

Customer Ref: 01696      Response Ref: ANON-KU2U-GPP7-5  
Name Adam Richardson  
Response Type Agent / Consultant  
On behalf of: Saica Group

Supporting Info Yes  
Email arichardson@savills.com

Choice 1 A

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

Short Response Not Answered

Explanation Not Answered

Choice 1 B

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

Short Response Not Answered

Explanation Not Answered

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Choice **1 C**

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

Short Response

Explanation

Choice **1 D**

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

Short Response

Explanation

Choice **1 E**

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

Short Response

Explanation

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On behalf of:

Supporting Info

Email

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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Email

Choice **1 H**

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

Short Response

Explanation

Choice **2 A**

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

Short Response

Explanation

Choice **2 B**

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

Short Response

Explanation

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Choice **2 C**

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

Short Response

Explanation

Choice **2 D**

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

Short Response

Explanation

Choice **3 A**

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

Short Response

Explanation

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Choice **4 A**

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

Short Response

Explanation

Choice **4 B**

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

Short Response

Explanation

Choice **5 A**

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

Short Response

Explanation

Customer Ref:  Response Ref:

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Response Type

On behalf of:

Supporting Info

Email

Choice **5 B**

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

Short Response

Explanation

Choice **5 C**

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

Short Response

Explanation

Choice **5 D1**

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

Short Response

Explanation

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On behalf of:

Supporting Info

Email

Choice 5 D2

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

Short Response

Explanation

Choice 5 E

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

Short Response

Explanation

Choice 6 A

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

Short Response

Explanation



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Response Type

On behalf of:

Choice **6 B**

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

Short Response

Explanation

Choice **7 A**

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

Short Response

Explanation

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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Response Type

On behalf of:

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

Choice **8 A**

**We want to update our policy on the Cycle and Footpath Network to provide criteria for identifying new routes. Do you agree with this? - Yes / No**

Short Response

Explanation

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Email

Choice **8 B**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

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Response Type

On behalf of:

Choice **9 A**

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

Short Response

Explanation

Choice **9 B**

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

Short Response

Explanation

Choice **10 A**

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

Short Response

Explanation

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Choice **10 B**

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

Short Response

Explanation

Choice **10 C**

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

Short Response

Explanation

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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** Partial acceptance. In relation to Issue 11A, it is recognised that affordability is a particular challenge in parts of Edinburgh compared with other cities and authorities in Scotland and that, in some instances, it is important to address this issue with revised policy requirements. Notwithstanding, a blanket requirement for all sites of 12 or more units to deliver an affordable housing provision of 35% may result in viability issues on certain schemes. As such, it is considered that additional wording should be included within any new policy requirement for 35% affordable housing to ensure viability concerns can be fully considered on a site by site basis, if need be. This would allow flexibility to be applied in select circumstances to ensure the delivery of much need market and affordable housing.

Choice **11 B**

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

Short Response

**Explanation**

Customer Ref: 01696 Response Ref: ANON-KU2U-GPP7-5

Name Adam Richardson

Response Type Agent / Consultant

On behalf of: Saica Group

Supporting Info Yes

Email arichardson@savills.com

Choice 12 A

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

Short Response Option 3 (Blended)

Explanation The reuse of brownfield land within the urban area is clearly appropriate and supported, as is the identified ability of its Turnhouse Road site in Choices to contribute towards the identified housing targets in the forthcoming plan period, in contrast to many of the other brownfield sites identified. As such, it is recognised that greenfield release will also be required in order to meet such housing targets in a market facing manner, meaning a blended spatial approach ('Option 3') should be adopted by the Council. See submitted Representation document for full details (Para 4.24 onwards).

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

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

Customer Ref:  Response Ref:

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On behalf of:

Supporting Info

Email

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

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



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Supporting Info

Email

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

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

Customer Ref: 01696 Response Ref: ANON-KU2U-GPP7-5

Name Adam Richardson

Response Type Agent / Consultant

On behalf of: Saica Group

Supporting Info Yes

Email arichardson@savills.com

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

Choice 12 BX

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

Short Response Not Answered

Explanation

Customer Ref:  Response Ref:

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Response Type

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Supporting Info

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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 C**

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

Short Response

Explanation

Choice **12 C**

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

Short Response

Explanation

Customer Ref:  Response Ref:

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Response Type

On behalf of:

Supporting Info

Email

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** Partial Support - please see full representation document. The submitted Representation has confirmed the newly changed commercial position at the subject land at Turnhouse Road – identified in Choices as Site Ref: 281 ‘Turnhouse Road (SAICA)’ – with Saica Group having recently announced the consolidation of their Edinburgh and Milngavie sites in a new location in Livingston. Correspondingly, they are due to relocate operations from their Turnhouse Road site by the end of 2021, creating a certain, short term and significant brownfield gateway redevelopment opportunity. The existing and emerging surrounding context means the site is highly suitable for redevelopment, with the Saica operation increasingly incongruous with the future direction of the wider area. Development of the site will complement the current expansion aspirations in West Edinburgh presented at Choice 14A, presenting the opportunity to deliver a coordinated, high quality intervention alongside the other existing and emerging development sites, which makes use of existing high quality transport infrastructure on one of the key approaches into the city. Correspondingly, this representation endorses and identifies the suitability of the Saica site for development in the short term through a formal allocation: the foremost opportunity exists to accommodate residential development (including build to rent and retirement living) on the site, potentially incorporating mixed commercial uses (such as retail or hotel) (Choice 14A); the reuse of brownfield land within the urban area is clearly appropriate and supported, as is the identified ability of its Turnhouse Road site in Choices to contribute towards the identified housing targets in the forthcoming plan period, in contrast to many of the other brownfield sites identified. As such, it is recognised that greenfield release will also be required in order to meet such housing targets in a market facing manner, meaning a blended spatial approach (‘Option 3’) should be adopted by the Council (Choice 12A); it is considered to be key for sufficient flexibility to be allowed for on any identified housing capacities at the subject site to ensure commercial/market deliverability (Choice 14A); and, additional provision should be included within any policy requirement for 35% affordable housing to ensure development viability can be considered on a site by site basis, allowing flexibility to be applied in necessary circumstances to ensure the delivery of much needed market and affordable housing (Choice 11A). The gateway Saica site provides development certainty in the short term, actively meeting with key sustainable place making plan priorities. Correspondingly, the site should be given strong support via a flexible site specific allocation and inclusion within a West Edinburgh Development / Place Brief as a key part of the wider LDP Spatial Strategy in the forthcoming Proposed Edinburgh City Plan 2030, in accordance with the thrust of that presented at Choice 14A.

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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

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

Customer Ref:  Response Ref:

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Email

Response Type

On behalf of:

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

Choice 15 D

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

Short Response

Explanation

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On behalf of:

Supporting Info

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Choice 15 E

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

Short Response

Explanation

Choice 15 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



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Email

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

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

Customer Ref:  Response Ref:

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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? - Yes / No**

Short Response

Explanation

Choice **16 A5**

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

Short Response

Explanation

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

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On behalf of:

Supporting Info   
Email

Choice 16 C

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

Short Response

Explanation

Choice 16 E1

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

Short Response

Explanation

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

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On behalf of:

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Email

Choice 16 E3

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

Short Response

Explanation

Choice 16 E4

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

Short Response

Explanation

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

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Response Type   
On behalf of:

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Email

Choice 16 E6

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

Short Response

Explanation

Choice 16 E7

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

Short Response

Explanation

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

Customer Ref:  Response Ref:   
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Email

Choice **16 EX**

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

Short Response

Explanation

Choice **16 F**

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

Short Response

Explanation

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

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Name: Adam Richardson

Response Type: Agent / Consultant

On behalf of: Saica Group

Supporting Info: Yes

Email: arichardson@savills.com

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

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# Land at Turnhouse Road, Edinburgh

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Representation to City of Edinburgh Council Choices for City Plan 2030





# Land at Turnhouse Road, Edinburgh

Representation to City of Edinburgh Council Choices for City Plan 2030

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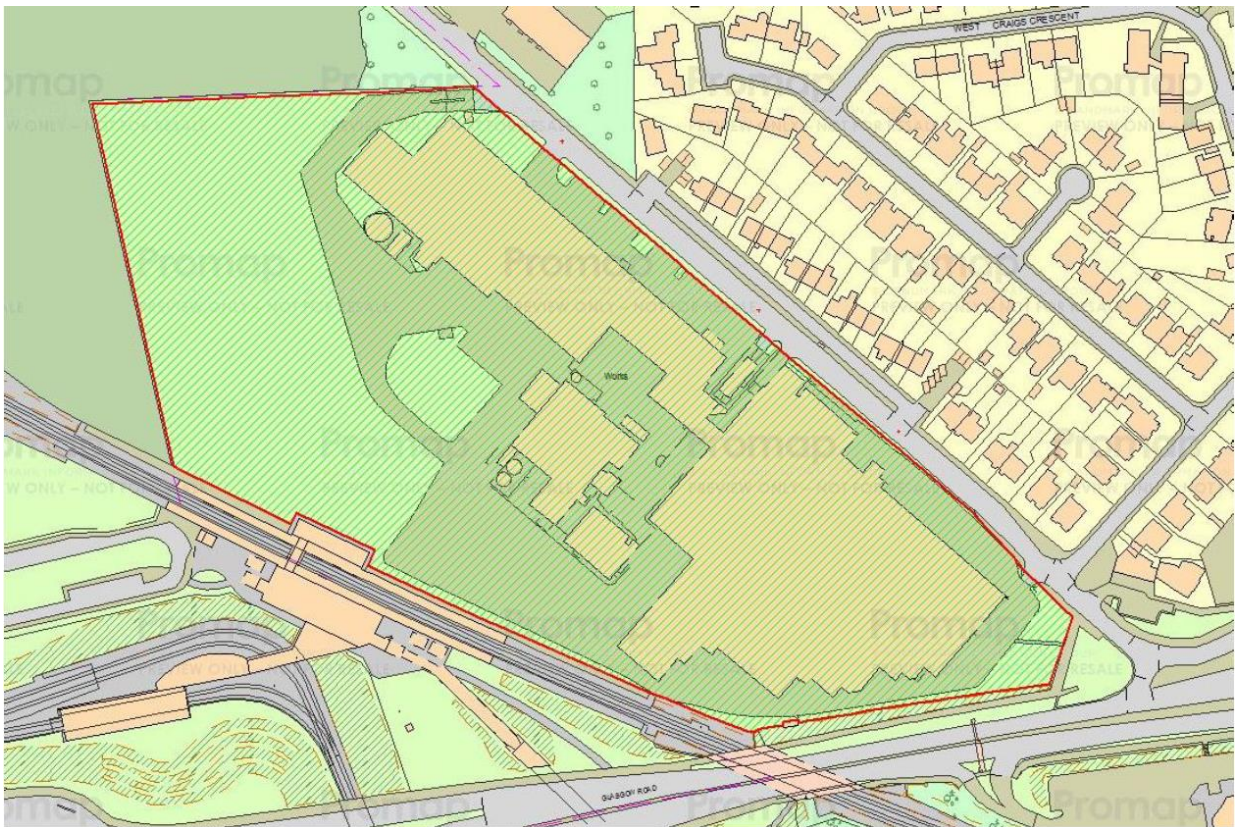
## 1. Introduction

- 1.1. Savills has been instructed by Saica Group to submit a representation on their behalf to the City of Edinburgh Council 'Choices for City Plan 2030' (*Choices*) consultation in relation to their landholding at Turnhouse Road, Edinburgh.
- 1.2. The land owned by Saica Group is identified by the City of Edinburgh Council in the *Choices* assessment as **Site Ref: 281 'Turnhouse Road (SAICA)'**, grouped in the broad category 'medium to high potential' for residential development.
- 1.3. The representation first establishes the newly changed commercial reality at the site, with Saica having recently announced the consolidation of their Edinburgh and Milngavie sites in a new location in Livingston. Correspondingly, they are due to relocate operations from their Turnhouse Road site by the end of 2021, creating a significant brownfield redevelopment opportunity.
- 1.4. A description of the site and its surrounding context is then provided, followed by an overview of the relevant planning policy context. Commentary is then provided in relation to potential new uses in the site redevelopment, and their overall acceptability in land use terms; Scottish Government site effectiveness criteria; the *Choices* site assessment; spatial approach considerations; and, affordable housing requirements. The final section then sets out our recommendations to the *Choices* consultation.
- 1.5. In summary, the representation endorses and identifies:
  - the suitability of the brownfield site to deliver several significant new uses in the short term; and,
  - the appropriateness of a correspondingly flexible site allocation and inclusion within a West Edinburgh Development / Place Brief as a key part of the wider LDP Spatial Strategy in the forthcoming Proposed Edinburgh City Plan 2030.

## 2. The Site and Surrounding Context

### The Site

- 2.1. The Saica Group landholding extends to 6.2 hectares (15.4 acres) and comprises an irregular shaped parcel of land with a substantial industrial (packaging) facility covering much of the site. The north-western portion of the site is covered by a large expanse of grassland.



- 2.2. Notwithstanding, this established use will have been relocated by the end of 2021, creating a prime, unoccupied brownfield site redevelopment opportunity.
- 2.3. As Saica Group noted in their 18<sup>th</sup> February 2020 press release, they have now purchased and will 'establish a new, purpose-built production facility located in Livingston, West Lothian within its packaging business division, Saica Pack.' This will result in a de-commissioning of current operations in Edinburgh and Milngavie to transition to this new, single site in Livingston.
- 2.4. As such, the site has not been previously promoted and will commence formal marketing in due course ahead of the identification of a preferred bidder.

# Land at Turnhouse Road, Edinburgh

Representation to City of Edinburgh Council Choices for City Plan 2030



## Site Location

- 2.5. The subject land is situated in West Edinburgh, bound on all sides by existing uses or emerging development. The site is bound to the north-east by Turnhouse Road, with West Craigs Industrial Estate and low-density suburban residential development beyond. To the east of the site lies Grosvenor Casino and a Shell petrol station. The south of the site is bounded by Glasgow Road, the trainline and Edinburgh Gateway Station, to the south-west. Beyond the trainline to the west is an area of land referred to as 'Crosswinds' which is subject to commercial development proposals (discussed below) and to the north-west lies open farmland which is currently subject to the Maybury residential led expansion of c. 2000 units (Ref: HSG 19) (discussed below). The Gyle Shopping Centre and Edinburgh Park lie to the south of Glasgow Road providing extensive retail and employment opportunities.
- 2.6. The site benefits from frontage to both Turnhouse Road and Glasgow Road. The property sits at the confluence of Maybury Road, Turnhouse Road and the main arterial route of Glasgow Road. The intersection is known as the Maybury Junction. Edinburgh City Centre lies 4.5 miles to the east, along Glasgow Road, the City of Edinburgh Bypass lies 0.25 miles to the west.
- 2.7. The City of Edinburgh Bypass provides access to the M8 and the wider motorway network. Edinburgh Airport is situated 2.25 miles to the west whilst the site is very well served by a multitude of bus routes that pass along Glasgow Road and Maybury Road.
- 2.8. The site is uniquely placed for rail and tram connections lying immediately on the eastern side of Edinburgh Gateway Station. This provides mainline rail services into Edinburgh and many destinations to the north including Inverness. Edinburgh Gateway Station also has a tram stop providing regular services to Edinburgh Airport and the city centre. The site is therefore extremely well located in relation to both road and public transport connections.
- 2.9. While Maybury Junction can become congested at peak times, there are proposals for significant upgrading involving redesigning the existing road network to alleviate these problems. The West Edinburgh Transport Appraisal (WETA) identifies a number of improvements which the Council are leading on and are expected to deliver in due course.
- 2.10. It should be noted that WETA outlines '*a southbound bus gate is proposed on Turnhouse Road to prevent traffic from the new West Craigs development accessing Maybury junction directly.*' Further discussions would be welcomed with the Council on this matter in early course.
- 2.11. Various transport infrastructure / junction improvements are also being delivered in association with the surrounding developments coming forward, as are summarised below.

## Surrounding Context

### *West Craigs*

- 2.12. To the north-west of the subject site lies the Maybury residential led expansion of c. 2,000 units (Ref: HSG 19).

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- 2.13. Planning permission for the first 1,400 units at Maybury was recently won at appeal (Ref: PPA-230-2207). A follow on detailed application (Ref: 19/05514/AMC) is currently awaiting determination in relation to the infrastructure works and landscape requirements for the wider site. Accordingly, the principal access roads (Turnhouse Road and Craigs Road will both be upgraded, as will the Craigs Road Junction and Turnhouse Road Junction (as noted above).
- 2.14. In addition, planning permission has also now been granted for land in the eastern section of the HSG19 land allocation (Ref: 16/05681/PPP) for 225-250 residential units with associated transport infrastructure, landscaping and open space. The Section 75 legal agreement was subsequently concluded in February 2020 which *inter alia* secured strategic junction improvements (Barnton Junction, Craigs Road Junction and Maybury Junction), Maybury Road pedestrian/cycle crossing and rail line crossing.
- 2.15. As part of the wider proposals, a link bridge is to be constructed connecting the housing development land with Edinburgh Gateway Station. Confirmation on the design and details of this bridge is currently subject to application ref: 20/01148/AMC. This bridge, once delivered, will provide improved access from the subject site to Edinburgh Gateway Station.
- 2.16. The subject site is ideally positioned to build upon and/or compliment the residential expansion taking place to the north-west at West Craigs (and beyond, as set out below).

### *Cammo*

- 2.17. Further north lies Cammo, which benefits from a housing land allocation (Ref: HSG20) in the existing Edinburgh LDP and has been advanced via planning permission ref: 18/01755/FUL, which in January 2020 approved the development of 655 residential units with ancillary mixed uses (community hub with nursery and multi-functional spaces), associated works and landscaping.
- 2.18. The associated S75 again *inter alia* secured a range of transport infrastructure contributions in relation to three strategic junction improvements (Barnton Junction, Craigs Road Junction and Maybury Junction) alongside bus infrastructure upgrades, cycle paths, a pedestrian bridge over Bughtlin Burn and East Craigs shared use paths.

### *Crosswinds Development*

- 2.19. As noted, this development proposal lies directly to the west of the subject land, beyond the trainline.
- 2.20. Crosswind Developments Ltd submitted a Proposal of Application Notice on 01 November 2019 in relation to the submission of a planning application for land to the north of Gogar Roundabout, including the former '12/30' Crosswind Runway, Edinburgh Airport. The proposed development comprises: *"Proposed mixed use development, including commercial floorspace (class 1 – shops; class 2 – financial and professional services; class 3 – restaurants and cafes; sui generis – including public houses; class 4 – business; class 6 – storage and distribution; class 7 – hotels; class 10 – non-residential institutions; and class 11 – Assembly and Leisure); residential floorspace (including affordable housing and flats); associated infrastructure; car parking; and landscaping."*
- 2.21. The proposed site extends to c. 29.3 hectares. No planning application has been submitted to date.

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- 2.22. In Issue 14C of *Choices*, the Council seeks to allocate this site and the Airport's contingency runway, the 'crosswinds runway', for the development of alternative uses next to the Edinburgh Gateway interchange. The site has been identified as a brownfield site located within the Urban Area (Ref: 406) suitable for development.

### 3. Planning Policy Context

- 3.1. The **Edinburgh Local Development Plan 2016** (LDP) is the adopted Plan currently governing land use planning decisions for the subject site.
- 3.2. The site has no specific, formal land use designation within the adopted LDP, falling within the wider Urban Area.
- 3.3. It is however recognised to be a '**Long Term Redevelopment Opportunity**' within the LDP Site Brief for the adjacent Maybury residential led expansion of c. 2,000 units (Ref: HSG 19). As noted, planning permission for the first 1,400 units at Maybury was recently won at appeal (Ref: PPA-230-2207).
- 3.4. Notwithstanding, the passage of time since the current LDP was adopted and the changing circumstances with the Saica Group operation – i.e. the de-commissioning of current operations in Edinburgh and Milngavie to transition to a single site in Livingston, with the Edinburgh operation ceasing by the end of 2021 and being decommissioned / vacated thereafter – mean that the 'Long Term Redevelopment Opportunity' identified within the LDP can be advanced in a shorter timeframe than originally envisaged by the LDP.
- 3.5. The site will therefore become a **spatially important, short-term brownfield gateway redevelopment opportunity** capable of being delivered within the first part of the forthcoming Edinburgh City Plan 2030, which will replace the current LDP and become the basis for guiding development in the City for the next 10 years in accordance with the Planning (Scotland) Act 2019. In doing so, an opportunity exists to realise the redevelopment potential initially identified within the adopted LDP in a significantly reduced timeframe.
- 3.6. Clearly, *Choices* is the first stage of this LDP replacement process with the Council identifying the subject site as having potential for large scale housing development (**Ref: 281**).



- 3.7. Further commentary on the emerging policy position and associated recommendations is provided within Sections 4 and 5 of this representation.

## 4. Development Assessment

- 4.1. This section assesses the site against the pertinent planning criteria, identifying that it comprises an attractive and logical redevelopment opportunity within the west of Edinburgh, being a brownfield site which will be available for development in the short term following the Saica Group operational relocation and consolidation in Livingston by the end of 2021.

### Proposed Land Use Suitability

- 4.2. The site is considered to be suitable for a **range of uses** including, but not limited to, **residential (including build to rent and retirement living), retail and hotel uses.**
- 4.3. The foremost opportunity exists to accommodate residential development on the site, potentially incorporating mixed commercial uses such as retail or hotel.
- 4.4. As established, the existing and emerging surrounding context means the site is highly suitable for redevelopment, the current Saica operation becoming incongruous with the majority of the wider area. Development of the site will complement the current expansion aspirations in the west of Edinburgh, enabling a high quality intervention along one of the key approaches into the city from the west.
- 4.5. In this regard, it is worth briefly noting the key criteria of the existing adopted Edinburgh LDP Policy Emp 9, which deals with the redevelopment of existing employment sites (as is the case here on account of Saica's long standing packing operation), all in accordance with standard amenity concerns and established land-use planning approaches.
- 4.6. Policy Emp 9 permits for alternative proposals on existing employment sites or premises provided that, *inter alia*, the introduction of non-employment uses will not prejudice or inhibit the activities of any nearby employment use; and, the proposal will contribute to the comprehensive regeneration and improvement of the wider area. The neighbouring land uses, including the significant Maybury residential land allocation, are clearly highly relevant and positive. While it is anticipated West Craigs Industrial Estate will continue to operate as stands for at least the next City Plan cycle, its continued operation would not be compromised by the redevelopment of the subject land.
- 4.7. All of the above uses would actively meet these key locational considerations.

### Effectiveness

- 4.8. PAN 2/2010 Planning Advice Note: Affordable Housing and Housing Land Audits (August 2010) identifies a criteria based approach for the release of further housing land through the consideration of planning applications. The effectiveness criteria are also useful to consider in the release of further sites for housing through the current local development plan review.
- 4.9. The effectiveness criteria contained in Paragraph 55 of the PAN are as follows:



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PAN 2/2010 Effectiveness Criteria	
<b>Ownership</b>	The site is within the control of Saica Group who are willing to release it for residential (or mixed use) development within the plan period.
<b>Physical</b>	There are no known insurmountable physical constraints relating to topography, access, flooding or ground conditions affecting the site that would make it unsuitable for residential (or mixed use) development. The previous height restrictions on development are no longer in place following the decommissioning of the Crosswinds runway. Noise from trains is considered to be wholly capable of being mitigated.
<b>Contamination</b>	Work undertaken to date on ground conditions does not identify any significant contamination issues.
<b>Deficit Funding</b>	No public funding is required to make residential (or mixed use) development on the site economically viable.
<b>Marketability</b>	Based upon preliminary work undertaken to date, Savills considers that there is significant demand for housing (and potentially mixed commercial and education uses) in this area from a range developers and special purchasers.
<b>Infrastructure</b>	There are no known abnormal infrastructure issues that require to be addressed to allow development of the site. The site has excellent access to local services and transport infrastructure. In terms of education, in accordance with the wider West Edinburgh expansion, a new primary school is already being delivered locally and there is a pre-existing requirement for a new secondary school site (already identified in the Council's Action Programme). Any residential development at the subject land would contribute proportionally alongside the other West Edinburgh expansion area sites.
<b>Land Use</b>	The site is located adjacent to an established and expanding residential area, though other uses are also present. Residential use of the site is therefore consistent with the wider pattern of land use in the area, while a number of other commercial and even education uses would also be appropriate in land use terms, making optimum use of the site's immediate connectivity to public transport and wider local services.

- 4.10. While the above criteria relate to the delivery of new housing development, they are also relevant to other commercial uses such as retail or hotel, for which there is known operator demand, alongside miscellaneous other uses such as education.

## Choices Site Assessment

- 4.11. The site was assessed by the Council as part of the City Plan 2030 Environmental Report and City Plan 2030 Housing Study undertaken to inform the *Choices* document.
- 4.12. Within the Environmental Report, the Council assess sites on the basis of biodiversity, population, soil, water, air & climate, material assets, heritage and landscape, as follows:

# Land at Turnhouse Road, Edinburgh

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Site Assessment: (281) Turnhouse Road (SAICA) (North East Locality)																													
SEA Objective	Biodiversity					Population				Soil	Water		Air & Climate				Material Assets		Heritage						Landscape				
Question	B1	B2	B3	B4	B5	P1	P2	P3	P4	S1	W1	W2	A1	A2	A3	A3	M1	M2	H1	H2	H3	H4	H5	H6	L1	L2	L3	L4	
Effect	-	-	-	-	-	-	-	-	?	✓	-	-	-	-	-	x	-	-	-	-	-	-	-	-	✓	-	-	-	
Comment	Existing use is an industrial unit. Site adjacent, residential, proposed housing site, tram depot to railway line and Edinburgh Gateway station. This could have positive impacts in terms of connectivity and negative impacts in terms of noise from trains. The site is within the catchment area for a river or burn, where there is known to be engineered alterations to the river (considered in bad/poor condition by SEPA) and therefore development of the site will need to take into account the reduced resilience of this river with regard to surface water. Site is potentially visible in one protect city view. Site visible in some local views. Weak pattern of development adjacent.																												
Mitigation	The design and layout of this site will have to include greater attenuation than standard practice to reduce the risk of surface water flooding and its impacts. Design of development should take advantage of access to new station but mitigate the impacts of noise from trains. A visual and townscape assessment is required to determine mass, scale, height and layout of development.																												

- 4.13. The Report acknowledges the site’s positive location in terms of connectivity with the adjacent Edinburgh Gateway Station which should be taken advantage of in any future design. Clearly, the site is very well located in relation to active and public transport provision which is in line with the aspirations set out by the Council in *Choices* which aim to make Edinburgh a more sustainable, active and connected city. Importantly, given the close proximity of the Edinburgh Gateway Station and various bus routes serving Glasgow Road and Maybury Road, it is considered the site can support significant travel by non-car modes of transport.
- 4.14. Despite the close proximity to Edinburgh Gateway Station, it is considered wholly achievable to successfully mitigate any noise impacts in the eventual site design.
- 4.15. The assessment notes a fairly standard requirement for a visual and townscape assessment to determine mass, scale, height and layout of any future development, noting the potential impact on a defined City View. Any future design would also need to ensure adequate mitigation in relation to flood risk from surface water was included through appropriate attenuation.
- 4.16. The assessment concludes that the site has medium to high potential for residential development and this, combined with the favourable landowner position whereby the site will become available for decommissioning and redevelopment by the end of 2021, makes the site a deliverable redevelopment opportunity in the short-term and certainly within the forthcoming plan period.
- 4.17. Within the Housing Study, the subject site ‘**Turnhouse Road (SAICA)**’ (Ref: 281) is located within ‘**Assessment Area 22 – West Edinburgh**’. It was identified as one of 142 brownfield sites within the Urban Area considered to have a **medium to high potential for housing delivery**.
- 4.18. The Housing Study analysed the 142 identified brownfield sites in terms of their suitability for residential development. This analysis reviewed determinants such as accessibility to services, accessibility to active travel and public transport, education provision, community infrastructure and flood risk, as follows:

Site Number	Area Name	Assessment Group Number	10 min walk to local convenience services	30 min walk to employment clusters	Access to wider cycle network	NCN/Quiet route 5 year intervention	Active Travel (overall)	Public Transport	Primary Capacity	Secondary Capacity	Community Infrastructure Overall	Flood Risk	Summary
281	Turnhouse Road (SAICA)	22	Green	Green	Green	Green	Green	Green	Red	Red	Yellow	Green	Yellow

# Land at Turnhouse Road, Edinburgh

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- 4.19. The Council's assessment confirmed that the subject site was suitable for residential development in 7 out of the 9 criteria with no significant flood risk concerns; excellent access to public transport; and, being within a 10 minute walk to local services.
- 4.20. Primary and Secondary Education Capacity were raised as concerns within the assessment, notwithstanding, as identified above, in accordance with the wider West Edinburgh expansion, a new primary school is already being delivered locally and there is an understood pre-existing requirement for a new secondary school site. Any residential development at the subject land would contribute proportionally alongside the other West Edinburgh expansion area sites.
- 4.21. Following this assessment, the site was identified as being suitable for medium density housing (100-175 units per hectare). Using this density combined with the site area (6.27 hectares), the Council have calculated both a 'low' and 'high' density scenario for housing delivery on the site as follows:

Site No:	Site name	Area (Ha)	Density	Low	High	Current Use
281	Turnhouse Road (Saica)	6.27	M	627	1097	Employment - Industrial

- 4.22. **This representation endorses the assessment of the Council and supports the site's inclusion as a residential allocation on a sustainable brownfield site in the Proposed Plan. However, concern remains that the housing capacities identified will dictate that a homogenous high rise apartment product be delivered on the site, out of step with commercial realities and what housebuilders would seek to deliver at this location on account of the corresponding limited market.**
- 4.23. **In this regard, it is important that any future LDP allocation / site development brief will provide for generous flexibility in delivery, noting also the potential to incorporate supplementary mixed uses. Further detailed assessment will be undertaken in due course following a competitive bidding process.**

### Choice 12A Building New Homes & Infrastructure / Spatial Delivery of New Housing

- 4.24. In considering matters more broadly, the Council outline in *Choices* that the forthcoming City Plan 2030 needs to allocate sufficient land to ensure the required homes can be delivered in Edinburgh within the Plan period. *Choices* therefore seeks to determine how many homes are required, who will deliver these homes and where we will deliver these homes in a sustainable manner.
- 4.25. In terms of how many homes are required, *Choices* sets out two options for a housing target, as follows:
- Preferred Option: 43,000 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HNDA 2 Wealth Distribution Scenarios less completions between 2012 and 2019.
  - 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.

- 4.26. It should be noted that both options fall some way short of meeting the identified housing need and demand in full. The Preferred Option would meet just 65% of identified housing need and demand in the HNDA 2 Wealth Distribution Scenario, once completions to 2019 are accounted for. 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.
- 4.27. In order to provide sufficient housing land to deliver the required number of houses, the Council sets out three options to deliver this land, as follows:
- Option 1 – Delivery by the Council and its partners within the Urban Area;
  - Option 2 – Delivery through market housing by releasing Greenfield land;
  - Option 3 – Use a blended approach of Option 1 and 2.
- 4.28. **The reuse of brownfield land within the urban area is supported, as is the identified ability of the site to contribute towards the identified housing targets. It is however recognised that greenfield release will also be required in order to meet housing targets in a market facing manner. As such, a blended approach (Option 3) will be required (Choice 12A).**
- 4.29. Indeed, the deliverability of a number of the brownfield sites identified in the accompanying City Plan 2030 Housing Study seems unlikely. There is a lack of information presented about the identified sites including whether the owner is potentially interested in selling or developing the site. The delivery of the identified brownfield lands relies on the operation of existing businesses or public sector organisations ceasing, with residential development creating a land value in excess of the current use value. Suitable incentives will also be required to ensure landowners are willing to sell. Consequently, the Council's Option 1 to deliver the necessary housing target in full on the identified brownfield sites seems unachievable.
- 4.30. Moreover, the lead in time for many of the sites identified, even if they are under single ownership and can be viably developed, will be significant. Reference is made to Compulsory Purchase Orders (CPO). However, the use of these powers can be complex, with such actions taking time to resolve on account of the varying associated obstacles to be addressed before purchase can be completed. The costs and logistics of running multiple contentious CPOs simultaneously will likely be prohibitive, ultimately impacting the delivery of many of the identified brownfield sites in *Choices* within the plan period.
- 4.31. It is reasonable to assume many of these sites have previously been considered by private developers and have not yet come forward.
- 4.32. The context for the subject site (Ref: 281) at Turnhouse Road is quite distinct to that outlined above in that Saica Group has already committed to relocate, consolidating their operations in Livingston. This will leave the site as a brownfield redevelopment opportunity with a landowner who is fully on board to ensure the development potential can be realised within the plan period.

- 4.33. **Recognition of the subject site as having residential development capability to deliver much needed housing is fully supported, with clear short term delivery potential.** It is considered that the site can make a good contribution towards the required housing targets identified by the Council within the 2019-2032 period with no insurmountable barriers to delivery. Notwithstanding, as identified above, the quantum that can be achieved on the site must be realistic in commercial terms, as per the site density commentary above at Paragraph 4.23.

### Affordable Housing

- 4.34. In relation to Issue 11A, it is recognised that affordability is a particular challenge in parts of Edinburgh compared with other cities and authorities in Scotland and that, in some instances, it is important to address this issue with revised policy requirements. Notwithstanding, a blanket requirement for all sites of 12 or more units to deliver an affordable housing provision of 35% may result in viability issues on certain schemes.
- 4.35. As such, it is considered that additional wording should be included within any new policy requirement for 35% affordable housing to ensure viability concerns can be fully considered on a site by site basis, if need be. This would allow flexibility to be applied in select circumstances to ensure the delivery of much need market and affordable housing.

## 5. Recommendations

- 5.1. This Representation has confirmed the newly changed commercial position at the subject land at **Turnhouse Road** – identified in *Choices* as **Site Ref: 281 ‘Turnhouse Road (SAICA)’** – with Saica Group having recently announced the consolidation of their Edinburgh and Milngavie sites in a new location in Livingston. Correspondingly, they are due to relocate operations from their Turnhouse Road site by the end of 2021, creating a certain, short term and significant brownfield gateway redevelopment opportunity.
- 5.2. The existing and emerging surrounding context means the site is highly suitable for redevelopment, with the Saica operation increasingly incongruous with the future direction of the wider area. Development of the site will complement the current expansion aspirations in West Edinburgh presented at **Choice 14A**, presenting the opportunity to deliver a coordinated, high quality intervention alongside the other existing and emerging development sites, which makes use of existing high quality transport infrastructure on one of the key approaches into the city.
- 5.3. Correspondingly, this representation **endorses and identifies** the suitability of the Saica site for development in the short term through a formal allocation:
- the foremost opportunity exists to accommodate **residential development (including build to rent and retirement living)** on the site, potentially incorporating **mixed commercial uses (such as retail or hotel) (Choice 14A)**;
  - the reuse of brownfield land within the urban area is clearly appropriate and supported, as is the identified ability of its Turnhouse Road site in *Choices* to contribute towards the identified housing targets in the forthcoming plan period, in contrast to many of the other brownfield sites identified. As such, it is recognised that greenfield release will also be required in order to meet such housing targets in a market facing manner, meaning a **blended spatial approach (‘Option 3’)** should be adopted by the Council (**Choice 12A**);
  - it is considered to be key for **sufficient flexibility to be allowed for on any identified housing capacities at the subject site to ensure commercial/market deliverability (Choice 14A)**; and,
  - additional provision should be included within any policy requirement for 35% **affordable housing** to ensure development viability can be considered on a site by site basis, allowing flexibility to be applied in necessary circumstances to ensure the delivery of much needed market and affordable housing (**Choice 11A**).
- 5.4. **In conclusion, the gateway Saica site provides development certainty in the short term, actively meeting with key sustainable place making plan priorities.**
- 5.5. **Correspondingly, the site should be given strong support via a flexible site specific allocation and inclusion within a West Edinburgh Development / Place Brief as a key part of the wider LDP Spatial Strategy in the forthcoming Proposed Edinburgh City Plan 2030, in accordance with the thrust of that presented at Choice 14A.**

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