

Customer Ref: 00034 Response Ref: ANON-KU2U-GPUZ-D
Name Philip Neaves
Response Type Agent / Consultant
On behalf of: Leonardo MV

Supporting Info Yes
Email philip@felshampd.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 C

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

Short Response

Explanation

Choice 5 D1

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

Short Response

Explanation

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Choice 5 D2

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

Short Response

Explanation

Choice 5 E

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

Short Response

Explanation

Choice 6 A

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

Short Response

Explanation

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Choice **6 B**

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

Short Response

Explanation

Choice **7 A**

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

Short Response

Explanation Our clients agree that parking provision should be flexible and based on a development's location, and the specific type of development. There must be flexibility within any policy to examine the specific nature of the business needs and not just that it falls within i.e. Business and Industrial. If a business cannot facilitate the needs of the workforce, the business will fail to secure the skilled employees required or the business will be required to relocate to locations that are sustainable for their needs. The third priority of National Transport Policy stresses adaptability and notes that whilst the desire is for modal shift that may not always be possible. The explanatory paragraph on page 37 discusses the need to manage emissions whilst recognising that the car will remain an important transport option. National policy recognises that car parking will need to remain a transport option and the City Plan should not, in our view, be drafted in such a way that it does not allow for consideration of specific or unique business needs. We have submitted a fuller representation to this consultation. Please refer this for more information.

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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

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Choice **8 B**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

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Choice 9 A

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

Short Response

Explanation

Choice 9 B

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

Short Response

Explanation

Choice 10 A

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

Short Response

Explanation

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Choice **10 B**

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

Short Response

Explanation

Choice **10 C**

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

Short Response

Explanation

Choice **11 A**

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

Short Response

Explanation

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Response Type

On behalf of:

Supporting Info

Email

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

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

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Email

Choice **12 B2**

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

Short Response

Explanation

Choice **12 B3**

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

Short Response

Explanation

Choice **12 B4**

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

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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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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Response Type

On behalf of:

Supporting Info

Email

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

Customer Ref: Response Ref:

Name

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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Choice **16 A1**

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

Short Response

Explanation

Choice **16 A2**

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

Short Response

Explanation

Choice **16 A3**

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

Short Response

Explanation

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Choice 16 A4

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

Short Response

Explanation

Choice 16 A5

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

Short Response

Explanation

Choice 16 A5

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

Short Response

Explanation

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Choice **16 B**

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

Short Response

Explanation

Choice **16 C**

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

Short Response

Explanation

Choice **16 E1**

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

Short Response

Explanation

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Choice 16 E2

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

Short Response

Explanation

Choice 16 E3

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

Short Response

Explanation

Choice 16 E4

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

Short Response

Explanation

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Choice 16 E5

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

Short Response

Explanation

Choice 16 E6

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

Short Response

Explanation

Choice 16 E7

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

Short Response

Explanation

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Choice 16 E8

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

Short Response

Explanation

Choice 16 EX

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

Short Response

Explanation

Choice 16 F

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

Short Response

Explanation

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Choice **16 G**

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

Short Response

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

Leonardo UK (Edinburgh) – 2 Crewe Road North, Edinburgh, EH5 2XS**Choices for City Plan 2030 - Edinburgh City Plan 2030 Public Consultation
April 2020****1.0 Introduction**

Felsham Planning and Development is planning advisor to Leonardo. This submission is made in respect of the Choices for City Plan 2030.

We have considered the Choices for City Plan 2030 (The Plan) and in particular, Choice 7 – Supporting the reduction in car use in Edinburgh.

Our clients support the improvement in transport systems within the plan area and support the move to increased walking, cycling and use of public transport. Our clients request that any introduced policies maintain flexibility to recognise the specific needs of specialised businesses in setting parking requirements in developments.

2.0 The Company

Leonardo is one of the UK's leading aerospace companies and one of the biggest suppliers of defence and security equipment to the UK MoD. The company employs around 7,000 people across the UK, 67% of whom hold highly skilled positions. They are one of the UK's largest employers of engineering apprentices and graduates, investing around £3.5 million on employee training and development annually and actively supports STEM.

They have six major sites across the UK, each bringing investment into the local economy and wider region through strong links with supply chain companies in the surrounding areas. They spend approximately £650m with around 2,300 companies in their UK supply chain every year.

Leonardo invests around £200m in the UK in Research and Development each year and they generate exports worth over £1 billion to the UK economy.

With Queen's Awards for Enterprise in Innovation and International Trade, Leonardo's Edinburgh site employs over 2000 employees who specialise in the provision of multi-role surveillance radars and countermeasure systems. Originally built in 1943, the site has a rich heritage of innovation, and today it produces world leading technology, including lasers for the US Army's Apache helicopter, CAPTOR radar for the Typhoon, the Osprey radar for Norway's all-weather search and rescue helicopters (NAWSARH), the Seaspray Radar for the US Coast Guard, and the Raven radar for Saab's Gripen Fighter aircraft.

The company has also been supporting the UK Ministry of Defence Covid 19 operations with its AW159 Wildcat helicopters and has also been manufacturing Personal Protective Equipment (PPE) to help protect NHS Staff and critical workers.

3.0 The Need for Flexibility

Leonardo is looking to extend the number of car parking spaces that they have on site in order for their business to continue to grow and run efficiently. The company employs more than 2000 people and is one of the City's most important employers, providing highly specialised and highly skilled jobs.

As a key employer vital to the local economy, they provide not only highly skilled jobs, but huge investment to a wider local supply chain, research and development, apprentices and graduates opportunities, and, exports for the wider country.

This is a sophisticated business that not only benefits the local economy but has a much wider influence within Scotland and the UK as a whole.

The business draws a highly skilled workforce from a wide area around the city and further afield. Given its peripheral location in north Edinburgh and the fact that its skilled work force is drawn from a wide area beyond Edinburgh car trips are for many employees and visitors the most convenient and time efficient way of accessing the site. The required need for car journeys includes for shift working and shift changeovers.

The company operates a partial shift system, which will vary depending on the need, workload etc. but a usual day will be 07:00 -18:00. The company is running a shift system now to accommodate the social distancing guidelines. Shift changes reflect the needs of the business and the requirement for potential 24hour working. The spatial distribution of the employees surrounding Edinburgh and beyond means that car journeys are the most flexible, safe and efficient method of travel.

Current park and ride infrastructure within the Plan area mean that travel to our Client's business location using this form of travel is typically over 40 minutes and sometimes over 1 hour, depending on the time of day. There is also a need for more than one bus to be taken and an element (sometimes significant) of walking. During shift working the use of park and ride facilities is possible but may not be desirable due to the need to walk during darkness, unpopulated routes and a late hour at night.

Leonardo is willing to invest in other more sustainable systems and has invested in electric vehicle charging points and maximising secure weatherproof cycle parking, especially in the context of the cycle routes adjacent to the site.

In that context, there is a clear case for recognition of the type of work carried out by the business and the need to bring highly skilled workers from the Central Belt of Scotland to the facility for work. This journey must be recognised as needing to be a comfortable journey considering the skill catchment and business location and recognition that car travel may be a reasonable method until public transport is a viable alternative. The ability to relax parking standards would recognise the importance of specific employers to the city as a whole and to attract the suitable workforce for that business.

Leonardo recognises the direction that transport policy is taking but wishes to stress the need for flexibility. There are currently less than 1000 parking spaces for the 2000 employees. Therefore, the company is already committed to encouraging its employees to use means of transport other than the car. However, in our submission, policy needs to be drafted and applied in a practical way and allow for relaxation of standards to meet specific needs. We envisage a policy that allows for consideration of additional parking spaces when this is accompanied by a Green Travel Plan that investigates all transport options and seeks to maximise the use of other modes of transport whilst allowing for additional parking spaces.

4.0 Planning and Transport Policy

The Town & Country Planning Act requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. The House of Lords in its judgement in the City of Edinburgh Council v Secretary of State for Scotland case 1998 (SLT120) ruled that *'although priority must be given to the Development Plan in determining a planning application, there is built in flexibility depending on the facts and circumstances of each case'*. This judgement, along with others such decisions like Tesco Stores v. Dundee [2012] PTSR 983, demonstrate that the Courts have confirmed that the Development Plan provides the planning authority with discretionary powers and these can be used flexibly.

Planning policy should also contain discretionary elements, which provide controls on car parking but allow for exceptions. Car parking policy could be drafted to identify exempted employers or contain a mechanism for a case by case assessment.

Scottish Planning Policy states that development planning should:

- Support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area..." (paragraph 30)

National Transport Strategy has 4 key priorities, and each has 3 associated Outcomes, The Vision, Priorities and Outcomes.

The 3rd Priority is *Helps Deliver Inclusive Economic Growth* and it states that the transport system "will adapt to changing requirements of our citizens, businesses and visitors" and *"Will be reliable, efficient and high quality: everyone needs to be confident about how long a journey will take, and that it will be a simple and comfortable experience. We will be able to plan our lives, to get to work on time, access education and training, and to deliver goods efficiently and keep businesses running smoothly"*

Page 37, states: *While it will be important for people to make fewer journeys by emission-producing vehicles, it must be recognised that people need to travel, and our transport system is important to how we live our lives. But we need to manage our transport assets effectively and invest efficiently in the resources needed to maintain and safely operate them and to make better use of existing capacity.*

This recognises the need for flexibility to reflect the changing requirements of businesses and confidence in journeys duration, comfort and to ensure efficient travel to work.

5.0 Response to Choice 7 - Proposed Changes

We have briefly responded to the specific questions asked in Choice 7, page 19, of the Plan below. The full response and wider points on behalf of our client are covered by the previous sections of this response above.

- 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.**

Our clients agree that parking provision should be flexible and based on a development's location, and the specific type of development. There must be flexibility within any policy to examine the specific nature of the business needs and not just that it falls within i.e. Business and Industrial. If a business cannot facilitate the needs of the workforce, the business will fail to secure the skilled employees required or the business will be required to relocate to locations that are sustainable for their needs.

The third priority of National Transport Policy stresses adaptability and notes that whilst the desire is for modal shift that may not always be possible. The explanatory paragraph on page 37 discusses the need to manage emissions whilst recognising that the car will remain an important transport option. National policy recognises that car parking will need to remain a transport option and the City Plan should not, in our view, be drafted in such a way that it does not allow for consideration of specific or unique needs.

- 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.**

Our Clients business is not located within the City Centre and therefore do not comment.

- 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.**

Our clients agree that parking provision should be controlled and support other modes and types of transport recognising technological advances. As mentioned above, the future policy needs to be flexible and based on the developments location and the specific type and needs of the development. Arbitrary restrictions on a category of development to control demand do not take into account the nuances of a business. There must be flexibility within any policy to examine the specific nature of the business needs and not just that it falls within i.e. Business and Industrial.

- D. We want to support the city's park and ride infrastructure by safeguarding sites for new park and ride at Gilmerton Road and Lasswade Road and extensions to the current sites at Hermiston**

and Newcraighall. There is also the potential to safeguard an extension to the park and ride at Ingliston as part of the International Business Gateway masterplan. Policies on Park and Rides will be amended to reference these sites and any other sites that are identified in the City Mobility Plan or its action plan.

Our clients consider that Park and Ride provision is a good way to facilitate travel into the City. Current park and ride infrastructure mean that travel to the business location using this form of travel is typically over 40 minutes and needing more than one vehicle and an element of walking. During shift working the use of park and ride facilities is possible but may not be desirable due to the need to walk during darkness, unpopulated routes and a late hour at night.

6.0 Conclusion

We have considered the specific questions asked in Choice 7, page 19, of the Plan and the intent behind:

Where there are good public transport options, an environment that supports walking and cycling, and access to car club vehicles, or other shared mobility scheme, there is less need to own a car. We want City Plan 2030 to have no minimum standards for car parking – potentially leading to car-free developments the below.

Our client recognises the importance of sustainable travel patterns and has taken measures to help achieve a modal shift. However, in preparing policy it is important that it addresses the world as it is, whilst also trying to shape a new future. The need for flexibility to consider additional car parking on a case by case basis will remain throughout the life of the next LDP because transport infrastructure in Edinburgh does not exist to the extent that it will allow for a wide spread modal shift. Our suggestion is that policy is drafted to allow for the possibility of additional car parking to be considered as part of a wider review of an organisation's overall travel plans so that if additional car parking is permitted it is provided in the context of having a review of an organisation's operations and taking measures to maximise its transport sustainability

Our Clients support the principle of reducing car journeys and facilitating new and alternative modes of transport, however they respectfully request that in doing so flexibility is incorporated into any future policy to ensure the Planning Department has the ability to recognise the specific needs of a business in relation to car parking and how it has a vital impact on the functioning of that business and its employees. This flexibility should not only reflect the category of business but have the ability to examine the specific nature of the business and its functioning needs.