

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

Supporting Info
Email

Choice 1 A

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

Short Response

Explanation A new policy in the forthcoming LDP which takes account of connecting places, parks and greenspaces is supported by our clients. These contribute to both health and well-being. Encouragement for walking, cycling and sport are generally supported. In planning for any development, our client recognises the inclusion of green and blue infrastructure, providing appropriate open space, trees and utilising SUD's for their aquatic/ecological habitats and bio-diversity.

Choice 1 B

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

Short Response

Explanation

Customer Ref: Response Ref:

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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

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Choice 1 E

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

Short Response

Explanation As part of a masterplanned approach the development of our clients site appropriate open space can be provided. Our clients would support a collaborative approach to the development of the two sites to ensure appropriate green infrastructure is provided. The requirement for providing open space in any new development needs to be proportionate and deliver spaces that will be used by future residents. Small unmaintained spaces in new developments are often underutilised and lead to an inefficient use of land. We would not support against a blanket 'extra-large green space standard' of five hectares on each development. The document refers to five hectares being the equivalent of the Meadows or Saughton Park. These are significant green spaces in Edinburgh which serve very large numbers of people across the city. It is disproportionate to expect any new development to accommodate spaces of that size even if new development is of a high-density. Questions arise as to whether that size of space would be fully utilised at that scale and whether this is an efficient use of development land. Our clients support the provision of open space however there is not guidance as to what quantum of development would trigger the need for the extra-large space standard.

Choice 1 F

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

Short Response

Explanation

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Choice **1 F**

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

Short Response

Explanation

Choice **1 G**

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

Short Response

Explanation

Choice **1 H**

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

Short Response

Explanation

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Choice **2 A**

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

Short Response

Explanation

Choice **2 B**

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

Short Response

Explanation The proposed density of any new development either greenfield and brownfield development at a minimum of 65 units per Hectare is hugely ambitious. We would question whether that level of development is appropriate for greenfield development in edge of settlement locations. Whilst the efficient use land is encouraged by Scottish Planning Policy it should not be at expense of placemaking and the creation of future places that we can be proud of. This would represent a doubling of the desired density from the existing Edinburgh Local Development Plan which expected 30 units per hectare from greenfield sites. In addition, what is not clear is whether the 65 units per Hectare is to apply to the gross area of the site, or the Net Developable Area of the site, the latter being the way most housebuilders would consider density. Density should be delivered on a site by site basis dependent upon the particular circumstances of that individual site and its characteristics. Our clients are supportive of the approach to ensuring high quality places and note that the Options in the main Issues Report include opportunities to develop their landholding. They would support a masterplan-led approach to the development of their sit along with land to the north, and would be happy to work collaboratively to achieve a high-quality development suitable for its location.

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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
There is a risk that the Council in seeking excessive ancillary elements to development such an open space that developments are unable to achieve the requisite higher densities desired. The Council seem to be asking too much of developments. We do not consider that existing policies regarding open space are inappropriate.

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Choice **3 A**

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

Short Response

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

Choice **4 A**

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

Short Response

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

Customer Ref: 01693 Response Ref: ANON-KU2U-GWUQ-B
Name: Andrew McNab
Response Type: Agent / Consultant
On behalf of: The Stoddart Family

Supporting Info:
Email: andrew.mcnab@colliers.com

Choice 4 B

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

Short Response: Not Answered

Explanation: We offer no comment on this other than the new Planning Act allows for Local Place Plans (LPP) to be prepared by local communities and set proposals for development of land of particular significance to a local area. However, it should also be highlighted that the LPP requires to adhere to the LDP and the policy should not the purpose of Local Place Plans should be to guide, not prevent development.

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Choice 5 A

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

Short Response: Yes

Explanation Our clients concur with the Council view that development should be directed to where there is existing or under-utilised infrastructure. If new infrastructure is required, improvements are sought and investment needed, then this requires to be guided by Planning Circular 3/2012 – Planning Obligations and the associated tests and also legal court judgements. A developer contribution must be proportionate and directly relevant to the development proposal. In addition, it is important that the Council notes that putting too much burden upon developers, and ultimately landowners, to pay for infrastructure as developments can become unviable and land withdrawn from the market. It is noted that in relation to Education infrastructure, key to the delivery of new housing, that three new non-denominational primary schools and one new non-denominational secondary school are considered to be required to support development at the East of Riccarton. In delivering this key infrastructure the Council will need to have consideration to; denser developments with smaller properties will actually produce a pupil product to justify contributions, particularly as high-density developments at over 65 units per Hectare is unlikely to be deliver family housing. The delivery of Healthcare infrastructure is contingent upon the NHS engaging with the plan-making process and development management process. The provision of appropriate health care to serve new developments is often a key concern of local communities during the planning application process and problems could often be reduced by better engagement by the health authorities and GP surgeries in the planning process. It is noted that a Healthcare Appraisal is to accompany the Proposed Plan and this is welcomed, provided the NHS appropriately input into its content. Transport Infrastructure is key to the delivery of new development. It is noted that the Edinburgh Strategic Sustainable Transport Study identifies a new transport corridor (Corridor 8) to serve the area in the vicinity of our clients site, the area to the north and the nearby Heriot-Watt University. If the blended approach to delivering the housing needs of Edinburgh is taken forward, improved public transport will be required to serve our clients site and the land to the north and corridor 8 improvements will need to be brought forward into the plan period. We would be happy to discuss options for this during the masterplanning process in due course. As above it is important that any developer contributions to facilitate this are proportionate and meet the tests of the Planning Obligations circular.

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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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Supporting Info

Name

Email

Response Type

On behalf of:

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

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Choice **7 B**

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

Short Response

Explanation

Choice **7 C**

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

Short Response

Explanation

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

Customer Ref: Response Ref:

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Response Type

On behalf of:

Supporting Info

Email

Choice **8 A**

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

Short Response

Explanation The aim to provide new walking and cycling routes is laudable. Our clients believe that a review of the entire cycle/footpath network in the city should be undertaken, where deficiencies or improvements can be identified then these should be highlighted. Any request for development to contribute to these should be proportionate and relevant to the development proposal, as well as meeting all the tests of Circular 3/2012. The improvement of walking and cycling routes from Sighthill past the Heriot-Watt area would be welcomed, as outlined on Map five in the choices document is welcomed. Walking and cycling routes to and from our client site through the redevelopment, and connections could be made to Heriot-Watt University, Curriehill Station and Hermiston Park & ride.

Choice **8 B**

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

Short Response

Explanation

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Choice **8 C**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

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

Choice **9 B**

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

Short Response

Explanation

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Choice 10 A

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

Short Response

Explanation

Choice 10 B

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

Short Response

Explanation

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

Customer Ref: 01693 Response Ref: ANON-KU2U-GWUQ-B
Name: Andrew McNab
Response Type: Agent / Consultant
On behalf of: The Stoddart Family

Supporting Info:
Email: andrew.mcnab@colliers.com

Choice 11 A

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

Short Response:

Explanation

Whilst the Council's aspiration to build 20,000 affordable homes is noted, the aim to increase the affordable housing requirement to 35% from 25% requires to be carefully considered. Addressing affordability will require an element of subsidised affordable housing, but this should not be seen as the only policy mechanism necessary to address the issue. The focus requires to be on providing more housing of all tenures. Edinburgh needs to be building more homes of all tenures otherwise, pressures on affordability will continue. If new housing supply continues to be inadequate to satisfy housing need and demand it will continue to place upwards pressure on affordability. Edinburgh has failed to adequately plan to meet the housing need and demand it has itself identified in its own evidence. When housing supply targets were belatedly produced to support SESplan 1 in November 2014, the 2009-24 target for Edinburgh was just 61% of the figure set out in the Housing Need and Demand Assessment (HNDA, Table 5.1.2). The now abandoned SESPlan 2 only set out to meet 39% of need and demand arising between 2012-30 in Edinburgh. It is unsurprising, though regrettable that this failure to plan to meet need and demand properly appears to be influencing some of the problems which are identified in the Main Issues Report, and the Council now faces requiring developers to develop an unprecedented level of density as a direct result of historic decisions made by the Council as planning authority who were unwilling to meet the city's housing needs in a planned manner. We note the proposed change from delivering 25% an affordable housing land requirement to 35%. We note that this is an Edinburgh Council policy and not one that is supported by the existing Scottish Planning Policy which states that the 'level of affordable housing required as a contribution within a market site should 'generally be no more than 25% of the total numbers of houses' in paragraph 129. In the absence of any Scottish Government policy allowing this, then we suggest the level of required affordable housing should remain as 25% and therefore we support option C under this choice. If the Council pursue the additional 10% affordable units then these should be as a palatable option for developers which can provide them with a financial return, such as unsubsidized Low-Cost Home Ownership. An alternative for use of the additional 10% would be to use it for provision of housing for older people as required by the new Planning Act. The policy should remain at 25% and the Council should seek to deliver its housing need and demand in full to allow a proper functioning housing market. Increasing the requirement to 35% is not supported by Scottish Planning Policy.

Customer Ref: 01693 Response Ref: ANON-KU2U-GWUQ-B

Supporting Info

Name Andrew McNab

Email andrew.mcnab@colliers.com

Response Type Agent / Consultant

On behalf of: The Stoddart Family

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 Yes

Explanation This approach seems reasonable but we do not support increase to 35%.

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On behalf of: The Stoddart Family

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Choice 12 A

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

Short Response: Option 3 (Blended)

Explanation

Please see our attached submission. The South-East Scotland (SESPlan) Strategic Development Plan (SDP) was approved in 2013 and does not break down housing requirements by local authority area beyond 2024. The evidence base for this MIR is therefore dated. We do concur that under the circumstances, with SESPlan2 being rejected by Scottish Ministers in 2019, it is reasonable that the Edinburgh target is set using the more updated HNDA 2 (2015). Our client support the Councils' aim to provide over 20,000 affordable homes to 2032. Choices 2030 sets out two options for a housing target, as follows: 1. Preferred Option: 43,400 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HNDA 2 Wealth Distribution Scenario less completions between 2012 and 2019. 2. Alternative Option: 52,800 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HNDA 2 Wealth Distribution Scenario less completions between 2012 and 2019. Both options fall some way short of meeting housing need and demand in full. The preferred option would meet just 65% of identified need and demand in the HNDA 2 Wealth Distribution Scenario. The alternative option would meet 79% of identified need and demand in the HNDA 2 Wealth Distribution Scenario or 65% of the Strong Economic Growth Scenario. Choices 2030 and the Housing Study do not adequately justify why housing need and demand cannot be met in full. There is a reference to the other factors involved in setting the housing target in SPP (para. 115), but it is not explained in any detail why a downward adjustment from the HNDA output is considered to be justified. This is an important point given the historic severe undersupply of housing and housing land in Edinburgh and merits further significant attention. The alternative target of 52,800 homes is discounted because it is argued that the supporting evidence to the HNDA suggested the Strong Economic Growth Scenarios was unrealistic. However, this evidence was produced in 2013 (Oxford Economics reference) and applied to the whole SESPlan region. It is not considered that these conclusions remain relevant to Edinburgh in 2020 or indeed the next decade to 2030. Taking these factors into consideration we consider that the higher Housing Supply Target (HST) of 52,800 between 2019-32 is the most appropriate target. This equates to approximately 79% of the middle HNDA output. The Edinburgh housing market has self-containment in moves of between 81% and 90%. 79% is close to the lower threshold, but the unmet need and demand will need to be met elsewhere. Our clients believe that the CEC should review the submissions to the MIR and then seek to ascertain how the land required for the full range of housing provision is met. To outline that land will either be provided by the Council and its partners or through market housing is a dogmatic approach that does not reflect the collaboration needed, to ensure all tenure provision is provided for in full, in Edinburgh, over the next decade. To deliver new homes in the most sustainable manner, CEC have expressed a preferred option of these being delivered by the Council and its partners within the urban area, a brownfield sites approach. Our clients recognise the importance of reusing previously developed land as a key objective of the planning system. However, when the Council then outline that to meet their preferred housing requirement they require 275 Ha of urban land and that only 11 Ha is currently available for development and the remainder is currently in use as employment land, then the credibility and deliverability of their preferred strategy requires to be significantly questioned. Our clients believe that a balanced approach is required with a combination of brownfield and greenfield sites coming forward over the next decade to maximise the prospects of Edinburgh delivering the full range of homes it needs for its residents. To meet the 52,800 (+ 10% generosity margin = approximately 58,000) unit requirement favoured by our clients, this

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equates to 4,060 units per annum. With a current land supply of just over 30,000 units, historic brownfield completions of 850 per annum, this equates to a further 11,000 homes to 2032, requiring approximately 17,000 homes to be allocated through the release of greenfield land in Edinburgh. Our clients believe that this will require deliverable sites from all tenure options to ensure that the housing requirements of the city are met in full. We note that the Council's preferred option of delivery of high density brownfield land in which the Council will have to intervene, potentially using Compulsory Purchase powers, 'is outlined in the Choices document as possibly not being financially viable. The acquisition of private land through Compulsory Purchase Powers, and its subsequent delivery for housing should not be underestimated and will represent a significant drain on Council resources over a long period of time. Of the options suggested in the Choices document Option C would be our clients preferred option and seems the most pragmatic approach to delivering the much needed housing, however that should be caveated by the overall need to meet the requirements of the Housing Need in full outlined above. We note that page 42 outlines the parameters of the development of Area 4 – East of Riccarton. This includes the land owned by our clients and having regard to our comments above we would support commentary provided noting that a Place Brief will be created to deliver the development. We would support that a professional team be appointed by the landowners to produce the brief in conjunction with the Council. We would support this, or a masterplanned approach which delivers the entire site rather than a disjointed approach. We caution the Council that a high-density development of 65 units per Hectare is not appropriate for this location and do not agree with this approach. This level of density is appropriate for urban areas but we question whether this is appropriate for this edge of settlement more rural location. We therefore cautiously support Option C and reiterate that our clients' land is free and available to form part of a strategic allocation at the East of Riccarton, which we consider appropriate for housing-led development.

Choice 12 B1

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

Short Response

Explanation

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Choice **12 B2**

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

Short Response

Explanation

Choice **12 B3**

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

Short Response

Explanation

Choice **12 B4**

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

Short Response

Explanation

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Choice **12 B5**

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

Short Response

Explanation

Choice **12 B6**

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

Short Response

Explanation

Choice **12 B7**

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

Short Response

Explanation

Customer Ref: 01693 Response Ref: ANON-KU2U-GWUQ-B

Supporting Info

Name Andrew McNab

Email andrew.mcnab@colliers.com

Response Type Agent / Consultant

On behalf of: The Stoddart Family

Choice 12 B8

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

Short Response Not Answered

Explanation

Choice 12 B9

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

Short Response Not Answered

Explanation

Choice 12 B10

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

Short Response Not Answered

Explanation

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Choice **12 BX**

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

Short Response

Explanation We support the development of the East of Riccarton site and with a masterplanned approach. We note the site is visually isolated in this location. It can assist in delivering much needed housing in the south-west of Edinburgh. This is outlined in our submitted document. We note that the housing paper which supports the LDP identifies the site as being suitable for development, with which we would concur.

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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On behalf of:

Choice 12 C

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

Short Response

Explanation

Choice 12 D

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

Short Response

Explanation

Choice 13 A

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

Short Response

Explanation

Customer Ref: Response Ref:

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Choice **14 A**

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

Short Response

Explanation

Choice **14 B**

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

Short Response

Explanation

Customer Ref: Response Ref:

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On behalf of:

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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:
Name
Response Type
On behalf of:

Supporting Info
Email

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 We note that small scale retail for local shopping may be appropriate to be brought forward under any future masterplan for the land East of Riccarton to ensure opportunities exist for future residents to shop locally either by walking or a sustainable transport mode.

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 We have no comment on this.

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 Policies on retail should be part of the development plan and thoroughly considered through independent examination.

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

Supporting Info
Email

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

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

Supporting Info
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:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 A5

We want to continue to support office development in other accessible locations elsewhere in the urban area. Do you agree? - 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

Customer Ref: 01693 Response Ref: ANON-KU2U-GWUQ-B

Name Andrew McNab

Response Type Agent / Consultant

On behalf of: The Stoddart Family

Supporting Info

Email andrew.mcnab@colliers.com

Choice 16 C

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

Short Response I support no chang

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 Not Answered

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 Not Answered

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

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:

Supporting Info

Name

Email

Response Type

On behalf of:

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

Customer Ref: 01693 Response Ref: ANON-KU2U-GWUQ-B

Name: Andrew McNab

Response Type: Agent / Consultant

On behalf of: The Stoddart Family

Supporting Info:

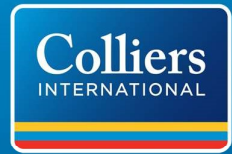
Email: andrew.mcnab@colliers.com

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: Yes

Explanation: Yes this seems a sensible approach.

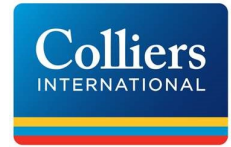


City of Edinburgh Council Main Issues Report – Choices for City Plan 2030

MARCH 2020

COLLIERS INTERNATIONAL

THE STODDART FAMILY



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1 INTRODUCTION

1.1 OVERVIEW

The Stoddart Family welcome the opportunity to comment on the City of Edinburgh Council Main Issues Report – Choices for City Plan 2030.

The Stoddart Family own the land outlined in red on the accompanying site plan in Appendix 1. The site is 10.9Ha in size and is currently in agricultural use. The surrounding land uses include an Edinburgh to Glasgow railway line to the south, the suburban area of Baberton is located to the south-west. To the north-west lies the campus of Heriot-Watt university. The site is situated in west Edinburgh.

2 SCOTTISH PLANNING POLICY (SPP)

2.1 CONTEXT

The purpose of the SPP is to set out national planning policies which reflect Scottish Ministers' priorities for operation of the planning system and for the development and use of land. It is non-statutory, but the SPP is a material consideration that carries significant weight. In new planning reforms the SPP is to be incorporated within the National Planning Framework in the future, consolidating the Scottish Government spatial strategy and planning policy. This change will make Scottish Planning policy part of the development plan, however for the time being it remains a material consideration.

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

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

2.2 LOCAL DEVELOPMENT PLANS

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

- be consistent with the policies set out in this SPP, including the presumption in favour of development that contributes to sustainable development;
- positively seek opportunities to meet the development needs of the plan area in a way which is flexible enough to adapt to changing circumstances over time;
- support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area;

- be up-to-date, place-based and enabling with a spatial strategy that is implemented through policies and proposals; and
- set out a spatial strategy which is both sustainable and deliverable, providing confidence to stakeholders that the outcomes can be achieved.

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

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

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

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

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

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

It is against this policy backdrop that the Council is producing its new Local Development Plan.

3 CHOICES FOR CITY PLAN 2030

3.1 GENERAL COMMENTARY

The main planning consideration for our clients is the significant challenge of the Edinburgh Council area in meeting and delivering its required housing needs in full in the plan period, over the next decade. A long-term issue for Edinburgh is that it has been unable to meet its housing demand in full, a long-standing issue that Scottish Government is keen, as are developers, for the Edinburgh Council to resolve.

Given its location adjacent to the urban area of Baberton and its proximity to key transport nodes at the airport, the city bypass and the tramline, it is considered that the future of the subject site is to accommodate development as part of Edinburgh's growth to the west. This will inevitably lead to pressure for change in the land use from agricultural to residential use in this area, as demonstrated by the options presented in the Main Issues Report.

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

Of note to our clients is the Council's suggestion in two of the three housing choices that they will intervene in the market using Compulsory Purchase Powers to deliver land for housing development. This approach is, we believe, unprecedented in modern times in Scotland and it is hoped that Council officers and the members of the Planning Committee are fully appreciative of the time involved in bringing forward development using Compulsory Purchase powers, in particular when the objective is to meet housing need during the plan period to 2030.

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

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

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

These are laudable aims and objectives for the new Local Development Plan to have and are supported. In particular the aim that everyone lives in a home they can afford

is a particularly significant challenge and one which our client can assist with in providing land to the housing market for development.

Hereafter we address the individual 'Choices' outlined in the consultation document.

3.2 CHOICE ONE - EDINBURGH, SUSTAINABLE, ACTIVE AND CONNECTED

A new policy in the forthcoming LDP which takes account of connecting places, parks and greenspaces is supported by our clients. These contribute to both health and well-being. Encouragement for walking, cycling and sport are generally supported.

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

As part of a masterplanned approach the development of our clients site appropriate open space can be provided. Our clients would support a collaborative approach to the development of the two sites to ensure appropriate green infrastructure is provided.

The requirement for providing open space in any new development needs to be proportionate and deliver spaces that will be used by future residents. Small unmaintained spaces in new developments are often underutilised and lead to an inefficient use of land.

We would not support against a blanket 'extra-large green space standard' of five hectares on each development. The document refers to five hectares being the equivalent of the Meadows or Saughton Park. These are significant green spaces in Edinburgh which serve very large numbers of people across the city. It is disproportionate to expect any new development to accommodate spaces of that size even if new development is of a high-density. Questions arise as to whether that size of space would be fully utilised at that scale and whether this is an efficient use of development land.

Our clients support the provision of open space however there is not guidance as to what quantum of development would trigger the need for the extra-large space standard.

There is therefore not enough information to appropriately support, or not, proposed change E. Support is however given for changes A-H with the exception of E.

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

The proposed density of any new development either greenfield and brownfield development at a minimum of 65 units per Hectare is hugely ambitious. We would question whether that level of development is appropriate for greenfield development in edge of settlement locations. Whilst the efficient use land is encouraged by Scottish Planning Policy it should not be at expense of placemaking and the creation of future places that we can be proud of.

This would represent a doubling of the desired density from the existing Edinburgh Local Development Plan which expected 30 units per hectare from greenfield sites. In addition, what is not clear is whether the 65 units per Hectare is to apply to the gross area of the site, or the Net Developable Area of the site, the latter being the way most housebuilders would consider density. Density should be delivered on a site by site basis dependent upon the particular circumstances of that individual site and its characteristics.

Our clients are supportive of the approach to ensuring high quality places and note that the Options in the main Issues Report include opportunities to develop their landholding. They would support a masterplan-led approach to the development of their sit along with land to the north, and would be happy to work collaboratively to achieve a high-quality development suitable for its location.

Our clients would support proposed changes A, and C but not B and d. Our client would support Option E under this choice, to retain the existing policy on density as they do not consider a minimum 65 units per Hectare is appropriate across the plan area.

3.4 CHOICE THREE – CARBON NEUTRAL BUILDINGS

Our clients recognise that there is a requirement to reduce carbon emissions through both good design and use of low and zero carbon generating technologies. We note the Council's aim for all buildings in Edinburgh to be zero carbon by 2030 and 50% of the carbon reduction target being met through low and zero carbon generating technologies. However, our clients believe that emissions standards for new buildings should continue to sit within the building standards regulatory regime and not the planning system. This causes needless duplication, when the focus should be on maximising the efficiency of existing planning resource. Therefore, apart from



an overall Edinburgh Council view of seeking to achieve carbon neutral buildings, this should not result in a bespoke planning policy in the LDP.

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

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

The new Planning Act allows for Local Place Plans (LPP) to be prepared by local communities and set proposals for development of land of particular significance to a local area. However, it should also be highlighted that the LPP requires to adhere to the LDP and the policy should not the purpose of Local Place Plans should be to guide, not prevent development.

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

3.6 CHOICE FIVE – DELIVERING COMMUNITY INFRASTRUCTURE

Our clients concur with the Council view that development should be directed to where there is existing or under-utilised infrastructure. If new infrastructure is required, improvements are sought and investment needed, then this requires to be guided by Planning Circular 3/2012 – Planning Obligations and the associated tests and also legal court judgements. A developer contribution must be proportionate and directly relevant to the development proposal. In addition, it is important that the Council notes that putting too much burden upon developers, and ultimately landowners, to pay for infrastructure as developments can become unviable and land withdrawn from the market.

It is noted that in relation to Education infrastructure, key to the delivery of new housing, that three new non-denominational primary schools and one new non-

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

The delivery of Healthcare infrastructure is contingent upon the NHS engaging with the plan-making process and development management process. The provision of appropriate health care to serve new developments is often a key concern of local communities during the planning application process and problems could often be reduced by better engagement by the health authorities and GP surgeries in the planning process. It is noted that a Healthcare Appraisal is to accompany the Proposed Plan and this is welcomed, provided the NHS appropriately input into its content.

Transport Infrastructure is key to the delivery of new development. It is noted that the Edinburgh Strategic Sustainable Transport Study identifies a new transport corridor (Corridor 8) to serve the area in the vicinity of our clients site, the area to the north and the nearby Heriot-Watt University. If the blended approach to delivering the housing needs of Edinburgh is taken forward, improved public transport will be required to serve our clients site and the land to the north and corridor 8 improvements will need to be brought forward into the plan period. We would be happy to discuss options for this during the masterplanning process in due course. As above it is important that any developer contributions to facilitate this are proportionate and meet the tests of the Planning Obligations circular.

Our clients therefore support proposed changes A – E.

3.7 CHOICE SIX – PEOPLE NOT CARS

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

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

Our clients therefore support proposed changes A & B.

3.8 CHOICE SEVEN – REDUCE CAR USE

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

Our clients therefore support proposed changes A-E.

3.9 CHOICE EIGHT – DELIVERING NEW WALKING/CYCLING ROUTES

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

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

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

Our clients therefore support proposed changes A-C

3.10 CHOICE NINE – PROTECTING AGAINST LOSS OF HOMES

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

Our clients offer no comments on the proposed changes in choice 9.



3.11 CHOICE TEN - CREATING SUSTAINABLE COMMUNITIES

Our clients support the aim to increase the number of new homes in Edinburgh including affordable housing. However, we would caution against the requirement for proposals for student housing, hotels, and short-stay commercial visitor accommodation to provide 50% of the site for housing. This would seem a rather draconian approach to deliver may well be a disincentive for investment in Edinburgh for specific types of developers.

Our clients therefore do not support the changes and consider the current policy approach should continue with options D & E.

3.12 CHOICE ELEVEN – AFFORDABLE HOUSING

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

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

It is unsurprising, though regrettable that this failure to plan to meet need and demand properly appears to be influencing some of the problems which are identified in the Main Issues Report, and the Council now faces requiring developers to develop an unprecedented level of density as a direct result of historic decisions made by the Council as planning authority who were unwilling to meet the city's housing needs in a planned manner.

We note the proposed change from delivering 25% an affordable housing land requirement to 35%. We note that this is an Edinburgh Council policy and not one

that is supported by the existing Scottish Planning Policy which states that the 'level of affordable housing required as a contribution within a market site should *generally be no more than 25% of the total numbers of houses*' in paragraph 129.

In the absence of any Scottish Government policy allowing this, then we suggest the level of required affordable housing should remain as 25% and therefore we support option C under this choice. If the Council pursue the additional 10% affordable units then these should be as a palatable option for developers which can provide them with a financial return, such as unsubsidized Low-Cost Home Ownership. An alternative for use of the additional 10% would be to use it for provision of housing for older people as required by the new Planning Act.

3.13 CHOICE TWELVE – BUILDING NEW HOMES AND INFRASTRUCTURE

Choice twelve recognises the need for new homes to be built in Edinburgh and this will involve identifying new land for housing across the city.

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

Our client support the Councils' aim to provide over 20,000 affordable homes to 2032.

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

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

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

Choices 2030 and the Housing Study do not adequately justify why housing need and demand cannot be met in full. There is a reference to the other factors involved in setting the housing target in SPP (para. 115), but it is not explained in any detail why a downward adjustment from the HNDA output is considered to be justified. This is an important point given the historic severe undersupply of housing and housing land in Edinburgh and merits further significant attention.

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

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

Our clients believe that the CEC should review the submissions to the MIR and then seek to ascertain how the land required for the full range of housing provision is met. To outline that land will either be provided by the Council and its partners or through market housing is a dogmatic approach that does not reflect the collaboration needed, to ensure all tenure provision is provided for in full, in Edinburgh, over the next decade.

To deliver new homes in the most sustainable manner, CEC have expressed a preferred option of these being delivered by the Council and its partners within the urban area, a brownfield sites approach. Our clients recognise the importance of reusing previously developed land as a key objective of the planning system. However, when the Council then outline that to meet their preferred housing requirement they require 275 Ha of urban land and that only 11 Ha is currently available for development and the remainder is currently in use as employment land, then the credibility and deliverability of their preferred strategy requires to be significantly questioned.

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

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

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

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

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

We note that page 42 outlines the parameters of the development of Area 4 – East of Riccarton. This includes the land owned by our clients and having regard to our comments above we would support commentary provided noting that a Place Brief will be created to deliver the development. We would support that a professional team be appointed by the landowners to produce the brief in conjunction with the Council. We would support this, or a masterplanned approach which delivers the entire site rather than a disjointed approach.

We caution the Council that a high-density development of 65 units per Hectare is not appropriate for this location and do not agree with this approach. This level of density is appropriate for urban areas but we question whether this is appropriate for this edge of settlement more rural location.

We therefore cautiously support Option C and reiterate that our clients' land is free and available to form part of a strategic allocation at the East of Riccarton, which we consider appropriate for housing-led development.

3.14 CHOICE THIRTEEN – INNOVATION, UNIVERSITIES AND CULTURE

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

Our clients therefore support proposed change A.

3.15 CHOICE FOURTEEN – DELIVERING WEST EDINBURGH

It is recognised that the area in and around Edinburgh Airport is identified as nationally significant in economic and transport terms, there are strategic land allocations from the current LDP 2016 for growth in this area. There are proposals to build on these allocations through this next LDP and our clients support this approach.

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

Our clients therefore support proposed changes A-C.

3.16 CHOICE FIFTEEN – PROTECTING CITY, TOWN AND LOCAL CENTRES

Edinburgh fortunately benefits from a healthy range of local, town and thriving city centres. Our clients support the policy option to seek to strengthen local and town centres, as these are often in sustainable locations with good transport connections that provide a range of goods, services and community facilities. We note that small scale retail for local shopping may be appropriate to be brought forward under any future masterplan for the land East of Riccarton to ensure opportunities exist for future residents to shop locally either by walking or a sustainable transport mode.

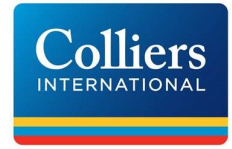
Our clients therefore support the proposed changes A-E noting B where small-scale proposals may be permitted where there is evidence of a lack of food shopping within walking distance and how this may be reflected in any emerging masterplan for the East of Riccarton.

3.17 CHOICE SIXTEEN – DELIVERING OFFICE, BUSINESS AND INDUSTRIAL FLOORSPACE

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

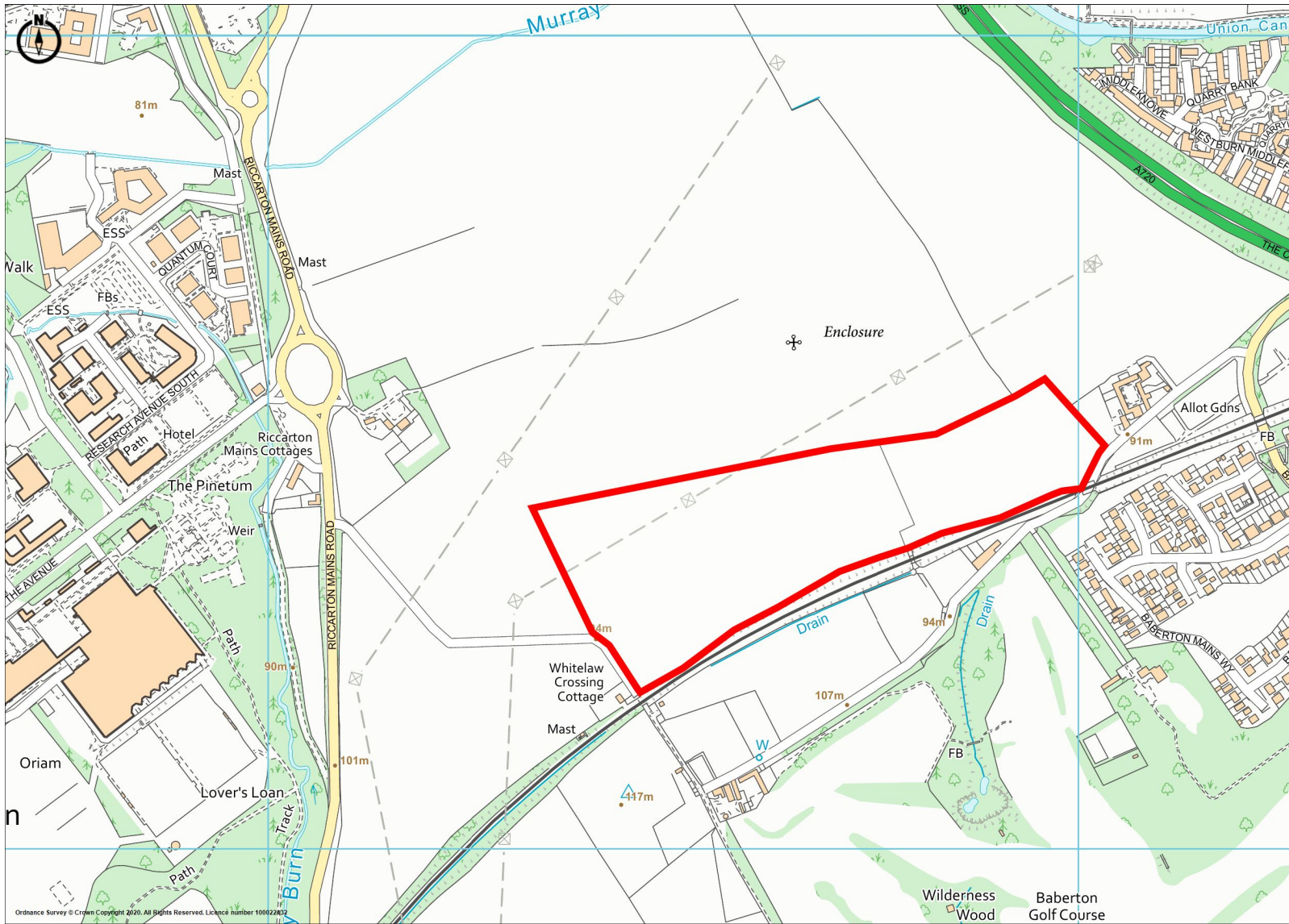
We note the proposed changes, including Option B which involves the provision of business space in Place Briefs for greenfield sites. We do not agree with this approach as a requirement, though it should be market-led on an opportunity basis for the greenfield sites.

Our clients therefore support proposed changes A, C & D but not B.



APPENDIX 1:





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