

Customer Ref: 00009 Response Ref: ANON-KU2U-GP8Y-F
Name: Ian Gallacher
Response Type: Agent / Consultant
On behalf of: West Craigs Ltd

Supporting Info: Yes
Email: igallacher@iceniprojects.com

Choice 1 A

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

Short Response: Not Answered

Explanation: Not Answered

Choice 1 B

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

Short Response: Not Answered

Explanation: Not Answered

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Choice **1 C**

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

Short Response

Explanation

Choice **1 D**

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

Short Response

Explanation

Choice **1 E**

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

Short Response

Explanation

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Choice **1 F**

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

Short Response

Explanation

Choice **1 F**

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

Short Response

Explanation

Choice **1 G**

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

Short Response

Explanation

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Choice 1 H

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

Short Response

Explanation

Choice 2 A

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

Short Response

Explanation

Choice 2 B

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

Short Response

Explanation

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Choice 2 C

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

Short Response

Explanation

Choice 2 D

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

Short Response

Explanation

Choice 3 A

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

Short Response

Explanation

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Choice **4 A**

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

Short Response

Explanation

Choice **4 B**

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

Short Response

Explanation

Choice **5 A**

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

Short Response

Explanation

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Choice 5 B

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

Short Response

Explanation

Choice 5 C

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

Short Response

Explanation

Choice 5 D1

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

Short Response

Explanation

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Choice 5 D2

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

Short Response

Explanation

Choice 5 E

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

Short Response

Explanation

Choice 6 A

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

Short Response

Explanation

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Choice **6 B**

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

Short Response

Explanation

Choice **7 A**

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

Short Response

Explanation

Choice **7 B**

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

Short Response

Explanation

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Choice **7 C**

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

Short Response

Explanation

Choice **7 D**

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

Short Response

Explanation

Choice **8 A**

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

Short Response

Explanation

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Choice **8 B**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

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Choice 9 A

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

Short Response

Explanation

Choice 9 B

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

Short Response

Explanation

Choice 10 A

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

Short Response

Explanation

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Choice **10 B**

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

Short Response

Explanation

Choice **10 C**

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

Short Response

Explanation

Choice **11 A**

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

Short Response

Explanation

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Supporting Info Yes

Name Ian Gallacher

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Response Type Agent / Consultant

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Choice 11 B

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

Short Response Not Answered

Explanation Not Answered

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Choice **12 A**

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

Short Response

Explanation

This Choice presents the Council’s preferred options in terms of how many new homes Edinburgh needs, who delivers the land required for these homes, and how they will be delivered in the most sustainable way. Within the City Plan 2030 Housing Study (Jan 2020) Table 1 - Scenarios of Need and Demand 2019-2032 (HNDA2) confirms that, under the adopted Wealth Distribution Scenario, housing need and demand for the City of Edinburgh for the period 2012-2032 is 81,685 homes. Accounting for the 14,511 housing completions between 2012 - 2019, Edinburgh’s remaining housing need and demand for the period 2019 to 2032 is 67,174. Within this context Choices for City Plan 2030 presents two housing supply target options: 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 (31,772) less completions between 2012 and 2019 (9,184). Alternative Option: 52,800 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HNDA 2 Strong Economic Growth Scenario (41,116) less completions between 2012 and 2019 (9,184). Either option would fall some way short of meeting housing need and demand in full. Despite the Housing Study identifying Edinburgh’s housing need and demand for the plan period as 67,174 the Choices 2030 document provides no justification as to why this target cannot be met. It is assumed this is a result of the Council’s commitment to deliver 20,800 affordable homes between 2019-2032, a figure significantly below the need for 44,586 affordable homes within the same period, as identified by HNDA2 (and specifically referenced within the Housing Study). Having identified a preferred housing supply target, the Choices 2030 document then calculates how much land the emerging plan must provide. It calculates the total land available for housing as follows:

Category	Value
Edinburgh’s Potential Housing Land (2019) Land identified in housing land audit for affordable housing	6,100
Land identified in housing land audit for market housing	14,800
Other land in housing land audit (without consent)	9,200
Potential urban area land identified through Housing Study	16,900
Total potential land available for housing	47,000

In short, CEC consider there to be sufficient land for c 30,100 homes (based upon the 2019 Housing Land Audit). However we note that around 25% of this land (c 7,468 homes) is recognised by CEC as being constrained. This calculation also includes potential for an additional 16,900 homes on land within the urban area as identified by the Housing Study, which we consider below.

Category	Value
Market Affordable	14,800
Total Housing Supply Target	43,400
Current Land Supply	30,164
Effective	22,696
Constrained	7,468
Additional land to find (+10% flexibility)	17,600

To deliver these additional 17,600 homes, three potential spatial strategies are proposed:

- Option 1: Delivery by the Council and its partners within the urban area
- Option 2: Delivery through market housing by releasing greenfield land
- Option 3: A blended approach

CEC advocates Option 1 – Delivery by the Council and its partners within the urban area. In support of this the Choices document identifies 275 hectares of current employment land as the only locations for future housing development. The success of this approach depends upon a range of commercial factors largely out with the Council’s control, indeed the Choices document specifically recognises that “this approach may not be financially viable” and will “require a significant CPO programme to ensure land comes forward”. It is notable that of the 275 hectares of urban land identified as potentially suitable for housing-led development, only 11 hectares is vacant and ready for development whilst only 30 hectares benefit from planning permission. The remainder of the land is currently in active alternative use – predominantly business/employment related. It is worth noting that the subject site, whilst allocated for

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business led mixed development, it is not currently in active use. The priority given to urban as opposed to greenfield land is recognised as a means of making efficient use of existing infrastructure and services. However, if City Plan 2030 wishes to deliver the 67,174 homes required to meet Edinburgh’s remaining housing need and demand then Option 1 - Delivery by the Council and its partners within the Urban Area will not realistically achieve this. An alternative approach must be pursued if Edinburgh’s housing need and demand is to be met. In response to Question 12A, West Craigs Ltd has expressed support for Option 3 – A Blended Approach which proposes a mix of urban area and greenfield land to deliver new homes. The Choices document proposes “a mix of the urban area land (approx. 11,000 units) and greenfield land (approx. 6,600 units)”. Whilst this submission supports Option 3, West Craigs Ltd considers that the alternative housing supply target option of 52,800 homes between 2019-32 must be adopted, albeit recognising that this option remains below the unmet housing need and demand from 2019 to 2032 identified by HNDA2. By adopting the alternative housing supply target the land to be allocated by the emerging City Plan can be calculated as follows: Housing Supply Target 52,800 10% flexibility 5,280 Housing Land Requirement 58,080 Effective Supply 22,696 Land to be allocated in City Plan 2030 35,384 Assuming that the five potential greenfield sites identified by the Choices document are released – providing indicative development capacity of 6,600 – greenfield land with capacity for a further 18,000 homes must be identified in order to meet housing need and demand during the plan period. For the reasons presented, West Craigs Ltd supports Option 3 - A Blended Approach but amended in order to allocate around 35,000 homes on both Brownfield and Greenfield sites.

Choice 12 B1

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

Short Response: Not Answered

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

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Choice **12 B5**

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

Short Response

Explanation

Choice **12 B6**

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

Short Response

Explanation

Choice **12 B7**

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

Short Response

Explanation

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Choice **12 B8**

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

Short Response

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

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

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Supporting Info

Yes

Name

Ian Gallacher

Email

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Response Type

Agent / Consultant

On behalf of:

West Craigs Ltd

Choice 12 BX

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

Short Response

Not Answered

Explanation

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:

Supporting Info

Name

Email

Response Type

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

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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 We support this Choice in the MIR and agree that West Edinburgh should be promoted for development given the existing public transport infrastructure in this part of the City. We note this Choice states that not all land within the area will be allocated for development, however reference is made to two specific areas – Norton Park and Crosswinds Runway. Clearly, existing allocations in the adopted LDP should be considered also – our client’s site being one such example. Choice 14 states that a range of uses could be considered in West Edinburgh, including residential, office, industry and hotel use – in accordance with our client’s proposals for these sites

Choice **14 B**

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

Short Response

Explanation

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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

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

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Choice 15 C

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

Short Response

Explanation

Choice 15 D

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

Short Response

Explanation

Choice 15 E

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

Short Response

Explanation

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Choice 15 G

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

Short Response

Explanation

Choice 16 A1

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

Short Response

Explanation

Choice 16 A2

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

Short Response

Explanation

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Choice **16 A3**

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

Short Response

Explanation

Choice **16 A4**

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

Short Response

Explanation

Choice **16 A5**

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

Short Response

Explanation

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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? - Do you have an office site you wish us to consider in the proposed Plan?

Short Response

Explanation

Choice 16 B

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

Short Response

Explanation

Choice 16 C

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

Short Response

Explanation

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Choice 16 E1

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

Short Response

Explanation

Choice 16 E2

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

Short Response

Explanation

Choice 16 E3

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

Short Response

Explanation

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Choice 16 E4

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

Short Response

Explanation

Choice 16 E5

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

Short Response

Explanation

Choice 16 E6

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

Short Response

Explanation

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Choice 16 E7

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

Short Response

Explanation

Choice 16 E8

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

Short Response

Explanation

Choice 16 EX

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

Short Response

Explanation

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Choice 16 F

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

Short Response

Explanation

Choice 16 G

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

Short Response

Explanation

Choice 16 H

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

Short Response

Explanation

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Yes

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Response Type

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City Plan Team
The City of Edinburgh Council
Waverley Court G.2
4 East Market Street
Edinburgh
EH8 8BG

30 April 2020

IG/W CRAIGS
BY EMAIL

Dear Sir / Madam

CITY PLAN 2030 – MAIN ISSUES REPORT

IBG EAST LAND / EDINBURGH GATEWAY– WEST CRAIGS LTD

This representation is submitted on behalf of West Craigs Ltd in respect of the land in the attached plan (REF LOC_02D – appendix 1). We have referred to this site as “IBG east LAND and EDINBURGH GATEWAY”.

Our client would like to promote this site for a residential led mixed-use development in the emerging City Plan 2030 – comprising residential, Classes 4 / 5 / 6 and Class 7 hotel use. Please refer to appendix 2 for a high-level indicative masterplan of the comprehensive development of the sites.

Background

In the adopted LDP the sites are all allocated within the International Business Gateway (Emp 6) Special Economic Area (Policy Emp 2-8). Within this allocation there is reference to housing development being considered a “supporting use” for the economic led proposal on the site.

We note that a planning application is still pending consideration for another part of the IBG allocation (ref NOD-EDB-003). This application has been called in by the Scottish Government for determination. The application remains live with a decision expected in due course as we understand it. For the avoidance of doubt this proposal is a separate proposal from this application.

The proposals currently being considered by Scottish Government include business and employment uses; residential uses for around 396 housing units; hotels and ancillary uses including retail, financial and professional services, food and drink, non-residential institutions, assembly and leisure; and associated works including car parking, servicing, access and public realm.

A Proposal of Application Notice was submitted on the subject site and completed in 2016 for a mixed-use development (ref 16/00927/PAN). No planning application has been submitted to date on the back of this PoAN.

Site & Surroundings

As considered above these sites are already part of the settlement and allocated for development. It is a highly accessible location in terms of both the tram stop at Gogar and Edinburgh Gateway train station. Furthermore, there are various opportunities to link into existing and proposed cycle and pedestrian routes. We would refer you to the IBG Accessibility Review (appendix 3) completed by ARUP (April 2020) which considers this further, this is attached as a separate appendix.

Whilst the sites are part of the overall IBG allocation it does clearly sit as a separate development site due to existing landscape and physical features. There is subsequently the opportunity for the

comprehensive development of a residential led mixed-use development to come forward on these sites without compromising the wider IBG proposals. We note that a requirement of IBG was that CEC completed a Masterplan of the entire area, thus far they have failed to undertake any comprehensive masterplan of IBG.

Whilst we note that the intention of IBG was to create an office led development there is very little demand for substantial office floorspace in this part of Edinburgh beyond what is already proposed. Edinburgh Park can currently provide circa 1,000,000 sf of office space, with a further 122,518 sq m proposed in the IBG West application (considered above). In this regard there is unlikely any chance that there will be demand for additional office floorspace on our client's land.

Indeed, CEC's own Commercial Needs Studies (see appendix 4) approved by Housing & Economy Committee on 6/6/19 states (at para 3.8 page 4) that Edinburgh would only need a maximum of 106,650 sqm of decentralised offices until 2030, and that report clearly pre-dated the likely reduction in demand caused by COVID 19. In Para 3.4 on page 3 it further states that 81,000 sq m of industrial land is required by 2030, and part of our client's land adjacent to the tram depot appears ideal for that use.

We note that Crosswinds Developments Ltd are presently progressing a PoAN (ref 19/05303/PAN) for a mixed-use development – including residential. There is little detail available on this proposal at present, however it is worth noting that this significant proposal abuts our client's site at the northern edge. The Crosswinds proposal is on land included within Edinburgh Airports Permitted Development Rights zone (for airport use only).

Main Issues Report

We would like to promote these sites for a residential led mixed-use development of approximately 500 units, Class 4 / 5 / 6 uses and Class 7 hotel use. Whilst there is no clear route in making representations to the Main Issues Report (MIR) in the promotion of existing allocations in the adopted LDP we have considered some of the specific Choices raised in respect of this site.

We should add that a significant proportion of these sites are brownfield development opportunities, as well as existing allocations in the LDP.

Choice 12 - Building our new homes and infrastructure

This Choice presents the Council's preferred options in terms of how many new homes Edinburgh needs, who delivers the land required for these homes, and how they will be delivered in the most sustainable way.

Within the City Plan 2030 Housing Study (Jan 2020) Table 1 - Scenarios of Need and Demand 2019-2032 (HNDA2) confirms that, under the adopted Wealth Distribution Scenario, housing need and demand for the City of Edinburgh for the period 2012-2032 is 81,685 homes. Accounting for the 14,511 housing completions between 2012 - 2019, Edinburgh's remaining housing need and demand for the period 2019 to 2032 is 67,174.

Within this context Choices for City Plan 2030 presents two housing supply target options:

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 (31,772) less completions between 2012 and 2019 (9,184).

Alternative Option: 52,800 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HNDA 2 Strong Economic Growth Scenario (41,116) less completions between 2012 and 2019 (9,184).

Either option would fall some way short of meeting housing need and demand in full. Despite the Housing Study identifying Edinburgh's housing need and demand for the plan period as 67,174 the Choices 2030 document provides no justification as to why this target cannot be met. It is assumed this is a result of the Council's commitment to deliver 20,800 affordable homes between 2019-2032,

a figure significantly below the need for 44,586 affordable homes within the same period, as identified by HNDA2 (and specifically referenced within the Housing Study).

Having identified a preferred housing supply target, the Choices 2030 document then calculates how much land the emerging plan must provide. It calculates the total land available for housing as follows:

Edinburgh's Potential Housing Land (2019)	
Land identified in housing land audit for affordable housing	6,100
Land identified in housing land audit for market housing	14,800
Other land in housing land audit (without consent)	9,200
Potential urban area land identified through Housing Study	16,900
Total potential land available for housing	47,000

In short, CEC consider there to be sufficient land for c 30,100 homes (based upon the 2019 Housing Land Audit). However we note that around 25% of this land (c 7,468 homes) is recognised by CEC as being constrained. This calculation also includes potential for an additional 16,900 homes on land within the urban area as identified by the Housing Study, which we consider below.

	Market	Affordable	Total
Housing Supply Target	22,600	20,800	43,400
Current Land Supply			30,164
Effective			22,696
Constrained			7,468
Additional land to find (+10% flexibility)			17,600

To deliver these additional 17,600 homes, three potential spatial strategies are proposed:

- Option 1: Delivery by the Council and its partners within the urban area
- Option 2: Delivery through market housing by releasing greenfield land
- Option 3: A blended approach

CEC advocates Option 1 – Delivery by the Council and its partners within the urban area. In support of this the Choices document identifies 275 hectares of current employment land as the only locations for future housing development.

The success of this approach depends upon a range of commercial factors largely out with the Council's control, indeed the Choices document specifically recognises that "this approach may not be financially viable" and will "require a significant CPO programme to ensure land comes forward".

It is notable that of the 275 hectares of urban land identified as potentially suitable for housing-led development, only 11 hectares is vacant and ready for development whilst only 30 hectares benefit from planning permission. The remainder of the land is currently in active alternative use – predominantly business/employment related. It is worth noting that the subject site, whilst allocated for business led mixed development, it is not currently in active use.

The priority given to urban as opposed to greenfield land is recognised as a means of making efficient use of existing infrastructure and services. However, if City Plan 2030 wishes to deliver the 67,174 homes required to meet Edinburgh's remaining housing need and demand then Option 1 - Delivery by the Council and its partners within the Urban Area will not realistically achieve this. An alternative approach must be pursued if Edinburgh's housing need and demand is to be met.

In response to Question 12A, West Craigs Ltd has expressed support for Option 3 – A Blended Approach which proposes a mix of urban area and greenfield land to deliver new homes. The Choices document proposes "a mix of the urban area land (approx. 11,000 units) and greenfield land (approx. 6,600 units)".

Whilst this submission supports Option 3, West Craigs Ltd considers that the alternative housing supply target option of 52,800 homes between 2019-32 must be adopted, albeit recognising that this option remains below the unmet housing need and demand from 2019 to 2032 identified by HNDA2.

By adopting the alternative housing supply target the land to be allocated by the emerging City Plan can be calculated as follows:

Housing Supply Target	52,800
10% flexibility	5,280
Housing Land Requirement	58,080
Effective Supply	22,696
Land to be allocated in City Plan 2030	35,384

Assuming that the five potential greenfield sites identified by the Choices document are released – providing indicative development capacity of 6,600 – greenfield land with capacity for a further 18,000 homes must be identified in order to meet housing need and demand during the plan period.

For the reasons presented, West Craigs Ltd supports Option 3 - A Blended Approach but amended in order to allocate around 35,000 homes on both Brownfield and Greenfield sites.

Choice 14 – Delivering West Edinburgh

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.

We support this Choice in the MIR and agree that West Edinburgh should be promoted for development given the existing public transport infrastructure in this part of the City. We note this Choice states that not all land within the area will be allocated for development, however reference is made to two specific areas – Norton Park and Crosswinds Runway.

Clearly, existing allocations in the adopted LDP should be considered also – our client’s site being one such example. Choice 14 states that a range of uses could be considered in West Edinburgh, including residential, office, industry and hotel use – in accordance with our client’s proposals for these sites.

Summary

These are all part of an existing allocation in the adopted LDP and part of the settlement, a large proportion of the sites are brownfield. It is part of the IBG allocation in the LDP, this allocation includes an element of residential use within the business led strategy. This site given its location offers a sustainable and logical residential & business (Class 4, 5 & 6) led opportunity given the linkages already in place with public transport in close proximity. The LDP description of IBG as “international business development” is meaningless and should not be replicated in the City Plan 2030. The proposed planning conditions in NOD-EDB-003 do not impose any restriction on which type of occupiers can trade within IBG.

Whilst this representation relates to three sites they are interlinked due to their location and proximity to existing public transport infrastructure. They can all provide for a highly sustainable development – within the existing settlement boundary and party brownfield sites.

We trust this assists at this time and would be pleased to discuss any of this further at your convenience.

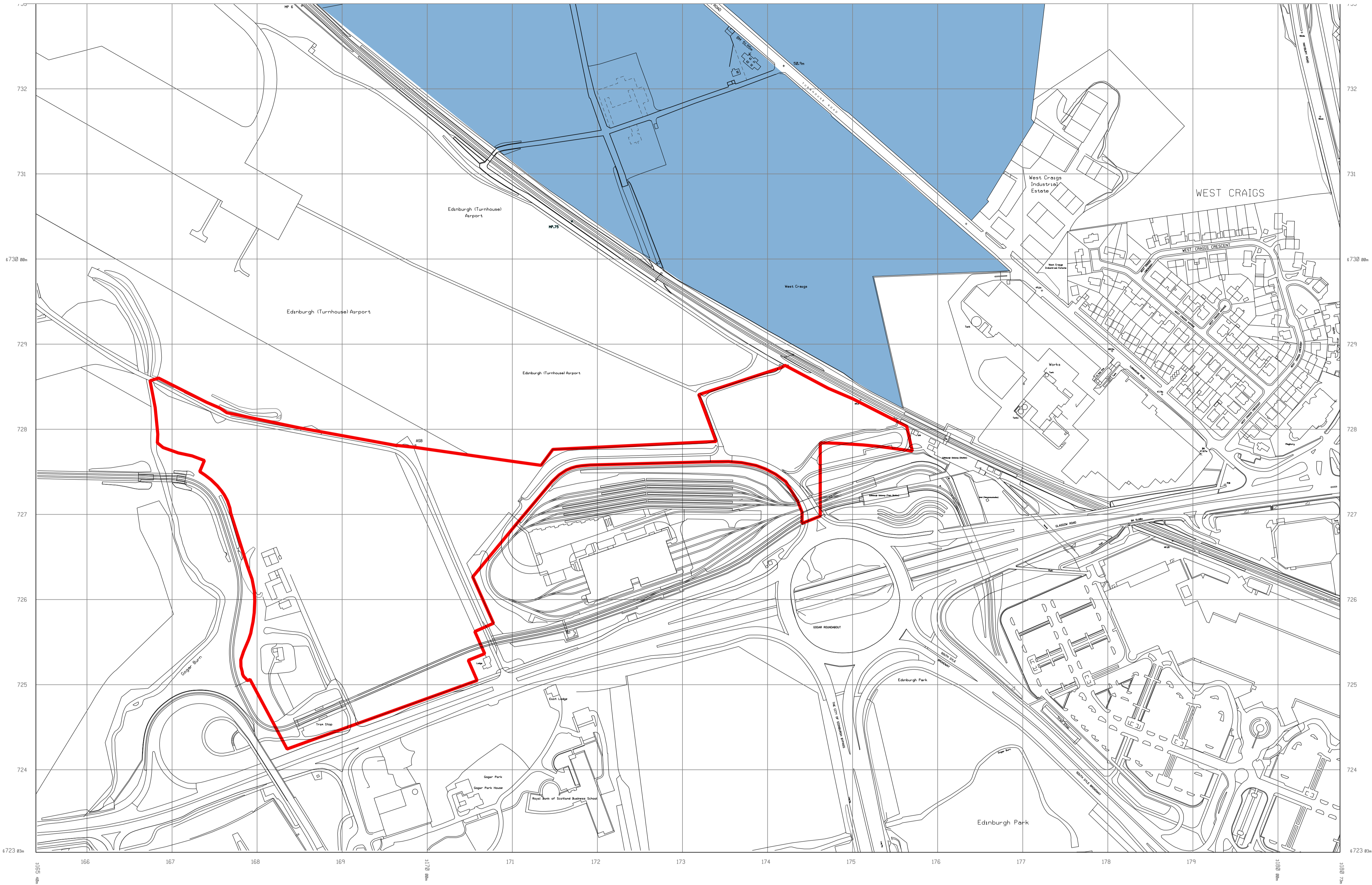
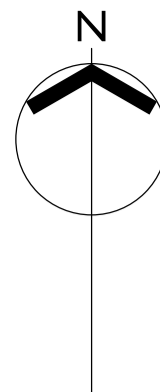
Yours sincerely,





Ian Gallacher
DIRECTOR

cc. Mr S Buchanan, West Craigs Ltd
Mr C Whelton, Burness Paul LLP

Enclosures: Appendix 1 - Location Plan (ref LOC_02D)
Appendix 2 - Masterplan (REF AS 14 Rev D)
Appendix 3 - High Level Accessibility Report (ARUP)
Appendix 4 - Commercial Needs Studies (CEC Housing & Economy
committee 6/9/19)



LEGEND

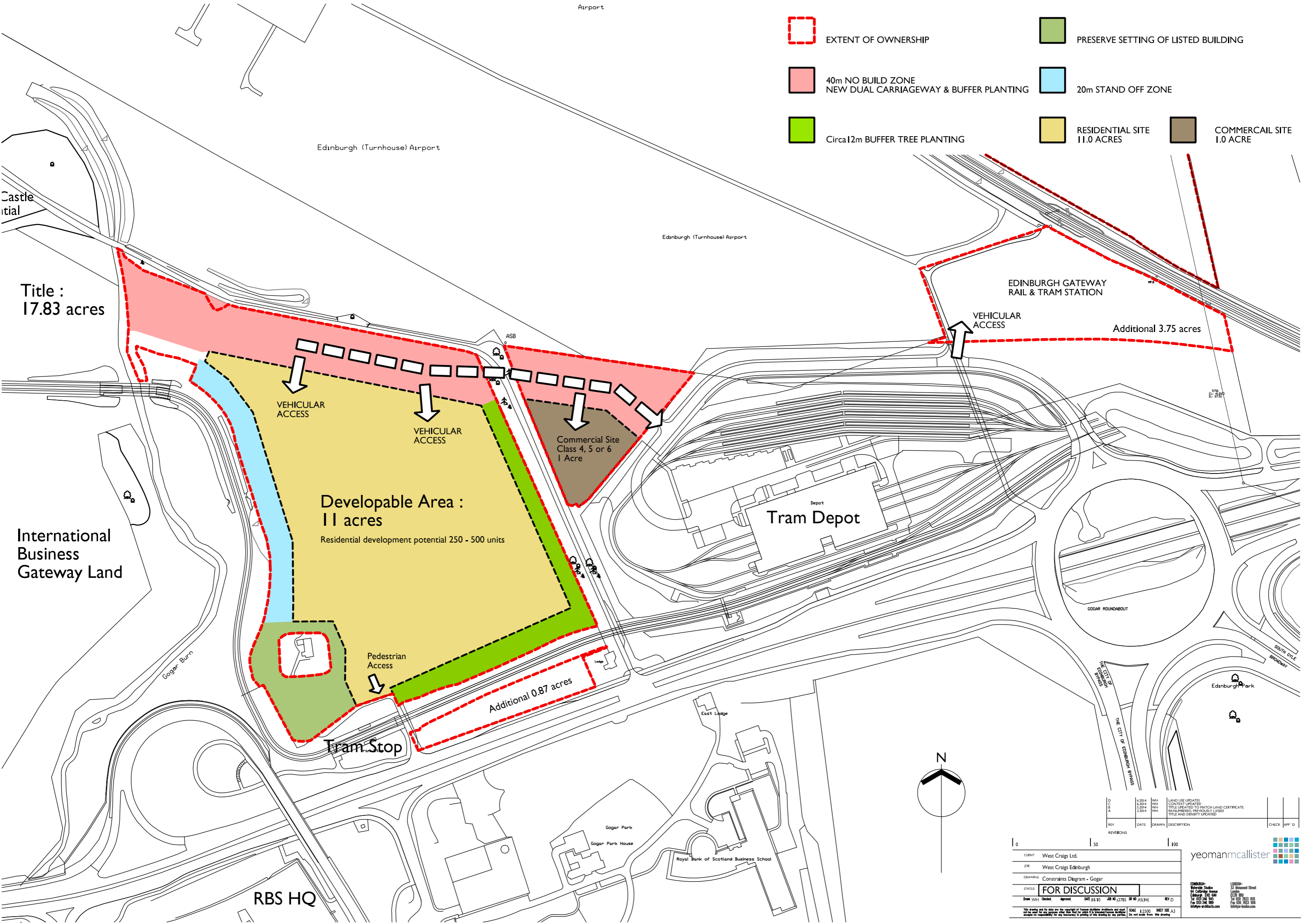
-  Application Site Boundary
-  Area of adjoining land owned by the Applicant

REV	DATE	DRAWN	DESCRIPTION	CHECK	APP'D
D	4.20	WH	ADJUSTMENTS FOR SUBMISSION		
C	10.14	WH	FINAL ADJUSTMENTS FOR PPA SUBMISSION		
B	6.14	WH	APPLICATION BOUNDARY UPDATED		
A	6.14	WH	CONTEXT UPDATED		



CLIENT	WEST CRAIGS Ltd.
JOB	WEST CRAIGS, EDINBURGH
DRAWING	IBG SOUTH LAND LOCATION PLAN
STATUS	PLANNING
DATE	December 2013
Drawn	WH
Approved	WH
Checked	WH
JOB NO	s/2785
DR NO	LOC(02) REVISION D

SCALE 1:2500 SHEET SIZE A1
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Title :
17.83 acres

International
Business
Gateway Land

Edinburgh (Turnhouse) Airport

Edinburgh (Turnhouse) Airport

EDINBURGH GATEWAY
RAIL & TRAM STATION

VEHICULAR
ACCESS

Additional 3.75 acres

VEHICULAR
ACCESS

VEHICULAR
ACCESS

Commercial Site
Class 4, 5 or 6
1 Acre

Tram Depot

Developable Area :
11 acres
Residential development potential 250 - 500 units

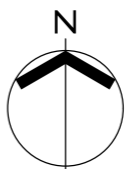
Pedestrian
Access

Additional 0.87 acres

Tram Stop

RBS HQ

Gogar Park
Gogar Park House
Royal Bank of Scotland Business School



REV	DATE	DRAWN	DESCRIPTION	CHECK	APP'D
4.2014	WH		LAND USE UPDATES		
4.2014	WH		CONTENT UPDATED		
5.2014	WH		TITLE UPDATED TO MATCH LAND CERTIFICATE		
3.2014	WH		RE-NUMBERED, PREVIOUSLY L1000		
			TITLE AND DENSITY UPDATED		

0 50 100

CLIENT	West Craigs Ltd.
JOB	West Craigs Edinburgh
DRAWING	Constraints Diagram - Gogar
STATUS	FOR DISCUSSION
Drawn	WH
Checked	
Approved	
DATE	11/10
JOB NO	12785 DR NO AS14
REV	D

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SCALE: 1:2500 SHEET SIZE: A3

West Craigs Ltd
International Business Gateway
East, Edinburgh
Accessibility Review

Final | 21 April 2020

This report takes into account the particular instructions and requirements of our client.




It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 254681-00

Ove Arup & Partners Ltd
13 Fitzroy Street
London
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United Kingdom
www.arup.com

ARUP

Document verification

Job title		International Business Gateway East, Edinburgh		Job number	
				254681-00	
Document title		Accessibility Review		File reference	
Document ref					
Revision	Date	Filename	Reportcl Draft 1 IBG Site Accessibility Review.docx		
Draft 1	20 Apr 2020	Description	First draft		
			Prepared by	Checked by	Approved by
		Name	C Latto	C Latto	C Latto
		Signature			
Final 1	21 Apr 2020	Filename	Reportcl Final 1 IBG Site Accessibility Review.docx		
		Description	Final		
			Prepared by	Checked by	Approved by
		Name	C Latto	C Latto	C Latto
		Signature			
		Filename			
		Description			
			Prepared by	Checked by	Approved by
		Name			
		Signature			
		Filename			
		Description			
			Prepared by	Checked by	Approved by
		Name			
		Signature			

Issue Document verification with document



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1 Introduction

Ove Arup & Partners Ltd (Arup) has been commissioned by West Craigs Ltd (WCL) to review the accessibility of the eastern-most section of the adopted Local Development Plan (LDP) allocation Emp 6 for the International Business Gateway (IBG). The site is located between the Transport for Edinburgh Tram Depot on Myreton Drive and the Gogarburn Tram Halt to the north of the A8 corridor. This is referenced as ‘the site’ and indicated by Graphic 1.1 below.

Graphic 1.1 Extract of LDP Figure 13 – West Edinburgh Overview Map



This review considers the accessibility of the site by active and sustainable forms of travel in accordance with the movement hierarchy identified and supported by national and local guidance, including the Society for Chief Officers of Transport in Scotland (SCOTS).

This review identifies that the site is accessible by the existing and proposed sustainable forms of travel and will support sustainable development in accordance with the LDP Policy Tra 1 and that the site accords with the LDP principles for the earlier phasing of IBG sites located within 250m of a tram stop.

The cumulative and site-specific transportation opportunities and requirements for any development proposals within the site will be identified at the appropriate time through a separate formal Transport Assessment in accordance with current guidance, the LDP Policy Del 1 and the associated transportation policies such as Tra 1, Tra 2, Tra 3 and Tra 8.

The remainder of the report summarises the accessibility of the site to the existing and forthcoming pedestrian, cycle and public transport facilities and services.

2 Principles of Access

2.1 IBG Access Road to Gogar Interchange

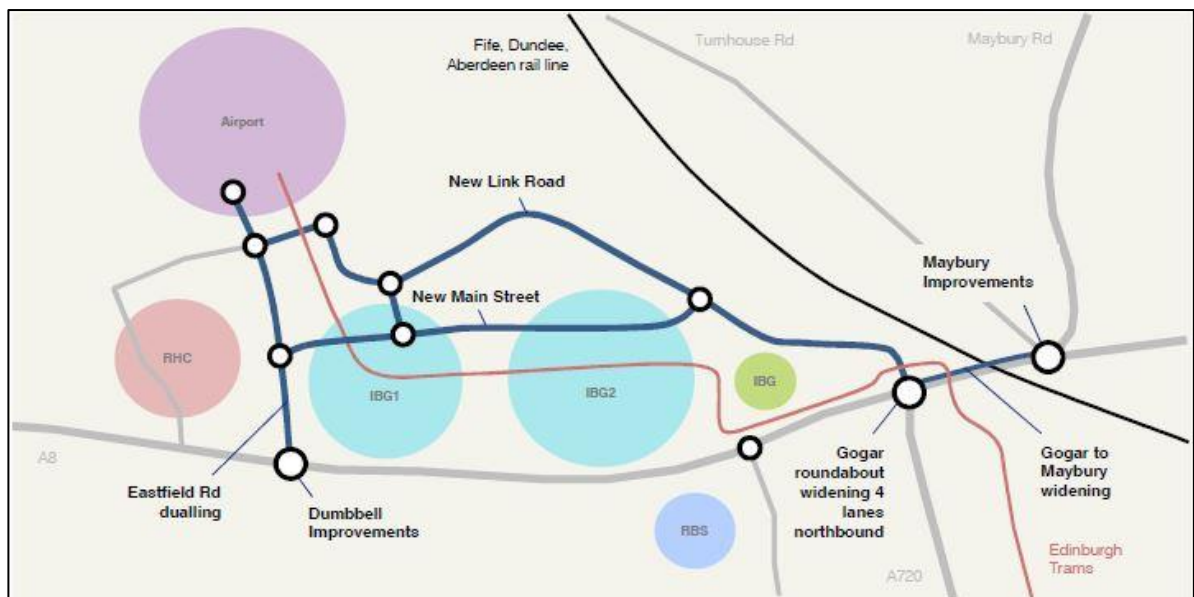
The Council's 2016 West Edinburgh Transport Appraisal Refresh report (WETA Refresh) provides the cumulative transport assessment that supports the allocated development within west Edinburgh, including the IBG sites and the expansion of the Edinburgh Airport operation.

In conjunction with a series of multi-modal transport interventions identified within WETA Refresh and the Council's Action Programme for allocated development within the West Edinburgh Contribution Zone, Figure 6.7 and Section 6.6.1 of the WETA Refresh identify the 'New Link Road' and the 'New Main Street', which will provide the main access routes for the predicted Airport growth and the IBG development respectively.

These access routes will also function as key active and sustainable travel routes and for placemaking. These routes will converge at the upgraded Gogar Interchange.

Graphic 2.1 below is an extract from Figure 6.7 of the WETA Refresh. This indicates some of the identified transportation interventions including the New Main Street that will serve the IBG allocation and the site, which is referenced as 'IBG' in the graphic below.

Graphic 2.1 Extract from Figure 6.7 of WETA Refresh



2.2 Additional Access Routes

Graphic 2.1 also indicates the existing tram line that serves the Airport and the IBG allocation, including the site. Details of the site's accessibility to the tram services are considered later within this review.

In addition to the key access and accessibility route of the New Main Street, further access routes are available and will be utilised to maximise the accessibility and inclusion of the site. These are explored further in this review and account for the transportation interventions attributed to the development within the residential LDP allocations HSG 19 (Maybury) and HSG 20 (Cammo). The Maybury and Cammo allocated and committed development sites are indicated in Graphic 1.1.






3 Review of Accessibility

3.1 The Site

Graphic 3.1 indicates the key transport facilities in the vicinity of the site that form the basis of the accessibility review and that inform the walk isochrones indicated by Figure 1. These account for the existing, the allocated and the committed transportation interventions that will be delivered through a combination of public funding streams, such as City Deal, and through developer obligations.

Graphic 3.1 Localised Access Routes



- Multi-modal Route:** 
- Green Corridor:** 
- Combined Pedestrian/Cycle Route:** 
- Bridge over Railway Line:** 
- The Site:** 

3.2 Pedestrian Accessibility

The site benefits from direct access to the A8 corridor and the combined A8 cycleway. Figure 1 indicates that the site is within an 800m walk to the adjacent bus, tram and rail halts, offering direct access to the wider catchment.

The site will also be accessible on foot to the facilities and services within the western phases of the IBG, the RBS HQ, The Gyle, Edinburgh Park, West Craigs and the facilities being delivered as part of the HSG 19 Maybury development that includes two 5-acre parks, a new primary school and local amenities.

3.3 Cycle Accessibility

The isochrones for cycling will extend up to 5 km and include the majority of west and south-west Edinburgh and the city centre. The site is located adjacent to the A8 cycleway that leads onto other designated cycle routes and quiet routes throughout Edinburgh and the central belt of Scotland.

These routes are being enhanced by the allocated and committed cycle schemes being delivered by the Council, other public sector funding streams and through developer obligations. These include the West Edinburgh Active Travel Network (WEATN), the Green Corridor and the railway bridge, the Cammo Walk upgrade and the ongoing enhancement and completion of the A8 cycleway.

3.4 Public Transport Accessibility

The Council recognises the importance of delivering and planning reliable and frequent public transport services as the sustainable alternative to the private car for medium and longer distances. The Council recognises the benefits of locating mixed use higher density development within the West Edinburgh Strategic Development Area, which is currently highly accessible by different forms of public transport and that will benefit from allocated and committed enhancements to the public transport provision.

The importance of public transport within west Edinburgh has resulted in the Governments' and the Council's joint commitment to £38M through the Edinburgh City Deal towards public transport improvements in the vicinity of the site.

3.4.1 Service Buses

The site is located to the north of the A8 corridor and is served by various service buses operated by several operators in Edinburgh and in central Scotland. These frequent buses serve a large catchment within Edinburgh city and the central belt and offer direct access from the site by way of the accesses onto the A8 cycleway and the directional Gogarburn bus stops on the A8.

Table 3.1 summarises the current A8 service buses that will serve the site, where Figure 1 indicates the location of the adjacent buses stops on the A8.

The eastbound bus stop is located well within 400m of the site and the westbound bus stop is located west of the RBS signalised access within 800m of the site via the RBS overbridge.

Table 3.1 Existing A8 Service Buses

Bus Operator	Service No.	Key Locations Served
Lothian Buses	20	Hermiston Gait-Edinburgh Park Station-The Gyle
	63	South Queensferry-Kirkliston-Newbridge-Ratho Station-The Gyle-Edinburgh Park-Sighthill
	200	Airport-Corstorphine-Drylaw-Granton-Leith (Ocean Terminal)
	300	Airport-RBS-The Gyle-Edinburgh Park-Sighthill-Slateford-Edinburgh City Centre-Newington-Cameron Toll
	400	Airport-Ingliston P&R-RBS HQ-The Gyle-Sighthill-Wester Hailes-Colinton-Oxgangs-Gracemount-Moredun-Niddrie-Fort Kinnaird
	N22	(Night Bus) Airport-Edinburgh Park-Broomhouse-Balgreen-Edinburgh City Centre-Leith (Ocean Terminal)
Lothian Country Buses	275	Livingston-Pumpherton-Broxburn-The Gyle-Edinburgh Park
	EX2	Linlithgow-Springfield-Ratho Station-Edinburgh
	X17	Fauldhouse-West Calder-Livingston-Broxburn-Edinburgh
	X18	Whitburn-Armadale-Bathgate-Broxburn-Edinburgh
	X38	Linlithgow-Winchburgh-Kirkliston-Edinburgh
First Bus	X24	Livingston-Pumpherton-Broxburn-Newbridge-Ratho Station-Edinburgh
	X25/N25	Blackridge-Armadale-Gathgate-Livingston-Broxburn-Newbridge-Ratho Station-Edinburgh
	X38	Stirling-Falkirk-Linlithgow-Winchburgh-Kirkliston-Newbridge-Ratho Station-Edinburgh
Scottish Citylink	900/N900	Glasgow-Euro Central-Newbridge-Ratho Station-Edinburgh
	909	Stirling-Grangemouth-Bo'ness-Ratho Station-Edinburgh
Bo'ness and Area Community Bus Association	C19	Bo'ness-Ratho Station-Edinburgh

Other services are available within an 800m walk of the site at the Royal Bank of Scotland HQ.

In addition, the phased delivery of the IBG and the expansion of Airport operations are expected to facilitate additional and/or revised bus services throughout west Edinburgh, which would directly serve the site via the New Link Road and New Main Street.

The site is and will be highly accessible to frequent service buses that serve a large catchment within the central belt and throughout Edinburgh.

3.4.2 Edinburgh Trams

Figure 1 indicates that the Gogarburn tram halt is located adjacent to the south-west corner of the site and would be accessed via a combined pedestrian/cycle route. The Edinburgh Gateway tram halt is located within 800m of the site and accessed via the main access route that would form part of the New Main Street corridor. The site fully accords with the LDP principles to support the earlier phasing of IBG sites located within 250m of a tram stop.

The trams operate a 7-minute frequency during the day and a 10-minute frequency before 0700 and after 1900. The tram provides access to the Airport and to a wide catchment to the west of Edinburgh including The Gyle, Edinburgh Park, Hermiston, Sighthill, Broomhouse, Stenhouse, Haymarket and the city centre.

The Council is currently in the process of delivering the extension of the tram network from York Place to Leith and Newhaven and is considering additional routes as part of the emerging City Mobility Plan and 2030 City Plan.

3.4.3 Rail Services

Figure 1 indicates that the Edinburgh Gateway railway station is located within 800m of the site and like the Edinburgh Gateway tram halt, will be accessed via the main site access route that would form part of the New Main Street corridor.

Edinburgh Gateway railway station is located on the East Coast Mainline and is currently served by the Fife Circular services and to locations such as Inverness, Perth, Kirkcaldy, Dundee and Arbroath. All services deliver direct access to Edinburgh city at Haymarket and to Waverley, which deliver access to the national catchment.

4 Summary and Conclusion

4.1 Summary

Ove Arup & Partners Ltd has been commissioned by West Craigs Ltd to consider the accessibility of the eastern-most section of the adopted Local Development Plan allocation Emp 6 for the International Business Gateway, located between the Edinburgh Tram Depot on Myreton Drive and the Gogarburn Tram Halt north of the A8 corridor.

The review considers the accessibility of this element of the allocated IBG site by active and sustainable forms of travel in accordance with current national and local guidance and the established movement hierarchy of pedestrians, cyclists and public transport.

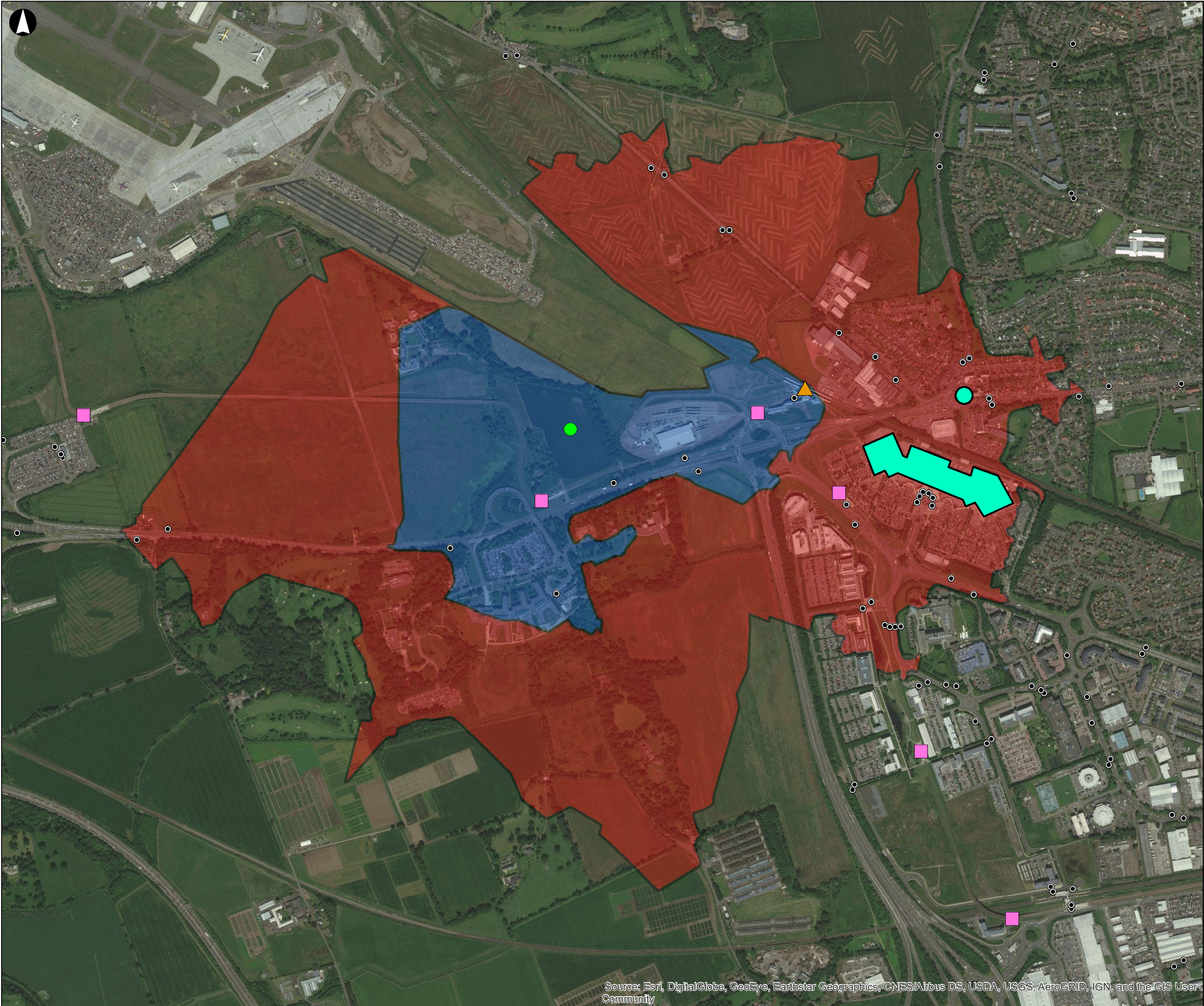
The review considers the site in the context of the existing and the forthcoming transport interventions and the allocated and approved development in west Edinburgh.

4.2 Conclusion

This review identifies that this section of the IBG site is highly accessible by the existing and the forthcoming active and sustainable forms of travel, and that the site is accessible to a significant catchment within central Scotland and within Edinburgh city.

This review concludes that the direct access to active and sustainable travel supports sustainable development within the site in accordance with the LDP Policy Tra 1 and that the site fulfils the LDP principles to support the earlier phasing of IBG sites located within 250m of a tram stop.

Figures



Legend

- Site Centroid
- 800m Isochrone
- 1600m Isochrone
- Tram Stop
- ▲ Railway Station
- Bus Stops
- Convenience Facility

I2	17-04-20	AMcK	CL	CL
Rev	Date	By	Chkd	Appd

ARUP

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 www.arup.com

Client
West Craigs Ltd

Project Title
IBG East Site

Drawing Title
Pedestrian Isochrone

Scale at A3
1:11,000

Role
Consultancy

Information

Arup Job No 254681-00	Rev I2
---------------------------------	------------------

Name
IBG Figure 1

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Housing and Economy Committee

10.00am, Thursday 6 June 2019

Commercial Needs Studies

Item number	
Executive/routine	Executive
Wards	All
Council Commitments	2, 4, 11

1. Recommendations

- 1.1 It is recommended that the Committee:
 - 1.1.1 Notes the findings of the commercial needs study reports.

Paul Lawrence

Executive Director of Place

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E-mail: david.cooper@edinburgh.gov.uk | Tel: 0131 529 6233

Contact: Ben Wilson, Team Manager, Planning

E-mail: ben.wilson@edinburgh.gov.uk | Tel: 0131 469 3411

Commercial Needs Studies

Executive Summary

- 2.1 The Council has commissioned a commercial needs study covering four commercial property markets in Edinburgh – industrial; office; retail and leisure; and visitor accommodation – to inform City Plan 2030 and other relevant Council policies and strategies. The key findings of the four studies are summarised in this report and potential Council interventions in response are set out.

2. Background

- 2.1 To inform the preparation of City Plan 2030 and other relevant Council policies and strategies, the Council has commissioned needs studies for four commercial property markets in Edinburgh: industrial; office; retail and leisure; and visitor accommodation. The studies were carried out by the property consultancy Ryden with support from Cushman & Wakefield, GVA (now Avison Young), JLL, and Roderick MacLean Associates.
- 2.2 The findings of these studies are summarised below; the full reports are available as background papers.
- 2.3 On [1 November 2018](#) the Housing and Economy Committee considered a report on demand for business class hotel accommodation in Edinburgh. It was noted that a report setting out the findings of the Commercial Needs Study would follow.

3. Main report

Industrial

- 3.1 Edinburgh has experienced the loss of traditional industries, while new demand for industrial space has arisen from the emergence of new sectors. Industrial premises in Edinburgh support an estimated 30,000 jobs. There is currently 1.08 million square metres of industrial space in Edinburgh across 1,214 units, representing a mean occupier size of 890 square metres. 93% of existing stock is of a very basic standard and most existing stock is at least 40 years old and nearing obsolescence.

- 3.2 There is steady demand for industrial property in Edinburgh and rents have risen. Demand is focused on strategic locations on the city's edge with good transportation links. Since 2010, take-up has averaged 43,227 square metres per annum, with around two-thirds of take-up for units of less than 464 square metres. The current vacancy rate is 4.9% (52,733 square metres across 54 units). It is believed that there is latent demand due to the poor quality and limited supply of available stock which is obliging potential occupiers to curtail expansion/relocation plans or look outwith Edinburgh for suitable space.
- 3.3 The speculative development of new industrial space has been gradual. 7,290 square metres of new stock was added in 2017. A further 25,420 square metres holds planning consent – if this was developed, this would represent a 2.3% increase on the existing stock. Meanwhile, existing inner urban industrial estates are being redeveloped for alternative uses such as residential. The overall theme is a replacement of ageing inner city stock with modern edge-of-city stock. All new completed and proposed industrial developments are on the city's western edge.
- 3.4 The study predicts that over the 12 year period 2018 to 2030 a total of 81,000 square metres of new industrial space (requiring 27 hectares of land) will be required. This represents 7.5% of the city's existing industrial stock being replaced with new buildings in appropriate locations, with a further 7.5% refurbished to meet current standards.

Office

- 3.5 The city's office stock currently totals 1.85 million square metres across 1,413 buildings (averaging 1,310 square metres). 46% of space is in the city centre, 20% in West Edinburgh, 5% in the Waterfront, 1% in South East Edinburgh, and 28% elsewhere. Most stock is of middling quality. Since 1980, annual take-up of office space has averaged 66,500 square metres, with 64% of take-up in the city centre (69% in the most recent 12 month period). The average deal size is 390 square metres representing accommodation for around 25 to 50 workers. The technology sector is an increasingly important source of demand.
- 3.6 Since 2000, office completions in Edinburgh have averaged 37,000 sqm annually (31,400 square metres in 2017) but with a protracted slump in the aftermath of the economic downturn with just 88,943 sqm completed over the past five years. The vast majority of space under construction is pre-let. There is a pipeline of 538,000 square metres of office space with planning permission but only 10% of this is in the city centre where as noted demand is concentrated. 97,552 square metres of office space has been lost to alternative uses in the past five years representing a net loss over the period of 8,609 square metres (albeit with an improvement in quality).
- 3.7 The current available office supply of Edinburgh is 207,663 square metres representing an 11% vacancy rate. While this appears high, this includes a significant supply of stock that is approaching obsolescence. Some properties that are counted as available stock are already earmarked for redevelopment. The supply of modern office space is much more constrained, particularly in the city centre which as noted accounts for most demand. Most demand is for mid-market

space (in terms of location, quality, and cost) and new development (which focuses on prime requirements) is not addressing this demand. Mean rents outwith the city centre are generally too low to make new development viable.

- 3.8 It is projected that over the period 2019 to 2030 Edinburgh will need between 17,000 and 29,600 square metres (net) of net office space annually to meet demand, with a median requirement of 23,300 square metres. It is considered most likely that 70% of this requirement will be in the city centre with 30% elsewhere, reflecting proven demand. This represents a total increase in stock up to 2030 of 248,850 square metres in the city centre and 106,650 square metres elsewhere. There is a shortage of suitable sites in the city centre while out-of-centre locations may need support to emerge as office hubs. Alternative uses such as hotels have in some cases “crowded out” office developments.

Retail and leisure

- 3.9 The retail sector is being disrupted by the growth of online shopping and the consolidation of the market into dominant locations at the expense of weaker locations. Landlords and developers are diversifying from retail into leisure. Edinburgh has largely overall benefited from these trends. Vacant rates in the city centre are very low at 4.2%; town centre vacancy rates are also low. This reflects the findings of regular surveys conducted by the Council which show town centres as performing relatively strongly.
- 3.10 Edinburgh is currently ranked 5th to 9th nationally for retail mix and 13th nationally for retail turnover. The Edinburgh St James development is expecting to elevate Edinburgh to 8th nationally for turnover as well as shift the city centre’s retail and leisure focus eastward.
- 3.11 Convenience retailers across Edinburgh are under-trading (i.e. turnover is lower than would be expected given floorspace) and there is limited leakage outwith Edinburgh. Even in a high growth scenario there is not expected to be any spare convenience expenditure capacity in Edinburgh before 2028, i.e. no additional convenience floorspace is projected to be required before 2028 at the earliest. Any additional space delivered would primarily displace trade from existing stores.
- 3.12 Expenditure on comparison goods is projected to rise, albeit by 2028 one-third of this expenditure is expected to be made via the Internet. There is limited leakage of comparison goods expenditure outwith Edinburgh while the city benefits from inflows. The city centre, the Gyle Centre and Fort Kinnaird are the dominant comparison goods expenditure locations with the city centre attracting 52% of the city’s comparison goods expenditure. Commercial centres account for a further 34%. If growth in comparison goods expenditure is low, it is projected that there will be no capacity for additional comparison goods retail floorspace before 2028 at the earliest. If growth is high, it is projected that there will be capacity for additional comparison goods retail floorspace after 2023. The city centre is the location most capable of generating additional expenditure into Edinburgh and reducing leakage.

Visitor accommodation

- 3.13 Edinburgh's visitor accommodation supply includes 13,180 hotel bedrooms; 2,327 hostel beds; 1,488 serviced apartments; and 1,300 guesthouse bedrooms, representing a total supply of 15,968 bedrooms/units. This is supplemented with other forms of accommodation such as student halls of residence let out during the summer and self-catering options such as caravan parks and camping grounds. Existing stock is primarily concentrated in central Edinburgh.
- 3.14 The hotel market of Edinburgh has experienced strong growth in occupancy and rates in recent years while supply has also seen strong net growth (with 3.3% average annual net growth in hotel room supply). Since 2012, the hotel bedroom stock has risen by 3,139 (24%). Budget hotels account for 78% of new bedrooms opening between 2012 and 2018. Budget hotels account for a plurality of the city's hotel bedroom stock (34%); just 8% of the total supply is five-star. With the exception of the Thistle King James Edinburgh hotel, which was demolished to facilitate the development of Edinburgh St James, the loss of hotel space in recent years has been confined to the closure of small boutique hotels which have largely been converted into residential units.
- 3.15 In recent years, there has been rapid growth in the number of residential properties available to rent as short-stay accommodation, most notably via the platform Airbnb. This does not appear to have damaged mainstream occupancy rates.
- 3.16 The pipeline includes 61 new/extended hotels totalling 6,338 bedrooms (albeit not at all of these are expected to be delivered) along with 250 additional serviced apartments and 36 additional hostel bedrooms. Future demand prospects are also considered to be positive. It is projected that there is market capacity for 7,890 new hotel bedrooms in Edinburgh by 2030 including 2,750 under construction or confirmed, representing capacity for 5,140 additional hotel bedrooms not currently programmed. The pipeline is primarily concentrated in central Edinburgh with smaller clusters of development in Leith and West Edinburgh; there is a lack of additional sites for development in the city centre.
- 3.17 Business and conference tourism are key drivers of the city's visitor accommodation market. The Edinburgh International Conference Centre has identified that during major events local hotels can prove unable to provide enough bedrooms to meet block bookings.

Conclusion

- 3.18 The key messages from the four reports are:
- 3.18.1 The industrial market is experiencing steady demand with a low vacancy rate. The speculative development of new space is sluggish and existing space is being lost to alternative uses. New industrial space is needed in well-connected locations on the periphery of Edinburgh. Industrial demand spills into surrounding local authorities and some demand is expected to be accommodated in (for example) west West Lothian and north Midlothian.

- 3.18.2 The office sector has seen a slump in completions in recent years. The headline vacancy rate of 11% masks substantial stock approaching obsolescence. The city centre accounts for 70% of projected demand but only 10% of the development pipeline. Most demand is for mid-sized space of middling rents but the market is focused on prime rent properties.
- 3.18.3 The retail sector is generally performing well despite national sectoral challenges. The city is not expected to require any additional convenience floorspace before 2028 at the earliest given the existing pipeline and current levels of under-trading; the requirement for additional comparison goods floorspace is dependent on demand growth. For town centres, a watching brief should be taken up to forestall any budding issues.
- 3.18.4 The visitor accommodation market is performing strongly with high rates and occupancy despite recent growth in supply. The main challenge facing the sector from a development perspective is a lack of sites in the city centre.
- 3.19 These issues will inform City Plan 2030. In addition to its response as statutory planning authority, the Council could potentially undertake other interventions to address these issues as set out below:
- 3.19.1 In the industrial sector, there is potential for the Council to directly deliver additional stock, building on the success of the East Hermiston Business Park funded by the City Strategic Investment Fund. Other potential opportunities for new industrial development have been identified in locations such as Seafield, Russell Road and Newcraighall.
- 3.19.2 In the office sector, the Council can directly deliver office space suitable for a mix of occupiers as is planned at Fountainbridge. Regeneration projects such as the Granton Waterfront may present an opportunity to deliver additional office space aimed at mid-market occupiers. More strategically, the Council has a role in helping unlock future office development locations such as West Edinburgh and encouraging the development of office space suited to growth sectors such as technology.
- 3.19.3 There is less need for direct intervention in the retail sector with the Council already playing a major part in this sector via its role in the Edinburgh St James project. Elsewhere in the city centre, there is a role for the Council in helping ensure the west end of Princes Street remains vibrant as the centre of retail gravity shifts eastward. For retail centres where the Council has an ownership stake such as Westside Plaza and the former Muirhouse Shopping Centre, current and planned improvement works can help ensure the sustainability of these in the face of pressures on the retail sector. Regeneration projects led by the Council such as Fountainbridge and Granton Waterfront that will deliver additional retail space must be carefully designed to avoid under-trading. Funds such as the Town Centre Fund can help deliver small-scale improvements to retail centres, which initiatives

such as the mooted Town Centre Business Improvement District can help address issues.

- 3.19.4 There is less need for direct intervention in the visitor accommodation sector. With limited development opportunities suitable for hotels remaining in the city centre, developer interest may shift to alternative locations such as West Edinburgh; there is a broader role for the Council in helping unlock these locations. In the case of specific challenges such as the shortage of high-calibre visitor accommodation in the Exchange District identified by the Edinburgh International Conference Centre, further Council action may be required to identify and implement solutions, albeit this is a specific issue rather than reflective of city-wide issues.

4. Next Steps

- 4.1 The findings of the four studies will be used to inform the preparation of City Plan 2030 as well as other Council policies and strategies as appropriate.
- 4.2 Specific proposals on Council interventions as set out at paragraph 4.18 will form separate reports to the Committee for consideration.

5. Financial impact

- 5.1 There are no direct financial impacts from this report. Potential interventions by the Council with financial implications as mentioned above would be assessed on a case-by-case basis with reports brought to the Committee as appropriate.

6. Stakeholder/Community Impact

- 6.1 Significant engagement with stakeholders has been carried out by the authors of each study to inform the conclusions of the studies.
- 6.2 Seminars on each of the studies were held with stakeholders between October 2018 and February 2019 to disseminate the results and glean feedback.

7. Background reading/external references

- 7.1 [Industrial needs study](#)
- 7.2 [Office needs study](#)
- 7.3 [Retail and leisure needs study](#)
- 7.4 [Visitor accommodation needs study](#)

8. Appendices

None