

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** We agree with the option presented within Choice 1 and a strengthening of policies to reflect climate change and a carbon neutral city by 2030. Land at Summerside can assist in achieving this choice. However, achieving this will be difficult if a purely brownfield housing land approach is adopted as recommended. A blended approach towards housing land would be needed to ensure sufficient open space and green and blue networks can be achieved within new development. We consider development at Summerside and the wider South East Edinburgh area is strongly in conformity with Choice 1.

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** We agree with the option presented within Choice 1 and a strengthening of policies to reflect climate change and a carbon neutral city by 2030. Land at Summerside can assist in achieving this choice. However, achieving this will be difficult if a purely brownfield housing land approach is adopted as recommended. A blended approach towards housing land would be needed to ensure sufficient open space and green and blue networks can be achieved within new development. We consider development at Summerside and the wider South East Edinburgh area is strongly in conformity with Choice 1.

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On behalf of:

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** We agree with the option presented within Choice 1 and a strengthening of policies to reflect climate change and a carbon neutral city by 2030. Land at Summerside can assist in achieving this choice. However, achieving this will be difficult if a purely brownfield housing land approach is adopted as recommended. A blended approach towards housing land would be needed to ensure sufficient open space and green and blue networks can be achieved within new development. We consider development at Summerside and the wider South East Edinburgh area is strongly in conformity with Choice 1.

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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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On behalf of:

Supporting Info   
Email

Choice 1 H

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

Short Response

Explanation

Choice 2 A

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

Short Response

**Explanation** The underlying aims of Choice 2 are agreed. A more consistent approach to design, layout and accessibility is welcomed in relation to development in South East Edinburgh. A consistent approach is essential to the production and submission of Design and Access Statements, to ensure all applications provide the information required to the level of detail necessary. A requirement to provide the information as specified in the Edinburgh Design Guidance document should be introduced to policy.

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Choice **2 B**

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

Short Response

Explanation Yes, but a purely brownfield approach to housing land supply will still not achieve the required quantum of housing land. Delivering this aspiration will be difficult if a purely brownfield housing land approach is adopted. Smaller city centre brownfield sites would be restricted in developable area once open space and car parking requirements are met. A blended approach towards housing land is therefore needed to ensure that sufficient land is available to meet housing needs. This will be a significant policy shift that planning officers must be prepared to discuss at pre-app stage, providing quantitative advice on density, scale and massing.

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

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Choice **2 D**

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

Short Response

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

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

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Email

Choice **4 B**

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

Short Response

Explanation

Choice **5 A**

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

Short Response

Explanation

Choice **5 B**

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

Short Response

Explanation

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Supporting Info

Email

Choice 5 C

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

Short Response

Explanation

Choice 5 D1

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

Short Response

Explanation

Choice 5 D2

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

Short Response

Explanation



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Supporting Info   
Email

Choice 5 E

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

Short Response

Explanation

Choice 6 A

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

Short Response

Explanation

Choice 6 B

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

Short Response

Explanation

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Email

Choice **7 A**

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

Short Response

Explanation

Choice **7 B**

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

Short Response

Explanation

Choice **7 C**

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

Short Response

Explanation

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Choice **7 D**

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

Short Response

Explanation

Choice **8 A**

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

Short Response

Explanation

Choice **8 B**

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

Short Response

Explanation

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Name   
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On behalf of:

Supporting Info   
Email

Choice 8 C

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

Short Response

Explanation

Choice 8 C

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

Short Response

Explanation

Choice 9 A

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

Short Response

Explanation

Customer Ref:  Response Ref:

Name

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On behalf of:

Supporting Info

Email

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

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

Customer Ref:  Response Ref:   
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On behalf of:

Supporting Info   
Email

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** Increasing the Affordable Housing quota to 35% essentially requires a ratio of affordable to market housing of 1:2 rather than the current 1:3. This has implications for viability and delivery, particularly given the reliance on more difficult and costly brownfield sites. The Council's approved Strategic Housing Investment Plan (SHIP) 2020-2025 highlights the significant challenges associated with fulfilling the Council's commitment to deliver 20,000 affordable homes over the next 10 years, including securing both land and finance. The new LDP requires to address the shortfall in supply, particularly given the need to deliver in the region of 2,000 affordable homes every year in accordance with the SHIP programme. The SESplan 2 examination acknowledged that new land would require to be released to meet the demand for affordable housing. Delivery of this quantum of development will require more land to be identified in locations such as South East Edinburgh and this site at Summerside. In order to meet the 35% affordable housing objective, the Council will need to take a more realistic and flexible policy to allocation as part of a blended housing land approach.

Customer Ref: 01751      Response Ref: ANON-KU2U-GWRX-F  
Name: Stuart Szylak  
Response Type: Agent / Consultant  
On behalf of: Tom Klan

Supporting Info:   
Email: stuart@rickfincassociates.com

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: No

Explanation: This will surely be primarily market driven . How will the council decide what the mix, type and tenure should be for each site? In reality this mix will vary from site to site and by location. The policy needs to attract houebuilders, not hinder them.

Customer Ref: 01751      Response Ref: ANON-KU2U-GWRX-F  
Name: Stuart Szylak  
Response Type: Agent / Consultant  
On behalf of: Tom Klan

Supporting Info:   
Email: stuart@rickfincassociates.com

Choice 12 A

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

Short Response: Option 3 (Blended)

**Explanation**

We are not in agreement with this section of the Main Issues Report or the preferred approach being taken by the Council, which discriminates against viable housing locations such as South East Edinburgh. A purely brownfield approach to housing land is simply not viable. The proposal to base City Plan 2030 on targets within SDP1 and HNDA2 is therefore open to question and interpretation, for reasons as set out in the MIR itself. Not only are the figures historic, scenario based and Lothian wide. In particular there is no breakdown for Edinburgh beyond 2024. If HNDA 2 is used as a reasonable baseline both the preferred and alternative options relating to the housing targets of 43,400 and 52,800 respectively fall significantly short of meeting need and demand in full. There is no justification why this should be the case and why the undersupply of housing is not being addressed. Indeed, it is expected that the Council should set challenging targets in the LDP in light of private housing land completions in recent years. On this basis under the preferred option in addition to 20,800 affordable houses, the market housing target is 22,600 units. However, these figures represent broad estimates which are largely unsupported by up to date evidence and household projections. In addition, this approach is not considered to be realistic feasible or deliverable over the term of the LDP. Regarding delivery, the City Council considers that there is currently sufficient land for 47,000 houses. Of this 9,200 has no consent and 16,900 is brownfield or windfall supply. Programming indicates that not all sites in the 2019 HLA will be complete by 2032. Extrapolating the figures in accordance with SPP, Circular 2/2010, current practice (DPEA) demonstrates that using this method only 21,055 dwellings would be delivered on effective sites. Constrained sites should be excluded from the analysis and only effective sites should contribute to the land supply. The Council's Housing Study is sub divided into two parts which are internally inconsistent and do not relate to equivalent sub-divisions. There are 23 Assessment Areas, none corresponding to Craigiehall, however it should be noted that nearby Area 22 West Edinburgh scores particularly well on the given criteria in Figure 2 Assessment of Site Groupings. The brownfield Urban Area Site Assessment identifies 142 sites with development potential and a notional density capacity of 16,900-27,000 units. Based on Figure 4 Estimated Site Capacities, this is considered a gross overestimate of urban brownfield capacity within the city and completely underestimates the difficulties of delivering such land. The assessment of potential housing land sites in the urban area is not properly considered in terms of delivery or economics. It is assumed that all sites (16,900) identified will be delivered in full which is not a credible proposition particularly given ownership, cost considerations and economic viability. The preferred option is reliant on Compulsory Purchase with long lead in periods and legal issues. It is rendered unfeasible by this approach and emphasises the need for additional greenfield allocations. The greenfield or market requirement is informed by the housing land supply target and HNDA as discussed above. Option 2 with a requirement of 28,000 houses), provides a reasonable indication of what the market approach should entail including a generous provision for affordable housing and urban area brownfield development. In respect of Greenfield Housing the methodology is 'partially based' on Strategic Development Areas without justification for their continued existence, as opposed to development corridors. However, more development sites are identified outwith SDAs than within them. This evaluation does not bear objective scrutiny in locational, sustainability or material planning terms. A blended approach is the only real alternative.



Customer Ref:

01751

Response Ref:

ANON-KU2U-GWRX-F

Supporting Info

Name

Stuart Szylak

Email

stuart@rickfincassociates.com

Response Type

Agent / Consultant

On behalf of:

Tom Klan

Choice

12 B1

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

Short Response

Not Answered

Explanation

Choice

12 B2

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

Short Response

Not Answered

Explanation

Choice

12 B3

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

Short Response

Not Answered

Explanation

Customer Ref:  Response Ref:   
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On behalf of:

Supporting Info   
Email

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

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

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

Choice **12 B9**

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

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **12 B10**

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

Short Response

Explanation

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**

Whilst the site being promoted through this representation is located on the south east periphery of the city, currently within the green belt, it has rightly been identified by CEC as part of a wider greenfield release for housing development. Such a release would be a logical extension to the city and takes advantage of the existing infrastructure. The landowner's site allocation would meet the underlying aims and objectives of the emerging LDP, in particular:

- It is part of a wider greenfield allocation with definite boundaries, although development at South East Edinburgh will integrate well with and complement the adjoining Shawfair area.
- Landscape and environmental sensitivities are minimal.
- Development of the site will maintain the identity, character and landscape setting of nearby settlements and prevent coalescence.
- Development of the site will avoid significant loss of landscape-scale land identified as being of existing or potential value for the strategic green network.
- Existing public transport services and bus stops are located on the eastern boundary.
- The site sits on the South East Transit Corridor.
- The Core Path network and dedicated cycle lanes exist along Old Dalkeith Road.
- The site is within walking distance to local convenience services and to the emerging Shawfair Park employment cluster.
- The site is well positioned to maximise development in accordance with the City Mobility Plan and the Sustainable Transport Strategy.
- The site lies in a marketable area with high level of demand for private housing and need for affordable housing.

A 'blended' approach to housing land provision is by far the most sensible and achievable option and should be adopted in City Plan 2030.

Customer Ref:

01751

Response Ref:

ANON-KU2U-GWRX-F

Supporting Info

Name

Stuart Szylak

Email

stuart@rickfincassociates.com

Response Type

Agent / Consultant

On behalf of:

Tom Klan

Choice 12 C

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

Short Response

Yes

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

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

Supporting Info   
Email

Choice 12 D

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

Short Response

Explanation

Choice 13 A

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

Short Response

Explanation

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

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Choice **14 B**

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

Short Response

Explanation

Choice **14 C**

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

Short Response

Explanation

Choice **15 A**

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

Short Response

Explanation

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On behalf of:

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Choice 15 B

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

Short Response

Explanation

Choice 15 C

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

Short Response

Explanation

Choice 15 D

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

Short Response

Explanation



Customer Ref: 01751      Response Ref: ANON-KU2U-GWRX-F  
Name: Stuart Szylak  
Response Type: Agent / Consultant  
On behalf of: Tom Klan

Supporting Info:   
Email: stuart@rickfincassociates.com

Choice 15 E

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

Short Response:

Explanation:

Choice 15 G

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

Short Response:

Explanation:

Choice 16 A1

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

Short Response:

Explanation:

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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

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Choice **16 A5**

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

Short Response

Explanation

Choice **16 A5**

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

Short Response

Explanation

Choice **16 B**

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

Short Response

Explanation

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Choice 16 C

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

Short Response

Explanation

Choice 16 E1

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

Short Response

Explanation

Choice 16 E2

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

Short Response

Explanation

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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

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On behalf of:

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Choice 16 E6

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

Short Response

Explanation

Choice 16 E7

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

Short Response

Explanation

Choice 16 E8

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

Short Response

Explanation

Customer Ref:  Response Ref:   
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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: 01751      Response Ref: ANON-KU2U-GWRX-F  
Name: Stuart Szylak  
Response Type: Agent / Consultant  
On behalf of: Tom Klan

Supporting Info:   
Email: stuart@rickfincassociates.com

Choice      16 H

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

Short Response: Not Answered

Explanation: Not Answered



**Prepared on behalf of Mr and Mrs Tom Klan**

**Land at Summerside, Old Dalkeith Road, Edinburgh**

**Submission to CEC on Choices for City Plan 2030 (Main Issues Report).**

## **Introduction**

- 1.1 RFA Planning and Development represents the Klan family in terms of providing planning advice in relation to their land and property at Summerside, Old Dalkeith Road to the south east of the City. This representation is in response to the publication of the City of Edinburgh Council's Main Issues Report - 'Choices for City Plan 2030' (MIR).
- 1.2 The land subject of this representation is at present designated as Green Belt. Also, part of the site may be affected by works planned to the Sherrifhall Roundabout by Transport Scotland. The land is identified in the MIR as a potential housing development site, as part of a wider greenfield release option at South East Edinburgh. The site also forms part of the 'Drum South' assessment area on which CEC has conducted a number of environmental appraisals to establish suitable land for future development.
- 1.3 Developing this land is not the Council's preferred approach, but this representation argues that a 'blended' approach needs to be adopted for housing land allocations and this site should indeed be allocated for housing development in the emerging LDP.
- 1.4 This representation objects to the preferred provisions of Choice 12 Building New Homes and Infrastructure. It argues that a purely brownfield land approach to housing land provision is unrealistic and that a 'blended' approach should be adopted in City Plan 2030.

## **Site Location and Context**

- 1.5 The site is located in the extreme south of the Council's 'Drum South' assessment area, adjacent to the Sheriffhall Roundabout. There are a number of existing residential properties within the site surrounded by paddock areas. Transport Scotland has initiated the CPO process to obtain part of the land for the construction of the Sheriffhall Roundabout improvement works (see Figure 1).
- 1.6 The site benefits from immediate proximity to existing public transport provision and active travel facilities. These are not fairly considered in the Council's Greenfield Site Assessment for

Drum South.

- 1.7 A Cross Boundary Core Path runs north/south along the east of the site. There is also a dedicated cycle lane running along both sides of Old Dalkeith Road in this location.
- 1.8 A number of bus services run along Old Dalkeith Road, bus stops are located immediately at the site entrance for city-bound buses and 180m to the north for southbound services. The Sheriffhall Park and Ride facility which serves the City is located 600m to the north. These do not seem to have been recognised by CEC in its assessment.
- 1.9 Local convenience services are within walking distance, as is the identified and emerging employment cluster at Shawfair Park. The identified employment cluster has not been sufficiently recognised in CEC's Greenfield Site Assessment.

**Figure 1 – Site Location**



## Development Proposals

- 1.10 It is considered that the site is suitable for new housing or mixed-use development, whichever maximises the development potential. In terms of the former we consider that the site has capacity for approximately 25 units. However, the development opportunity must be seen in the context of the land-take for the proposed improvements at Sherrifhall Roundabout, which may or may not happen.
- 1.11 Development will be designed to sit within a landscaped framework including tree planting which will maintain the local amenity and strengthen the green network. It will have strong links with the remainder of the allocation to the north west and into Shawfair town centre.

- 1.12 The development would utilise existing, and contribute to improving, public transport provision and active travel facilities. The Sheriffhall Park and Ride facility which serves the City is located 600m to the north. A Cross Boundary Core Path runs north/south along the east of the site. A number of bus services run along Old Dalkeith Road, bus stops are located immediately at the site entrance for city-bound buses and 180m to the north for southbound services.

## Housing Land Requirement

- 1.13 The allocation of housing land must be informed by the Housing Land Requirement and supply target.
- 1.14 The Second Proposed Strategic Development Plan (SDP2), together with the associated HNDA2 and Transport Strategy, was rejected by Scottish Ministers in May 2019. The current SDP1 2013 has not been replaced, updated or revoked so therefore remains the extant Strategic Development Plan, albeit out of date.
- 1.15 It is not accepted that simply using supply targets in SDP1 and HNDA2 is a legitimate or sensible basis for determining the City's housing requirement up to 2032. The suggested target of 22,600 market houses is considered a gross underestimate of the actual requirement. The Council's preferred delivery of brownfield land (Option 1) to meet the housing requirement is simply not feasible or viable and would result in an undersupply over the plan period. The Council seems to acknowledge this in the MIR.
- 1.16 The greenfield approach (Option2) requiring 27,900 units is identified as an alternative approach but then described by the Council as '*simply not an option*'.
- 1.17 A blended approach (Option 3) would in principle appear to be the most practical and realistic approach and is estimated to involve the release of 6,600 units from greenfield sources. We argue that this should be the option taken forward into City Plan 2030. We also argue that, as part of this Option, land at South East Edinburgh should be allocated for housing as part of a greenfield housing-led release.

## Response to Choices

- 1.18 The following table presents a response to the appropriate Choices and explains how allocation of the site at Summerside can contribute to achieving the overall aims and objectives of City Plan 2030.

CHOICE	JUSTIFICATION AND EVIDENCE
<i>1. Making Edinburgh a sustainable active and connected city.</i>	We agree with the option presented within Choice 1 and a strengthening of policies to reflect climate change and a carbon neutral city by 2030. Land at Summerside can assist in achieving this choice. However, achieving this will

	<p>be difficult if a purely brownfield housing land approach is adopted as recommended.</p> <p>A blended approach towards housing land would be needed to ensure sufficient open space and green and blue networks can be achieved within new development.</p> <p>We consider development at Summerside and the wider South East Edinburgh area is strongly in conformity with Choice 1.</p>
<p><i>2.Improving the quality, density and accessibility of development.</i></p>	<p>The underlying aims of Choice 2 are agreed. A more consistent approach to design, layout and accessibility is welcomed in relation to development in South East Edinburgh.</p> <p>Delivering this aspiration will be difficult if a purely brownfield housing land approach is adopted. Smaller city centre brownfield sites would be restricted in developable area once open space and car parking requirements are met. A blended approach towards housing land is therefore needed to ensure that sufficient land is available to meet housing needs.</p> <p>Development at Summerside and South East Edinburgh will respond to climate change, accessibility for all ages and mobility needs. The area is under considerable development pressure and this allocation is the best option for achieving housing land targets.</p>
<p><i>4.Creating Place Briefs and Local Place Plans in our communities.</i></p>	<p>The landowner is prepared to be involved in a wider exercise in preparation of a Place Brief to guide development standards and quality in the area.</p>
<p><i>6.Creating Places that focus on people and not cars</i></p>	<p>It should be noted that the Housing Study assessment table for Drum South is particularly inaccurate when considering Active Travel and Public Transport assessment criteria.</p> <p>The site is located adjacent to a bus route and bus stops are immediately adjacent to the site (citybound) and 180m to the north (southbound).</p> <p>The site is within walking distance to the emerging Shawfair Park employment cluster (600m).</p> <p>The site is within walking distance to local convenience services.</p> <p>The Corel Path network lies directly to the east of the site.</p> <p>Both sides of Old Dalkeith Road possesses a dedicated cycle lane linking to the wider cycle network.</p> <p>The site is well positioned to maximise development in accordance with the City Mobility Plan and the Sustainable Transport Strategy.</p> <p>The site sits on the South East Transit Corridor.</p> <p>The site is compliant with the walkable neighbourhood principles contained within Designing Streets. Existing amenities and employment clusters are well within the recommended maximum walking distance of 1,600m as detailed in PAN 75.</p>
<p><i>9.Protecting against the loss of Edinburgh's homes to other uses.</i></p>	<p>It is acknowledged that the existing housing stock within the city is under pressure from alternative uses such as short term lets. However, this is also because the supply of new houses is artificially constrained by the available land supply and reliant on brownfield and windfall sites.</p> <p>This issue needs to be seen in the context of the overall requirement and demand for housing in the city from all sources, including visitors and students as well as specialist housing types.</p>

	<p>We are therefore not in agreement with the Council's estimates in terms of requirement to 2030 as this would provide for a gross undersupply of sites for the city. We are therefore in support of a blended approach to housing development.</p> <p>Land around Summerside can contribute to this choice.</p>
<p><i>10.Creating Sustainable Communities</i></p>	<p>The desire to increase the number of new homes built in Edinburgh is welcomed and supported. The simple assumption that using 'the limited space in our city to ensure the creation of sustainable communities' is not accepted or evidenced in any way by the Monitoring Report.</p> <p>This issue also needs to be seen in the context of the overall requirement and demand for housing in the city from all sources. However, the Council's estimates in terms of requirement to 2030 would provide for an undersupply of sites. We are therefore in support of a more blended approach to housing development.</p> <p>The simplest way of relieving pressure and providing choice will be to increase the stock of available housing in order to meet projected household and student numbers in the city. South East Edinburgh is an appropriate location for residential family accommodation, relieving pressure on stock elsewhere in the city and allows re-locations and flexibility in the market.</p>
<p><i>11.Delivering more affordable homes.</i></p>	<p>The Council's aspirations to provide 20,000 new affordable dwellings in the city up to 2030 is noted and supported.</p> <p>Increasing the Affordable Housing quota to 35% essentially requires a ratio of affordable to market housing of 1:2 rather than the current 1:3. This has implications for viability and delivery, particularly given the reliance on more difficult and costly brownfield sites.</p> <p>The Council's approved Strategic Housing Investment Plan (SHIP) 2020-2025 highlights the significant challenges associated with fulfilling the Council's commitment to deliver 20,000 affordable homes over the next 10 years, including securing both land and finance.</p> <p>The new LDP requires to address the shortfall in supply, particularly given the need to deliver in the region of 2,000 affordable homes every year in accordance with the SHIP programme. The SESplan 2 examination acknowledged that new land would require to be released to meet the demand for affordable housing.</p> <p>Delivery of this quantum of development will require more land to be identified in locations such as South East Edinburgh and this site at Summerside. In order to meet the 35% affordable housing objective, the Council will need to take a more realistic and flexible policy to allocation as part of a blended housing land approach.</p>
<p><i>12.Building our new homes and infrastructure</i></p>	<p>We are not in agreement with this section of the Main Issues Report or the preferred approach being taken by the Council which discriminates against locations such as South East Edinburgh.</p> <p>The proposal to base City Plan 2030 on targets within SDP1 and HND A2 is therefore open to question and interpretation, for reasons as set out in the MIR itself.</p> <p>On this basis, and in addition to 20,800 affordable houses, the market housing target is 22,600 units. This is a gross underestimate over the plan period.</p> <p>Regarding delivery, the City Council considers that there is currently sufficient land for 47,000 houses. Of this 9,200 has no consent and 16,900</p>

	<p>is brownfield or windfall supply. It is not considered that this constitutes a robust or generous supply.</p> <p>The Council's Housing Study is sub divided into two parts which are internally inconsistent and do not relate to equivalent sub-divisions or sectors in the city. In terms of brownfield analysis there are 23 Assessment Areas.</p> <p>The brownfield Urban Area Site Assessment identifies 142 sites with development potential and a notional density capacity of 16,900-27,000 units. Based on Figure 4 Estimated Site Capacities, this is considered a gross overestimate of urban brownfield capacity and underestimates the difficulties of delivering such land.</p> <p>The assessment of potential housing land sites is not competent and not properly considered.</p> <p>Regarding Greenfield housing the methodology is 'partially based' on Strategic Development Areas without justification for their continued existence, as opposed to development corridors.</p> <p>The evaluation methodology is considered to be flawed and inconsistent, both in its content and detail. Accordingly, we have assessed the Sustainable Transport Study the Landscape Study and the Environmental Study and re-evaluated the merits of the site in line with the Greenfield Site Assessment criteria and matrix.</p> <p>RFA has produced an alternative and more accurate and informed scoring for the site, as presented in Appendix 1.</p>
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## Summary

- 1.19 Whilst the site is located on the south east periphery of the city, currently within the green belt, it has rightly been identified by CEC as part of a wider greenfield release for housing development. Such a release would be a logical extension to the city and takes advantage of the existing infrastructure.
- 1.20 This representation objects to the preferred provisions of Choice 12 Building New Homes and Infrastructure. Option 1, preferred by the Council, is a purely brownfield land approach to housing land provision, which is unrealistic and undeliverable. A 'blended' approach to housing land provision is by far the most sensible and achievable option and should be adopted in City Plan 2030.
- 1.21 The site's allocation would meet the underlying aims and objectives of the emerging LDP, in particular:
- It is part of a wider greenfield allocation with definite boundaries, although development at South East Edinburgh will integrate well with and complement the adjoining Shawfair area.
  - Landscape and environmental sensitivities are minimal.
  - Development of the site will maintain the identity, character and landscape setting of nearby settlements and prevent coalescence.

- Development of the site will avoid significant loss of landscape-scale land identified as being of existing or potential value for the strategic green network.
- Existing public transport services and bus stops are located on the eastern boundary.
- The site sits on the South East Transit Corridor.
- The Core Path network and dedicated cycle lanes exist along Old Dalkeith Road.
- The site is within walking distance to local convenience services and to the emerging Shawfair Park employment cluster.
- The site is well positioned to maximise development in accordance with the City Mobility Plan and the Sustainable Transport Strategy.
- The site lies in a marketable area with high level of demand for private housing and need for affordable housing.

1.22 The landowner is committed to liaising with both the City Council and Transport Scotland in order to find the best solution to future development and to agree a future strategy for development and phasing through a masterplanned approach.

## Appendix 1 – Revised Greenfield Site Assessment

**Table A5 – Promoter’s Greenfield Site Assessment (for Summerside site)**

SDP1 SDA AREAS		
Does the site fit within an area identified as a strategic development area?		Not Relevant or appropriate to this LDP review
ACTIVE TRAVEL		
Does the site support travel by foot to identified convenience services?		Yes <i>The site is within walking distance of local convenience services. Agreed that the bust Old Dalkeith Road is perhaps a barrier to accessibility, but can easily be mitigated.</i>
Does the site support travel by foot to identified employment clusters?		Yes <i>The site is within walking distance to the emerging Shawfair Park employment cluster (600m). CEC’s assessment criteria states assessment should include “existing and committed employment clusters”, yet CEC dismisses the proximity to Shawfair Park, and marks this category as ‘no’?</i>
Does the site have access to the wider cycle network?		Yes <i>As identified by CEC this area of the Drum South site has access to the wider cycle network.</i>
Can the site support active travel overall through appropriate intervention?		Yes <i>The site is within walking distance to the emerging Shawfair Park employment cluster (600m). The site is within walking distance to local convenience services. The Corel Path network lies directly to the east of the site. Both sides of Old Dalkeith Road possesses a dedicated cycle lane linking to the wider cycle network. The site is well positioned to maximise development in accordance with the City Mobility Plan and the Sustainable Transport Strategy. The site sits on the South East Transit Corridor.</i>
PUBLIC TRANSPORT		
Does the site support travel by public transport through existing public transport network accessibility and capacity?		Yes <i>The site is located adjacent to a bus route and bus stops are immediately adjacent to the site (citybound) and 180m to the north (southbound). CEC marks this category for Drum South as ‘no’?</i>
Is the site potentially served by an identified public transport intervention project which is deliverable in the plan period to serve and accommodate development?		Yes <i>The site supports travel by public transport based on an identified major intervention deliverable within the plan period. This intervention would serve the wider south-east corridor of the city along Old Dalkeith Road and improve accessibility from this area.</i>



COMMUNITY INFRASTRUCTURE		
Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?		No
Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?		No
If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?		Yes <i>Significant area of new housing is proposed in the South East and this would support the development of a new High School and Primary Schools.</i>
LANDSCAPE CHARACTER		
Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?		Yes <i>Scope for development has been identified by CEC on this site due to its lack of visibility from the surrounding landscape.</i>
GREEN NETWORK		
Would development of the site avoid significant loss of landscape-scale land identified as being of existing or potential value for the strategic green network?		Partially <i>The site may be considered of value for the strategic green network, due to lying within an area identified as a green network opportunity in Edinburgh itself and adjacent to the City of Edinburgh Bypass.</i>
FLOOD RISK.		
Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?		Yes <i>The site has no SEPA-identified areas of medium to high flood risk/for flood management.</i>
SUMMARY COMMENTS		
Is the site suitable for development?		Yes <i>The site is suitable for development.</i>