

Customer Ref: 01753 Response Ref: ANON-KU2U-GWGT-Z

Name: Mr Oliver Munden

Response Type: Agent / Consultant

On behalf of: AEW Ltd

Supporting Info:

Email: oliver.munden@avisonyoung.com

Choice 1 A

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

Short Response:

Explanation:

Choice 1 B

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

Short Response:

Explanation:

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Choice **1 C**

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

Short Response

Explanation

Choice **1 D**

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

Short Response

Explanation

Choice **1 E**

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

Short Response

Explanation

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Choice **1 F**

We want to identify specific sites for new allotments and food growing, both as part of new development sites and within open space in the urban area. Do you agree with this? - Yes / No

Short Response

Explanation

Choice **1 F**

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

Short Response

Explanation

Choice **1 G**

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

Short Response

Explanation

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Choice **1 H**

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

Short Response

Explanation

Choice **2 A**

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

Short Response

Explanation

Choice **2 B**

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

Short Response

Explanation

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Choice **2 C**

We want to revise our design and layout policies to achieve ensure their layouts deliver active travel and connectivity links. Do you agree with this? - Yes / No

Short Response

Explanation

Choice **2 D**

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

Short Response

Explanation

Choice **3 A**

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

Short Response

Explanation

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Choice **4 A**

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

Short Response

Explanation

Choice **4 B**

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

Short Response

Explanation

Choice **5 A**

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

Short Response

Explanation

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Choice **5 B**

We want City Plan 2030 to set out where new community facilities are needed, and that these must be well connected to active travel routes and in locations with high accessibility to good sustainable public transport services. Do you agree with this? - Yes / NO

Short Response

Explanation

Choice **5 C**

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

Short Response

Explanation

Choice **5 D1**

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

Short Response

Explanation

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Choice 5 D2

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

Short Response

Explanation

Choice 5 E

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

Short Response

Explanation

Choice 6 A

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

Short Response

Explanation

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Choice **6 B**

We want to use Place Briefs to set the targets for trips by walking, cycling and public transport based on current and planned transit interventions. This will determine appropriate parking levels to support high use of public transport. Do you agree with this? - Yes / No

Short Response

Explanation

Choice **7 A**

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

Short Response

Explanation

Choice **7 B**

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

Short Response

Explanation

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Choice **7 C**

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

Short Response

Explanation

Choice **7 D**

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

Short Response

Explanation

Choice **8 A**

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

Short Response

Explanation

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Choice **8 B**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

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Choice 9 A

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

Short Response

Explanation

Choice 9 B

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

Short Response

Explanation

Choice 10 A

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

Short Response

Explanation

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Choice **10 B**

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

Short Response

Explanation

Choice **10 C**

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

Short Response

Explanation

Choice **11 A**

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

Short Response

Explanation

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Choice 11 B

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

Short Response Not Answered

Explanation Not Answered

Choice 12 A

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

Short Response Not Answered

Explanation

Choice 12 B1

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

Short Response Not Answered

Explanation

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Choice **12 B2**

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

Short Response

Explanation

Choice **12 B3**

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

Short Response

Explanation

Choice **12 B4**

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

Short Response

Explanation

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Email

Choice **12 B5**

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

Short Response

Explanation

Choice **12 B6**

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

Short Response

Explanation

Choice **12 B7**

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

Short Response

Explanation

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Response Type

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Choice **12 B8**

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

Short Response

Explanation

Choice **12 B9**

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

Short Response

Explanation

Choice **12 B10**

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

Short Response

Explanation

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Response Type

On behalf of:

Choice **12 BX**

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

Short Response

Explanation

Choice **12 C**

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

Short Response

Explanation

Choice **12 C**

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

Short Response

Explanation

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Choice 12 C

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

Short Response

Explanation

Choice 12 D

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

Short Response

Explanation

Choice 13 A

We want to create a new policy that provides support for social enterprises, start-ups, culture and tourism, innovation and learning, and the low carbon sector, where there is a contribution to good growth for Edinburgh. Do you agree with this? - Yes / No

Short Response

Explanation

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Choice **14 A**

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

Short Response

Explanation

Choice **14 B**

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

Short Response

Explanation

Choice **14 C**

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

Short Response

Explanation

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On behalf of:

Choice **15 A**

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

Short Response

Explanation

Choice **15 B**

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

Short Response

Explanation

Choice **15 C**

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

Short Response

Explanation

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Choice 15 D

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

Short Response

Explanation

Choice 15 E

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

Short Response

Explanation

Choice 15 G

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

Short Response

Explanation

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Choice 16 A1

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

Short Response

Explanation

Choice 16 A2

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

Short Response

Explanation

Choice 16 A3

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

Short Response

Explanation

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Choice 16 A4

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

Short Response

Explanation

Choice 16 A5

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

Short Response

Explanation

Choice 16 A5

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

Short Response

Explanation

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Choice 16 B

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

Short Response

Explanation

Choice 16 C

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

Short Response

Explanation Our client also wishes to comment on Choice 16 within the emerging LDP which relates to existing office uses across Edinburgh. Due to ongoing pressure within the city centre on office floorspace from proposals for redevelopment for other land uses, we note that this Choice includes a potential proposal to introduce a policy to prevent the loss of all existing offices across the city. We consider that this approach would be extreme, particularly given the marketing evidence for a site such as Ferrymuir, that was set out earlier. This would prevent sites that no longer have a realistic future as an office location from being redeveloped for appropriate land uses, such as permitted within the adopted LDP. Our client does not therefore support option C but instead believes option D to be more appropriate, where this policy would only apply within Edinburgh city centre.

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Supporting Info

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Choice 16 E1

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

Short Response

Explanation

Choice 16 E2

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

Short Response

Explanation

Choice 16 E3

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

Short Response

Explanation

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Choice 16 E4

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

Short Response

Explanation

Choice 16 E5

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

Short Response

Explanation

Choice 16 E6

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

Short Response

Explanation

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Choice 16 E7

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

Short Response

Explanation

Choice 16 E8

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

Short Response

Explanation

Choice 16 EX

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

Short Response

Explanation

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On behalf of:

Choice 16 F

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

Short Response

Explanation

Choice 16 G

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

Short Response

Explanation

Choice 16 H

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

Short Response

Explanation

Customer Ref:

01753

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ANON-KU2U-GWGT-Z

Supporting Info

Name

Mr Oliver Munden

Email

oliver.munden@avisonyoung.com

Response Type

Agent / Consultant

On behalf of:

AEW Ltd

17 April 2020

avisonyoung.co.uk

Development Management
Business Centre G.2
Waverly Court
4 East Market Street
Edinburgh
EH8 8BG

Dear Sir or Madam

REPRESENTATION TO 'CHOICES FOR CITY PLAN 2030'

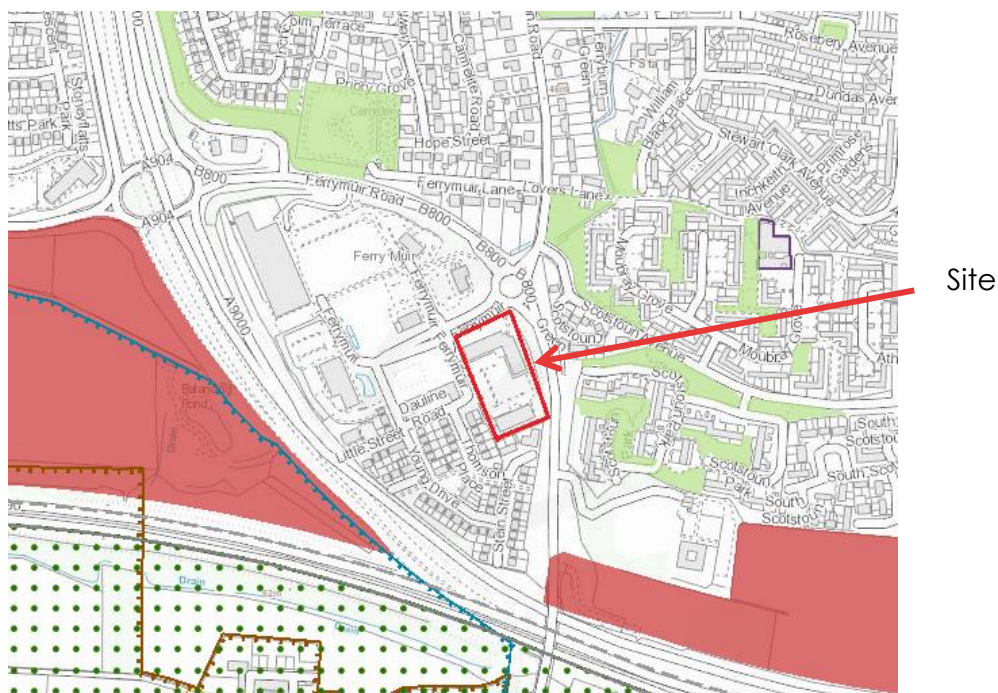
We act on behalf of our client, AEW UK Investment Management LLP ("AEW UK"), and write with regards to the above consultation process. AEW welcome the opportunity to engage with and respond to the Edinburgh Choices for City Plan 2030 process to ensure that an appropriate policy framework is in place to support their plans for investment.

AEW are the owners of a site located at Ferrymuir, South Queensferry which contains two office buildings known as Norseman House and Westcott House. A location plan is included below:



Ferrymuir extends to approximately 0.9 hectares (2.2 acres) and sits within the southern area of South Queensferry, adjacent to the B800 and A9000. The immediate uses close to the site are mixed, to the north and west lies a Tesco superstore, Dakota hotel, Burger King and a restaurant and to the east and south there are residential properties. The residential properties to the south of the site are new build which have been constructed within

the last 4 years. South Queensferry has seen a large expansion to its settlement in the last few years as large swathes of greenbelt were allocated for housing in the Edinburgh Local Development Plan (2016). Sites within close proximity to the AEW site that were allocated for housing in the adopted LDP were HSG 1, 2, 32 and 33.



As can be seen from this extract from the proposals map of the Edinburgh Local Development Plan (2016) the site sits within the urban area and settlement boundary of South Queensferry, but does not have a specific land use allocation. The proposal map shows HSG sites 32 and 33 to the west and east of the site respectively, they are both allocated for housing.

Any planning application that would be submitted currently and determined under the current Local Development Plan would have been assessed against Policy Emp9 of the LDP. This allowed for current un-allocated employment sites to be redeveloped, with the LDP recognising that there could be potential benefits in realising their development for alternative uses. Due the uncertainty surrounding continuing employment use at this site, our client wishes to retain the flexibility currently offered and we believe there are strong reasons to support this position. AEW are accordingly making representations to the Choices for City Plan 2030, to set this out and their view that the site should be allocated for residential development in the next LDP.

Choice 12 – Building our new homes and infrastructure

These representations are made in order to seek an allocation for Ferry Muir as a residential development site, as this is considered to be a more suitable use for the land and would also be beneficial to the city in contributing to the City of Edinburgh Council's housing land supply. This is particularly relevant given the Council's preferred option (A) within Choice 12 of delivering housing on brownfield sites within the urban area, and ties into the aim of the plan of "A City which everyone lives in a home they can afford".

Choice 12 in the Choices for City Plan 2030 MIR 'Building our new homes and Infrastructure' states that new homes need to be provided for Edinburgh and that land needs to be allocated in order to accommodate these new homes. Choice 12 identifies three steps that need to be achieved in order to deliver housing, these are:

- A. Decide how many homes to provide
- B. Who will deliver these homes, and

C. Where we will deliver the homes in the most sustainable way

Based on these three criteria, the Council have identified a preferred option for the delivery of 17,600 homes within the urban area by the Council and its partners. Two alternative options are also included, with a variety of housing numbers included. However the lowest of these is 17,600 units up to 2032. These reps will not respond to the housing target suggested within Choices, however it is considered that a mix of housing sites will be required to meet whichever option is taken forward. In this regard, it is considered that the site at Ferrymuir could help deliver housing to meet this target.

We have therefore considered the delivery of the site to enable its inclusion within calculations for delivering the required housing within the city

Based on a recommended density under choice 2 of 65 dwellings per hectare, we have estimated that the site could deliver 59 housing units, subject to other site considerations such as open space etc.

It is envisaged that any future residential development on site would likely be carried out by a private developer, however as it has capacity for around 59 dwellings under the proposed changes in choice 2, then the site would be required to abide to the 25% affordable housing policy. This would rise to 35% if choice 11 is approved to be taken forward for the next LDP. The site could therefore deliver around 21 affordable homes with a 35% provision.

By allocating the site for housing then this would help contribute to either option 1 or 3 by providing land for housing on brownfield sites and less the need to release greenfield land for development or having to acquire land through CPO.

Below we have considered a number of site characteristics to support the representation seeking an allocation of the Ferrymuir site for housing.

Surrounding uses

In recent years as the settlement of South Queensferry has grown, the Ferrymuir site has become encompassed by an increasing number of residential neighbourhoods. Indeed, during the course of the preparation for the adopted Local Development Plan, the site was reallocated from Business and Employment land, to white land, where the general policies of the LDP apply and policy Emp9. In addition to the sites allocated for housing in the 2016 LDP, two adjacent sites to Ferrymuir have also had planning permission granted for residential developments.

In May 2018, permission was granted for the development of 44 residential units at the site at '80 metres to the west of 4 Ferrymuir' (17/00301/FUL), this site had previously lain empty and in the report of handling it was stated that the site was within an established residential neighbourhood.

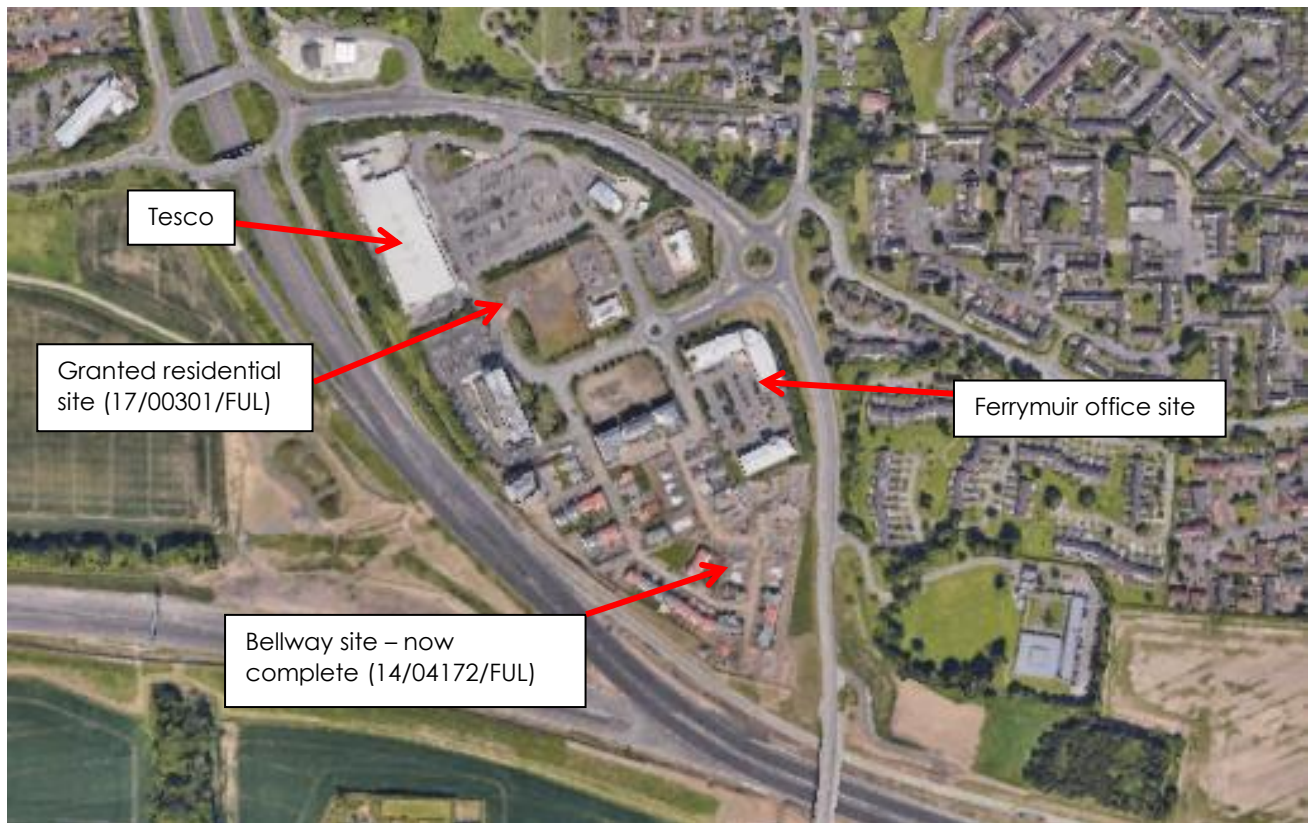
In December 2015 the site to the immediate south of the Ferrymuir offices site was granted permission for the development of 143 houses and flats (14/04172/FUL).

In the Development Management Sub-committee report for 14/04172/FUL, it was noted in the assessment of the proposals that:

"The site is not recognised as an area with peak demand for prime business space compared to the existing provision at Edinburgh Park nor located within what could be considered a prime office location"

The Council's own economic development team agreed with these findings in their formal consultation response to the application.

A plan identifying these approved applications in the context of the Ferrymuir site is provided below:



Suitability for offices

The site itself no longer suits an office use. This is due to limited office demand in this location. This was recognised in the previous LDP hence its reallocation. Assessed against the current adopted policy, Emp9, and the criteria set out, it is clear that the proposals would have satisfied this policy as the site is less than 1ha and could be developed without impacting on other employment uses nearby. The new use would also better complement recent housing development immediately adjacent the site thereby satisfying the relevant criteria.

The current offices in site are part of the original Ferrymuir mixed use site, which included for the development of the supermarket, food and beverage units and hotel. However the demand for the offices has been limited. Norseman House lay empty for 2 years after construction prior to a tenant moving in, and Westcott House struggled to let and carried a 3,000 sq ft void for about 6 years before the current tenant moved in.

The opening of the Queensferry Crossing in 2017 saw the rerouting of much of the motorway traffic away from the A9000. This, together with the relatively high rise residential development between the office buildings and the motorway, means that the site has now lost its key unique selling proposition – namely being right on an intersection of a principal motorway connecting Edinburgh and the north of Scotland. This connectivity was the key draw for all the tenants at the park.

All four of the tenants have break options or lease expires in the next three years. Given the above, it would not be unreasonable to assume that all four could vacate the site. The biggest concern of which would be if the tenant of Norseman House exit the site. This would create a significant void and with the change in occupier trends, it would be extremely unlikely that another single occupier could be secured at Ferrymuir. This would mean sub-dividing the building and embarking on a multi-let strategy. The fact the last vacant suite (3,000 sq ft) took over six years to let indicates that the building would remain vacant or significantly vacant for a number of years.

The City Plan 2030 Commercial Needs Study provides a valuable insight into Edinburgh's office market. The report found that vacancy rates 'elsewhere' in Edinburgh, which includes all other

offices locations which are not City Centre, West Edinburgh (IBG, Airport, South Gyle, Gogarburn e.g.), Waterfront and South East are slightly higher (at 12%), than the city average of 11%. This shows that the supply is higher than demand in areas of the city outwith key office locations and that occupiers would prefer to locate elsewhere. The City Centre has a vacancy rate of 10% and the Waterfront a rate of 8%, which shows there is higher occupational demand for these locations.

The site is not well connected to other office agglomerations and the site is situated in a residential setting, with poor external visibility. As identified in the study, from 2017 the majority of office development occurred in established office locations. 75,550 sq.m of office construction was located within 4 sites in the city centre. Of the 538,000 sq.m of office proposals that secured planning permission in the city since 2017:

- 37% was at Edinburgh Park
- 21% at Edmonstone Campus
- 10% in city centre

'Elsewhere' locations only represent a 9% take-up of stock in Edinburgh, compared to the 71% take-up for the City Centre and 16% for West Edinburgh, this shows that occupiers will seek a central location close to other offices. This further explains the challenge facing the Ferrymuir location for securing office occupation.

Avison Young Assessment of site

Within the Council's Housing Study prepared to support the preparation of the emerging LDP, the Study assesses each site against a list of criteria. Avison Young have therefore adopted the same approach, and evidence base to support these criteria. Our assessment is provided below:

Site Address	Ferrymuir Offices
10 min walk to local convenience services	Green
30 min walk to employment clusters	Red
Access to wider cycle network	Green
Active Travel (overall)	Yellow
Public Transport	Yellow
Primary Capacity	Yellow
Secondary Capacity	Yellow
Community Infrastructure Overall	Yellow
Flood Risk	Green
SUMMARY	Yellow

Taking each of these criteria in turn:

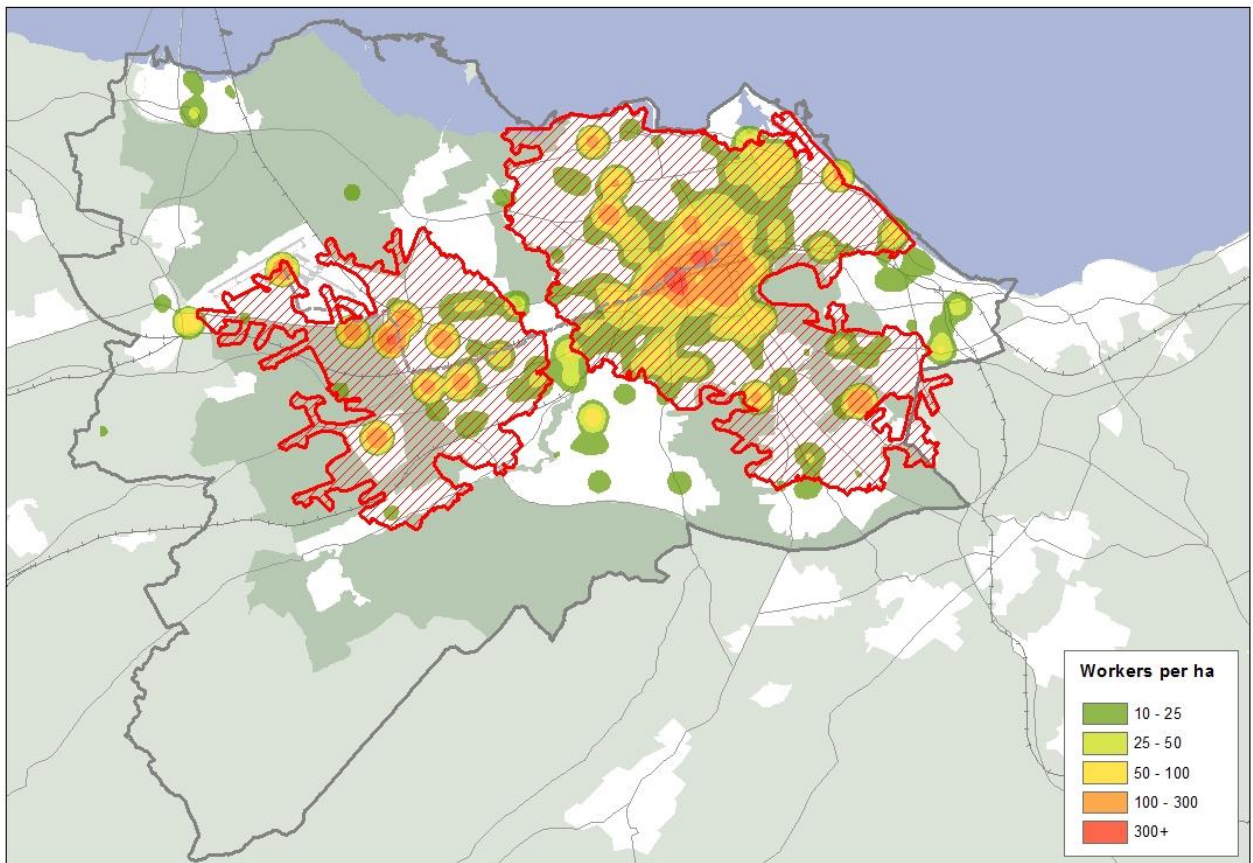
Active Travel

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

The site is well located for access to grocery shopping, it is a 4-minute walk to the adjacent Tesco Superstore which provides other convenience services such as a mobile phone shop, a pay+ point and an ATM machine. Additionally there is a Scotmid and a Day To Day on Scotstoun Avenue. These shops fall within a 10 minute (800m) distance to the site (which is determined by CEC as an appropriate time to reach a local shop). The site therefore supports travel by foot to convenience services to support non-car travel and reduce the need to travel longer distances.

Does the site support travel by foot to identified employment clusters? No

A 30 minute walk time (2,400m distance) is determined by CEC to be an appropriate maximum time to reach employment. For CEC's housing assessment it was determined that an employment cluster would be defined as an area that has an employment density of 100 workers per ha or more. Below is the map used for the assessment that shows employment density in Edinburgh, the red hatched area on the map is the area within the 30 minute walking distance. This site does not fall within this area.



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

The site is 600 metres from the National Cycle Network 1 (NCN) and is also close to NCN 76 'Round the Forth'. Easy connections are also possible to other cycle routes from the NCN 1 including Quiet Route 11, 12 and 20.

Does the site support active travel overall? *Partially*

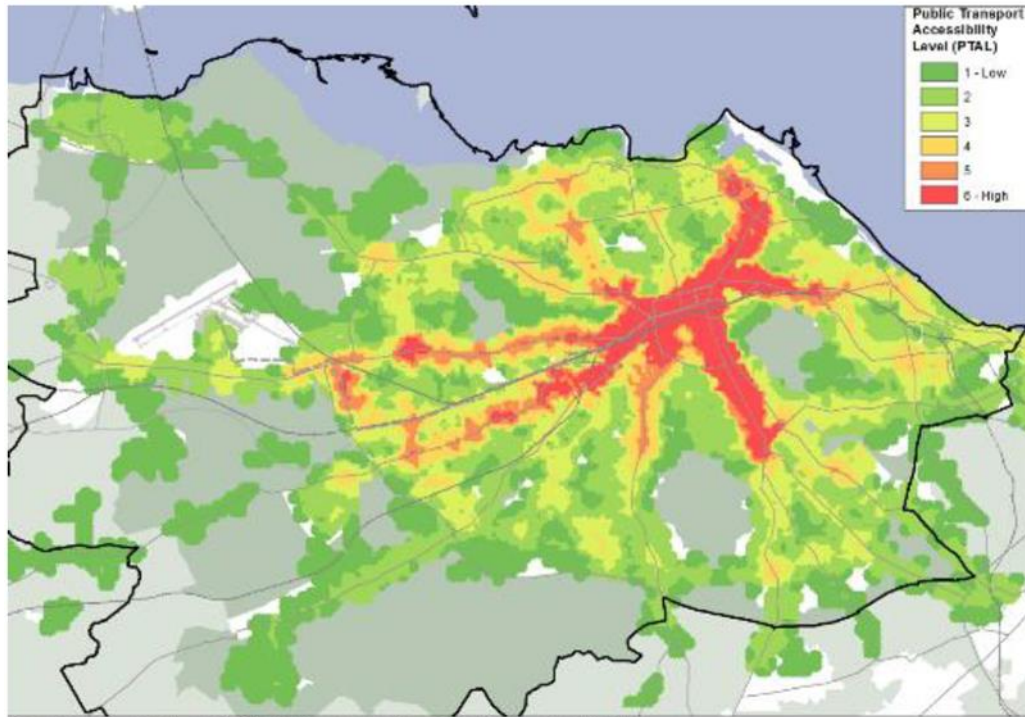
Taking into account the above access by foot and cycle, the Ferrymuir site partially supports active travel. The site offers convenience choice on its doorstep, the nearest centre (South Queensferry Town Centre) is a 15 minute walking distance and the nearest train station is a 20 minute walking distance from the site. However there are no employment clusters within a 30 minute walking distance.

Public Transport

Does the site support travel by public transport? *Partially*

The below map is included in Steer Jacobs 2019 "Edinburgh's Strategic Sustainable Transport Study – Phase 2" Report and outlines transport accessibility across the city. The site lies within Ferrymuir which based on this map, has a transport accessibility level of 2, which is not considered by the Council to be a sufficient level of accessibility.

Figure 4-5: Accessibility to the Transport Network



The site does however lie in close proximity to bus stops and services on Kirkliston Road and Scotstoun Avenue where there is frequent access to the following services:

Bus Stop	Services
Lovers Lane (Kirkliston Road)	7, 23A (Southbound only) 63
Moubray Grove (Scotstoun Avenue)	7, 23A (Eastbound only), 43, 63, N43, X43

There is also a train station at Dalmeny which is a 20 minute walk from the site.

Community Infrastructure

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

The Background Monitoring Statement which supports Choices for City Plan 2030 shows the projected capacities at Edinburgh's schools in 2032. The school roll projections are based upon expected population increases due to new house building. The statement shows that there will be no capacity in schools in the North West region of Edinburgh.

Queensferry Primary is predicted to reach capacity in 2022 with the Council's Housing Study identifying that a new primary school will be required to deal with education capacity issues in this part of Edinburgh. The Edinburgh LDP non-statutory supplementary guidance – 'Developer Contributions & Infrastructure Delivery 2018' identifies that future residential development in the area will be required to contribute towards a number of planned education infrastructure improvements.

On the basis of the above, it is considered that primary school capacity issues could be mitigated through appropriate intervention, including contributions from residential developments.

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

The site falls within the Queensferry Community High School Catchment. The Monitoring Statement projects that in 2032, there will be no capacity at the school. Indeed, it is estimated that the school will reach capacity in 2021.

The Housing Study identifies that a new secondary school with a capacity of 1200 could be built in the area that would accommodate pupils from South Queensferry and Kirkliston. It is also identified in the non-statutory supplementary guidance – 'Developer Contributions & Infrastructure Delivery 2018' that any future residential development on the site would fall into the contribution zone for creating additional capacity at Queensferry High.

On the basis of the above, it is considered that secondary school capacity issues could be mitigated through appropriate intervention, including contributions from residential development to enable the release of the Ferrymuir site for re-development.

Flood Risk

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

The site is not identified by SEPA flood risk maps as being at risk of fluvial flooding.

Overall Assessment

The findings of the assessment clearly demonstrate that the Ferrymuir site is located in an area previously deemed acceptable for new housing development, with it satisfying a number of the Council's own criteria for site suitability for this form of land use. Where the site does not fully satisfy certain aspects, it is apparent that this could be addressed via standard mitigation measures, as is the case with most residential development sites. These should therefore not be seen as a barrier to the site's suitability for residential land use in future.

Choice 16 – Delivering Office, Business and Industry Floorspace

Finally, our client also wishes to comment on Choice 16 within the emerging LDP which relates to existing office uses across Edinburgh. Due to ongoing pressure within the city centre on office

floorspace from proposals for redevelopment for other land uses, we note that this Choice includes a potential proposal to introduce a policy to prevent the loss of all existing offices across the city.

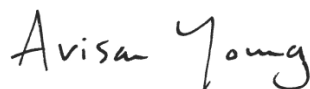
We consider that this approach would be extreme, particularly given the marketing evidence for a site such as Ferrymuir, that was set out earlier. This would prevent sites that no longer have a realistic future as an office location from being redeveloped for appropriate land uses, such as permitted within the adopted LDP. Our client does not therefore support option C but instead believes option D to be more appropriate, where this policy would only apply within Edinburgh city centre.

Summary

AEW welcomes this opportunity to comment on the Edinburgh Choices for City Plan 2030 consultation and we trust that this representation will be considered during the next stages of plan preparation.

Through this representation we have identified strong reasons to support the allocation of Ferrymuir site for residential development, which will assist in the delivery of the housing targets set for Edinburgh. We would welcome the opportunity to discuss the above matters further if this would be of any assistance and we reserve the opportunity to comment on latter stages of the plan, as appropriate. In the meantime, we look forward to receiving formal acknowledgement of the receipt of this representation in due course.

Yours faithfully

A handwritten signature in black ink that reads "Avison Young". The signature is written in a cursive, flowing style.

Avison Young (UK) Limited
For and on behalf of AEW UK