

Customer Ref: 01690      Response Ref: ANON-KU2U-GWJ1-Z  
Name: Montagu Evans LLP  
Response Type: Agent / Consultant  
On behalf of: Mapeley STEPS Limited

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

Choice 1 A

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

Short Response: Not Answered

Explanation: Not Answered

Choice 1 B

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

Short Response: Not Answered

Explanation: Not Answered

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Choice 1 C

We want to identify areas that can be used for future water management to enable adaptation to climate change. Do you agree with this? - Yes / No

Short Response Not Answered

Explanation Not Answered

Choice 1 D

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

Short Response Not Answered

Explanation Not Answered

Choice 1 E

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

Short Response Not Answered

Explanation Not Answered

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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

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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: Yes

**Explanation**  
Choice 2 states that the Council may revise their approach to development density in City Plan 2030 to ensure that the limited space available to develop in Edinburgh is used as efficiently as possible, with the under-development of sites avoided. Our clients are supportive of this choice but would suggest that increasing the density of all development relative to a proposals surroundings would be a more positive step to ensuring that the scarce number of development sites in Edinburgh's urban areas are maximised and support the efficient use of land. Choice 2 also states that the Council want to revise their design and layout policies to achieve better layouts for active travel and connectivity. Our client would agree that places need to follow the six qualities of successful places in Scottish Planning Policy in that they are safe and pleasant, easy to move around, are welcoming; adaptable, and are resource efficient. The proposed site could easily and effectively link into existing active travel routes providing good connectivity into the rest of the City.

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: Not Answered

**Explanation**

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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: Not Answered

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: Not Answered

Explanation: Not Answered

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: Not Answered

Explanation: Not Answered

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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

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

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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

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



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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

Choice **6 B**

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

Short Response

Explanation

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Choice **7 A**

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

Short Response

Explanation

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

Choice **8 B**

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

Short Response

Explanation

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Choice 8 C

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

Short Response

Explanation

Choice 8 C

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

Short Response

Explanation

Choice 9 A

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

Short Response

Explanation

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Choice **9 B**

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

Short Response

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

If the Council choose to implement this, there is a risk that the policy option could create a monopoly over PBSA in the city, which could reduce competition between operators, adversely impact on pricing, and divert future investment away from Edinburgh.

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Choice **10 B**

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

Short Response

**Explanation** Choice 10 also proposes that new purpose built student accommodation will require to deliver market and affordable housing as part of the mix. One of the options for this policy is for any development of 0.25hectares or over for student housing, hotels, retail and leisure developments, at least 50% of the site should be provided for housing. Whilst our client acknowledges and supports a mix of uses at Grayfield House (including residential), it is submitted that the mix should be market driven, with each site being assessed on their individual merits.

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Choice 10 C

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

Short Response: Not Answered

**Explanation**

Choice 10 proposes that a new policy is introduced to ensure the better use of single use out of centre retail units and commercial centres, where their redevelopment for mixed use including housing would be supported. No mention is made of considering existing business and industrial estates as part of this proposal. Whilst it is unlikely in most circumstances that considering alternative uses within business and industrial estates, would be appropriate, there is the possibility for some alternative uses being able to successfully operate from business and industrial locations. If the City of Edinburgh Council are looking for alternative locations to accommodate this mix of uses, it might not just be commercial centres and out of centre retail units, that could provide for this, and it is submitted that every individual location should be assessed on its own merits. It is understood that the protection of the existing business and industrial estates is important to enable them to provide the types of development that are only acceptable within these areas. However, the site at Grayfield House is a large contained site of 7.5 acres that could accommodate a range of uses outwith Classes 4, 5 and 6, with negligible impact upon the operation of the surrounding uses. The site has good access potential with two existing accesses, and the ability to have access from the four boundary roads that are located on each side. The site has the ability to provide for split level multi use high density development. There are a number of uses that would be appropriate within the current business and industrial allocation, such as employment led office developments, trade counter units, storage and distribution units, and our client is supportive of these uses within the area and on the site. However, it is also submitted that there are a range of uses that would also be appropriate, and this should not be disregarded on the basis of the business and industrial allocation. These could include (but not exclusively), provision for nearby education establishments, leisure uses, student accommodation, build to rent and residential. It is noted within the Choices Paper (Choice 10), that is a requirement for additional housing land to meet the long term future needs of the City. It submitted that there should be greater flexibility for the redevelopment of large, well located sites such as Grayfield House to be redeveloped for the uses that are required within Edinburgh, such as residential. Whilst it might be a long term aspiration, and other sites nearby may also be able to contribute towards the housing shortage, it is submitted that the policies imposed under the business and industrial use, should be more flexible to allow sites such as this to be considered for much needed urban housing. It is noted that further greenfield land is an option for new residential allocations. It is considered by our client, that existing urban brownfield sites with excellent integrated public transport links are better suited towards providing for this housing need, when compared with greenfield land.

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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** Within the Choices Paper, CEC are considering amending their policy to increase the provision of affordable housing requirement from 25% to 35%.All development, including conversions, which consist of 12 residential units or more must include provision for affordable housing amounting to 35% of the total units. This policy will also apply to all land coming forward for other uses (as set out in Choice 10) i.e. where a site is required to deliver at least 50% housing, at least 35% of this housing must also be affordable. CEC wish City Plan 2030 to require a mix of housing types and tenures. There is concern over the increasing of this affordable housing requirement in viability terms. It is submitted that affordable housing at this level should be assessed as part of a case-by-case basis, in order to understand the viability of the overall development. If it is to be implemented we would encourage greater flexibility around tenure and models / definitions of affordable housing product.

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**



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Choice 12 A

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

Short Response: Option 1 (Council/

**Explanation**  
It is recognised within the Choices Paper that there is a need to provide new homes for Edinburgh and additional land requires to be allocated for this. Choice 12 provides three options on how and where City Plan 2030 will deliver new homes; 1) delivery by the council and its partners within the Urban Area (17,600 units within the urban area, 2) delivery through market housing by releasing Greenfield land, (27,900 units on greenfield land) or 3) a blended approach, (a mix of the urban area land 11,000 units, and greenfield land 6,600 units). CECs preference is for new homes to be delivered by the Council and its partners within the Urban Area. Our clients would agree with this approach. The Urban Area contains many brownfield sites which are primed for redevelopment, particularly for residential development. Given the requirement for land to come forward to residential development, it is submitted that brownfield sites such as Grayfield House, with existing infrastructure in place, and links to public transport, should be considered before greenfield release. It is submitted that Option 2 and the delivery of market housing through only greenfield land should not be considered against the development of brownfield land with existing infrastructure and connectivity in place. Our client agrees with the Council's preferred option of residential led mixed use development within the urban area.

Choice 12 B1

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

Short Response: Not Answered

Explanation

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Email

Choice **12 B2**

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

Short Response

Explanation

Choice **12 B3**

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

Short Response

Explanation

Choice **12 B4**

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

Short Response

Explanation

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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 Not Answered

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 Not Answered

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 Not Answered

Explanation

Customer Ref:  Response Ref:

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Choice **12 B8**

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

Short Response

Explanation

Choice **12 B9**

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

Short Response

Explanation

Choice **12 B10**

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

Short Response

Explanation

Customer Ref:  Response Ref:

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Name

Email

Response Type

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Choice **12 BX**

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

Short Response

Explanation

Choice **12 C**

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

Short Response

Explanation

Choice **12 C**

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

Short Response

Explanation

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Response Type

On behalf of:

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

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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: Not Answered

Explanation

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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: I support no change

**Explanation**  
Choice 16 relates to supporting the office market within Edinburgh city centre and in other suitable locations across the City. As part of this support, it is proposed 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 uses, 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 it may only be imposed in the city centre. Our client understands the Council's desire to protect office floorspace within the City. However, it is considered that in some circumstances the introduction of a loss of office policy that restricts the loss of office development, or requires office development to be built as part of the redevelopment, may not be appropriate in all cases. It is considered that the retention of an office space has to be weighed against the characteristics of the specific building in question, the quality of the office accommodation offered along with the location of the development. The demand for a particular office space is determined by a number of factors which can include the cost of the office space and the accessibility of its location. The office building itself is also a significant demand factor for reasons of IT efficiency, productivity and the working environment a company is looking for in relation to its culture. The office accommodation at Grayfield House is in a location amongst a range of other uses, and very few of them are Class 4 office buildings. The mechanical and electrical systems are well past their natural lifespan and are not considered acceptable for future use. The heating system is inefficient and not sustainable. The floor to ceiling heights of the building are a major challenge for modern office occupiers, who would struggle to run data and telecommunications cabling around the space. Furthermore the floor plates of the building would be difficult to remodel to achieve an open-plan working environment, which is favoured by modern office occupiers. In these circumstances, an alternative use requires to be considered in order to allow the modernisation and redevelopment of the building or site. As such, it is considered that if a policy were introduced by CEC that protected the loss of all office floorspace within the City, then dated office developments, such as Grayfield House would likely remain vacant in the market instead of being redeveloped and sustained for future years. It is submitted that if CEC consider that a loss of office floorspace policy is required, there should be an exception for offices that are no longer fit for purpose and that these can be redeveloped as the market demands.

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Choice 16 E1

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

Short Response

Explanation

Choice 16 E2

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

Short Response

Explanation

Choice 16 E3

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

Short Response

Explanation

Customer Ref:  Response Ref:   
Name   
Response Type   
On behalf of:

Supporting Info

Email

Choice 16 E4

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

Short Response

Explanation

Choice 16 E5

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

Short Response

Explanation

Choice 16 E6

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

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 16 E7

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

Short Response

Explanation

Choice 16 E8

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

Short Response

Explanation

Choice 16 EX

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

Short Response

Explanation



Customer Ref: 01690      Response Ref: ANON-KU2U-GWJ1-Z  
Name: Montagu Evans LLP  
Response Type: Agent / Consultant  
On behalf of: Mapeley STEPS Limited

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

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: Not Answered

Explanation: Not Answered

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

**Customer Ref:** 01690      **Response Ref:** ANON-KU2U-GWJ1-Z

**Name** Montagu Evans LLP

**Response Type** Agent / Consultant

**On behalf of:** Mapeley STEPS Limited

**Supporting Info** Yes

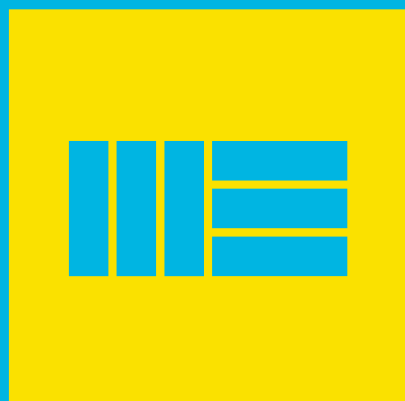
**Email** ally.campbell@montagu-evans.co.uk

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# CHOICES FOR CITY PLAN 2030

**REPRESENTATION** ON BEHALF OF  
**MAPELEY STEPS LIMITED**

APRIL 2020



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# 01 INTRODUCTION

1.1 Montagu Evans LLP act on behalf of Mapeley STEPS Limited who have interest in a site at Grayfield House, 5 Bankhead Avenue, Edinburgh. The site is 7.5 acres.

## **LOCAL DEVELOPMENT PLAN REVIEW**

1.2 The City of Edinburgh Council (CEC) have started the process of reviewing the current Edinburgh Local Development Plan (LDP), which was adopted by the Council in November 2016.

1.3 The first stage of the review is the production of a Main Issues Report (MIR). 'Choices for City Plan 2030' was published by the Council on 31 January 2020. The MIR sets out the Council's broad aspiration's that by 2030 Edinburgh will be:-

- *"A sustainable city which supports everyone's physical and mental wellbeing;*
- *A city where you don't need to own a car to move around;*
- *A city in which everyone lives in a home they can afford; and*
- *A city where everyone shares in its economic success".*

1.4 These aspirations are supported by 16 proposed policy changes.

1.5 The MIR is currently subject to a period of public consultation that will run until 30 April 2020.

1.6 As a key stakeholder within Edinburgh, Mapeley STEPS Limited welcomes the opportunity to respond to the MIR.

# 02 REPRESENTATION

- 2.1 As a key stakeholder in Edinburgh, Mapeley STEPS Limited welcome the opportunity to respond to the Choices for City Plan 2030.
- 2.2 Grayfield House is allocated within a business and industrial park, where classes 4, 5 and 6 are considered to be acceptable under the current Local Development Plan. It is currently a Class 4 office use.
- 2.3 Within the boundaries of the allocation, are predominantly Classes 4, 5 and 6 uses, along with a high percentage of car showrooms. Most recently a Class 11 leisure use has been approved within the area, which currently operates as a children's soft play venue.
- 2.4 Development of student accommodation for Edinburgh University and a Sports and Fitness Centre is located nearby and immediately east of the business and industrial park. Further residential development is located within the area, along with small local retail development and education establishments.
- 2.5 Mapeley STEPS Limited consider that the following choices are most relevant to them with regards to the Choices Paper, and that if implemented, could have the greatest impact on their interest at Grayfield House, Bankhead Avenue.

## **CHOICE 2 – IMPROVING, THE QUALITY, DENSITY AND ACCESSIBILITY OF DEVELOPMENT**

- 2.6 Choice 2 states that the Council may revise their approach to development density in City Plan 2030 to ensure that the limited space available to develop in Edinburgh is used as efficiently as possible, with the under-development of sites avoided.
- 2.7 Our clients are supportive of this choice but would suggest that increasing the density of all development relative to a proposals surroundings would be a more positive step to ensuring that the scarce number of development sites in Edinburgh's urban areas are maximised and support the efficient use of land.
- 2.8 Choice 2 also states that the Council want to revise their design and layout policies to achieve better layouts for active travel and connectivity. Our client would agree that places need to follow the six qualities of successful places in Scottish Planning Policy in that they are safe and pleasant, easy to move around, are welcoming; adaptable, and are resource efficient. The proposed site could easily and effectively link into existing active travel routes providing good connectivity into the rest of the City.

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

- 2.9 Choice 10 proposes that a new policy is introduced to ensure the better use of single use out of centre retail units and commercial centres, where their redevelopment for mixed use including housing would be supported. No mention is made of considering existing business and industrial estates as part of this proposal. Whilst it is unlikely in most circumstances that considering alternative uses within business and industrial estates, would be appropriate, there is the possibility for some alternative uses being able to successfully operate from business and industrial locations. If the City of Edinburgh Council are looking for alternative locations to accommodate this mix of uses, it might not just be commercial centres and out of centre retail units, that could provide for this, and it is submitted that every individual location should be assessed on its own merits.
- 2.10 It is understood that the protection of the existing business and industrial estates is important to enable them to provide the types of development that are only acceptable within these areas. However, the site at Grayfield House is a large contained site of 7.5 acres that could accommodate a range of uses outwith Classes 4, 5 and 6, with negligible impact upon the operation of the surrounding uses. The site has good access potential with two existing accesses, and the

ability to have access from the four boundary roads that are located on each side. The site has the ability to provide for split level multi use high density development.

- 2.11 There are a number of uses that would be appropriate within the current business and industrial allocation, such as employment led office developments, trade counter units, storage and distribution units, and our client is supportive of these uses within the area and on the site. However, it is also submitted that there are a range of uses that would also be appropriate, and this should not be disregarded on the basis of the business and industrial allocation. These could include (but not exclusively), provision for nearby education establishments, leisure uses, student accommodation, build to rent and residential.
- 2.12 It is noted within the Choices Paper (Choice 10), that is a requirement for additional housing land to meet the long term future needs of the City. It submitted that there should be greater flexibility for the redevelopment of large, well located sites such as Grayfield House to be redeveloped for the uses that are required within Edinburgh, such as residential. Whilst it might be a long term aspiration, and other sites nearby may also be able to contribute towards the housing shortage, it is submitted that the policies imposed under the business and industrial use, should be more flexible to allow sites such as this to be considered for much needed urban housing. It is noted that further greenfield land is an option for new residential allocations. It is considered by our client, that existing urban brownfield sites with excellent integrated public transport links are better suited towards providing for this housing need, when compared with greenfield land.

#### **PURPOSE BUILT STUDENT ACCOMMODATION**

- 2.13 Within Choice 10, the Choices Paper proposes that a new policy on purpose-built student accommodation (PBSA) may be introduced in City Plan 2030. This policy may require all new PBSA to be located on a direct route to a university or college and that it is built for and managed by a university or college. The policy may limit the total number of studios in a PBSA scheme to a maximum of 10% of the total number of bed spaces and require that market and affordable housing is also delivered as part of the overall development.
- 2.14 Our client is concerned in relation to the proposed policy option that may require all future PBSA in Edinburgh to be built for and managed by a university or college in the city. It is not considered that a University or College involvement should be the sole determinant of acceptability, nor should there be an obligation placed on universities or colleges to take on the management of all PBSA.
- 2.15 If the Council choose to implement this, there is a risk that the policy option could create a monopoly over PBSA in the city, which could reduce competition between operators, adversely impact on pricing, and divert future investment away from Edinburgh.

#### **REQUIREMENT FOR RESIDENTIAL DEVELOPMENT ON DEVELOPMENTS SITES OVER 0.25 HECTARES**

- 2.16 Choice 10 also proposes that new purpose built student accommodation will require to deliver market and affordable housing as part of the mix. One of the options for this policy is for any development of 0.25hectares or over for student housing, hotels, retail and leisure developments, at least 50% of the site should be provided for housing. Whilst our client acknowledges and supports a mix of uses at Grayfield House (including residential), it is submitted that the mix should be market driven, with each site being assessed on their individual merits.

#### **CHOICE 11 – DELIVERING MORE AFFORDABLE HOMES**

- 2.17 Within the Choices Paper, CEC are considering amending their policy to increase the provision of affordable housing requirement from 25% to 35%.All development, including conversions, which consist of 12 residential units or more must include provision for affordable housing amounting to 35% of the total units. This policy will also apply to all land coming forward for other uses (as set out in Choice 10) i.e. where a site is required to deliver at least 50% housing, at least 35% of this housing must also be affordable. CEC wish City Plan 2030 to require a mix of housing types and tenures.

- 2.18 There is concern over the increasing of this affordable housing requirement in viability terms. It is submitted that affordable housing at this level should be assessed as part of a case-by-case basis, in order to understand the viability of the overall development. If it is to be implemented we would encourage greater flexibility around tenure and models / definitions of affordable housing product.

## **CHOICE 12 – BUILDING OUR NEW HOMES AND INFRASTRUCTURE**

- 2.19 It is recognised within the Choices Paper that there is a need to provide new homes for Edinburgh and additional land requires to be allocated for this.
- 2.20 Choice 12 provides three options on how and where City Plan 2030 will deliver new homes;
- a. delivery by the council and its partners within the Urban Area (17,600 units within the urban area,
  - b. delivery through market housing by releasing Greenfield land, (27,900 units on greenfield land) or
  - c. a blended approach, (a mix of the urban area land 11,000 units, and greenfield land 6,600 units).

CECs preference is for new homes to be delivered by the Council and its partners within the Urban Area.

- 2.21 Our clients would agree with this approach. The Urban Area contains many brownfield sites which are primed for redevelopment, particularly for residential development. Given the requirement for land to come forward to residential development, it is submitted that brownfield sites such as Grayfield House, with existing infrastructure in place, and links to public transport, should be considered before greenfield release.
- 2.22 It is submitted that Option 2 and the delivery of market housing through only greenfield land should not be considered against the development of brownfield land with existing infrastructure and connectivity in place. Our client agrees with the Council's preferred option of residential led mixed use development within the urban area.

## **CHOICE 13 – SUPPORTING INCLUSIVE GROWTH, INNOVATION, UNIVERSITIES AND CULTURE**

- 2.23 Choice 13 provides policy support for (amongst other uses), development associated with universities and colleges that relates to innovation and learning. Our client is supportive of this policy in principle and considers that the site at Grayfield House could meet with this requirement, should it be allowed for there to be greater flexibility of uses within business and industrial areas.

## **CHOICE 16 – DELIVERING OFFICE, BUSINESS AND INDUSTRY FLOORSPACE**

- 2.24 Choice 16 relates to supporting the office market within Edinburgh city centre and in other suitable locations across the City. As part of this support, it is proposed 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 uses, 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 it may only be imposed in the city centre.
- 2.25 Our client understands the Council's desire to protect office floorspace within the City. However, it is considered that in some circumstances the introduction of a loss of office policy that restricts the loss of office development, or requires office development to be built as part of the redevelopment, may not be appropriate in all cases.
- 2.26 It is considered that the retention of an office space has to be weighed against the characteristics of the specific building in question, the quality of the office accommodation offered along with the location of the development.
- 2.27 The demand for a particular office space is determined by a number of factors which can include the cost of the office space and the accessibility of its location. The office building itself is also a significant demand factor for reasons of IT efficiency, productivity and the working environment a company is looking for in relation to its culture.



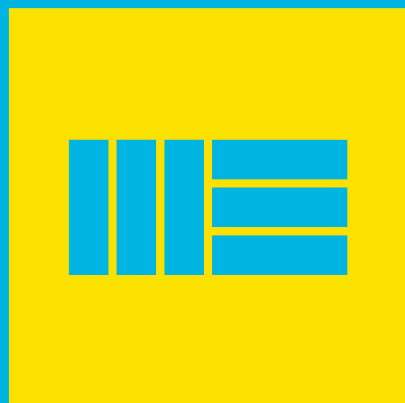
- 2.28 The office accommodation at Grayfield House is in a location amongst a range of other uses, and very few of them are Class 4 office buildings. The mechanical and electrical systems are well past their natural lifespan and are not considered acceptable for future use. The heating system is inefficient and not sustainable. The floor to ceiling heights of the building are a major challenge for modern office occupiers, who would struggle to run data and telecommunications cabling around the space. Furthermore the floor plates of the building would be difficult to remodel to achieve an open-plan working environment, which is favoured by modern office occupiers.
- 2.29 In these circumstances, an alternative use requires to be considered in order to allow the modernisation and redevelopment of the building or site.
- 2.30 As such, it is considered that if a policy were introduced by CEC that protected the loss of all office floorspace within the City, then dated office developments, such as Grayfield House would likely remain vacant in the market instead of being redeveloped and sustained for future years.
- 2.31 It is submitted that if CEC consider that a loss of office floorspace policy is required, there should be an exception for offices that are no longer fit for purpose and that these can be redeveloped as the market demands.

# 03 SUMMARY

- 3.1 Our client broadly supports the principles of Choice 10, with the proviso that not just commercial centres and out of town retail sites, are considered for alternative uses. It is considered that each site should be considered on its own merits, and a range of uses are supported at Grayfield House, Edinburgh.
- 3.2 Our client supports the principles of Choices 2, 12 and 13 with regards to density of development, promotion of brownfield urban sites for residential development and considering policy support for development associated with universities and colleges that relates to innovation and learning within specific locations.
- 3.3 It is submitted that the proposed increase in the affordable housing percentage provision (Choice 11) should not be included as part of the forthcoming LDP, and each case should be assessed on its own merits.
- 3.4 Our client has concerns with regards to Choice 16 and does not consider that a blanket policy protecting all office development should come forward. This could be to the detriment of redeveloping office buildings that are currently not fit for purpose, or desirable to future occupiers.
- 3.5 We trust that the above and attached will be given due regard in the process of preparing the new City Plan 2030. We would be grateful to be kept advised of future opportunities to engage in the process and would be pleased to meet with the Council to further discuss matters as required.

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