

Customer Ref: 01729 Response Ref: ANON-KU2U-GP7Y-E
Name Rob Newton
Response Type Agent / Consultant
On behalf of: The Royal Bank of Scotland

Supporting Info Yes
Email robert.newton@avisonyoung.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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Choice 1 F

We want to identify specific sites for new allotments and food growing, both as part of new development sites and within open space in the urban area. Do you agree with this? - Yes / No

Short Response

Explanation

Choice 1 F

We want to identify specific sites for new allotments and food growing, both as part of new development sites and within open space in the urban area. Do you agree with this? - Upload (max size 3mb)

Short Response

Explanation

Choice 1 G

We want to identify space for additional cemetery provision, including the potential for green and woodland burials. Do you agree with this? - Yes / No

Short Response

Explanation

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Choice **1 H**

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

Short Response

Explanation

Choice **2 A**

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

Short Response

Explanation

Choice **2 B**

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

Short Response

Explanation

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Choice **2 C**

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

Short Response

Explanation

Choice **2 D**

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

Short Response

Explanation

Choice **3 A**

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

Short Response

Explanation

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Choice **4 A**

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

Short Response

Explanation

Choice **4 B**

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

Short Response

Explanation

Choice **5 A**

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

Short Response

Explanation

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Choice **5 B**

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

Short Response

Explanation

Choice **5 C**

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

Short Response

Explanation

Choice **5 D1**

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

Short Response

Explanation

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Choice 5 D2

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

Short Response

Explanation

Choice 5 E

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

Short Response

Explanation

Choice 6 A

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

Short Response

Explanation

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Choice **6 B**

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

Short Response

Explanation

Choice **7 A**

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

Short Response

Explanation

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

Choice **8 A**

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

Short Response

Explanation

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Choice **8 B**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

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Choice 9 A

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

Short Response

Explanation

Choice 9 B

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

Short Response

Explanation

Choice 10 A

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

Short Response

Explanation

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Choice **10 B**

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

Short Response

Explanation

Choice **10 C**

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

Short Response

Explanation

Choice **11 A**

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

Short Response

Explanation

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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 Not Answered

Explanation Not Answered

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Choice 12 A

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

Short Response: Option 3 (Blended)

Explanation

Land south of RBS Gogarburn and Gogar Mount House:Choice 12 'Building our new homes and infrastructure' Choice 12: A. How many new homes does Edinburgh need?We note the terms of the assessment carried out to determine Edinburgh's housing needs and that this uses the supply targets set out in Strategic Development Plan 1 ('SDP1').In our submission, this is a flawed approach. There should be no reliance on SDP1 for setting Housing Supply Targets, as SDP1 is now more than 5 years old and is therefore out-of-date (see Scottish Planning Policy paragraph 33). The MIR's reliance (to some extent) on SDP1 is therefore likely to mean that Edinburgh's Housing Target to 2032, as proposed, will be significantly short of where it should be. This casts serious doubt over the housing land supply options that follow, and with it, the requirement to ensure that sufficient land is being allocated to provide a 5-year effective supply (as required by SPP). In our submission, this lends further support to releasing additional land from the green belt for new housing.Returning to the council's assessment, HNDA2 is the most up-to-date robust and credible assessment of housing needs and demand. Given that SDP1 is out of date, we agree that HNDA2 should therefore be afforded an appropriate level of consideration in the preparation of City Plan 2030.Choice 12: B. Where will we deliver the homes in the most sustainable way? Whilst laudable, the council's proposed change that it, and its partners, would deliver all new homes solely within the urban area is unrealistic, in our opinion. This is further emphasised by our comments on the amount of new homes that Edinburgh actually needs, as explained above. In our submission, it is inevitable that 'Option 3 – A blended approach' of urban area and greenfield land will be a more realistic proposition in this regard.Pursuant to this, the MIR already includes land at Norton Park (to the west of RBS Gogarburn) as a potential housing site to be released from the green belt and Choice 14 is devoted specifically to delivering development within West Edinburgh. Combined with the emerging development context within west Edinburgh and south of the A8 (as summarised at paragraph 3.9 above), RBS believes there is scope to assess further its land to the south of RBS Gogarburn and at Gogar Mount House, and the respective prospects for further green belt release to help deliver the objectives of Choices 12 and 14. For clarification, this could extend to including the land outlined in red within the plan at paragraph 3.16 of the representation document. The principle of growth within the city's 'Strategic Development Areas' through green belt releases has already been established at West Edinburgh and other SDA's. We believe that it is appropriate timing and opportunity for the same approach to be taken to our client's land above. In view of our comments earlier on increasing the housing allocation for West Edinburgh, RBS's land to the south of the A8 offers the potential to promote sustainable mixed use development and high quality place-making. Retaining this land within the green belt would not deliver any green belt objectives as defined in Scottish Planning Policy. This may be a longer-term green belt release in this regard.In view of the recently approved planning permission at RBS Gogarburn for phase 2 development, land uses could include a mix of business related uses, a mix of residential types (including care home and hotel), together with other ancillary uses. All of these potential uses would be well suited to the location in question, particularly in light of the considerations noted below.The land in question is uniquely situated to be served by existing public transport infrastructure including the tram, bus (with park and ride) and rail. As set out within Choice 14, the Council wants development allocations in City Plan 2030 to support the best use of existing public transport infrastructure in West Edinburgh and to accommodate a mix of uses to support inclusive, sustainable growth. In our submission, this must elevate

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the credentials of the land in question. In our view, the land in question could be sensitively developed without affecting the wider landscape setting of the city. Views to the site from the wider landscape are predominantly contained by intact woodland belts and development of the site would not impact upon views experienced by road users on the A8 and City bypass, both key approaches to the city, due to existing tree screening. The southern boundary of the A8 at Gogar Mount, the golf course, Gogarburn and Gogarbank are particularly well screened by existing tree planting. While the site is more visible from roads to the south, these roads do not constitute key approaches to the city and are more minor in nature. The terrain of the site also helps to conceal large parts of the site from such locations. Views to parts of the site from the train line are screened by existing tree belts, and further tree planting could also help in this regard. In light of the above considerations, it is considered that the RBS land performs particularly well against key criteria used to assess the credentials of candidate sites.

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

Choice **12 B2**

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

Short Response

Explanation

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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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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

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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

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Yes

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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

No

Explanation

Choice 12 C

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

Short Response

No

Explanation

Choice 12 C

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

Short Response

No

Explanation

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Choice 12 D

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

Short Response: No

Explanation

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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 RBS Gogarburn is allocated as a 'Special Economic Area' ('Emp 7') in the current adopted LDP. As set out in the LDP, the main purpose for this allocation is to develop office development in a high quality landscape setting and to a great extent, this has already been delivered. Part of the site remains undeveloped to the south of the current built operations (as acknowledged within the LDP at page 21) and planning permission was recently granted (reference 18/07851/FUL) that will allow further phases of office and ancillary development to be delivered on the southern part of this allocation. The original RBS Gogarburn masterplan showed that this part of the site alone could deliver further office development of circa 14,000 sqm. An extract of the proposals map highlighting the Emp 7 allocation site is reproduced in the representation document (blue line and cross-hatching). It is encouraging to note that Choice 13 identifies RBS Gogarburn as an area of support for inclusive growth, innovation, universities and culture. Pursuant to this, RBS supports the aims of supporting social enterprises, start-up, culture and tourism, innovation and learning, and the low carbon sector. Choice 16 notes the requirement to ensure that City Plan 2030 delivers enough business floorspace to meet the City's demand. It notes that access to public transport will be a strong driver of demand and RBS Gogarburn is of course already served by the Edinburgh tram, as well as local bus services and a train station at Edinburgh Gateway; the latter also serving as an interchange with the tram. In terms of existing business space at RBS Gogarburn, it is also worth noting that a 'single user clause' fell away back in 2015 thereby offering further flexibility in the utilisation of this space. Against this context, there are strong grounds to ensure that RBS Gogarburn (as identified above) should therefore continue to be afforded relevant status as a 'strategic office location' (adopting the terminology in Choices) and we would welcome the opportunity of discussing an appropriate site allocation with Council Officers in due course. RBS Gogarburn – green belt exclusions: There is no specific 'choice' that addresses green belt boundaries within the city. We assume that such matters will be given due consideration as part of planning for various land uses in preparing a Proposed Plan. In this regard, we believe there is a credible case for excluding existing RBS operations at Gogarburn from the green belt as set out below. The extent of this exclusion should comprise at least the entire 'Special Economic Area' 'Emp 7' allocation afforded to RBS Gogarburn in the adopted Local Development Plan ('LDP') and as identified in the proposals map extract above. As set out in the adopted LDP, the main purpose for this allocation is to develop office development in a high quality landscape setting and to a great extent, this has already been delivered. As acknowledged within the LDP, part of the site remains undeveloped to the south of the current built operations and planning permission was recently granted that will allow further phases of office and ancillary development to be delivered. It is also relevant to consider the surrounding context and how the character of west Edinburgh is expected to continue changing dramatically over the course of the City Plan period (to 2030) and beyond. Land immediately to the north of the A8 has already been removed from the green belt for mixed use development known as the International Business Gateway ('IBG'). The Council is supporting further significant land release for mixed use development to the east of the IBG known as the 'Crosswinds' development. Scottish Ministers have resolved to grant planning permission in principle for a major housing development on green belt land to the immediate east of RBS Gogarburn, known as 'East of Millburn Tower' (part of the Garden District masterplan). Land to the west of RBS Gogarburn and

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referred to as 'Norton Park' has been assessed by the council as suitable for housing development in the Choices document and is identified as a potential site to be released from the green belt. All of these changes are also encapsulated in Choice 14 which is dedicated to 'Delivering West Edinburgh' and which makes reference to policy Emp 7 being under revision. Against this context and as part of this review, there is no justification for continuing to retain this land within the green belt and such retention would introduce unnecessary confusion in our opinion.

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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 RBS Gogarburn:RBS Gogarburn is allocated as a ‘Special Economic Area’ (‘Emp 7’) in the current adopted LDP. As set out in the LDP, the main purpose for this allocation is to develop office development in a high quality landscape setting and to a great extent, this has already been delivered. Part of the site remains undeveloped to the south of the current built operations (as acknowledged within the LDP at page 21) and planning permission was recently granted (reference 18/07851/FUL) that will allow further phases of office and ancillary development to be delivered on the southern part of this allocation. The original RBS Gogarburn masterplan showed that this part of the site alone could deliver further office development of circa 14,000 sqm. An extract of the proposals map highlighting the Emp 7 allocation site is reproduced in the representation document (blue line and cross-hatching).It is encouraging to note that Choice 13 identifies RBS Gogarburn as an area of support for inclusive growth, innovation, universities and culture. Pursuant to this, RBS supports the aims of supporting social enterprises, start-up, culture and tourism, innovation and learning, and the low carbon sector.Choice 16 notes the requirement to ensure that City Plan 2030 delivers enough business floorspace to meet the City’s demand. It notes that access to public transport will be a strong driver of demand and RBS Gogarburn is of course already served by the Edinburgh tram, as well as local bus services and a train station at Edinburgh Gateway; the latter also serving as an interchange with the tram. In terms of existing business space at RBS Gogarburn, it is also worth noting that a ‘single user clause’ fell away back in 2015 thereby offering further flexibility in the utilisation of this space.Against this context, there are strong grounds to ensure that RBS Gogarburn (as identified above) should therefore continue to be afforded relevant status as a ‘strategic office location’ (adopting the terminology in Choices) and we would welcome the opportunity of discussing an appropriate site allocation with Council Officers in due course.RBS Gogarburn – green belt exclusions:There is no specific ‘choice’ that addresses green belt boundaries within the city. We assume that such matters will be given due consideration as part of planning for various land uses in preparing a Proposed Plan. In this regard, we believe there is a credible case for excluding existing RBS operations at Gogarburn from the green belt as set out below.The extent of this exclusion should comprise at least the entire ‘Special Economic Area’ ‘Emp 7’ allocation afforded to RBS Gogarburn in the adopted Local Development Plan (‘LDP’) and as identified in the proposals map extract above. As set out in the adopted LDP, the main purpose for this allocation is to develop office development in a high quality landscape setting and to a great extent, this has already been delivered. As acknowledged within the LDP, part of the site remains undeveloped to the south of the current built operations and planning permission was recently granted that will allow further phases of office and ancillary development to be delivered. It is also relevant to consider the surrounding context and how the character of west Edinburgh is expected to continue changing dramatically over the course of the City Plan period (to 2030) and beyond. Land immediately to the north of the A8 has already been removed from the green belt for mixed use development known as the International Business Gateway (‘IBG’). The Council is supporting further significant land release for mixed use development to the east of the IBG known as the ‘Crosswinds’ development. Scottish Ministers have resolved to grant planning permission in principle for a major housing development on green belt land to the

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immediate east of RBS Gogarburn, known as 'East of Millburn Tower' (part of the Garden District masterplan). Land to the west of RBS Gogarburn and referred to as 'Norton Park' has been assessed by the council as suitable for housing development in the Choices document and is identified as a potential site to be released from the green belt. All of these changes are also encapsulated in Choice 14 which is dedicated to 'Delivering West Edinburgh' and which makes reference to policy Emp 7 being under revision. Against this context and as part of this review, there is no justification for continuing to retain this land within the green belt and such retention would introduce unnecessary confusion in our opinion. Land south of RBS Gogarburn and Gogar Mount House: We note the terms of the assessment carried out to determine Edinburgh's housing needs and that this uses the supply targets set out in Strategic Development Plan 1 ('SDP1'). In our submission, this is a flawed approach. There should be no reliance on SDP1 for setting Housing Supply Targets, as SDP1 is now more than 5 years old and is therefore out-of-date (see Scottish Planning Policy paragraph 33). The MIR's reliance (to some extent) on SDP1 is therefore likely to mean that Edinburgh's Housing Target to 2032, as proposed, will be significantly short of where it should be. This casts serious doubt over the housing land supply options that follow, and with it, the requirement to ensure that sufficient land is being allocated to provide a 5-year effective supply (as required by SPP). In our submission, this lends further support to releasing additional land from the green belt for new housing. Returning to the council's assessment, HNDA2 is the most up-to-date robust and credible assessment of housing needs and demand. Given that SDP1 is out of date, we agree that HNDA2 should therefore be afforded an appropriate level of consideration in the preparation of City Plan 2030. Whilst laudable, the council's proposed change that it, and its partners, would deliver all new homes solely within the urban area is unrealistic, in our opinion. This is further emphasised by our comments on the amount of new homes that Edinburgh actually needs, as explained above. In our submission, it is inevitable that 'Option 3 – A blended approach' of urban area and greenfield land will be a more realistic proposition in this regard. Pursuant to this, the MIR already includes land at Norton Park (to the west of RBS Gogarburn) as a potential housing site to be released from the green belt and Choice 14 is devoted specifically to delivering development within West Edinburgh. Combined with the emerging development context within west Edinburgh and south of the A8 (as summarised at paragraph 3.9 above), RBS believes there is scope to assess further its land to the south of RBS Gogarburn and at Gogar Mount House, and the respective prospects for further green belt release to help deliver the objectives of Choices 12 and 14. For clarification, this could extend to including the land outlined in red within the plan at paragraph 3.16 of the representation document. The principle of growth within the city's 'Strategic Development Areas' through green belt releases has already been established at West Edinburgh and other SDA's. We believe that it is appropriate timing and opportunity for the same approach to be taken to our client's land above. In view of our comments earlier on increasing the housing allocation for West Edinburgh, RBS's land to the south of the A8 offers the potential to promote sustainable mixed use development and high quality place-making. Retaining this land within the green belt would not deliver any green belt objectives as defined in Scottish Planning Policy. This may be a longer-term green belt release in this regard. In view of the recently approved planning permission at RBS Gogarburn for phase 2 development, land uses could include a mix of business related uses, a mix of residential types (including care home and hotel), together with other ancillary uses. All of these potential uses would be well suited to the location in question, particularly in light of the considerations noted below. The land in question is uniquely situated to be served by existing public transport infrastructure including the tram, bus (with park and ride) and rail. As set out within Choice 14, the Council wants development allocations in City Plan 2030 to support the best use of existing public transport infrastructure in West Edinburgh and to accommodate a mix of uses to support inclusive, sustainable growth. In our submission, this must elevate the credentials of the land in question. In our view, the land in question could be sensitively developed without affecting the wider landscape setting of the city. Views to the site from the wider landscape are predominantly contained by intact woodland belts and development of the site would not impact upon views experienced by road users on the A8 and City bypass, both key approaches to the city, due to existing tree screening. The southern boundary of the A8 at Gogar Mount, the golf course, Gogarburn and Gogarbark are particularly well screened by

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

existing tree planting. While the site is more visible from roads to the south, these roads do not constitute key approaches to the city and are more minor in nature. The terrain of the site also helps to conceal large parts of the site from such locations. Views to parts of the site from the train line are screened by existing tree belts, and further tree planting could also help in this regard. In light of the above considerations, it is considered that the RBS land performs particularly well against key criteria used to assess the credentials of candidate sites.

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

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Choice 15 A

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

Short Response

Explanation

Choice 15 B

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

Short Response

Explanation

Choice 15 C

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

Short Response

Explanation

Customer Ref: Response Ref:

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Supporting Info

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Choice 15 D

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

Short Response

Explanation

Choice 15 E

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

Short Response

Explanation

Choice 15 G

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

Short Response

Explanation

Customer Ref: 01729 Response Ref: ANON-KU2U-GP7Y-E
Name: Rob Newton
Response Type: Agent / Consultant
On behalf of: The Royal Bank of Scotland

Supporting Info: Yes
Email: robert.newton@avisonyoung.com

Choice 16 A1

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

Short Response: Not Answered

Explanation

RBS Gogarburn is allocated as a 'Special Economic Area' ('Emp 7') in the current adopted LDP. As set out in the LDP, the main purpose for this allocation is to develop office development in a high quality landscape setting and to a great extent, this has already been delivered. Part of the site remains undeveloped to the south of the current built operations (as acknowledged within the LDP at page 21) and planning permission was recently granted (reference 18/07851/FUL) that will allow further phases of office and ancillary development to be delivered on the southern part of this allocation. The original RBS Gogarburn masterplan showed that this part of the site alone could deliver further office development of circa 14,000 sqm. An extract of the proposals map highlighting the Emp 7 allocation site is reproduced in the representation document (blue line and cross-hatching). It is encouraging to note that Choice 13 identifies RBS Gogarburn as an area of support for inclusive growth, innovation, universities and culture. Pursuant to this, RBS supports the aims of supporting social enterprises, start-up, culture and tourism, innovation and learning, and the low carbon sector. Choice 16 notes the requirement to ensure that City Plan 2030 delivers enough business floorspace to meet the City's demand. It notes that access to public transport will be a strong driver of demand and RBS Gogarburn is of course already served by the Edinburgh tram, as well as local bus services and a train station at Edinburgh Gateway; the latter also serving as an interchange with the tram. In terms of existing business space at RBS Gogarburn, it is also worth noting that a 'single user clause' fell away back in 2015 thereby offering further flexibility in the utilisation of this space. Against this context, there are strong grounds to ensure that RBS Gogarburn (as identified above) should therefore continue to be afforded relevant status as a 'strategic office location' (adopting the terminology in Choices) and we would welcome the opportunity of discussing an appropriate site allocation with Council Officers in due course. RBS Gogarburn – green belt exclusions: There is no specific 'choice' that addresses green belt boundaries within the city. We assume that such matters will be given due consideration as part of planning for various land uses in preparing a Proposed Plan. In this regard, we believe there is a credible case for excluding existing RBS operations at Gogarburn from the green belt as set out below. The extent of this exclusion should comprise at least the entire 'Special Economic Area' 'Emp 7' allocation afforded to RBS Gogarburn in the adopted Local Development Plan ('LDP') and as identified in the proposals map extract above. As set out in the adopted LDP, the main purpose for this allocation is to develop office development in a high quality landscape setting and to a great extent, this has already been delivered. As acknowledged within the LDP, part of the site remains undeveloped to the south of the current built operations and planning permission was recently granted that will allow further phases of office and ancillary development to be delivered. It is also relevant to consider the surrounding context and how the character of west Edinburgh is expected to continue changing dramatically over the course of the City Plan period (to 2030) and beyond. Land immediately to the north of the A8 has already been removed from the green belt for mixed use development known as the International Business Gateway ('IBG'). The Council is supporting further significant land release for mixed use development to the east of the IBG known as the 'Crosswinds' development. Scottish Ministers have resolved to grant planning permission in principle for a major housing development on green belt land to the immediate east of RBS Gogarburn, known as 'East of Millburn Tower' (part of the Garden District masterplan). Land to the west of RBS Gogarburn and

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Name

Email

Response Type

On behalf of:

referred to as 'Norton Park' has been assessed by the council as suitable for housing development in the Choices document and is identified as a potential site to be released from the green belt. All of these changes are also encapsulated in Choice 14 which is dedicated to 'Delivering West Edinburgh' and which makes reference to policy Emp 7 being under revision. Against this context and as part of this review, there is no justification for continuing to retain this land within the green belt and such retention would introduce unnecessary confusion in our opinion.

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 A4

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

Short Response

Explanation

Choice 16 A5

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

Short Response

Explanation

Choice 16 A5

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

Short Response

Explanation

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

Supporting Info

Email

Choice 16 B

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

Short Response

Explanation

Choice 16 C

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

Short Response

Explanation

Choice 16 E1

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 E2

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

Short Response

Explanation

Choice 16 E3

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

Short Response

Explanation

Choice 16 E4

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

Short Response

Explanation

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

Supporting Info

Email

Choice 16 E5

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

Short Response

Explanation

Choice 16 E6

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

Short Response

Explanation

Choice 16 E7

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

Short Response

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 16 E8

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

Short Response

Explanation

Choice 16 EX

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

Short Response

Explanation

Choice 16 F

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

Short Response

Explanation

Customer Ref: 01729 Response Ref: ANON-KU2U-GP7Y-E
Name: Rob Newton
Response Type: Agent / Consultant
On behalf of: The Royal Bank of Scotland

Supporting Info: Yes
Email: robert.newton@avisonyoung.com

Choice 16 G

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

Short Response: Not Answered

Explanation: Not Answered

Choice 16 H

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

Short Response: Not Answered

Explanation: Not Answered

Representations to 'Choices for City Plan 2030'

On behalf of The Royal Bank of Scotland

April 2020

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3.	Response to Choices.....	3

Prepared By: Rob Newton
Status: Final
Draft Date: April 2020

1. Introduction

- 1.1 These representations to the Main Issues Report ('MIR') stage of the plan preparation process, namely 'Choices for City Plan 2030', have been prepared by Avison Young on behalf of The Royal Bank of Scotland. They relate specifically to land in their control at RBS Gogarburn including adjacent land to the south, and separately, the Gogar Mount House estate to the west of this.
- 1.2 We respectfully request that these representations are taken into account by City of Edinburgh Council ('the council') as the LDP process progresses and in particular, in advance of preparing a Proposed Plan. RBS would therefore welcome further dialogue with council Officers regarding the representations that follow.

2. RBS in Edinburgh

- 2.1 Edinburgh is the UK's second financial centre after London and ranked as Europe's fourth by equity assets. In world terms, it ranks ahead of many European competitors in the latest Global Financial Centres Index. RBS has, and continues to make a significant contribution toward maintaining these headline achievements.
- 2.2 It remains the largest financial services sector company headquartered in the city (source: CEC, Edinburgh by Numbers 2011/12), employing some 8,200 people. This also puts RBS as the fifth highest ranked employer in the city and the second highest of all private sector companies.
- 2.3 As a significant employer within the city, RBS is also helping to maintain Edinburgh's reputation for retaining a broad talent pool within the financial services sector. This pool is typically multi-skilled, exceptionally well qualified and with a high proportion of graduates, all of which further contribute toward maintaining its position as the largest industry sector, as measured by Gross Value Added (source: Edinburgh by Numbers 2011/12).
- 2.4 Together with other related companies in the city, RBS also helps promote the diverse financial services sector offer, which collectively is credited with attracting significant inward investment, including from a large number of foreign owned companies having operations in Edinburgh.
- 2.5 Against this context, RBS welcomes the opportunity to participate in the preparation of the LDP and acknowledges its importance of helping guide the growth of the city, future development proposals and investment decisions in particular.

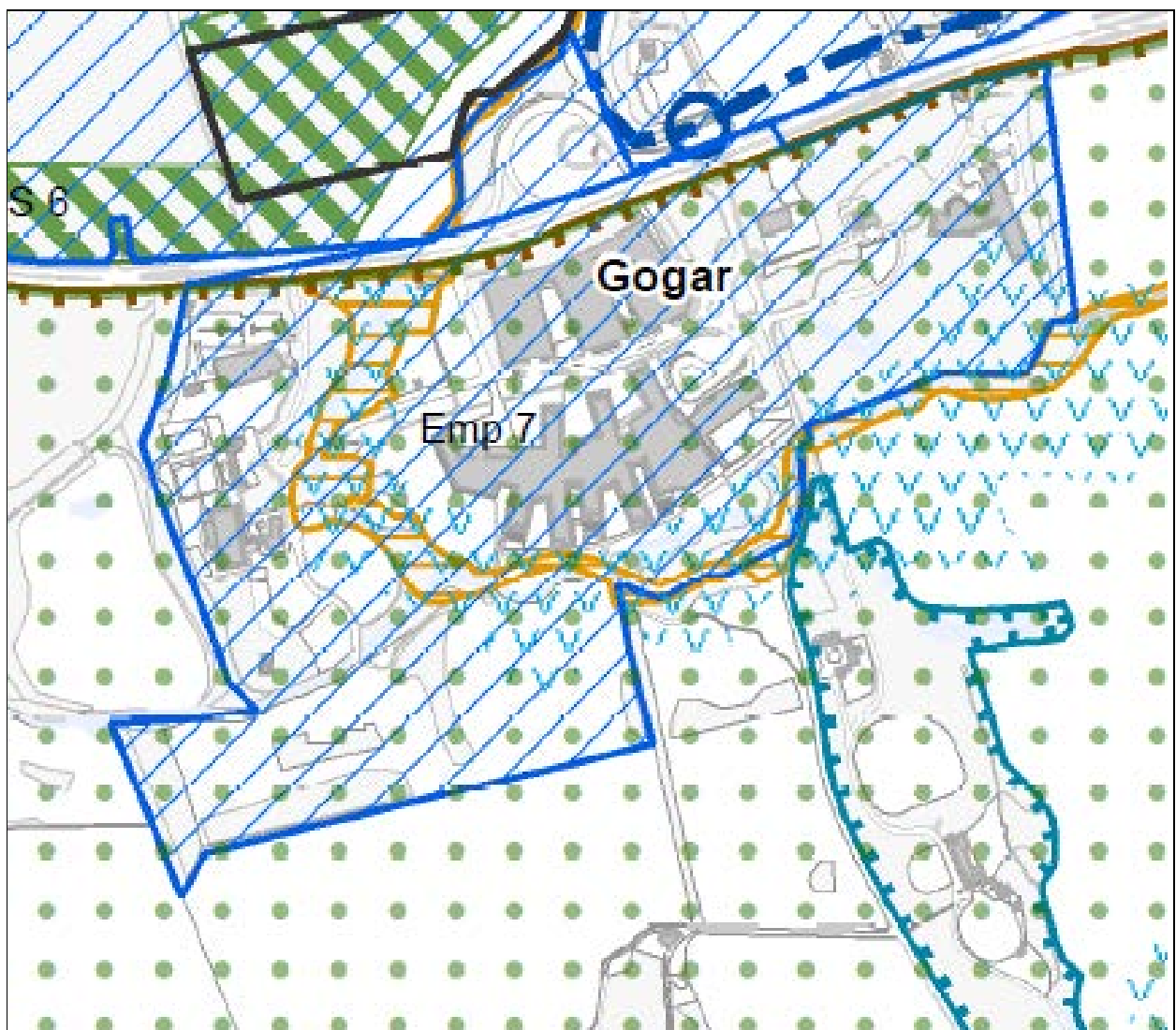
3. Response to Choices

RBS Gogarburn:

Choice 13 'Supporting inclusive growth, innovation, universities & culture'

Choice 16 'strategic office locations' - RBS Gogarburn

- 3.1 RBS Gogarburn is allocated as a 'Special Economic Area' ('Emp 7') in the current adopted LDP. As set out in the LDP, the main purpose for this allocation is to develop office development in a high quality landscape setting and to a great extent, this has already been delivered. Part of the site remains undeveloped to the south of the current built operations (as acknowledged within the LDP at page 21) and planning permission was recently granted (reference 18/07851/FUL) that will allow further phases of office and ancillary development to be delivered on the southern part of this allocation. The original RBS Gogarburn masterplan showed that this part of the site alone could deliver further office development of circa 14,000 sqm. An extract of the proposals map highlighting the Emp 7 allocation site is reproduced below (blue line and cross-hatching).



- 3.2 It is encouraging to note that Choice 13 identifies RBS Gogarburn as an area of support for inclusive growth, innovation, universities and culture. Pursuant to this, RBS supports the aims of supporting social enterprises, start-up, culture and tourism, innovation and learning, and the low carbon sector.
- 3.3 Choice 16 notes the requirement to ensure that City Plan 2030 delivers enough business floorspace to meet the City's demand. It notes that access to public transport will be a strong driver of demand and RBS Gogarburn is of course already served by the Edinburgh tram, as well as local bus services and a train station at Edinburgh Gateway; the latter also serving as an interchange with the tram.
- 3.4 In terms of existing business space at RBS Gogarburn, it is also worth noting that a 'single user clause' fell away back in 2015 thereby offering further flexibility in the utilisation of this space.
- 3.5 Against this context, there are strong grounds to ensure that RBS Gogarburn (as identified above) should therefore continue to be afforded relevant status as a 'strategic office location' (adopting the terminology in Choices) and we would welcome the opportunity of discussing an appropriate site allocation with Council Officers in due course.

RBS Gogarburn – green belt exclusions

- 3.6 There is no specific 'choice' that addresses green belt boundaries within the city. We assume that such matters will be given due consideration as part of planning for various land uses in preparing a Proposed Plan. In this regard, we believe there is a credible case for excluding existing RBS operations at Gogarburn from the green belt as set out below.
- 3.7 The extent of this exclusion should comprise at least the entire 'Special Economic Area' 'Emp 7' allocation afforded to RBS Gogarburn in the adopted Local Development Plan ('LDP') and as identified in the proposals map extract above.
- 3.8 As set out in the adopted LDP, the main purpose for this allocation is to develop office development in a high quality landscape setting and to a great extent, this has already been delivered. As acknowledged within the LDP, part of the site remains undeveloped to the south of the current built operations and planning permission was recently granted that will allow further phases of office and ancillary development to be delivered.
- 3.9 It is also relevant to consider the surrounding context and how the character of west Edinburgh is expected to continue changing dramatically over the course of the City Plan period (to 2030) and beyond. Land immediately to the north of the A8 has already been removed from the green belt for mixed use development known as the International Business Gateway ('IBG'). The Council is supporting further significant land release for mixed use development to the east of the IBG known as the 'Crosswinds' development. Scottish Ministers have resolved to grant planning permission in principle for a major housing development on green belt land to the immediate east of RBS Gogarburn, known as 'East of Millburn Tower' (part of the Garden District masterplan). Land to the west of RBS Gogarburn and referred to as 'Norton Park' has been assessed by the council as suitable for housing development in the Choices document and is identified as a potential site to be released from the green belt. All of these changes are also encapsulated in Choice 14 which is dedicated to 'Delivering West Edinburgh' and which makes reference to policy Emp 7 being under revision.

- 3.10 Against this context and as part of this review, there is no justification for continuing to retain this land within the green belt and such retention would introduce unnecessary confusion in our opinion.

Land south of RBS Gogarburn and Gogar Mount House:

Choice 12 'Building our new homes and infrastructure'

Choice 14 'Delivering West Edinburgh'

Choice 12: A. How many new homes does Edinburgh need?

- 3.11 We note the terms of the assessment carried out to determine Edinburgh's housing needs and that this uses the supply targets set out in Strategic Development Plan 1 ('SDP1').
- 3.12 In our submission, this is a flawed approach. There should be no reliance on SDP1 for setting Housing Supply Targets, as SDP1 is now more than 5 years old and is therefore out-of-date (see Scottish Planning Policy paragraph 33).
- 3.13 The MIR's reliance (to some extent) on SDP1 is therefore likely to mean that Edinburgh's Housing Target to 2032, as proposed, will be significantly short of where it should be. This casts serious doubt over the housing land supply options that follow, and with it, the requirement to ensure that sufficient land is being allocated to provide a 5-year effective supply (as required by SPP). In our submission, this lends further support to releasing additional land from the green belt for new housing.
- 3.14 Returning to the council's assessment, HNDA2 is the most up-to-date robust and credible assessment of housing needs and demand. Given that SDP1 is out of date, we agree that HNDA2 should therefore be afforded an appropriate level of consideration in the preparation of City Plan 2030.

Choice 12: B. Where will we deliver the homes in the most sustainable way?

- 3.15 Whilst laudable, the council's proposed change that it, and its partners, would deliver all new homes solely within the urban area is unrealistic, in our opinion. This is further emphasised by our comments on the amount of new homes that Edinburgh actually needs, as explained above. In our submission, it is inevitable that 'Option 3 – A blended approach' of urban area and greenfield land will be a more realistic proposition in this regard.
- 3.16 Pursuant to this, the MIR already includes land at Norton Park (to the west of RBS Gogarburn) as a potential housing site to be released from the green belt and Choice 14 is devoted specifically to delivering development within West Edinburgh. Combined with the emerging development context within west Edinburgh and south of the A8 (as summarised at paragraph 3.9 above), RBS believes there is scope to assess further its land to the south of RBS Gogarburn and at Gogar Mount House, and the respective prospects for further green belt release to help deliver the objectives of Choices 12 and 14. For clarification, this could extend to including the land outlined in red below.

boundary of the A8 at Gogar Mount, the golf course, Gogarburn and Gogarbank are particularly well screened by existing tree planting.

- 3.21 While the site is more visible from roads to the south, these roads do not constitute key approaches to the city and are more minor in nature. The terrain of the site also helps to conceal large parts of the site from such locations. Views to parts of the site from the train line are screened by existing tree belts, and further tree planting could also help in this regard.
- 3.22 In light of the above considerations, it is considered that the RBS land performs particularly well against key criteria used to assess the credentials of candidate sites.
- 3.23 Overall, we look forward to discussing the various representations presented within this submission with the council in due course and would invite you to contact Rob Newton (0131 4696019) at Avison Young in this regard.

Contact Details

Enquiries

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