

Customer Ref: 00006 Response Ref: ANON-KU2U-GP7H-W
Name Adam Richardson
Response Type Agent / Consultant
On behalf of: CBRE Global Investors

Supporting Info Yes
Email arichardson@savills.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 Not Answered

Explanation Not Answered

Choice 1 B

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

Short Response Not Answered

Explanation Not Answered

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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 Not Answered

Explanation Not Answered

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 Not Answered

Explanation Not Answered

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 Not Answered

Explanation Not Answered

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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

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On behalf of:

Supporting Info
Email

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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Supporting Info

Email

Choice **2 C**

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

Short Response

Explanation

Choice **2 D**

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

Short Response

Explanation

Choice **3 A**

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

Short Response

Explanation

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Response Type

On behalf of:

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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On behalf of:

Supporting Info

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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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Response Type

On behalf of:

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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Supporting Info

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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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Response Type

On behalf of:

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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Email

Choice 10 B

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

Short Response

Explanation

Choice 10 C

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

Short Response

Explanation
New policy provisions supporting increased use flexibility in commercial centres to accommodate mixed uses including housing are fully supported. Clearly, housing complements existing retail floorspace and helps to best utilise available land and create sustainable mixed use communities within the urban area. In such circumstances, increased land efficiencies and densities around existing amenities and infrastructure is sustainable and wholly desirable in planning and commercial terms.

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 Not Answered

Choice 12 B1

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

Short Response Not Answered

Explanation

Customer Ref: Response Ref:

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Response Type

On behalf of:

Supporting Info

Email

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

Customer Ref: Response Ref:

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Name

Email

Response Type

On behalf of:

Choice **12 B5**

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

Short Response

Explanation

Choice **12 B6**

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

Short Response

Explanation

Choice **12 B7**

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

Short Response

Explanation

Customer Ref: Response Ref:

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Response Type

On behalf of:

Supporting Info

Email

Choice **12 B8**

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

Short Response

Explanation

Choice **12 B9**

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

Short Response

Explanation

Choice **12 B10**

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

Short Response

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

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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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 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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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 Yes, the continuation of the broad 'town centre first approach' in accordance with national policy is accepted. Notwithstanding, this must be sufficiently nuanced and flexible to ensure that investment opportunities are not lost to the locale, and wider City, which would benefit and create greater public access to amenities. Clearly there are numerous occasions where development either cannot be accommodated within the City Centre (for instance on account of space requirements) or would not be appropriately accommodated within the City Centre (for instance in meeting a local requirement/need). The policy instruments of the sequential approach and use-appropriate impact assessments continue to have relevance and purpose in this regard.

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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 We do not agree with the approach outlined at Choice 15B. It is questionable as to the weight that can be afforded to the ECNS for development management purposes as it was plainly not prepared as a Development Management tool, but to provide background information for the preparation of this City Plan. It does not, and could not, anticipate the site specific detail that is required to appropriately assess individual retail and leisure development proposals. The Edinburgh Commercial Needs Study (ECNS) undertook a high level, broad brush analysis of retail deficiencies for the City of Edinburgh. This report inter alia concluded that, for the City as a whole: "The convenience retail capacity study suggests that Edinburgh is currently well endowed with supermarkets and discount foodstores generally. The scope for servicing additional new convenience floorspace over and above the current consents will mostly be in the form of trade diversion from existing stores, rather than reliance on spare capacity. This situation still presents opportunities to improve the quality, range and choice of existing convenience stores generally." The ECNS identifies five separate catchment 'zones' across the whole of Edinburgh. The boundaries drawn are arbitrary 'zones' and have no relationship to retail and leisure expenditure patterns nor any specific retail development catchment or defined Centre. The correct policy test to address retail impact and deficiencies is clearly concerned with the catchment area of a proposal. There is no suggestion in the ECNS that the identified 'zones' are appropriate catchment areas for any particular retail or leisure proposal (due to their scale). In considering a proposal for new retail or leisure development, the 'zones' identified in the ECNS should not be viewed as appropriate given the distinct need to assess the (local) catchment area of the proposal which could be significantly smaller than the identified 'zones' in the ECNS. Assessment of Deficiencies In exploring the above further, the boundaries used for the ECNS zones do not relate to retail and leisure expenditure patterns nor any specific retail development catchment or defined Centre and the existence of very high levels of expenditure flows between different 'zones'. The quantitative analysis that was undertaken in the ECNS that led to the quoted conclusion above (para 2.52) did not consider quantitative or qualitative deficiencies within local catchments, instead being based on five broad 'zones' within the City (see Section 7 and Table 7.1). For instance, Zone 2 takes in an extensive area containing several catchments and vastly different and distinct areas of West Edinburgh (Ravelston, Blackhall, Craighleith etc.), Inverleith, Canonmills, Granton, Pilton and Leith, stretching as far west as Restalrig and Seafield in the East. It is not reasonable or credible to apply these conclusions in a blanket fashion to planning application proposals, and assume that all residents in these broad 'zones' have equal access. Moreover, the quantitative 'over provision' across this whole area argued by the ECNS can largely be explained by the slower than expected progress of new housing across the Waterfront, whereby, for example, an extensive Morrisons superstore (which at UK National Averages would have a turnover of c. £40m) was effectively delivered ahead of the anticipated housing. Clearly, this historic delivery issue is however changing, with several new housing developments now on site (from the 132 unit Link 'Plot 27' site to the 388 unit CALA development at Ocean Terminal/Waterfront Plaza) or recently consented/programmed in (e.g. 938 unit Forthside development at Western Harbour), with 'infrastructure first' proposals now advancing to facilitate the delivery of c. 3,500 new homes in Granton (from

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2022/23 to 2037).An assessment of City-wide retail capacity does not assist in assessing whether or not there are significant quantitative retail deficiencies within any local area within the City. Therefore, the ECNS only provides limited information that can be used for assessing whether or not a development does, or does not, address quantitative retail deficiencies (as indicated in the policy tests). Policy tests currently focus on whether or not there are deficiencies within the catchment area of the development proposal and not arbitrarily defined parts of the City. They should continue to do so.As such – and in line with the provision of the current LDP – a finer grain analysis reflecting the reality of local catchments is required to allow development management decision to be sufficiently informed when assessing proposals for new retail and leisure developments. For the reasons outlined above this representation does not agree with the approach set out above in Issue 15B. It is strongly advised that this is revised as matters progress top the Proposed City Plan 2030. See Supporting Doc

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

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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 New policy provisions supporting increased use flexibility in commercial centres to accommodate mixed uses including hotels are fully supported. Clearly, within the city area, hotels complement existing retail offer and help to best utilise available land to create sustainable mixed use communities. In such circumstances, increased land efficiencies and densities around existing amenities and infrastructure is sustainable and wholly desirable in planning and commercial terms.

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 We agree that there should be flexibility for Commercial Centres to meet with market requirements, in respect of both retail and leisure. With regard to Choice 15G, it is considered that the seven existing Commercial Centres in Edinburgh play an important role within the defined hierarchy of centres. They are spatially dispersed across the City area (see plan on attached Report) and are as 'local' and easily accessed for many consumers as the sequentially preferable town centres or local centres. A key distinguishing feature of Commercial Centres, as opposed to Town and Local Centres, is their ability to more flexibly meet the physical needs and requirements of ever evolving retail and leisure formats, for example largely being free of the historic built fabric constraints. Leisure provision is wholly appropriate within Commercial Centres, complementing the existing retail offer and improving the attractiveness of a centre to consumers and in turn, improving vitality and viability. Market interest for leisure uses at Commercial Centres is clear and additional flexibility to accommodate such uses on sites such as Meadowbank Retail Park is welcome and positive. As established, leisure is already an established use at Meadowbank, with proposals in preparation to build upon this provision.

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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

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

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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

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

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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

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

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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

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

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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: Not Answered

Explanation: Not Answered

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: Not Answered

Explanation: Not Answered

Meadowbank Retail Park, Edinburgh

Representation to City of Edinburgh Council Choices for City Plan 2030





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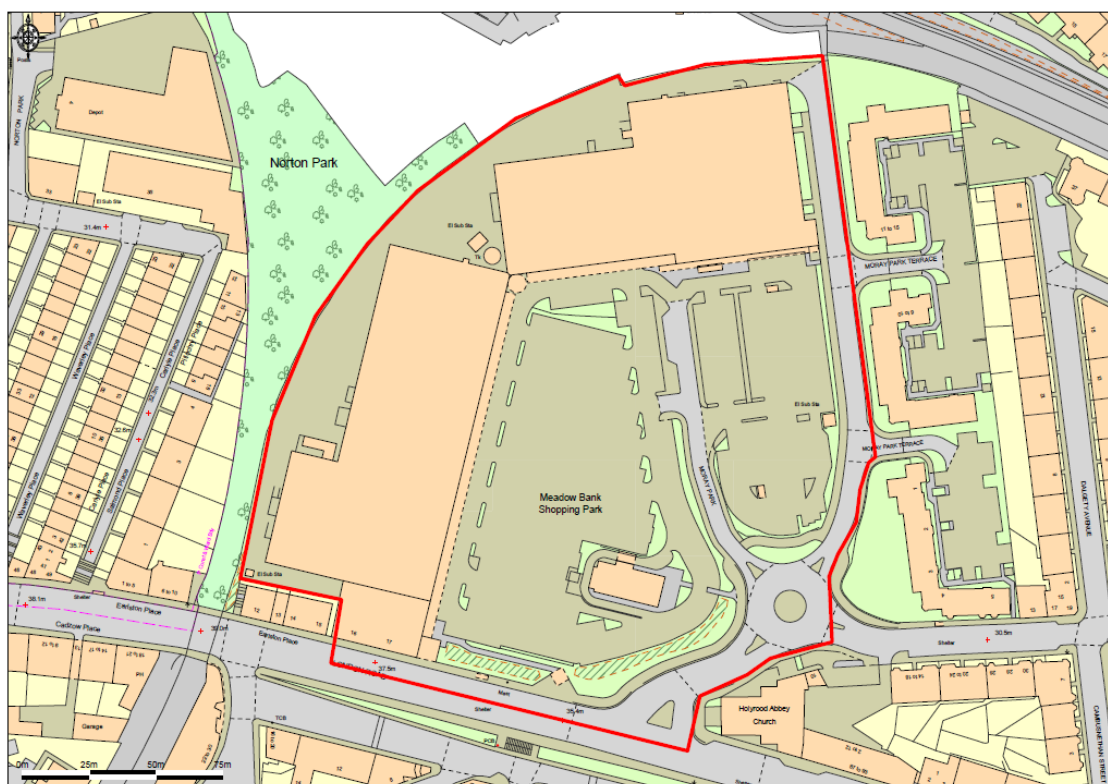
Meadowbank Retail Park, Edinburgh

Representation to City of Edinburgh Council Choices for City Plan 2030



1. Introduction

- 1.1. Savills has been instructed by CBRE Global Investors to submit a representation on their behalf to the City of Edinburgh Council 'Choices for City Plan 2030' (*Choices*) consultation in relation to Meadowbank Retail Park, Edinburgh.
- 1.2. The Retail Park is owned by CBRE Global Investors and is currently identified by the City of Edinburgh Council as a Commercial Centre in the adopted Edinburgh Local Development Plan (2016).



Promap

Location Plan



- 1.3. This representation first provides a description of the asset, the surrounding physical context and the prevailing market context. This is then followed by an overview of the relevant current adopted planning policy context. Commentary is then provided in relation to the relevant Choices questions and the Edinburgh Commercial Needs Study. The final section then sets out our recommendations to the *Choices* consultation.
- 1.4. In summary, the representation:
 - supports the continued zoning of Meadowbank Retail Park as a Commercial Centre
 - submits that an updated existing and future role should be applied to the Retail Park
 - objects to the formal incorporation of the high level conclusions of the Edinburgh Commercial Needs Study into policy

2. The Site and Surrounding Context

The Site

- 2.1. Meadowbank Retail Park opened in 1997 following the grant of reserved matters planning permission in December 1995.
- 2.2. It is situated within the Abbeyhill area, accessed off London Road, to the east of Easter Road. The surrounding context is subject to not insubstantial development activity, with several new residential and student developments coming forward in the area totalling 630 units and 698 beds respectively, alongside a hotel and the new sports centre, which is currently under construction having replaced the former stadium.
- 2.3. The Park itself currently extends to 11 units, and benefits from 559 car park spaces. The current operator line-up comprises:

Meadowbank Retail Park Subdivision	Occupier
Unit 1	Poundstretcher
Unit 1A	Barnardo's
Unit 1B	Venture Photography
Unit 2	Buzz Bingo
Unit 3	TK Maxx Home (+ Foodstore Consent)
Units 4 & 5	TK Maxx
Unit 6	B&M Homestore
Unit 7	M&S Outlet
Unit 8	Poundland
Units 9 & 10	Sainsbury's
Drive Thru	KFC

- 2.4. The Park benefits from a 'Commercial Centre' designation under the adopted Edinburgh Local Development Plan 2016.
- 2.5. Proposals are in preparation in accordance with market demand which, if approved, will allow the existing convenience retail, food/beverage and leisure offer to be materially improved upon at the Park.

Site Context

- 2.6. The Commercial Centre is located off the main arterial route of London Road, along which a large number of bus services operate. A number of local communities – Hillside, Abbeyhill, Meadowbank, Easter Road, Leith, Piershill, Willowbrae, Northfield, Lochend and Craigentenny – are all in close proximity. The City Centre is also just a short walk away to the west.

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- 2.7. As such, there are over 50,000 people within a 5 minute drive time of Meadowbank Retail Park (a significant proportion of which can be reached within a 15 minute walk).
- 2.8. The Council's own Supplementary Guidance on Leith Town Centre (April 2017) recognises that the *"Leith Ward has the highest population density in the city and is one of the most densely populated areas in the UK. There are over 16,000 residents that are within an easy walking distance of the town centre boundary"* (p.1).
- 2.9. As outlined above, the resident population and visitors to Meadowbank Retail Park are increasing, owing to recent developments and the development pipeline in the area. New housing development has been completed at 1-11 Dalgety Road (51 units) and is underway/part-completed at Abbey Lane (16/00770/FUL, 139 units) and Lawrie Reilly Place (Urban Eden/Places for People, 12/03574/FUL, 210 units), whilst 30 flats have been approved at 65 London Road (17/03633/FUL). New student accommodation has been delivered at Shrub Hill (Ref: 06/05371/FUL), Haddington Place (14/03513/FUL) and Elm Row / Montgomery Street (Ref: 11/02696/FUL). Further student accommodation will likely come forward in the short to medium term along London Road (18/05174/PPP, 18/00154/PPP and 19/01149/FUL).
- 2.10. Proximity to the Edinburgh St. James development and a new hotel at Baxter's Place will also contribute positively to the wider area, helping to stimulate this increase in residents and visitors.

Commercial Context

- 2.11. As is well documented, in the face of internet retailing and wider trends, national multiple retailers have for some time been 'right sizing' their portfolios, whilst the shopping 'experience' is ever more important for physical (non-internet) leisure-based retail. This is necessitating, not only modern floorplates and interesting spaces to showcase brands and lifestyles, but increased flexibility of use to ensure expected amenities are provided for.
- 2.12. Fundamentally, it is accepted by most commentators that the inherent value of town centres - or any other defined centres – **lies in their place as a point of interaction and exchange in which commerce, work and leisure are intertwined**. The key goal which policy should work towards must be the creation of sustainably accessible places which people are drawn to and want to visit.
- 2.13. As such, greater flexibility to current arrangements to support alternative – but still footfall-generating – uses within the network of centres is strongly supported. The changing demands for 'prime' floor space and the reintroduction of the supercharged St James Centre in 2021 – comprising some 850,000 sq ft of quality retail, food and leisure floor space, or 21% of Edinburgh city centre's entire retail offer – means there is clear scope and capacity to move on from the now historic worldview that retailing must be dominant within a centre.
- 2.14. Edinburgh is a global city in high demand from all aspects of the property sector including residential and commercial. Macro socio-economic, technological and environmental changes will continue influence, generate and challenge commercial demand and opportunities, meaning the hierarchy of centres needs to be more dynamic and flexible than ever. Accordingly, the City Plan must allow for the flexibility required to be sufficiently agile to stimulate ideas and harness investment potential for the City.

Meadowbank Retail Park, Edinburgh

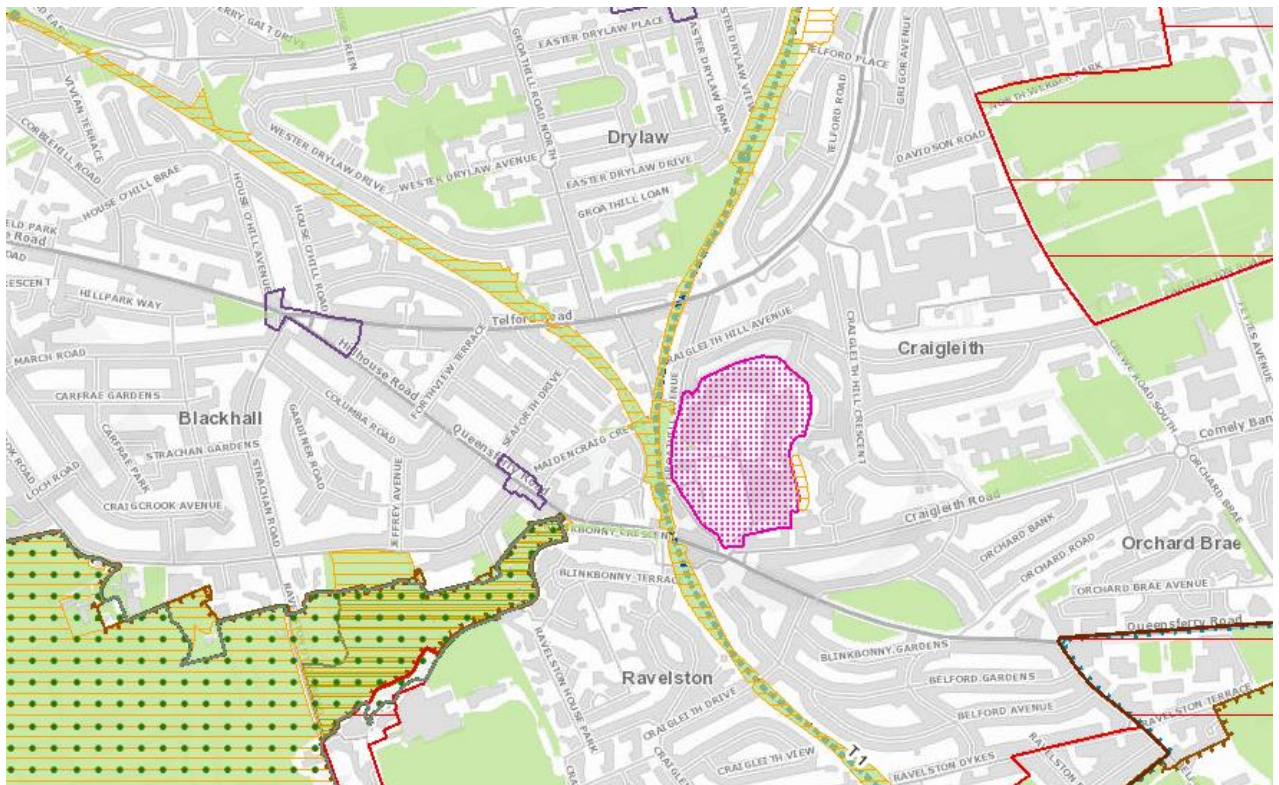
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3. Planning Policy Context

- 3.1. The **Edinburgh Local Development Plan 2016 (LDP)** is the adopted Plan currently governing land use planning decisions for the subject site.
- 3.2. Paragraph 239 sets out the Council’s Objectives with regard to shopping and leisure uses:
 - *“To sustain and enhance the city centre as the regional focus for shopping, entertainment, commercial leisure and tourism related activities and encourage appropriate development of the highest quality*
 - *To maintain the existing and proposed broad distribution of centres throughout the city and sustain their vitality and viability*
 - *To ensure that some basic convenience provision is made or retained within walking distance of all homes*
 - *To improve the appearance, quality and attractiveness of all centres”.*
- 3.3. With respect to the defined retail hierarchy, Meadowbank Retail Park is a designated Commercial Centre.

Adopted Edinburgh LDP 2016 - Proposals Map Extract [Commercial Centre = pink hatch]



- 3.4. Table 7 sets out the role of each Commercial Centre. Meadowbank is summarised as follows:

Smaller retail park with supermarket and high representation of homeware and clothing stores. Located in North East Edinburgh on major transport route with good bus services. Opened 1997. Currently has 10 units.

- 3.5. In terms of the identified 'Current Commitments and Future Role', Table 7 simply states that there are no current proposals for expansion, reconfiguration or enhancement.
- 3.6. Two retail policies are key to the assessment of the proposals within Commercial Centres.
- 3.7. Policy Ret 1 'Town Centres First' establishes that:

"Planning permission will be granted for retail and other uses which generate a significant footfall including commercial leisure use, offices, community and cultural facilities and where appropriate libraries, education and healthcare facilities following a town centre first sequential approach in the following order of preference:

- *Town centres (including city and local centres)*
- *Edge of town centre*
- *Other commercial centres as identified in the plan*
- *Out of centre locations that are or can be made accessible by a choice of transport modes.*

Where a retail or leisure development with a gross floorspace over 2,500sq.m. or occasionally for smaller proposals, if proposed outwith a town centre and contrary to the development plan, a retail impact analysis will be required sufficient to demonstrate that there is no significant adverse effect on the vitality and viability of existing town centres. Town and local centres within adjoining council areas will also be considered when assessing retail impact if they fall within the intended catchment area of the proposal."

- 3.8. Policy Ret 4 'Commercial Centres' provides additional assessment criteria relevant to the subject development site:

"Proposals for additional retail floorspace in a Commercial Centre (see Table 6 and Proposals Map) will not be supported unless it can be demonstrated that:

- *the proposal will address a quantitative or qualitative deficiency within its catchment area, and will be restricted to a scale which makes good this deficiency*
- *all potential town centre and edge of town centre options (including the city centre retail core) have been thoroughly assessed and can be discounted as unsuitable or unavailable*
- *the proposal will not have significant adverse individual or cumulative impacts on any other town, local or commercial centre and, in particular, will not impact adversely on the strategy and objectives for enhancing the vitality and retail attractiveness of the city centre retail core*
- *the scale, format and type of development proposed is compatible with the future role of the centre as defined in relevant planning consents and outlined in Table 7*
- *the proposal will assist in making the centre more accessible by public transport, walking and cycling, contribute to less car travel, and will improve the appearance and environment of the centre."*

- 3.9. Clearly, the current challenge is to how best amend the above to harness commercial improvements across the network of centres and wider city area, where appropriate.

4. Choices Response

- 4.1. In acknowledging the evolving built and commercial contexts to Meadowbank Retail Park, we provide the following commentary on the key Choices for the new Edinburgh City Plan 2030 as to how it will shape and direct development for the next decade.

Choice 10C. 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?

- 4.2. New policy provisions supporting increased use flexibility in commercial centres to accommodate mixed uses including housing are fully supported.
- 4.3. Clearly, housing complements existing retail floorspace and helps to best utilise available land and create sustainable mixed use communities within the urban area. In such circumstances, increased land efficiencies and densities around existing amenities and infrastructure is sustainable and wholly desirable in planning and commercial terms.

Choice 15A. 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?

- 4.4. Yes, the continuation of the broad ‘town centre first approach’ in accordance with national policy is accepted.
- 4.5. Notwithstanding, this must be sufficiently nuanced and flexible to ensure that investment opportunities are not lost to the locale, and wider City, which would benefit and create greater public access to amenities. Clearly there are numerous occasions where development either cannot be accommodated within the City Centre (for instance on account of space requirements) or would not be appropriately accommodated within the City Centre (for instance in meeting a local requirement/need). The policy instruments of the sequential approach and use-appropriate impact assessments continue to have relevance and purpose in this regard.

Choice 15B. 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?

- 4.6. We do not agree with the approach outlined at Choice 15B. It is questionable as to the weight that can be afforded to the ECNS for development management purposes as it was plainly not prepared as a Development Management tool, but to provide background information for the preparation of this City Plan. It does not, and could not, anticipate the site specific detail that is required to appropriately assess individual retail and leisure development proposals.

- 4.7. The Edinburgh Commercial Needs Study (ECNS) undertook a high level, broad brush analysis of retail deficiencies for the City of Edinburgh. This report *inter alia* concluded that, for the City as a whole: “*The convenience retail capacity study suggests that Edinburgh is currently well endowed with supermarkets and discount foodstores generally. The scope for servicing additional new convenience floorspace over and above the current consents will mostly be in the form of trade diversion from existing stores, rather than reliance on spare capacity. This situation still presents opportunities to improve the quality, range and choice of existing convenience stores generally.*”
- 4.8. The ECNS identifies five separate catchment ‘zones’ across the whole of Edinburgh. The boundaries drawn are arbitrary ‘zones’ and have no relationship to retail and leisure expenditure patterns nor any specific retail development catchment or defined Centre.
- 4.9. The correct policy test to address retail impact and deficiencies is clearly concerned with the catchment area of a proposal. There is no suggestion in the ECNS that the identified ‘zones’ are appropriate catchment areas for any particular retail or leisure proposal (due to their scale).
- 4.10. In considering a proposal for new retail or leisure development, the ‘zones’ identified in the ECNS should not be viewed as appropriate given the distinct need to assess the (local) catchment area of the proposal which could be significantly smaller than the identified ‘zones’ in the ECNS.

Assessment of Deficiencies

- 4.11. In exploring the above further, the boundaries used for the ECNS zones do not relate to retail and leisure expenditure patterns nor any specific retail development catchment or defined Centre and the existence of very high levels of expenditure flows between different ‘zones’. The quantitative analysis that was undertaken in the ECNS that led to the quoted conclusion above (para 2.52) did not consider quantitative or qualitative deficiencies within local catchments, instead being based on five broad ‘zones’ within the City (see Section 7 and Table 7.1).
- 4.12. For instance, Zone 2 takes in an extensive area containing several catchments and vastly different and distinct areas of West Edinburgh (Ravelston, Blackhall, Craighleith etc.), Inverleith, Canonmills, Granton, Pilton and Leith, stretching as far west as Restalrig and Seafield in the East. **It is not reasonable or credible to apply these conclusions in a blanket fashion to planning application proposals, and assume that all residents in these broad ‘zones’ have equal access.** Moreover, the quantitative ‘over provision’ across this whole area argued by the ECNS can largely be explained by the slower than expected progress of new housing across the Waterfront, whereby, for example, an extensive Morrisons superstore (which at UK National Averages would have a turnover of c. £40m) was effectively delivered ahead of the anticipated housing. Clearly, this historic delivery issue is however changing, with several new housing developments now on site (from the 132 unit Link ‘Plot 27’ site to the 388 unit CALA development at Ocean Terminal/Waterfront Plaza) or recently consented/programmed in (e.g. 938 unit Forthside development at Western Harbour), with ‘infrastructure first’ proposals now advancing to facilitate the delivery of c. 3,500 new homes in Granton (from 2022/23 to 2037).

- 4.13. An assessment of City-wide retail capacity does not assist in assessing whether or not there are significant quantitative retail deficiencies within any local area within the City. Therefore, the ECNS only provides limited information that can be used for assessing whether or not a development does, or does not, address quantitative retail deficiencies (as indicated in the policy tests). Policy tests currently focus on whether or not there are deficiencies within the catchment area of the development proposal and not arbitrarily defined parts of the City. They should continue to do so.
- 4.14. **As such – and in line with the provision of the current LDP – a finer grain analysis reflecting the reality of local catchments is required to allow development management decision to be sufficiently informed** when assessing proposals for new retail and leisure developments.
- 4.15. For the reasons outlined above this representation **does not agree** with the approach set out above in Issue 15B. It is strongly advised that this is revised as matters progress to the Proposed City Plan 2030.

Choice 15E. 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?

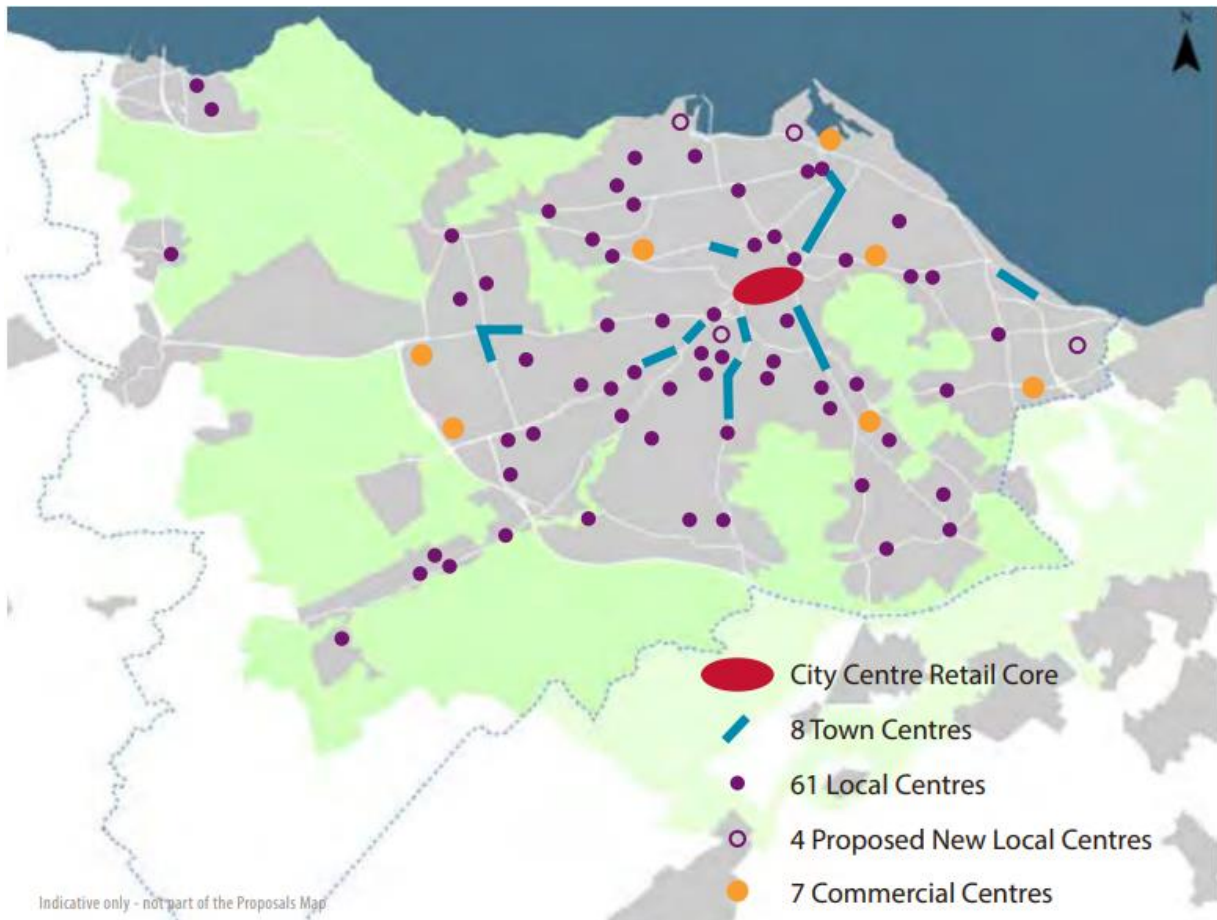
- 4.16. New policy provisions supporting increased use flexibility in commercial centres to accommodate mixed uses including hotels are fully supported.
- 4.17. Clearly, within the city area, hotels complement existing retail offer and help to best utilise available land to create sustainable mixed use communities. In such circumstances, increased land efficiencies and densities around existing amenities and infrastructure is sustainable and wholly desirable in planning and commercial terms.

Choice 15F. 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?

- 4.18. We agree that there should be flexibility for Commercial Centres to meet with market requirements, in respect of both retail and leisure.
- 4.19. With regard to **Choice 15G**, it is considered that the seven existing Commercial Centres in Edinburgh play an important role within the defined hierarchy of centres. They are spatially dispersed across the City area (see plan below) and are as 'local' and easily accessed for many consumers as the sequentially preferable town centres or local centres.
- 4.20. A key distinguishing feature of Commercial Centres, as opposed to Town and Local Centres, is their ability to more flexibly meet the physical needs and requirements of ever evolving retail and leisure formats, for example largely being free of the historic built fabric constraints.

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- 4.21. Leisure provision is wholly appropriate within Commercial Centres, complementing the existing retail offer and improving the attractiveness of a centre to consumers and in turn, improving vitality and viability.
- 4.22. Market interest for leisure uses at Commercial Centres is clear and additional flexibility to accommodate such uses on sites such as Meadowbank Retail Park is welcome and positive. As established, leisure is already an established use at Meadowbank, with proposals in preparation to build upon this provision.

Choice 16A.2. We want to support office development at commercial centres as these also provide accessible locations.

- 4.23. New policy provisions supporting increased use flexibility in commercial centres to accommodate mixed uses including offices are fully supported.
- 4.24. Clearly, within the city area, offices complement existing retail offer and help to best utilise available land to create sustainable mixed use communities. In such circumstances, increased land efficiencies and densities around existing amenities and infrastructure is sustainable and wholly desirable in planning and commercial terms.

5. City Plan Recommendations

- 5.1. This Representation has established both the changing built and commercial contexts to Meadowbank Retail Park, which has allowed for informed commentary on the key choices for the new Edinburgh City Plan 2030 as to how it will shape and direct development for the next decade.
- 5.2. Locally to Meadowbank retail Park, a number of developments have been delivered or are in the pipeline, increasing the mixed tenure density of an already populous and diverse area.
- 5.3. The inherent value of the network of centres – of which Meadowbank Retail Park forms part – **lies in their place as a point of interaction and exchange in which commerce, work and leisure are intertwined**. The key goal which policy should work towards must be the creation of sustainably accessible places which people are drawn to and want to visit.
- 5.4. Macro socio-economic and technological changes will continue influence, generate and challenge commercial demand and opportunities, meaning the hierarchy of centres needs to be more dynamic and flexible than ever. Accordingly, the City Plan must allow for the flexibility required to be sufficiently agile to stimulate ideas and harness investment potential for the City.
- 5.5. As such, greater policy flexibility to that which exists currently should be incorporated within City Plan 2030 to support alternative – but still footfall-generating – uses within the network of centres. Proposals are already in preparation at Meadowbank in accordance with market demand which, if approved, will allow the existing convenience retail, food/beverage and leisure offer to be materially improved upon at the Park.
- 5.6. Correspondingly, and with specific reference to our client's property interests at Meadowbank Retail Park, this representation:
 - supports the continued zoning of Meadowbank Retail Park as a Commercial Centre;
 - submits that an updated existing role be applied to the Park, recognising its existing (and approved) convenience goods retail, comparison goods retail, service and leisure uses in operation;
 - submits that an updated future role be applied to the Park, whereby initiatives to improve upon the Park are supported. In accordance with Choices 15E, 15F, 16A.2 and 10C, this could involve hotel, leisure, office and even residential uses being introduced alongside that which exists at the Park; and,
 - objects to the formal incorporation of the high level conclusions of the Edinburgh Commercial Needs Study into retail policy.

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