

Customer Ref: 01689 Response Ref: ANON-KU2U-GW38-G  
Name Montagu Evans LLP  
Response Type Agent / Consultant  
On behalf of: Lady Road Investment SARL (LRIS)

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

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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Choice **1 F**

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

Short Response

Explanation

Choice **1 F**

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

Short Response

Explanation

Choice **1 G**

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

Short Response

Explanation

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Choice **1 H**

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

Short Response

Explanation

Choice **2 A**

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

Short Response

Explanation

Choice **2 B**

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

Short Response

Explanation

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Choice **2 C**

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

Short Response

Explanation

Choice **2 D**

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

Short Response

Explanation

Choice **3 A**

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

Short Response

Explanation

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Choice **4 A**

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

Short Response

Explanation

Choice **4 B**

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

Short Response

Explanation

Choice **5 A**

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

Short Response

Explanation

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Choice 5 B

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

Short Response

**Explanation** Choice 5 states in relation to Transport Infrastructure that the delivery of the Tram along the South East Edinburgh via BioQuarter (Corridor 3) has been identified as being suitable for the delivery of new transit solutions to help deliver City Plan 2030. Our client supports the extension of the tram network (Corridor 3) as it will provide connection to Cameron Toll and links to the south east of Edinburgh from the city centre. LRIS support the principle of Corridor 3 and would like to be involved in discussions and work with the City of Edinburgh Council in order to be able to provide the most appropriate location for the tramline and tram stop at Cameron Toll.

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**

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Choice **5 D1**

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

Short Response

Explanation

Choice **5 D2**

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

Short Response

Explanation

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



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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** LRIS are supportive of Choices 6, 7 and 8 by creating places that focus on people, not cars, and support the reduction of car use. The development at Cameron Toll is reliant on existing sustainable infrastructure, including (future) tram and bus, as well as cycle and pedestrian infrastructure. LRIS agree with the Council's continued prioritisation of pedestrians and cyclists over cars and the promotion of more active and sustainable travel choices to reduce the overall reliance on car usage. Cameron Toll is in a location that is considered to be highly accessible by all modes of transportation.

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**

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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 LRIS are supportive of Choices 6, 7 and 8 by creating places that focus on people, not cars, and support the reduction of car use. The development at Cameron Toll is reliant on existing sustainable infrastructure, including (future) tram and bus, as well as cycle and pedestrian infrastructure. LRIS agree with the Council's continued prioritisation of pedestrians and cyclists over cars and the promotion of more active and sustainable travel choices to reduce the overall reliance on car usage. Cameron Toll is in a location that is considered to be highly accessible by all modes of transportation.

Choice **7 B**

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

Short Response

Explanation

Choice **7 C**

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

Short Response

Explanation

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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 LRIS are supportive of Choices 6, 7 and 8 by creating places that focus on people, not cars, and support the reduction of car use. The development at Cameron Toll is reliant on existing sustainable infrastructure, including (future) tram and bus, as well as cycle and pedestrian infrastructure. LRIS agree with the Council's continued prioritisation of pedestrians and cyclists over cars and the promotion of more active and sustainable travel choices to reduce the overall reliance on car usage. Cameron Toll is in a location that is considered to be highly accessible by all modes of transportation.

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

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Choice 8 C

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

Short Response

Explanation

Choice 8 C

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

Short Response

Explanation

Choice 9 A

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

Short Response

Explanation

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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 Not Answered

Explanation Not Answered

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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** Within Choice 10, the Choices Paper proposes that a new policy on purpose-built student accommodation (PBSA) may be introduced in City Plan 2030. This policy may require all new PBSA to be located on a direct route to a university or college and that it is built for and managed by a university or college. The policy may limit the total number of studios in a PBSA scheme to a maximum of 10% of the total number of bed spaces and require that market and affordable housing is also delivered as part of the overall development. Our client is concerned in relation to the proposed policy option that may require all future PBSA in Edinburgh to be built for and managed by a university or college in the city. It is not considered that a University or College involvement should be the sole determinant of acceptability, nor should there be an obligation placed on universities or colleges to take on the management of all PBSA.

If the Council choose to implement this, there is a risk that the policy option could create a monopoly over PBSA in the city, which could reduce competition between operators, adversely impact on pricing, and divert future investment away from Edinburgh. In terms of where PBSA should be located, our client agrees with the Council’s current approach under ‘Policy Hou 8 Student Accommodation’ that PBSA should be granted planning permission when it is appropriately located in terms of access to a university or college by walking, cycling or public transport. Our client agrees with the current approach under Policy Hou 8 in that good connectivity is an important factor in reducing the need for students to travel, enhancing student satisfaction and working towards improving environmental sustainability. Our client would therefore submit that introducing a policy provision that requires all new PBSA to be located on a “direct” route to a university or college is too restrictive, and that retaining the “good connectivity” approach as set out in Policy Hou 8 more generally, is the preferred option.

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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 also proposes that new purpose built student accommodation will require to deliver market and affordable housing as part of the mix. One of the options for this policy is for any development of 0.25hectares or over for student housing, hotels, retail and leisure developments, at least 50% of the site should be provided for housing. Whilst our client acknowledges and supports a mix of uses on the site at Cameron Toll, it is submitted that the mix should be market driven, with each site being assessed on their individual merits. Not all sites will be suitable or desirable for residential development, and this should not be to the detriment of being able to provide other uses such as hotels, student accommodation and retail and leisure development.

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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 10 proposes that a new policy is introduced to ensure the better use of single use out of centre retail units and commercial centres, where their redevelopment for mixed use including housing would be supported. Our client is supportive of diversifying the range of uses that currently exist within Cameron Toll Commercial Centre. There is currently a live application for a proposed cinema development, and other uses such as hotel, student accommodation and residential developments are all under consideration. This would involve the promotion of community uses and facilities within the area. The site is located next to a number of excellent community facilities, such as Inch Park, the Scouts, and Craigmillar Park Tennis Club. Improving the links between the Commercial Centre and these facilities is an important part of the masterplan. A number of meetings have taken place with the City of Edinburgh Council, in particular with their planning policy and transportation teams and it is agreed that a mix of uses can be considered appropriate for the site. This could include neighbourhood / community uses, (such as doctors, dentists, childcare facilities etc), residential, hotel, student accommodation all of which would complement the existing uses within the Commercial Centre and the surrounding area. A draft masterplan vision for the whole of the site is in place and our client is looking to engage with the City of Edinburgh Council, the local community, businesses and residents in order to realise the potential of the Commercial Centre and meet the needs of the local community. The first phase of this Masterplan is for the cinema development, along with ancillary Classes 1, 2 and 3 units to be provided on site. Our client has an operator for the cinema development (Empire) and it is considered that the development of the cinema will trigger an interest for other future developments to come forward on site. Our client is supportive of the principle of Choice 10 within the Main Issues Report, to allow other uses such as leisure, hotel, student accommodation and residential development within the Commercial Centre. Links with the existing community facilities are also part of this masterplan.



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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

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

Explanation

Choice **12 A**

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

Short Response

Explanation

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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

Explanation

Choice **12 B2**

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

Short Response

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

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Choice **12 B4**

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

Short Response

Explanation

Choice **12 B5**

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

Short Response

Explanation

Choice **12 B6**

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

Short Response

Explanation

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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

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

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Email

Response Type

On behalf of:

Choice **12 B10**

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

Short Response

Explanation

Choice **12 BX**

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

Short Response

Explanation

Choice **12 C**

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

Short Response

Explanation

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Response Type

On behalf of:

Choice 12 C

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

Short Response

Explanation

Choice 12 C

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

Short Response

Explanation

Choice 12 D

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

Short Response

Explanation

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Choice **13 A**

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

Short Response

Explanation

Choice **14 A**

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

Short Response

Explanation

Choice **14 B**

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

Short Response

Explanation

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Choice **14 C**

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

Short Response

Explanation

Choice **15 A**

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

Short Response

Explanation

Choice **15 B**

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

Short Response

Explanation



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Choice 15 C

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

Short Response

Explanation

Choice 15 D

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

Short Response

Explanation

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Choice 15 E

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

Short Response

**Explanation**

Choice 15 states that the Council want to support hotel provision in local, town, commercial centres and other locations with good public transport access throughout Edinburgh in response to evidence of strong growing visitor demand and reflecting limited availability of sites in the city centre. Our client is supportive of this choice and consider that there is the ability for Commercial Centres to offer a mix of uses as part of the Commercial Centre offering.

Cameron Toll is well located with regards to good public transport access. The main bus operator serving the site is Lothian Buses, providing direct services between the site and Edinburgh City Centre, the south of the city and outlying settlements such as Loanhead, Bonnyrigg and Dalkeith. In total, approximately 60 buses per hour can be accessed within a 5 minute walk of Cameron Toll. A safeguard for Tram Route 3 is located along the northern boundary of the site at Lady Road. Our client considers that along with hotel development, Cameron Toll Commercial Centre can also provide a diverse range of uses that are complementary to the existing retail / restaurant use that exists on site. As previously mentioned a Class 11 (gym) use is operational on site, and there is currently a planning application for a Class 11 (cinema use). The principle of the cinema use has already been established on site with regards to the planning approval of 09/01141/FUL, which allowed an extension to the retail floorspace, along with additional, Class 3, and Class 11 (cinema) use. It is submitted that a hotel use on the site, within the boundary of the Cameron Toll Commercial Centre would be an appropriate use within the site and would positively complement the existing surrounding uses. It is noted within the Choices Paper (Choice 10), that additional land uses could be appropriate within Commercial Centres and our client is supportive of the principle of this choice as well. Our client supports the principle of Choice 15 for the Council to support hotel provision in commercial centres.

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Choice 15 G

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

Short Response

Explanation

Choice 16 A1

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

Short Response

Explanation

Choice 16 A2

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

Short Response

Explanation

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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

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

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Choice 16 A5

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

Short Response

Explanation

Choice 16 B

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

Short Response

Explanation

Choice 16 C

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

Short Response

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Choice 16 E1

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

Short Response

Explanation

Choice 16 E2

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

Short Response

Explanation

Choice 16 E3

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

Short Response

Explanation

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Choice 16 E4

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

Short Response

Explanation

Choice 16 E5

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

Short Response

Explanation

Choice 16 E6

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

Short Response

Explanation

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Choice 16 E7

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

Short Response

Explanation

Choice 16 E8

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

Short Response

Explanation

Choice 16 EX

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

Short Response

Explanation



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Choice 16 F

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

Short Response

Explanation

Choice 16 G

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

Short Response

Explanation

Choice 16 H

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

Short Response

Explanation

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**Response Ref:**

ANON-KU2U-GW38-G

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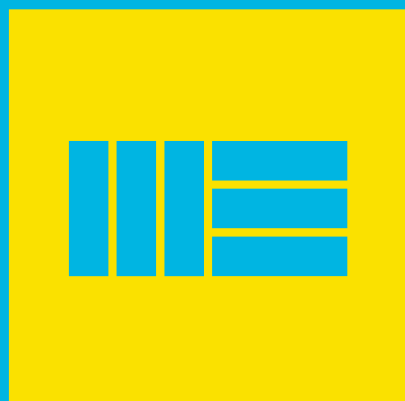
Lady Road Investment SARL (LRIS)

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# CHOICES FOR CITY PLAN 2030

**REPRESENTATION** ON BEHALF OF  
**LADY ROAD INVESTMENT SARL,**  
**CAMERON TOLL**

APRIL 2020



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# 1 INTRODUCTION

- 1.1 Montagu Evans LLP act on behalf of Lady Road Investment SARL (LRIS), owners of Cameron Toll Shopping Centre, Edinburgh.
- 1.2 Cameron Toll is located to the south east of Edinburgh City Centre and is identified as a Commercial Centre within the current Edinburgh Local Development Plan 2016. It currently provides much needed neighbourhood / community uses serving the south east of Edinburgh.
- 1.3 The Commercial Centre is currently utilised for predominantly Class 1 retail uses (food and non food), along with Class 3 uses, including 2 drive thrus, located to the east of the site. A recent planning permission was granted for a Class 11 gym operator, which is operational within the Commercial Centre.
- 1.4 A planning application has recently been lodged with the City of Edinburgh Council for a Cinema and proposed Class 1, 2 and 3 uses. The proposals present an updated vision to deliver a Cinema and follow on from a previous planning permission for a major redevelopment and expansion of the centre to include cinema and leisure uses.
- 1.5 There are a number of alternative neighbouring uses, including residential, tennis club, Inch Park, doctor's surgery, and Edinburgh University's Peffermill Sports Campus.

## **LOCAL DEVELOPMENT PLAN REVIEW**

- 1.6 The City of Edinburgh Council (CEC) have started the process of reviewing the current Edinburgh Local Development Plan (LDP), which was adopted by the Council in November 2016.
- 1.7 The first stage of the review is the production of a Main Issues Report (MIR). 'Choices for City Plan 2030' was published by the Council on 31 January 2020. The MIR sets out the Council's broad aspiration's that by 2030 Edinburgh will be:-
  - *"A sustainable city which supports everyone's physical and mental wellbeing;*
  - *A city where you don't need to own a car to move around;*
  - *A city in which everyone lives in a home they can afford; and*
  - *A city where everyone shares in its economic success".*
- 1.8 These aspirations are supported by 16 proposed policy changes.
- 1.9 The MIR is currently subject to a public consultation period that will run until 30 April 2020.
- 1.10 As a key stakeholder within Edinburgh, LRIS welcomes the opportunity to respond to the MIR.

## **LADY ROAD INVESTMENT MASTERPLAN STRATEGY**

- 1.11 The owners of Cameron Toll Shopping Centre have been developing a masterplan strategy over a number of years in order to diversify the role of the Commercial Centre in order to attract and maintain relevance to all members of the community.

- 1.12 There is a recognised need to improve the variety of provision at Cameron Toll to ensure that the centre can continue to remain attractive and competitive and be able to perform its function as a commercial centre serving the south and east of the city.
- 1.13 It is considered that the allowance of a mix of uses on site, will enable the centre to sustain its function to the local community as a commercial centre.

# 2 REPRESENTATION

- 2.1 As a key stakeholder in Edinburgh, LRIS welcome the opportunity to respond to the Choices for City Plan 2030.
- 2.2 Lady Road Investment SARL consider that the following choices are most relevant to them and that if implemented, could have the greatest impact on the operation of the Commercial Centre.

## **CHOICE 5 – DELIVERING COMMUNITY INFRASTRUCTURE**

- 2.3 Choice 5 states in relation to Transport Infrastructure that the delivery of the Tram along the South East Edinburgh via BioQuarter (Corridor 3) has been identified as being suitable for the delivery of new transit solutions to help deliver City Plan 2030.
- 2.4 Our client supports the extension of the tram network (Corridor 3) as it will provide connection to Cameron Toll and links to the south east of Edinburgh from the city centre. LRIS support the principle of Corridor 3 and would like to be involved in discussions and work with the City of Edinburgh Council in order to be able to provide the most appropriate location for the tramline and tram stop at Cameron Toll.

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

## **CHOICE 7 – SUPPORTING THE REDUCTION IN CAR USE IN EDINBURGH**

## **CHOICE 8 – DELIVERING NEW WALKING AND CYCLING ROUTES**

- 2.5 LRIS are supportive of Choices 6, 7 and 8 by creating places that focus on people, not cars, and support the reduction of car use.
- 2.6 The development at Cameron Toll is reliant on existing sustainable infrastructure, including (future) tram and bus, as well as cycle and pedestrian infrastructure.
- 2.7 LRIS agree with the Council's continued prioritisation of pedestrians and cyclists over cars and the promotion of more active and sustainable travel choices to reduce the overall reliance on car usage.
- 2.8 Cameron Toll is in a location that is considered to be highly accessible by all modes of transportation.

## **CHOICE 10 – CREATING SUSTAINABLE COMMUNITIES**

- 2.9 Choice 10 proposes that a new policy is introduced to ensure the better use of single use out of centre retail units and commercial centres, where their redevelopment for mixed use including housing would be supported.
- 2.10 Our client is supportive of diversifying the range of uses that currently exist within Cameron Toll Commercial Centre. There is currently a live application for a proposed cinema development, and other uses such as hotel, student accommodation and residential developments are all under consideration. This would involve the promotion of community uses and facilities within the area. The sites is located next to a number of excellent community facilities, such as Inch Park, the Scouts, and Craigmillar Park Tennis Club. Improving the links between the Commercial Centre and these facilities is an important part of the masterplan.
- 2.11 A number of meetings have taken place with the City of Edinburgh Council, in particular with their planning policy and transportation teams and it is agreed that a mix of uses can be considered appropriate for the site.

This could include neighbourhood / community uses, (such as doctors, dentists, childcare facilities etc), residential, hotel, student accommodation all of which would complement the existing uses within the Commercial Centre and the surrounding area.

- 2.12 A draft masterplan vision for the whole of the site is in place and our client is looking to engage with the City of Edinburgh Council, the local community, businesses and residents in order to realise the potential of the Commercial Centre and meet the needs of the local community.
- 2.13 The first phase of this Masterplan is for the cinema development, along with ancillary Classes 1, 2 and 3 units to be provided on site. Our client has an operator for the cinema development (Empire) and it is considered that the development of the cinema will trigger an interest for other future developments to come forward on site.
- 2.14 Our client is supportive of the **principle** of Choice 10 within the Main Issues Report, to allow other uses such as leisure, hotel, student accommodation and residential development within the Commercial Centre. As mentioned in paragraph 2.6, links with the existing community facilities are also part of this masterplan.

#### **Purpose Built Student Accommodation**

- 2.15 Within Choice 10, the Choices Paper proposes that a new policy on purpose-built student accommodation (PBSA) may be introduced in City Plan 2030. This policy may require all new PBSA to be located on a direct route to a university or college and that it is built for and managed by a university or college. The policy may limit the total number of studios in a PBSA scheme to a maximum of 10% of the total number of bed spaces and require that market and affordable housing is also delivered as part of the overall development.
- 2.16 Our client is concerned in relation to the proposed policy option that may require all future PBSA in Edinburgh to be built for and managed by a university or college in the city. It is not considered that a University or College involvement should be the sole determinant of acceptability, nor should there be an obligation placed on universities or colleges to take on the management of all PBSA.
- 2.17 If the Council choose to implement this, there is a risk that the policy option could create a monopoly over PBSA in the city, which could reduce competition between operators, adversely impact on pricing, and divert future investment away from Edinburgh.
- 2.18 In terms of where PBSA should be located, our client agrees with the Council's current approach under 'Policy Hou 8 Student Accommodation' that PBSA should be granted planning permission when it is appropriately located in terms of access to a university or college by walking, cycling or public transport. Our client agrees with the current approach under Policy Hou 8 in that good connectivity is an important factor in reducing the need for students to travel, enhancing student satisfaction and working towards improving environmental sustainability
- 2.19 Our client would therefore submit that introducing a policy provision that requires all new PBSA to be located on a "*direct*" route to a university or college is too restrictive, and that retaining the "*good connectivity*" approach as set out in Policy Hou 8 more generally, is the preferred option.

#### **Requirement for residential development on developments sites over 0.25 hectares**

- 2.20 Choice 10 also proposes that new purpose built student accommodation will require to deliver market and affordable housing as part of the mix. One of the options for this policy is for any development of 0.25hectares or over for student housing, hotels, retail and leisure developments, at least 50% of the site should be provided for housing. Whilst our client acknowledges and supports a mix of uses on the site at Cameron Toll, it is



submitted that the mix should be market driven, with each site being assessed on their individual merits. Not all sites will be suitable or desirable for residential development, and this should not be to the detriment of being able to provide other uses such as hotels, student accommodation and retail and leisure development.

## **CHOICE 15 – PROTECTING OUR CITY CENTRE, TOWN AND LOCAL CENTRES**

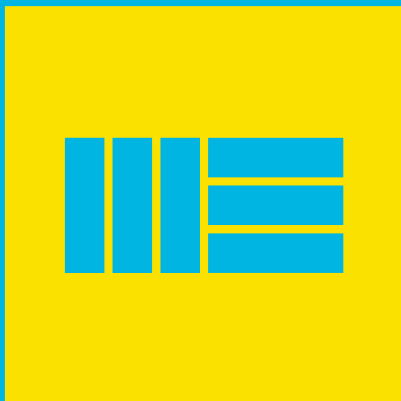
- 2.21 Choice 15 states that the Council want to support hotel provision in local, town, commercial centres and other locations with good public transport access throughout Edinburgh in response to evidence of strong growing visitor demand and reflecting limited availability of sites in the city centre.
- 2.22 Our client is supportive of this choice and consider that there is the ability for Commercial Centres to offer a mix of uses as part of the Commercial Centre offering.
- 2.23 Cameron Toll is well located with regards to good public transport access. The main bus operator serving the site is Lothian Buses, providing direct services between the site and Edinburgh City Centre, the south of the city and outlying settlements such as Loanhead, Bonnyrigg and Dalkeith. In total, approximately 60 buses per hour can be accessed within a 5 minute walk of Cameron Toll. A safeguard for Tram Route 3 is located along the northern boundary of the site at Lady Road.
- 2.24 Our client considers that along with hotel development, Cameron Toll Commercial Centre can also provide a diverse range of uses that are complementary to the existing retail / restaurant use that exists on site. As previously mentioned a Class 11 (gym) use is operational on site, and there is currently a planning application for a Class 11 (cinema use). The principle of the cinema use has already been established on site with regards to the planning approval of 09/01141/FUL, which allowed an extension to the retail floorspace, along with additional, Class 3, and Class 11 (cinema) use.
- 2.25 It is submitted that a hotel use on the site, within the boundary of the Cameron Toll Commercial Centre would be an appropriate use within the site and would positively complement the existing surrounding uses.
- 2.26 It is noted within the Choices Paper (Choice 10), that additional land uses could be appropriate within Commercial Centres and our client is supportive of the principle of this choice as well.
- 2.27 Our client supports the principle of Choice 15 for the Council to support hotel provision in commercial centres.

# 3 SUMMARY

- 3.1 There is a recognised need to improve the variety of provision at Cameron Toll to ensure that the Commercial Centre can continue to remain attractive and competitive and be able to perform its function as a Commercial Centre serving the south and east of the city.
- 3.2 It is considered that the allowance of a mix of uses on site, will enable the Commercial Centre to sustain its function to the local community as a Commercial Centre. These uses include; leisure, hotel, residential and student accommodation.
- 3.3 Lady Road Investment SARL support the Choices 3 and 15 with regards to the Choices Paper for City Plan 2030. There is support in principle for Choice 10, but the detail of the proposals is considered to be too stringent for new development proposals, and requires to be more flexible to accommodate current market requirements.
- 3.4 We trust that the above and attached will be given due regard in the process of preparing the new City Plan 2030. We would be grateful to be kept advised of future opportunities to engage in the process and would be pleased to meet with the Council to further discuss matters as required.

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