

Customer Ref: 01732 Response Ref: ANON-KU2U-GPUA-M
Name: Rob Newton
Response Type: Agent / Consultant
On behalf of: Cinnamon Sedge LLP

Supporting Info: Yes
Email: robert.newton@avisonyoung.com

Choice 1 A

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

Short Response: 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

Explanation

Choice **1 D**

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

Short Response

Explanation

Choice **1 E**

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

Short Response

Explanation

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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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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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Response Type

On behalf of:

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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Response Type

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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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On behalf of:

Supporting Info

Email

Choice 5 D2

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

Short Response

Explanation

Choice 5 E

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

Short Response

Explanation

Choice 6 A

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

Short Response

Explanation

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Choice **6 B**

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

Short Response

Explanation

Choice **7 A**

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

Short Response

Explanation

Choice **7 B**

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

Short Response

Explanation

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Supporting Info

Email

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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Response Type

On behalf of:

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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Supporting Info

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Choice **10 B**

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

Short Response

Explanation

Choice **10 C**

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

Short Response

Explanation

Choice **11 A**

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

Short Response

Explanation

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Choice 11 B

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

Short Response Not Answered

Explanation Not Answered

Choice 12 A

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

Short Response Not Answered

Explanation 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

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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

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Email

Choice **12 B5**

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

Short Response

Explanation

Choice **12 B6**

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

Short Response

Explanation

Choice **12 B7**

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

Short Response

Explanation

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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:

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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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Response Type

On behalf of:

Supporting Info

Email

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

Choice 15 B

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

Short Response

Explanation

Choice 15 C

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

Short Response

Explanation

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Choice 15 D

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

Short Response

Explanation

Choice 15 E

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

Short Response

Explanation

Choice 15 G

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

Short Response

Explanation

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Response Type

On behalf of:

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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Response Type

On behalf of:

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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Email

Response Type

On behalf of:

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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Response Type

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Supporting Info

Email

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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On behalf of:

Supporting Info

Email

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 Land at Royal Elizabeth Yard, being a brownfield site, is being promoted as a suitable location for additional new modern business and industrial space. Please refer to the full terms of the representation document which has been separately submitted and which sets out the case for this proposal.

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 Land at Royal Elizabeth Yard, being a brownfield site, is being promoted as a suitable location for additional new modern business and industrial space. Please refer to the full terms of the representation document which has been separately submitted and which sets out the case for this proposal.

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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

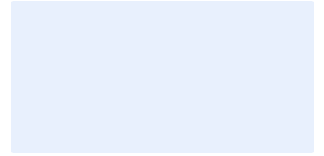
Explanation

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



Representations to Choices for CityPlan 2030 In respect of Royal Elizabeth Yard

On behalf of Cinnamon Sedge LLP

April 2020



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Appendix 1 - Royal Elizabeth Yard – Development Strategy prepared by OPEN

Appendix 2 - Transport Overview prepared by ECS Transport Consultant Ltd

Appendix 3 - Schedule of Industrial Sites identified for housing

Appendix 4 - Bonded Warehousing and Distillery Industry Hub at REY – advice by Lewis Sutton Property Consultants

Prepared By: Caroline Nutsford

Status: Final

Date: April 2020

For and on behalf of Avison Young (UK) Limited

1. Introduction

- 1.1 These representations are submitted by Avison Young on behalf of our client Cinnamon Sedge LLP and relate to land within our client's ownership at Royal Elizabeth Yard (REY), near Dalmeny, Edinburgh.
- 1.2 Royal Elizabeth Yard comprises a multi-let industrial site. The site is strategically situated to the north west of Edinburgh, lying between South Queensferry/Dalmeny and Kirkliston and has good access to the A90/Forth Bridges, M8 and M9 motorways.
- 1.3 Royal Elizabeth Yard extends to approximately 19.7 hectares and comprises approximately 190,132 sq ft of industrial accommodation. This is arranged over 37 units comprising 8 large industrial warehouse sheds and a number of smaller buildings. Unit sizes range from 250 sqft to 19,000 sq ft.
- 1.4 A site location plan and aerial image of the site is provided below.





1.5 The site is currently well-let with existing tenants including:

- Underbelly;
- Catalyst;
- William Kirkpatrick;
- Powder Design;
- Collinson Ceramics;
- Form Access;
- Edinburgh Bicycle Co-operate
- Thompsons Tippers
- Continental Wine and Food
- National Galleries Scotland
- Mr J Peterson
- ECE Associates.

1.6 Royal Elizabeth Yard was originally developed in the 1940s as a depot to supply food and beverages to the Royal Navy at Rosyth.

1.7 Further details on the site and its surrounding context is set out in Appendix 1.

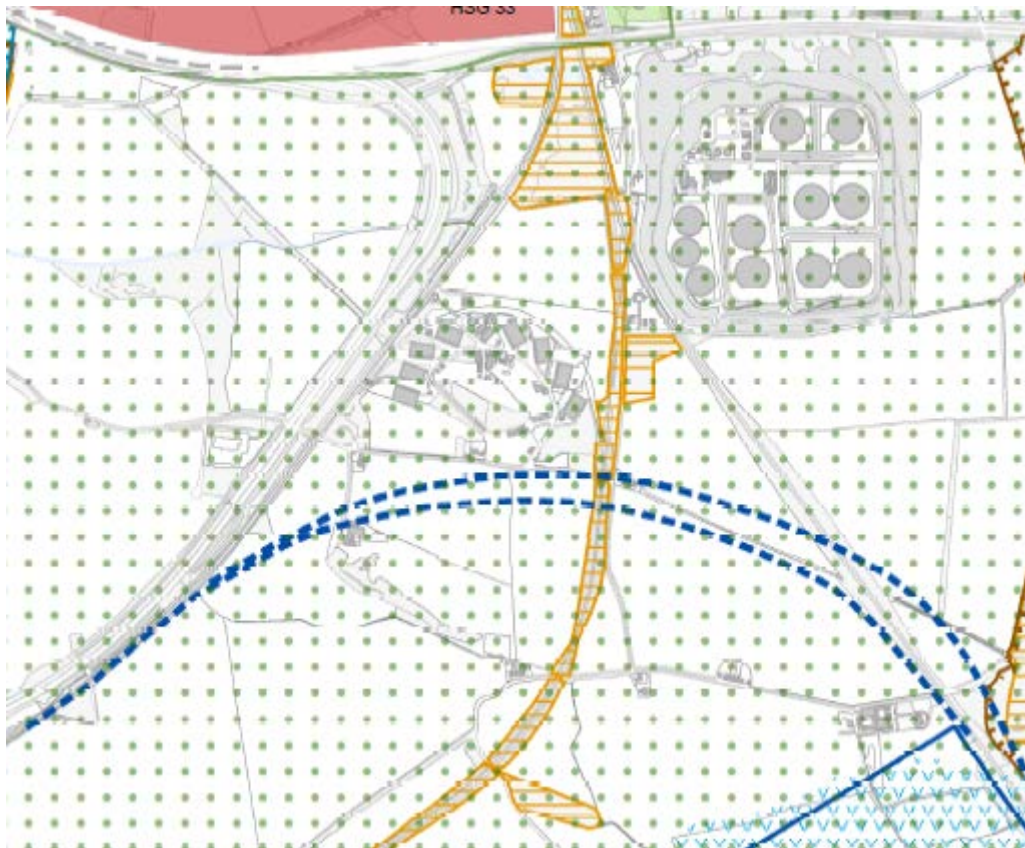
Scope of Representations

- 1.8 These representations to Choices for City Plan 2030 relate to Choice 16 – Delivering Office, Business and Industrial Floorspace. As set out in detail in the subsequent section, our representations seek the following:
- The allocation of Royal Elizabeth Yard as an existing business and industrial site in recognition of its existing economic value;
 - As part of a green belt review, consideration to the removal of Royal Elizabeth Yard from the green belt;
 - Given the potential of the site to accommodate further industrial development, identification of Royal Elizabeth Yard for new modern industrial and ancillary development to help provide necessary industrial floorspace.
- 1.9 These representations are supported by a Development Strategy which has been prepared by OPEN (Appendix 1) and a Transport Statement which has been prepared by ECS (Appendix 2).

2. Representations

Allocation as an existing Business and Industry site

- 2.1 As outlined in section 1, Royal Elizabeth Yard is a well-established business/industrial park. It extends to 19.7ha, provides approximately 190,000 sq ft of industrial floorspace and offers accommodation for a wide range of occupiers. The site is well-let and therefore plays an important role in providing jobs, investment opportunities and helps to meet the city's industrial needs.
- 2.2 In the current adopted Edinburgh Local Development Plan 2016, Royal Elizabeth Yard is not identified as an existing business and industry area and is a brownfield site which lies within the green belt. 'Brownfield land' is defined in the glossary of the Edinburgh LDP as "land which has been previously developed", as indeed it is in Scottish Planning Policy also. In this particular case, it is therefore beyond any doubt that the site in question is brownfield. As we come onto further below, development should always be directed to brownfield land in the first instance. An extract of the adopted Edinburgh Local Development Plan 2016 proposals map is provided below.



- 2.3 Given the extensive industrial offering on the site, as outlined in section 1, it is recommended that Royal Elizabeth Yard should be identified in City Plan 2030 as a "Business and Industry Area" to recognise the site's economic value. This policy designation aims to retain a range of employment sites across the city where new and existing business can operate, expand or relocate.

Removal from the Green Belt

- 2.4 Royal Elizabeth Yard is a brownfield site in the green belt. The green belt is defined in the LDP glossary as *“Land defined in the adopted local plans or local development plans which protects and enhances the landscape setting and identity of Edinburgh and protects and gives access to open space around the city and smaller settlements”*. As a brownfield site, it stands to reason that Royal Elizabeth Yard is incompatible with the reasons for including land within the green belt. The Choices document advises that the proposed City Plan 2030 will make green belt amendments as technical changes. As a part of its green belt review and in light of the observations above, the Council should also consider the removal of REY from the green belt. Notably, in the early stages of preparing the (now adopted) Edinburgh City Local Plan, the site was included as one of five sites suggested for removal from the green belt.
- 2.5 Paragraph 51 of Scottish Planning Policy relates to green belts and states:
- “The spatial form of the green belt should be appropriate to the location. It may encircle a settlement or take the shape of a buffer, corridor, strip or wedge. Local Development Plans should show the detailed boundary of any green belt, giving consideration to”*: (inter alia)
- *“excluding existing settlements and major educational and research uses, major businesses and industrial operations, airports and Ministry of Defence establishments”*.
- 2.6 As a large scale industrial operation, the removal of Royal Elizabeth Yard from the green belt, would accord with the above. Furthermore, the removal of Royal Elizabeth Yard from the green belt would not impact on the overall objectives of green belts which are set out in SPP as: to direct development to the most appropriate locations and supporting regeneration; protecting and enhancing the character, landscape setting and identity of the settlement; and protecting and providing access to open space.
- 2.7 Alternatively, if CEC’s green belt review does not identify the site for removal from the green belt, it is considered that the site should be identified as an existing business and industry area “washed over” by the green belt. This would not be dissimilar to examples in the current local development plan e.g. RBS at Gogarburn, which is identified as a special economic area in the green belt.

Proposals for new modern business and industry sites

- 2.8 A key part of City Plan 2030 is to ensure that the city has enough business and industrial space. Under choice 16A, the Council is looking to identify proposals for new modern business and industrial sites to provide necessary floorspace to meet the city’s business and industry needs. Presently, Choices identifies sites for new business and industrial floorspace at Leith Docks; Newbridge; Newcraighall Industrial Estate and Crosswinds.
- 2.9 The Royal Elizabeth Yard site has the potential to accommodate further industrial development and accordingly should be identified in City Plan 2030 as a proposed site for new modern industrial uses. SPP advises that *“Planning should direct the right development to the right place”*. This includes: *“considering the re-use or redevelopment of brownfield land before new development takes place on greenfield sites”*

(paragraph 40). As a brownfield site, with already well-established industrial units, Royal Elizabeth Yard meets this requirement and is considered the 'right place' for further industrial development.

2.10 Further justification for this is set out below.

Potential of site to accommodate further development

2.11 The principle of industrial development is well established at Royal Elizabeth Yard with the site being a successful business/industrial park. The existing units on-site are currently well let and it is clear that the site therefore functions well in the location.

2.12 The site is currently inefficient with large areas of underutilised and redundant space. Indeed, at present, only around 25% of the site is currently utilised for development. The brownfield site clearly has the capacity to accommodate further development.

2.13 As part of a Development Strategy (see appendix 1), OPEN has assessed the ability of the site to accommodate further development in landscape and visual terms. This has considered the site's landscape character, its landform and, through a visual survey, assessed the impact new development would have on the landscape. Significantly, while the site lies in an area which is rural in character, OPEN's assessment demonstrates that the introduction of new development within the site area would not substantially alter the visual amenity or character of the area. Views into the site are limited predominantly to close up views, and new development would sit within the context of the existing development on the site. Retention and reinforcement of existing landscaping as part of new proposals would further limit the degree of development which would be visible.

2.14 In 2019, CEC undertook a landscape and visual assessment across the city which included the Royal Elizabeth Yard site. While this was undertaken in the context of assessing the potential for residential development, its findings support OPEN's recent assessment that the site is able to accommodate further development. CEC's assessment concluded that the site is reasonably well screened due to its low lying nature and woodland and that development would not affect the strong rural character and high scenic qualities of the landscape and could be visually discrete.

2.15 In terms of deliverability, OPEN's assessment has also identified that the site is relatively flat and free from constraints. SEPA's floodrisk map demonstrates that there are no constraints on the site in terms of floodrisk.

2.16 The site is situated in close proximity to the Dalmeny Oil Storage Depot, which lies to the north west of the site and falls within the major hazard consultation zones defined by the Health and Safety Executive, as shown in the plan overleaf. When a site is located within the consultation zone of a major hazard site, the HSE can either 'Advise Against' (AA) or 'Don't Advise Against' (DAA) granting planning permission to a proposed development, based on the following criteria;

- The 'consultation zone' that the proposed development lies in; and
- The 'sensitivity level' of the development type.

2.17 There are four sensitivity levels which allow progressively more severe restrictions as the sensitivity of the proposed development increases. Industrial development falls within sensitivity level 1 - People at work,

parking (based on normal working population. Providing for less than 100 occupants in each building and less than 3 occupied storeys).

2.18 The levels of sensitivity and consultation zone determine HSE's advice (see matrix below)

Level of Sensitivity	Development in Inner Zone	Development in Middle Zone	Development in Outer Zone
1	DAA	DAA	DAA
2	AA	DAA	DAA
3	AA	AA	DAA
4	AA	AA	AA

DAA = Don't Advise Against development

AA = Advise Against development

2.19 On the basis of the above, the HSE would be unlikely to advise against further industrial/warehouse development across the site and the HSE Consultation zone would not impact upon delivering further industrial uses across the site.



Accessibility and transport

2.20 ECS Transport Planning Ltd has undertaken a transport review of the site to assess its potential, in transportation terms, to accommodate further development. Their full report is enclosed at appendix 2. In summary, they have identified the following:

- As an established industrial site, the principle of development in this location is already established in transport terms.
- The site benefits from excellent road access to Fife and the North via the A90/Forth Bridge, whilst West and Central Scotland can be easily accessed by the M8 and M9 connections that lie in close proximity.
- The local road network accommodates existing traffic at Royal Elizabeth Yard with no recorded accident or operational issues.
- Access into the site has significant reserve capacity to accommodate additional development on the site.
- The site is and/or can be made accessible by a range of sustainable transport infrastructure and public transport services.
- Traffic generated by further industrial uses and subsequent impact on surrounding road network is expected to be minimal (and would be fully tested as part of any detailed proposals).
- The principle of intensification of industrial uses is viable from a transportation perspective.

Industrial need

2.21 Choices identifies that *"City Plan 2030 will need to ensure that we have enough business and industrial floorspace to meet the City's demand..."*

2.22 The Council's Commercial Needs Study 2018 identifies the following:

- There is a presumption in favour of retaining industrial uses at strategic locations
- The majority of Edinburgh's industrial stock is now at least 40 years old and is beginning to exhibit obsolescence
- Market demand is steady; demand is increasingly towards strategic locations with good transportation links on the edge of urban Edinburgh
- Some ageing inner urban industrial premises are being redeveloped for alternative uses
- There is a need to replace lost industrial floorspace and modernise the stock
- There is a 12 year requirement for 81,000sq.m of new build industrial premises requiring 27 hectares of land.

2.23 At a strategic level, the findings and recommendations of the Commercial Needs Study support the consolidation and enhancement of Royal Elizabeth Yard as a strategic location for economic / industrial development and support its intensification as a proposed site for new modern industrial use to meet the City's industrial needs.

2.24 There is now an even greater need to identify further land for new industrial uses given the Council's preferred approach to housing land set out under Choice 12. This sets out that it is the Council's preferred

option for all new homes to be delivered by the Council and its partners within the urban area. This will require these homes to be delivered on 275 hectares of current employment land.












- 2.25 As part of the supporting documents to 'Choices' a Housing Study has been undertaken by the City of Edinburgh Council to assess a variety of sites within the city with potential for housing. Through this assessment, a large number of existing industrial sites have been identified as being suitable for housing led mixed use development which could result in the loss of existing industrial stock. These sites are set out in appendix 3 and we estimate, would total over 87 hectares of industrial uses across 69 sites. While all these sites may not come forward for the delivery of housing, it is clear that this could lead to a significant displacement of industrial land which would be required to be accommodated elsewhere within the city.
- 2.26 It is clear from the above that new locations need to be identified for further industrial floorspace to meet the city's needs and to replace existing floorspace which is now out of date or likely to be lost to other uses. Royal Elizabeth Yard presents an excellent opportunity to deliver new and improved industrial floor space to help meet the city's business/industry needs and should be identified as a proposed site in City Plan 2030.
- 2.27 The Council's Commercial Needs Study 2018 also identifies that industrial demand is increasingly directed towards strategic locations with good transport links on the edge of urban Edinburgh. Royal Elizabeth Yard is located close to the motorway network and meets this requirement. The fact that the existing units are well let also demonstrates the attractiveness of the location for industrial users.
- 2.28 The site owners can also present their own evidence of demand for further industrial development at the site. This can be found at appendix 4 in the form of advice by Lewis Sutton Property Consultants and relates specifically to the bonded warehousing and distillery industry where strong demand for these uses has been identified. In our submission, this is further evidence to support the principle of industrial uses at the site and that its allocation as a proposed site in City Plan 2030 can therefore be justified.

Royal Elizabeth Yard – Development Strategy

- 2.29 OPEN's development strategy set out in appendix 1 has identified 6 areas of the existing site where further new development could be accommodated. This assessment has demonstrated that the site has the potential to deliver approximately 10.50 hectares of development land for further industrial uses and ancillary development within a brownfield site that is already recognised for similar uses. These could be accessed through the existing site access, with new mixed woodland planting around the perimeter of the site to reinforce existing woodland. The development strategy diagram and key is reproduced below; please refer to section 4.1 of the strategy document for a detailed explanation of these emerging proposals.



Scale 1:2000 @ A3
 0m 20m 40m 60m 80m 100m
 fig. 41: Development strategy

-  Existing Buildings to be retained
-  Existing Yard space to be retained
-  Existing Woodland to be retained
-  Existing Woodland to be re-modelled
-  Existing Trees to be removed
-  Proposed landscape
-  Existing Landscape to be retained
-  Proposed location for SUDs facility
-  Existing Cycle Route
-  Existing Roads
-  Site Boundary

3. Conclusion

- 3.1 On behalf of Cinnamon Sedge LLP, we welcome this opportunity to submit representations to Choices for City Plan 2030. These representations support the identification of Royal Elizabeth Yard as an existing business and industry site and as a proposal to accommodate further industrial uses.
- 3.2 Royal Elizabeth Yard is a well established multi-let industrial site which comprises approximately 190,000sq ft of industrial development. The site plays an import role in providing jobs, investment and delivering industrial floorspace. Accordingly, it should be allocated as an existing business and industry site in City Plan 2030 to recognise its economic value.
- 3.3 As part of a greenbelt review, the site should be considered for removal from the greenbelt as a large scale industrial operation. Alternatively, it could be identified as a business/industrial site washed over by the green belt, similar to the likes of RBS Gogarburn which is a special economic area in the green belt.
- 3.4 The Royal Elizabeth Yard site is inefficient and underutilised and has the potential to accommodate further industrial uses. As such, the site should also be identified in City Plan 2030 as a site for proposed new industrial development to help meet the city's industrial needs. There is a clear need to identify further sites for business and industrial uses given the findings of the Council's Commercial Needs Study and in response to the Council's preferred option for housing which will see a substantial amount of existing industrial sites redeveloped for housing led mixed use development. OPEN's development strategy identifies that the site has the potential to accommodate approximately 10.50 ha of additional development, and has demonstrated that further development would be acceptable in landscape and visual terms and have an acceptable impact on rural character. The principle of intensification for industrial uses is also viable from a transportation perspective.

Contact Details

Enquiries

Caroline Nutsford
0131 469 6068
Caroline.nutsford@avisonyoung.com

Visit us online

avisonyoung.co.uk

Royal Elizabeth Yard, Development Strategy

Representation to the Main issue Report

Client: Avison Young
Document No: 01
Revision: A
Date: April 2020



Project:
Document:
Document Number:

Issue	Revision	By	Approved	Date
First issue	-	xx	xx	xx/xx/xx

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fig. 1: Aerial photo of the site area.

1. Introduction

1.1 Purpose of this document

This document has been prepared by Optimised Environments Limited, 'OPEN' to form a supporting study to the response to the 'Choices for the City Plan 2030' being submitted by Avison Young.

The representation prepared by Avison Young seeks the allocation of the site for Business and Industrial use and the identification of the site as a proposal for new modern industrial development.

The site is an existing industrial site, located within the Greenbelt, approximately 500m south of Dalmeny and 1km north east of Kirkliston. The site extends to approximately 19.7 hectares (48.7 acres), see figure 3 and is used for a variety of commercial operations and warehousing.

In the current adopted Edinburgh Local Development Plan 2016, Royal Elizabeth Yard is not identified as an existing business and industry area and is a brownfield site which lies within the Greenbelt.

This study describes the capacity of the existing site to accommodate additional modern industrial units. This will make more efficient use of the existing land, provide new and additional industrial units and help to address a requirement for specific business and industrial land in the City of Edinburgh. The site is currently fully occupied, however, OPEN believe that through good design additional business and industrial units could be accommodated with minimal impact upon infrastructure or the surrounding landscape.

This document has been prepared to demonstrate how new development on the current brownfield site could be accommodated without negatively impacting upon the landscape setting and surrounding Greenbelt.

1.2 Landscape assessment

A Landscape and Visual Assessment of Greenfield sites was prepared in April 2019 to support the preparation of the Edinburgh City Plan 2030. This study considered opportunities and constraints for housing development on greenfield areas across Edinburgh. The study focused on landscape and visual issues and will form part of the suite of environmental, social and sustainability information evaluated by the Council in the emerging City Plan 2030.

The Royal Elizabeth Yard site was evaluated as part of the study, although it is an existing industrial site, and the Assessment and conclusions on scope for development at Royal Elizabeth Yard concludes;

The site comprises industrial/commercial development, which is reasonably well screened due to its low lying nature and the presence of woodland.

On the eastern boundary of the area a disused rail line provides a cycle and walking route to Dalmeny and South Queensferry. Any housing development replacing the industrial use of this site would be divorced from South Queensferry and contrary to the existing settlement form. It would not however affect the strong rural character and high scenic qualities of the landscape and could be visually discrete. There may be some scope to accommodate development in this area as a replacement for existing buildings.

While this assessment was undertaken in the context of considering residential development, its assessment is of relevance to considering the potential to accommodate other forms of development. OPEN support the findings that there may be some scope to accommodate development in this area as a replacement for existing buildings. Through analysis and development of a strategy, this document will illustrate how the site at Royal Elizabeth Yard could provide a logical and well considered site for the identification of additional business and industrial land. OPEN's findings underpin the view that the site should be identified as an area for Business and Industry, with the potential for growth, and removed from the green belt.

1.3 Structure of the document

The site context

The section of the document provides an overview of the strategic site location and in particular the landscape setting. An analysis of the landscape setting will describe the capacity of the site to accommodate change.

The site

This section of the document will describe the site and identify any opportunities and constraints to further development within the site area.

Development strategy

This section categorises areas of the site based on the analysis and identifies the potential for development within the various areas.

Development proposals

The section provides a description as to how the site could be developed in an appropriate manner, identifying potential development areas, a landscape structure and access strategy. A summary is also included in this section presenting the findings of the study and presenting the response to the City Plan 2030.



fig. 2: Photos of existing uses on the site.



fig. 3: Site location.

2. The site context

2.1 Strategic location

Royal Elizabeth Yard is located approximately 10 miles to the west of Edinburgh city centre. The estate is situated between Kirkliston and South Queensferry and benefits from having excellent access to Fife and the north via the A90/Forth Bridges, whilst west and central Scotland can be easily accessed via the M8 and M9 connections that lie in close proximity. The estate is situated just off the M90 and is entered from Standingstane Road to the East or the B800 (South Queensferry) from the West.

The location, see figure 4, is a key asset of the site, easily accessible without negatively impacting existing roads infrastructure. The accessibility location ensures that the site remains a popular mixed industrial site with a wide range of tenants, see figure 5 opposite.

2.2 Location and access

Figure 4 opposite provides a summary of the key pedestrian and vehicle connections in the area.

Pedestrian and cycle links

Pedestrian and cycle access to the site is possible via Core Path 10/NCR 1 which runs immediately to the east of the site and provides connections to Dalmeny and South Queensferry to the north and Kirkliston to the south.

Public transport

Dalmeny Rail Station is located less than 1.5 miles to the north (accessible via the Core Path) and provides regular services to Edinburgh and the north.

Bus stops are located on the A90 approximately 600m to the north of the site and easily accessed via the Core Path.

Roads

The estate is situated just off the M90 and is entered from Standingstane Road to the East or the B800 (South Queensferry) from the West.

A second minor access point, not currently used, is located approximately 400m west of the main access.

Airport

Edinburgh International Airport is the sixth busiest international airport in the UK and is located 5 miles to the south of South Queensferry.

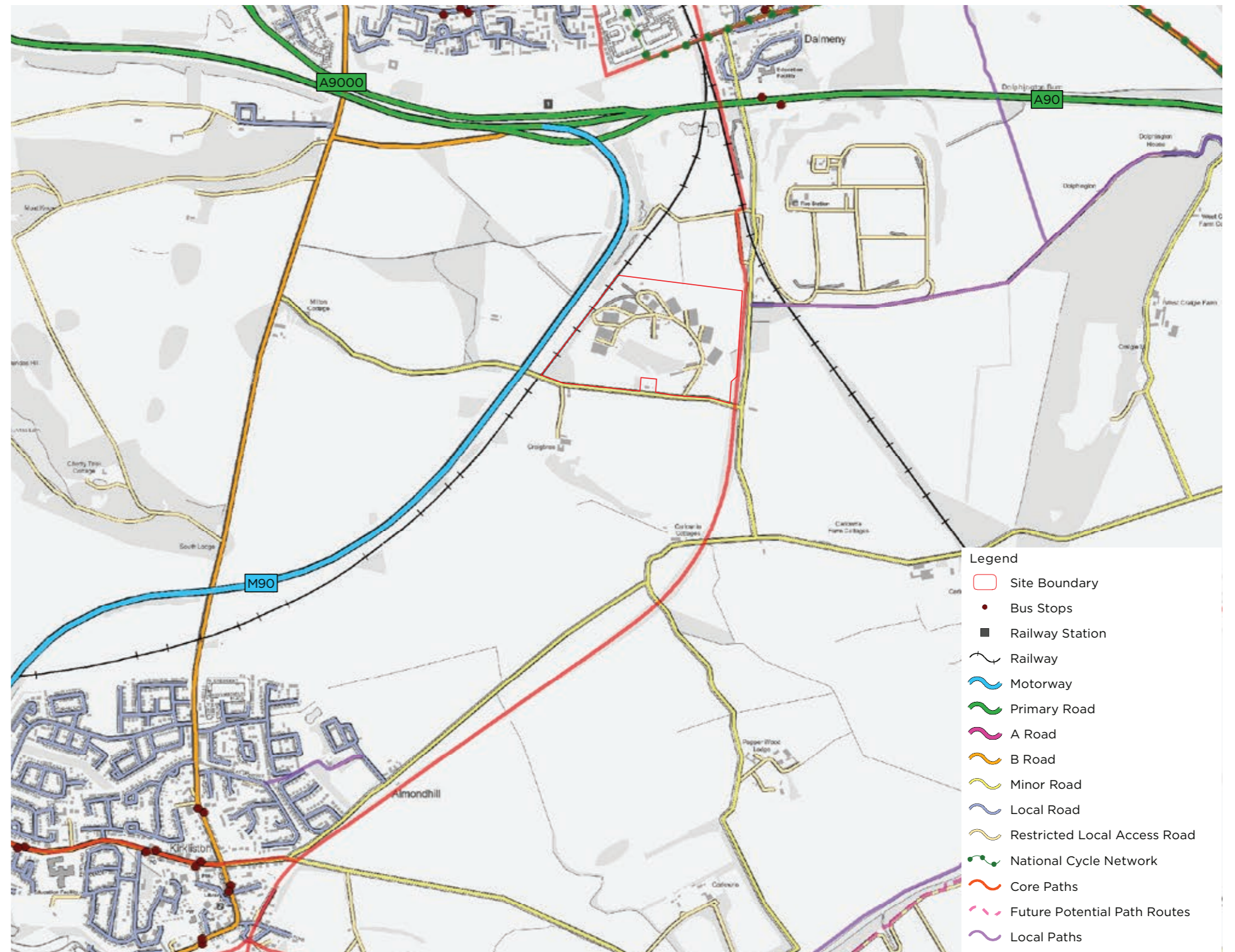


fig. 4: Site connectivity

SITUATION



fig. 5: Current situation

2.3 Designations

In the current adopted Edinburgh Local Development Plan 2016 (LDP), Royal Elizabeth Yard is not identified as an existing business and industry area and is a brownfield site which lies within the Greenbelt. The site is not subject to any landscape designations, which would contribute to or denote a higher valued landscape context either in relation to scenic, cultural or landscape quality. The site and land immediately surrounding the site is identified as Greenbelt land.

The disused railway corridor which encompasses Core Path 10 to the east of the site is designated as Local Nature Conservation Sites (LNCS). The LNCS directly abuts the eastern edge of the site.

2.4 Landscape character

The site lies within a landscape type identified as Settled Farmland within the Edinburgh Landscape Character Assessment (2010). The Key Characteristics include;

- Gently undulating landform;
- Arable farmland, pasture and set aside;
- Settlement extends to the perimeter of this landscape character type and piecemeal built development and communications links may be found within the landscape;
- Woodland and field boundaries are likely to be remnant policies;
- Lack of prominence due to low lying nature of the landscape;
- Fragmented landscape with a mix of land uses.

In relation to the proposed site the Landscape Character Assessment notes;

The Queensferry Fragmented farmland character area comprises a flat to gently undulating area of land to the south west of Queensferry. There are some areas of arable farmland and set aside. A remnant avenue of trees extends west of Dalmeny and there is woodland associated with the railway line. Other significant land uses include the large oil storage depot south of Dalmeny. This area is screened by large bunds with immature woodland planting. Other significant developed features include an area of derelict land and the industrial units at Royal Elizabeth Yard which is a former Royal Naval stores station. The buildings of the Royal Elizabeth Yard are low density with industrial character brick buildings. The area is further fragmented by transport routes including the two converging railway lines which provide access to Fife, and the M9. The different land uses create a fragmented landscape.

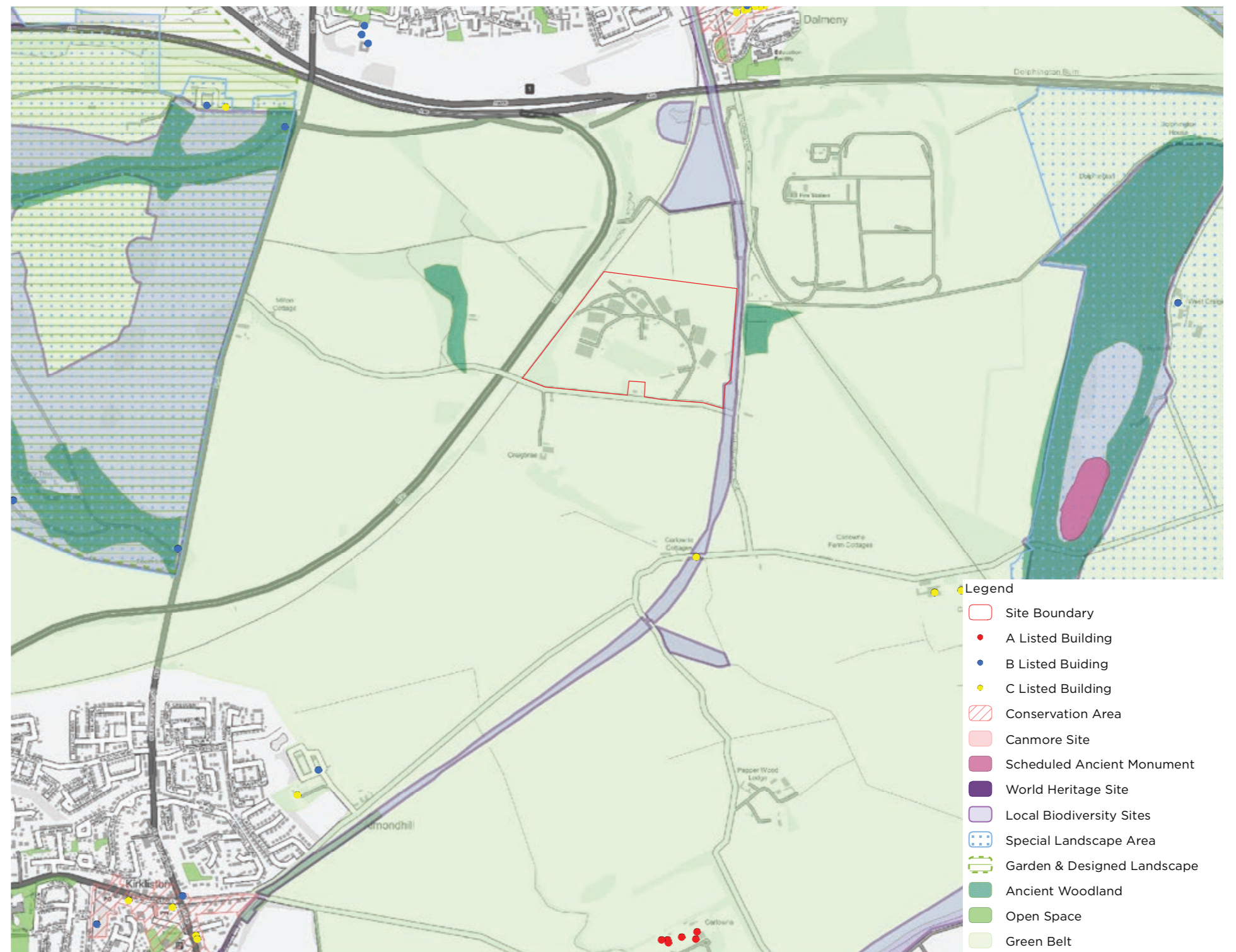


fig. 6: Landscape designations

The landscape character area is quite visually contained due to its low lying topography. The southern edge of Queensferry extends to the fields between the settlement edge and the A90.

Construction of the oil storage depots and bunds is a key development which has affected the landscape character in the past. The construction of the new link of the M9 to the Forth road bridge contributes to the fragmented nature of the landscape character area.

OPEN agree with the findings that the Royal Elizabeth Yard is a recognised land use with existing industrial character in the landscape, yet is visually well contained due to the topography and surrounding landscape features. The following sections describe the landform and landscape setting through photos of the site and landscape context.

2.5 Landform

The site is located within the gently undulating area of land to the south west of Queensferry, see figure 7 opposite. There is a ridge of higher ground which separates South Queensferry from Kirkliston upon which the site is located on the northern side. Due to the landform, no views of the site are possible from the south of the ridge or from the east. Views back to the site are limited to localised views from the north and west.

The site falls from a high point of approximately 60m AOD on the south eastern side to the low point of approximately 50m AOD to the north west. Despite the 10m fall across the site area, the majority of the site is flat artificially levelled with steeper banks to the edges of the site. As such the topography presents no constraint to future development.

The SEPA flood map does not indicate any issues or constraints to development across the site area.

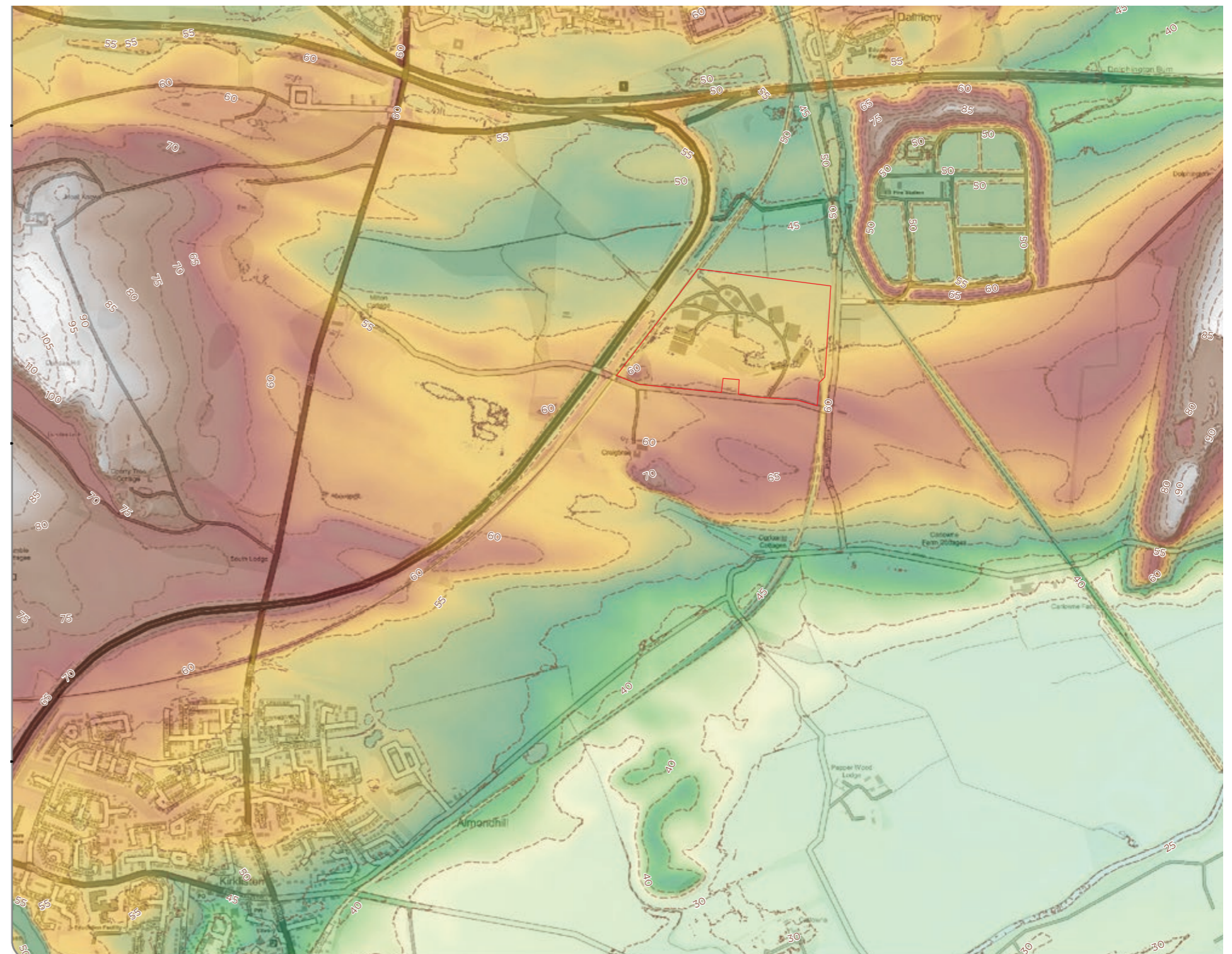


fig. 7: Landform

2.6 Visual survey

The following section has been included to describe the site context and demonstrate the minimal impact of the industrial site on the surrounding landscape. Photos to the site have been taken from the surrounding road network and Core Path to describe how it is located within the landscape.

A series of views of the site and within the surrounding landscape context have been selected to represent the visual characteristics of the site and surrounding area. Photographs and a brief description of each view are provided in the following section.

Views to the site are possible from the M90, only whilst travelling, and these are limited as the road is in an area of cutting as it passes the site area and generally enclosed by woodland.

- VP1 - Views to the site are limited due the surrounding woodland.
- VP2 - There are limited views to the site through the areas of woodland travelling east along the minor road.
- VP3 - Close to the site some of the larger buildings are visible but on the whole views to the site are limited.
- VP4 - The site is not visible from the south. Some of the block of woodland along the southern boundary are visible above the skyline.
- VP5 - Views of the site are possible from the A90 and Core Path 10 to the north where there is limited intervening woodland areas.
- VP6 - Views to the site are limited due the surrounding woodland. It is hard to distinguish the site location when travelling north or south on the B800.

Generally views into the site are restricted to close up views through the existing vegetation and as such other landscape features or where distant landscape elements are not often evident the roofline may be visible.

Retention and reinforcement of the existing landscape structure within the site will limit the degree of development potentially visible from farther afield such as from more elevated positions to the north and west where the roofline of the proposed development may potentially be viewed above the existing trees or through the canopy during winter months.

Overall however, and given the limited extent of changes to existing views, the introduction of any new development within the site area is not considered to substantially alter the visual amenity or character of the area already present within the context.

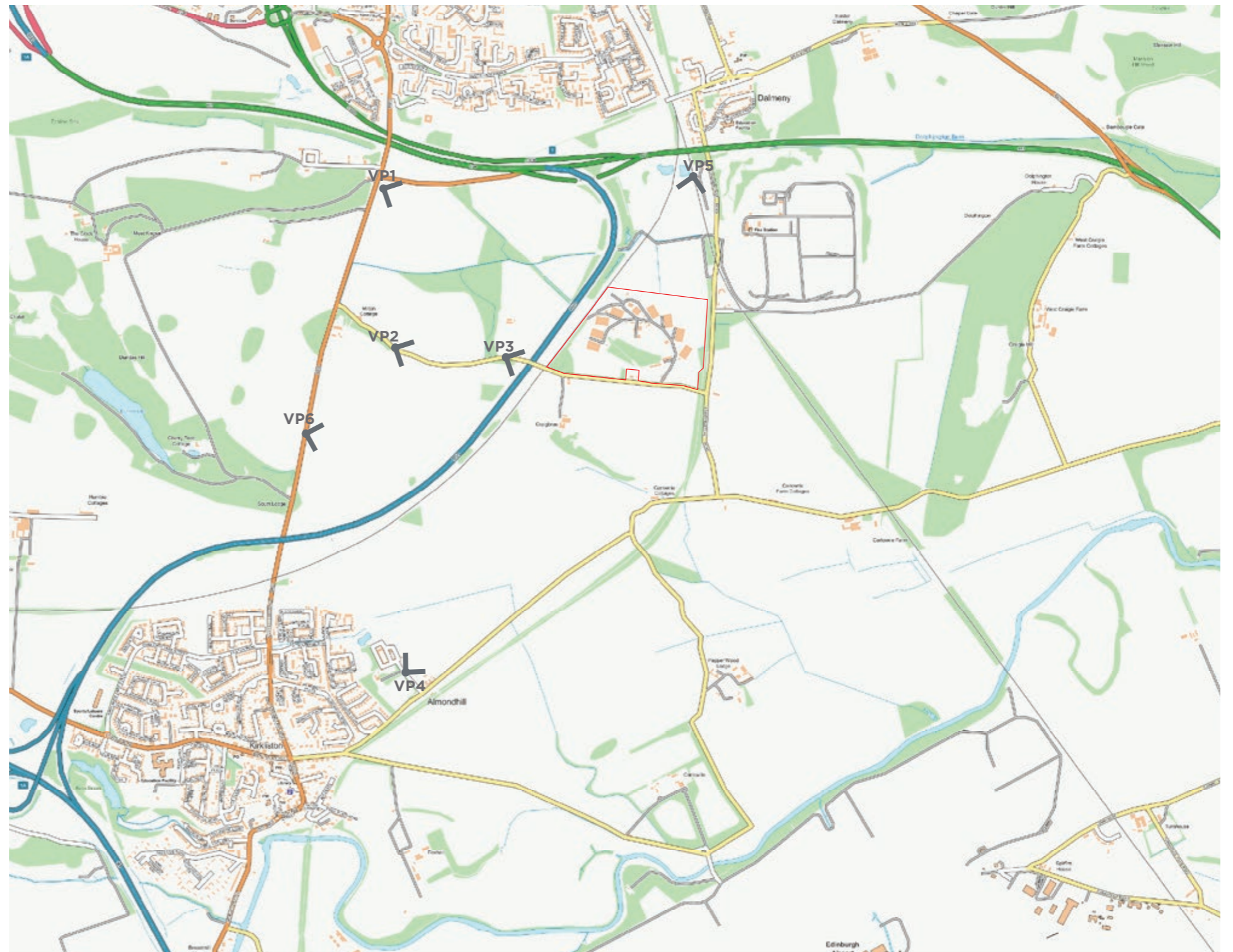


fig. 8: Landscape designations



fig. 9: Viewpoint 1 - View east to the site from the B800.



fig. 10: Viewpoint 2 - View east to the site from the minor access road.

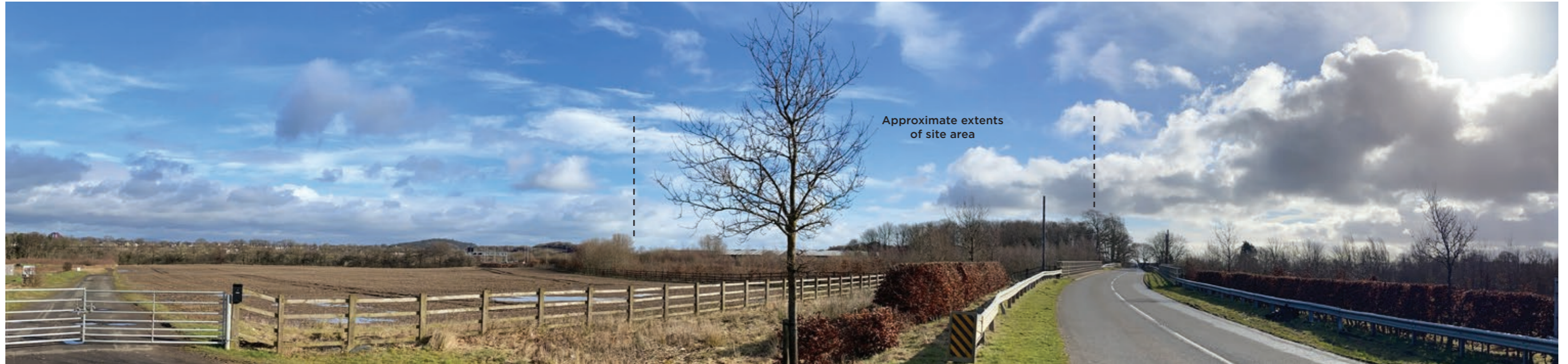


fig. 11: Viewpoint 3 - View east to the site from the B800.



fig. 12: Viewpoint 4 - View north east to the site area from Kirkliston.



fig. 13: Viewpoint 5 - View south to the site from the Core Path/NCR 1.



fig. 14: Viewpoint 6 - View north east to the site area from B800.

3. The site

3.1 The site

The existing industrial site is 19.7ha (48.7 acres), see figure 9 on the facing page.

The estate was originally developed in 1946 as a storage facility for the MOD servicing the naval establishments at Port Edgar and Rosyth. The unusual layout of the buildings within the site is derived from this previous use where railway sidings provided direct access to each of the buildings individually, see the historic plans opposite.

The site layout has changed little since its use as a MOD service facility with the railway sidings now removed the primary access to the original buildings is now from the road. This current layout does not allow for an efficient use of the land available and has resulted in large areas of under utilised and redundant spaces within the site.

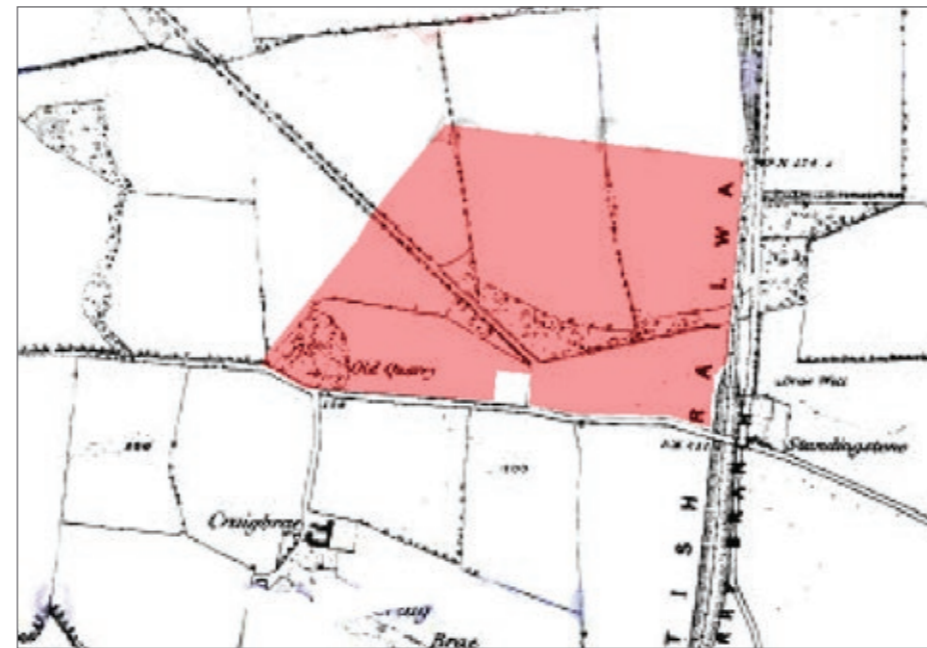
3.2 The site now

The site is now a busy trading estate. Situated in an attractive rural environment whilst being strategically well located, the yard provides an ideal distribution hub. It benefits from a comprehensive estate management policy including high levels of security including a manned gate house, security fencing and well maintained open grasslands. The estate comprises a range of warehouses from 1,000 sq ft to approximately 20,000 sq ft. The main internal service road has recently been upgraded and resurfaced.

A programme of refurbishments of the larger units has recently been completed with the units benefitting from new upgraded power supplies, re-roofing etc. These units are 7.5 metres high with excellent natural light from translucent roof panels servicing is via loading docks which benefit from end ramps.

In addition to the larger units, which are well utilised, there is a wide range of smaller buildings which are empty and require refurbishment.

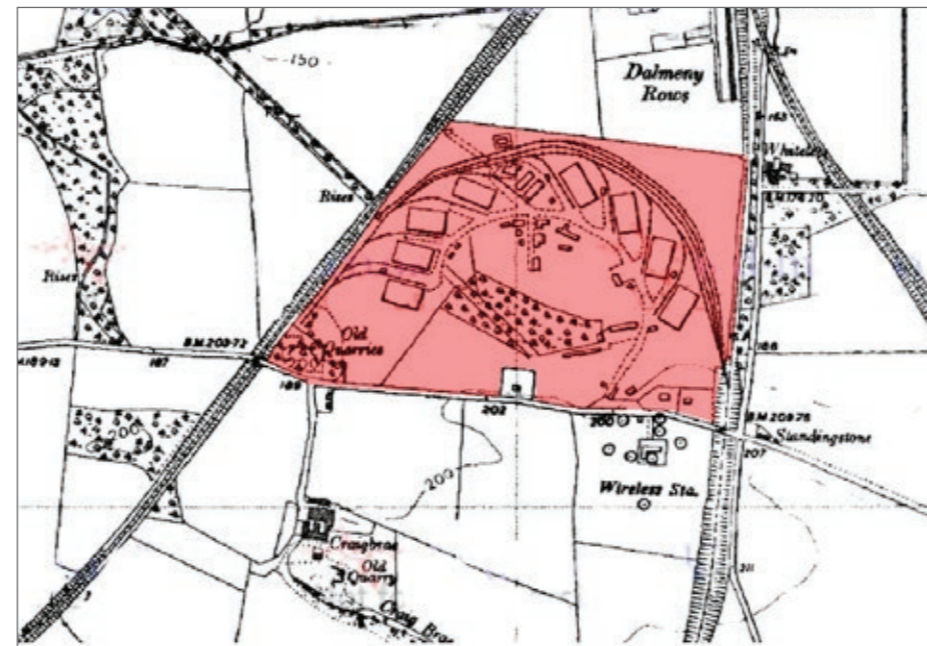
There is not a strong landscape structure within the site area. A block of mixed woodland, located within the centre of the site, dominates the site area and presents a constraint to more efficient use of the surrounding areas. There are other smaller areas of woodland on the periphery of the site which are unstructured and unconnected. These areas of woodland currently help contain the site visually and if reinforced could further restrict views to the site and better connect to surrounding areas of woodland, notably the LNCS to the east.



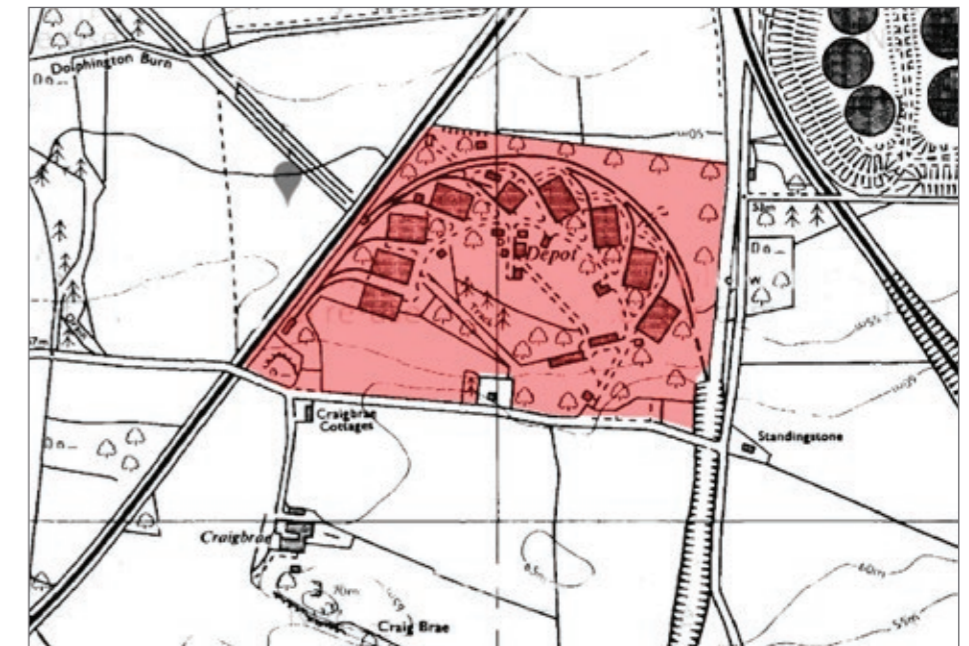
1856



1922



1951



1984

fig. 15: Historic plans of the site.



fig. 16: Site area.

3.3 Photos of the site

The following pages contain a series of photos and notes to help describe the site. The plan below provides a viewpoint location plan.



fig. 17: Viewpoint 7.



fig. 18: Viewpoint 8



fig. 19: Viewpoint 9



fig. 20: Viewpoint 10



fig. 21: Viewpoint 11



fig. 22: Viewpoint 12



fig. 23: Viewpoint 13



fig. 24: Viewpoint 14



fig. 25: Viewpoint 15



fig. 26: Viewpoint 16



fig. 27: Viewpoint 17



fig. 28: Viewpoint 18



fig. 29: Viewpoint 19



fig. 30: Viewpoint 20



fig. 31: Viewpoint 21



fig. 32: Viewpoint 22



fig. 33: Viewpoint 23



fig. 34: Viewpoint 24



fig. 35: Viewpoint 25



fig. 36: Viewpoint 26



fig. 37: Viewpoint 27



fig. 38: Viewpoint 28

3.4 Analysis of the site area

The key factor in wanting to promote the existing brownfield site for further business and industrial use is as a result of the limited and inefficient use of the existing site area. This is a result of the historical use as a MOD site, the rail access to the buildings, and layout meaning large parts of the site are not utilised for built development, storage or access.

The plan below highlights the extent of land utilised for development or access within the overall site area which amounts to only around 25%.

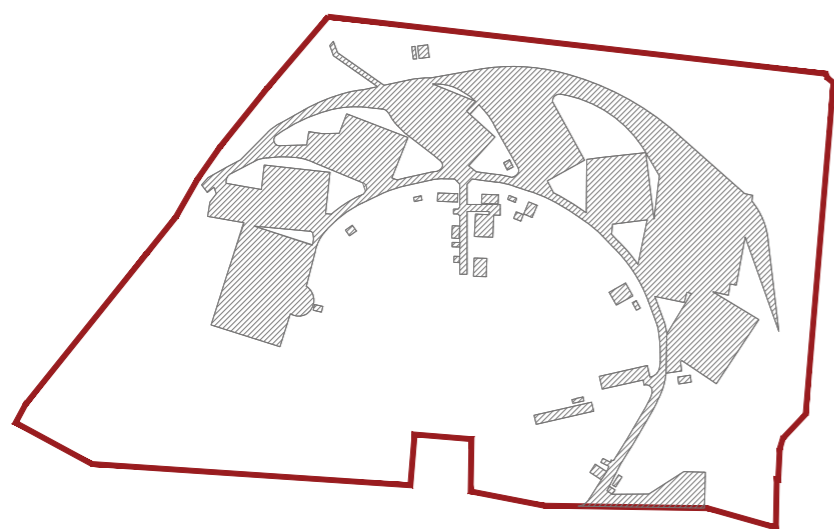


fig. 39: Existing development footprint

Total site area = 19.7ha

Current development footprint = 5.19ha

Percentage of the site currently utilised for development = circa 26%

Through the analysis of the site and landscape context OPEN believe the site does have capacity to accommodate further industrial or business development with the aim to make more efficient use of the land available within a robust landscape structure.

3.5 Opportunities and constraints

Following a review of the site area, see figure 40, the following constraints and opportunities have been identified. The features have shaped the proposals for the site which are presented in the following sections.

- Existing brownfield site with Industrial site/commercial character. The site whilst identified within the Greenbelt is a recognised industrial site. The desire is not to change the use of the site rather to make the most of the existing industrial site.
- Well contained with limited visibility from surrounding area. As described in section 2.6 of this document the site is well contained and is not visible from much of the surrounding area. This would allow for additional development within the site area without impacting the surrounding landscape setting.
- To help mitigate any visual impact from additional development, the site would benefit from additional landscape screening surrounding the site.
- The rural setting would mean any intensification of use would have limited impact upon surrounding properties.
- The site benefits from good road access.
- The site is easily accessible by pedestrians and cyclists from the Core Path /NCR however there is an opportunity to improve this with direct access to the site area.
- The site is generally flat and free from constraints which would allow for a more efficient use of the available land including further large industrial units.
- The north east corner of the site is covered by an HSE Exclusion zone (inner) from the oil storage depot. This does not stop the use of the land for development but does limits the type of development that can be located in this area.
- The large existing industrial units have recently been refurbished and are an asset to the site. The existing large units will be retained.
- There are a number of smaller buildings across the site area which are not currently being used and many of which are derelict. These have been identified to be removed to allow for more efficient use of the land available. Replacement smaller units may be considered.
- The parkland landscape to the south east provides an attractive entrance to the site and could accomodate some smaller office type units.

- As a result of the inefficient layout there are large areas of rough grassland which could be better utilised.
- The existing carpark area to the south east is not currently required and could be better accommodated within the site area. This land should be identified as part of the development site for smaller units.
- The landscape structure within the site area is poor and fragmented with mixed blocks of scrubby woodland around the edges of the site and a central block of mixed woodland. The woodland structure could be improved to allow for more efficient use of the site, provide a better setting and connect to existing areas of woodland which surround the site.

In considering the constraints and opportunities listed above a number of potential development areas have been identified within the current site layout. Utilising these areas will allow the available land to be used more efficiently.





Scale 1:2000 @ A3
 0m 20m 40m 60m 80m 100m

fig. 40: Site analysis

4. Development strategy

4.1 Development strategy

The development strategy for Royal Elizabeth Yard is to continue to use the site as an industrial site whilst making more efficient use of the land available for a modern industrial development.

To achieve this the following proposals are suggested;

- The existing large industrial units are to be retained. Access to these units will remain from the existing road.
- The smaller ancillary units across the site area will be demolished and removed to free up land for development.
- Re-model the central area of woodland which constrains development within site. The location and size of the woodland does not allow for efficient development of the site if it was to be retained in full. The area woodland removed from the centre of the site would be replaced by an equivalent area of new mixed woodland planting around the edges of the site.
- Create a robust landscape structure surrounding the site, connecting with existing woodland areas. The landscape surrounding the site will not only provide an attractive environment and shelter it will help mitigate any visual impact of additional development within the site.
- Locate an appropriate SUDs facility (to be designed) within the landscape area to the north west at the low point of the site.
- Retain and enhance the landscape to the south east as an arrival space for vehicles and pedestrians. This part of the site is the most prominent from the south (the land rises here to the highest point within the site) and minor access road and as such is not suitable for locating large industrial buildings. The space should be designed as a landscaped entrance space with new smaller office buildings, parking and path links.
- A direct path connection from the site to the Core Path 10/NCR should be provided.

Following the proposals above a number of new areas for development can be identified within the site area;

- Area 1 - There is an opportunity for this area to be better arranged to accommodate smaller ancillary buildings such as offices and form an attractive entrance to the site. The large areas of existing car parking, which are not required, should be fully incorporated within the site area and utilised for smaller office type buildings appropriate to the entrance location.
- Area 2 - Opportunity to make use of the land to the rear of the existing buildings (appropriate use within HSE inner zone). With additional screening planting to the northern boundary this current redundant space could be utilised for appropriate development.
- Area 3 - Removing the smaller buildings within the central space would allow this central space to be identified for development.
- Area 4 - With new landscape screening along the southern edge, reinforcing the existing hedge, this area to the south and rear of the existing buildings would become available for development.
- Areas 5 - With new landscape screening planting to the southern boundary there is capacity to accommodate additional development on the lower parts of this area.
- Area 6 - Through re-modelling the area of existing woodland, parts of this central area would become available for development. Further, by it would allow much more efficient use of the land available, maximising the capacity of the existing industrial site by allowing connections between areas 3, 4 and 5 with improved opportunities for access and circulation.



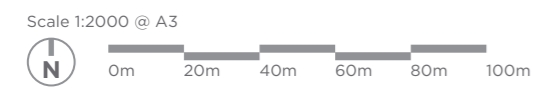
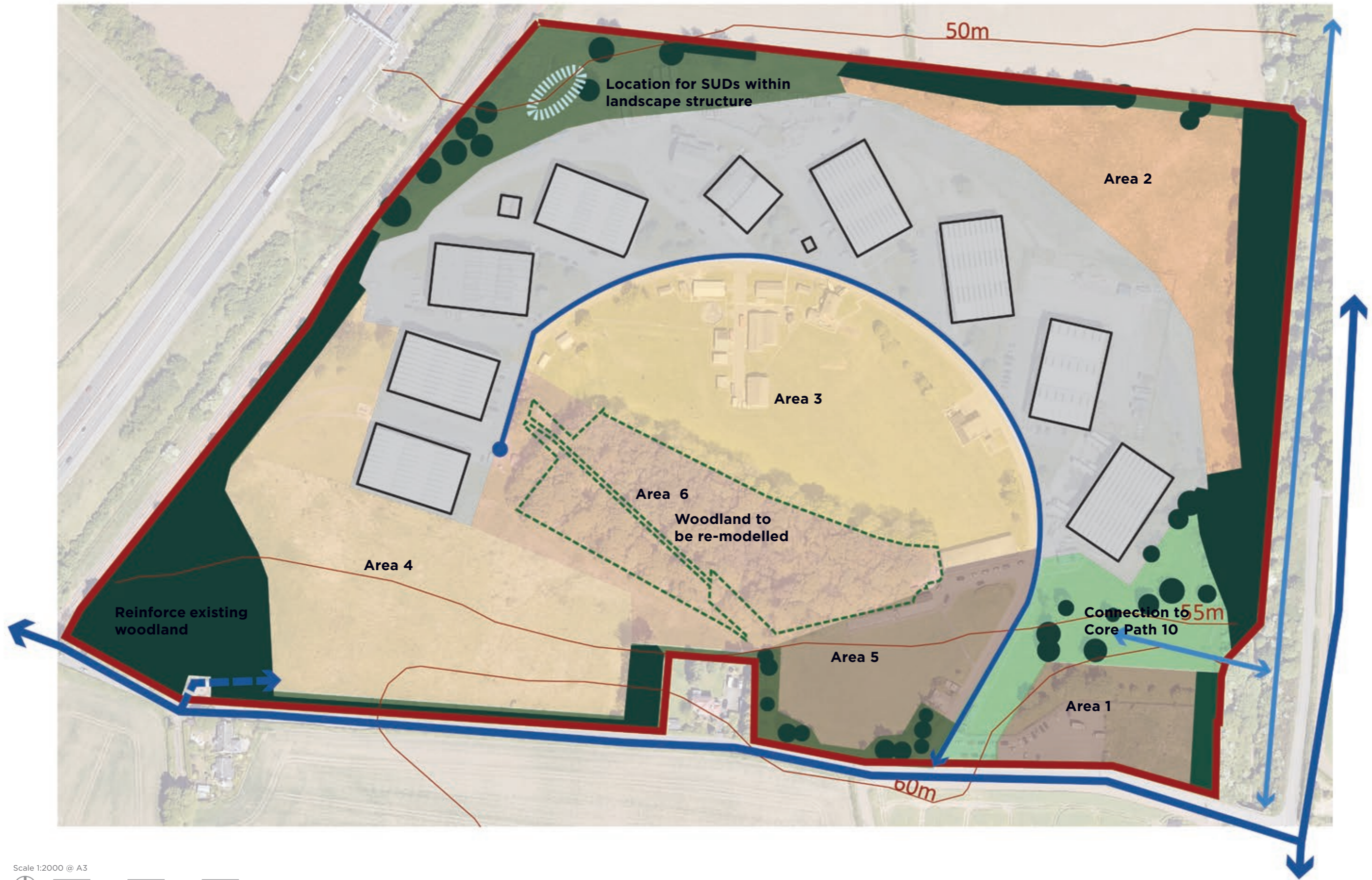


fig. 41: Development strategy

5. Development proposal

5.1 Development proposal

The plan opposite, figure 43, presents a simple framework layout as to how the site might be developed to achieve the principles set out in the strategy, allowing the most efficient use of the land available for Business and Industrial development. The Proposed development areas, identified on figure 42, will provide approximately an additional 10.50ha of development land within the existing site, representing more than 50% of the total site area in comparison to the current situation which only utilises around 25% of the land available..

Total site area = 19.7ha

Current development footprint (retained buildings) = 5.00ha

Proposed development footprint = 10.50ha

Percentage of the site proposed to be utilised for development = 78%

As outlined above by including the proposed development areas the existing industrial site can make much more efficient use of the land available.

The uses proposed for the development areas are not defined at this time, however, will be in keeping with the current commercial/industrial site and will fall within the Business and Industrial land use classification. The new uses will be subject to a detail Planning Application in due course.

The existing and proposed development areas will be accessed via the existing access road. The existing minor access to the west could also be used if required. New proposed road links will improve circulation within the site and make all parts of the site easily accessible.

New mixed landscape planting, is proposed around the majority of the site area to reinforce the areas of existing woodland. This will be in keeping with the surrounding landscape character, provide screening and help mitigate any visual impacts as a result of additional development within the site.

The south east corner of the site should be improved as an arrival point, replacing the car parks and redundant buildings with smaller office type buildings set within an attractive landscape. Through the removal of the existing buildings and rationalisation of the parking area there is opportunity to accommodate some smaller ancillary buildings such as offices in this location but not large commercial units.

5.2 Summary

The framework opposite has aimed to set out design principles which are appropriate to this point in the Planning process. This level of detail has been developed to ensure the opportunity this site presents as a modern Business and Industrial site is made clear. The existing brownfield site can provide additional Business and Industrial land through careful planning and efficient use of space with minimal impact on the surrounding area.

In summary OPEN believes that the site has the capacity to accommodate approximately an additional 10.50ha of land for Business and Industrial use within a brownfield site that is already recognised for similar uses. Given the extensive industrial offering on the site, it is recommended that Royal Elizabeth Yard should be identified in City Plan 2030 as a “Business and Industry Area” to recognise the site’s economic value.



fig. 42: Development proposals in context.

-  Existing Buildings to be retained
-  Existing Yard space to be retained
-  Proposed Development Areas
-  Existing Woodland
-  Proposed Landscape
-  Existing Landscape to be retained
-  Proposed SUDS
-  Existing Cycle Route
-  Proposed Cycle Route Connection
-  Existing Roads
-  Proposed Vehicle Access
-  Site Boundary

optimised environments ltd.

Edinburgh

Quartermile Two | 2 Lister Square | Edinburgh | EH3 9GL
t 0131 221 5920 | w optimisedenvironments.com

London

Unit 6 | 36-42 New Inn Yard | Shoreditch | London | EC2A 3EY
t 0203 984 4022

Manchester

13 Swan Street | Manchester | M4 5JJ
t 0161 696 7550

Optimised Environments Ltd. Registered in Scotland SC359690.
Registered address: Quartermile Two | 2 Lister Square | Edinburgh | EH3 9GL



Royal Elizabeth Yard, West Edinburgh Intensification of Industrial Land Uses - Transportation Overview

Introduction

ECS Transport Planning Limited (ECS) has been commissioned by Avison Young to undertake a transportation overview in support of an allocation for intensification of industrial land uses at the Royal Elizabeth Yard within the City of Edinburgh Council's (CEC) Choices for the City Plan 2030.

This report examines the key transportation considerations and access opportunities associated with all modes of travel for increased industrial development on the site. However, as the Yard is an established industrial site it is evident that the principle of development in this location has already been established in transportation terms.

Parameters for this study were established with reference to CEC's guidance for a typical industrial development, however, if this site should be successfully allocated within the City Plan and a subsequent planning application submitted, a detailed Transport Assessment (TA) will be produced to support the proposals and will be comprehensively scoped with CEC.

Existing Site & Proposed Development

The Royal Elizabeth Yard accommodates approximately 190,132sqft of well-maintained 1940's storage/business accommodation arranged over 37 units ranging from 250sqft to 19,000sqft on a site which extends to approximately 48.1 acres (19.9 hectares).

The site benefits from a high occupancy rate which is not surprising given it is strategically situated to the north west of Edinburgh city centre between South Queensferry / Dalmeny and Kirkliston, within a short distance of the A90 / Forth Bridges, M8 and M9 motorways. In addition, the site is a short distance from Edinburgh Airport which is attractive to various companies currently on site.

The site is currently accessed from a single access on to Milton Farm Road which connects the B800 in the west with Standingstone Road in the east. In addition to the Yard the road provides access to Battlezone Paintball and a small number of residential properties.

Photo's 1 & 2, below, present the site in its current form. *Photo 1* displays a view of the site access from Milton Farm Road looking east with *Photo 2* showing the Milton Farm Road site frontage looking north.

Photo 1: Existing Access from Milton Farm Road



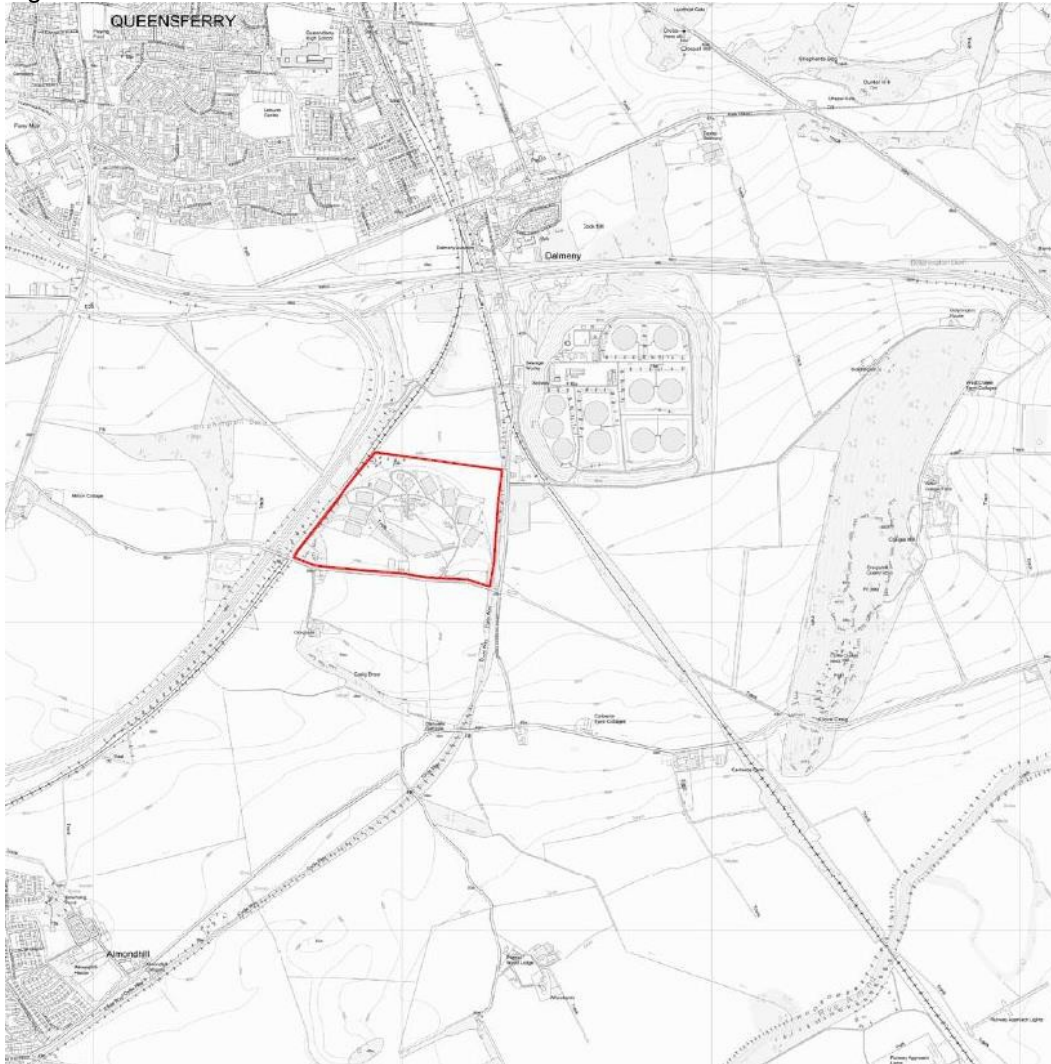
Photo 2: Milton Farm Road Site Frontage



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The location of the site, in a local context, is highlighted in red within *Figure 1* below.

Figure 1: Site Location



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The development strategy for Royal Elizabeth Yard is to continue to use the site as an industrial location whilst making more efficient use of the land available for a modern industrial development. The potential development areas can be described as follows:

- Land to the east of the Access – There is an opportunity for this area to be better arranged to accommodate smaller ancillary buildings such as offices and form an attractive entrance to the site. The large areas of existing car parking, which are not required, should be fully incorporated within the site area and utilised for smaller office type buildings appropriate to the entrance locations.
- Land on the North East Boundary - Opportunity to make use of the land to the rear of the existing buildings (appropriate use within HSE inner zone). With additional planting to the northern boundary this current redundant space could be utilised for appropriate development.

-
- Inner Core Area - Removing the smaller buildings within the central space would allow this area to be identified for development.
 - Land on the South West Boundary - With new landscape screening along the southern edge, reinforcing the existing hedge, this area to the south and rear of existing buildings would become available for development.
 - Land to Immediate West of the Access - With new landscape screening planting to the southern boundary there is capacity to accommodate additional development on the lower parts of this area.
 - Woodland within the Central Core – Through re-modelling the area of existing woodland, parts of this central area would become available for development. Further, it would allow much more efficient use of the land available, maximizing the capacity of the existing industrial site by allowing connections between areas 3, 4 and 5 with improved opportunities for access and circulation.

The existing access would be retained, however, as detailed above, a new connection to Core Path 10 would be proposed to provide an active travel route to the site.

Vehicle parking will also be provided in accordance with CEC's Edinburgh Design Guidance standards, comprising a mix of private and visitor provision adjacent to the units.

Development Accessibility

A series of policy documents / statements and guidance relating to transportation has been produced by local and national government bodies, including Scottish Planning Policy (SPP) and Planning Advice Note (PAN) 75. As most forms of transport are fundamental to modern life, whether moving people to school, work, shopping or recreation, the integration of transport and land use is a key element to support economic growth, as well as, social inclusion.

The following paragraphs examine the existing transport network and considers where improvements can be made to support the proposed development.

Pedestrian / Cycle Access

The primary pedestrian / cycle connection to the site is via Core Path 10 which is located on the eastern boundary of the site and is described as the Newbridge to Queensferry and Kirkliston link. The majority of the route is on old disused rail lines so gradients are gentle and the path is well surfaced.

The disused railway follows a sweeping curve from Newbridge via Kirkliston to Queensferry and is approximately 15km in length. It is predominantly level, but there is a ramped footbridge at Newbridge over the Newbridge Roundabout (M9). The route crosses the River Almond south of Kirkliston and continues north east to Carlowrie. North of the Queen Elizabeth Yard it follows a road before rejoining the old railway at Dalmeny, which it follows to Queensferry, where it links in with the Firth of Forth route (National Cycle Network 1), and across the Forth Road Bridge to Fife. A link in from Winchburgh joins at Kirkliston, passing along the B9080, south of the Humber Reservoir. There are also links into the NCN route on quiet roads and paths through Queensferry.

Adjacent to the site, the core path passes under Milton Farm Road at the south east corner of the site and continues north adjacent to the eastern site boundary. It is proposed to provide a direct connection from the site to the core path to ensure that both existing and proposed employees benefit from a predominantly traffic free cycle / footway connecting to the nearest settlements of Dalmeny, South Queensferry and Kirkliston.

In addition to the core path, the surrounding road network is lightly trafficked which makes it attractive to cyclists. Burnshot Road, to the south of the site, is a well-used cycle route as it provides a connection to NCN 1 to the east at Junction 1 of A90.

Route 1 is one of the National Cycle Network's star routes: a long distance challenge that connects Dover in the south of England to the Shetland Islands to the northeast of Scotland. This epic cycle journey will appeal to anyone looking to stretch their legs, test their limits and see the beautiful scenery of the British Isles.

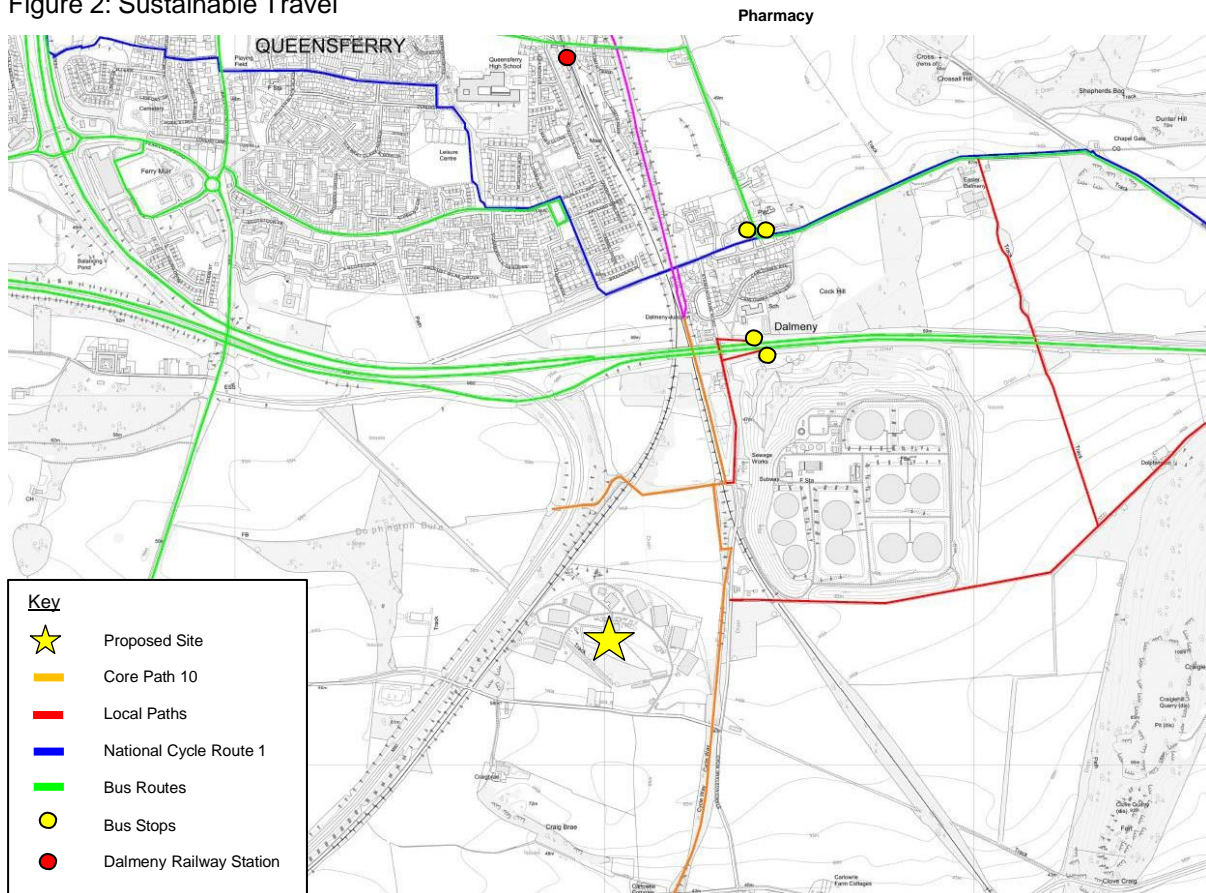
NCN 1 also connects to NCN 76 which is the Edinburgh to the Forth Road Bridge Route. This route takes you from the beautiful city of Edinburgh and its many architectural delights to South Queensferry and then across the impressive Forth Road Bridge. Cyclists can cross the bridge in perfect safety using the pedestrian and cycle paths which run on either side of the bridge and enjoy the magnificent views across the Firth of Forth.

An appropriate journey time for cycling is considered to be between 30 and 40 minutes and taking into account factors such as the time required for crossing roads and / or negotiating topography, an average speed of 10 to 20kph is considered possible equating to a cycle distance of 5km to 13km from the development site. This catchment will encompass many of the surrounding settlements including most of Edinburgh, Kirkliston, South Queensferry, Broxburn, Winchburgh, Rosyth, Inverkeithing and Dalgety Bay.

The proposed connection to Core Path 10 will ensure that pedestrians can connect to the nearby settlements enjoying the safety of a predominantly vehicle free route. Cyclists can also utilise Core Path 10 or the surrounding lightly trafficked road network to access the various National Cycle Networks which ensures that much of Edinburgh and settlements within Fife and West Lothian are readily accessible.

Figure 2 demonstrates that the site is accessible to a range of sustainable transport infrastructure and public transport services which ensures the site meets this aspect of relevant planning policy.

Figure 2: Sustainable Travel



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Public Transport Access

As detailed within *Table 1* below and presented on *Figure 2*, regular bus services operate on the A90, providing travel opportunities between Edinburgh and Dunfermline.

The nearest bus stops are located on the A90 some 600m to the north of the site boundary. The bus stops described are outwith the recommended walking distance of 400m stated within PAN75 to public transport services, however, it is widely recognised that these walking distances are often exceeded in rural areas with attractive provision. The services available provide a a 10 – 15 minute service throughout the day which will be attractive to staff and ensure the walk to the stops is not a deterrent.

The existing bus stops on the A90 benefit from shelters, timetable information and lay-bys. Access to these facilities from the site is available via Core Path 10 which connects directly to Standingstone Road which in tune has a direct connection to both the north and southbound stops.

Table 1, below, indicates there are currently 2 services operating in the area with Stagecoach being the main service provider.

Table 1: Existing Bus Services (A90)

Service	Operator	Route	Frequency
16	SD Travel	Livingston – Edinburgh – Western General Hospital	2 services per day
X55	Stagecoach	Edinburgh – Dunfermline or Perth	Varies (generally 10-15mins peak)

In addition to the bus services detailed above, there are also a regular bus services, Number 43, operated by Lothian Buses which serves the centre of Dalmeny. These stops are a further 400m from the A90 stops and provide an alternative service linking South Queensferry with Edinburgh on a 15 minute frequency.

Dalmeny Railway Station is the closest train station to the development site positioned approximately 1.5km to the north. Whilst located outwith the recommended walking distances to public transport facilities detailed within PAN75, there are numerous facilities available which would make multi-modal travel an attractive option. The station benefits from 10 cycle storage spaces and 130 car parking spaces and a drop off / pick up area, ensuring that multi-modal travel is a viable option.

Travel Plan Framework (Employment)

In line with Transport Assessment Guidance, Travel Plans Framework should first be introduced within the Transport Assessment which support the planning application. However, it is recognised that travel planning measures can play a key role in reducing private vehicle travel to employment sites. Given the nature and location of the site, it is envisaged that car sharing, cycle and walking clubs could significantly reduce car use and would have the additional benefit of being promoted to exiting staff on site.

The framework detailed below is not intended to represent a Travel Plan, but is intended to allow consideration of what may be required and is aimed primarily at staff travelling to the development site.

The Department of Transport (DoT) 'A guide on travel plans for developers' states:

“A travel plan is a strategy for managing all travel and transport within an organisation. It seeks to improve access to a site or development by sustainable models of transport. A travel plan contains both physical and behavioural measures to increase travel choices and reduce reliance on single-occupancy car travel”

The aim of travel plans, as outlined by Central Government Guidelines, is to address potential means of reducing reliance on staff single-occupancy car use and encouraging the use of alternative forms of travel.

A Travel Plan involves the development of a set of mechanisms, initiatives and targets that together enable organisations to reduce the impact of travel.”

Objectives

- There are a number of objectives, both at national and local level, that the implementation of the Travel Plan is intended to help fulfil:
- Influence travel behaviour;
- Generate fewer single-occupancy car trips than would otherwise be the case by encouraging a modal shift in travel to the site;
- Reduce the need for unnecessary journeys;
- Reduction in overall mileage;
- Help improve the health of staff; and,
- Accommodating those journeys that need to be made by car.

Targets

The objectives given above provide the framework for the Travel Plan measures. Where applicable, targets can be included to help achieve the objectives and there are two main types that are applicable. The most easily demonstrated is a commitment to deliver the package of measures set out in the plan. These measures include initiatives to promote increases in the use of walking, cycling, car-sharing and public transport use.

The second form of target is aspirational and related to proportional changes in the travel modes used to access the site. At this stage, there are no aspirational targets given in the plan as, in advance of the development opening, the modal split of staff for the office development is not known. Results of a staff travel survey (normally undertaken within 6 months of the development opening) would provide information on the prevailing travel choices of employees and a basis for the setting of aspirational targets in a later revision of the Travel Plan.

The Travel Plan will be implemented by the developer, who will work in conjunction with CEC and other interested parties in its continuing progression and be responsible for managing and implementing.

Initiatives

In order to ensure that the opportunities for modal shift can be realised there are a number of measures that will be considered and encouraged by the occupier(s) of the development:

- Provision of travel information - e.g. bus timetable information on staff notice boards;
- Measures to promote walking / cycling - washing and changing facilities, walking buddy schemes, bicycle users group, information on walk / cycle routes; and,
- Car sharing - Promote a staff car sharing scheme as a means of reducing single occupancy car trips.

Travel Plans are primarily focussed on staff and therefore the majority of measures proposed within a plan are intended to encourage staff to use more sustainable modes of transport when travelling to the development.

Monitoring & Review

An objective of the Travel Plan is that there will be an on-going improvement process including periodic monitoring, where necessary.

Vehicular Access

The Yard is situated between Kirkliston and South Queensferry and benefits from excellent access to Fife and the north via the A90/Forth Bridges, whilst west and central Scotland can be easily accessed via the M8 and M9 connections that lie in close proximity.

The access junction is of a high standard which would be expected given it has been designed to accommodate large vehicle types. Given the low vehicle numbers on Milton Farm Road the junction operates efficiently and safely and has significant reserve capacity to accommodate additional development on the site.

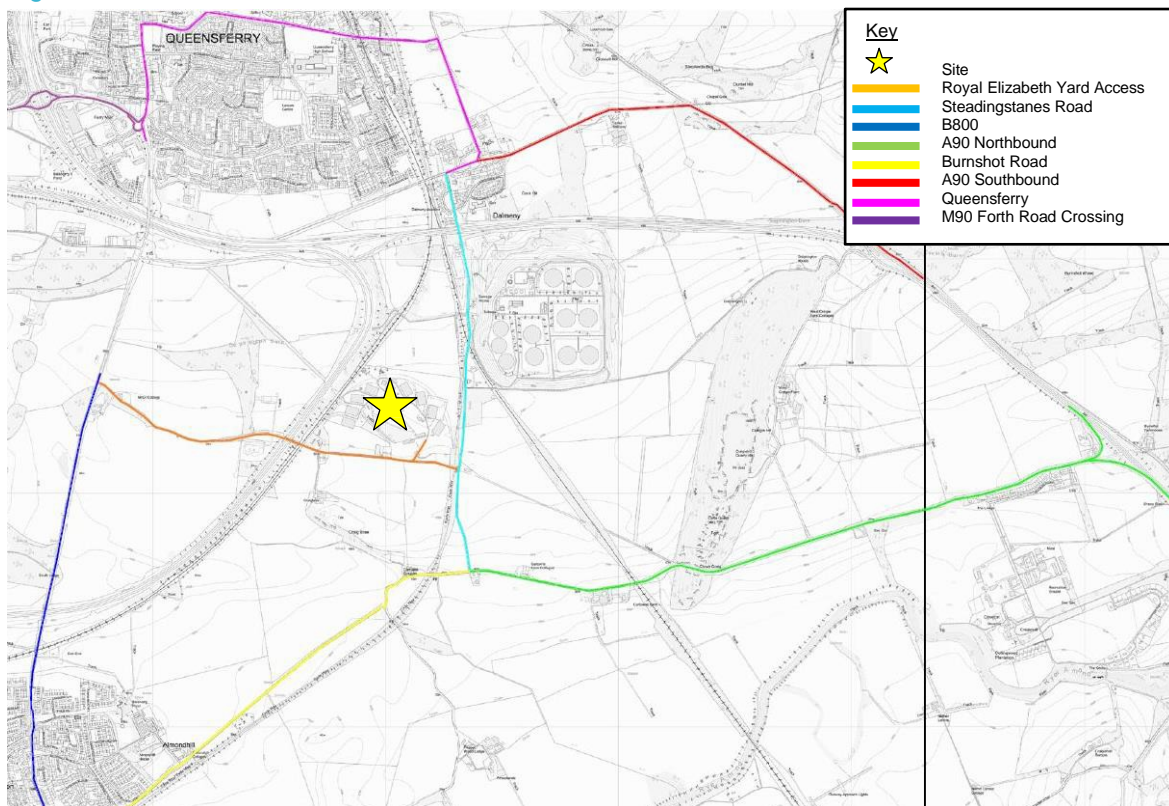
A review of Crashmap.co.uk has identified that there has been no recorded accidents in the immediate vicinity of the site in the last 5 years which reflects the low traffic volumes and demonstrates that the adjacent road network is safe for the existing and proposed industrial uses.

To access the yard there are essentially three primary routes which lead to the strategic road network, as follows:

- Yard Access Road / B800 to the west;
- Yard Access Road / Standingstone Road / Burnshot Road; and
- Yard Access Road / Standingstone Road / Main Street (Dalmeny).

Figure 4 provides a visual indication of the primary routes and proximity to the site.

Figure 3: Local Access Routes



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The following provides a summary of each of the routes detailed above.

Milton Farm Road / B800 to the West

Milton Farm Road, immediately to the west of the site access junction, is generally 5.5m wide with verges of varying width. Initially, the route, in the main, is sufficiently wide to allow two vehicles to pass although passing places are provided in some locations to the west.

Beyond the railway bridge, a section of modern standard wide carriageway has been introduced at the bridge over the M90. The improved section is approx. 300m in length before the carriageway narrows requiring passing places to allow large vehicles to pass.

The standard of route is fairly consistent prior to reaching the junction with the B800 which is of a high standard and could accommodate significant intensification of traffic. The B800 provides access to the M90 via the South Queensferry junction to the north and access to the M9 / M8 via Kirkliston and Newbridge to the south.

As the Burnshot Bridge has been closed for some time while a replacement structure is constructed, this route has become a primary route for deliveries and staff accessing the site. The recent intensification of use has demonstrated that the route is capable of accommodating increased traffic numbers even when the Burnshot Bridge reopens to traffic in the near future.

Milton Farm Road / Standingstane Road / Burnshot Road

Milton Farm Road to the east is also 5.5m wide with varying widths of verge. On approach to Standingstane Road the route crosses a structure which elevates the road above Core Path 10. The road at the bridge is 5.5m wide with 0.5m verges.

Milton Farm Road joins Standingstane Road via a simply priority junction which, when the Burnshot Road Bridge is available, is the primary route to the site. Standingstane Road to the south of the Yard is 6.5m wide with varying verge width which is considered to be a high standard link suitable for all vehicle types.

The Burnshot Road junction layout is of a modern standard and has been designed to accommodate large vehicle types with the introduction of large corner radii. ECS are aware that CEC are currently investigating the potential to reduce traffic speed restrictions in the wider area which would include Burnshot Road and surrounding links. The introduction of reduced speeds would clearly result in a significant road safety benefit which would be welcomed by local residents and businesses alike.

Burnshot Road provides a west – east connection between Kirkliston and the A90, respectively. Burnshot Road is used as an alternative route for traffic from the M8 / M9 / Newbridge area wishing to access the Forth Bridge and vice versa.

Milton Farm Road / Standingstane Road / Main Street (Dalmeny).

To the north, Standingstane Road varies in width but is suitable for two vehicles to pass safely. The road narrows as it passes under the railway bridge but can still accommodate two standard vehicles, however, due to the alignment, large vehicles would wait for other vehicles to pass.

To the north of the railway bridge, as the route enters the town it passes under the A90 and traffic calming is introduced to slow vehicles leaving the rural road network as residential properties front the route. From this point onwards the route is residential in nature with direct frontage access for dwellings and sensitive receptors such as a nursery adjacent to the road.

It is considered that this route would be attractive to staff living in the local area but would not be an appropriate haulage route for deliveries to the site.

The level of traffic generated by the proposed development site and subsequent impact on the surrounding road network is expected to be minimal, however, will be considered in detail and agreed

with CEC as part of the Transport Assessment process. During this stage, the proposed access strategy will be confirmed and operation of key offsite junctions investigated, if considered necessary.

Summary

A review of the proposed allocation site has been undertaken in terms of access by all modes of travel relating to industrial use. As the site is an established industrial site it is evident that the principle of development in this location has already been established in transportation terms.

The development strategy for Royal Elizabeth Yard is to continue to use the site as an industrial location whilst making more efficient use of the land available for a modern industrial development.

As part of the proposals it is proposed to provide a direct connection from the site to Core Path 10 to ensure that both existing and proposed employees benefit from a predominantly traffic free cycle / footway connecting to the nearest settlements of Dalmany, South Queensferry and Kirkliston. In addition, access to the nearby National Cycle Network routes will ensure that cyclists can access the site from many of the settlements in the wider area.

The nearest bus stops are located on the A90 some 600m to the north of the site boundary. The bus stops are outwith the recommended walking distance of 400m stated within PAN75 to public transport services, however, it is widely recognised that these walking distances are often exceeded in rural areas with attractive provision. The services available provide a 10 – 15 minute service throughout the day which will be attractive to staff and ensure the walk to the stops is not a deterrent.

In line with Transport Assessment Guidance, a travel plan will be introduced if the site is successfully allocated. It is recognised that travel planning measures can play a key role in reducing private vehicle travel to employment sites. Given the nature and location of the site, it is envisaged that car sharing, cycle and walking clubs could significantly reduce car use and would have the additional benefit of being promoted to exiting staff on site.

The Yard is situated between Kirkliston and South Queensferry and benefits from excellent road access to Fife and the north via the A90/Forth Bridges, whilst west and central Scotland can be easily accessed via the M8 and M9 connections that lie in close proximity.

The local road network has accommodated the traffic from Yard for many years with no recorded accidents or operational issues reported adjacent to the site. The level of traffic generated by the proposed development site and subsequent impact on the surrounding road network is expected to be minimal, however, will be considered in detail and agreed with CEC as part of the Transport Assessment process.

Conclusions

This report demonstrates that the principle of intensification of industrial use on the development site is viable from a transportation perspective. Connections to the adjacent Core Path network would assist with improving the active travel connections which would significantly improve the accessibility of the site. On this basis, there are no transportation reasons to preclude this site being allocated for industrial use within CEC's forthcoming Choices for the City plan 2030.

Assessment Area 1-North Leith									
Site No.	Site Name	Area (ha)	Density	Low	High	Current Use	Notes		
136	Coburn Street	1.02	M	102	178	Employment - Industrial			
137	Sandport Place	0.13	H	23	36	Employment - Industrial / Retail	assumes 50% industrial		
326	Ballic Street (B)	1.01	H	176	277	Employment - Industrial			
386	Commercial Street	0.08	H	14	22	Employment - Industrial / Retail	assumes 50% industrial		
387	North Leith Sands	1.77	H	309	496	Employment - Industrial			
388	Lower Street	1.35	M	135	236	Employment - Industrial			
389	Bath Road	3.49	M	349	645	Employment - Industrial			
390	Timberbush	0.12	H	21	33	Employment - Industrial			
392	Canon Place	3.87	H	677	1064	Employment - Industrial			
393	Salamander Place	0.49	H	85	134	Employment - Industrial			
TOTAL		13.53		1911	3111				
Assessment Area 2- Leith - Bonnington & Leith Walk									
Site No.	Site Name	Area (ha)	Density	Low	High	Current Use	Notes		
7	West Bowling Green Street	0.58	H	101	159	Employment - Industrial			
8	Newhaven Road (A)	0.52	H	91	143	Employment - Industrial			
8	Newhaven Road (B)	0.47	H	82	129	Employment - Industrial			
8	Newhaven Road (C)	1.33	M	133	232	Employment - Industrial			
9	Bonnington Road	0.67	M	67	117	Employment - Industrial			
10	Banqor Road (Swanfield Ind Estate)	2.05	M	205	358	Employment - Industrial			
134	South Fort Street (B)	2.93	M	293	512	Employment - Industrial			
138	Banqor Road (James Pringle)	0.46	M	46	81	Employment - Industrial / Retail	assumes 50% industrial		
158	Pitt Street	0.58	M	58	101	Employment - Industrial			
161	Leith Walk (depot)	1.08	H	189	297	Employment - Industrial			
230	Broughton Road	0.09	M	9	15	Employment - Industrial			
329	Stewartfield	1.45	M	145	253	Employment - Industrial			
382	Steads Place	0.7	M	65	114	Employment - Industrial / Retail	assumes 50% industrial		
384	Jane Street	4.18	M	418	731	Employment - Industrial			
385	Cranma Place	0.25	H	43	68	Employment - Industrial			
TOTAL		17.29		1945	3309				
Assessment Area 3-Beaverbank									
Site No.	Site Name	Area (ha)	Density	Low	High	Current Use	Notes		
146	Lodie Green Road	0.5	M	50	87	Employment - Industrial			
147	McDonald Road (A)	0.25	L	15	25	Employment - Industrial			
328	Broughton Road (Powderhall Waste Transfer)	2.16	S	218	378	Employment - Industrial			
332	Beaverhall Road	0.29	H	51	80	Employment - Industrial / Office	assumes 50% industrial		
404	East London Street	0.38	L	21	38	Employment			
TOTAL		3.58		417	608				
Assessment Area 4-Lochend - Meadowbank									
Site No.	Site Name	Area (ha)	Density	Low	High	Current Use	Notes		
17	St Clair Street	2.66	M	266	465	Employment - Industrial			
112	Albert Street	0.19	M	19	33	Employment - Industrial			
115	London Road (B)	0.4	H	70	110	Mixed Uses	assumes 50% industrial		
141	Albion Street	0.04	H	7	11	Employment - Industrial			
142	Jane Street	0.27	M	27	47	Employment - Industrial / Retail	assumes 50% industrial		
TOTAL		3.56		389	566				
Assessment Area 5-Seafield									
Site No.	Site Name	Area (ha)	Density	Low	High	Current Use	Notes		
227	Seafield Road	0.39	M	39	68	Employment - Industrial			
383	Seafield	11.44	S	130	500	Employment - Industrial / Retail	assumes 30% industrial		
TOTAL		11.83		349	568				
Assessment Area 6-Portobello									
Site No.	Site Name	Area (ha)	Density	Low	High	Current Use	Notes		
400	Sir Harry Lauder Road	1.23	M	123	215	Employment			
TOTAL		1.23		123	215				
Assessment Area 7-Niddrie - Bingham - Willowbrae									
Site No.	Site Name	Area (ha)	Density	Low	High	Current Use	Notes		
16	Duddingston Park South (Duddingston Yards)	0.46	L	27	46	Employment - Industrial			
75	Duddingston Park South	0.11	M	11	19	Mixed Uses	assumes 50% industrial		
78	Pfeifer Bank	0.93	M	134	134	Employment - Industrial			
378.1	Russell Road	1.28	M	128	224	Employment - Industrial			
TOTAL		2.78		300	423				
Assessment Area 8-Inch Nursery - Cameron Toll - Prestonfield									
Site No.	Site Name	Area (ha)	Density	Low	High	Current Use	Notes		
372	Inch Nursery	4.65	M	465	813	Employment - Industrial			
TOTAL		4.65		465	813				
Assessment Area 9-Southside									
Site No.	Site Name	Area (ha)	Density	Low	High	Current Use	Notes		
124	Batciffe Terrace	0.66	M	66	111	Employment - Industrial			
371	Cowan's Close	0.19	M	19	32	Mixed Uses	assumes 50% industrial		
TOTAL		0.85		85	147				
Assessment Area 10-Liberton Hospital									
Site No.	Site Name	Area (ha)	Density	Low	High	Current Use	Notes		
None									
Assessment Area 11-Aslley Ainslie									
Site No.	Site Name	Area (ha)	Density	Low	High	Current Use	Notes		
None									
Assessment Area 12-Redford Barracks									
Site No.	Site Name	Area (ha)	Density	Low	High	Current Use	Notes		
None									
Assessment Area 13-Wester Hailes									
Site No.	Site Name	Area (ha)	Density	Low	High	Current Use	Notes		
37	Murrayburn Road (A)	3.06	M	306	535	Employment - Industrial			
38	Burnbank Drive	0.8	M	80	140	Employment - Industrial			
192	Indie Green Road (A)	0.13	M	13	13	Retail / Mixed Uses	assumes 25% industrial		
195	Longstone Road	0.47	L	28	47	Employment - Industrial			
361	Murrayburn Road (B)	1.6	M	160	280	Employment - Industrial			
TOTAL		6.06		582	1015				
Assessment Area 14-Lanark Road									
Site No.	Site Name	Area (ha)	Density	Low	High	Current Use	Notes		
381	Lanark Road (B)	0.16	M	16	28	Employment			
TOTAL		0.16		16	28				
Assessment Area 15-George - Dairy									
Site No.	Site Name	Area (ha)	Density	Low	High	Current Use	Notes		
43	Stonhouse Road	3.57	L	214	357	Employment - Industrial			
61	Stevenson Road	2.04	M	204	357	Employment - Industrial			
88	Temple Park Crescent	0.17	H	29	46	Employment - Industrial			
89	Watson Crescent Lane	0.09	M	9	15	Employment - Industrial			
99	Murleston Lane	0.21	M	21	36	Employment - mixed uses	assumes 50% industrial		
100	Dundee Terrace - LDP	0.09	M	9	16	Employment - Industrial / Retail	assumes 50% industrial		
290	Balresen	1.01	M	101	176	Employment - Industrial			
363	West George Park	0.79	M	79	138	Employment - Industrial			
378.2	Russell Road	1.25	M	125	218	Employment - Industrial			
401	George Road (Caledonian Packaging)	0.93	H	187	294	Employment			
TOTAL		10.15		978	1652				
Assessment Area 16-Fountainbridge									
Site No.	Site Name	Area (ha)	Density	Low	High	Current Use	Notes		
None									
Assessment Area 17-New Town									
Site No.	Site Name	Area (ha)	Density	Low	High	Current Use	Notes		
153	Evea Place	0.21	M	21	36	Employment - mixed uses	assumes 50% industrial		
399	Broughton Market	0.23	M	23	40	Employment			
TOTAL		0.4		44	76				
Assessment Area 18-Orchard Brae - Craigleith									
Site No.	Site Name	Area (ha)	Density	Low	High	Current Use	Notes		
95	Crows Road South	1.26	M	76	134	Employment - mixed uses	assumes 20% industrial		
TOTAL		1.26		76	134				
Assessment Area 19-Pilton									
Site No.	Site Name	Area (ha)	Density	Low	High	Current Use	Notes		
331	West Pilton Place	0.06	L	3	6	Employment - Industrial			
TOTAL		0.06		3	6				
Assessment Area 20-Silverlea									
Site No.	Site Name	Area (ha)	Density	Low	High	Current Use	Notes		
None									
Assessment Area 21-Constophine									
Site No.	Site Name	Area (ha)	Density	Low	High	Current Use	Notes		
342	St John's Road (A)	0.09	H	15	24	Employment - Industrial			
391	St John's Road (B)	0.82	M	82	143	Employment - Industrial			
TOTAL		0.91		97	167				
Assessment Area 22-West Edinburgh									
Site No.	Site Name	Area (ha)	Density	Low	High	Current Use	Notes		
281	Lumhouse Road (SAICA)	6.27	M	627	1097	Employment - Industrial			
282	Lumhouse Road	3.25	M	325	568	Employment - Industrial			
TOTAL		9.52		952	1665				
Assessment Area 23-Government Buildings									
Site No.	Site Name	Area (ha)	Density	Low	High	Current Use	Notes		
None									
Total		87.8509		8749	14601				



Royal Elizabeth Yard – Planning Representation

Bonded Warehousing and Distillery Industry Hub

1. Introduction

At the time of purchase Lewis Sutton were asked for their views on likely demand drivers for new and existing space at Royal Elizabeth Yards by the owners.

2. Demand

We identified the burgeoning specialist and artisan distillery industry given the rise in small distilleries, many producing gin at present until their whisky reaches maturation, who require bonded warehouse space for storage of premium whisky as well as complementary operators such as coopers etc.

This was borne out by two lettings, immediately post-purchase, of an existing building for a 20,000 sq ft bond to the Holyrood Distillery and another to a cooperage business.

Further discussions with distillers, bottlers and connected parties to the industry have indicated there is wider demand across the industry. This is primarily due to:-

- A rise in artisan/specialist distillers requiring bond space
- Large Plc operators wishing to mature increased quantities of their own product to satisfy demand and therefore requiring them to free-up their own bond space occupied by smaller producers whisky
- A number of medium-sized family/private-owned distillers requiring space, with one in particular wishing to mature their premium range lowland-distilled brands in this location
- A requirement from whisky brokers and collectors to co-locate stocks into a managed bonded warehouse complex

3.0 Requirements

Our discussions with the various operators to date have outlined demand for:-

- Bonded warehouse space of 20,000 sq ft units which are capable of being fitted with either a racked or palletised storage system depending upon
- These bonds can either be split into 2 no. 10,000 sq ft bonded warehouses or let as a single 20,000 sq ft unit



- The requirement for a filling and disgorging plant so that whisky can be tankered to the site as opposed to transported in casks which is less economic and leaves a larger carbon footprint
- Potential for a bottling plant and cooperage uses as well as for contract bondsmen to undertake testing and finishing etc
- The possibility, at a later stage, of a “Centre of Excellence” for the whisky industry within the greater Edinburgh area to include educational and tourist related uses.

4.0 Demand drivers

Our discussions with the distillery industry have revealed strong demand for the site for the uses outlined above due to:-

Location

- Close proximity to Edinburgh yet in a secluded and secure location
- Good connectivity to the local road network for heavy vehicles but with low usage due to relatively small number of vehicles movements give nature of product stored
- Strategic location in terms of access to the Edinburgh bypass, A1, M8 and Queensferry Crossing/M90 and A9.

Security

The site has excellent security characteristics given it was a former MOD NAAFI supply depot.

COMAH Zone

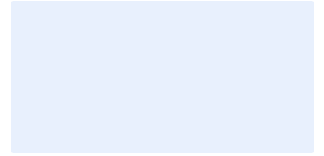
The site sits within an existing COMAH zone therefore is ideally suited to the storage of whisky during the maturation process.

HMRC Bond Legislation

Given the self-contained nature of the site, and potential for internal divisibility, the property lends itself well to the development and construction of bonded warehousing that is readily compliant with HMRC regulations.

Many other industrial or warehousing sites in and around Edinburgh and the Central belt in general do not have these characteristics.





Representations to Choices for CityPlan 2030 In respect of Royal Elizabeth Yard

On behalf of Cinnamon Sedge LLP

April 2020



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Appendix 1 - Royal Elizabeth Yard – Development Strategy prepared by OPEN

Appendix 2 - Transport Overview prepared by ECS Transport Consultant Ltd

Appendix 3 - Schedule of Industrial Sites identified for housing

Appendix 4 - Bonded Warehousing and Distillery Industry Hub at REY – advice by Lewis Sutton Property Consultants

Prepared By: Caroline Nutsford

Status: Final

Date: April 2020

For and on behalf of Avison Young (UK) Limited

1. Introduction

- 1.1 These representations are submitted by Avison Young on behalf of our client Cinnamon Sedge LLP and relate to land within our client's ownership at Royal Elizabeth Yard (REY), near Dalmeny, Edinburgh.
- 1.2 Royal Elizabeth Yard comprises a multi-let industrial site. The site is strategically situated to the north west of Edinburgh, lying between South Queensferry/Dalmeny and Kirkliston and has good access to the A90/Forth Bridges, M8 and M9 motorways.
- 1.3 Royal Elizabeth Yard extends to approximately 19.7 hectares and comprises approximately 190,132 sq ft of industrial accommodation. This is arranged over 37 units comprising 8 large industrial warehouse sheds and a number of smaller buildings. Unit sizes range from 250 sqft to 19,000 sq ft.
- 1.4 A site location plan and aerial image of the site is provided below.





1.5 The site is currently well-let with existing tenants including:

- Underbelly;
- Catalyst;
- William Kirkpatrick;
- Powder Design;
- Collinson Ceramics;
- Form Access;
- Edinburgh Bicycle Co-operate
- Thompsons Tippers
- Continental Wine and Food
- National Galleries Scotland
- Mr J Peterson
- ECE Associates.

1.6 Royal Elizabeth Yard was originally developed in the 1940s as a depot to supply food and beverages to the Royal Navy at Rosyth.

1.7 Further details on the site and its surrounding context is set out in Appendix 1.

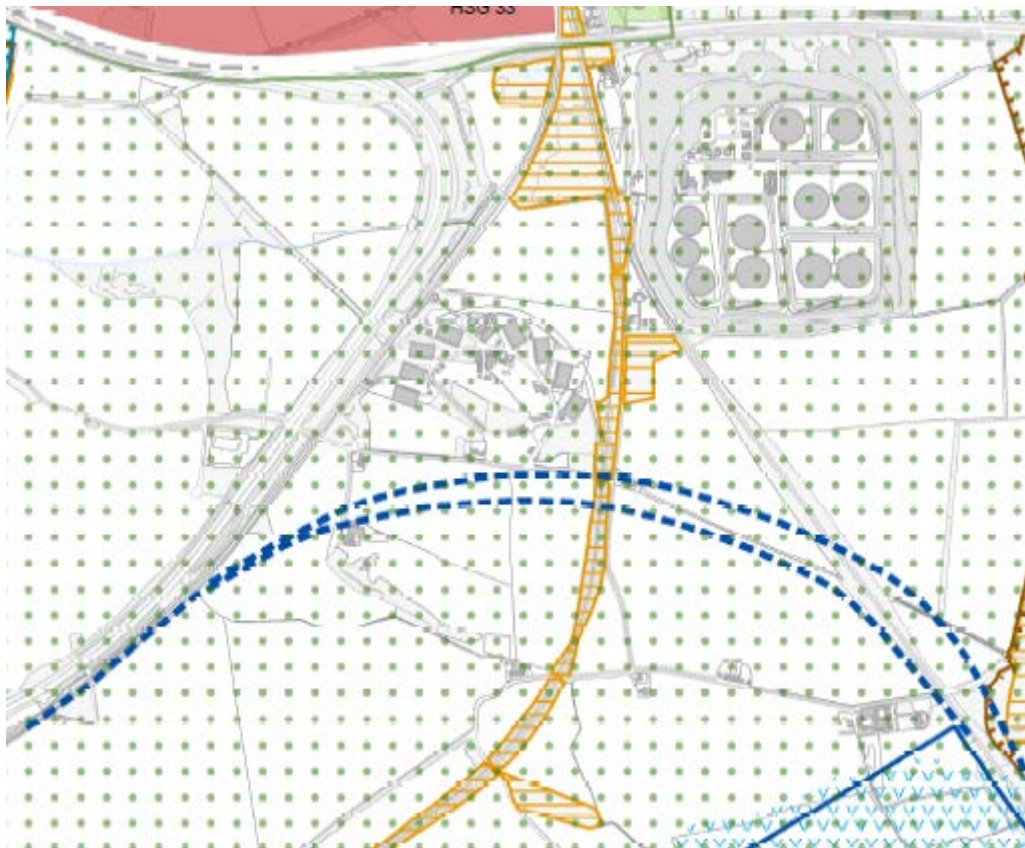
Scope of Representations

- 1.8 These representations to Choices for City Plan 2030 relate to Choice 16 – Delivering Office, Business and Industrial Floorspace. As set out in detail in the subsequent section, our representations seek the following:
- The allocation of Royal Elizabeth Yard as an existing business and industrial site in recognition of its existing economic value;
 - As part of a green belt review, consideration to the removal of Royal Elizabeth Yard from the green belt;
 - Given the potential of the site to accommodate further industrial development, identification of Royal Elizabeth Yard for new modern industrial and ancillary development to help provide necessary industrial floorspace.
- 1.9 These representations are supported by a Development Strategy which has been prepared by OPEN (Appendix 1) and a Transport Statement which has been prepared by ECS (Appendix 2).

2. Representations

Allocation as an existing Business and Industry site

- 2.1 As outlined in section 1, Royal Elizabeth Yard is a well-established business/industrial park. It extends to 19.7ha, provides approximately 190,000 sq ft of industrial floorspace and offers accommodation for a wide range of occupiers. The site is well-let and therefore plays an important role in providing jobs, investment opportunities and helps to meet the city's industrial needs.
- 2.2 In the current adopted Edinburgh Local Development Plan 2016, Royal Elizabeth Yard is not identified as an existing business and industry area and is a brownfield site which lies within the green belt. 'Brownfield land' is defined in the glossary of the Edinburgh LDP as "land which has been previously developed", as indeed it is in Scottish Planning Policy also. In this particular case, it is therefore beyond any doubt that the site in question is brownfield. As we come onto further below, development should always be directed to brownfield land in the first instance. An extract of the adopted Edinburgh Local Development Plan 2016 proposals map is provided below.



- 2.3 Given the extensive industrial offering on the site, as outlined in section 1, it is recommended that Royal Elizabeth Yard should be identified in City Plan 2030 as a "Business and Industry Area" to recognise the site's economic value. This policy designation aims to retain a range of employment sites across the city where new and existing business can operate, expand or relocate.

Removal from the Green Belt

- 2.4 Royal Elizabeth Yard is a brownfield site in the green belt. The green belt is defined in the LDP glossary as *“Land defined in the adopted local plans or local development plans which protects and enhances the landscape setting and identity of Edinburgh and protects and gives access to open space around the city and smaller settlements”*. As a brownfield site, it stands to reason that Royal Elizabeth Yard is incompatible with the reasons for including land within the green belt. The Choices document advises that the proposed City Plan 2030 will make green belt amendments as technical changes. As a part of its green belt review and in light of the observations above, the Council should also consider the removal of REY from the green belt. Notably, in the early stages of preparing the (now adopted) Edinburgh City Local Plan, the site was included as one of five sites suggested for removal from the green belt.
- 2.5 Paragraph 51 of Scottish Planning Policy relates to green belts and states:
- “The spatial form of the green belt should be appropriate to the location. It may encircle a settlement or take the shape of a buffer, corridor, strip or wedge. Local Development Plans should show the detailed boundary of any green belt, giving consideration to”*: (inter alia)
- *“excluding existing settlements and major educational and research uses, major businesses and industrial operations, airports and Ministry of Defence establishments”*.
- 2.6 As a large scale industrial operation, the removal of Royal Elizabeth Yard from the green belt, would accord with the above. Furthermore, the removal of Royal Elizabeth Yard from the green belt would not impact on the overall objectives of green belts which are set out in SPP as: to direct development to the most appropriate locations and supporting regeneration; protecting and enhancing the character, landscape setting and identity of the settlement; and protecting and providing access to open space.
- 2.7 Alternatively, if CEC’s green belt review does not identify the site for removal from the green belt, it is considered that the site should be identified as an existing business and industry area “washed over” by the green belt. This would not be dissimilar to examples in the current local development plan e.g. RBS at Gogarburn, which is identified as a special economic area in the green belt.

Proposals for new modern business and industry sites

- 2.8 A key part of City Plan 2030 is to ensure that the city has enough business and industrial space. Under choice 16A, the Council is looking to identify proposals for new modern business and industrial sites to provide necessary floorspace to meet the city’s business and industry needs. Presently, Choices identifies sites for new business and industrial floorspace at Leith Docks; Newbridge; Newcraighall Industrial Estate and Crosswinds.
- 2.9 The Royal Elizabeth Yard site has the potential to accommodate further industrial development and accordingly should be identified in City Plan 2030 as a proposed site for new modern industrial uses. SPP advises that *“Planning should direct the right development to the right place”*. This includes: *“considering the re-use or redevelopment of brownfield land before new development takes place on greenfield sites”*

(paragraph 40). As a brownfield site, with already well-established industrial units, Royal Elizabeth Yard meets this requirement and is considered the 'right place' for further industrial development.

2.10 Further justification for this is set out below.

Potential of site to accommodate further development

2.11 The principle of industrial development is well established at Royal Elizabeth Yard with the site being a successful business/industrial park. The existing units on-site are currently well let and it is clear that the site therefore functions well in the location.

2.12 The site is currently inefficient with large areas of underutilised and redundant space. Indeed, at present, only around 25% of the site is currently utilised for development. The brownfield site clearly has the capacity to accommodate further development.

2.13 As part of a Development Strategy (see appendix 1), OPEN has assessed the ability of the site to accommodate further development in landscape and visual terms. This has considered the site's landscape character, its landform and, through a visual survey, assessed the impact new development would have on the landscape. Significantly, while the site lies in an area which is rural in character, OPEN's assessment demonstrates that the introduction of new development within the site area would not substantially alter the visual amenity or character of the area. Views into the site are limited predominantly to close up views, and new development would sit within the context of the existing development on the site. Retention and reinforcement of existing landscaping as part of new proposals would further limit the degree of development which would be visible.

2.14 In 2019, CEC undertook a landscape and visual assessment across the city which included the Royal Elizabeth Yard site. While this was undertaken in the context of assessing the potential for residential development, its findings support OPEN's recent assessment that the site is able to accommodate further development. CEC's assessment concluded that the site is reasonably well screened due to its low lying nature and woodland and that development would not affect the strong rural character and high scenic qualities of the landscape and could be visually discrete.

2.15 In terms of deliverability, OPEN's assessment has also identified that the site is relatively flat and free from constraints. SEPA's floodrisk map demonstrates that there are no constraints on the site in terms of floodrisk.

2.16 The site is situated in close proximity to the Dalmeny Oil Storage Depot, which lies to the north west of the site and falls within the major hazard consultation zones defined by the Health and Safety Executive, as shown in the plan overleaf. When a site is located within the consultation zone of a major hazard site, the HSE can either 'Advise Against' (AA) or 'Don't Advise Against' (DAA) granting planning permission to a proposed development, based on the following criteria;

- The 'consultation zone' that the proposed development lies in; and
- The 'sensitivity level' of the development type.

2.17 There are four sensitivity levels which allow progressively more severe restrictions as the sensitivity of the proposed development increases. Industrial development falls within sensitivity level 1 - People at work,

2.20 ECS Transport Planning Ltd has undertaken a transport review of the site to assess its potential, in transportation terms, to accommodate further development. Their full report is enclosed at appendix 2. In summary, they have identified the following:

- As an established industrial site, the principle of development in this location is already established in transport terms.
- The site benefits from excellent road access to Fife and the North via the A90/Forth Bridge, whilst West and Central Scotland can be easily accessed by the M8 and M9 connections that lie in close proximity.
- The local road network accommodates existing traffic at Royal Elizabeth Yard with no recorded accident or operational issues.
- Access into the site has significant reserve capacity to accommodate additional development on the site.
- The site is and/or can be made accessible by a range of sustainable transport infrastructure and public transport services.
- Traffic generated by further industrial uses and subsequent impact on surrounding road network is expected to be minimal (and would be fully tested as part of any detailed proposals).
- The principle of intensification of industrial uses is viable from a transportation perspective.

Industrial need

2.21 Choices identifies that *"City Plan 2030 will need to ensure that we have enough business and industrial floorspace to meet the City's demand..."*

2.22 The Council's Commercial Needs Study 2018 identifies the following:

- There is a presumption in favour of retaining industrial uses at strategic locations
- The majority of Edinburgh's industrial stock is now at least 40 years old and is beginning to exhibit obsolescence
- Market demand is steady; demand is increasingly towards strategic locations with good transportation links on the edge of urban Edinburgh
- Some ageing inner urban industrial premises are being redeveloped for alternative uses
- There is a need to replace lost industrial floorspace and modernise the stock
- There is a 12 year requirement for 81,000sq.m of new build industrial premises requiring 27 hectares of land.

2.23 At a strategic level, the findings and recommendations of the Commercial Needs Study support the consolidation and enhancement of Royal Elizabeth Yard as a strategic location for economic / industrial development and support its intensification as a proposed site for new modern industrial use to meet the City's industrial needs.

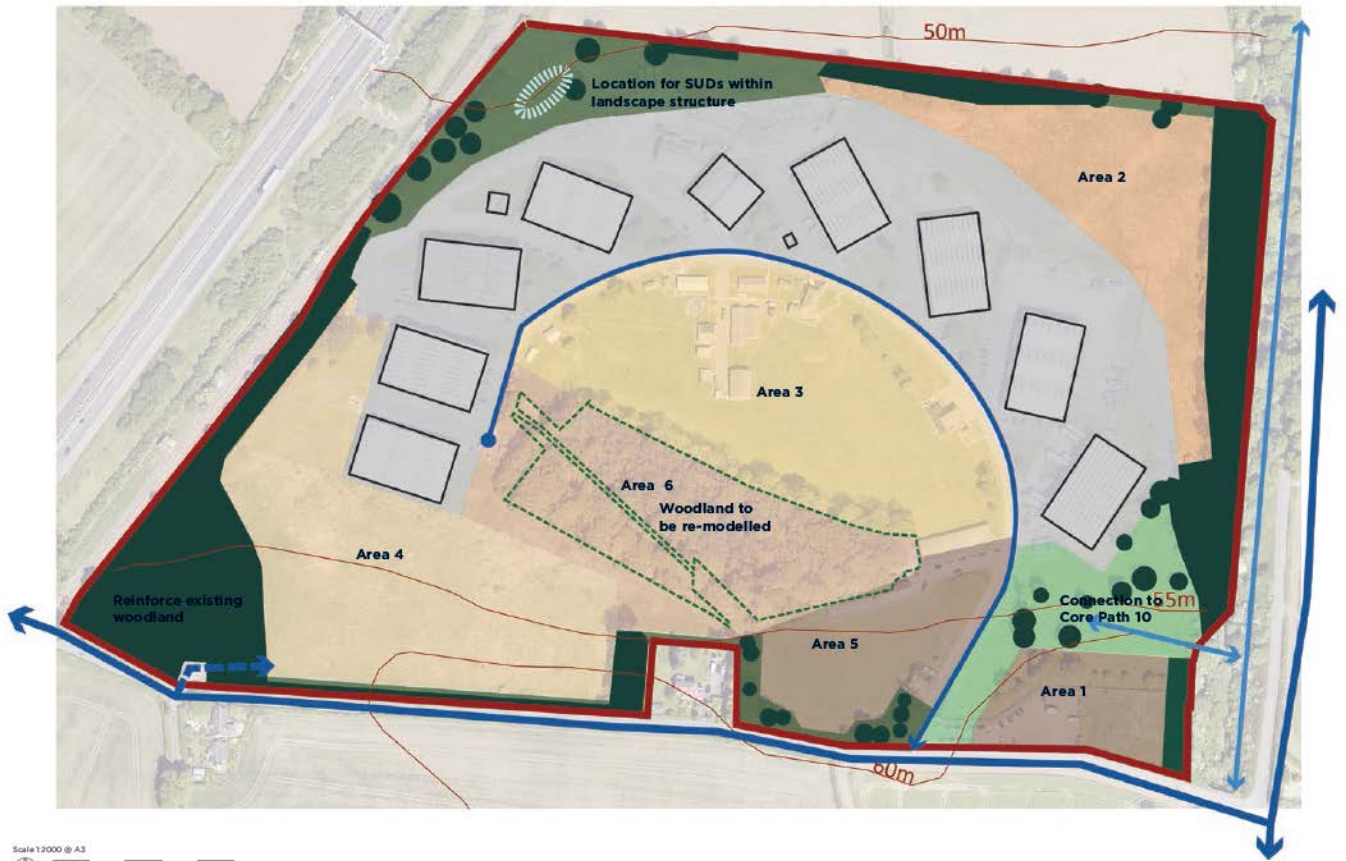
2.24 There is now an even greater need to identify further land for new industrial uses given the Council's preferred approach to housing land set out under Choice 12. This sets out that it is the Council's preferred

option for all new homes to be delivered by the Council and its partners within the urban area. This will require these homes to be delivered on 275 hectares of current employment land.

- 2.25 As part of the supporting documents to 'Choices' a Housing Study has been undertaken by the City of Edinburgh Council to assess a variety of sites within the city with potential for housing. Through this assessment, a large number of existing industrial sites have been identified as being suitable for housing led mixed use development which could result in the loss of existing industrial stock. These sites are set out in appendix 3 and we estimate, would total over 87 hectares of industrial uses across 69 sites. While all these sites may not come forward for the delivery of housing, it is clear that this could lead to a significant displacement of industrial land which would be required to be accommodated elsewhere within the city.
- 2.26 It is clear from the above that new locations need to be identified for further industrial floorspace to meet the city's needs and to replace existing floorspace which is now out of date or likely to be lost to other uses. Royal Elizabeth Yard presents an excellent opportunity to deliver new and improved industrial floor space to help meet the city's business/industry needs and should be identified as a proposed site in City Plan 2030.
- 2.27 The Council's Commercial Needs Study 2018 also identifies that industrial demand is increasingly directed towards strategic locations with good transport links on the edge of urban Edinburgh. Royal Elizabeth Yard is located close to the motorway network and meets this requirement. The fact that the existing units are well let also demonstrates the attractiveness of the location for industrial users.
- 2.28 The site owners can also present their own evidence of demand for further industrial development at the site. This can be found at appendix 4 in the form of advice by Lewis Sutton Property Consultants and relates specifically to the bonded warehousing and distillery industry where strong demand for these uses has been identified. In our submission, this is further evidence to support the principle of industrial uses at the site and that its allocation as a proposed site in City Plan 2030 can therefore be justified.












Royal Elizabeth Yard – Development Strategy

- 2.29 OPEN's development strategy set out in appendix 1 has identified 6 areas of the existing site where further new development could be accommodated. This assessment has demonstrated that the site has the potential to deliver approximately 10.50 hectares of development land for further industrial uses and ancillary development within a brownfield site that is already recognised for similar uses. These could be accessed through the existing site access, with new mixed woodland planting around the perimeter of the site to reinforce existing woodland. The development strategy diagram and key is reproduced below; please refer to section 4.1 of the strategy document for a detailed explanation of these emerging proposals.



Scale 1:2000 @ A3
 0m 20m 40m 60m 80m 100m

fig. 41: Development strategy

-  Existing Buildings to be retained
-  Existing Yard space to be retained
-  Existing Woodland to be retained
-  Existing Woodland to be re-modelled
-  Existing Trees to be removed
-  Proposed landscape
-  Existing Landscape to be retained
-  Proposed location for SUDs facility
-  Existing Cycle Route
-  Existing Roads
-  Site Boundary

3. Conclusion

- 3.1 On behalf of Cinnamon Sedge LLP, we welcome this opportunity to submit representations to Choices for City Plan 2030. These representations support the identification of Royal Elizabeth Yard as an existing business and industry site and as a proposal to accommodate further industrial uses.
- 3.2 Royal Elizabeth Yard is a well established multi-let industrial site which comprises approximately 190,000sq ft of industrial development. The site plays an import role in providing jobs, investment and delivering industrial floorspace. Accordingly, it should be allocated as an existing business and industry site in City Plan 2030 to recognise its economic value.
- 3.3 As part of a greenbelt review, the site should be considered for removal from the greenbelt as a large scale industrial operation. Alternatively, it could be identified as a business/industrial site washed over by the green belt, similar to the likes of RBS Gogarburn which is a special economic area in the green belt.
- 3.4 The Royal Elizabeth Yard site is inefficient and underutilised and has the potential to accommodate further industrial uses. As such, the site should also be identified in City Plan 2030 as a site for proposed new industrial development to help meet the city's industrial needs. There is a clear need to identify further sites for business and industrial uses given the findings of the Council's Commercial Needs Study and in response to the Council's preferred option for housing which will see a substantial amount of existing industrial sites redeveloped for housing led mixed use development. OPEN's development strategy identifies that the site has the potential to accommodate approximately 10.50 ha of additional development, and has demonstrated that further development would be acceptable in landscape and visual terms and have an acceptable impact on rural character. The principle of intensification for industrial uses is also viable from a transportation perspective.

Contact Details

Enquiries

Caroline Nutsford
0131 469 6068
Caroline.nutsford@avisonyoung.com

Visit us online

avisonyoung.co.uk