

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **1 A**

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

Short Response

Explanation

Choice **1 B**

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

Short Response

Explanation

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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 M&M believe that new standards, as alluded to in point E) require to be proportionate and do not all fall on new development proposals to provide. There requires to be a comprehensive audit of existing open space provision throughout the City and only where distinct deficiencies are identified, then a proportionate response is sought via new development, which recognises the proposed use and its impact on green/blue infrastructure.

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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 M&M are committed to any development that they undertake in Edinburgh creating a great new place and contributing to existing communities. M&M are proud of their 95 year history of home building in Edinburgh and the legacy this bequeaths as Scottish housebuilders of fine repute and high standards. M&M support a consistent approach to determining applications for new buildings and places, this is considered essential.

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Name: Anthony Aitken
Response Type: Agent / Consultant
On behalf of: Mactaggart & Mickel LTD

Supporting Info:
Email: anthony.aitken@colliers.com

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: No

Explanation Accessibility for their residents is at the forefront of their design/layout, and is evidenced in a supporting design and access statement with a planning application. The further densification of development to a minimum 65 units per hectare is ambitious and M&M question whether this will allow for a full tenure range on a development. Perhaps this standard could be applied to urban brownfield sites with a range from 50-65 units per Ha in greenfield land releases, in locations, close to public transport and active travel routes. It could be an ambition to get to 65 units per Ha in the future and based on the sites characteristics and context.

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: Yes

Explanation M&M will take full account that their developments streets, road layout and sense of place reflects the Street Design Guidance in Edinburgh and meets the SPP six qualities of a successful place, namely; • Safe • Pleasant • Easy to move around • Welcoming • Adaptable • Energy efficient

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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
M&M recognise that there is a requirement to reduce carbon emissions through both good design and use of low and zero carbon generating technologies. We note the Council's aim for all buildings in Edinburgh to be zero carbon by 2030 and 50% of the carbon reduction target being met through low and zero carbon generating technologies. However, M&M believe that emissions standards for new buildings should continue to sit within the building standards regulatory regime and not the planning system, as this causes needless duplication, when the focus should be on maximising the efficiency of existing planning resource. Therefore, apart from an overall CEC view of seeking to achieve carbon neutral buildings, this should not result in a bespoke planning policy in the LDP.

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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: No

Explanation The ambition of CEC to have Place Briefs prepared in conjunction with local communities in all new housing sites is a significant increase in consultation requirements, especially for those sites below 2Ha in size and which are not major applications in the planning hierarchy of development. It is considered that Place Briefs are best suited to strategic sites and that education, transport and infrastructure provision is best led by expert advice and evidence. There also requires to be a leading role for landowners and developers in the preparation of Place Briefs.

Choice 4 B

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

Short Response: Not Answered

Explanation The new Planning Act allows for Local Place Plans (LPP) to be prepared by local communities and set proposals for development of land of particular significance to a local area. However, it should also be highlighted that the LPP requires to adhere to the LDP and is not to be used as a tool to thwart allocations or development proposals contained in the LDP.

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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 M&M concur with the CEC view that directing development to where there is existing or under-utilised infrastructure is sensible. If new infrastructure is required, improvements are sought and investment needed, then this requires to be guided by Planning Circular 3/2012 – Planning Obligations and the associated tests, in order for a planning agreement (section 75) to be entered into between a developer and the Council. A developer contribution must be proportionate and directly relevant to the development proposal.

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

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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 In terms of Healthcare Infrastructure, it is considered that the planning of future health care services is a matter the NHS Lothians, any impacts should be proportionate and clearly defined by the NHS to CEC in preparing the LDP.

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 A M&M development proposal would take full account of its transport impact and this would be detailed as a supporting report for a planning application on an M&M development site. M&M aim to promote landholdings that are located in sustainable locations where there are nearby walking routes of public transport provision.

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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

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

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01694

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Supporting Info

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Anthony Aitken

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Response Type

Agent / Consultant

On behalf of:

Mactaggart & Mickel LTD

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

Yes

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

Yes

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

Yes

Explanation

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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

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

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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? - 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

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

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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

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 M&M support the aim to increase the number of new homes in Edinburgh, with their specific focus on the provision of new homes to create sustainable communities. However, the proposals in this scenario for student accommodation setting a requirement for mixed uses, which M&M believe require to be compatible, especially in single sites. Not all student housing sites can provide a variety of other planning uses and tenure types. However, as part of larger mixed use sites a wide variety of development forms may be able to be accommodated.

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

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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 Whilst the Council's aspiration to build 20,000 affordable homes is noted and considered laudable, the aim to increase the affordable housing requirement to 35% from 25% requires to be carefully considered. Addressing affordability will require subsidised affordable housing, but this should not be seen as the only policy lever necessary to address the issue. The focus requires to be on providing more housing of all tenures. Edinburgh needs to be building more homes of all tenures otherwise, pressures on affordability will continue. If new housing supply continues to be inadequate to satisfy housing need and demand it will continue to place upwards pressure on affordability. Edinburgh has failed to adequately plan to meet the housing need and demand it has itself identified in its own evidence. When housing supply targets were belatedly produced to support SESPlan 1 in November 2014, the 2009-24 target for Edinburgh was just 61% of the figure set out in the Housing Need and Demand Assessment (HNDA, Table 5.1.2). The now abandoned SESPlan 2 only set out to meet 39% of need and demand arising between 2012-30 in Edinburgh. It is unsurprising, though regrettable that this failure to plan to meet need and demand properly appears to be influencing some of the problems which are identified in the Main Issues Report. M&M believe that 25% level of affordable housing should remain for urban brownfield sites, on the basis of viability. They are willing to consider a further 10% affordable housing on greenfield sites raising it to the Council's desired 35% if the new SPP states this is necessary in Edinburgh. However, that will be on a conditional basis, that this additional 10% is not social provision, but discounted/low cost home ownership affordable housing. M&M believe the affordable housing threshold should remain at 25% as detailed in the SPP for brownfield development and support continuity, as detailed in section C. The details for provision of this form of housing is supported, as outlined in part B.

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

Customer Ref: 01694 Response Ref: ANON-KU2U-GW7H-4
Name: Anthony Aitken
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On behalf of: Mactaggart & Mickel LTD

Supporting Info:
Email: anthony.aitken@colliers.com

Choice 12 A

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

Short Response: Option 3 (Blended)

Explanation

There is a recognition by the Council that they need to provide new homes in Edinburgh and allocate land for new homes. M&M are of the view that the Council, in accordance with the provisions of the new Planning Act and forthcoming NPF4 require to meet their housing requirement in full. The last approved South East Scotland (SESPan) Strategic Development Plan (SDP) is dated from 2013 and does not break down housing requirements by local authority area beyond 2024. The evidence base for this MIR is therefore dated. We do concur that under the circumstances, with SESPlan2 being rejected by Scottish Ministers in 2019, it is reasonable that the Edinburgh target is set using the more updated HNDA 2 (2015). M&M support the Council's aim to provide over 20,000 affordable homes to 2032. Choices 2030 sets out two options for a housing target, as follows: 1. Preferred Option: 43,400 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HNDA 2 Wealth Distribution Scenario less completions between 2012 and 2019. 2. Alternative Option: 52,800 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HNDA 2 Wealth Distribution Scenario less completions between 2012 and 2019. Both options fall some way short of meeting housing need and demand in full. The preferred option would meet just 65% of identified need and demand in the HNDA 2 Wealth Distribution Scenario. The alternative option would meet 79% of identified need and demand in the HNDA 2 Wealth Distribution Scenario or 65% of the Strong Economic Growth Scenario. Choices 2030 and the Housing Study do not adequately justify why housing need and demand cannot be met in full. There is a reference to the other factors involved in setting the housing target in SPP (para. 115), but it is not explained in any detail why a downward adjustment from the HNDA output is considered to be justified. This is an important point given the historic severe undersupply of housing and housing land in Edinburgh and merits further significant attention. The alternative target of 52,800 homes is discounted because it is argued that the supporting evidence to the HNDA suggested the Strong Economic Growth Scenarios was unrealistic. However, this evidence was produced in 2013 (Oxford Economics reference) and applied to the whole SESPlan region. M&M do not consider that these conclusions remain relevant to Edinburgh in 2020 or indeed the next decade to 2030. Taking these factors into consideration we consider that the higher Housing Supply Target (HST) of 52,800 between 2019-32 is the most appropriate target. This equates to approximately 79% of the middle HNDA output. The Edinburgh housing market has self-containment in moves of between 81% and 90%. 79% is close to the lower threshold, but the unmet need and demand will need to be met elsewhere. M&M believe that the CEC should review the submissions to the MIR and then seek to ascertain how the land required for the full range of housing provision is met. To outline that land will either be provided by the Council and its partners or through an alternative and unsupported 'market housing led' is a dogmatic approach that does not reflect the collaboration needed, to ensure all housing tenure provision is provided for in full, in Edinburgh, over the next decade. As the nation's capital and an economic powerhouse for the Scottish economy, greater ambition is required by CEC to house its citizens and rising population, obsufication and dereliction of responsibility are no longer acceptable. To deliver new homes in the most sustainable manner, CEC have expressed a preferred option of these being delivered by the Council and its partners within the urban area, a brownfield sites approach. M&M recognise the importance of reusing previously developed land as a key objective of the planning system and have undertaken many developments of this nature themselves. However, when the Council then outline that to meet their preferred housing requirement they

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require 275 Ha of urban land and that only 11 Ha is currently available for development and the remainder is currently in use as employment land, then the credibility and deliverability of their preferred strategy requires to be significantly questioned. This is a route, if followed, that will ensure that there is another decade of under provision of housing within Edinburgh. This is unacceptable. M&M believe that a balanced approach is required with a combination of brownfield and greenfield sites coming forward over the next decade to maximise the prospects of Edinburgh delivering the full range of homes it needs for its residents. To meet the 52,800 (+ 10% generosity margin = approximately 58,000) unit requirement favoured by M&M, this equates to 4,060 units per annum. With a current land supply of just over 30,000 units, historic brownfield completions of 850 per annum, this equates to a further 11,000 homes to 2032, requiring approximately 17,000 homes to be allocated through the release of greenfield land in Edinburgh. M&M believe that this will require deliverable sites from all tenure options to ensure that the housing requirements of the city are met in full. M&M have a strategic short term, under five years, deliverable site at South Gilmerton that can deliver approximately 400-500 units. A greenfield land release site of this nature will provide Edinburgh with the housing it requires and maximise its prospects of meeting its housing demand. The site specific details of this landholding will be covered in further sections of this submission. In summary, M&M do not support Choice A that all new homes are delivered on brownfield sites, solely in the urban area, as this is unrealistic and will fail to provide the homes that require to be delivered in the next decade. Qualified support for a 'blended approach' providing both brownfield and greenfield sites, based on the housing numbers detailed in the preceding paragraphs is the M&M position on this important Choice.

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: Yes

Explanation

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Response Type

On behalf of:

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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Response Type

On behalf of:

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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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Response Type

On behalf of:

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

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Supporting Info

Name

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Response Type

Agent / Consultant

On behalf of:

Mactaggart & Mickel LTD

Choice

12 BX

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

Short Response

Not Answered

Explanation

Choice

12 C

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

Short Response

Yes

Explanation

Choice

12 C

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

Short Response

No

Explanation

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On behalf of:

Choice 12 C

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

Short Response

Explanation

Choice 12 D

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

Short Response

Explanation

Choice 13 A

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

Short Response

Explanation

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Choice **14 A**

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

Short Response

Explanation

Choice **14 B**

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

Short Response

Explanation

Choice **14 C**

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

Short Response

Explanation

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On behalf of:

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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Supporting Info

Name Anthony Aitken

Email anthony.aitken@colliers.com

Response Type Agent / Consultant

On behalf of: Mactaggart & Mickel LTD

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 Not Answered

Explanation Not Answered

Choice 16 A2

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

Short Response Not Answered

Explanation Not Answered

Choice 16 A3

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

Short Response Not Answered

Explanation Not Answered

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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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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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

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

Customer Ref: Response Ref:

Name

Response Type

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

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

Customer Ref: 01694 Response Ref: ANON-KU2U-GW7H-4

Supporting Info

Name Anthony Aitken

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Response Type Agent / Consultant

On behalf of: Mactaggart & Mickel LTD

Choice 16 G

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

Short Response Not Answered

Explanation Not Answered

Choice 16 H

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

Short Response Not Answered

Explanation Not Answered



City of Edinburgh Council Main Issues Report – Choices for City Plan 2030

MARCH 2020

COLLIERS INTERNATIONAL

MACTAGGART & MICKEL LTD

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1 INTRODUCTION

1.1 OVERVIEW

Mactaggart & Mickel Ltd (M&M) welcome the opportunity to comment on the City of Edinburgh Council Main Issues Report (MIR) – Choices for City Plan 2030. The consultation period is open until 30th April 2020.

Mactaggart & Mickel are a Scottish housebuilder with 95 years' experience of designing, constructing and delivering homes in Edinburgh and indeed throughout Scotland. It is with this practical knowledge and experience that Mactaggart & Mickel comment on the MIR for Scotland's Capital City.

A review of the strategic and preferred choices by the City of Edinburgh Council intimated in the published 'Choices for City Plan 2030' will be evaluated and commented upon by Mactaggart & Mickel.

Mactaggart & Mickel are seeking to support and advance a landholding that they control in South Gilmerton, Edinburgh. Site-specific information supporting this location will be provided within the latter part of this submission. A review of the Council's assessment of this landholding in their Housing Study will also be undertaken. Mactaggart & Mickel have successfully secured planning permission (14/01649/PPP) (PPA-230-2137) and a CEC Local Development Plan 2016 allocation for land to the north of Gilmerton Station Road (HSG 24), which is now being developed for residential development. Mactaggart & Mickel have distinct and recent experience of delivering development in this locality.

The aim of the Mactaggart & Mickel submission to the MIR will be to usefully inform and provide the Council with their views, to allow the Local Development Plan for Edinburgh to come forward and provide the new homes required in the city over the next decade. The delivery of new homes in Scotland's Capital City in the 2020's is imperative to the growth of the economy and to ensure that Edinburgh can house its citizens in sustainable locations taking full account of environmental, transport and landscape considerations from the outset.

2 SCOTTISH PLANNING POLICY (SPP)

2.1 CONTEXT

The purpose of the SPP is to set out national planning policies which reflect Scottish Ministers' priorities for operation of the planning system and for the development and use of land. It is non-statutory, but the SPP is a material consideration that carries significant weight.

The SPP focuses on plan making, planning decisions and development design on the Scottish Government's Purpose of creating a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth.

Scottish Ministers expect the planning service to perform to a high standard and to pursue continuous improvement. The service should:

- focus on outcomes, maximising benefits and balancing competing interests;
- play a key role in facilitating sustainable economic growth, particularly the creation of new jobs and the strengthening of economic capacity and resilience within communities;
- be plan-led, with plans being up-to-date and relevant;
- make decisions in a timely, transparent and fair way to provide a supportive business environment and engender public confidence in the system;
- be inclusive, engaging all interests as early and effectively as possible;
- be proportionate, only imposing conditions and obligations where necessary; and
- uphold the law and enforce the terms of decisions made.

For planning to make a positive difference, development plans and new development need to contribute to achieving a successful, sustainable place by supporting sustainable economic growth and regeneration, and the creation of well-designed, sustainable places. The SPP introduces a presumption in favour of development that contributes to sustainable development.

2.2 LOCAL DEVELOPMENT PLANS

The SPP sets out the overall aims of the Development plan which should:

- be consistent with the policies set out in this SPP, including the presumption in favour of development that contributes to sustainable development;
- positively seek opportunities to meet the development needs of the plan area in a way which is flexible enough to adapt to changing circumstances over time;
- 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;
- be up-to-date, place-based and enabling with a spatial strategy that is implemented through policies and proposals; and
- set out a spatial strategy which is both sustainable and deliverable, providing confidence to stakeholders that the outcomes can be achieved.

In developing the spatial strategy, planning authorities should identify the most sustainable locations for longer-term development and, where necessary, review the boundaries of any green belt.

In enabling the delivery of new homes, the planning system should:

- identify a generous supply of land for each housing market area within the plan area to support the achievement of the housing land requirement across all tenures, maintaining at least a 5-year supply of effective housing land at all times;
- enable provision of a range of attractive, well-designed, energy efficient, good quality housing, contributing to the creation of successful and sustainable places; and
- have a sharp focus on the delivery of allocated sites embedded in action programmes, informed by strong engagement with stakeholders.

Plans should be informed by a robust housing need and demand assessment (HNDA). This assessment provides part of the evidence base to inform both local housing strategies and development plans (including the main issues report). It should produce results both at the level of the functional housing market area and at local authority level, and cover all tenures. Plans should address the supply of land for all housing. The housing supply target is a policy view of the number of homes the authority has agreed will be delivered in each housing market area over the periods of the development plan. The target should be reasonable, should properly

reflect the HNDA estimate of housing demand in the market sector, and should be supported by compelling evidence.

Local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. In allocating sites, planning authorities should be confident that land can be brought forward for development within the plan period and that the range of sites allocated will enable the housing supply target to be met.

Mactaggart & Mickel concur with the SPP that Local Development Plans (LDP) should allocate appropriate housing sites to support the creation of sustainable mixed communities, successful places and help to ensure the continued delivery of new housing in Edinburgh.

3 CHOICES FOR CITY PLAN 2030

3.1 CHOICE ONE - EDINBURGH, SUSTAINABLE, ACTIVE AND CONNECTED

A new policy in the forthcoming LDP which takes account of connecting places, parks and greenspaces is supported by Mactaggart & Mickel (M&M) as these contribute to both health and well-being. Encouragement for walking, cycling and sport are generally supported.

In planning for any development, M&M recognise the inclusion of green and blue infrastructure, providing appropriate open space, trees and utilising Sud's for their aquatic/ecological habitats and bio-diversity.

M&M believe that new standards, as alluded to in point E) require to be proportionate and do not all fall on new development proposals to provide. There requires to be a comprehensive audit of existing open space provision throughout the City and only where distinct deficiencies are identified, then a proportionate response is sought via new development, which recognises the proposed use and its impact on green/blue infrastructure.

M&M support parts A and B of the choices offered and qualify any support of part E, as detailed above.

3.2 CHOICE TWO – IMPROVING QUALITY, DENSITY AND ACCESSIBILITY OF DEVELOPMENT

M&M are committed to any development that they undertake in Edinburgh creating a great new place and contributing to existing communities. M&M are proud of their 95 year history of home building in Edinburgh and the legacy this bequeaths as Scottish housebuilders of fine repute and high standards. M&M support a consistent approach to determining applications for new buildings and places, this is considered essential.

Accessibility for their residents is at the forefront of their design/layout, and is evidenced in a supporting design and access statement with a planning application. The further densification of development to a minimum 65 units per hectare is ambitious and M&M question whether this will allow for a full tenure range on a development. Perhaps this standard could be applied to urban brownfield sites with

a range from 50-65 units per Ha in greenfield land releases, in locations, close to public transport and active travel routes. It could be an ambition to get to 65 units per Ha in the future and based on the sites characteristics and context.

M&M will take full account that their developments streets, road layout and sense of place reflects the Street Design Guidance in Edinburgh and meets the SPP six qualities of a successful place, namely;

- Safe
- Pleasant
- Easy to move around
- Welcoming
- Adaptable
- Energy efficient

M&M agree with parts A and C of this Choice. Part B on density needs to be aspirational not compulsory and re-written accordingly, failing which, section E, existing densities should be maintained.

3.3 CHOICE THREE – CARBON NEUTRAL BUILDINGS

M&M recognise that there is a requirement to reduce carbon emissions through both good design and use of low and zero carbon generating technologies. We note the Council's aim for all buildings in Edinburgh to be zero carbon by 2030 and 50% of the carbon reduction target being met through low and zero carbon generating technologies. However, M&M believe that emissions standards for new buildings should continue to sit within the building standards regulatory regime and not the planning system, as this causes needless duplication, when the focus should be on maximising the efficiency of existing planning resource. Therefore, apart from an overall CEC view of seeking to achieve carbon neutral buildings, this should not result in a bespoke planning policy in the LDP.

On this basis B-D inclusive are supported, where these matters remain with Building Control of CEC

3.4 CHOICE FOUR – CREATING PLACE BRIEFS AND SUPPORTING COMMUNITY LOCAL PLACE PLANS

The ambition of CEC to have Place Briefs prepared in conjunction with local communities in all new housing sites is a significant increase in consultation requirements, especially for those sites below 2Ha in size and which are not major applications in the planning hierarchy of development. It is considered that Place Briefs are best suited to strategic sites and that education, transport and infrastructure provision is best led by expert advice and evidence. There also requires to be a leading role for landowners and developers in the preparation of Place Briefs.

The new Planning Act allows for Local Place Plans (LPP) to be prepared by local communities and set proposals for development of land of particular significance to a local area. However, it should also be highlighted that the LPP requires to adhere to the LDP and is not to be used as a tool to thwart allocations or development proposals contained in the LDP.

Therefore qualified support is provided to suggestion A for Place Briefs, if they can take the above comments into account and supporting LPP's as part B, provided they meet with their required parameters.

3.5 CHOICE FIVE – DELIVERING COMMUNITY INFRASTRUCTURE

M&M concur with the CEC view that directing development to where there is existing or under-utilised infrastructure is sensible. If new infrastructure is required, improvements are sought and investment needed, then this requires to be guided by Planning Circular 3/2012 – Planning Obligations and the associated tests, in order for a planning agreement (section 75) to be entered into between a developer and the Council. A developer contribution must be proportionate and directly relevant to the development proposal.

In terms of Healthcare Infrastructure, it is considered that the planning of future health care services is a matter the NHS Lothians, any impacts should be proportionate and clearly defined by the NHS to CEC in preparing the LDP.

A M&M development proposal would take full account of its transport impact and this would be detailed as a supporting report for a planning application on an M&M development site. M&M aim to promote landholdings that are located in sustainable locations where there are nearby walking routes of public transport provision.

In this set of choices, IV support sections A,, B, C, D and E.

3.6 CHOICE SIX – PEOPLE NOT CARS

This is covered by M&M in the preceding section. M&M fully subscribe to creating places for people and not cars, focusing on healthy lives prioritising public transport, walking cycling and reducing levels of private care ownership.

M&M agree with change A, but qualify any support for change B, as detailed in earlier sections of these representations.

3.7 CHOICE SEVEN – REDUCE CAR USE

M&M are committed to utilising good public transport options, supporting walking/cycling, providing access to car clubs, shared mobility, which each provide less need to own a car. Determining car parking levels based on the area of the city and development type are also important considerations. M&M consider that this Choice should be merged with the preceding Choice as there is significant duplication on this subject and a single policy response will be clearer.

Sections A-D inclusive, are supported by M&M.

3.8 CHOICE EIGHT – DELIVERING NEW WALKING/CYCLING ROUTES

The aim to provide new walking and cycling routes is laudable. M&M believe that a review of the entire cycle/footpath network in the city should be undertaken, where deficiencies or improvements can be identified then these should be highlighted. Any request for development to contribute to these should be proportionate and relevant to the development proposal, as well as meeting all the tests of Circular 3/2012.

M&M back parts A and C, with qualified support for B, as outlined in the preceding paragraph.

3.9 CHOICE NINE – PROTECTING AGAINST LOSS OF HOMES

This is a future policy in the forthcoming LDP to tackle matters relative to short term lets in the City and is not a matter that M&M wish to comment on.

3.10 CHOICE TEN - CREATING SUSTAINABLE COMMUNITIES

M&M support the aim to increase the number of new homes in Edinburgh, with their specific focus on the provision of new homes to create sustainable communities. However, the proposals in this scenario for student accommodation setting a requirement for mixed uses, which M&M believe require to be compatible, especially in single sites. Not all student housing sites can provide a variety of other planning uses and tenure types. However, as part of larger mixed use sites a wide variety of development forms may be able to be accommodated.

M&M firm have no view on parts A and B, however, they conditionally support part B for larger sites, as detailed above.

3.11 CHOICE ELEVEN – AFFORDABLE HOUSING

Whilst the Council's aspiration to build 20,000 affordable homes is noted and considered laudable, the aim to increase the affordable housing requirement to 35% from 25% requires to be carefully considered. Addressing affordability will require subsidised affordable housing, but this should not be seen as the only policy lever necessary to address the issue. The focus requires to be on providing more housing of all tenures. Edinburgh needs to be building more homes of all tenures otherwise, pressures on affordability will continue. If new housing supply continues to be inadequate to satisfy housing need and demand it will continue to place upwards pressure on affordability.

Edinburgh has failed to adequately plan to meet the housing need and demand it has itself identified in its own evidence. When housing supply targets were belatedly produced to support SESPlan 1 in November 2014, the 2009-24 target for Edinburgh was just 61% of the figure set out in the Housing Need and Demand Assessment (HNDA, Table 5.1.2). The now abandoned SESPlan 2 only set out to meet 39% of need and demand arising between 2012-30 in Edinburgh.

It is unsurprising, though regrettable that this failure to plan to meet need and demand properly appears to be influencing some of the problems which are identified in the Main Issues Report.

M&M believe that 25% level of affordable housing should remain for urban brownfield sites, on the basis of viability. They are willing to consider a further 10% affordable housing on greenfield sites raising it to the Council's desired 35% if the new SPP states this is necessary in Edinburgh. However, that will be on a conditional basis,

that this additional 10% is not social provision, but discounted/low cost home ownership affordable housing.

M&M believe the affordable housing threshold should remain at 25% as detailed in the SPP for brownfield development and support continuity, as detailed in section C. The details for provision of this form of housing is supported, as outlined in part B.

3.12 CHOICE TWELVE – BUILDING NEW HOMES AND INFRASTRUCTURE

There is a recognition by the Council that they need to provide new homes in Edinburgh and allocate land for new homes. M&M are of the view that the Council, in accordance with the provisions of the new Planning Act and forthcoming NPF4 require to meet their housing requirement in full.

The last approved South East Scotland (SESPlan) Strategic Development Plan (SDP) is dated from 2013 and does not break down housing requirements by local authority area beyond 2024. The evidence base for this MIR is therefore dated. We do concur that under the circumstances, with SESPlan2 being rejected by Scottish Ministers in 2019, it is reasonable that the Edinburgh target is set using the more updated HNDA 2 (2015).

M&M support the Council's aim to provide over 20,000 affordable homes to 2032.

Choices 2030 sets out two options for a housing target, as follows:

1. Preferred Option: 43,400 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HMDA 2 Wealth Distribution Scenario less completions between 2012 and 2019.
2. Alternative Option: 52,800 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HMDA 2 Wealth Distribution Scenario less completions between 2012 and 2019.

Both options fall some way short of meeting housing need and demand in full. The preferred option would meet just 65% of identified need and demand in the HNDA 2 Wealth Distribution Scenario. The alternative option would meet 79% of identified need and demand in the HNDA 2 Wealth Distribution Scenario or 65% of the Strong Economic Growth Scenario.

Choices 2030 and the Housing Study do not adequately justify why housing need and demand cannot be met in full. There is a reference to the other factors involved in setting the housing target in SPP (para. 115), but it is not explained in any detail why a downward adjustment from the HNDA output is considered to be justified. This

is an important point given the historic severe undersupply of housing and housing land in Edinburgh and merits further significant attention.

The alternative target of 52,800 homes is discounted because it is argued that the supporting evidence to the HNDA suggested the Strong Economic Growth Scenarios was unrealistic. However, this evidence was produced in 2013 (Oxford Economics reference) and applied to the whole SESPlan region. M&M do not consider that these conclusions remain relevant to Edinburgh in 2020 or indeed the next decade to 2030.

Taking these factors into consideration we consider that the higher Housing Supply Target (HST) of 52,800 between 2019-32 is the most appropriate target. This equates to approximately 79% of the middle HNDA output. The Edinburgh housing market has self-containment in moves of between 81% and 90%. 79% is close to the lower threshold, but the unmet need and demand will need to be met elsewhere.

M&M believe that the CEC should review the submissions to the MIR and then seek to ascertain how the land required for the full range of housing provision is met. To outline that land will either be provided by the Council and its partners or through an alternative and unsupported 'market housing led' is a dogmatic approach that does not reflect the collaboration needed, to ensure all housing tenure provision is provided for in full, in Edinburgh, over the next decade. As the nation's capital and an economic powerhouse for the Scottish economy, greater ambition is required by CEC to house its citizens and rising population, obsufication and dereliction of responsibility are no longer acceptable.

To deliver new homes in the most sustainable manner, CEC have expressed a preferred option of these being delivered by the Council and its partners within the urban area, a brownfield sites approach. M&M recognise the importance of reusing previously developed land as a key objective of the planning system and have undertaken many developments of this nature themselves. However, when the Council then outline that to meet their preferred housing requirement they require 275 Ha of urban land and that only 11 Ha is currently available for development and the remainder is currently in use as employment land, then the credibility and deliverability of their preferred strategy requires to be significantly questioned. This is a route, if followed, that will ensure that there is another decade of under provision of housing within Edinburgh. This is unacceptable.

M&M believe that a balanced approach is required with a combination of brownfield and greenfield sites coming forward over the next decade to maximise the prospects of Edinburgh delivering the full range of homes it needs for its residents.

To meet the 52,800 (+ 10% generosity margin = approximately 58,000) unit requirement favoured by M&M, this equates to 4,060 units per annum. With a current land supply of just over 30,000 units, historic brownfield completions of 850 per annum, this equates to a further 11,000 homes to 2032, requiring approximately 17,000 homes to be allocated through the release of greenfield land in Edinburgh.

M&M believe that this will require deliverable sites from all tenure options to ensure that the housing requirements of the city are met in full. M&M have a strategic short term, under five years, deliverable site at South Gilmerton that can deliver approximately 400-500 units. A greenfield land release site of this nature will provide Edinburgh with the housing it requires and maximise its prospects of meeting its housing demand. The site specific details of this landholding will be covered in further sections of this submission.

In summary, M&M do not support Choice A that all new homes are delivered on brownfield sites, solely in the urban area, as this is unrealistic and will fail to provide the homes that require to be delivered in the next decade. Qualified support for a 'blended approach' providing both brownfield and greenfield sites, based on the housing numbers detailed in the preceding paragraphs is the M&M position on this important Choice.

3.13 CHOICE THIRTEEN – INNOVATION, UNIVERSITIES AND CULTURE

A policy provision in the LDP that supports social enterprises, start up's, culture, tourism, innovation, learning and a low carbon sector are supported by M&M, as these enhance the City.

M&M support change A

3.14 CHOICE FOURTEEN – DELIVERING WEST EDINBURGH

It is recognised that the area in and around Edinburgh Airport is identified as nationally significant in economic and transport terms, there are strategic land allocations from the current LDP 2016 for growth in this area. There are proposals to build on these allocations through this next LDP and M&M believe that a balance is required between the west and south east of the city.

M&M have no preference concerning this Choice.

3.15 CHOICE FIFTEEN – PROTECTING CITY, TOWN AND LOCAL CENTRES

Edinburgh fortunately benefits from a healthy range of local, town and thriving city centre. M&M support the policy option to seek to strengthen local and town centres, as these are often in sustainable locations with good transport connections that provide a range of goods, services and community facilities. It is considered important that they maintain their vitality, viability and deliver good placemaking.

M&M support parts A-D inclusive of this Choice.

3.16 CHOICE SIXTEEN – DELIVERING OFFICE, BUSINESS AND INDUSTRIAL FLOORSPACE

M&M have no comments to offer in this section.

4 SOUTH OF GILMERTON STATION ROAD

4.1 BACKGROUND

Mactaggart and Mickel (M&M) control a landholding south of Gilmerton Station Road, which they consider appropriate for allocation for residential development in the next Local Development Plan.

In the last City of Edinburgh Council Local Development Plan of 2016, M&M secured the greenfield, green belt housing land release at Gilmerton Station Road (HSG 24). At present this site is being developed for housing with Miller Homes, Barratt Homes and Persimmon Homes all currently developing their phases at this site. It will also provide 25% affordable housing, which is also being provided at present. Land is also set aside for a new primary school as part of this allocation. M&M have a distinct and successful track record of providing new homes in this locality in the recent past, at present and in the immediate future.

The site under the control of M&M is the greenfield undeveloped agricultural land which extends to approximately 30Ha (75 acres) south of Gilmerton Station Road. There is also an industrial and scrapyards area (Bernard Hunter) that secured planning permission (19/02122/PPP) in November 2019 from CEC for Gilmerton Gateway, a retail, professional services, food/drink, business, industrial, hotel and leisure mixed use proposal.

The landholding under the control of M&M south of Gilmerton Station Road is available now, in the short term for the provision of a landscape-led and locally appropriate residential development within the city boundary of Edinburgh.

The south of Gilmerton Station Road is situated within South East Edinburgh, approximately 4.5 miles from Edinburgh City Centre and adjacent and immediately north of the City Bypass (A720).

4.2 SITE PROMOTION HISTORY

Mactaggart and Mickel have not promoted this landholding for development before. As detailed above they focused previously on the landholding to the north of Gilmerton Station Road and secured an allocation (HSG 24) in the CEC LDP 2016.

4.3 PROSPECTIVE SITE CONTEXT

Mactaggart and Mickel control the undeveloped agricultural land to the south of Gilmerton Station Road, which extends to approximately 30Ha (75 acres).

The site currently comprises arable farmland and sits within the statutory Green Belt. There are overhead power lines that traverse the site.

Mactaggart and Mickel would undertake a landscape led masterplan for the future development of this landholding, upon allocation. This work would provide a comprehensive appraisal of the site, its currently changing context and develop an initial conceptual framework, outlining the development footprint of the development and the means via which this can be provided to follow sound placemaking principles.

4.4 SITE ANALYSIS

The site comprises an area of land referred to as 'South of Gilmerton Station Road' Edinburgh, as assessed by CEC in their Housing Land Study 2020.

The Greenfield Site Assessment (Part 2b) concluded that the wider area 'South of Gilmerton Station Road' is suitable for development principally for the following reasons:

- Recent and continuing development changing the character of the local area
- Its strategic location as part of south east Edinburgh
- Lack of infrastructure constraints
- Ability to address site specific considerations

However, notwithstanding the above overall analysis and conclusion, under the specific assessment criteria detailed below, the site scored poorly in terms of;

- access to employment clusters
- active travel opportunities
- access to public transport
- school capacity
- impacts on surrounding landscape character

Mactaggart & Mickel wish to review a number of these comments in light of the changing character of this area. Red means the matter makes the site unsuitable for

development 'No', yellow 'Partial' suitable for development and green 'Yes' acceptable for development.

The land south of Gilmerton Station Road is in the fifth row of the table below, which considers a range of sites in south east Edinburgh.

Sector 2 - South East SDA

AREA NAME	SDP1 Strategic Development Areas	10 min walk to local convenience services	10 min walk to employment clusters	Access to wider cycle network	Active travel assessment (overall)	Access to existing public transport	Public transport assessment (overall)	Primary school capacity	Secondary school capacity	Community infrastructure assessment (overall)	Landscape character assessment	Green network assessment	Flood risk assessment	SUMMARY
West of Liberton Drive	Yellow	Green	Green	Red	Red	Yellow	Red	Red	Red	Red	Red	Red	Red	Red
South of Liberton Drive	Yellow	Green	Green	Red	Red	Yellow	Red	Red	Red	Red	Red	Red	Red	Red
South of Prosgill Road East	Yellow	Green	Green	Red	Red	Yellow	Red	Red	Red	Red	Red	Red	Red	Red
South of Lang Loan	Yellow	Green	Green	Red	Red	Yellow	Red	Red	Red	Red	Red	Red	Red	Red
South of Gilmerton Station Road	Yellow	Green	Green	Red	Red	Yellow	Red	Red	Red	Red	Red	Red	Red	Red
South East Wedge Parkland	Yellow	Green	Green	Red	Red	Yellow	Red	Red	Red	Red	Red	Red	Red	Red
Liberton Golf Course	Yellow	Green	Green	Red	Red	Yellow	Red	Red	Red	Red	Red	Red	Red	Red
Crailmillie Castle Park	Yellow	Green	Green	Red	Red	Yellow	Red	Red	Red	Red	Red	Red	Red	Red
City South	Yellow	Green	Green	Red	Red	Yellow	Red	Red	Red	Red	Red	Red	Red	Red
City North	Yellow	Green	Green	Red	Red	Yellow	Red	Red	Red	Red	Red	Red	Red	Red
Westerhall Cemetery and Crematorium	Yellow	Green	Green	Red	Red	Yellow	Red	Red	Red	Red	Red	Red	Red	Red
East of Burdhouse Road	Yellow	Green	Green	Red	Red	Yellow	Red	Red	Red	Red	Red	Red	Red	Red

Each of the Greenfield Sites assessment criteria for which the site scored yellow or red will be addressed in turn.

4.4.1 ACTIVE TRAVEL

ACTIVE TRAVEL	
Does the site support travel by foot to identified convenience services?	Partially – The site is not within walking distance to local convenience services. Convenience services can be provided on the site due to scope for development here and nearby.
Does the site support travel by foot to identified employment clusters?	No – The site is not within walking distance to employment clusters. It is unlikely that access can be improved and employment clusters are unlikely to be provided on the site due to lack of scope for employment development nearby. A town centre and designated employment site and in Shawfair, Midlothian is within walking distance and currently being developed but this may not have a sufficient density of employment.
Does the site have access to the wider cycle network?	Partially – The site does not have access to the wider cycle network but access could be improved by a planned cycle corridor improvement connecting the South East to the wider network via Old Dalkeith Road and the Bioquarter, which this site could connect to through masterplanning and additional intervention via an existing cycle path adjacent to the site which does not yet connect to the wider network. This existing cycle path running adjacent to the site will connect with a planned town centre and employment site in Shawfair, Midlothian.
Can the site support active travel overall through appropriate intervention?	No – The site would not support active travel overall, as the site is not within walking distance of employment clusters, although employment land is designated and under development in Shawfair, Midlothian which is close to the site. Convenience services could be provided alongside development. Access to the wider cycle network can be improved through delivery of and connection to the identified South East cycle corridor improvements.

In terms of active travel there are a number of criteria to be assessed for this landholding. As outlined in the introductory section, a full range of convenience services received planning approval at the end of 2019 at the adjoining Gilmerton Gateway. This will provide a number of services in the future, immediately accessible by foot. However, recognising that these have still to be developed and that future provision will be provided, yellow 'Partial' is a fair assessment at present.

In terms of travel by foot to identified employment clusters, the site scores a red 'no'. Again, when assessing the recent planning approval for the adjoining Gilmerton Gateway, this included provision for a range of employment sources including business, industrial, retail and professional services. Coupled with the potential provision of new nearby school and the fact that this allocation is within walking distance to employment uses at Shawfair, it is considered by M&M that there are a potential range of future employment uses within walking distance of this site. In the same way that in the preceding assessment future provision allowed for a yellow 'Partial' score, M&M believe that a similar and consistent assessment should be reflected here as well. Therefore M&M believe that the red should be changed to yellow 'Partial' in this instance.

With regard to access to the wider cycle network, the site scores a yellow 'Partial'. There is a plan for cycle corridor improvement along Gilmerton Station Road connecting this part of Edinburgh to Edinburgh Bio-quarter and city centre along the A7. Therefore, the scoring via a yellow 'Partial' is fair based on what is currently accessible, but it is considered that by the time this site starts to be developed that this can change to a green 'Yes'.

It is outlined as a red 'No' that the site cannot support active travel overall through appropriate intervention. M&M do not concur with this assessment as the site will in future be within walking distance to a range of new employment sources, as well as Shawfair, which has a number of existing employment sources, Scottish Qualifications Authority/Spire Healthcare etc. As outlined previously, the cycle network is in place adjoining the site and is scheduled for improvement via the developments currently being undertaken. Therefore, overall M&M believe that the site should score an overall yellow 'Partial' in view of what is accessible and in place currently, along with forthcoming and planned improvements.

4.4.2 PUBLIC TRANSPORT

PUBLIC TRANSPORT	
<i>Does the site support travel by public transport through existing public transport network accessibility and capacity?</i>	<p>No – The site does not support travel by public transport based on existing or incrementally improved provision.</p>
<i>Is the site potentially served by an identified public transport intervention project which is deliverable in the plan period to serve and accommodate development?</i>	<p>Partially – The site has limited support for travel by public transport based on an identified major intervention deliverable within the plan period.</p> <p>This intervention would serve the wider south-east corridor of the city along Old Dalkeith Road and improve accessibility from this area. Although the site is over 1km from Old Dalkeith Road where this intervention is likely to be focused, connections to the corridor could be improved through masterplanning of this and nearby sites and making use of the existing cycle path passing alongside the site and leading to the appropriate area.</p>

The CEC assessment considers that the site does not support travel by public transport based on existing or incremental improved provision. There is at present bus stops – Gilmerton Station Road, on either side of the A722 that forms that eastern boundary of the site. There is a healthy level of service with the No 3 – Horsburgh service that passes the site connecting Mayfield to Edinburgh. The Lothian buses 29 service connecting the site to Gorebridge and Edinburgh City Centre. There is also an X40 that passes the site to Edinburgh Royal Infirmary at Little France, a major employment source. It is considered that at least half of the entire south of Gilmerton Station Road landholding is within 400m of these bus stops, a 5-10 walk and almost the entire landholding will be within 800m. On this basis M&M believe that the CEC assessment is inaccurate and that this red ‘No’ should be changed to green ‘Yes’, based on the evidence outlined above. M&M secured planning permission for the landholding to the immediate north of Gilmerton Station Road, on the above basis and its was considered accessible to public transport in its assessment and ultimately planning approval/allocation.

With regard to the site being served by an identified public transport intervention, Old Dalkeith Road, 1km away has a planned intervention, future provision of Edinburgh Trams. Access to this corridor can be improved and taken into account at the Masterplanning stage. On this basis the yellow ‘Partial’ is agreed by M&M.

4.4.3 COMMUNITY INFRASTRUCTURE

COMMUNITY INFRASTRUCTURE	
<i>Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?</i>	No – The site does not have sufficient primary school infrastructure capacity.
<i>Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?</i>	No – The site does not have sufficient secondary school infrastructure capacity.
<i>If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?</i>	Partially – The site does not have sufficient community infrastructure capacity to support development and no appropriate intervention has been identified to address this. Although capacity at the due to be delivered Gilmerton Station Road primary school could be increased, a new primary school would be required. A new secondary school would be required. The Council’s preference is to deliver new secondary schools with a capacity for 1200 pupils but this would require significant new housing development in the area to generate this number of pupils. A new secondary school would have to serve a wide catchment area so good active travel and transport links would be important. The level of development proposed here and in adjacent sites would require 2-3 new primary schools and a new secondary school.
LANDSCAPE CHARACTER	

The site scored poorly against the criteria for primary and secondary school provision.

The Council are required to identify a housing strategy to deliver the housing need over the Plan period. Accordingly, the Council should be reviewing their education infrastructure in tandem and we therefore consider that the current reasoning for the red score is unjustified. We disagree with the Council’s view that the site cannot be developed due to a lack of capacity at existing primary and secondary schools. Proportionate developer contributions for education infrastructure would be secured through a Section 75 legal agreement upon grant of planning permission to ensure that the educational needs of future residents are sufficiently addressed.

This assessment gives limited reference to the new primary school being provided to the immediate north of this site, within the current M&M development. On this basis it is considered that the educational analysis as red ‘No’ should minimally be changed to yellow ‘partial’ this will reflect the intervention potential referred to and which is also yellow ‘partial’. The level of educational infrastructure sought does appear to be substantial and it is suggested that this requires rigorous scrutiny and further assessment. Community infrastructure is available in Gilmerton, a library and community facility is located at the Crossroads, which is a short walk/cycle away and forms part of this overall community.

4.4.4 LANDSCAPE CHARACTER

LANDSCAPE CHARACTER	
<i>Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?</i>	No – No scope for development has been identified on this site due to its topography, visibility from the City of Edinburgh Bypass resulting in any development being visibly intrusive, and position south of Gilmerton Station Road/former railway line which forms an effective settlement edge. Overhead power lines form a constraint to development here.

In terms of the landscape assessment the site score a red ‘No’, due to its topography and visibility from the Edinburgh Bypass. However, M&M believe that this can be mitigated against with structural planting to reduce the views to/from this main arterial route, A720 around the southern limit of the city. This has been achieved successfully in other part of southern Edinburgh, at nearby Swanston/Fairmilehead, where residential development immediately adjoins the Edinburgh Bypass and is only partially seen. M&M concur that the overhead power lines present a potential constraint, but one that a masterplan can seek to address. Overall it is considered that with careful analysis that this assessment should be yellow ‘Partial’, as the matters raised can be addressed.

4.4.5 GREEN NETWORK & FLOODING

GREEN NETWORK	
<i>Would development of the site avoid significant loss of landscape-scale land identified as being of existing or potential value for the strategic green network?</i>	Partially – The site may be considered of value for the strategic green network, due to lying within an area identified as a green network opportunity in Edinburgh itself and adjacent to the City of Edinburgh Bypass. Strategic green network enhancements should be delivered alongside development here, and there is opportunity to link to the Drum Estate in the nearby Drum North assessment site.
FLOOD RISK	
<i>Would development of the site avoid identified areas of ‘medium-high flood risk’ (fluvial) or areas of importance for flood management?</i>	Yes – The site has no SEPA-identified areas of medium-high flood risk/for flood management.
SUMMARY COMMENTS	

It is not considered that the landscape scale of this landholding is of particularly high value in this location, adjoining the Edinburgh Bypass and that improved connectivity and a landscape led Masterplan can provide an improved and accessible green network. It can also review what is being undertaken at the nearby Drum Estate and Drum North and seek to consider the wider linkages, via the green network to these land releases as well. M&M successfully achieved this in their nearby development to the immediate north and the housing land release at the Drum Estate in the last LDP. Overall the yellow ‘Partial’ is considered to be a fair analysis at present.

The site has no flood issues and is recorded as a green ‘Yes’ based on the high level SEPA analysis. Again, based on the M&M experience to the immediate north, there

were no flood or drainage impediments to the development proceeding in that instance. A similar experience would be anticipated at this site.

4.4.6 SITE ANALYSIS CONCLUSIONS

M&M concur with CEC that this site is suitable for greenfield housing land release in the forthcoming LDP.

They believe that the site scores better than the initial analysis by CEC when up to date considerations are also factored in as outlined below.

The M&M site specific scoring can be concluded as follows:

Assessment Criteria	Land south of Gilmerton Station Road
SDP1 Strategic Development Areas	Green
10 minute walk to local convenience services	Yellow
30 minute walk to employment clusters	Yellow
Access to wider cycle network	Yellow
Access to existing public transport	Green
Public transport assessment overall	Yellow
Primary School capacity	Yellow
Secondary School capacity	Yellow
Community Infrastructure Assessment overall	Yellow
Landscape character assessment	Yellow
Green Network Assessment	Yellow
Flood Risk Assessment	Green
Summary	Yellow and Green

The site scores well against the assessment criteria and is therefore a suitable future housing allocation in the LDP. It is considered that a number of the yellow 'Partial' scores above will change to green 'Yes' assessments. The important point is that in the view of M&M there are no red 'No' assessment categories.

On this basis it is respectfully requested that a balanced approach to delivering housing is undertaken in the forthcoming LDP with both brownfield and greenfield land release supported. The latter is a suitable greenfield housing land release with a housebuilder experienced and with a track record in delivering housing in this local area. A specific allocation for land south of Gilmerton Station Road should be included in the new LDP.



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