

Customer Ref: **Response Ref:**

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Supporting Info

Email

Choice **1 C**

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

Short Response

Explanation

Choice **1 D**

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

Short Response

Explanation

Choice **1 E**

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 1 F

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

Short Response

Explanation

Choice 1 F

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

Short Response

Explanation

Choice 1 G

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

Short Response

Explanation

Customer Ref: 01687 Response Ref: ANON-KU2U-GPUC-P
Name: Montagu Evans LLP
Response Type: Agent / Consultant
On behalf of: Arnold Clark Automobiles Limited

Supporting Info: Yes

Email: ally.campbell@montagu-evans.co.uk

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: Not Answered

Explanation: Not Answered

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: Not Answered

Explanation:

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

Supporting Info

Email

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 Choice 2 states that the Council may revise their approach to residential development density in the City Plan 2030 to ensure that the limited developable land in Edinburgh is used as efficiently as possible, with the under-development of sites avoided. Arnold Clark welcome the introduction of increased support for higher density development and would support the Council's use of "minimum" dwellings per hectare. It is agreed that increasing the density of all development in the city, relative to a proposals surroundings, is a positive step to ensuring that the development potential of Edinburgh's urban area is maximised. The redevelopment of land at Seafield Road for residential development will contribute significantly to housing land supply for the city and can deliver high-density, mixed use development in proximity to public transport networks and active travel routes.

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

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

Supporting Info

Email

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

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

Customer Ref: 01687 Response Ref: ANON-KU2U-GPUC-P

Supporting Info Yes

Name Montagu Evans LLP

Email ally.campbell@montagu-evans.co.uk

Response Type Agent / Consultant

On behalf of: Arnold Clark Automobiles Limited

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 Not answered

Explanation Not Answered

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 Not Answered

Explanation Not Answered

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 Not Answered

Explanation Not Answered

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

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

Supporting Info

Email

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 The proposed residential allocation at Seafield Road will be reliant on existing sustainable infrastructure, including bus, as well as cycle and pedestrian infrastructure. Our client agrees with the Council's continued prioritisation of pedestrians and cyclists over cars and the promotion of more active and sustainable travel choices to reduce the overall reliance on car usage. The site at Seafield Road has the ability to deliver high-density, mixed use development in proximity to public transport networks and active travel routes.

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

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

Supporting Info

Email

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

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

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

Supporting Info

Email

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 The proposed residential allocation at Seafield Road will be reliant on existing sustainable infrastructure, including bus, as well as cycle and pedestrian infrastructure. Our client agrees with the Council's continued prioritisation of pedestrians and cyclists over cars and the promotion of more active and sustainable travel choices to reduce the overall reliance on car usage. The site at Seafield Road has the ability to deliver high-density, mixed use development in proximity to public transport networks and active travel routes.

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

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

Supporting Info

Email

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

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

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

Customer Ref: 01687 Response Ref: ANON-KU2U-GPUC-P
Name: Montagu Evans LLP
Response Type: Agent / Consultant
On behalf of: Arnold Clark Automobiles Limited

Supporting Info: Yes

Email: ally.campbell@montagu-evans.co.uk

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: Not Answered

Explanation: Not Answered

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: No

Explanation: Within the Choices Paper, CEC are considering amending their policy to increase the provision of affordable housing requirement from 25% to 35%. All development, including conversions, which consist of 12 residential units or more must include provision for affordable housing amounting to 35% of the total units. This policy will also apply to all land coming forward for other uses (as set out in Choice 10) i.e. where a site is required to deliver at least 50% housing, at least 35% of this housing must also be affordable. CEC wish City Plan 2030 to require a mix of housing types and tenures. There is concern over the increasing of this affordable housing requirement in viability terms. It is submitted that affordable housing at this level should be assessed as part of a case-by-case basis, in order to understand the viability of the overall development. If it is to be implemented we would encourage greater flexibility around tenure and models / definitions of affordable housing product.

Customer Ref: 01687 Response Ref: ANON-KU2U-GPUC-P
Name: Montagu Evans LLP
Response Type: Agent / Consultant
On behalf of: Arnold Clark Automobiles Limited

Supporting Info: Yes
Email: ally.campbell@montagu-evans.co.uk

Choice 11 B

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

Short Response: Not Answered

Explanation

Choice 12 A

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

Short Response: Option 1 (Council/

Explanation
Choice 12 provides three options on how and where City Plan 2030 will deliver new homes; 1) delivery by the council and its partners within the Urban Area (17,600 units within the urban area, 2) delivery through market housing by releasing Greenfield land, (27,900 units on greenfield land) or 3) a blended approach, (a mix of the urban area land 11,000 units, and greenfield land 6,600 units). CECs preference is for new homes to be delivered by the Council and its partners within the Urban Area. Our clients would agree with this approach. The Urban Area contains many brownfield sites which are primed for redevelopment, particularly for residential development. The land at Seafield Road is specifically allocated for both options 1 and 3 with regards to redevelopment of the urban area. It is a brownfield site, with good connectivity to local neighbourhood centres and the City Centre. Developments within the wider area could include residential led-development with active frontages, to maintain a mixed use which is also understood to be the Council's aspiration. It is submitted that Option 2 and the delivery of market housing through only greenfield land should not be considered against the development of brownfield land with existing infrastructure and connectivity in place. Our client agrees with the Council's preferred option of residential led mixed use development within the urban area.

Customer Ref: 01687 Response Ref: ANON-KU2U-GPUC-P

Supporting Info Yes

Name Montagu Evans LLP

Email ally.campbell@montagu-evans.co.uk

Response Type Agent / Consultant

On behalf of: Arnold Clark Automobiles Limited

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

Choice 12 B2

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

Short Response Not Answered

Explanation

Choice 12 B3

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

Short Response Not Answered

Explanation

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

Supporting Info

Email

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

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

Customer Ref: 01687 Response Ref: ANON-KU2U-GPUC-P
Name: Montagu Evans LLP
Response Type: Agent / Consultant
On behalf of: Arnold Clark Automobiles Limited

Supporting Info: Yes

Email: ally.campbell@montagu-evans.co.uk

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: Not Answered

Explanation

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: Not Answered

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: Not Answered

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **12 C**

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

Short Response

Explanation

Choice **12 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

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **13 A**

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

Short Response

Explanation

Choice **14 A**

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

Short Response

Explanation

Choice **14 B**

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

Short Response

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **14 C**

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

Short Response

Explanation

Choice **15 A**

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

Short Response

Explanation

Choice **15 B**

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

Short Response

Explanation

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

Supporting Info

Email

Choice **15 C**

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

Short Response

Explanation

Choice **15 D**

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

Short Response

Explanation

Choice **15 E**

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

Short Response

Explanation

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

Supporting Info

Email

Choice 15 G

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

Short Response

Explanation

Choice 16 A1

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

Short Response

Explanation

Choice 16 A2

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

Short Response

Explanation

Customer Ref: 01687 Response Ref: ANON-KU2U-GPUC-P
Name: Montagu Evans LLP
Response Type: Agent / Consultant
On behalf of: Arnold Clark Automobiles Limited

Supporting Info: Yes

Email: ally.campbell@montagu-evans.co.uk

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: Not Answered

Explanation: Not Answered

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: Not Answered

Explanation: Not Answered

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: Not Answered

Explanation: Not Answered

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

Supporting Info

Email

Choice 16 A5

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

Short Response

Explanation

Choice 16 B

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

Short Response

Explanation

Choice 16 C

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 E1

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

Short Response

Explanation

Choice 16 E2

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

Short Response

Explanation

Choice 16 E3

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

Short Response

Explanation

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

Supporting Info

Email

Choice 16 E4

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

Short Response

Explanation

Choice 16 E5

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

Short Response

Explanation

Choice 16 E6

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **16 E7**

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

Short Response

Explanation

Choice **16 E8**

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

Short Response

Explanation

Choice **16 EX**

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

Short Response

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

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: 01687 **Response Ref:** ANON-KU2U-GPUC-P

Name Montagu Evans LLP

Response Type Agent / Consultant

On behalf of: Arnold Clark Automobiles Limited

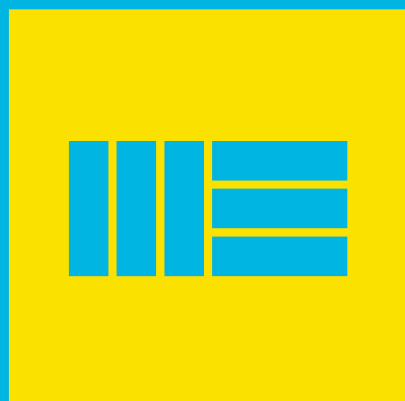
Supporting Info Yes

Email ally.campbell@montagu-evans.co.uk

CHOICES FOR CITY PLAN 2030

REPRESENTATION ON BEHALF OF
ARNOLD CLARK AUTOMOBILES LTD

APRIL 2020



CONTENTS PAGE

01 Introduction	3
02 Representation	4
03 Summary	6

01 INTRODUCTION

1.1 Montagu Evans LLP act on behalf of Arnold Clark Automobiles Ltd, who have interest in land at Seafield Road, Edinburgh.

LOCAL DEVELOPMENT PLAN REVIEW

1.2 The City of Edinburgh Council (CEC) have started the process of reviewing the current Edinburgh Local Development Plan (LDP), which was adopted by the Council in November 2016.

1.3 The first stage of the review is the production of a Main Issues Report (MIR). 'Choices for City Plan 2030' was published by the Council on 31 January 2020. The MIR sets out the Council's broad aspiration's that by 2030 Edinburgh will be:-

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

1.4 These aspirations are supported by 16 proposed policy changes.

1.5 The MIR is currently subject to a public consultation period that will run until 30 April 2020.

1.6 As a key stakeholder within Edinburgh, Arnold Clark welcomes the opportunity to respond to the MIR.

02 REPRESENTATION

- 2.1 As a key stakeholder in Edinburgh, Arnold Clark Automobiles Ltd welcome the opportunity to respond to the Choices for City Plan 2030.
- 2.2 Seafield Road is located to the north east of the City and is currently utilised by a number of business and industrial units, including car showrooms, trade counter retail parks and other similar uses.
- 2.3 Within the wider area this review of the LDP and current circumstances and timings of landowners presents a situation that is wholly conducive to examining options for wider scale regeneration and change of this site and to the benefit of all parties.
- 2.4 Early discussions have taken place with other land owners and are progressing with a view to fully understanding the full potential of the site, and how a coordinated approach to redevelopment and reconfiguration of some, if not all of the site could provide a positive change to existing operations, future potential and the wider benefits of the site as a whole in the context of the surrounding area.
- 2.5 At this stage it is premature to provide definitive information on the current status of these discussions, however it is appropriate to highlight the appetite for ongoing dialogue and to fully understand how the area could change in the context of specific proposals and future potential within this area.
- 2.6 Arnold Clark consider that the following choices are most relevant to them, and if implemented could have the greatest impact to delivering redevelopment of the proposed site. There are many synergies between what is being proposed by the new LDP and our client's own aspirations.

CHOICE 2 – IMPROVING THE QUALITY, DENSITY AND ACCESSIBILITY OF DEVELOPMENT

- 2.7 Choice 2 states that the Council may revise their approach to residential development density in the City Plan 2030 to ensure that the limited developable land in Edinburgh is used as efficiently as possible, with the under-development of sites avoided.
- 2.8 Arnold Clark welcome the introduction of increased support for higher density development and would support the Council's use of "*minimum*" dwellings per hectare. It is agreed that increasing the density of all development in the city, relative to a proposals surroundings, is a positive step to ensuring that the development potential of Edinburgh's urban area is maximised.
- 2.9 The redevelopment of land at Seafield Road for residential development will contribute significantly to housing land supply for the city and can deliver high-density, mixed use development in proximity to public transport networks and active travel routes.
- 2.10 Choice 2 may also introduce a requirement for all development to deliver quality open space and public realm that is useable for a "*range of activities, including drying space, whilst allowing for higher densities*".
- 2.11 It is submitted that the Council should apply a case-by-case qualitative approach to assessing open space and public realm provision as part of a higher density development, taking into account factors such as the surrounding area of a particular site, existing amenity spaces in proximity to a development site and the expected end users of a development.

CHOICE 6 – CREATING PLACES THAT FOCUS ON PEOPLE, NOT CARS

CHOICE 7 – SUPPORTING THE REDUCTION IN CAR USE IN EDINBURGH

CHOICE 8 – DELIVERING NEW WALKING AND CYCLING ROUTES

- 2.12 The proposed residential allocation at Seafield Road will be reliant on existing sustainable infrastructure, including bus, as well as cycle and pedestrian infrastructure.
- 2.13 Our client agrees with the Council's continued prioritisation of pedestrians and cyclists over cars and the promotion of more active and sustainable travel choices to reduce the overall reliance on car usage.
- 2.14 The site at Seafield Road has the ability to deliver high-density, mixed use development in proximity to public transport networks and active travel routes.

CHOICE 11 – DELIVERING MORE AFFORDABLE HOMES

- 2.15 Within the Choices Paper, CEC are considering amending their policy to increase the provision of affordable housing requirement from 25% to 35%. All development, including conversions, which consist of 12 residential units or more must include provision for affordable housing amounting to 35% of the total units. This policy will also apply to all land coming forward for other uses (as set out in Choice 10) i.e. where a site is required to deliver at least 50% housing, at least 35% of this housing must also be affordable. CEC wish City Plan 2030 to require a mix of housing types and tenures.
- 2.16 There is concern over the increasing of this affordable housing requirement in viability terms. It is submitted that affordable housing at this level should be assessed as part of a case-by-case basis, in order to understand the viability of the overall development. If it is to be implemented we would encourage greater flexibility around tenure and models / definitions of affordable housing product.

CHOICE 12 – BUILDING OUR NEW HOMES AND INFRASTRUCTURE

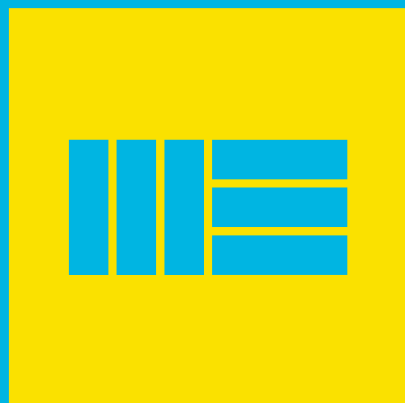
- 2.17 Choice 12 provides three options on how and where City Plan 2030 will deliver new homes;
- a. delivery by the council and its partners within the Urban Area (17,600 units within the urban area,
 - b. delivery through market housing by releasing Greenfield land, (27,900 units on greenfield land) or
 - c. a blended approach, (a mix of the urban area land 11,000 units, and greenfield land 6,600 units).
- 2.18 CECs preference is for new homes to be delivered by the Council and its partners within the Urban Area.
- 2.19 Our clients would agree with this approach. The Urban Area contains many brownfield sites which are primed for redevelopment, particularly for residential development.
- 2.20 The land at Seafield Road is specifically allocated for both options 1 and 3 with regards to redevelopment of the urban area. It is a brownfield site, with good connectivity to local neighbourhood centres and the City Centre. Developments within the wider area could include residential led-development with active frontages, to maintain a mixed use which is also understood to be the Council's aspiration.
- 2.21 It is submitted that Option 2 and the delivery of market housing through only greenfield land should not be considered against the development of brownfield land with existing infrastructure and connectivity in place. Our client agrees with the Council's preferred option of residential led mixed use development within the urban area.

03 SUMMARY

- 3.1 Arnold Clark support a range of principles suggested as part of the Choices for CityPlan 2030 paper, however we have made comments above as to technical details to where these have the potential to affect redevelopment aspirations of the subject site and the vision for the wider surrounding area.
- 3.2 Our client supports the allocation of residential led mixed use development at Seafield Road and agrees with the Council's preferred strategy of utilising brownfield land within the urban area, over the release of greenfield land.
- 3.3 We trust that the above and attached will be given due regard in the process of preparing the new City Plan 2030. We would be grateful to be kept advised of future opportunities to engage in the process and would be pleased to meet with the Council to further discuss matters as required.

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WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALY SENSITIVE INFORMATION.
WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL.