

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 Taylor Wimpey (TW) support this ambition, however, the question is too vague and lacking in detail. We agree that there will be an important role for new development to play in connecting to and assisting the delivery of this new network. However, the network will be used by a wide variety of users and it would not be reasonable to expect new development to deliver this network in its entirety. The land necessary for such a network will be in many different ownerships.

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 While in principle we support the providing of green and blue infrastructure, not enough information is provided here to understand what is proposed. More specific details will be essential to understanding the policy which is envisaged. There are also possible tensions with this priority and others such as building at greater density and encouraging brownfield development. We consider that the following matters will be important to consider when drafting any policy on this: 1. We have experienced issues where Local Authority requests and Scottish Water's vesting requirements do not align, particularly with regard to the level of surface water storage. Given the requirement at question 1H for green spaces to have management arrangements in place, it will be essential that any policy asks are aligned with Scottish Water's vesting requirements. 2. Green and blue infrastructure can be difficult to deliver on smaller and brownfield sites. 3. Green and blue infrastructure can take up lot of space, this is one challenge in delivering the density aspirations if these are to be calculated using gross area.

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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 Agree in principle however there is not enough information provided to understand what this might mean in future practice, compared to current practice. There is already detailed policy and guidance in respect to water management, taking account of climate change. It is unclear whether the Council are seeking to impose additional more onerous requirements, in which case there should be consultation before proposed in policy. Further information is required.

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 Agree in principle. The current policy is not easily comprehensible and can be interpreted to be over-protective of poor quality open-space, potentially preventing any positive change, which would allow higher quality, more useable open space to be delivered.

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Choice 1 E

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

Short Response

Explanation We don't object to larger areas in principle but there is inadequate detail on how this might be used. It is also unclear how this would be made compatible with the desire to have increased densities and measure these by gross area. We would like to understand how the Council intends to balance these two priorities. It will also be necessary to consider the relative benefits of this approach and the longer walks it may require for some residents compared with providing a series of smaller spaces which may be more quickly accessed. Quality of open space provided will also be a consideration. We would be keen to work with the Council on how appropriate open space could be provided as part of new communities. However, at this stage the idea is too nebulous and evidence of how other options and potential policy conflicts have been considered is unclear.

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 Yes, but this should not be at the expense of identifying sufficient land to meet housing requirements. The Council's aspiration to significantly increase the density of new development is perhaps in conflict with providing land for allotments. It should also be considered that the demand for allotments is mostly driven by people not having sufficient garden space to grow food. There is a reasonable argument that medium density housing with back gardens means that less allotments will be required.

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Choice **1 F**

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

Short Response

Explanation

Choice **1 G**

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

Short Response

Explanation

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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 Sufficient detail has not been provided, although it is stated that the Council favours factoring on behalf of the private landowner(s) but will consider adoption should sufficient maintenance resources be made available. We currently tender for the maintenance of open space within our developments and this is then paid for through resident's factor fees. This approach is acceptable, however it can only apply to open space that is of an appropriate size and scale to serve residents of the new development. It is not appropriate for our customers to pay for the long-term maintenance of new large greenspaces that are for the public benefit through factor fees. If the Council is envisaging these spaces to be akin to existing provision, such as the Meadows, then they should be adopted and maintained and managed in a similar manner, and paid for through Council Tax. Furthermore, existing open space provision should be taken into account when applying this policy, if a new site is within suitable distance of a large park, then additional large-scale parks should not be required to be provided on-site.

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Choice **2 A**

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

Short Response

Explanation Yes. In principle we agree these are relevant considerations. However, many of these issues are covered by other policies and regulatory regimes such as building standards. It will be important that any policy avoids duplication and adding unnecessarily to the significant amount of documents already required to accompany applications, adding time and cost to both their preparation and processing. Any policy changes will have to be realistic and rooted an understanding of what is technically feasible. For detailed design details we consider building standards is the most appropriate regulatory regime. Previously introduced policies covering technical areas in a general manner such as on district heating have lacked clarity and an adequate level of understanding of the issues they are dealing with. Caution should be exercised before extending the scope of the planning system and the workload of those who administer it.

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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 Taylor Wimpey supports the aspiration to ensure the efficient use of land. We would also agree that areas with good public transport accessibility provide opportunities for increased densities. However, applying rigid minimum densities regardless of local context and what prospective residents want is not an appropriate strategy. A vertical mix of uses may be appropriate in some locations. However, this policy needs to be applied realistically. In most cases a significant mix of uses in one building would not be viable or mutually desirable for occupiers. This policy is not a substitute for allocating enough land for the varied development needs of the city. Read in conjunction with the consultation paper our understanding is that what is being asked is our views on the following: 1. A minimum density of at least 65dph for all housing development; 2. A minimum density of 100dph in as yet unspecified locations which are identified for 'higher density development'; 3. A policy on a vertical mix of uses. We deal with these three matters below in turn. Minimum Density of 65dph We understand that this minimum density figure has been taken by using the average density of new developments which were built between 2008 and 2018. It is unclear why the average density of what has been built to date should be applied as a strict minimum henceforth. A more detailed review of these figures also raises questions over the number provided and their general applicability. The actual average figure is 63dph. When 2019 completions are included (i.e. 2008-19) this decreases to 59dph. When disaggregated, the average for brownfield sites is 70dph and 30dph for greenfield sites based on the gross area. Also the average density delivered over recent times hides a very significant variety ranging from 6 to 56dph. Different approaches will be suited to different locations. Indeed, some of the evidence in the Housing Study points to this. The Leith Fort development is held up as an exemplar despite having a density of just 50dph and the density assumptions for some of the larger brownfield sites such as Redford Barracks and Seafield are 26 and 29dph respectively. For many brownfield sites very little supporting infrastructure is required. Just 15% of the Brownfield sites completed between 2008 and 2019 are larger than 100 dwellings. On many of the smaller sites the gross area will be little more than the building footprint in many instances. In contrast greenfield sites require new roads, footpaths, recreation space, SUDS infrastructure and landscape buffers. In addition, greenfield housing often provides greater scope for providing gardens. We are therefore not persuaded that a minimum of 65dph is appropriate for greenfield sites. The strict application of this minimum density is also likely to have a number of consequences which are not desirable e.g. 1. It will reduce the variety of homes which can be built as it will require flats and terraced housing almost exclusively. Larger properties with garden space will be much more difficult to provide within such strict limitations. 2. Households will not be able to find a home which meets their needs. Many families upon finding that flatted accommodation is no longer suitable for their needs will struggle to find larger homes in Edinburgh and are forced to move further afield. 3. The variety of homes which can be built and hence the proportion of potential home buyers which will be catered for will be reduced. This will impact upon the number of new homes which can be built. Which would be counterproductive at a time when Edinburgh faces significant housing shortages and requires a step change in delivery. A wide variety of new homes will also help to drive more moves in the second-hand market increasing choice and competition following a sustained period of low transactions volumes. While densities should be delivered to most efficiently and effectively use the

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Response Type: Developer / Landowner
On behalf of: Taylor Wimpey

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limited space within our city, they are best established through a masterplanning / design approach in response to their context, as well delivering the types of homes, places and communities in which people want to live. In other words, if a well-considered masterplan-led approach is taken, then standards shouldn't necessarily be rigidly applied if what is proposed can be properly justified. It should be recognised that while the historic high densities across the city in the form of tenements / terraces / colonies etc. worked in the past, they emerged at a time when parking and prescribed open space standards did not exist and private amenity space requirements were a judgement. Recently, Edinburgh has adopted a positive approach relative to maximum parking standards, however, open space (including amenity space) is still a little rigid in our view. It should also be recognised that many developers have standard house-types, which built in volume significantly reduces build costs and therefore price point. It is not a straightforward or quick for housebuilders to modify these house-types, given the proven saleability of that product, and the need to ensure the same for new products. To simply bring in a minimum density requirement of 65dph with immediate effect would significantly delay the delivery of housing in the short-term. It is our strong view there needs to be continuing dialogue and appropriate flexibility on density in the short to medium term, perhaps with a view to phasing in higher density requirements over a number of years, allowing the market providers to adjust. Careful thought needs to be given to the kind of issues that we have raised above before radical changes are made. We support a strong focus on ensuring the efficient use of land. However, this should not come at the expense of providing a variety of homes for people to live in within the City. If the choice of housing is insufficient, households will move into neighbouring Council areas and commute back into Edinburgh, therefore adding to transport congestion. A Minimum Density of 100dph in Specific Locations We support prioritising certain locations for higher density development. However, this should be done in consultation with those promoting sites for development in identified areas. Requiring a Vertical Mix of Uses There may be appropriate in some locations, such as town centre sites with high footfall. However, these are likely to be the exception. Mixing uses presents challenges with services and multiple mixes of uses across different storeys can add to the requirement for lifts and staircases making developments less viable. Many of the industrial uses on sites identified for residential development are incompatible with housing. The locational requirements of many commercial occupiers are much more specific than for residential uses. Conclusion Overall, we consider that a policy which allows greater flexibility to respond to context and the market for different types of housing is required. We suggest the following wording for a new policy on density. "All new housing sites will be expected to be designed to ensure efficient use of land and optimise housing densities. The appropriate density will depend on local context. The accessibility of the site to public transport and other relevant services, and the need to encourage and support the provision of local facilities necessary to high quality urban living will support increased densities subject to site specific considerations. This should be achieved by using a full range of house types and sizes."

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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 No. We support the ambition but it is not clear why this cannot be done through a combination of existing policies and new place briefs /masterplans. Again, and as is a common theme throughout the options, it is not explained in detail what is being proposed. Any new provision must also be possible within land controlled by the applicant or potentially through contributions to the Council where justified. Delivery of associated infrastructure will therefore be phased. However, contributions need to be fairly and reasonably related to what is proposed and must be necessary for the development to proceed. It will be important that the Council avoids a situation where the delivery of early phases of large sites are stalled because all of the land necessary for a such connections is not in the applicant's control. We are concerned that the Council's assessments of individual sites in the Housing Study in respect to accessibility to active travel are not reasonable – being overly demanding on what constitutes good accessibility. In our view, the Council needs to be bolder in encouraging active travel. For example, the Union Canal is dismissed as being over-capacity for cycle use and other existing routes appear to be dismissed without analysis of potential solutions.

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 Taylor Wimpey accept the principle; however the policy is too vague a proposition to support it. It will be important that policies are drawn up with a clear knowledge of how they will cumulatively impact upon developments. Presenting applicants with an irreconcilable set of policy asks will create uncertainty and add complexity and risk to the planning application process. For instance, there will be an appropriate balance to be drawn between density and amenity and this should be considered on a site by site basis, taking account of surrounding character and uses. Policies should therefore be criteria based and not overly prescriptive.

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Choice 3 A

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

Short Response: Current Building S

Explanation Existing Building Regulations. TW support the ambition to reduce carbon emissions and recognise the role that delivering increasing efficient homes can play in this regard. However, there must national consistency and this is not an issue for local planning policy. It is our firm view that emission standards for new buildings should continue to sit within the Building Standards regulatory regime. Furthermore, current additional standards may become out of date with review of building standards. Particularly so as it will only really begin to have an impact from c. 2024 onwards by which time a further review of building standards will be taking place. There is also a benefit of national consistency to offer economies of scale and avoid costly complexity. It must also be considered that the majority of new housing developments in Scotland are currently only achieving bronze standard, which are considered to be a “good” quality. The technology is not currently available to deliver platinum standards at a viable price, and thus ensure deliverability. In our view, it would be more useful to direct funding towards improving energy efficiency of the existing housing stock, which has a far greater impact on emissions. Significant progress has already been made in reducing emissions through building standards reviews and a period of significant further changes over the next five years is already planned. Adding different targets in the planning system simply complicates matters and will place in jeopardy the efficiencies of scale on new technology which could be achieved by pursuing a pan-Scotland approach.

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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 Taylor Wimpey are keen to engage with local communities and support them in the preparation of Local Place Plans. However, they should not be overused as statutory pre-application is already required for major developments and detailed design policies are already included in policy. We consider that it will be essential that developers and landowners are involved in the creation of design briefs. LPP's must be positively prepared, supporting growth to meet the identified need, and prepared within the current planning policy framework. Care will be needed to ensure that participants are well-informed about constraints and opportunities, to avoid unrealistic expectations and outcomes. Specialist technical input in relation to transport and other disciplines will also be required. It will also be important to avoid delay to what already appears to be an overly-ambitious timetable for the delivery of housing. We object to new development being required to fund new healthcare facilities. We understand that 62 of the 70 GP practices in Edinburgh are privately operated businesses. We fully support the functioning of a well-funded NHS, however, this is funded from general taxation and the purpose of s.75 contributions is clearly not to finance the capital costs of private businesses. We consider it is preferable for developer obligations to remain focused on their current scope.

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 See 4A above – Taylor Wimpey are keen to work with local communities to prepare LPP's. Technical input from other specialisms will also be required.

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Choice 5 A

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

Short Response

Explanation Yes. However, care should be taken in assessing what is required and ensuring that the requirements for new infrastructure are properly justified, reasonable and proportionate.

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 Yes. However, we are concerned that the methodologies for assessing the need for facilities and infrastructure are flawed. For example, the PTAL method for assessing public transport accessibility does not appear fit for purposes. In some cases, it concludes that sites have poor accessibility even when located directly next to high frequency bus routes.

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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 Yes, for large scale developments. It should be recognised in policy that there will be opportunities for smaller scale development to be located in less accessible areas.

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 TW welcome clarity at the plan stage on what infrastructure will be expected to be provided. The requirement for any infrastructure must be properly justified having regard to policy and should be able to be viably delivered. We do not agree with contributions being required towards healthcare facilities that are run as private practices.

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 Disagree. Cumulative contribution zones have not proved to be sufficiently robust to meet the Planning Circular test for reasonableness, proportionality etc because of lack of evidence to justify that the required infrastructure is directly related to the development in question.

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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 We agree that statutory supplementary guidance should no longer be used, which is in any case not supported by the new Planning Act. In our view, it is crucial that all matters, including developer contributions, that have a significant implication for the viability and delivery of housing are included within the LDP and not within Action Programmes or non-statutory guidance. This approach allows for consultation and independent scrutiny, which must be the case for such important matters.

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 Yes but the current methodology for assessing accessibility of public transport and active travel routes seem overly negative e.g. sites next to high frequency bus routes and/or with access to cycling and walking routes are not recognised as such on the basis of what appears to be flawed assessment or a lack of exploration of new opportunities. We accept that walking/cycling routes and public transport are necessary, and there should be more positive consideration of improving existing links or creating new ones.

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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 Yes, as long as the participation is well-informed and realistic. People still need cars for trips where public transport or active travel is not an option. It may be too easy for communities with existing good access to parking to seek that new development does not also benefit. A balance needs to be struck between encouraging behaviour change and proving places, which are attractive and convenient for people to live

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 No. As with the above policies there are very few details on which to base our response. It will be more important that any targets for trips are realistic. The appropriateness of this policy will be dependent the details.

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 No. We consider that the proposed policy is likely to be too prescriptive and should have regard to surrounding character. We support the aim of achieving mixed uses, but that consideration depends on the mix of uses surrounding the site and the market interest/ deliverability of housing on the site. Requiring housing to be delivered on all sites over 0.25ha is unworkable.

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 We agree to the principle of this policy, however this approach may be difficult to implement in practice, as there will be site specific consideration. The land made available would need to be of sufficient size to enable volume housebuilders to deliver high quality housing development and it would need to be viable.

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Choice **11 A**

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

Short Response

Explanation No. Not as a general rule as such a policy would not accord with Scottish Planning Policy paragraph 129, which states; “The level of affordable housing required a contribution within a market site should generally be no more than 25% of the total number of houses”.

Choice **11 B**

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

Short Response

Explanation No. We support the provision of a wide variety of housing types and tenures. Affordable housing sizes will be informed by the Council’s information on need and waiting lists. We support the focus on ensuring family housing is available. However, we do not consider it is necessary to apply prescriptive targets for the mix of market housing. There needs to be sufficient flexibility to respond to variations in demand over time and across different locations. A degree of flexibility is consistent with SPP which states “Planning can help to address the challenges facing the housing sector by providing a positive and flexible approach to development.” (para. 109)

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On behalf of: Taylor Wimpey

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Choice 12 A

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

Short Response: Not Answered

Explanation

We do not support any of the options because none of them are likely to provide the context to deliver sufficient housing to meet Edinburgh's housing need and demand until 2032. However, we could support an alternative to Option 3 (Blended Approach), which allocates much more land for housing than currently proposed. Our response to question 12A is structured to reflect the underlying methodology of establishing how much housing land is required to meet future requirements, following Scottish Planning Policy i.e. 1. Establish housing need and demand i.e. from HNDA 22. Establish the Housing Supply Target (HST) to properly reflect HNDA 23. Establish the Housing Land Requirement by adding 10 - 20% to the HST4. Estimate the amount of housing that can be delivered from the Established Housing Land Supply5. Allocate additional housing land to make up any shortfall between the Established Land Supply and the Housing Land Requirement. Following this, we have undertaken a critique of Options 1, 2 & 3, and finally we propose an "Alternative Option 3" HOUSING NEED AND DEMAND IN EDINBURGH Scottish Planning Policy (para 113) requires plans to be informed by a robust housing need and demand assessment (HNDA). HNDA 2 is the most recent assessment of need and demand in Edinburgh which has been agreed as robust and credible, and we therefore support its use as the basis for establishing the Housing Supply Target for CityPlan 2030. Moreover, in the context of current circumstances, we support the use of the Wealth Distribution Scenario. HNDA 2 identifies the following need and demand in Edinburgh from 2019 - 2032 (taking account of house completions up to 2019):

1. Wealth Distribution:	Affordable Housing - 44,586 units	Private Housing - 22,588 units
	Total - 67,174 units	

Scottish Planning Policy (para 115) indicates that the Housing Supply Target should be reasonable, should "PROPERLY REFLECT" the estimate of housing demand, and should be supported by compelling evidence. As explained below, none of the 3 options presented in the Choices document comes close to meeting the housing need and demand identified in the Wealth Distribution Scenario of HNDA 2. In our view, the approaches suggested are contrary to Scottish Planning Policy in that they do not "properly reflect" the HNDA estimate and are not supported by compelling evidence. There is a reference in the Council's documentation to the other factors involved in setting the housing target, however, it is not explained in any detail why a downward adjustment from the HNDA output is justified having regard to the "wider economic, social and environmental factors, issues of capacity, resource and deliverability, and other important requirements such as the aims of National Parks" required by Scottish Planning Policy. This is an important matter given the historic severe undersupply of housing and housing land in Edinburgh and requires further attention. It is not clear if the Council has considered in any detail how first housing need and demand could be met before deciding a reduced HST was necessary. In this regard the HSTs in Choices could be seen to have been set using a 'back to front' methodology. Recent LDP Examination decisions such as those at Falkirk and Stirling are instructive on this matter. The findings of the Falkirk Reporter are quoted below "I agree with representees that this is not an appropriate approach for the council to have adopted; diagram 1 on page 30 of SPP makes clear that the setting of the housing supply target comes before the identification of land, as does a fair reading of SPP paragraph 120." (Issue 2, para. 35) "In my view it is illogical to take a supply-led approach to the setting of the housing land requirement. The housing land requirement is intended to be the driver for ensuring a sufficiently generous supply of land is available to meet the housing supply target. If the housing land requirement is derived from the identified supply, rather than the opposite way round, the

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On behalf of: Taylor Wimpey

housing land requirement cannot have directly informed decision-making over which sites ought to be allocated.” (Issue, para. 71)Edinburgh has not been in a position recently where it has even attempted to allocate sufficient land to meet its own housing need and demand in full. Instead, a significant proportion of its need and demand has been redistributed to other authorities. As we refer to below, there is no reference in Choices 2030 to meeting any of Edinburgh’s housing need and demand elsewhere.HOUSING SUPPLY TARGETThe Choices document states that Edinburgh’s housing target 2019 to 2032 is: Market Housing - 22,600Affordable Housing - 20,800Total - 43,400THIS COMPARES WITH THE HNDA 2 TOTAL NEED AND DEMAND OF 67,174 HOMES, WHICH IS A SHORTFALL OF 23,774 HOMES. IN OTHER WORDS, CHOICES 2030 IS PROPOSING TO MEET ONLY 65% OF THE NEED AND DEMAND.THE MAIN REASON FOR THIS IS THAT COUNCIL CONSIDER THAT THE 23,786 AFFORDABLE HOMES CANNOT BE PROVIDED FOR. THE DECISION TO THEREFORE IGNORE THIS MASSIVE SHORTFALL IN MEETING THE NEED FOR AFFORDABLE HOUSING IS NOT PROPERLY JUSTIFIED, DOES NOT PROPERLY REFLECT THE HNDA AND, IN OUR VIEW, IS DEEPLY FLAWED.To undersupply housing land in Edinburgh by nearly one third of requirements is likely to have a very significant impact on the housing market over the coming years. The Council acknowledges the current significant shortfall of affordable housing and the proposed strategy can only serve to massively exacerbate the problem. Given that Scottish Planning Policy for delivering more affordable housing hinges on a proportion of market sites being given over to affordable housing, an obvious alternative is to increase housing land release overall, which can accommodate market and affordable homes.If the Council does not intend to distribute any of its housing need and demand to neighbouring Council areas, as has been traditionally the case, then it should aim to have a strategy which meets need and demand within its own boundaries, or at least adopt a strategy that “properly reflects” the HNDA as required by Scottish Planning Policy.We understand the Council’s case for not adopting such a strategy, which is that there is doubt, based on historic completions rates, that the amount of housing actually required can be delivered. This, in our view, is not a reason to suppress the HST. This is because if the HST is suppressed to reflect historic completion rates rather than actual demand, it will mean that there is insufficient land allocated for the market to respond to that demand. In other words, the suppressed HST dictates and constrains delivery.IN OUR VIEW, THEREFORE, CITYPLAN SHOULD SET AN ALL TENURE HOUSING SUPPLY TARGET IN LINE WITH THE HNDA 2 WEALTH DISTRIBUTION SCENARIO I.E. 67,174 HOMES.Moreover, the precise splits between tenures are sensitive to minor changes in variables. The variables can change significantly over time. We therefore consider that the all tenure output of the HNDA should be the primary piece of information which informs the HST. This approach was endorsed by the Reporter at the recent Falkirk LDP Examination (DPEA ref. LDP-240-2), as follows:“I do however acknowledge that needs and demands for different tenures are likely to vary over the course of the plan period. Therefore I reiterate that it is the overall, all tenure housing supply target against which the number of completions and availability of effective land should ultimately be tested, regardless of tenure.” (Issue 2, para. 66) EXISTING (ESTABLISHED) HOUSING SUPPLYThe existing housing supply is made up of two components – effective and constrained sites. Although we agree that sites which are identified as effective in the 2019 Housing Land Audit should be taken into account, we question the number of units which is assumed will be delivered by 2032. This is because the Council appears to have assumed that all effective sites will be developed in their entirety by 2032, when in reality the rate of delivery on some larger sites will mean that the development is unlikely be completed by that date. Homes for Scotland have assessed this matter in detail in their submission to Choices 2030, and have calculated that 21,055 dwellings rather than the 22,696 identified in the Council’s Housing Land Study are likely to come forward. The calculation that HfS have undertaken is robust, based on projecting forward the programming shown in the 2019 HLA for the first 7 years of development. This approach has recently been supported by the Report of Examination on the Aberdeen City & Shire Strategic Development Plan, as follows:“The approach used by Homes for Scotland where the programming of sites is extrapolated beyond the period stated in the housing land audit is well-evidenced with tables showing each site in each authority and market housing area. There will be instances where sites perform better and some which deliver less than the extrapolated method shows but it reasonably carries forward the last known (and agreed) programme of delivery on each site into the

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future. Therefore, I consider that it can be effectively used to predict the amount of the established supply that is considered to become effective during the periods 2027 to 2032 and 2033 to 2040.” (para. 26, p. 193, Issue 14)The Housing Land Study identifies the future delivery of 7,468 houses on constrained sites. This is a highly optimistic assumption given that constrained sites by their nature have impediments to overcome and no identified solution. In some cases we accept that these constraints may be overcome. However, equally sites which are currently considered effective may become constrained over time. Therefore, in our view, only currently effective sites should be relied upon to contribute to the land supply and this approach was also endorsed in the Report of Examination for the Aberdeen City and Shire SDP.THUS, AGAINST THE COUNCIL’S ASSUMPTION THAT THE EXISTING HOUSING LAND SUPPLY WILL DELIVER 30,164 UNITS, WE ARE OF THE VIEW THAT THIS SHOULD BE ASSUMED TO BE 21,055 UNITS.ESTABLISHING THE HOUSING LAND REQUIREMENTSScottish Planning Policy (para 115) requires plans to allocate 10 – 20% more homes than the Housing Supply Target figure to provide generosity and flexibility. The Choices document proposes the lowest level of generosity at 10%. We support this approach but only on the basis that no delivery is assumed from constrained sites as described above and also that a more realistic approach is taken to delivery assumptions from the 142 ‘new’ brownfield sites described in the Housing Study (see below). The Council’s delivery assumptions are highly speculative and optimistic in our view and even if generosity was pegged at 20% it would be too little to account for the risk of the supposed supply not delivering.SO THERE IS A BALANCE TO BE STRUCK BETWEEN THE RELATIVE RISK OF THE ESTABLISHED HOUSING LAND SUPPLY NOT DELIVERING AS PREDICTED AND THE %AGE GENEROSITY. IN THE CONTEXT OF THE ASSUMPTIONS MADE IN CHOICES 2030, IT SHOULD BE SET AT 20% AT LEAST.HOWEVER, IN THE FOLLOWING SECTION WE HAVE USED A FIGURE OF 10%, ON THE BASIS THAT MORE REALISTIC DELIVERY ASSUMPTIONS FOR CONSTRAINED AND NEW BROWNFIELD SITES WILL BE USED.NEW LAND REQUIREMENTFollowing on from the above considerations, it is reasonably straight forward to calculate the number of new homes for which new land needs to be allocated in CityPlan Housing Need & Demand 2019 – 2032:17,174 unitsHousing Supply Target:17,174 unitsHousing Land Requirement (HST + 10%)23,892 unitsEffective Housing Supply:21,055 unitsNew Land Requirement:2,837 unitsCRITIQUE OF OPTIONS 1, 2 AND 3 IN CHOICES 2030OPTION 1Option 1 proposes to deliver 17,600 houses in the plan period on land within the urban area through rapid intervention by the Council and its public sector partners. If landowners do not bring forward the identified sites for development the Council proposes compulsory purchase.As explained in the Housing Land Study, 142 brownfield sites have been identified which are stated to have medium to high potential for housing. As we explain below there is not any evidence presented to indicate that this is in fact the case. Some of the sites may meet planning objectives e.g. proximity to public transport, but there is significant doubt regarding delivery.Although we fully recognise and support the priority to bring forward brownfield land for development, unfortunately Option 1 has a number of fundamental problems which should rule it completely out of contention.Firstly, the identified capacity of 17,600 is only about 33% of the number of additional new houses required to meet Edinburgh’s need and demand. Secondly, it is highly unlikely that the 142 identified sites will be developed in their entirety by 2032. The deliverability of these sites has not been considered in the Housing Study. Important basic information about the sites is apparently unknown including whether the owner is interested in selling / developing the site and who owns them. Just 6ha of land (capacity for 428 dwellings) is identified as suitable. A further 140ha is identified as being partially suitable for development (7,767 dwellings) and 127ha (8,406 dwellings) as unsuitable. Nevertheless, it has been assumed that all of these sites, whatever their classification will be delivered in full during the plan period, apparently disregarding the suitability review. Of the 275ha of land just 11ha is vacant. The delivery of the land therefore assumes that the operation of existing businesses or public sector organisations will cease. For this to be the case residential development would need to create a land value in excess of the value of the premises in its current use and provide sufficient incentive for the landowner to sell. This has not been considered in the Housing Study and should not necessarily be assumed for the following reasons:1.The change of use of industrial to residential will have a heavy cost burden, including significant developer contributions and often high abnormal land remediation costs. In many cases this

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may make residential development economically unviable.2. The City Plan Industrial Property Market finds that industrial site vacancy rates are low in Edinburgh and rents are growing. This picture is similar in South East Scotland with Ryden's 85th Scottish Property Review noting that vacancies are at record low levels (p. 20). Moving location will be difficult for many operators and so they may well place a particularly high value on sites for owner-occupiers or outstanding lease periods for tenants. This will mean that asking prices for those that may be willing to sell could also reflect valuations of the operating companies as going concerns. Many of these sites will have already been considered by private developers with the landowners approached. It is for the Council to explain how, despite having not come forward to date, they will be delivered for housing, despite the financial burdens of planning policy being increased, reducing the land value which could be offered by a prospective developer. The lead in times for many of the sites, even if they are in single ownership and can be viably developed, will be lengthy. Existing leases would need to expire or be bought out, which would add to viability challenges. However, for many sites, there will be multiple ownerships, where conflicting interests will add to the difficulties. Compulsory purchase is unlikely to be solution due the complexity, length, cost and uncertainty of the procedure. It is questionable whether CPO would be successful if seeking to acquire land occupied by active businesses with employees unless there were already other suitable premises in suitable locations available. One would also question the desire of the Council to even want to proceed in individual cases that involved forcing the closure of businesses and related loss of employment. The time taken to go through the process should also not be underestimated. It will presumably be necessary to give the owners a chance to bring the site forward for development themselves. This could be a period of five years, but many sites may well have current leases lasting longer than this. It would then be necessary to make efforts to obtain the sites on the open market. A CPO may be able to be ran alongside this but the process would still take many years. For instance for the St James Centre, approaches were first made to owners in 2008 and has only been completed 12 years later. The costs and logistics of running multiple contentious CPOs simultaneously will also likely be prohibitive. Moreover, much of this land is currently in employment use, and the Choices document says intervention will be required to deliver 275 hectares of employment land. There is virtually nothing in the Choices document to explain how this provision of employment land will transition without resulting in significant economic upheaval and related negative impacts for employment and service delivery.

Option 2 Option 2 proposes 27,900 homes on a number of large-scale greenfield sites around the City. Although we support the release of these sites, there are a number of flaws in this strategy. Firstly, the number of homes proposed is only just over half of the additional new homes required to meet housing need and demand in full. Secondly, it is unlikely that the number of houses proposed can be delivered on these sites by 2032. There are about eight or nine site ownership interests involved and a rough calculation would suggest that each of these might deliver in the region of 300 homes per year once started. Given the strategic nature of these sites and the lengthy planning and related consenting process it is realistic to assume that development is unlikely to begin until 2025 at the earliest. An optimistic assumption might be that each site will therefore deliver 300 houses/year for a 7-year period up to 2032, producing a total of approximately 16,800 houses, which is significantly below the ambition of 27,900. It is therefore clear that significant additional new sites are be required, simply to get closer to meeting full housing need and demand.

Option 3 Option 3 is described as the blended approach, focussing on greenfield and brownfield land. However, it too has fundamental shortcomings. Firstly, it only proposes 17,600 houses in total, the same as Option 1, which as explained above is only a fraction of what is required to meet Edinburgh's housing need and demand. Secondly, although it assumes 11,000 houses are built on the 142 urban brownfield sites identified rather than 17,600 in Option 1, in our view this continues to be a very significant over-estimate of what can be achieved for the reasons we have explained under Option 1. Also, the proposal for 6,600 houses on greenfield sites significantly under-utilises the delivery potential on sustainable sites around Edinburgh.

ALTERNATIVE OPTION 3 We agree that a 'blended approach' of greenfield and brownfield land release for housing is appropriate but it should seek to deliver significantly more homes than is likely to arise from Option 3. If Edinburgh's housing need and demand is to be met in full then that would mean that new land for 52,837 homes would need to be identified.

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However, we accept that it is not a realistic proposition that this number of houses (minus 10% generosity) could be delivered in the plan period in addition to the effective housing land supply. It is notable that the Choices document does not envisage that at least some of the very large proposed shortfalls in meeting Edinburgh's housing need and demand in full should be accommodated elsewhere in the City Region. This is the approach that has been the cornerstone of strategic planning for housing in the Region for many decades, and its abandonment now has significant consequences for the City. To simply ignore the unmet housing need and demand that would inevitably arise from any of the 3 Options proposed in the Choices document is not, in our view, a reasonable or acceptable approach. Nor does it comply with Scottish Planning Policy or Government aspirations for the delivery of housing to reflect need and demand. We therefore propose an Alternative Option 3. As described below, this is more realistic in regard to the delivery of housing on brownfield land, but continues to be aspirational to ensure that its potential is maximised. Greenfield land has much greater potential than identified in Option 3. In our view, a more reasonable and realistic assumption for delivery from new brownfield sites within the plan period is 6,000 homes. Even that will be a significant challenge given the issues we have noted above in respect to viability, lead-in times, CPO etc. Option 2 of the Choices document indicates that 27,900 units can be delivered on the greenfield sites identified. However, because of lead-in times for development and the limit to the rate of development on individual sites, it is inevitable that additional greenfield sites will need to be identified to achieve this total within the plan period.

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

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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:

Supporting Info

Email

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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Response Type Developer / Landowner

On behalf of: Taylor Wimpey

Choice 12 B8

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

Short Response Not Answered

Explanation

Choice 12 B9

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

Short Response Not Answered

Explanation

Choice 12 B10

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

Short Response Not Answered

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

Choice **12 C**

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

Short Response

Explanation

Choice **12 C**

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

Short Response

Explanation

Customer Ref: Response Ref:

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

Customer Ref: Response Ref:

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Response Type

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Supporting Info

Email

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 are broadly supportive of ‘an area of search’ which allows a wide consideration of future uses within West Edinburgh depending on the findings of the West Edinburgh Study and future decisions by the Scottish Government on uses within West Edinburgh. Whilst we would support this approach in principle, it is important to identify individual, sustainable sites in City Plan 2030 which can support a range of uses including housing. The Local Development Plan is responsible for identifying enough land to deliver the required number of homes to meet housing need and demand. The Land at Norton Park is one of the most sustainable and accessible sites in West Edinburgh. The City Mobility Plan which is currently being consulted upon shows that the site would also benefit from a potential new tram route or a bus rapid transit (BRT) link through the site.

Customer Ref: Response Ref:
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Response Type
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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 Taylor Wimpey welcomes the Council’s proposals to remove the safeguard in the existing plan for the Royal Highland Showground site to the south of the A8 at Norton Park and the site allocated for other uses. The Policy contained within the existing plan states that: “The site of the Royal Highland Centre may be required for airport uses in the long term to meet air passenger growth forecasts. Therefore, development which would prejudice the long-term expansion of Edinburgh Airport will not be supported, except where it is compatible with the current use of the site by the Royal Highland Centre, in the context of this policy.” Reference to the relocation of the Royal Highland Showground is also made in National Planning Framework 3 (NPF3). The current safeguard and reference in NPF3 sterilises the site for alternative uses and this needs to be removed in order for the other uses to come forward, such as residential development, to accommodate sustainable and inclusive urban growth. As we have made clear in our representations, we do not consider that the Council’s preferred option, to only allocate brownfield land, is deliverable and therefore there is a requirement for the LDP to allocate suitable greenfield sites for development in order to meet housing need and demand. The site at Norton is a greenfield site provides a key opportunity for a sustainable, connected mixed-use development that will help to meet the significant demands for new housing provision within Edinburgh. The City Plan 2030 Housing Study states that the site is considered suitable for development, however, any allocation would be on the condition of the removal of this constraint. It is therefore important that the safeguard is removed for the site to be allocated. We have made separate representations to the NPF4 early engagement consultation requesting that reference to the safeguard is removed. We would encourage the Council to enter dialogue with the Scottish Government as soon as possible given that a proposed City Plan 2030 and proposed NPF4 are due out at the same time.

Choice 14 C

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

Short Response

Explanation

Customer Ref: Response Ref:

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Email

Response Type

On behalf of:

Choice **15 A**

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

Short Response

Explanation

Choice **15 B**

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

Short Response

Explanation

Choice **15 C**

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 15 D

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

Short Response

Explanation

Choice 15 E

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

Short Response

Explanation

Choice 15 G

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

Short Response

Explanation

Customer Ref: Response Ref:

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Name

Email

Response Type

On behalf of:

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

Choice **16 A3**

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **16 A4**

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

Short Response

Explanation

Choice **16 A5**

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

Short Response

Explanation

Choice **16 A5**

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

Short Response

Explanation

Customer Ref: Response Ref:

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Name

Email

Response Type

On behalf of:

Choice **16 B**

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

Short Response

Explanation

Choice **16 C**

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

Short Response

Explanation

Choice **16 E1**

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 E2

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

Short Response

Explanation

Choice 16 E3

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

Short Response

Explanation

Choice 16 E4

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 E5

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

Short Response

Explanation

Choice 16 E6

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

Short Response

Explanation

Choice 16 E7

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 E8

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

Short Response

Explanation

Choice 16 EX

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

Short Response

Explanation

Choice 16 F

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

Short Response

Explanation

Customer Ref: Response Ref:

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Response Type

On behalf of:

Supporting Info

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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

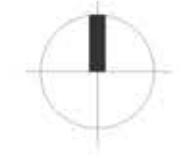
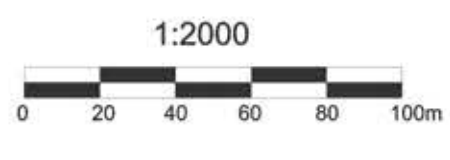


- 1. New Village Square – pedestrian priority square with dedicated space for community activities
- 2. New Linear Park – SUDs ponds, planted swales, footpaths/ cycleways, indigenous landscape, natural play areas.
- 3. The Boulevard – tree lined street giving access to residential areas, with planted swales and landscape
- 4. The Crescent – tree lined crescent giving access to residential areas, with planted swales and landscape
- 5. Woodland Pavilion and community woodland- promoting community involvement in the maintenance and management of the local environment
- 6. New principal access from B9080 formed as a roundabout to provide entry feature/gateway and to assist with speed control
- 7. New secondary access (simple priority junction) from B9080
- 8. Existing access footway extended from Queensferry Road into new neighbourhood, with potential for public transport access.
- 9. Potential new school campus location (primary and secondary schools)
- 10. New woodland tree belt along the northern boundary of the site to mitigate road and rail noise and increase biodiversity
- 11. Finished eastern edge to Kirkliston with development softened by tree planting, and with glimpsed views into open spaces along the town boundary
- 12. New woodland buffer adjacent to existing steadings
- 13. Residential hamlets designed along Homezone principles – shared surface streets, low traffic speeds and informal spaces for socialising
- 14. Neighbourhood squares/ courtyards – local focal point public spaces
- 15. Pedestrian and cycle connections to earlier phases of development
- 16. New SUDs ponds at junction of existing and proposed developments
- 17. Principal SUDs pond – new wetland habitat formed as gateway to new neighbourhood
- 18. Local Nature Conservation Site retained, protected and enhanced
- 19. New footway through Local Nature Conservation Site to link to village centre
- 20. New pedestrian/ cycle route to Queensferry Road
- 21. Renewable Energy Centre
- 22. Community allotments
- 23. Vehicular access from existing entrance from the B800
- 24. Potential pedestrian/ cycle linkage



Almondhill

•Kirkliston East•





- KEY**
- Site Boundary
 - Alternative tram route with additional halt
 - Primary routes with raised road junctions (Bus Rapid Transit route)
 - Secondary routes with raised road junctions (Bus Rapid Transit route)
 - Residential streets
 - Mixed-use urban core. To include shops/retail, food and drink, health facilities, commercial offices, homework units, communal working spaces and higher density residential
 - Higher density residential
 - Medium density residential
 - Lower density residential
 - Primary school with playing fields
 - Playing fields, community building and Neighbourhood Equipped Area of Play
 - Public open space with foot and cycle paths
 - Neighbourhood park with children's play area/Local Equipped Area of Play
 - Retained existing and proposed trees and hedgerow infrastructure plan
 - Attenuation basins
 - Potential Future HS Airport interchange safeguarded land
 - Creating active travel route
 - Committed improvements to active travel route

1. Safeguarded tram route as defined in the Edinburgh Local Development Plan.
2. Proposed alternative tram route passing through the site with additional tram halt to specifically serve this development.
3. Primary access points into the Site taken from new junctions on the A8 Glasgow Road and from the southern airport roundabout.
4. Secondary access point from Gogfistone Road.
5. Route crossing access road to Norton House Hotel for tram and Bus Rapid Transit only.
6. Scheduled Ancient Monument set within attractive public open space with interpretation sign.

QUANTUM OF DEVELOPMENT

Site Area:	83.64 ha
Residential developable area including new roads and footpaths and mixed-use Urban Core:	59.50 ha
Development Yield:	Up to 4,000
Development Density:	65 - 100 dph
Other Community Uses:	
• Primary School	1.50 ha
• Community Playing Fields	2.00 ha
Public open space area within and surrounding the development including attenuation features:	20.34ha
Safeguarded routes / Temporary public open space	1.30 ha

CLIENT:
Taylor Wimpey & Hallam Land

PROJECT:
Norton

DRAWING:
Vision Framework

PROJECT NUMBER:
TAYE3008

DRAWING NUMBER: 01 **CHECKED BY:** RM

REVISION: 00 **STATUS:** Final

DATE: April 2020 **SCALE:** 1:2,500 @ A0