

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 Provision of a new policy in the forthcoming LDP which takes account of connecting places, parks and greenspaces is supported by our client. These important components contribute to health and well-being and help further the Council's zero carbon agenda. Subsequently, encouragement for walking, cycling and sport are generally supported. In planning for any development, our client recognises the inclusion of green and blue infrastructure, providing appropriate open space, trees and utilising SUD's for their aquatic/ecological habitats and bio-diversity.

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 As part of a masterplanned approach the development of our client's site in conjunction with neighbouring landholdings can provide appropriate open space. Our client would support a collaborative approach to the development of multiple landholdings in rural south west Edinburgh to ensure appropriate green infrastructure is provided.

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Response Type: Agent / Consultant
On behalf of: Mr Neil J Campbell

Supporting Info:
Email: jessica.powell@colliers.com

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

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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 The proposed new requirements under criterion e) to provide open space in any new development require to be proportionate and should not fall only to developers to provide. There requires to be a comprehensive audit of existing open space provision throughout the City and only where distinct deficiencies are identified, a proportionate response should be sought via new development, which recognises the proposed use and its impact on green/blue infrastructure. We would not support the introduction of a blanket 'extra-large green space standard' of five hectares for each development. Green spaces of this size are extensive and we consider it would be disproportionate to expect new development to provide this level of Green Space, even if new development is of a high-density.

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

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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? - 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

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

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Choice **2 A**

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

Short Response

Explanation

Choice **2 B**

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

Short Response

Explanation The proposed further densification of development to a minimum 65 units per hectare is ambitious and this places doubt as to whether this will allow for the provision of a full tenure range and choice of housing across a development. Perhaps this proposed standard could be applied to urban brownfield sites, with the application of a lesser density range from 50-65 units per Ha for greenfield land releases, in sustainable locations, which are close to public transport and active travel routes. We would also question whether that level of development is appropriate for greenfield development in edge of settlement locations. Whilst the efficient use of land is encouraged by Scottish Planning Policy it should not be at the expense of placemaking and the creation of future places that we can be proud of. The proposed minimum density represents an increase two fold of the desired density from the existing Edinburgh Local Development Plan which expected 30 units per hectare from greenfield sites. In addition, it is not clear whether the 65 units per hectare is intended to apply to the gross area or Net Developable Area of the site, the latter being the way most housebuilders would consider density. Density should be delivered on a site by site basis dependent upon the particular circumstances of that individual site and its characteristics.

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Choice 2 C

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

Short Response

Explanation Any development proposals which come forward on the site at Merrydene Field will include streets, a road layout and a sense of place which 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 Our client is supportive of the approach to ensuring high quality places and seek collaboration with adjacent land to undertake a masterplan-led approach to a well-considered extension to south west Edinburgh, in order to achieve a high-quality development suitable for its location.

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

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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 Our client recognises 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, our client believes that emissions standards for new buildings should continue to be addressed within the building standards regulations and not the planning system. This proposal would cause needless duplication, when the focus should be on maximising the efficiency of the existing planning resource. Therefore, apart from an overall Edinburgh Council view of seeking to achieve carbon neutral buildings, this should not result in a bespoke planning policy in the LDP.

Choice **4 A**

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

Short Response

Explanation The ambition of CEC to have Place Briefs prepared in conjunction with local communities for 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. 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 and the policy should be appropriately worded to involve landowners in this process. 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 the purpose of Local Place Plans should be to guide, not prevent development.

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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 Our client concurs with the Council view that development should be directed to areas of existing or under-utilised infrastructure. If new infrastructure is required, improvements are sought and investment needed, developer contributions require to be guided by Planning Circular 3/2012 – Planning Obligations and the associated tests and legal court judgements. Developer contributions must be proportionate and directly relevant to development proposals. In addition, it is important that the Council acknowledges that putting too much burden on developers, and ultimately landowners, to pay for infrastructure can result in development becoming unviable and land being withdrawn from the market. In terms of Education infrastructure, key to the delivery of new housing, that three new non-denominational primary schools and one new non-denominational secondary school are considered to be required to support development at the East of Riccarton. In delivering this key infrastructure the Council will need to have consideration to; denser developments with smaller properties will actually produce a pupil product to justify contributions, particularly as high-density developments at over 65 units per Hectare is unlikely to be deliver family housing. The delivery of Healthcare infrastructure is contingent upon the NHS engaging with the plan-making process and development management process. The provision of appropriate health care to serve new developments is often a key concern of local communities during the planning application process and problems could often be reduced by better engagement by the health authorities and GP surgeries in the planning process. It is noted that a Healthcare Appraisal is to accompany the Proposed Plan and this is welcomed, provided the NHS appropriately input into its content. Importantly, the planning of future health care services is a matter the NHS Lothians to address and not developers. Subsequently, contributions should not be sought.

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Choice 5 B

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

Short Response

Explanation Transport Infrastructure is key to the delivery of new development. It is noted that the Edinburgh Strategic Sustainable Transport Study identifies a new transport corridor (Corridor 8) to serve the area in the vicinity of our client's site, the area to the west and the nearby Heriot-Watt University. If the blended approach to delivering the housing needs of Edinburgh is considered to be required, improved public transport will be required to serve our client's site and the land to the west and corridor 8 improvements will need to be brought forward into the plan period. As above it is important that any developer contributions to facilitate this are proportionate and meet the tests of the Planning Obligations circular. Our client therefore supports proposed changes A – E.

Choice 5 C

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

Short Response

Explanation

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Choice 5 D1

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

Short Response

Explanation

Choice 5 D2

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

Short Response

Explanation

Choice 5 E

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

Short Response

Explanation

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Choice **6 A**

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

Short Response

Explanation

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 The key to reducing car use in Edinburgh is the provision of new and improved public transport, and an integrated approach between different modes of transport; bus, trams, walking and cycling. If improved public transport provision is not provided alongside developments then a modal shift from car to sustainable transport will not occur. We would support the proposed changes to the plan as outlined provided the requisite improvements and provision of public transport can be delivered at the outset of development and fully incorporated into any masterplan. Our client therefore supports proposed changes A-E.

Choice **7 B**

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

Short Response

Explanation

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Choice **7 C**

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

Short Response

Explanation

Choice **7 D**

We want to support the city's park and ride infrastructure by safeguarding sites for new park and ride and extensions, including any other sites that are identified in the City Mobility Plan or its action plan. Do you agree with this? - We want to support the city's park and ride infrastructure by safeguarding sites for new park and ride and extensions, including any other sites that are identified in the City Mobility Plan or its action plan.

Short Response

Explanation

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On behalf of:

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 The aim to provide new walking and cycling routes is laudable. Our client believes 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. The improvement of walking and cycling routes from Sighthill past the Heriot-Watt area would be welcomed, as outlined on Map five in the choices document which is welcomed. Walking and cycling routes to and from our client site through the redevelopment, and connections could be made to Heriot-Watt University, Curriehill Station and Hermiston Park & ride. Our client therefore supports proposed changes A-C

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

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Response Type Agent / Consultant
On behalf of: Mr Neil J Campbell

Supporting Info
Email jessica.powell@colliers.com

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 Not Answered

Explanation This future policy aims to tackle matters relative to short term lets in the City and is not a matter that our client wishes to provide representations on, other than noting that the provision of short-term lets in the City reduces the availability of permanent homes for residents whether for purchase or letting, and has a knock-on effect for housing demand and need across the city. The 2015 Housing Needs and Demand Assessment will not wholly reflect the trend towards short-term lets in Edinburgh and subsequently will not fully reflect the loss of housing units from the long term residential market. Our client offers no comments on the proposed changes in choice 9.

Choice 9 B

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

Short Response Not Answered

Explanation

Customer Ref: 01697 Response Ref: ANON-KU2U-GWUP-A

Name COLLIERS INTERNATIONAL

Response Type Agent / Consultant

On behalf of: Mr Neil J Campbell

Supporting Info

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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 No

Explanation Our client supports the aim to increase the number of new homes in Edinburgh including affordable housing. However, we would caution against the requirement for proposals for student housing, hotels, and short-stay commercial visitor accommodation to provide 50% of the site for housing. Uses require to be compatible and not all student housing sites can provide a variety of other planning uses and tenure types. This approach may serve to be a disincentive for investment in Edinburgh from specific types of developers. Our client therefore does not support the changes and considers that the current policy approach should continue with options D & E.

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 Not Answered

Explanation

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Response Type Agent / Consultant

On behalf of: Mr Neil J Campbell

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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

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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, the aim to increase the affordable housing requirement to 35% from 25% requires to be carefully considered. Addressing affordability will require an element of subsidised affordable housing, but this should not be seen as the only policy mechanism available 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, and the Council now faces requiring developers to develop an unprecedented level of density as a direct result of historic decisions made by the Council as planning authority who were unwilling to meet the city's housing needs in a planned manner. Our Client believes that the 25% level of affordable housing should remain for urban brownfield sites, on the basis of viability. They are willing to support a further 10% affordable housing on greenfield sites raising it to the Council's desired 35%, but on the conditional basis this additional 10% is not social provision, but discounted/low cost home ownership affordable housing. This is despite the fact that this is an Edinburgh Council policy and not one that is supported by the existing Scottish Planning Policy which states that the 'level of affordable housing required as a contribution within a market site should 'generally be no more than 25% of the total numbers of houses' in paragraph 129. Alternatively, an alternative for use of the additional 10% would be for provision of housing for older people as required by the new Planning Act.

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Choice 11 B

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

Short Response:

Explanation

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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. We 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). Our client supports the Councils' 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. It is not considered 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. Our client believes 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 market housing is a dogmatic approach that does not reflect the collaboration needed, to ensure all tenure provision is provided for in full, in Edinburgh, over the next decade. 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. Our client recognises the importance of reusing previously developed land as a key objective of the planning system. 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. Our client believes that a balanced approach is required with a combination of brownfield and

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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 our client, 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. Our client believes that this will require deliverable sites from all tenure options to ensure that the housing requirements of the city are met in full. We note that the Council's preferred option of delivery of high density brownfield land in which the Council will have to intervene, potentially using Compulsory Purchase powers, 'is outlined in the Choices document as possibly not being financially viable. The acquisition of private land through Compulsory Purchase Powers, and its subsequent delivery for housing should not be underestimated and will represent a significant drain on Council resources over a long period of time. Of the options suggested in the Choices document Option C would be our client's preferred option and seems the most pragmatic approach to delivering the much needed housing, however that should be caveated by the overall need to meet the requirements of the Housing Need in full outlined above. It is recognised that West Edinburgh has significant potential for growth due to its existing infrastructure and consequently we would support the consideration of further land in west Edinburgh to support the aims of the City Region Deal for Edinburgh and South East Scotland. We note that Area 4 – East of Riccarton is identified as potential greenfield release on page 42. We would support a wider cohesive masterplanned approach to delivering further housing in south west Edinburgh and our client has ownership of a moderate site north of Balerno which is appropriate for development and has potential to form part of a wider strategic west Edinburgh extension area allocation for housing-led development, rather than a disjointed approach.

Choice 12 B1

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

Short Response

Explanation

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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 Not Answered

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 Not Answered

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 Not Answered

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

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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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 Not Answered

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 Not Answered

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 Not Answered

Explanation

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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

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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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Name
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On behalf of:

Supporting Info
Email

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 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 our client believes that a balance is required between the west and south east of the city. We would support the area outlined on the Map on page 51 as an ‘area of search’ as part of an ongoing review of West Edinburgh development proposals and opportunities. Given the location of Merrydene Field adjacent to the urban area of Balerno and its proximity to key transport nodes at the airport, the city bypass and the tramline, it is considered that the future of the subject site is to accommodate development as part of Edinburgh’s growth to the west. Our client therefore supports proposed changes A-C.

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **14 C**

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

Short Response

Explanation

Choice **15 A**

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

Short Response

Explanation

Choice **15 B**

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 15 C

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

Short Response

Explanation

Choice 15 D

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

Short Response

Explanation

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 15 G

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

Short Response

Explanation

Choice 16 A1

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

Short Response

Explanation

Choice 16 A2

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

Short Response

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 16 A3

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

Short Response

Explanation

Choice 16 A4

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

Short Response

Explanation

Choice 16 A5

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

Short Response

Explanation Our client notes that Option A of the council's approach to delivering housing involves the use of large scale amounts of employment land for high density housing. As the economy progresses and grows the lost employment land needs to be found elsewhere in the plan area and therefore pressure on the outer areas of Edinburgh arises for greenfield development for these employment uses. We note the proposed changes, including Option B which involves the provision of business space in Place Briefs for greenfield sites. We do not agree with this approach as a requirement, though it should be market-led on an opportunity basis for the greenfield sites. Our client therefore supports proposed changes A, C & D but not B.

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 A5

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

Short Response

Explanation

Choice 16 B

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

Short Response

Explanation

Choice 16 C

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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:

Name

Response Type

On behalf of:

Supporting Info

Email

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: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 F

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

Short Response

Explanation

Choice 16 G

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

Short Response

Explanation

Choice 16 H

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

Short Response

Explanation

Customer Ref:

01697

Response Ref:

ANON-KU2U-GWUP-A

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Response Type

Agent / Consultant

On behalf of:

Mr Neil J Campbell



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

MARCH 2020

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1 INTRODUCTION

1.1 OVERVIEW

Colliers International represent Mr Neil J Campbell and welcome the opportunity to comment on the City of Edinburgh Council Main Issues Report – Choices for City Plan 2030.

Our client believes that in order for CEC to meet their significant identified housing need, a variety of site options will be required to ensure that the housing requirements of the city are met in full.

Our Client, Mr Campbell owns a parcel of land known as Merrydene Field, which lies at the junction of Ravelrig Road and Long Dalmahoy Road in south west Edinburgh.

The site is outlined in red on the accompanying site plan in Appendix 1. The site is approximately 2.4Ha in size and is currently in agricultural use. It sits within the statutory Green Belt.

We consider that significantly more land is required to fulfil Edinburgh's identified housing need and subsequently the blended approach is preferred and both brownfield and greenfield sites require to be identified.

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. Under the new planning reforms, the SPP is to be incorporated within the National Planning Framework, consolidating the Scottish Government spatial strategy and planning policy. Scottish Planning Policy will subsequently form part of the statutory development plan, however it still remains a significant material consideration.

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

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.

Local development plans should allocate appropriate sites to support the creation of sustainable mixed communities and successful places and help to ensure the continued delivery of new housing.

It is against this policy framework that the Council are producing their new Local Development Plan.

3 CHOICES FOR CITY PLAN 2030

BACKGROUND

The main planning consideration for our client is the Council's requirement to meet and deliver its identified housing need in full over the next decade.

Historically, Edinburgh has failed to meet its housing demand in full. This trajectory is one which the Scottish Government are keen for Edinburgh City Council to resolve.

Commentary is provided in this submission on the series of choices outlined by the Council in the Main Issues Report and supporting documentation.

The Choices for City Plan 2030 document sets out a statement which outlines the vision for Edinburgh;

'By 2030, we want Edinburgh to be..'

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

These are commendable aims and objectives for the new Local Development Plan which are welcomed, particularly the aim to ensure that everyone lives in a home that they can afford. This aim represents a significant challenge to the Council and is one which our client can assist with in providing land to the housing market for residential development as part of a cohesive and considered extension to south west Edinburgh.

The individual 'Choices' presented for discussion in the consultation document will be addressed below.

3.1 CHOICE ONE - EDINBURGH, SUSTAINABLE, ACTIVE AND CONNECTED

Provision of a new policy in the forthcoming LDP which takes account of connecting places, parks and greenspaces is supported by our client. These important components contribute to health and well-being and help further the Council's zero carbon agenda. Subsequently, encouragement for walking, cycling and sport are generally supported.

In planning for any development, our client recognises the inclusion of green and blue infrastructure, providing appropriate open space, trees and utilising SUD's for their aquatic/ecological habitats and bio-diversity.

As part of a masterplanned approach the development of our client's site in conjunction with neighbouring landholdings can provide appropriate open space. Our client would support a collaborative approach to the development of multiple landholdings in rural south west Edinburgh to ensure appropriate green infrastructure is provided.

The proposed new requirements under criterion e) to provide open space in any new development 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, a proportionate response should be sought via new development, which recognises the proposed use and its impact on green/blue infrastructure.

We would not support the introduction of a blanket 'extra-large green space standard' of five hectares for each development. Green spaces of this size are extensive and we consider it would be disproportionate to expect new development to provide this level of Green Space, even if new development is of a high-density.

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

The proposed further densification of development to a minimum 65 units per hectare is ambitious and this places doubt as to whether this will allow for the provision of a full tenure range and choice of housing across a development.

Perhaps this proposed standard could be applied to urban brownfield sites, with the application of a lesser density range from 50-65 units per Ha for greenfield land releases, in sustainable locations, which are close to public transport and active travel routes.

We would also question whether that level of development is appropriate for greenfield development in edge of settlement locations. Whilst the efficient use land is encouraged by Scottish Planning Policy it should not be at expense of placemaking and the creation of future places that we can be proud of.

The proposed minimum density represents an increase two fold of the desired density from the existing Edinburgh Local Development Plan which expected 30 units per hectare from greenfield sites. In addition, it is not clear whether the 65 units

per hectare is intended to apply to the gross area or Net Developable Area of the site, the latter being the way most housebuilders would consider density. Density should be delivered on a site by site basis dependent upon the particular circumstances of that individual site and its characteristics.

Any development proposals which come forward on the site at Merrydene Field will include streets, a road layout and a sense of place which 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

Our client is supportive of the approach to ensuring high quality places and seek collaboration with adjacent land to undertake a masterplan-led approach to a well-considered extension to south west Edinburgh, in order to achieve a high-quality development suitable for its location.

3.3 CHOICE THREE – CARBON NEUTRAL BUILDINGS

Our client recognises 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, our client believes that emissions standards for new buildings should continue to be addressed within the building standards regulations and not the planning system. This proposal would cause needless duplication, when the focus should be on maximising the efficiency of the existing planning resource. Therefore, apart from an overall Edinburgh Council view of seeking to achieve carbon neutral buildings, this should not result in a bespoke planning policy in the LDP.

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 for 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. 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 and the policy should be appropriately worded to involve landowners in this process.

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 the purpose of Local Place Plans should be to guide, not prevent development.

Our client does not support proposed changes A & B and consider option C should be retained. If option A & B are taken forward recognition of the role landowners should play in the plan-making process should be acknowledged.

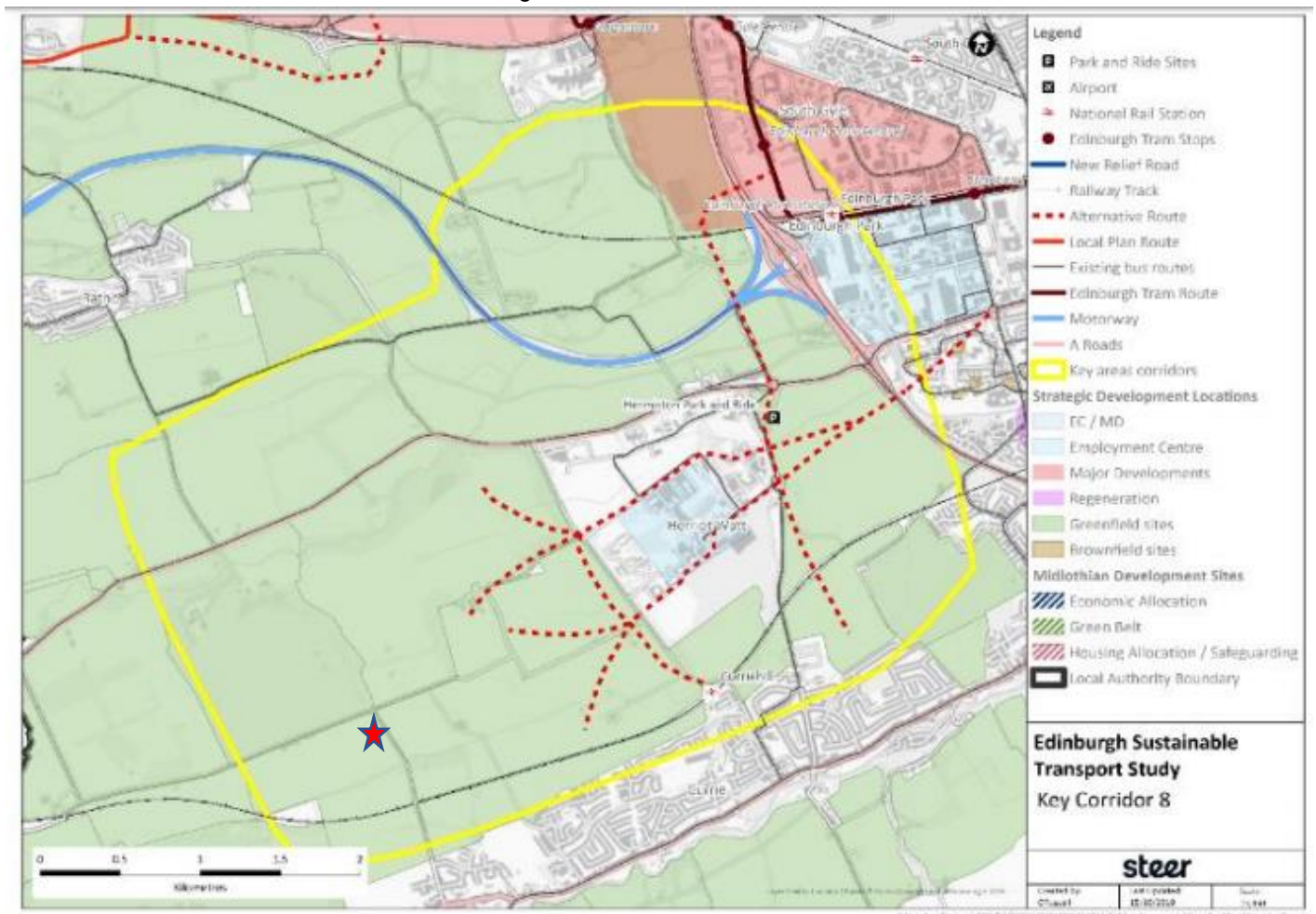
3.5 CHOICE FIVE – DELIVERING COMMUNITY INFRASTRUCTURE

Our client concurs with the Council view that development should be directed to areas of existing or under-utilised infrastructure. If new infrastructure is required, improvements are sought and investment needed, developer contributions require to be guided by Planning Circular 3/2012 – Planning Obligations and the associated tests and legal court judgements. Developer contributions must be proportionate and directly relevant to development proposals. In addition, it is important that the Council acknowledges that putting too much burden on developers, and ultimately landowners, to pay for infrastructure can result in development becoming unviable and land being withdrawn from the market.

In terms of Education infrastructure, key to the delivery of new housing, that three new non-denominational primary schools and one new non-denominational secondary school are considered to be required to support development at the East of Riccarton. In delivering this key infrastructure the Council will need to have consideration to; denser developments with smaller properties will actually produce a pupil product to justify contributions, particularly as high-density developments at over 65 units per Hectare is unlikely to be deliver family housing.

The delivery of Healthcare infrastructure is contingent upon the NHS engaging with the plan-making process and development management process. The provision of appropriate health care to serve new developments is often a key concern of local communities during the planning application process and problems could often be reduced by better engagement by the health authorities and GP surgeries in the planning process. It is noted that a Healthcare Appraisal is to accompany the Proposed Plan and this is welcomed, provided the NHS appropriately input into its content. Importantly, the planning of future health care services is a matter the NHS Lothians to address and not developers. Subsequently, contributions should not be sought.

Transport Infrastructure is key to the delivery of new development. It is noted that the Edinburgh Strategic Sustainable Transport Study identifies a new transport corridor (Corridor 8) to serve the area in the vicinity of our client's site (identifiable by the red star), the area to the west and the nearby Heriot-Watt University as detailed in the below figure.



If the blended approach to delivering the housing needs of Edinburgh is considered to be required, improved public transport will be required to serve our client's site and the land to the north and corridor 8 improvements will need to be brought forward into the plan period. As above it is important that any developer contributions to facilitate this are proportionate and meet the tests of the Planning Obligations circular.

Our client therefore supports proposed changes A – E.

3.6 CHOICE SIX – PEOPLE NOT CARS

Our client would support the principle that new developments should prioritise public transport, walking and cycling as mode of transports and support the proposed changes.

Key to this is the provision of quality public transport for any new development and connectivity for the new development into existing footpaths and cycleways. A masterplanning exercise, working with adjacent landowners and public transport operators can ensure that this is the case, and that the focus is on sustainable modes of transport rather than private car.

Our client therefore supports proposed changes A & B.

3.7 CHOICE SEVEN – REDUCE CAR USE

The key to reducing car use in Edinburgh is the provision of new and improved public transport, and an integrated approach between different modes of transport; bus, trams, walking and cycling. If improved public transport provision is not provided alongside developments then a modal shift from car to sustainable transport will not occur. We would support the proposed changes to the plan as outlined provided the requisite improvements and provision of public transport can be delivered at the outset of development and fully incorporated into any masterplan.

Our client therefore supports proposed changes A-E.

3.8 CHOICE EIGHT – DELIVERING NEW WALKING/CYCLING ROUTES

The aim to provide new walking and cycling routes is laudable. Our client believes 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.

The improvement of walking and cycling routes from Sighthill past the Heriot-Watt area would be welcomed, as outlined on Map five in the choices document which is welcomed.

Walking and cycling routes to and from our client site through the redevelopment, and connections could be made to Heriot-Watt University, Curriehill Station and Hermiston Park & ride.

Our client therefore supports proposed changes A-C

3.9 CHOICE NINE – PROTECTING AGAINST LOSS OF HOMES

This future policy aims to tackle matters relative to short term lets in the City and is not a matter that our client wishes to provide representations on, other than noting that the provision of short-term lets in the City reduces the availability of permanent homes for residents whether for purchase or letting, and has a knock-on effect for housing demand and need across the city. The 2015 Housing Needs and Demand Assessment will not wholly reflect the trend towards short-term lets in Edinburgh and subsequently will not fully reflect the loss of housing units from the long term residential market.

Our client offers no comments on the proposed changes in choice 9.

3.10 CHOICE TEN - CREATING SUSTAINABLE COMMUNITIES

Our client supports the aim to increase the number of new homes in Edinburgh including affordable housing. However, we would caution against the requirement for proposals for student housing, hotels, and short-stay commercial visitor accommodation to provide 50% of the site for housing. Uses require to be compatible and not all student housing sites can provide a variety of other planning uses and tenure types. This approach may serve to be a disincentive for investment in Edinburgh from specific types of developers.

Our client therefore does not support the changes and considers that the current policy approach should continue with options D & E.

3.11 CHOICE ELEVEN – AFFORDABLE HOUSING

Whilst the Council's aspiration to build 20,000 affordable homes is noted, the aim to increase the affordable housing requirement to 35% from 25% requires to be

carefully considered. Addressing affordability will require an element of subsidised affordable housing, but this should not be seen as the only policy mechanism available 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, and the Council now faces requiring developers to develop an unprecedented level of density as a direct result of historic decisions made by the Council as planning authority who were unwilling to meet the city's housing needs in a planned manner.

Our Client believes that the 25% level of affordable housing should remain for urban brownfield sites, on the basis of viability. They are willing to support a further 10% affordable housing on greenfield sites raising it to the Council's desired 35%, but on the conditional basis this additional 10% is not social provision, but discounted/low cost home ownership affordable housing.

This is despite the fact that this is an Edinburgh Council policy and not one that is supported by the existing Scottish Planning Policy which states that the 'level of affordable housing required as a contribution within a market site should *generally be no more than 25% of the total numbers of houses*' in paragraph 129.

Alternatively, an alternative for use of the additional 10% would be for provision of housing for older people as required by the new Planning Act.

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. We 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).

Our client supports the Councils' 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. It is not considered 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.

Our client believes 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 market housing is a dogmatic approach that does not reflect the collaboration needed, to ensure all tenure provision is provided for in full, in Edinburgh, over the next decade.

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. Our client recognises the importance of reusing previously developed land as a key objective of the planning system. 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.

Our client believes 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 our client, 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.

Our client believes that this will require deliverable sites from all tenure options to ensure that the housing requirements of the city are met in full.

We note that the Council's preferred option of delivery of high density brownfield land in which the Council will have to intervene, potentially using Compulsory Purchase powers, 'is outlined in the Choices document as possibly not being financially viable. The acquisition of private land through Compulsory Purchase Powers, and its subsequent delivery for housing should not be underestimated and will represent a significant drain on Council resources over a long period of time.

Of the options suggested in the Choices document Option C would be our client's preferred option and seems the most pragmatic approach to delivering the much needed housing, however that should be caveated by the overall need to meet the requirements of the Housing Need in full outlined above.

It is recognised that West Edinburgh has significant potential for growth due to its existing infrastructure and consequently we would support the consideration of further land in west Edinburgh to support the aims of the City Region Deal for Edinburgh and South East Scotland.

We note that Area 4 – East of Riccarton is identified as potential greenfield release on page 42. We would support a wider cohesive masterplanned approach to delivering further housing in south west Edinburgh and our client has ownership of a moderate site north of Balerno which is appropriate for development and has potential to form part of a wider strategic west Edinburgh extension area allocation for housing-led development, rather than a disjointed approach.

3.13 CHOICE THIRTEEN – INNOVATION, UNIVERSITIES AND CULTURE

A policy provision in the LDP that supports social enterprises, startups, culture, tourism, innovation, learning and a low carbon sector are supported by our client, as these enrich the City.

Our client therefore supports proposed 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 our client believes that a balance is required between the west and south east of the city.

We would support the area outlined on the Map on page 51 as an 'area of search' as part of an ongoing review of West Edinburgh development proposals and opportunities.

Given the location of Merrydene Field adjacent to the urban area of Balerno and its proximity to key transport nodes at the airport, the city bypass and the tramline, it is considered that the future of the subject site is to accommodate development as part of Edinburgh's growth to the west.

Our client therefore supports proposed changes A-C.

3.15 CHOICE FIFTEEN – PROTECTING CITY, TOWN AND LOCAL CENTRES

Edinburgh fortunately benefits from a healthy range of local, town and thriving city centres. Our client supports 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.

3.16 CHOICE SIXTEEN – DELIVERING OFFICE, BUSINESS AND INDUSTRIAL FLOORSPACE

Our client notes that Option A of the council's approach to delivering housing involves the use of large scale amounts of employment land for high density housing. As the economy progresses and grows the lost employment land needs to be found elsewhere in the plan area and therefore pressure on the outer areas of Edinburgh arises for greenfield development for these employment uses.

We note the proposed changes, including Option B which involves the provision of business space in Place Briefs for greenfield sites. We do not agree with this approach as a requirement, though it should be market-led on an opportunity basis for the greenfield sites.

Our client therefore supports proposed changes A, C & D but not B.

4 MERRYDENE FIELD, BALERNO

4.1 SITE CONTEXT AND PROPOSED STRATEGY

The preceding sections set out our client's views on the scale of housing and the balanced strategy required to ensure that Edinburgh meets its housing requirement in full over the next decade. It is considered that significantly more land is required to fulfil Edinburgh's identified housing need and subsequently a blended approach of both brownfield and greenfield sites require to be identified.

Our client owns a parcel of land known as Merrydene Field, part of Newhouse Farm which lies at the junction of Ravelrig Road and Long Dalmahoy Road.

The surrounding land uses include the Edinburgh to Glasgow railway line to the south, and the suburban area of Balerno is further south. A Local Nature Conservation site lies further west and Dalmahoy golf course lies immediately north of Long Dalmahoy Road. To the north-west lies the campus of Heriot-Watt university.

The landholding comprises approximately 6 acres which our Client considers as appropriate for allocation for residential-led development as part of a wider south westwards expansion area for Edinburgh in the next Local Development Plan.

West Edinburgh is set to experience significant new development to facilitate the expansion of Edinburgh. Rural south west Edinburgh can play an important role in accommodating the logical infill and expansion of existing village settlements to provide new homes, and the provision of further research and development facilities at the university campus.

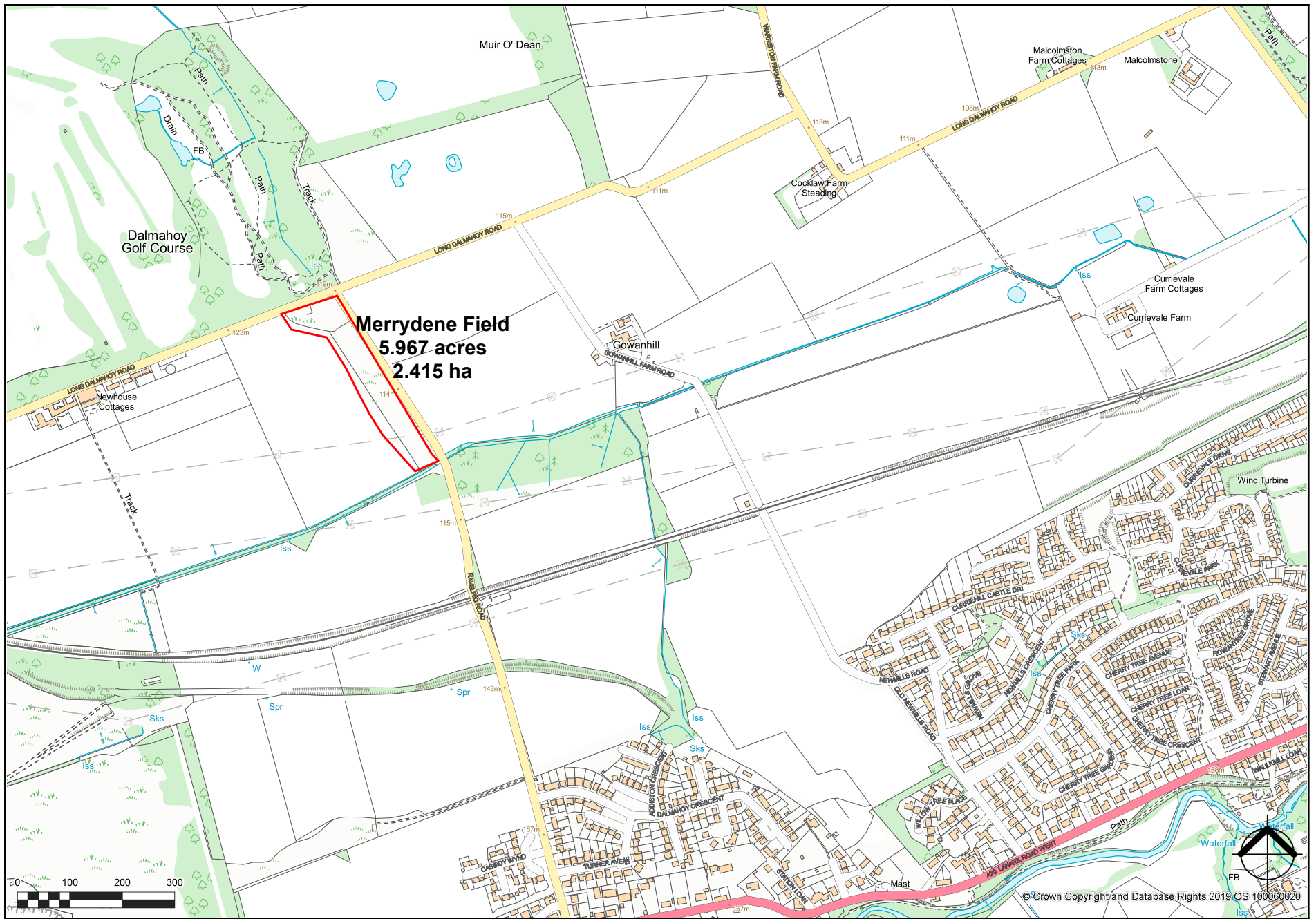
Subsequently, further allocations and development of housing sites within the greenbelt around south west Edinburgh may be appropriate to meet the identified housing need. The rural character and landscape of south west Edinburgh will remain important in the Masterplanning process of any future development proposals.

The proposed spatial strategy to expand the city south westwards should be considered within the West Edinburgh Study. This will be important to ensure that The Edinburgh and South East Scotland City Region Deal is appropriately supported and that best use is made of existing public transport infrastructure to accommodate the development of a mix of uses to support inclusive, sustainable growth.

Our client requests that their site at Merrydene Field, Balerno is allocated as a residential-led site, as part of a wider spatial strategy for the south west expansion of Edinburgh in the new CEC LDP.

APPENDIX 1:

Merrydene Field, Ravelrig Road, Balerno



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