectare are required to sustain a good bus service, which equates to around 45 dph based on UK average household size of 2.2 persons.

3.15 An example of this level of density is an award-winning development at Cambridge (‘Accordia’) with a density of 40dph (see masterplan and images in **Figure 6** below). It should be noted that of the 382 units in the scheme, there were 213 houses and 169 apartments so a 56%/44% split. Whilst an attractive development, this approach still produces a very urban environment based on terraced and flatted units. It is considered that in order to provide a full range of housetypes, lower densities may be required in some locations.

3.16 For urban villages, as proposed at Hatton Village, density guidelines must allow for a transition between centre and rural edge. The density guideline





Figure 6 - Accordia, Cambridge at c.40dph



Figure 7 - Glasgow Athletes Village at c.35dph

could be varied for more urban or more rural edge locations. For example, the Athletes Village at Dalmarnock, Glasgow was based upon a density of approximately 35 dph (704 units on the residential part of site extending to just under 20 hectares). This example had an emphasis on providing housing over flats with the split being approximately 90%/10% houses to flats, albeit with urban terraces being the predominant form as illustrated in **Figure 7**.

3.17 In England, the concept of new garden villages is well established and urban extensions are focussed on strong urban design principles with densities appropriate to their context. One example of a settlement/rural edge urban village is Broughton Atterbury, Milton Keynes with a 55 hectare site with 750 homes at average density of 34 dph (net residential area of 22 ha.). **Figure 8** illustrates how this provides more of a mix of housetypes which allow for framing of greenspace without being overly urban (or overly suburban).



Figure 8 - Broughton Atterbury at c.34dph

3.18 Furthermore, when reviewing density guidance within adjoining local authorities, it is noted that West Lothian's Community Growth Areas are required to provide for a minimum density of 25 dph overall with higher density considered to be 45 dph, medium density 30dph and low density 15 dph. Whilst not as urban an area as Edinburgh (where high density would far exceed West Lothian's upper level), the approach reflects the need for a varied density for new development areas.

3.19 Referring back to the proposal at Hatton Village, the net developable area for residential use is approximately 32 hectares within an overall site area of 58.5 hectares with the balance comprising woodland, landscaped multi-functional greenspace, drainage infrastructure and a site for community/ education use. The indicative design was based upon a range of densities to reflect a village form, i.e. higher density flatted development with ground-floor non-residential uses in the village centre, surrounded by medium density housing and then lower-density, larger plots in the northern part of the site to reflect the transition to adjoining rural area. This range of density is considered appropriate for this new village location with the indicative design based on an overall density of around 37 dph (ranging from 20 to 60 dph) providing for an overall indicative capacity of approximately 1,200 homes with scope for range of housetypes (approximate split of 75% houses, 25% apartments) whilst avoiding a suburban appearance. This is illustrated within the supporting Design Statement and Indicative Masterplan (**Appendix 4**).

3.20 Should a minimum 65 dph density be applied to this site, the indicative capacity would increase to over 2,000 homes. Whilst maximising land use, this approach would require a density inappropriate to its location, with detrimental impact on the character of the surrounding area. As highlighted above, the housetype choice would also be predominantly flatted units which would not offer family living accommodation.

3.21 It is therefore considered that density should be assessed in the context of the surrounding area. Should Edinburgh consider it necessary to apply a minimum, there should be recognition of

the difference between urban locations (where 65 dph should generally be achievable) and urban extensions or new villages where a lower average density is required to deliver a wider range of housetypes. Given the above examples, an average minimum density in the region of 35 dph would appear far more suitable to ensure varying social groups are catered for and more sensitive locations are not over-developed.

3.22 The proposal to ensure a vertical mix of uses is supported in the context of higher density development areas. This is reflected in the hub area proposal for Hatton Village, with flexible space allowing for a range of associated uses to provide local amenities and facilities and minimise local trips.

### **Proposed Change 'C'**

3.23 The proposal to ensure that new development street design and layout reflect Edinburgh's Street Design Guidance and wider good urban design principles set out in Scottish Planning Policy is supported. The indicative design for Hatton Village is considered to reflect these principles in terms of a strong, permeable network of streets within an identifiable hierarchy, set around a new village square. Detailed design will further develop this approach as the planning process progresses.

### **Proposed Change 'D'**

3.24 The proposal for all development to deliver quality open space and public realm to permit a range of activities is wholly supported and reflected in the indicative Hatton Village proposals which include village square/hub, a linear park, local parks and amenity areas linked to drainage and walking/ cycling infrastructure.

## Section 4 – Creating Place Briefs and supporting the use of Local Place Plans in our communities (‘Choice 4’)

4.1 Inverdunning (Hatton Mains) Ltd support the need for improved community engagement through the planning process and welcome the proposals for Place Briefs and Local Place Plans in due course.

### Proposed Change ‘A’

4.2 With regard to Place Briefs, it is noted that the Council wish to ensure that all new housing sites are supported by Briefs which provide the key elements of design, layout, open space, biodiversity net gain and community infrastructure.

4.3 Inverdunning (Hatton Mains) Ltd engaged early with the local community for the Hatton Village proposal to enable some of the main issues to be assessed (see **Appendix 2**). It is considered that the significant amount of early work undertaken for Hatton Village has allowed for a realistic and highly beneficial proposal to be brought to the forum of the LDP Main Issues Report. This has allowed an indicative design to be developed based on real information and constraints. However, it is accepted that this is not a ‘final’ design and further engagement

with both the local community and Council officers will further shape the proposal in due course.

4.4 In this respect, the work undertaken to date provides a strong platform for creation of a Place Brief for Hatton Village as a proposed housing allocation in the next stage of the LDP process. The Proposed LDP consultation would allow for further local community views to be taken on board in shaping the design and Inverdunning (Hatton Mains) Ltd are also proposing to hold further public engagement during 2020 to ensure the proposal is fully assessed.

### Proposed Change ‘B’

4.5 It is noted that Local Place Plans will be formally implanted through the provisions of the Planning (Scotland) Act 2019 which will inform the next LDP. Based on current Scottish Government timescales, it is understood regulation and guidance may be published during 2021. At this stage, the recognition of the emergence of Local Place Plans is supported but it is not understood how detailed requirements can be included in this LDP if proposed timescales are achieved (Proposed LDP in Summer 2020). As such, the development of Local Place Plans and how they will operate, geographically and funding-wise, requires further information to be made available.



Figure 9 - Hatton Village website extract



## Section 5 – Delivering Community Infrastructure (‘Choice 5’)

5.1 The aim of directing City Plan 2030 growth to areas where there is capacity within existing infrastructure or where new infrastructure will be accommodated is supported.

5.2 It is noted that the Council have undertaken a high level assessment of new school infrastructure required to support both the urban and greenfield housing growth options set out within the paper. It is also noted that there is no detail to support the projected school requirements as yet with a full education infrastructure appraisal to be prepared to support the Proposed LDP.

5.3 Similarly, for healthcare requirements, it is noted that the Edinburgh Health and Social Care Partnership will prepare a Primary Healthcare Appraisal to support the Proposed LDP.

5.4 With regard to transport infrastructure, the MIR is supported by a Strategic Sustainable Transport Study (Phase I) which examines ten strategic transport corridors. This has identified two corridors as being suitable for the delivery of new transit solutions to deliver City Plan 2030. It is noted that a full Transport Appraisal will support the Proposed LDP and proposed Action Programme.

### Proposed Change ‘A’

The aim to focus on areas either with existing infrastructure or scope for infrastructure capacity within the plan period is noted and supported. With regard to the proposal at Hatton Village, we would comment as follows:

#### *Education Infrastructure*

5.5 An education capacity impact statement has been prepared in support of Hatton Village (**Appendix 3**). This is based on the indicative site capacity of 1200 units which would be subject to detailed design and density guidelines. Based on existing pupil product ratios, the proposal produces 264 non-denominational primary pupils, 169 non-

denominational secondary pupils, 41 denominational primary pupils and 30 denominational secondary pupils, phased over a 9 year period (indicative completions programme being between 2022/23 and 2030/31 allowing for planning/build lead-in period and maximum of 150 units per annum).

5.6 The assessment takes into account the non-denominational catchment area changes approved in 2019 with the site now within the catchment area of Balerno High School and Dean Park Primary School (Balerno). The denominational schools remain St. Augustine’s High School and St. Cuthbert’s Primary School.

5.7 Taking into account projected LDP housing growth (which remains indicative at the MIR options stage), there is significant growth planned for the denominational school catchment areas as they cover large parts of Edinburgh’s urban area. There are currently no contributions required to these schools but on the basis of potential growth, additional capacity would be required. The proposal at Hatton Village has a negligible impact on this overall requirement but could make fair and reasonable contributions if required.

5.8 There is no projected LDP housing growth within the non-denominational schools catchment areas at this stage. The impact of Hatton Village has therefore been assessed in the context of the latest forecast pupil projections.

5.9 Dean Park Primary School is to be extended in 2020/21 to accommodate existing projections with a further extension agreed if required. On the assumption of first potential completions at Hatton Village in 2022/23, there is scope to accommodate the first 500 units of this proposal prior to extended capacity being exceeded. Capacity solutions thereafter include a new primary school within Hatton Village (site safeguarded in indicative masterplan), a combined/split campus with Ratho Primary and/or utilising spare capacity at Currie Primary. Given the short-medium term capacity at Dean Park, there is scope for financial contributions to be built up at Hatton Village to implement the agreed solution within the required timescales to ensure deliverability of the site within City Plan

2030.

5.10 Balerno High School will require additional capacity to accommodate existing projections by 2022/23 with the Council understood to be considering options of an extension of replacement school on the same site. The addition of Hatton Village will increase the maximum forecast roll be approximately 150 spaces (1,091 to 1,245 by 2029). Given the existing need for additional capacity, the Hatton Village proposal could make fair and reasonable financial contributions to this requirement.

5.11 Overall, the assessment demonstrates that Hatton Village could be delivered within the City Plan 2030 timeframe with no insurmountable infrastructure constraint.

#### Healthcare Infrastructure

5.12 The Primary Healthcare Appraisal to be prepared for the Proposed LDP will set out more detail on requirements for this infrastructure element. However, in terms of the Hatton Village proposal, the intention is for new facilities to be accommodated within the village hub, with flexible

ground floor space proposed.

5.13 In the short term, prior to on-site provision, it is noted that the LDP Action Programme sets out a planned expansion of medical practice facilities for the Pentlands Medical Centre (South-West Edinburgh) with options to be explored. Options to accommodate Hatton Village, including Ratho Medical Centre, would be fully explored and agreed with the Council but given the existing need for additional capacity, this is not considered an insurmountable infrastructure issue.

#### Transport Infrastructure

5.14 The Council's Strategic Sustainable Transport Study (Phase 1) examines ten strategic transport corridors and supports two (South East Edinburgh via BioQuarter and Newbridge/IBG) for delivery of new transit solutions to deliver City Plan 2030. It is noted that Corridor 8 – West of Hermiston, is also supported for extension of the tram line to allow for future development in West Edinburgh but that this would not be achievable within City Plan 2030 timescales.

5.15 Corridor 8 is based upon the A71 corridor

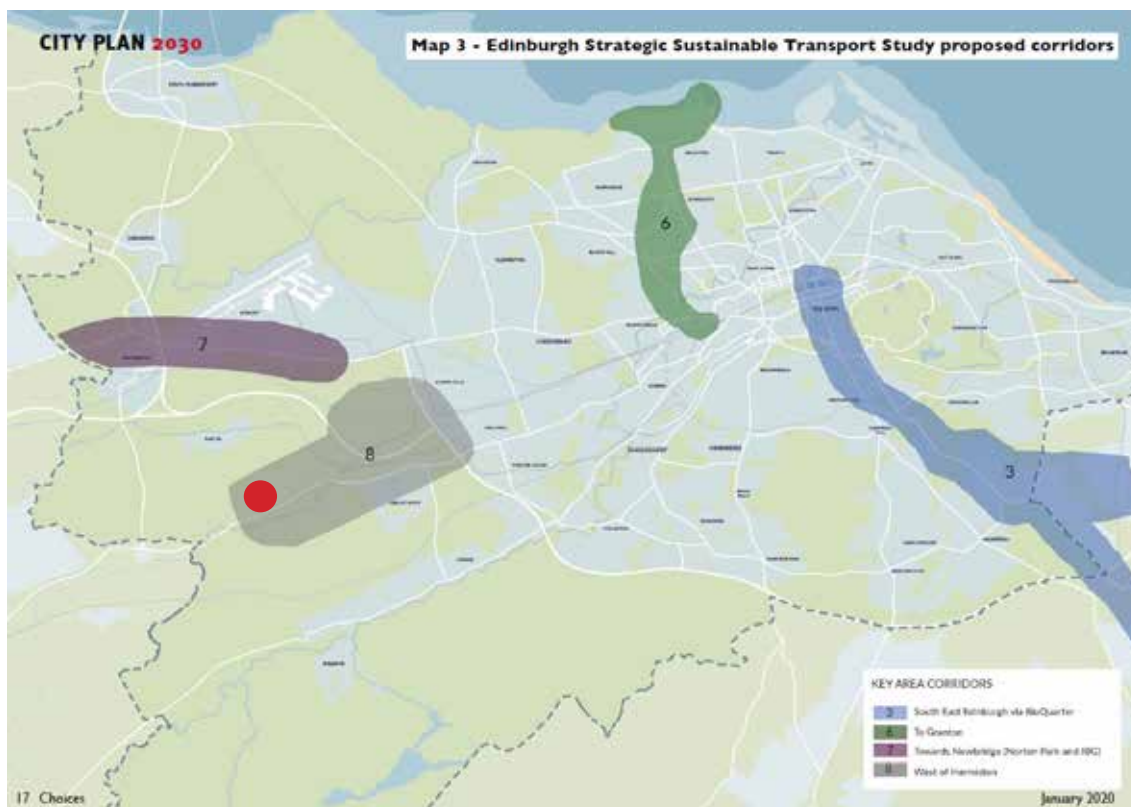


Figure 10 - Sustainable Transport Study Corridors  
(Hatton Village site denoted in red)

heading west out of Edinburgh with the Hatton Village site within the identified study area, as illustrated on **Figure 10**.

5.16 The Study describes this corridor as including the “*broad corridor west of Hermiston, encompassing Heriot-Watt University and Curriehill Station and future potential development areas*”. Opportunities for this corridor are noted as: “*significant greenfield land offers potential transit-led development and urban expansion*”, “*opportunities to connect Heriot-Watt, Hermiston Park and Ride and Curriehill Station*” and “*opportunity to link with existing tram route around Edinburgh Park or Bankhead or for bus-based transit options*”.

5.17 The Study assesses this corridor positively against five key objectives (set out below in **Figure 11**) noting that there is potential to deliver large-scale sustainable development.

5.18 Transit options are set out by the Study which are based upon the existing A71 bus route, Hermiston Park and Ride, Curriehill Rail Station and linkage to the tram line and employment areas. The potential connection to the tram network is highlighted with overall options for the area being

either extension of the tram network or a bus rapid transit approach utilising existing routes. It is noted that the bus rapid transit option would be more suited to more dispersed development patterns along more than one corridor in the study area and could be more easily phased and implemented alongside development growth.

5.19 The Study sets out deliverability risks which are noted as medium with the bus rapid transit option to either be an ‘end to end’ service to the city centre or a ‘feeder’ service into the tram network.

5.20 If focusing on bus rapid transit, this corridor could enable the delivery of sustainable development within the City Plan 2030 period, with tram extension then being a future option.

5.21 The Hatton Village proposal is supported by a full Transport Assessment (**Appendix 5i**) which sets out key transport interventions and a public transport strategy which would enable connection into the identified Corridor 8 transport study area.

5.22 This includes utilising express services along the A71 corridor (the site is served by existing

Table 9-1: West of Hermiston Corridor compliance with objectives

ESSTS objective	Commentary	Assessment
Sustainable Economic Growth and Development	<ul style="list-style-type: none"> <li>Potential for transit to support the development of large-scale development and sustainable communities, supporting the long-term growth needs of the city.</li> <li>Improving public transport connectivity between Heriot Watt, Edinburgh Park, the city centre and beyond.</li> <li>Improving business efficiency for firms in the corridor.</li> </ul>	✓✓✓
Improved equity & social inclusion	<ul style="list-style-type: none"> <li>Improved public transport accessibility to jobs, education, healthcare and leisure for existing residents of Currie.</li> <li>Improved access to education (Heriot Watt) from across the city.</li> <li>Opportunity to foster equity and social inclusion through the development of new communities.</li> </ul>	✓✓
Reduce transport-related carbon emissions	<ul style="list-style-type: none"> <li>Provision of direct high-quality public transport access to key housing / mixed use / employment sites could encourage fewer / shorter trips overall through the sustainable development of a major new development area.</li> </ul>	✓✓✓
Improved built & natural environment	<ul style="list-style-type: none"> <li>Transit can support development of high-quality place by supporting high-density and quality developments.</li> <li>Transit and active travel provision can support high-quality streetscape.</li> </ul>	✓✓✓
Improved health, wellbeing & safety	<ul style="list-style-type: none"> <li>Health enhanced through provision of maintenance of active travel corridor and enhanced public transport, leading to healthier lifestyles and fewer emissions.</li> <li>Modal shift and scope to reduce traffic volumes / speed would reduce accidents and emissions.</li> </ul>	✓✓

Figure 11 - ESSTS - Corridor 8 (West of Hermiston) Objectives

bus stops), extension of existing service from Ratho to the north, a transport hub in the village centre (car club, cycle parking, EV charging points, bus stop/turning, local facilities including work hub), safeguarding frontage of site along A71 to provide for pedestrian/cycle linkage along corridor, improved footpath connection to Ratho, a new left-only junction to ease flows on the existing A71/Dalmahoy Road junction and ensuing a permeable street network within the masterplan area to maximise accessibility.

5.23 Hatton Village could be integrated into the Corridor 8 improvements with the village hub potentially serving as a end of line hub for bus rapid transit options.

5.24 It is considered that Corridor 8 (West of Hermiston) should also be supported for delivery of new transit solutions to deliver City Plan 2030 within the Strategic Sustainable Transport Study as a bus rapid transit approach would be viable in the plan period.

5.25 The potential for sustainable transport connections for Hatton Village is considered to wholly deliverable within the City Plan 2030 period.

### **Proposed Change ‘B’**

5.26 The proposal to ensure new community facilities are well connected to active travel routes and in high accessibility areas is supported. The scope of Hatton Village to accommodate community facilities is outlined in supporting documents and the hub would provide a central location, accessible by public transport, cycling and walking

### **Proposed Change ‘C’**

5.27 The aim to co-locate community facilities close to the communities they serve is supported via the proposals at Hatton Village with an integrated multi-use hub.

### **Proposed Change ‘D’**

5.28 It is noted that Edinburgh’s draft developer

contributions guidance in relation to healthcare provision was not approved by Scottish Ministers and that the emerging LDP will require to set out requirements for financial contributions in a more transparent manner. The Hatton Village proposal includes flexible space to accommodate community/healthcare uses as required and the project could deliver financial contributions based on a fair and reasonable approach.

### **Proposed Change ‘E’**

5.29 The proposal to set out developer contributions within the plan, Action Programme and non-statutory guidance rather than supplementary guidance is noted and supported.



## Section 6 – Creating places that focus on people, not cars ('Choice 6')

6.1 City Plan 2030 seeks to create a strong shift to public transport and active travel which is supported.

### Proposed Change 'A'

6.2 A new policy is proposed to assess development against its ability to meet targets for public transport usage and walking and cycling. It is noted that these targets will vary depending on current or planned public transport services and high quality active travel routes.

6.3 This approach is generally supported and the proposal at Hatton Village demonstrates how sustainable development could be delivered within the plan period based upon high quality and frequency bus connectivity with West Edinburgh and the City Centre. The proposal would also assist with delivering improved cycle linkage along the A71 corridor.

### Proposed Change 'B'

6.4 It is proposed that Place Briefs set out targets for public transport, cycling and walking based on current and proposed transit interventions, which will also determine appropriate parking levels. Again, this approach is supported on the basis that Corridor 8 is deemed a viable area for growth in the City Plan 2030 period.

## Section 7 – Supporting the reduction in car use in Edinburgh ('Choice 7')

7.1 City Plan 2030 seeks to reduce car use in Edinburgh and have no minimum parking standards.

### Proposed Change 'A'

7.2 Parking standards are proposed to be determined by modal targets for walking, cycling and public transport which could be set by area or development type. This is generally supported.

### Proposed Change 'B' and 'C'

7.3 No specific comment.

### Proposed Change 'D'

7.4 The proposal to support safeguarding of land for an extension of Hermiston Park and Ride car park is supported.

## Section 8 – Delivering new walking and cycling routes (‘Choice 8’)

8.1 City Plan 2030 supports delivery of a strategic network of walking and cycling routes across the city.

### Proposed Change ‘A’

8.2 Edinburgh’s Cycle and Footpath Network is to be updated to provide criteria for new routes which is to include cross-boundary routes connecting growth areas and strategic employment areas, connections between park and ride areas and linking public transport interchanges, network of centres and local links across the city. This is supported by the proposals at Hatton Village.

### Proposed Change ‘B’

8.3 A number of routes are to be added to the network as active travel proposals including the A71 cycle super highway linking South Livingston and West Edinburgh (see **Figure 12** below). This is supported and Hatton Village can assist in delivering this route through safeguarding of land along the site frontage onto the A71. The indicative masterplan (**Appendix 4**) proposes a high quality landscaped frontage which would improve walking/cycling amenity by providing an off-line route running parallel to the A71 to mitigate traffic impact and increase its attractiveness. This would be linked by an internal path network throughout the proposed village and improved links to Ratho.



Figure 12 - MIR proposed walking & cycling routes  
(Hatton Village site denoted in red)

## Section 9 – Creating sustainable communities (‘Choice 10’)

9.1 In order to deliver the Council’s preferred strategy of 100% urban sites for meeting housing requirements, Choice 10 seeks to create a policy to bring forward housing within sites proposed for other non-housing uses.

### Proposed Change ‘A’

9.2 The policy on student housing is to be amended to require new-build developments to deliver market and affordable housing as part of the overall mix. The deliverability of this is questioned with regard to existing schemes based on a student housing-only financial model, the resultant need to find additional student housing sites (would one off-set the other in terms of housing provision) and practical management and maintenance issues relating to restricted urban sites where there may be three managers (private student housing company manager, private residential factor and RSL/social housing factor).

### Proposed Change ‘B’

9.3 A proposed policy change would require all sites over 0.25 hectare coming forward for student housing, hotels/short-stay visitor accommodation, commercial business, retail and leisure developments to provide at least 50% of the site for housing. Again, the deliverability of this proposed policy is questioned in terms of pre-existing contractual/funding arrangements, the additional units being off-set by need to for additional non-residential space elsewhere and management issues.

### Proposed Change ‘C’

9.4 A policy is proposed to make better use of out-of-centre single-use retail units and centres with the introduction of housing or mixed-use requirements. This is generally supported but again the deliverability in terms of existing ownership/funding arrangements is questioned.

## Section 10 – Delivering more affordable homes (‘Choice 11’)

10.1 The Council wish to deliver more affordable homes within the city and have a current commitment to deliver 20,000 new affordable homes in the next decade. This is to be delivered via both the Council’s own housing programme and via the percentage policy for new market developments.

### Proposed Change ‘A’

10.2 The Council wish to increase the proportion of affordable homes policy from 25% to 35% on all housing developments of over 12 units. The Hatton Village proposal supports this policy change with scope for delivery of 420 new affordable homes based on the current indicative site capacity (1200) or more if an increased density is applied. This support is on the basis that affordable housing policy can be delivered via a range of agreed tenures including discounted sale, rent and self build.

### Proposed Change ‘B’

10.3 A policy change is also proposed to specify required percentages of other types of housing within new developments. The proposal would require a percentage requirement for family housing and Private Rented Sector. The Choices document does not specify what these percentages would be but the policy is generally supported in principle.

## Section 11 – Building our new homes and infrastructure (‘Choice 12’)

### Part A – How many new homes does Edinburgh need?

#### Demand evidence base

11.1 It is noted that housing land requirements for City Plan 2030 are to be derived from the Housing Need and Demand Assessment from the discontinued Proposed SESplan 2 (HNDA2 – approved in 2015) and specifically HNDA2’s ‘wealth distribution’ scenario (the mid-level projection) which supported the Proposed SESplan2.

11.2 This approach is in line with the “Joint Housing Position Statement” agreed by the SESplan authority in September 2019 which set out that whilst SESplan1 (and its housing land requirement to 2024) should be the basis for assessing planning applications/appeals (supported by planning appeal decision PPA-400-2097 at Bathgate), material weight should be applied to HNDA2 having been declared ‘robust and credible’ in the preparation of SESplan2 and providing the most up to date evidence base. The Position Statement also notes that whilst SESplan2 was rejected for other matters, housing requirements were not specifically rejected.

11.3 The utilisation of HNDA2 is also the stated position of other SESplan authorities, including East Lothian, West Lothian and Fife.

11.4 However, the proposed approach is potentially contrary to the Housing Minister’s letter of 16th May 2019 to the SESplan authority which stated “authorities should continue to work towards preparing local development plans for their areas that are consistent with SESplan1”. The use of HNDA2 to set housing land requirements has not explicitly been supported by the Scottish Government.

11.5 Given that the Planning (Scotland) Act 2019 provisions will set out a change to how housing land requirements are set (to be via National Planning

Framework 4), a robust approach is required until new national-led targets are known (not expected to be until 2022).

#### City Plan 2030 Approach

11.6 The **MIR preferred option provides for a residual Housing Supply Target (HST) of 22,600 market units and 20,800 affordable units for the period 2019-32**. As set out in the Table 1 of the MIR’s supporting Housing Study, this is based upon utilising the full HNDA2 demand figure for market housing (31,772 units required between 2012-32 minus 9,184 completions to 2019 leaving balance of c.22,600).

11.7 For affordable, the 2012-32 demand is 49,913 units minus 5,327 completions to 2019 leaving a balance of 44,586 units. The MIR sets a target of 20,800 units based upon deliverability factors and the Council’s commitment to delivering 20,000 affordable homes by 2027 plus an element of rolled forward provision to 2032.

**11.8 Notwithstanding affordable delivery factors, this does mean that City Plan 2030 would provide for 25,000 fewer homes overall than HNDA2 demand outlined.**

11.9 On an annual average basis, HNDA2 (wealth distribution scenario) outlines demand for 1,589 market homes and 2,496 affordable homes per annum between 2012-32. Allowing for completions to 2019, the residual targets to 2032 are 1,737 market homes and 3,429 affordable homes (the latter being adjusted to c.1,600 per annum by the MIR). It is noted that proposed market targets are higher than the post-examination report version of Proposed SESplan 2 (targets of 994 market homes and 1,607 affordable homes per annum).

11.10 In terms of past delivery, Edinburgh’s 2019 Housing Land Audit illustrates that between 2001-18, market completions exceeded the proposed annual residual target (1,737) on 9 occasions (over 2,000 units on 5 occasions) indicating there is scope for the private sector to deliver at a higher rate than proposed if required. It is noted that the



proposed affordable annual target (c.1,600) has not been achieved in this same period.

11.11 Tables 1 and 2 of the MIR set out the HST for the preferred (A) and alternative (B) options. For the **MIR preferred option**, this is based on the following:

- All-tenure HST of 43,400 homes for the period 2019-32 (22,600 market and 20,800 affordable)
- Current land supply of 30,164 homes (Edinburgh HLA19, including 22,696 effective and 7,468 constrained)
- **'Additional land to find' for 17,600 homes** (providing 10% flexibility, i.e.  $43,400 + 10\% = 47,740 - 30,164$  supply = 17,576)

11.12 The **MIR alternative option** increases the market housing target to accord with the higher HNDA2 'strong growth' scenario:

- All-tenure HST of 52,800 homes for the period 2019-32 (32,000 market and 20,800 affordable)
- Current land supply of 30,164 homes (Edinburgh HLA19, including 22,696 effective and 7,468 constrained)
- **'Additional land to find' for 27,900 homes** (providing 10% flexibility, i.e.  $52,800 + 10\% = 58,080 - 30,164$  supply = 27,916)

11.13 The alternative option provides greater scope for the private sector to assist with the overall shortfall against HNDA2 (wealth distribution scenario) demand. The proposed 32,000 market homes target equates to 2,460 per annum which, although higher than achieved in recent years is less than the agreed 2019 Housing Land Audit programme average for next five years (2,750) and allows for a more positive combination of meeting HNDA 'strong growth' demand for market delivery to off-set the fact that proposed affordable targets are only c.50% of the lowest HNDA demand figures ('steady recovery'). It also allows for flexibility in tenure delivery across overall targets which will

become more of a factor over the next decade with increase range in housing delivery models.

11.14 **Option B is supported in order to provide a positive growth basis for Edinburgh over the next decade and maximise flexibility in housing delivery.**

## Part B – Who will deliver these homes?

11.15 It is noted that the Council wish to deliver their preferred option (land requirement for 47,000 homes between 2019-32) via a combination of existing land supply contained within the Housing Land Audit (providing 30,100 homes on a mix of brownfield and allocated greenfield sites) and sites identified within the supporting Housing Study (providing land for 16,900 new homes).

11.16 As noted within the Housing Study, this option would require the Council (and public sector partners) to deliver a greater proportion of the required affordable housing target (10,500 units versus 10,300 units delivered via consented and new Affordable Housing Policy sites).

11.17 As set out in response to Part A above, **it is considered the net housing land requirement should accord with the MIR alternative option (total land required for 58,000 new homes). Allowing for existing land supply within the Housing Land Audit (30,100) this results in a net requirement to identify land for 27,900 new homes** (as set out in MIR Table 2).

11.18 The Housing Study notes that the additional market housing within this alternative option would deliver a greater proportion of the affordable target via the Affordable Housing Policy (an extra 5,000 affordable homes). The alternative option is supported.

## Part C – How to deliver our new homes in the most sustainable way?

11.19 The **MIR's preferred option** is Option 1, which requires **land for 17,600 homes to be identified within the urban area**. The Council note the specific requirements to implement this approach, which present several risks:

- The Council require to “rapidly intervene” to deliver these urban sites on Council or other public sector land. Given the need to secure agreement with other public landowners, a significant risk of delivery timing exists.
- New and significant changes to infrastructure are required (schools, healthcare, transport). It is appreciated this is a risk attached to any growth option but the urban-only option potentially carries a greater risk of having to find additional capacity in existing schools and medical practices rather than scope for more appropriate new-build options on urban extension sites.
- This option requires the use of a significant area of land zoned for employment and the Council state a requirement to intervene to deliver 275 hectares of employment land as part of mixed-use developments or identify replacement sites elsewhere. This is a high risk component given the ten year timeframe.
- Finally, the Council note that this option **“may require a significant CPO programme to ensure land comes forward”**. The added risks of relying on the CPO process (time, cost, conflict) raises significant concerns that this option is deliverable within the LDP period.

11.20 The Council set out two further options to deliver the housing requirement. **Option 2 proposes to deliver the higher 27,900 requirement on greenfield sites** with large planned green belt release. The only risk associated with this option is the requirement for significant new infrastructure but given the other fundamental constraints to Option 1, this would represent a more feasible approach.

**11.21 Option 3 puts forward a blended approach of utilising both urban and greenfield sites to deliver the Council's preferred 17,600 housing land requirement.** The MIR proposes that approximately 11,000 homes would be delivered on urban sites and approximately 6,600 homes delivered on greenfield land. Risks attached combine the constraints of both Option 1 and 2.

11.22 The Housing Study includes both urban area and greenfield site assessments in support of these options, which are addressed below.

11.23 It is noted that Scottish Planning Policy and approved spatial strategy for South-East Scotland promotes the efficient re-use of land and guides development to urban areas and key strategic development areas (including West and South-East Edinburgh which have both accommodated greenfield development in the current Local Development Plan).

11.24 However, the fundamental risks highlighted to concentrate delivery of all new housing to urban areas, as preferred by the Council, illustrate that this is not a realistic strategy. The number of hurdles to be overcome present a highly likely scenario that housing targets are not achieved and much needed homes to accommodate Edinburgh's existing residents and growth aspirations are not delivered.

11.25 The tightly constrained nature of Edinburgh's physical boundaries present clear spatial strategy challenges and the significant levels of new development already planned for North-West and South-East Edinburgh present practical difficulties in directing all potential greenfield release to these areas.

**11.26 If Edinburgh is to deliver its homes and meet the higher land requirement (27,900) set out above, an amended option comprising a combination of urban land and a greater range of greenfield land release is required. The following section reviews the Council's urban site assessment which sets out that achievable capacity may be in the region of 6,900 to 11,000 homes. This would leave a residual requirement to identify sufficient**

**greenfield land to accommodate between 16,900 and 21,000 new homes in the LDP period.**

**11.27 It is considered that this amended option presents a more realistic approach to deliver growth which places less pressure on land assembly and allows for growth in the most sustainable locations (whether based on existing infrastructure or potential for new deliverable infrastructure in the LDP timeframe).**

## Urban Site Assessment

11.28 Part 2a of the supporting Housing Study provides an assessment of urban sites capable of delivering the housing land requirement.

11.29 It is noted that the first part of the urban site assessment generated a list of 255 sites, following application of a number of factors including avoiding double-counting HLA sites, avoiding protected employment sites, open space, Green Belt/Countryside and sites with international/national natural heritage designations. The assessment was based on identifying sites of over 0.05 hectare (5 unit minimum). These sites were then assessed based on current use, environmental constraints, public transport accessibility and known developer interest/planning history, which reduced the list to 142 potential sites considered to have medium to high potential for development (see **Figure 13**).

11.30 To determine associated potential housing numbers, the assessment applied a range of densities to these identified sites; high (175-275/dph), medium-high (100-175/dph), medium-low (60-100/dph) and site specific where listed buildings or other constraints were identified. These density

ranges are supported by examples within Appendix I. The assessment notes an average urban area density of 97 units per hectare over the past decade in Edinburgh. This estimate of site density resulted in a total range of between 16,900 to 27,000 units across all 142 sites.

11.31 This assessment is essentially a calculation of potential windfall development that will contribute to Edinburgh's housing land requirement over the LDP period to 2032. Whilst there is an element of the identified supply that will come forward as allocations, the majority of identified sites appear to be speculative without stated positions on land ownership/control. As such, **it is considered that this potential supply should be treated on the basis of previous windfall completions within Edinburgh with an extra allowance based on assuming the Council will be focusing resources on release of more of this urban land.**

11.32 As set out in the 2019 Housing Land Audit, Edinburgh's **recent windfall completions are in the region of 420 per annum**. Based upon the projected period between 2019-32, this would provide **scope for approximately 5,500**

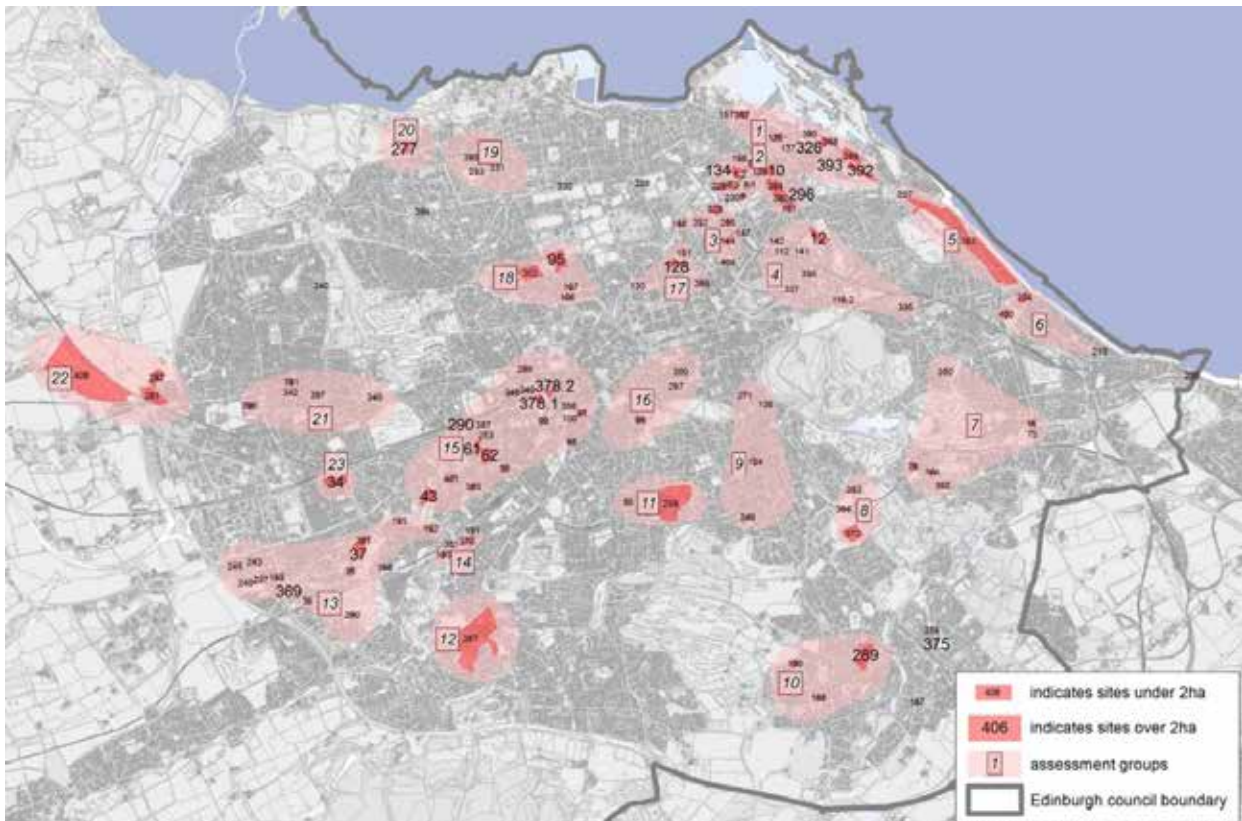


Figure 13 - Housing Study Urban Sites



**completions from the identified sites. If the windfall completion rate could be doubled through focusing resources on land assembly and incentives, a rate of double that achieved in recent years (say 840 per annum) would provide scope or approximately 11,000 homes in the period.**

11.33 In reviewing specific sites identified within the Council's assessment, there are a **number of larger multiple-ownerships which would be particularly challenging** to deliver within the ten year LDP timeframe. For example, the following eight sites are proposed to deliver between 3,589 and 5,908 units depending on density and all require land assembly/CPO.

- Area 1, Site 392 – Carron Place (industrial/retail), proposed 677-1064 units
- Area 2, Site 384 – Jane Street (industrial), proposed 418-731 units
- Area 4, Site 12 – St.Clair Street (industrial), proposed 266-465 units
- Area 5, Site 383 – Seafield (industrial/retail), proposed 1000-1500 units
- Area 13, Site 37 – Murrayburn Road (industrial), proposed 306-535 units
- Area 15, Site 61 – Stevenson Road (industrial), proposed 204-357 units
- Area 15, Site 62 – Gorgie Road East (office), proposed 336-588 units
- Area 18, Site 95 – Crewe Road South (mixed-use), proposed 382-668 units

11.34 Furthermore, in terms of **timing risk on release of sites from public or quasi-public** landowners, there are 3 sites within MOD control (920-1001 units) and 5 sites within NHS control (1296-1827 units) which have deliverability risk within the LDP timeframe.

11.35 As noted by the Council, the urban only

approach incorporates extensive employment land (outwith specific protected areas) with **275 hectares of land to be used for housing requiring additional employment land to be identified elsewhere.** Given the 'preliminary' nature of the urban site assessment, it is safe to assume that only a proportion of these employment sites will potentially be released for housing during the LDP timeframe.

11.36 **Overall, in terms of site scope for housing, a more realistic assumption of capacity would be based between a range of 'existing windfall plus 25%' (approximately 6,900 units) and 'double recent windfall' (approximately 11,000 units).**

11.37 As highlighted in response to 'Choice 2', the reasoning behind the **application of high-density targets across Edinburgh is appreciated but also raises the question of lack of housing type choice.** Urban sites will generally provide flatted development with only small element of housing with private gardens. At the proposed lower density range (60-100/dph), the types of developments were highlighted in response to Choice 2, i.e. 69 dph 21st Century Homes at Gracemount (75/25 flats/houses split) and 72dph at Calder Road, Sighthill (80/20 flats/houses split). To generate more family accommodation a lower density is required (around 40 dph provides scope for 50/50 houses/flats split). Careful consideration is required to ensure a range of housetypes are provided and that households requiring more rooms and/or outside space are not excluded from Edinburgh over the coming decade through lack of supply. This would result in families having to find homes in surrounding areas with resultant loss of community mix.

11.38 If amending the proposed 'medium-low' density target from 60-100 dph to 40-100dph, this **density amendment to allow for more family homes would have a further associated impact on site capacity across identified urban sites.**

## Greenfield Site Assessment

11.39 Part 2b of the supporting Housing Study provides an assessment of greenfield sites with development potential which still contribute to spatial strategy aims, minimise impact on landscape character and make best use of infrastructure.

11.40 The assessment includes 134 sites, both within and outwith Strategic Development Areas, with exclusions including key protected open space (Holyrood Park and Pentland Hills Regional Park), sites assessed via previous LDP process and now allocated for development, and, areas covered by difficult topography/transport/energy/infrastructure (see **Figure 14**).

11.41 The site assessment was based on the following broad factors:

- If site is within a Strategic Development Area (SDPI)
- If site supports active travel by walking to local services and employment, and accessing the wider cycle network
- If site supports public transport use by existing accessibility or future improvements to public

transport corridors

- If site has community infrastructure capacity, measured by existing and committed school capacity
- If site has landscape capacity through landscape character assessment
- If site is of value for development of the strategic green network as an area of landscape
- If site is at risk of flooding, based on SEPA medium-high flood risk areas of importance for flood management data

11.42 The assessment identifies **five areas as having potential for accommodating the housing land requirement either in part or in full** (included as alternative MIR options), namely South-East Edinburgh, West Edinburgh, Kirkliston, East of Riccarton and Calderwood (see **Figure 15-25**).

11.43 **The ability for these five areas to accommodate the necessary scale of development within the LDP timeframe is contested and it is considered additional greenfield sites should be released as part of the recommended combined urban/greenfield growth strategy.**

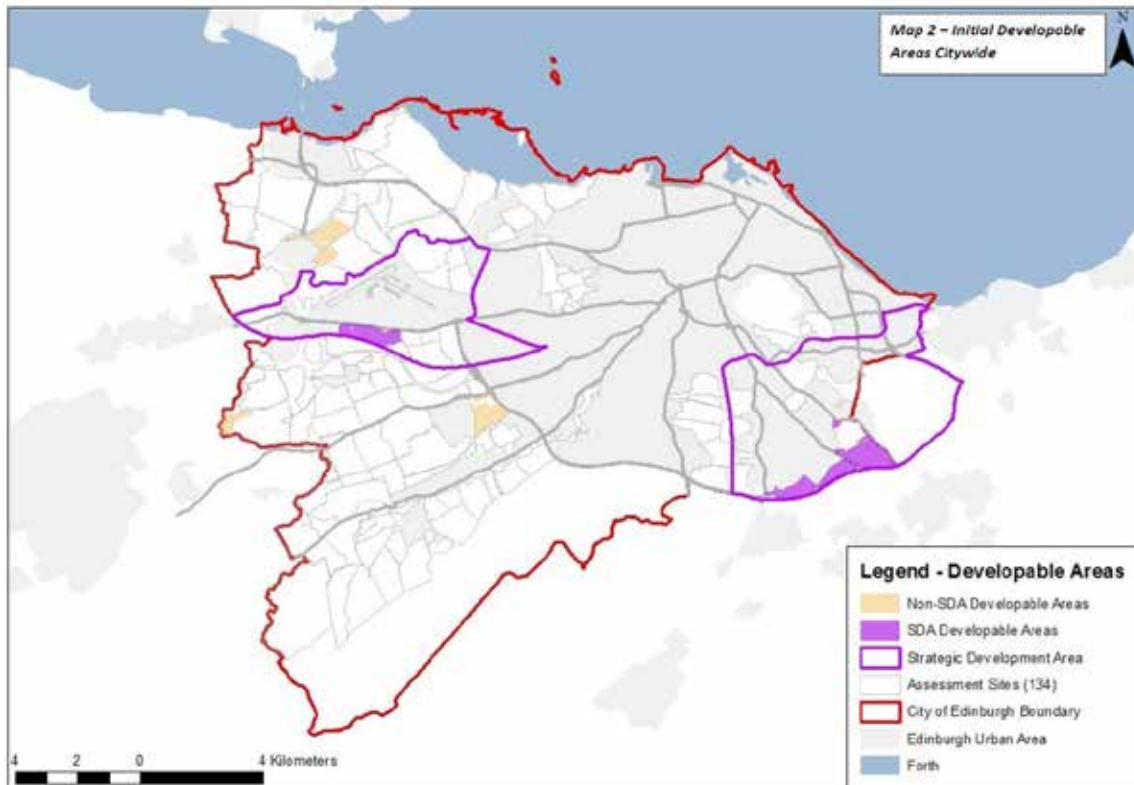


Figure 14 - Housing Study Greenfield Developable Areas

11.44 Site assessments for the five identified greenfield sites are summarised in **Table A** (Page 28).

11.45 It is noted that all five locations are assessed negatively for walkable accessibility, active travel, public transport accessibility, school capacity and landscape impact (with exception of East of Riccarton). However, all five locations have been supported as potential greenfield release locations.

11.46 It is also noted that the **MIR does not provide specific site capacities for the identified greenfield sites**. As such, the table also provides an estimate of potential site capacity given identified constraints and delivery timescales.

11.47 Notwithstanding overall site capacity, it is clear the scope for contribution within the LDP period to 2032 is restricted by likely planning lead-in timescales and maximum annual output per site.

11.48 As illustrated within the table, **it is estimated that the sites have scope for around 1,350 completions each within the timeframe (excluding Calderwood which is**

**considered to be longer-term** and therefore unlikely to deliver any units within the LDP period given its reliance on West Lothian secondary school arrangements). As such, it is **estimated the four remaining sites would provide for c.5,400 units within the LDP period**.

11.49 Based on the overall housing land requirement of 27,900 noted above minus contributions from urban sites (6,900 to 11,000) and greenfield sites (5,400) there would remain **a residual requirement to identify land for between 11,500 to 15,600 units**.

11.50 Given that all large-scale sites (urban or greenfield) will face the same challenges (planning lead-in times, infrastructure delivery and maximum output per annum), it is considered that **Edinburgh must allocate a wider range of sites to meet targets**.

11.51 As set out below, it is estimated that any site coming forward through the emerging City Plan 2030 will be restricted in terms of overall output and **sites for up to 1,500 units provide the optimum size to enable completion within the LDP period**.

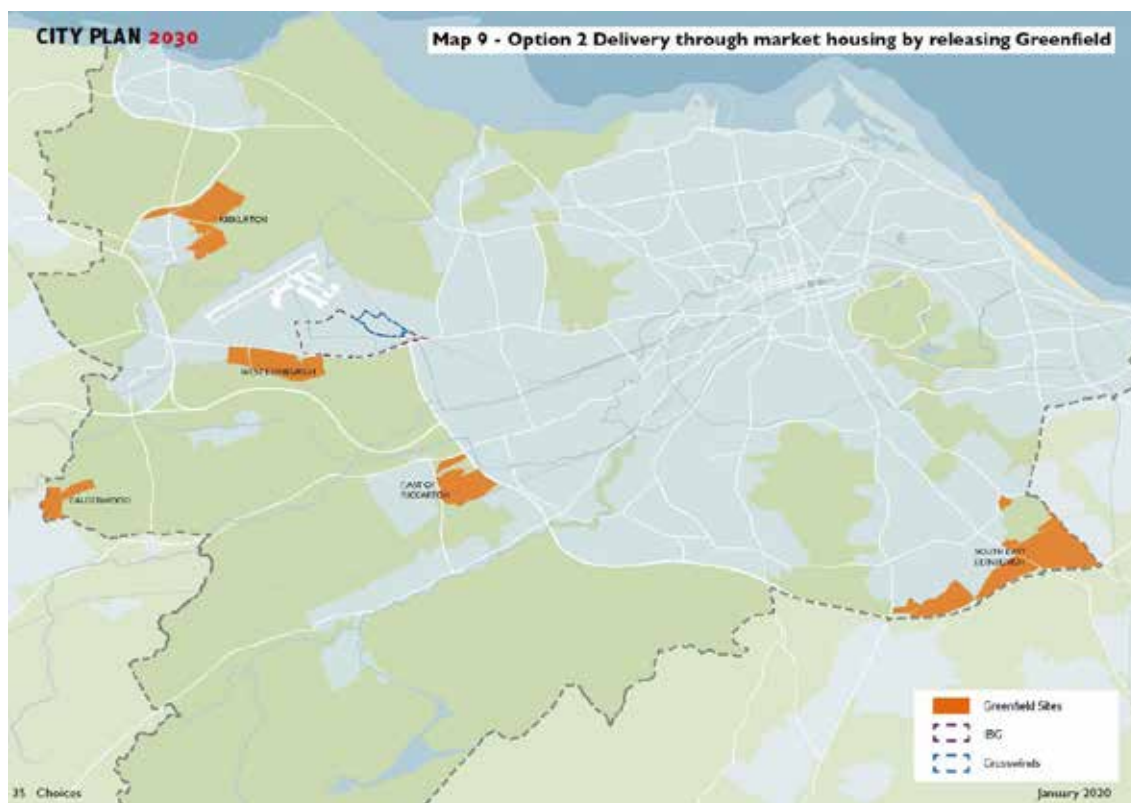


Figure 15 - Housing Study Preferred Greenfield Sites

Site/ Criteria	South-East Edinburgh (South of Lang Loan, South of Gilmerton Station Road, Drum South, Drum North, East of Burdiehouse Road)	West Edinburgh (Norton Park)	Kirkliston (Craigbrae, Conifox, North Kirkliston, Carlowrie Castle – part)	East of Riccarton	Calderwood (Bonnington – part, Overshiel)
Within SDA?	Yes	Yes	No	No	No
10min walk / 800m to local services	Partially – can be provided, part Yes existing to east	Partially – PFS shop, potential IBG development	Partially – improved linkage required	Partially – can be provided	Partially – can be provided, plus adj Calderwood
30 min walk / 2400m to employment clusters	No (except Drum North, yes)	Partially – poor walking environment on A8	No	Partially – access impeded by poor walking environment	No
Links to 'QuietRoute' and National Cycle Network	No / Partially – planned improvements	Partially – poor quality cycling environment on A8	No	No – access impeded	No
Can Active Travel be supported through appropriate intervention	No/Partially	Partially – limited existing access, interventions required	No – poor access	No – new bridge over bypass required	No – poor access
Public Transport accessibility (ESTS)	No	No	No	No	No
Link to identified PT intervention project	No / Partial (1km+) / Yes (Old Dalkeith Rd side)	Yes – intervention to serve A8 corridor (bus rapid transit)	No	No – intervention not deliverable within LPD period	No
Primary School capacity	No	No	No	No	No
Secondary School capacity	No	No	No	No	No
Can either be improved with intervention	Partially - new primaries and secondary required	Partially – new primaries and secondary required	Partially – new primaries and secondary required	Partially – new primary, potential to change catchment to Wester Hailes	Partially – new primaries and secondary required (potentially linking with WLC)
Impact on identity, character and landscape setting of settlements and avoid coalescence	No (Lang Loan / Gilmerton St Rd) – visible from bypass Partial (Drum North) Yes (Drum South) – screening possible	Partially – development potential on west of site adj Ratho Station. Eastern area development obstructs Pentlands views	Partially – part visual containment but part open landscape. SE area breaches natural boundary.	Yes – lack of contribution to setting of city	No – sensitive landscape
Avoid loss of landscape identified for strategic green network	Partially - adj green network	Partially – adj green network opportunity to potential impact	Partially – part within identified network area	Partially – within potential green network area	Partially – adjoins Jupiter Artland

Avoid medium-high flood risk areas	Yes	Partially – part of site within risk area	Yes	Partially – part of site within flood risk area	Yes
Summary	CEC consider suitable despite partly highly visible, pylon line through site and limited active travel / PT accessibility on western part.	CEC consider suitable despite poor walking/cycling environment on A8 and impact on Pentlands views.	CEC consider suitable despite poor accessibility and open landscape.	CEC consider suitable despite poor walking/cycling connections environment, flood risk, breach of bypass barrier, power lines constraint.	CEC consider suitable despite poor accessibility and landscape impact. Potential as extension of adjacent Calderwood (West Lothian).
Gross Development Area*	Approx. 200 ha. Including major pylon line and transport infrastructure. Refer to Figure X	Approx. 90 ha. Including access to Norton House, flood zone, roads (refer to Figure X & X)	Approx. 114 ha. Including rail infrastructure, nature conservation site, roads (refer to Figure X)	Approx. 80 ha. including flood zone, scheduled monument and pylon lines (refer to Figure X & X)	Approx. 36 ha. Including (refer to Figure X & X)
Potential Net Developable Area (est.50%)	100 ha.	45 ha.	57 ha.	40 ha.	18 ha.
Potential Site Capacity**	6,500	2,925	3,705	2,600	1,170
Gross Density Check***	33dph	33dph	33dph	33dph	33dph
Deliverable within LDP period****	1,350	1,350	1,350	1,350	0?
Site Comment	Major pylon line. Significant landscape impact visible from bypass. Multiple landowners. Integrated transport approach required. Scale deliverable in LDP timeframe?	Listed buildings / private houses on site edge to be retained. Active Intensive Livestock Unit within site. Coalescence with Ratho Station.	South-east part of site breaches clear boundary, north-east extends into open landscape. Vehicular access options limited.	Site merges Riccarton with city, 2 pylon lines, scheduled monument and flood zone constraints.	Site on edge of Edinburgh boundary and would form an extension of adjoining Calderwood (West Lothian) development, which has 1600 units remaining post-2025 per WL HLA18.

\*estimate based on identified constraints in Greenfield Site Assessment and MIR Site Summaries

\*\*assumption of 50% net developable area for greenfield sites, then apply 65dph as proposed by Choices document as minimum density.

\*\*\*as comparison, existing LDP greenfield sites average a gross density of 22dph (9595 units on 428.7 hectares)

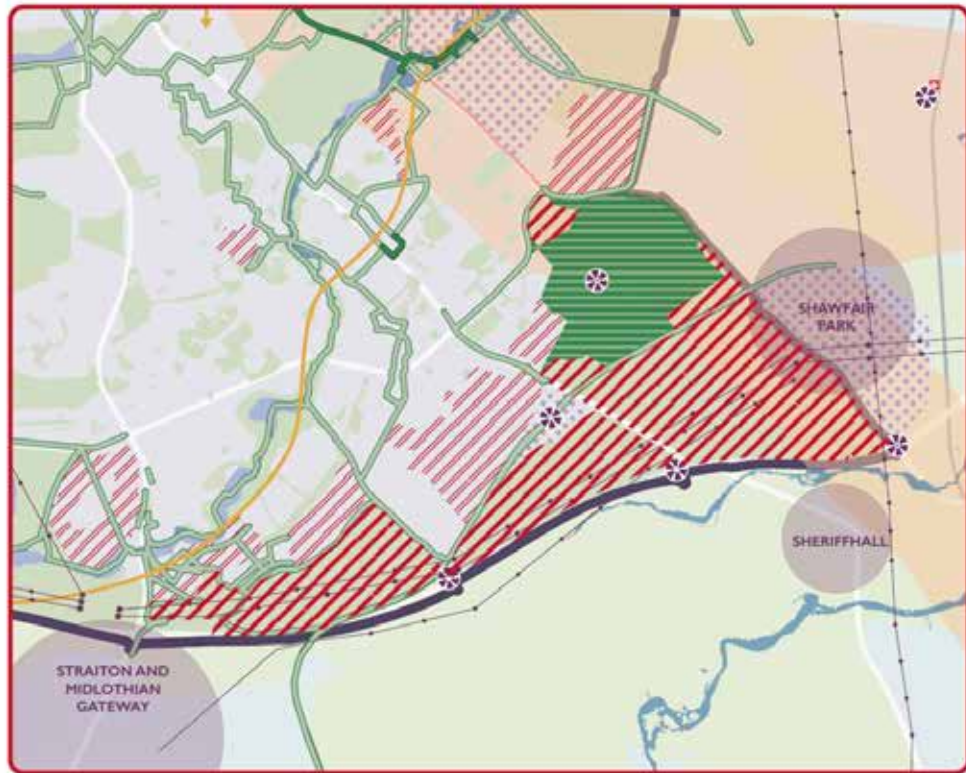
\*\*\*\*assume maximum private output of 150 units per annum for 9 years (2023/24 to 2031/32) allowing for planning approval post-LDP adoption with 3 developers on-site (based on review of greenfield site programming in HLA19)

Table A - Greenfield Site Assessment Summary



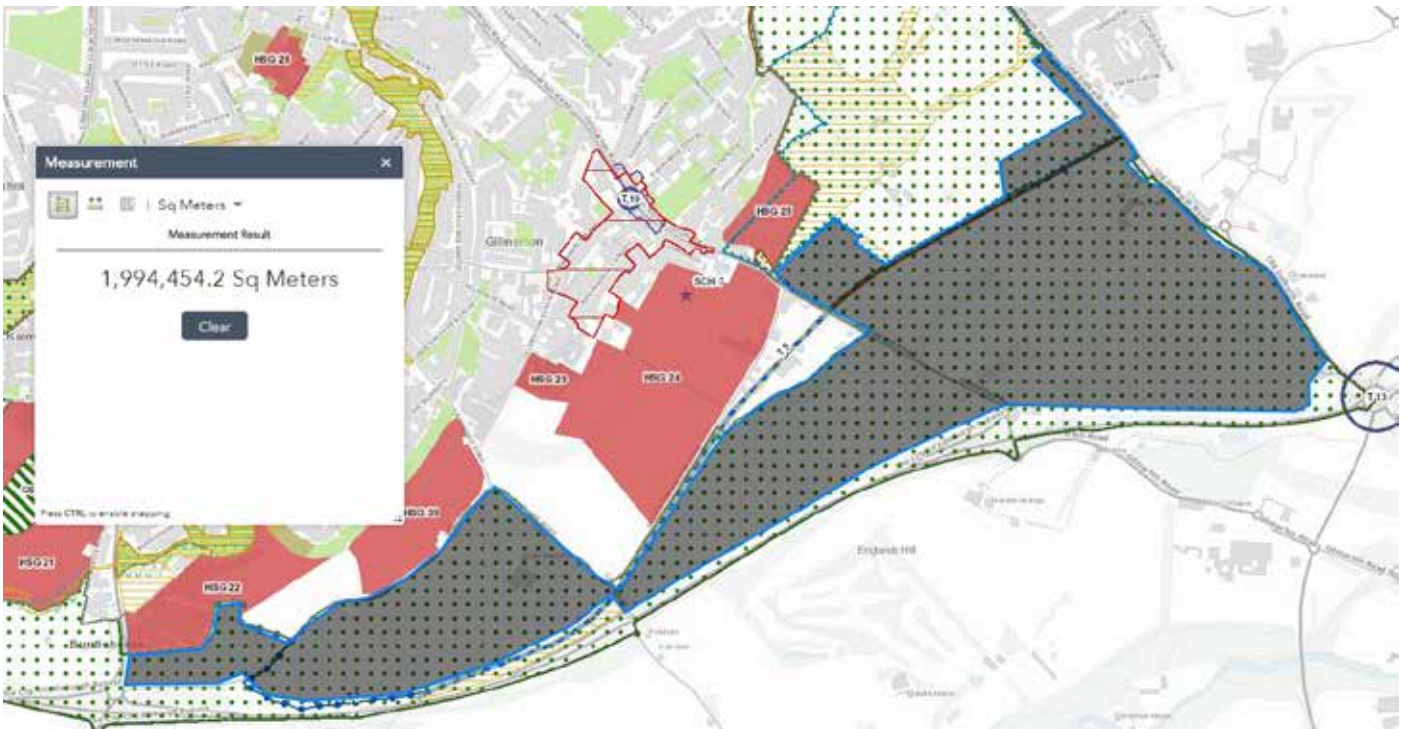
Map 10 - Area 1  
South East Edinburgh

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



Choices

January 2020

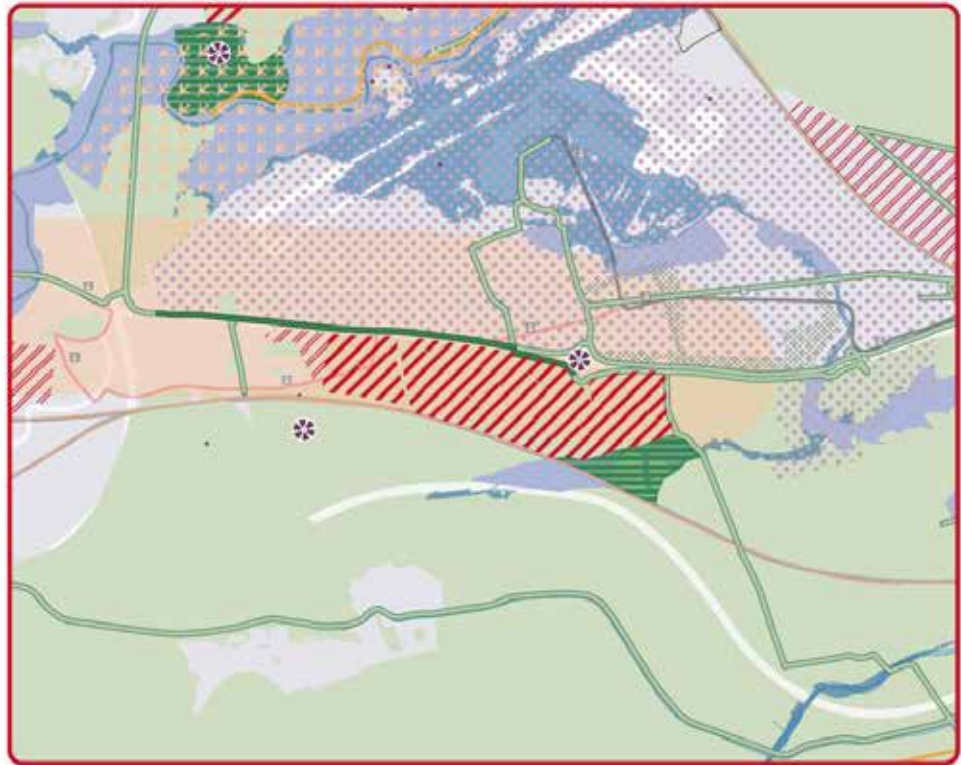


Figures 16&17 - South East Edinburgh  
(MIR Site Brief and LDP-base area calculation)



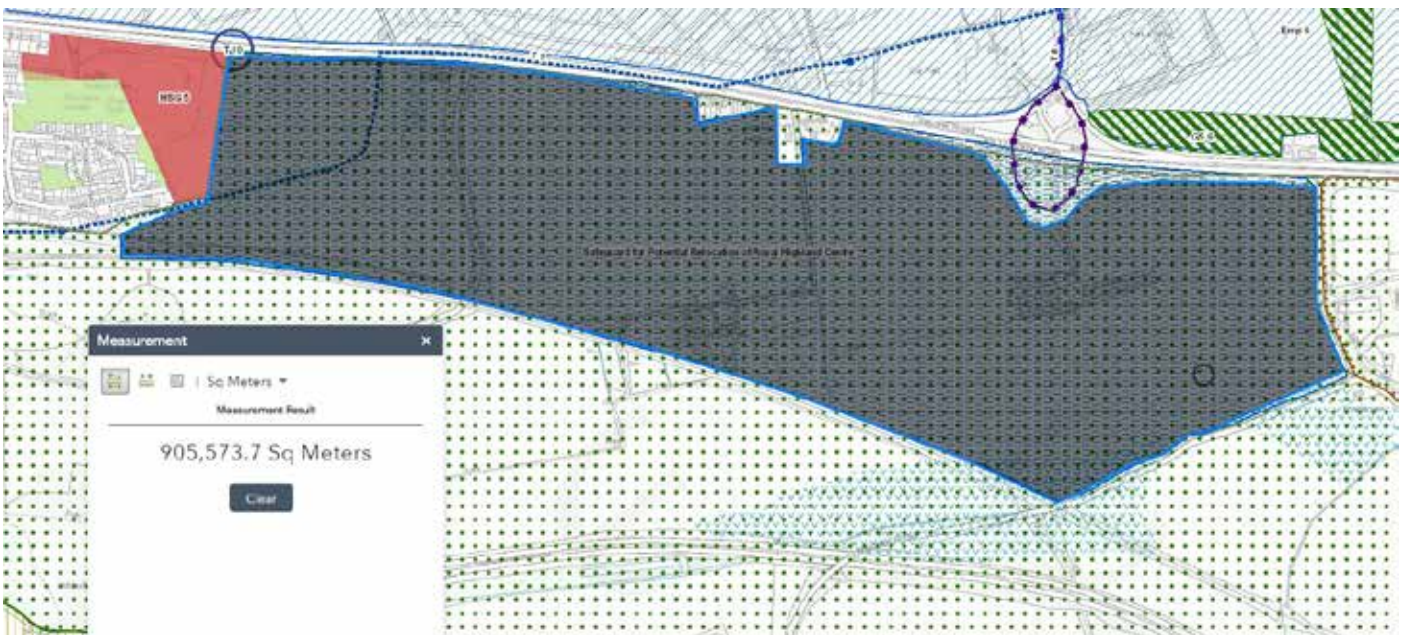
Map 11 - Area 2  
West Edinburgh

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



Choices

January 2020

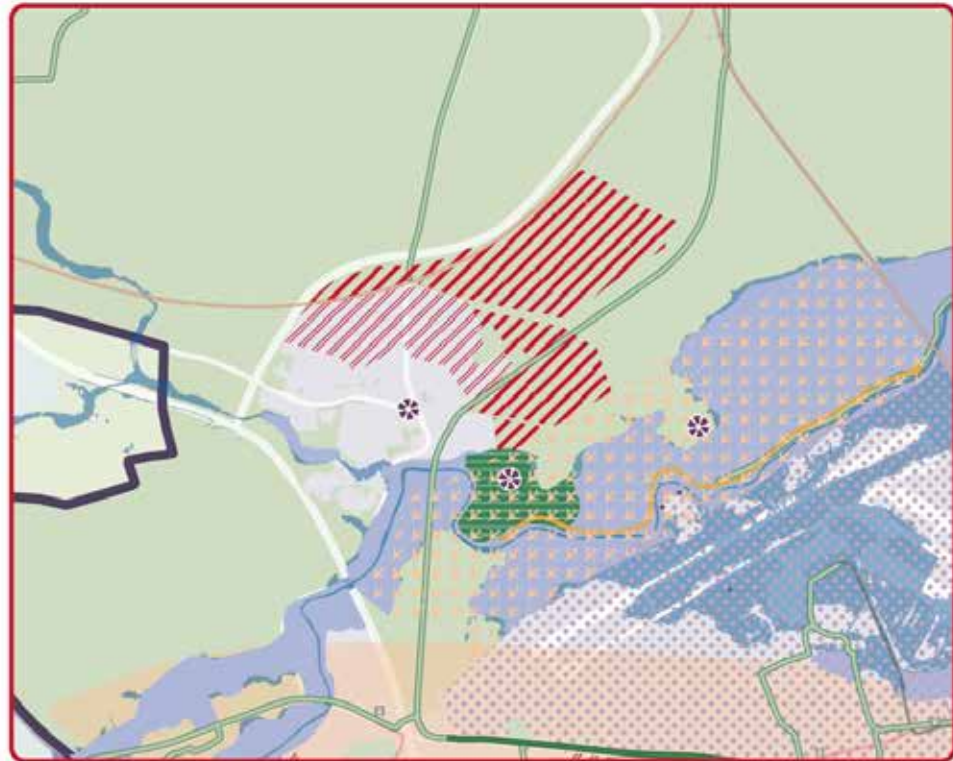


Figures 18&19 -West Edinburgh  
(MIR Site Brief and LDP-base area calculation)



Map 12 - Area 3  
Kirkliston

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



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Figures 20&21 - South East Edinburgh  
(MIR Site Brief and LDP-base area calculation)



Map 13 - Area 4  
East of Riccarton

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



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Figures 22&23 - East of Riccarton  
(MIR Site Brief and LDP-base area calculation)



Map 14 - Area 5  
Calderwood

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



Choices

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Figures 24&25 -Calderwood  
(MIR Site Brief and LDP-base area calculation)

## Hatton Village – Site Assessment

11.52 The proposed Hatton Village site is located within the wider Easter Hatton Mains site assessment area within the Council's Greenfield Site Assessment. It is important to note that the Easter Hatton Mains assessment site included land within a Special Landscape Area which the Hatton Village proposal has specifically avoided. Please refer to **Appendix I** which sets out a Planning Policy Overview relating to the new village proposal and **Appendix 5** which provides an Environmental Impact Assessment in support of the proposal.

11.53 **Table B** (Page 35) provides an amended site assessment, noting the Council position on each point and providing an amended comment based on the proposals and supporting studies that have been undertaken.

11.54 This assessment demonstrates that the site compares favourably within the five identified greenfield locations put forward as alternative housing locations by the MIR. In particular:

- **walkability to services will be enabled with a new village hub**
- **the site adjoins a key active travel route (A71) with cycle enhancements improving existing linkage to Hermiston/West Edinburgh**
- **there is existing public transport accessibility (A71 express services to city centre) which can be enhanced via the identified measures within the Edinburgh Strategic Sustainable Transport Study (delivery within LDP timeframe is achievable for bus rapid transit)**
- **Capacity exists within catchment primary and secondary schools in the short-medium term, allowing for a critical mass of housing to be occupied prior to extended capacity (potential primary school on-site with site reserved in masterplan)**
- **Landscape impact can be mitigated as**

**set out in supporting studies with the site avoiding the Special Landscape Area and other designations**

- **Proposed development area avoids flood risk zones and provides an achievable surface water drainage strategy**

11.55 **The Hatton Village site would provide for approximately 1,200 new homes based on current density (c.35dph) with scope for over 2,000 homes if applying the higher 65dph density being proposed by the Choices document for new sites.**

11.56 **The proposed scale of development and associated infrastructure interventions are deliverable within the LDP period.**

11.57 **Hatton Village can be a sustainable new community for Edinburgh and should be allocated within the Proposed City Plan 2030 to meet identified housing land requirements.**

11.58 **A full suite of supporting documents are included as appendices to this Representation which demonstrate the deliverability of the proposal.**

11.59 **Inverdunning (Hatton Mains) Ltd welcome the opportunity to discuss the proposal further with City of Edinburgh Council Officers and Members.**

Site/ Criteria	Hatton Village (Easter Hatton Mains - <u>part</u> )
Within SDA?	CEC - No Agree
10min walk / 800m to local services	CEC – No Disagree, amend to Partially – can be provided (proposal includes new village hub), currently c.1400m from centre of site to services within Ratho to north.
30 min walk / 2400m to employment clusters	CEC – No Agree but A71 transport links allow for direct access to West Edinburgh employment centres.
Links to 'QuietRoute' and National Cycle Network	CEC – No Disagree, amend to Partially – currently c.1500m from NCN754 to north (Union Canal). Planned improvements include A71 cycle 'super highway' which would run along site frontage providing access to Hermiston P&R and West Edinburgh.
Can Active Travel be supported through appropriate intervention	CEC - No Disagree, amend to Partially – the planned A71 (Livingston to West Edinburgh) cycle 'super highway' runs along frontage of site and development can enable an off-line path (including walking) and contribute to this wider policy aspiration.
Public Transport accessibility (ESTS)	CEC - No Site is located on A71 arterial bus route into city centre
Link to identified PT intervention project	CEC - No Disagree, amend to Partially – within ESTS Corridor 8 (West of Hermiston) transit options study area, tram or bus rapid transit options, latter being capable of implementation within LDP period to link with West Edinburgh.
Primary School capacity	CEC – stated site within West Lothian school catchment Disagree, amend to Partially – refer to supporting Education Impact Statement. Scope for up to 500 units to be accommodated within extended Dean Park PS prior to new school/capacity required.
Secondary School capacity	CEC – stated site within West Lothian school catchment Disagree, amend to Partially – refer to supporting Education Impact Statement. Scope for up to 500 units to be accommodated within extended Balerno HS prior to new capacity required. School currently subject to CEC investigation in to extension/replacement.
Can either be improved with intervention	CEC - No Disagree, amend to Yes
Impact on identity, character and landscape setting of settlements and avoid coalescence	CEC - No Disagree, amend to Yes – the Hatton Village site is outwith the Special Landscape Area and is contained within the landscape – refer to supporting LVIA and EIA documents. Impact is only in close proximity to site. Proposed landscape design further mitigates impact. As new village, proposal avoids coalescence or impact on setting of existing settlement.
Avoid loss of landscape identified for strategic green network	CEC - Yes Agree – outwith green network opportunity areas. However, scope existing to create significant new greenspace as part of village which would be accessible to wider West Edinburgh through existing and improved bus and cycle connections on A71/north to Ratho.
Avoid medium-high flood risk areas	CEC - Yes Agree – small flood area associated with minor burn on northern edge of site incorporated within design proposals.
Summary	CEC considered wider Easter Hatton Mains site to be unsuitable due to poor accessibility, community infrastructure capacity, highly visible ridge landscape and rural character.  The supporting studies contained within the Representation set out a new village on the eastern part of this wider area and addresses accessibility/transport improvements, education capacity and landscape capacity/mitigation. Site avoids the 'highly visible ridge landscape' to west.  Site should be supported for new village.
Gross Development Area*	58.5 ha. with no physical restrictions other than existing road bisecting site, tree-lined field boundaries and surface water drainage requirements. Refer to Figure X
Potential Net Developable Area	32 ha. (calculated via masterplan exercise, equating to 55% gross area) with c.3 ha. of other hard surface (roads) and c.23 ha. of greenspace/drainage areas.
Potential Site Capacity**	c.1,200 based on current masterplan at c35dph with density range (scope for c.2,000 units at CEC preferred 65dph if deemed appropriate density for location)
Gross Density Check***	20dph (based on 1200 units), comparable to LDP sites Broomhills (22dph), Cammo (23dph) 34dph (based on 2000 units)
Deliverable within LDP period****	1,200+ (assuming 2023/24 first completions)
Site Comment	Site forms new village but accessible based on proposals for A71 corridor (enhancing existing bus service to provide rapid transit to West Edinburgh, plus cycle super highway), creates new hub (local centre), site is technically developable and effective (based on full suite of supporting studies), site does not require significant roads infrastructure to allow start, education infrastructure available in short-medium term with options for long term capacity, landscape impact can be mitigated, density range can be provided and full site can be delivered within LDP period.

Table B - Hatton Village Site Assessment Summary

## Section 12 – Supporting inclusive growth, innovation, universities and culture and Delivering West Edinburgh (‘Choice 13 & 14’)

12.1 City Region Deal funding for South East Scotland will provide a significant financial investment in Edinburgh’s economic growth over the next 10-15 years. The Council wish to focus this investment on Innovation, Skills, Transport, Culture and Housing themes.

### Choice 13 Proposed Change ‘A’

12.2 The Council wish to create a new policy to support social enterprise, culture and tourism, innovation and learning and the low carbon sector which contributes to ‘good growth’ for Edinburgh. There are five specific areas to be supported which include City Centre transformation projects, festivals and cultural offering, university and college innovation and learning development, BioQuarter and West Edinburgh. This approach is supported on the basis that housing is identified as key infrastructure to

support this growth, with associated funding focus on key transport and education infrastructure.

### Choice 14 Proposed Change ‘A’

12.3 West Edinburgh is identified as a nationally significant location in transport and economic terms. The Council wish to support the best use of public transport infrastructure in West Edinburgh with a £36m funding package to support sustainable, inclusive growth.

12.4 The Council have outlined a West Edinburgh ‘area of search’ which includes the A71 corridor. This is supported and provides a basis for support of Hatton Village linked to key public transport infrastructure improvements including a bus rapid transit corridor within the LDP timeframe. **Figure 26** indicates this area of search.

12.5 Inverdunning (Hatton Mains) Ltd welcome the opportunity of discussing the West Edinburgh proposals further with Council and key partners to integrate Hatton Village within a series of linked major growth areas.

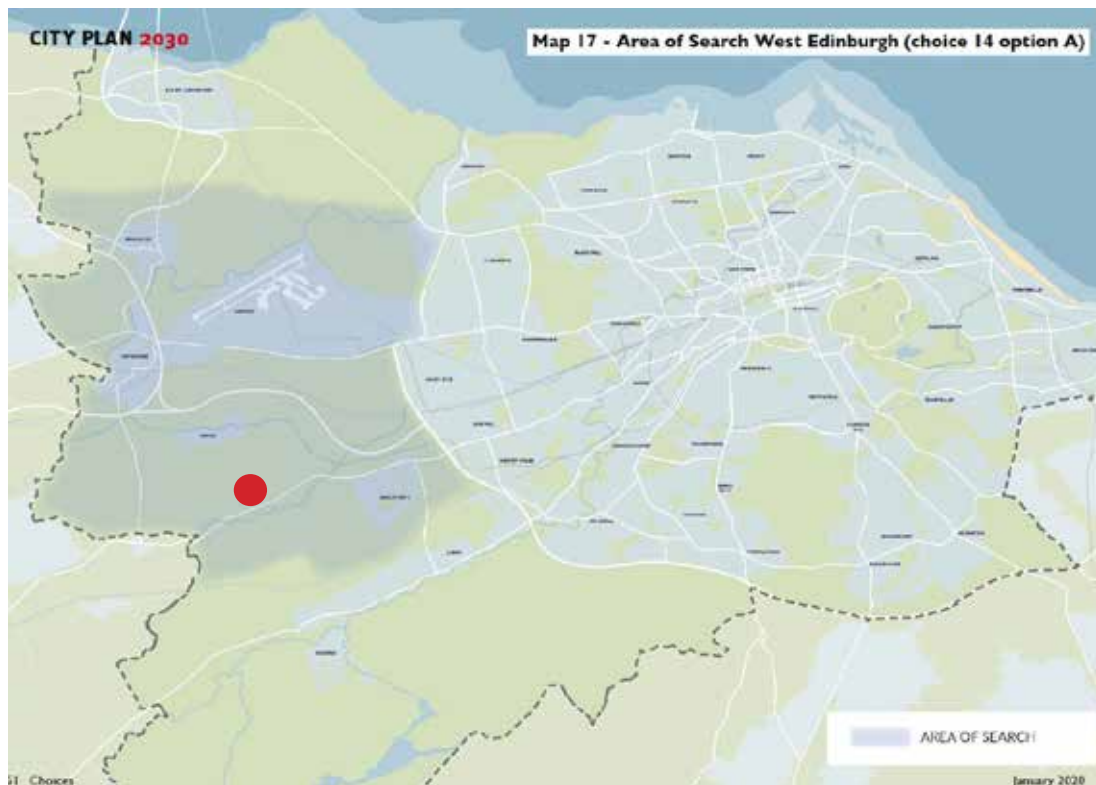


Figure 26 - West Edinburgh Area of Search (Hatton Village site denoted in red)





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