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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

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

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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

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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 Edinburgh 205 will deliver an appropriate level of density consistent with the objective of making the best use of the limited space in the city and to ensure that sites are not under-developed. As an existing site within the defined 'urban area' (see the approved LDP proposals map) and with ready access to public transport services, this is particularly relevant. Edinburgh 205 therefore presents an opportunity to consider higher density development, albeit this will also need to take account of proximity to Edinburgh airport.

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 Edinburgh 205 will create places, streets and road layouts that reflect the council's Street Design Guidance and the six qualities of successful places in Scottish Planning Policy as described in section 2 of their representation document.

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 Edinburgh 205 will deliver quality open space and public realm that will be capable of being used for a range of activities.

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Choice **3 A**

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

Short Response

Explanation NIL is committed to delivering a masterplan for Edinburgh 205 within which the principle of carbon reduction is embedded. To that end, they will continue to appraise the opportunities presented by low and zero-carbon generating technologies to help deliver the council's target to be carbon neutral by 2030.

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 Section 2 of NIL's representation document together with appendix 1 (of this document) demonstrates the extent of masterplanning carried out by NIL and the related policy framework which is already in place to guide future development at the subject site. This is very much aligned with the objectives of Choice 4 and will be a key part of the development management stages that follow. NIL has also carried out extensive consultation with the local community and stakeholders in relation to previous proposals for the site (which are the subject of an extant Proposal of Application Notice reference 15/00225/PAN) and again, this will continue to be at the heart of their development management strategy when these refreshed proposals come forward.

Customer Ref: 01733 Response Ref: ANON-KU2U-GWWF-2

Name Rob Newton

Response Type Agent / Consultant

On behalf of: New Ingliston Ltd

Supporting Info Yes

Email robert.newton@avisonyoung.com

Choice 4 B

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

Short Response Not Answered

Explanation

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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 NIL supports the principle of ensuring that new development is appropriately supported by necessary infrastructure. As set out in the MIR, this can be achieved by directing development to locations where there is existing infrastructure or where it can be accommodated. Transport Infrastructure: Pursuant to this objective and as described in section 2 of the representation document, Edinburgh 205 is a unique proposition in that significant transport infrastructure is already in place both within the site itself and at nearby locations, such as Edinburgh Gateway Station. This elevates its status in our opinion to being a genuine 'infrastructure-ready' site capable of receiving development. In terms of the MIR objectives, it demonstrates the sites credentials for reducing carbon emissions, promoting equity, supporting healthier lifestyles and delivering sustainable economic growth. It also demonstrates alignment with the council's aspirations as described in its draft City Mobility Plan. In relation to other transport infrastructure, NIL supports the principle of a strategic transport corridor towards Newbridge and IBG (corridor 7) and how the development of transit-led solutions (including Bus Rapid Transit and Tram) would support existing major development locally as well as supporting regional level commuting. Education Infrastructure: We note the findings of the Housing Study into new school infrastructure which is likely to be required to support the housing need identified for City Plan, and that a full education infrastructure appraisal and strategy will support the plan in due course. This infrastructure is laid out in the MIR according to the three options for delivering new housing at Choice 12 and NIL welcomes the reference to IBG under 'Greenfield Sites' (Choice 12 – Option B) as this is recognition of the new housing contribution which it could make. Consistent with this, NIL has already taken the step of reserving a portion of the site (see page 16, appendix 1 of the representation document) as a potential receiving site for education infrastructure and would welcome dialogue with the council in due course. To this end, the site has the potential to make a significant contribution to delivering the council's education infrastructure needs and requirements in this part of the city. On a point of detail, we believe that reference to IBG (i.e. Edinburgh 205) would be more appropriately found under the heading of 'Urban Area Sites' and we explain our reasoning for this in response to Choice 12 further on. Indeed, under the sub-heading of 'West Edinburgh' reference is already made to the requirement for a new primary school to accommodate significant pupil growth from any new housing development around the airport. In our submission, this should include Edinburgh 205. Finally, we understand that the council is reviewing its approach to developer contribution matters in response to a Direction from Scottish Ministers earlier this year not to adopt the finalised version of its proposed Supplementary Guidance. Outwith this MIR process, NIL may therefore wish to make separate representations to any revised guidance that emerges. In summary, NIL and their advisers look forward to working with the Council to ensure that any infrastructure that is required to support the delivery of the Edinburgh 205 proposals is appropriately captured within City Plan 2030 and its associated Action Programme in due course.

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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 Please refer to the representation document. Copied below

NIL supports the principle of ensuring that new development is appropriately supported by necessary infrastructure. As set out in the MIR, this can be achieved by directing development to locations where there is existing infrastructure or where it can be accommodated.

Transport Infrastructure

3.11 Pursuant to this objective and as described in section 2, Edinburgh 205 is a unique proposition in that significant transport infrastructure is already in place both within the site itself and at nearby locations, such as Edinburgh Gateway Station. This elevates its status in our opinion to being a genuine 'infrastructure-ready' site capable of receiving development. In terms of the MIR objectives, it demonstrates the sites credentials for reducing carbon emissions, promoting equity, supporting healthier lifestyles and delivering sustainable economic growth. It also demonstrates alignment with the council's aspirations as described in its draft City Mobility Plan.

3.12 In relation to other transport infrastructure, NIL supports the principle of a strategic transport corridor towards Newbridge and IBG (corridor 7) and how the development of transit-led solutions (including Bus Rapid Transit and Tram) would support existing major development locally as well as supporting regional level commuting.

Education Infrastructure

3.13 We note the findings of the Housing Study into new school infrastructure which is likely to be required to support the housing need identified for City Plan, and that a full education infrastructure appraisal and strategy will support the plan in due course.

3.14 This infrastructure is laid out in the MIR according to the three options for delivering new housing at Choice 12 and NIL welcomes the reference to IBG under 'Greenfield Sites' (Choice 12 – Option B) as this is recognition of the new housing contribution which it could make. Consistent with this, NIL has already taken the step of reserving a portion of the site (see page 16, appendix 1) as a potential receiving site for education infrastructure and would welcome dialogue with the council in due course. To this end, the site has the potential to make a significant contribution to delivering the council's education infrastructure needs and

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requirements in this part of the city.

On a point of detail, we believe that reference to IBG (i.e. Edinburgh 205) would be more appropriately found under the heading of 'Urban Area Sites' and we explain our reasoning for this in response to Choice 12 further on. Indeed, under the sub-heading of 'West Edinburgh' reference is already made to the requirement for a new primary school to accommodate significant pupil growth from any new housing development around the airport. In our submission, this should include Edinburgh 205.

3.16 Finally, we understand that the council is reviewing its approach to developer contribution matters in response to a Direction from Scottish Ministers earlier this year not to adopt the finalised version of its proposed Supplementary Guidance. Outwith this MIR process, NIL may therefore wish to make separate representations to any revised guidance that emerges.

3.17 In summary, NIL and their advisers look forward to working with the Council to ensure that any infrastructure that is required to support the delivery of the Edinburgh 205 proposals is appropriately captured within City Plan 2030 and its associated Action Programme in due course.

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

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Choice 5 D1

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

Short Response

Explanation

Choice 5 D2

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

Short Response

Explanation

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

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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 NIL supports the objective of creating places that focus on people not cars and which prioritise public transport, walking and cycling to encourage active and healthy lives. To achieve this, the MIR states that all development must be well served by existing or planned new public transport, walking and cycling infrastructure. As described in section 2 of the representation document and set out within the masterplan document at appendix 1 (see page 11 in particular), these characteristics are already embedded within the site and as such, the proposals are very much aligned with the proposed changes being sought by the council.

Choice **6 B**

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

Short Response

Explanation

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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 NIL supports the objective of reducing car use. As with Choice 6, the site can already boast the necessary credentials required to achieve this objective, such as excellent public transport provision. Furthermore, the masterplan proposals will create an environment that prioritises walking and cycling over car use, as well as providing infrastructure that supports electric vehicle charging. As such, the proposals are very much aligned with the proposed changes being sought by the council. We also note reference at proposed change D to the potential to safeguard an extension to the park and ride at Ingliston as part of the IBG masterplan. This will obviously be a decision for the council in the first instance, albeit NIL supports the principle of this change.

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 We note reference at proposed change D to the potential to safeguard an extension to the park and ride at Ingliston as part of the IBG masterplan. This will obviously be a decision for the council in the first instance, albeit NIL supports the principle of this change.

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 NIL supports the objective of delivering strategic walking and cycling routes as part of the aim of Edinburgh being a green, connected city. As with Choices 6 and 7, the masterplan proposals for the site will create an environment that prioritises walking and cycling over car use; please refer to appendix 1 of the representation document in this regard. As such, the proposals are very much aligned with the proposed changes being sought by the council.

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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 NIL supports the objective of delivering strategic walking and cycling routes as part of the aim of Edinburgh being a green, connected city. As with Choices 6 and 7, the masterplan proposals for the site will create an environment that prioritises walking and cycling over car use; please refer to appendix 1 of the representation document in this regard. As such, the proposals by NIL at Edinburgh 205 are very much aligned with the proposed changes being sought by the council.

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Choice 8 C

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

Short Response

Explanation

Choice 9 A

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

Short Response

Explanation

Choice 9 B

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

Short Response

Explanation

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Choice **10 A**

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

Short Response

Explanation

Choice **10 B**

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

Short Response

Explanation

Choice **10 C**

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

Short Response

Explanation

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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 NIL supports the proposed increase to the provision of affordable housing from 25% to 35% and this has been allowed for, on-site, in the proposals at Edinburgh 205. This could potentially yield an affordable housing provision of 840 homes and would represent, alone, in excess of 4% of the council's target in the next 10 years.

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 NIL also supports the aspirations set out in proposed change B that such provision should deliver a mix of housing types and tenures, including a percentage for family housing and for the Private Rented Sector (or Build to Rent, as it is otherwise known). Again, these provisions have already been allowed for in the emerging proposals at Edinburgh 205.

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Name: Rob Newton
Response Type: Agent / Consultant
On behalf of: New Ingliston Ltd

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

Choice 12 A

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

Short Response: Option 3 (Blended)

Explanation

Choice 12 A. How many new homes does Edinburgh need? We note the terms of the assessment carried out to determine Edinburgh's housing needs and that this uses the supply targets set out in Strategic Development Plan 1 ('SDP1'). In our submission, this is a flawed approach. There should be no reliance on SDP1 for setting Housing Supply Targets, as SDP1 is now more than 5 years old and is therefore out-of-date (see Scottish Planning Policy paragraph 33).

The MIR's reliance (to some extent) on SDP1 is therefore likely to mean that Edinburgh's Housing Target to 2032, as proposed, will be significantly short of where it should be. This casts serious doubt over the housing land supply options that follow, and with it, the requirement to ensure that sufficient land is being allocated to provide a 5-year effective supply (as required by SPP). In our submission, this lends further support to the scale of housing proposed at Edinburgh 205. Returning to the council's assessment, HNDA2 is the most up-to-date robust and credible assessment of housing needs and demand. Given that SDP1 is out of date, we agree that HNDA2 should therefore be afforded an appropriate level of consideration in the preparation of City Plan 2030.

Choice 12 B. Who will deliver these homes? Choice 12 C. Where will we deliver the homes in the most sustainable way? Whilst laudable, the council's proposed change that it, and its partners, would deliver all new homes solely within the urban area is unrealistic, in our opinion. This is further emphasised by our comments on the amount of new homes that Edinburgh actually needs, as explained above. In our submission, it is inevitable that 'Option 3 – A blended approach' of urban area and greenfield land will be a more realistic proposition in this regard. Whichever option ultimately comes forward, there can be no doubt, in our opinion, that Edinburgh 205 fulfils all of the required credentials for delivering new homes in the most sustainable way, being the key question posed in the MIR. In summary:

- Edinburgh 205 is, by definition, an 'Urban Area' site. This can be gleaned by reference to the approved Edinburgh LDP proposals map and various maps within the MIR (such as 'Map 1 – A connected, green Edinburgh'). Residential development at Edinburgh 205 would therefore be entirely consistent with the council's preferred approach (as set out in proposed change A) of building new communities at locations which reduce the need to travel, are supported by active and public transport, and would therefore help to meet climate change commitments. On a related point, whilst NIL welcomes the identification of Edinburgh 205 (referred to as IBG) as a 'potential greenfield allocation' by the council under options 2 and 3 of the MIR insofar as this clearly reinforces its credentials for more housing, such a reference is misleading in our opinion. The site is not 'greenfield' for the reasons set out above and immediately below. Distinct from the assessment of greenfield sites (in the council's Housing Study – January 2020), Edinburgh 205 has already been assessed as a suitable location for housing as evidenced by the current adopted LDP.
- The site is located within a Strategic Development Area, namely West Edinburgh.
- The site is already allocated as a new housing proposal in the approved LDP, as noted above.
- The site is uniquely 'infrastructure-ready' to receive development and has excellent public transport provision already in place (the tram) or very nearby (bus and rail).

- The masterplan allows for a rich mix of uses on site, including a significant element of business use together with ancillary commercial uses, all of which would be easily accessible by foot or bicycle and well within the prescribed walk-time distances set out in the council's Housing Study. The site supports

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Name: Rob Newton
Response Type: Agent / Consultant
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active travel overall. The masterplan proposals have been guided by the sustainability principles identified in paragraph 29 of SPP, and in our view adhere to these principles. NIL supports the proposed increase to the provision of affordable housing from 25% to 35% and this has been allowed for, on-site, in the proposals. This could potentially yield an affordable housing provision of 840 homes and would provide a mix of housing types and tenures to serve varying needs. A generous part of the site has been set aside as a potential receiving site for helping to deliver community infrastructure, in the form of new school provision. We wish to raise two specific points of clarification in relation to the development credentials of this site for new housing. Firstly, we note that the 'urban area site assessment' in the council's Housing Study excluded sites protected by an existing employment designation (part 2a, page 1) and we assume this was the reason for this sites exclusion from the assessment. As highlighted above, Edinburgh 205 scores particularly highly against the housing site assessment criteria and in our submission, it should have formed part of the urban area sites identified in the Housing Study. On this basis, we have already set out a case in section 2 of the representation document that site specific policy should evolve from its current position to reflect a more mixed use allocation at the site. The second point relates to flood risk matters where Map 15 on page 44 of the Choices document appears to incorrectly show the 'area of importance of flood management', specifically relating to the Gogar Burn and to the land to the south of Edinburgh Airport.

These areas for importance for flood management from Map 15 have been superimposed on the image below and outlined in black, and vary very considerably from the SEPA flood mapping in blue. The areas are shown in black on the image below and are taken from: Choices document page 39, Map 11 - Area 2 West Edinburgh Edinburgh Local Development Plan Proposals Map November 2016 The definition of an "area of importance for flood management" is not clear from review of the supporting documents to the Choices document, namely: The Environmental Report at page 10 shows the current SEPA flood mapping, and cross refers to two other documents, which are: SEPA Flood Risk Management Strategy 2016, that refers to direct flood defences and sediment management on the Gogar Burn, with no further studies carried out to date City Council Local Flood Risk Management Plan 2016, that refers to Edinburgh Airport responsibilities for the Gogar Burn but notes no current plans for works or activities City Council Integrated Catchment Study 2018 which does not appear to have been published None of these supporting studies or documents suggests that the area of importance to flood management should be larger than the SEPA flood mapping that shows the functional flood plain, which at this location was also subject of an approved flood risk assessment (submitted with planning application reference 15/05580/PPP) and allocated in the adopted Local Development Plan. These are shown in blue on the image above. It is confirmed that any new development will be subject to Sustainable Urban Drainage Systems (SUDS) that maintain the current run off characteristics of the catchment, in line with current policy. It is therefore possible that the mapping in the Choices document is indicative only, rather than an accurate representation of the designation described. Whatever the reason for this, it is clear from the evidence noted above that any development allocation of the site in the City Plan 2030 Proposed Plan should therefore confirm that no additional burden shall be placed on the area of land designated an "area of importance for flood management" than is greater than the current SEPA flood mapping. Adopting the urban area site assessment methodology used by the council, we have therefore summarised our own case in the representation document (at paragraph 3.37) based on the many credentials set out above. On the matter of community infrastructure, we believe that a 'partially' suitable classification is justified in that school capacity matters could be mitigated through appropriate intervention. In our submission, this clearly demonstrates overall that the site is suitable for housing-led mixed use development and accordingly is worthy of an appropriate site allocation in the LDP. Notwithstanding our statements above in relation to 'greenfield' sites, we welcome the early identification of guiding development principles which could be applied to housing development sites in West Edinburgh (page 42 of the MIR). These could equally apply to Edinburgh 205 as an 'urban area' site. Indeed, it is worth noting that a number of these principles, such as landscape mitigation, transport infrastructure, education infrastructure and density, are already embedded within the masterplan

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proposals (see appendix 1 of the representation document). Assuming this approach carries forward to the Proposed Plan stage, we would welcome further dialogue with the council to agree site specific development principles (as well as those relating more generally to development in West Edinburgh) to help inform more detailed proposals as part of a mixed use allocation at the site and the planning application stages that would follow.

Choice **12 B1**

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

Short Response

Explanation

Choice **12 B2**

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

Short Response

Explanation

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Choice **12 B3**

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

Short Response

Explanation

Choice **12 B4**

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

Short Response

Explanation

Choice **12 B5**

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

Short Response

Explanation

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Choice **12 B6**

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

Short Response

Explanation

Choice **12 B7**

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

Short Response

Explanation

Choice **12 B8**

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

Short Response

Explanation

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Choice **12 B9**

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

Short Response

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

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

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Choice 12 C

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

Short Response

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

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Choice **12 D**

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

Short Response

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 NIL supports the aspirations to support inclusive growth, innovation, universities and culture, and believes that the masterplan proposals presented within these representations demonstrate how Edinburgh 205 could help to achieve these aims. Indeed, it is encouraging to note that West Edinburgh is already noted in the 'proposed change' for the contribution that it could make to these aims. The masterplan proposals are entirely aligned with the overarching objective of seeking good growth for Edinburgh. The business space proposed has the potential to cater for a wide variety of needs, including those referred to within the 'proposed change' and we would welcome further dialogue with the council on these matters to ensure that sufficient flexibility is built-into the masterplan to allow for evolution of requirements within these sectors. The related outcomes of the Commercial Needs Studies are also noted in this regard and NIL will continue to be advised on these matters by their retained business space agents.

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

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 NIL supports the principle of a dedicated ‘Choice’ on ‘delivering West Edinburgh’ and would strongly endorse that such an approach is carried forward into the Proposed Plan for all the reasons set out in the introduction to this choice. NIL is aware of the emerging West Edinburgh Spatial Study and look forward to making further contributions to its preparation, as a key stakeholder. Edinburgh 205 can play a key role in delivering the full potential of the area, in this regard. NIL supports the general intent behind ‘Proposed Change A’, insofar as site allocations in City Plan 2030 should 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. To this end, Edinburgh 205 is a prime candidate site for inclusion in the Proposed Plan as a mixed use allocation. Focussing on the matter of ‘delivery’, Edinburgh 205 offers many advantages, notably around the key issue of infrastructure. Earlier parts of NIL's representation document (in particular paragraph 2.29) and the masterplan proposals (at appendix 1) describe these many advantages. In short, it already benefits from excellent sustainable transport accessibility and is uniquely ‘infrastructure-ready’ to start receiving development. The site can appropriately be considered as an ‘effective’ development opportunity in this regard.

Choice **14 B**

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

Short Response

Explanation

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

Supporting Info

Email

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

Customer Ref: 01733 Response Ref: ANON-KU2U-GWWF-2
Name: Rob Newton
Response Type: Agent / Consultant
On behalf of: New Ingliston Ltd

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

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: Not Answered

Explanation: Not Answered

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

Supporting Info
Email

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 As set out in the introduction to Choice 16, the nature and scale of business use proposed at Edinburgh 205 would help to ensure that City Plan 2030 can deliver enough floorspace to meet the City's demands. Based on the key findings of the Edinburgh City Plan 2030 Commercial Needs Study: Office Market (November 2018), we believe that 92,900 sqm (1 M sqft) of business use proposed at Edinburgh 205 is more than sufficient to cater for demands for the following key reasons:

- Edinburgh's existing office stock is 1.85 M sqm (19.9 M sqft) and of this, 20% is already located in West Edinburgh.
- The majority of market demand is directed toward the city centre.
- Edinburgh's projected office need for the period 2019-2030 was forecast as being between 17,000 sqm (low requirement) to 30,000 sqm (high requirement) (net) per annum.
- Two locational options were considered, being balanced growth where 70% of development is in the city centre to match proven demand and 30% elsewhere, and decentralised growth where 50% is in the city centre and 50% elsewhere.
- The most likely scenario based on current trends is for high, balanced growth, meaning a requirement of 106,650 sqm (c1.15 M sqft) in other locations (i.e. outwith the city centre) in the period 2019 to 2030.
- Based on the most likely scenario for other locations, Edinburgh 205 alone would therefore provide 87% of this requirement. In conjunction with the office content of IBG phase 1, Edinburgh 205 creates supply for 2.3M sqft in West Edinburgh, twice the need identified in the Commercial Needs Study.
- In addition, there is already a pipeline of 538,000 sqm (5.79 M sqft) of office development with planning permission across the city (excluding projects under construction). 60% of this pipeline is already located in West Edinburgh, with 37% at Edinburgh Park. A further 153,000 sqm of office development proposals were awaiting determination at December 2017 and of this, 80% was in West Edinburgh, notably phase 1 of the IBG (being 122,158 sqm).
- The current available supply of office space should also be taken into consideration. This amounted to 207,663 sqm in Q3 2018. Of this, West Edinburgh had the highest vacancy rate of anywhere in the city at 14%, accounting for 24% of the total stock.
- Against the above context of a vast supply, West Edinburgh has accounted for only 16% of office take-up since 2012.
- Looking at the viability of office development, rents vary significantly by sub-market area. They have declined by 2% over the last 5 years in West Edinburgh. Only the city centre prime rents are sufficient to support new-build development. The other areas' rents would not meet development costs. In simple terms, for business use and associated infrastructure to become a viable proposition at Edinburgh 205, it must therefore be supported by a significant residential component, as proposed.
- Reflecting on the above points, the scale of business use proposed at Edinburgh 205 is clearly more than sufficient to ensure that office needs can be met, up to, and well beyond, 2030.

Other points from the Commercial Needs Study which are worth noting include:

- One of the office market priorities for City Plan 2030 is to capture the potential of off-centre office locations through transport investment and diversification to include a full range of land uses. This lends further support to the Edinburgh 205 masterplan proposals in diversifying away from business-led to embrace a fuller and more balanced range of land uses.
- As evidenced in our response to Choice 13, a flexible approach to the provision of business space is proposed within the masterplan to ensure this supports changing requirements in key sectors and allows for the realisation of new opportunities as they come forward. In light of the above considerations, it will be important to monitor business space market demand and supply characteristics, and therefore the viability of such

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space relative to the land use and placemaking objectives for Edinburgh 205 as set out within these representations. Reflecting on all of the above, whilst NIL continue to support the principle of a strategic office location at Edinburgh 205, this should be in the context of an allocation for mixed uses that now includes a much greater proportion of residential uses. Section 2 of NIL's representation document sets out a detailed justification for this approach and the manner in which site specific policy should evolve in the LDP Proposed Plan to reflect this position.

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

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Name
Response Type
On behalf of:

Supporting Info

Email

Choice 16 B

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

Short Response

Explanation

Choice 16 C

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

Short Response

Explanation

Choice 16 E1

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

Short Response

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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:
Name
Response Type
On behalf of:

Supporting Info

Email

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

Representations to 'Choices for City Plan 2030'
On behalf of New Ingliston Ltd and in respect of
'Edinburgh 205: A connected, Mixed-Use,
Sustainable Extension to the City'

April 2020



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Appendices

Appendix I Edinburgh 205 Masterplan Document by 7N Architects

Prepared By: Rob Newton

Status: Final

Date: April 2020

Executive Summary

New Inghliston Ltd welcomes the opportunity to present these revised proposals for the Edinburgh 205 masterplan in support of representations to the 'Choices for City Plan 2030' process. They present a unique opportunity for a connected, mixed-use, sustainable extension to the city in West Edinburgh and present a compelling case for inclusion in the new LDP Proposed Plan later this year. This document should be read in conjunction with the 7N masterplan for Edinburgh 205 dated April 2020 and included in Appendix 1 of this document.

The Edinburgh 205 masterplan proposals would :

- Deliver a major, high quality mixed use development in an area of West Edinburgh where new, high capacity public transport infrastructure is already in place.
- Provide 840 affordable homes (being 35% of the total in accordance with the City Council's proposed new standard) as part of a mixed use development providing over 2,400 new residential units .
- Provide a minimum of 92,900 sqm (1 M sqft) of business space, which combined with the business space in IBG phase 1, would give a total of 2.3M sqft overall. This is the equivalent to twice the 1.15M sqft supply identified in the Council's Commercial Needs Study as being necessary for locations outwith the city centre up to 2030.
- Provide between 300-400 hotel rooms and at a location supported within the Council's Commercial Needs Study.
- Deliver complementary commercial uses and facilities including retail, food & beverage, leisure and community uses.
- Reserve sufficient land as a receiving site for delivering new education infrastructure as identified in the MIR 'Choices' for this part of the city. This could be in the form of a Primary or Secondary School.
- Provide new extensive parkland and recreation space.
- Provide a new walking and cycling network, connecting Edinburgh 205 to the surrounding areas and the City Centre.

The development plan context for these representations is already well-established with the release of the site from the green belt and its allocation for business-led mixed use development (the 'International Business Gateway') enshrined in the current LDP. Phase 1 of the IBG, to the immediate west of Edinburgh 205, already benefits from a Council resolution to grant planning permission. The principle of developing the site for a range of land uses, including housing, is therefore beyond doubt.

The development context itself has also evolved significantly, with the site already benefiting from excellent sustainable transport accessibility in the form of its own tram stop, as well as nearby rail and bus. To this end, it is uniquely 'infrastructure-ready' to start receiving development.

The emerging wider context is equally conducive to making these representations. West Edinburgh continues to be at the forefront of development planning for the city. It is afforded its own 'Choice' in the MIR and is already nationally significant in transport and economic development terms. Backed by the Edinburgh and South East Scotland City Region Deal, which will focus on maximising the benefits of existing infrastructure, the council and its partners have commissioned a study to look at the full potential of the area. In our submission, there is no other site in West Edinburgh that embodies this potential better than Edinburgh 205.

Against this context, we believe there is a compelling case for site specific policy to evolve in a way that delivers an accessible, integrated, mixed use place of the highest quality.

The increased emphasis on successful placemaking, combined with housing needs and demands across the city, supports a much greater component of residential use than originally envisaged at Edinburgh 205. It is also recognition that we have long since moved away from the traditional mono-use, urban edge, business park model and are focussing more on creating places with a rich mix of uses that will attract residents and businesses alike.

Furthermore, other emerging proposals nearby support this approach, including Parabola's proposals at Edinburgh Park and Crosswinds at Edinburgh Airport (being a preferred option in the MIR), both of which include a significant element of housing as part of mixed use proposals. Crosswinds is particularly relevant as it shares the same national development designation in NPF3 as the Edinburgh 205 site.

A study of commercial office needs across the city to inform the new LDP process shows a pipeline of new business use in West Edinburgh alone (comprising development with planning permission, awaiting determination or proposed) of 537,800 sqm. This will cater for forecast needs well beyond the LDP 2030 timeframe.

The range of sustainable transport options (tram, bus and rail) will make it possible to achieve very high levels of mode share to sustainable transport modes. Critically, this will reduce the negative impacts of unnecessary car use both for people living and working at the site. Furthermore, this will build on high levels of internalised trips promoted through the careful balancing of people living and working at the site and excellent pedestrian and cycle connectivity adopting international best practice.

Finally, from a delivery perspective, it is important to note that Edinburgh 205 is free of any major constraints and is therefore in a prime position to deliver much needed new development in this part of the city. In summary:

- Edinburgh 205 is an effective deliverable site in single ownership.
- All forms of public transport are already in place.
- The site is surrounded by the necessary existing infrastructure.
- There are no abnormal site conditions which would hinder the delivery of development.
- The first phase of Edinburgh 205 could be started in 2023 and is likely to be logically concentrated around the existing tram stop.
- This area of land is very attractive to the market, enabling rapid placemaking and delivery after commencement.
- Strong public transport and cycle links to the rest of the city already exist.

In light of these strong credentials, Edinburgh 205 offers a unique opportunity to be an exemplar development which can make a significant contribution to delivering key objectives of the emerging City Plan. In doing so, by 2030, these proposals will markedly help Edinburgh become:

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

1. Introduction

Context for these representations

- 1.1 These representations to the Main Issues Report ('MIR') stage of the plan preparation process, namely 'Choices for City Plan 2030', have been prepared by Avison Young on behalf of New Ingliston Ltd ('NIL'). They relate specifically to land in their control as identified by the plan below and is referred to as 'Edinburgh 205' throughout this document. For information, NIL has jointly made representations with other landowners in respect of land immediately to the west of the site below, being phase 1 of the IBG. This is the subject of a separate submission.



- 1.2 NIL presents this proposal for a sustainable mixed use quarter at Edinburgh 205 with an invitation to the City of Edinburgh Council ('the council') to recognise this already allocated urban extension site as a comprehensive proposal in the Proposed Plan stage that follows.
- 1.3 The proposals are described in greater detail at sections 2 of this document and help give effect to representations to the various 'Choices' that follow in section 3. These sections cover the outline case for development and its benefits in terms of access, place-making and policy. They demonstrate how the emerging proposals are very much aligned with the council's preferred choices in the MIR.
- 1.4 The development plan context for these representations is well-established, as is the emerging development context. Since 2000, NIL has participated widely in various West Edinburgh related development planning initiatives and forums. This has included significant stakeholder presence in the likes of the Edinburgh

International Development Partnership Board (EIDPB) and the emerging West Edinburgh Strategy for Inclusive Growth, as well as an Architecture & Design Scotland ('ADS') Panel Review process for this particular site.

1.5 The result of these various collaborative partnerships has already secured the release of this site from the green belt and its allocation for business-led mixed use development. Significant infrastructure has now been delivered pursuant to this, both on site and in the surrounding area such as the tram and Edinburgh Gateway Station.

1.6 Capitalising on this unique opportunity, the emerging proposals described in these representations can make a significant contribution to Edinburgh becoming the place it wants to be by 2030, by:

- promoting a highly sustainable city extension at Edinburgh 205 and where you don't need a car to move around;
- promoting a masterplan approach to built development, movement and spaces throughout the site in a way that supports physical and mental wellbeing;
- addressing an identified need for genuine mixed use development in the west of the City in a way that supports inclusive growth and innovation, as well as delivering a significant number of new affordable homes;
- maximising the benefits of significant public transport infrastructure already in-place; and
- focussing on good place-making.

Structure and scope of representations

1.7 The next section of this document describes the various aspects of the proposals and its overall credentials as a strong candidate for a mixed use site allocation at the LPD Proposed Plan stage. We hope this is useful context before responding directly to the various Choices in the MIR. In doing so, this report comprises the following sections:

- Section 2: The Edinburgh 205 site credentials and emerging proposals;
- Section 3: Representations to various Choices;
- Section 4: Summary and Conclusions.

2. Edinburgh 205: The opportunity

Context

- 2.1 West Edinburgh continues to be at the forefront of development planning for the city. It is afforded its own Choice in the MIR, 'Delivering West Edinburgh', and is already nationally significant in transport and economic development terms. As described in the MIR, *'The Edinburgh and South East Scotland City Region Deal seeks to maximise the use of existing infrastructure in West Edinburgh and has a £36m investment profile for the area. The Council, with partners including the Scottish Government, has commissioned a study of wider West Edinburgh to look at the full potential of the area'*.
- 2.2 The site itself forms part of a wider development aspiration known as the International Business Gateway ('the IBG'). The IBG is a well-established land use development allocation that has been incorporated into national and development plan policy. The principle of developing the site for a range of land uses, including housing, is beyond doubt. It is located in a highly sustainable location within the West Edinburgh Strategic Development Area and already benefits from excellent sustainable transport accessibility. To this end, it is uniquely 'infrastructure-ready' to start receiving development.
- 2.3 The council resolved to grant planning permission in principle ('PPP') for phase 1 of the IBG in August 2019. This application was subsequently recovered by Scottish Ministers for their own determination, following referral. A hearing took place in February 2020 and we now await the Reporter to complete his report and recommendations to Ministers in due course.
- 2.4 For future phases of development, all the land within Edinburgh 205 (73 hectares), to the immediate east of the IBG phase 1, is already in single ownership. This is the land described within this document as 'Edinburgh 205' and which presents a key opportunity for genuine mixed use development in a manner that wholly supports the emerging City Plan 2030 objectives. This is explained in greater detail further on.
- 2.5 Against this context and aspirations, NIL believes there is an opportunity for site specific development plan policy to evolve in a way that ensures the delivery of an accessible, integrated, mixed use place of the highest quality. These representations therefore offer the basis for establishing a long term policy framework for development and placemaking in the years to come.

Summary proposals and development content

- 2.6 All urban extension masterplans require long term flexibility and market demand. The take-up of occupied space will determine the final detail of the development. NIL constantly monitors demand from international, national, regional and indigenous local interests. Reflecting on this, NIL has worked-up various land use and associated density options for the site. From this, it is clear that, at efficient urban densities (as encouraged within the MIR) the site can yield a significant long term pipeline of development capacity for a mix of uses.
- 2.7 An appraisal of commercial needs strongly suggests the IBG phase 1 proposals are more than sufficient to fulfil development plan and national policy expectations as it relates to business uses and economic development. Notwithstanding this, business use will continue to form a key part of the land use mix at

Edinburgh 205 consistent with the prevailing policy context. These proposals therefore include a further 92,900 sqm (1 M sqft) of business use, albeit as part of a genuine mixed use development. This will result in 215,000 sqm (2.31 M sqft) of business use being provided across the entire IBG allocation as currently defined in the Edinburgh LDP.

2.8 The increasing emphasis on successful placemaking combined with housing needs and demands across the city, supports a much greater component of residential use than originally envisaged. It is also recognition that we have long since moved away from the mono-use, urban edge, business park model. In our submission, this refreshed approach will help to create higher quality places that better reflect the six qualities of 'successful place' as envisaged within Scottish Planning Policy. To this end, the proposed development strategy is integrated with the placemaking strategy, meaning an attractive, active, place with a rich mix of uses will attract residents and businesses alike to locate here. This is further described within the masterplan document prepared by 7N Architects attached at appendix 1.

2.9 Furthermore, it is worth noting that other emerging proposals nearby further support this approach. Parabola's proposals at Edinburgh Park and Crosswinds at Edinburgh Airport (being a preferred option in the MIR) both include a significant element of housing as part of mixed use proposals. Crosswinds is particularly relevant as the proposed application site (reference 19/05303/PAN) shows that it is wholly located within the area identified as a national development for 'Strategic Airport Enhancements' in NPF3. This must suggest the council is satisfied that the proposed mix of uses at Crosswinds (in particular the housing component), is entirely consistent with the provisions of NPF3.

2.10 The indicative Edinburgh 205 masterplan therefore demonstrates the potential to deliver:

- At least 2,400 residential units across a range of housing types including townhouses and apartments, with a component of the latter being for Build to Rent. 840 of these units will comprise on-site affordable provision i.e. 35%.
- A minimum of 92,900 sqm (1 M sqft) of business space.
- Between 300-400 hotel rooms.
- Complementary commercial uses and facilities including retail, food & beverage, leisure and community uses.
- Sufficient land reserved as a receiving site for delivering new education infrastructure as identified in MIR Choice 5. This could be in the form of a Primary or Secondary School.
- Extensive parkland and recreation space.

2.11 In summary, there is demonstrable evidence to suggest that site specific policy for Edinburgh 205 in City Plan 2030 should therefore evolve to reflect this refreshed proposition and we look forward to further dialogue with the council over the coming months as part of preparing its Proposed Plan.

Sustainable travel and accessibility

- 2.12 Edinburgh 205 can already boast extremely strong credentials when it comes to addressing SPP objectives of optimising existing infrastructure, reducing the need to travel, providing for cycling and walking, and enabling the integration of sustainable transport modes. All of these credentials are shown within the masterplan at appendix 1. As described in section 1, the site is uniquely 'infrastructure-ready' to receive development in this regard.
- 2.13 Thanks to a highly integrated public transport service, the site already enjoys high levels of accessibility to and from a significant proportion of Edinburgh by tram, rail and bus. In summary:
- The tram is established through the site with frequent services already operating, including a reserved new stop at the core of the development area.
 - The Ingliston Park and Ride and bus terminus is located on Edinburgh 205's western boundary.
 - The Edinburgh Gateway station to the immediate south east of the site provides access to regular services that operate throughout Edinburgh and further afield including the Fife Circle Line, Perth, Dundee, Aberdeen and Inverness. There is also an interchange with all trams stopping at Edinburgh Gateway.
 - The airport, with onward national and international connections, can be easily reached by frequent tram and bus services.
 - The site is highly accessible within a 30 minute cycle and which is further supported by a comprehensive network of on and off-road cycle routes throughout Edinburgh. The masterplan proposals (at appendix 1) include a new east-west combined pedestrian and cycle link along the southern boundary of the site and which will tie-in with the surrounding network.
- 2.14 In conclusion, due to the range of sustainable transport options identified and quantified above, supported by other measures such as Travel Plans for future development and limited parking availability, it will be possible to achieve very high levels of mode share to sustainable transport modes. Critically, this will reduce the negative impacts of unnecessary car use both for people living and working at the site. Furthermore, this will build on high levels of internalised trips promoted through the careful balancing of people living and working at the site and excellent pedestrian and cycle connectivity adopting international best practice.
- 2.15 With regards to the matter of off-site transport infrastructure, a number of transport assessments and studies have already helped identify and quantify the requirements to support a variety of development proposals within West Edinburgh. This has (in-part) stemmed from considerable collaborative work to date between the public and private sectors through the Edinburgh International Partnership Board and we expect this will continue as part of the emerging West Edinburgh Spatial Study process, for which NIL is a key stakeholder. Insofar as it relates to this site, the outcomes from work to date shows that the necessary infrastructure (where required) can be delivered to enable major development to proceed.

Placemaking

- 2.16 This section is presented as explanatory text for a supporting Placemaking document (at appendix 1) prepared by 7N Architects. 7N has been engaged for many years on the overall vision for west Edinburgh

and has contributed significantly to creating a design framework for the area as well as masterplan-led proposals which have followed, namely phase 1 of the IBG.

2.17 Against this context, it is important to NIL that a consistent approach is adopted in responding primarily to SPP and other relevant guidance such as Planning Advice Note 83 on Masterplanning and the policy statement on Creating Places.

2.18 These emerging proposals have therefore been conceived with particular reference to the various Placemaking Policy Principles in SPP (page 12 onwards), such that they align with these principles. This is summarised below.

2.19 As advocated at paragraph 38 of SPP, the proposals are seeking to create high quality places by taking a design-led approach that considers the relationships between; a successful, sustainable place; a natural, resilient place; a connected place; and a low carbon place.

2.20 As described at paragraph 40, the proposals promote a sustainable pattern of development appropriate to the area by:

- Coordinating an appropriate mix of housing with business development, together with complementary ancillary uses and necessary infrastructure.
- Developing land that is adjacent to an existing settlement and which is already allocated for mixed uses, thereby supporting the creation of more compact, higher density and accessible developments.
- Making a permanent contribution to green and open space networks.
- Locating development where it has already been identified that investment in growth will benefit the vitality of the local and national economy.

2.21 In line with paragraphs 41 to 46, the emerging proposals adopt a design led approach to deliver a high quality development that will demonstrate the six qualities of successful place, namely:

Distinctive

2.22 The proposals have been designed in accordance with the principles and guidance set out in the West Edinburgh Design and Landscape Framework, which establishes an approach that complements local features and landscapes to create a place with a sense of identity.

Safe and pleasant

2.23 The masterplan approach prioritises pedestrian and cycle movement and public transport over vehicular movement in an urban spatial framework that will create an active place and a positive sense of place.

Welcoming

2.24 The spatial and movement framework is also designed to facilitate legibility and distinctiveness.

Adaptable

- 2.25 The masterplan is a flexible framework for development and placemaking rather than a prescriptive, fixed, plan. It is designed to be flexible to respond to future change and adapt to changing circumstances over time.

Resource Efficient

- 2.26 The development concentrates mixed use, high density, development where a significant investment has already been made in public transport infrastructure.

Easy to move around and beyond

- 2.27 The development will prioritise pedestrian and cycle movement and public transport over vehicular movement in a high density urban spatial framework. It will be well connected by an integrated range of travel options and choices.

- 2.28 Taking the approach advocated in **Planning Advice Note 83 on Masterplanning**, the proposals will embody many of the principles of exemplary sustainability at a strategic planning level and which will have the greatest impact. In summary:

- Public transport infrastructure is already in place in the form of the tram, rail and bus, thereby providing effective public transport connections throughout Edinburgh and beyond.
- The proposals embody an urban density of development and an urban approach to spatial planning which optimises the use of the land, whilst taking pressure off land which is currently designated as Greenbelt.
- The density and mix of uses embodies an urban approach to placemaking in common with city centre developments such as Quartermile and Fountainbridge. This mixed use approach blends work space with living space to facilitate the creation of an active place, where people can live where they work and purposefully moves away from the mono-use approach which is evident in other locations on the city edge.

Delivery

- 2.29 Finally, it is important to note that Edinburgh 205 is free of any major constraints and is therefore in a prime position to deliver much needed new development in this part of the city. In summary:

- Edinburgh 205 is an effective deliverable site in single ownership.
- All forms of public transport are already in place.
- The site is surrounded by the necessary existing infrastructure.
- There are no abnormal site conditions which would hinder the delivery of development.

- The first phase of Edinburgh 205 could be started in 2023 and is likely to be logically concentrated around the existing tram stop.
- This area of land is very attractive to the market, enabling rapid placemaking and delivery after commencement.
- Strong public transport and cycle links to the rest of the city already exist.

Summary

- 2.30 Overall, NIL believes that the masterplan set out by 7N positively addresses all of the key policy guides in national planning policy and best practice on masterplanning.
- 2.31 With the site being an already allocated development area and with significant levels of approved local planning authority guidance through the WESDF and WELF, there is a unique opportunity to promote this site as a strong mixed use city extension in City Plan 2020 and to move to the development management stages in early course.
- 2.32 The following sections of this document take forward these proposals into specific responses to various Choices in the MIR.

3. Response to Choices

Introduction

3.1 This section sets out NIL's response to various Choices in the MIR. These should be read in light of section 2 and 7N's masterplan document at appendix 1, which have been provided to give effect to the responses that follow.

3.2 In the first instance, Edinburgh 205 offers a unique opportunity to be an exemplar development which can make a significant contribution to delivering key objectives of the emerging City Plan. In doing so, and as an overarching statement ahead of the detailed representations that follow, by 2030, these proposals will markedly help Edinburgh become:

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

Choice 1 – Making Edinburgh a sustainable, active and connected city

3.3 NIL supports the objective of making Edinburgh a more sustainable, active and connected city. Section 2 clearly illustrates how these proposals can help achieve these objectives and tackle climate change.

3.4 Responding to the various proposed changes, Edinburgh 205 will:

- A Include a network of high-quality green spaces capable of multi-use and which will encourage more walking, cycling and sport. Adhering to the provisions of the West Edinburgh Strategic Landscape Framework will be relevant in this regard.
- B Allow for the provision of green and blue infrastructure, including trees, living roofs and nature-based drainage solutions.
- C Consider how future water management can enable adaptation to climate change.
- E Allow communities to access a variety of green spaces throughout the site, including what is described in Choices as an 'extra-large green space standard' of more than 5 hectares.
- F Allow for new allotments and food growing as part of open space provision within the site.
- H Ensure there are long term maintenance and management arrangements in place for new green spaces.

Choice 2 – Improving the quality, density and accessibility of development

- 3.5 NIL supports the objective of improving the quality, density and accessibility of development in Edinburgh. Section 2 of this document has already described NIL's aspirations for high-quality placemaking and the excellent accessibility credentials of the subject site.
- 3.6 Building on this and responding to the various proposed changes, Edinburgh 205 will:
- A Demonstrate through a design and access statement (at the development management stages) how proposals will incorporate measures to tackle and adapt to climate change, including the future adaptability of buildings and ensuring they are accessible to people with varying needs, age and mobility issues.
 - B Deliver an appropriate level of density consistent with the objective of making the best use of the limited space in the city and to ensure that sites are not under-developed. As an existing site within the defined 'urban area' (see the approved LDP proposals map) and with ready access to public transport services, this is particularly relevant. Edinburgh 205 therefore presents an opportunity to consider higher density development, albeit this will also need to take account of proximity to Edinburgh airport.
 - C Create places, streets and road layouts that reflect the council's Street Design Guidance and the six qualities of successful places in SPP as already described in section 2 of this document.
 - E Deliver quality open space and public realm that will be capable of being used for a range of activities.

Choice 3 – Delivering carbon neutral buildings

- 3.7 NIL is committed to delivering a masterplan for Edinburgh 205 within which the principle of carbon reduction is embedded. To that end, they will continue to appraise the opportunities presented by low and zero-carbon generating technologies to help deliver the council's target to be carbon neutral by 2030.

Choice 4 – Creating Place Briefs and supporting the use of Local Place Plans in our communities

- 3.8 Section 2 of this document together with appendix 1 demonstrates the extent of masterplanning carried out by NIL and the related policy framework which is already in place to guide future development at the subject site. This is very much aligned with the objectives of Choice 4 and will be a key part of the development management stages that follow.
- 3.9 NIL has also carried out extensive consultation with the local community and stakeholders in relation to previous proposals for the site (which are the subject of an extant Proposal of Application Notice reference

15/00225/PAN) and again, this will continue to be at the heart of their development management strategy when these refreshed proposals come forward.

Choice 5 – Delivering Community Infrastructure

- 3.10 NIL supports the principle of ensuring that new development is appropriately supported by necessary infrastructure. As set out in the MIR, this can be achieved by directing development to locations where there is existing infrastructure or where it can be accommodated.

Transport Infrastructure

- 3.11 Pursuant to this objective and as described in section 2, Edinburgh 205 is a unique proposition in that significant transport infrastructure is already in place both within the site itself and at nearby locations, such as Edinburgh Gateway Station. This elevates its status in our opinion to being a genuine 'infrastructure-ready' site capable of receiving development. In terms of the MIR objectives, it demonstrates the sites credentials for reducing carbon emissions, promoting equity, supporting healthier lifestyles and delivering sustainable economic growth. It also demonstrates alignment with the council's aspirations as described in its draft City Mobility Plan.
- 3.12 In relation to other transport infrastructure, NIL supports the principle of a strategic transport corridor towards Newbridge and IBG (corridor 7) and how the development of transit-led solutions (including Bus Rapid Transit and Tram) would support existing major development locally as well as supporting regional level commuting.

Education Infrastructure

- 3.13 We note the findings of the Housing Study into new school infrastructure which is likely to be required to support the housing need identified for City Plan, and that a full education infrastructure appraisal and strategy will support the plan in due course.
- 3.14 This infrastructure is laid out in the MIR according to the three options for delivering new housing at Choice 12 and NIL welcomes the reference to IBG under 'Greenfield Sites' (Choice 12 – Option B) as this is recognition of the new housing contribution which it could make. Consistent with this, NIL has already taken the step of reserving a portion of the site (see page 16, appendix 1) as a potential receiving site for education infrastructure and would welcome dialogue with the council in due course. To this end, the site has the potential to make a significant contribution to delivering the council's education infrastructure needs and requirements in this part of the city.
- 3.15 On a point of detail, we believe that reference to IBG (i.e. Edinburgh 205) would be more appropriately found under the heading of 'Urban Area Sites' and we explain our reasoning for this in response to Choice 12 further on. Indeed, under the sub-heading of 'West Edinburgh' reference is already made to the requirement for a new primary school to accommodate significant pupil growth from any new housing development around the airport. In our submission, this should include Edinburgh 205.
- 3.16 Finally, we understand that the council is reviewing its approach to developer contribution matters in response to a Direction from Scottish Ministers earlier this year not to adopt the finalised version of its

proposed Supplementary Guidance. Outwith this MIR process, NIL may therefore wish to make separate representations to any revised guidance that emerges.

- 3.17 In summary, NIL and their advisers look forward to working with the Council to ensure that any infrastructure that is required to support the delivery of the Edinburgh 205 proposals is appropriately captured within City Plan 2030 and its associated Action Programme in due course.

Choice 6 – Creating places that focus on people, not cars

- 3.18 NIL supports the objective of creating places that focus on people not cars and which prioritise public transport, walking and cycling to encourage active and healthy lives. To achieve this, the MIR states that all development must be well served by existing or planned new public transport, walking and cycling infrastructure.
- 3.19 As described in section 2 and set out within the masterplan document at appendix 1 (See page 11 in particular), these characteristics are already embedded within the site and as such, the proposals are very much aligned with the proposed changes being sought by the council.

Choice 7 – Supporting the reduction in car use in Edinburgh

- 3.20 NIL supports the objective of reducing car use. As with Choice 6, the site can already boast the necessary credentials required to achieve this objective, such as excellent public transport provision. Furthermore, the masterplan proposals will create an environment that prioritises walking and cycling over car use, as well as providing infrastructure that supports electric vehicle charging. As such, the proposals are very much aligned with the proposed changes being sought by the council.
- 3.21 We also note reference at proposed change D to the potential to safeguard an extension to the park and ride at Ingliston as part of the IBG masterplan. This will obviously be a decision for the council in the first instance, albeit NIL supports the principle of this change.

Choice 8 – Delivering new walking and cycling routes

- 3.22 NIL supports the objective of delivering strategic walking and cycling routes as part of the aim of Edinburgh being a green, connected city. As with Choices 6 and 7, the masterplan proposals for the site will create an environment that prioritises walking and cycling over car use. As such, the proposals are very much aligned with the proposed changes being sought by the council.

Choice 11 – Delivering more affordable homes

- 3.23 NIL supports the proposed increase to the provision of affordable housing from 25% to 35% and this has been allowed for, on-site, in the proposals at Edinburgh 205. This could potentially yield an affordable housing provision of 840 homes and would represent, alone, in excess of 4% of the council's target in the next 10 years.

- 3.24 NIL also supports the aspirations set out in proposed change B that such provision should deliver a mix of housing types and tenures, including a percentage for family housing and for the Private Rented Sector (or Build to Rent, as it is otherwise known). Again, these provisions have already been allowed for in the emerging proposals at Edinburgh 205.

Choice 12 – Building our new homes and infrastructure

A. How many new homes does Edinburgh need?

- 3.25 We note the terms of the assessment carried out to determine Edinburgh's housing needs and that this uses the supply targets set out in Strategic Development Plan 1 ('SDP1').
- 3.26 In our submission, this is a flawed approach. There should be no reliance on SDP1 for setting Housing Supply Targets, as SDP1 is now more than 5 years old and is therefore out-of-date (see Scottish Planning Policy paragraph 33).
- 3.27 The MIR's reliance (to some extent) on SDP1 is therefore likely to mean that Edinburgh's Housing Target to 2032, as proposed, will be significantly short of where it should be. This casts serious doubt over the housing land supply options that follow, and with it, the requirement to ensure that sufficient land is being allocated to provide a 5-year effective supply (as required by SPP). In our submission, this lends further support to the scale of housing proposed at Edinburgh 205.
- 3.28 Returning to the council's assessment, HNDA2 is the most up-to-date robust and credible assessment of housing needs and demand. Given that SDP1 is out of date, we agree that HNDA2 should therefore be afforded an appropriate level of consideration in the preparation of City Plan 2030.

B. Who will deliver these homes?

C. Where will we deliver the homes in the most sustainable way?

- 3.29 Whilst laudable, the council's proposed change that it, and its partners, would deliver all new homes solely within the urban area is unrealistic, in our opinion. This is further emphasised by our comments on the amount of new homes that Edinburgh actually needs, as explained above. In our submission, it is inevitable that 'Option 3 – A blended approach' of urban area and greenfield land will be a more realistic proposition in this regard.
- 3.30 Whichever option ultimately comes forward, there can be no doubt, in our opinion, that Edinburgh 205 fulfils all of the required credentials for delivering new homes in the most sustainable way, being the key question posed in the MIR. In summary:
- Edinburgh 205 is, by definition, an 'Urban Area' site. This can be gleaned by reference to the approved Edinburgh LDP proposals map and various maps within the MIR (such as 'Map 1 – A connected, green Edinburgh'). Residential development at Edinburgh 205 would therefore be entirely consistent with the council's preferred approach (as set out in proposed change A) of building new communities at locations which reduce the need to travel, are supported by active and public transport, and would therefore help to meet climate change commitments.

On a related point, whilst NIL welcomes the identification of Edinburgh 205 (referred to as IBG) as a 'potential greenfield allocation' by the council under options 2 and 3 of the MIR insofar as this clearly reinforces its credentials for more housing, such a reference is misleading in our opinion. The site is not 'greenfield' for the reasons set out above and immediately below. Distinct from the assessment of greenfield sites (in the council's Housing Study – January 2020), Edinburgh 205 has already been assessed as a suitable location for housing as evidenced by the current adopted LDP.

- The site is located within a Strategic Development Area, namely West Edinburgh.
- The site is already allocated as a new housing proposal in the approved LDP, as noted above.
- The site is uniquely 'infrastructure-ready' to receive development and has excellent public transport provision already in place (the tram) or very nearby (bus and rail).
- The masterplan allows for a rich mix of uses on site, including a significant element of business use together with ancillary commercial uses, all of which would be easily accessible by foot or bicycle and well within the prescribed walk-time distances set out in the council's Housing Study. The site supports active travel overall.
- The masterplan proposals have been guided by the sustainability principles identified in paragraph 29 of SPP, and in our view adhere to these principles.
- NIL supports the proposed increase to the provision of affordable housing from 25% to 35% and this has been allowed for, on-site, in the proposals. This could potentially yield an affordable housing provision of 840 homes and would provide a mix of housing types and tenures to serve varying needs.
- A generous part of the site has been set aside as a potential receiving site for helping to deliver community infrastructure, in the form of new school provision.

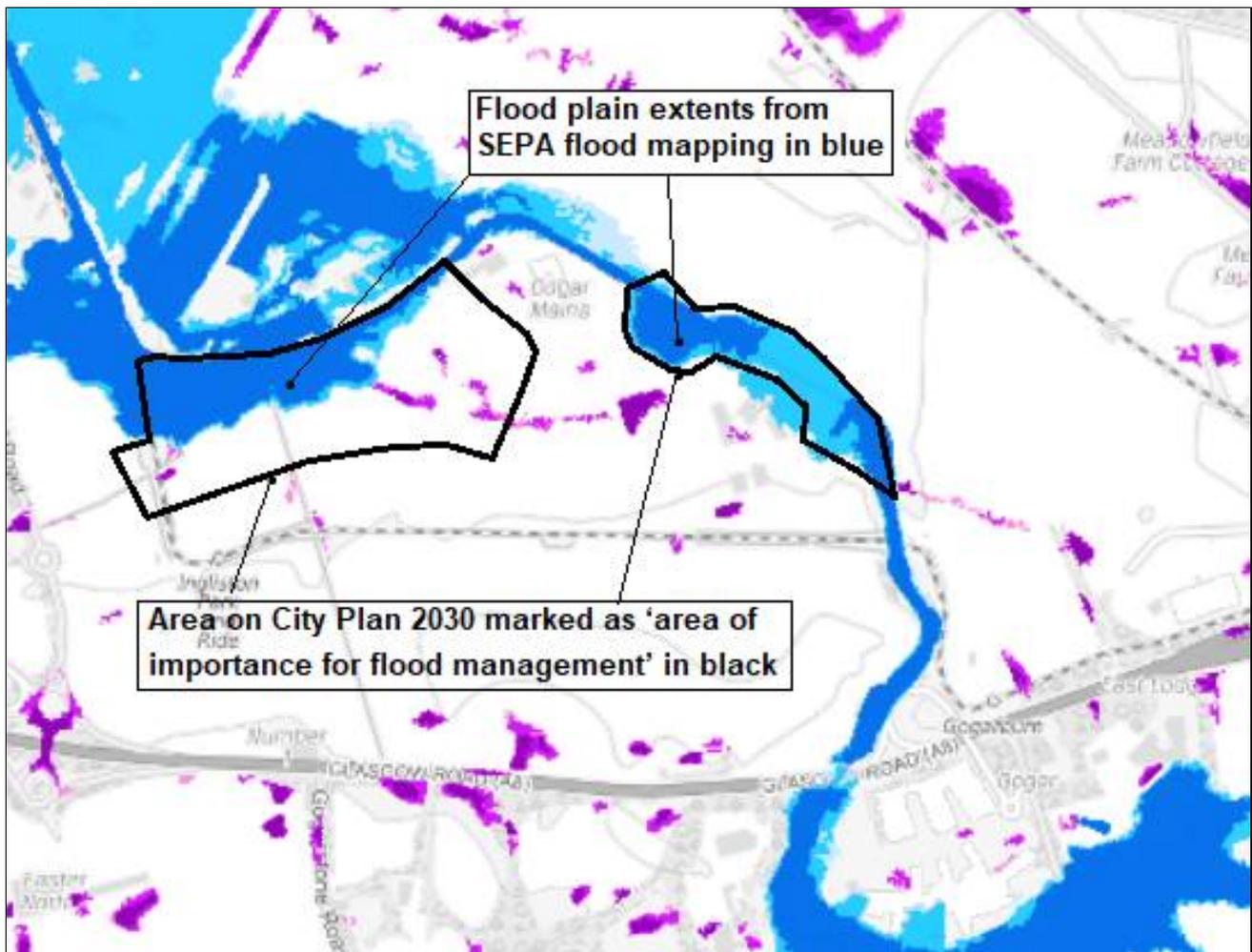
3.31 We wish to raise two specific points of clarification in relation to the development credentials of this site for new housing. Firstly, we note that the 'urban area site assessment' in the council's Housing Study excluded sites protected by an existing employment designation (part 2a, page 1) and we assume this was the reason for this sites exclusion from the assessment. As highlighted above, Edinburgh 205 scores particularly highly against the housing site assessment criteria and in our submission, it should have formed part of the urban area sites identified in the Housing Study. On this basis, we have already set out a case in section 2 of this document that site specific policy should evolve from its current position to reflect a more mixed use allocation at the site.

3.32 The second point relates to flood risk matters where Map 15 on page 44 of the Choices document appears to incorrectly show the 'area of importance of flood management', specifically relating to the Gogar Burn and to the land to the south of Edinburgh Airport.

3.33 These areas for importance for flood management from Map 15 have been superimposed on the image below and outlined in black, and vary very considerably from the SEPA flood mapping in blue. The areas are shown in black on the image below and are taken from:

- Choices document page 39, Map 11 - Area 2 West Edinburgh

- Edinburgh Local Development Plan Proposals Map November 2016



3.34 The definition of an "area of importance for flood management" is not clear from review of the supporting documents to the Choices document, namely:

- The Environmental Report at page 10 shows the current SEPA flood mapping, and cross refers to two other documents, which are;
 - SEPA Flood Risk Management Strategy 2016, that refers to direct flood defences and sediment management on the Gogar Burn, with no further studies carried out to date
 - City Council Local Flood Risk Management Plan 2016, that refers to Edinburgh Airport responsibilities for the Gogar Burn but notes no current plans for works or activities
 - City Council Integrated Catchment Study 2018 which does not appear to have been published

3.35 None of these supporting studies or documents suggests that the area of importance to flood management should be larger than the SEPA flood mapping that shows the functional flood plain, which at this location was also subject of an approved flood risk assessment (submitted with planning application reference 15/05580/PPP) and allocated in the adopted Local Development Plan. These are shown in blue on the image above. It is confirmed that any new development will be subject to Sustainable Urban Drainage Systems (SUDS) that maintain the current run off characteristics of the catchment, in line with current policy.

- 3.36 It is therefore possible that the mapping in the Choices document is indicative only, rather than an accurate representation of the designation described. Whatever the reason for this, it is clear from the evidence noted above that any development allocation of the site in the City Plan 2030 Proposed Plan should therefore confirm that no additional burden shall be placed on the area of land designated an "area of importance for flood management" than is greater than the current SEPA flood mapping.
- 3.37 Adopting the urban area site assessment methodology used by the council, we have therefore summarised our own case (below) based on the many credentials set out above. On the matter of community infrastructure, we believe that a 'partially' suitable classification is justified in that school capacity matters could be mitigated through appropriate intervention. In our submission, this clearly demonstrates overall that the site is suitable for housing-led mixed use development and accordingly is worthy of an appropriate site allocation in the LDP.

Assessment of site Edinburgh 205 adopting Figure 1 site assessment criteria, Housing Study (part 2a)

10m walk to local convenience services	30 minute walk to employment	Access to wider transport network	NCN/Quiet Route 5 year intervention	Active Travel (overall)	Public Transport	Primary Capacity	Secondary capacity	Community Infrastructure overall	Flood Risk	Summary

- 3.38 Notwithstanding our statements above in relation to 'greenfield' sites, we welcome the early identification of guiding development principles which could be applied to housing development sites in West Edinburgh (page 42 of the MIR). These could equally apply to Edinburgh 205 as an 'urban area' site. Indeed, it is worth noting that a number of these principles, such as landscape mitigation, transport infrastructure, education infrastructure and density, are already embedded within the masterplan proposals (see appendix 1). Assuming this approach carries forward to the Proposed Plan stage, we would welcome further dialogue with the council to agree site specific development principles (as well as those relating more generally to development in West Edinburgh) to help inform more detailed proposals as part of a mixed use allocation at the site and the planning application stages that would follow.

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

- 3.39 NIL supports the aspirations to support inclusive growth, innovation, universities and culture, and believes that the masterplan proposals presented within these representations demonstrate how Edinburgh 205 could help to achieve these aims. Indeed, it is encouraging to note that West Edinburgh is already noted in the 'proposed change' for the contribution that it could make to these aims. The masterplan proposals are entirely aligned with the overarching objective of seeking good growth for Edinburgh.

- 3.40 The business space proposed has the potential to cater for a wide variety of needs, including those referred to within the 'proposed change' and we would welcome further dialogue with the council on these matters to ensure that sufficient flexibility is built-into the masterplan to allow for evolution of requirements within these sectors. The related outcomes of the Commercial Needs Studies are also noted in this regard and NIL will continue to be advised on these matters by their retained business space agents.

Choice 14 – Delivering West Edinburgh

- 3.41 NIL supports the principle of a dedicated 'Choice' on 'delivering West Edinburgh' and would strongly endorse that such an approach is carried forward into the Proposed Plan for all the reasons set out in the introduction to this choice. NIL is aware of the emerging West Edinburgh Spatial Study and look forward to making further contributions to its preparation, as a key stakeholder. Edinburgh 205 can play a key role in delivering the full potential of the area, in this regard.
- 3.42 NIL supports the general intent behind 'Proposed Change A', insofar as site allocations in City Plan 2030 should 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. To this end, Edinburgh 205 is a prime candidate site for inclusion in the Proposed Plan as a mixed use allocation.
- 3.43 Focussing on the matter of 'delivery', Edinburgh 205 offers many advantages, notably around the key issue of infrastructure. Earlier parts of this document (in particular paragraph 2.29) and the masterplan proposals (at appendix 1) describe these many advantages. In short, it already benefits from excellent sustainable transport accessibility and is uniquely 'infrastructure-ready' to start receiving development. The site can appropriately be considered as an 'effective' development opportunity in this regard.

Choice 16 – Delivering Office, Business and Industry Floorspace

- 3.44 As set out in the introduction to Choice 16, the nature and scale of business use proposed at Edinburgh 205 would help to ensure that City Plan 2030 can deliver enough floorspace to meet the City's demands.
- 3.45 Based on the key findings of the Edinburgh City Plan 2030 Commercial Needs Study: Office Market (November 2018), we believe that 92,900 sqm (1 M sqft) of business use proposed at Edinburgh 205 is more than sufficient to cater for demands for the following key reasons:
- Edinburgh's existing office stock is 1.85 M sqm (19.9 M sqft) and of this, 20% is already located in West Edinburgh.
 - The majority of market demand is directed toward the city centre.
 - Edinburgh's projected office need for the period 2019-2030 was forecast as being between 17,000 sqm (low requirement) to 30,000 sqm (high requirement) (net) per annum.
 - Two locational options were considered, being balanced growth where 70% of development is in the city centre to match proven demand and 30% elsewhere, and decentralised growth where 50% is in the city centre and 50% elsewhere.

- The most likely scenario based on current trends is for high, balanced growth, meaning a requirement of 106,650 sqm (c1.15 M sqft) in other locations (i.e. outwith the city centre) in the period 2019 to 2030.
- Based on the most likely scenario for other locations, Edinburgh 205 alone would therefore provide 87% of this requirement. In conjunction with the office content of IBG phase 1, Edinburgh 205 creates supply for 2.3M sqft in West Edinburgh, **twice the need identified in the Commercial Needs Study**.
- In addition, there is already a pipeline of 538,000 sqm (5.79 M sqft) of office development with planning permission across the city (excluding projects under construction). 60% of this pipeline is already located in West Edinburgh, with 37% at Edinburgh Park. A further 153,000 sqm of office development proposals were awaiting determination at December 2017 and of this, 80% was in West Edinburgh, notably phase 1 of the IBG (being 122,158 sqm).
- The current available supply of office space should also be taken into consideration. This amounted to 207,663 sqm in Q3 2018. Of this, West Edinburgh had the highest vacancy rate of anywhere in the city at 14%, accounting for 24% of the total stock.
- Against the above context of a vast supply, West Edinburgh has accounted for only 16% of office take-up since 2012.
- Looking at the viability of office development, rents vary significantly by sub-market area. They have declined by 2% over the last 5 years in West Edinburgh. Only the city centre prime rents are sufficient to support new-build development. The other areas' rents would not meet development costs. In simple terms, for business use and associated infrastructure to become a viable proposition at Edinburgh 205, it must therefore be supported by a significant residential component, as proposed.
- Reflecting on the above points, the scale of business use proposed at Edinburgh 205 is clearly more than sufficient to ensure that office needs can be met, up to, and well beyond, 2030.

3.46 Other points from the Commercial Needs Study which are worth noting include:

- One of the office market priorities for City Plan 2030 is to capture the potential of off-centre office locations through transport investment and diversification to include a full range of land uses. This lends further support to the Edinburgh 205 masterplan proposals in diversifying away from business-led to embrace a fuller and more balanced range of land uses.
- As evidenced in our response to Choice 13, a flexible approach to the provision of business space is proposed within the masterplan to ensure this supports changing requirements in key sectors and allows for the realisation of new opportunities as they come forward.

3.47 In light of the above considerations, it will be important to monitor business space market demand and supply characteristics, and therefore the viability of such space relative to the land use and placemaking objectives for Edinburgh 205 as set out within these representations.

3.48 Reflecting on all of the above, whilst NIL continue to support the principle of a strategic office location at Edinburgh 205, this should be in the context of an allocation for mixed uses that now includes a much

greater proportion of residential uses. Section 2 sets out a detailed justification for this approach and the manner in which site specific policy should evolve in the LDP Proposed Plan to reflect this position.

4. Summary and Conclusions

4.1 On behalf of New Ingliston Ltd, we welcome this opportunity to submit representations to Choices for City Plan 2030.

4.2 In our submission, Edinburgh 205 presents a unique opportunity for a connected, mixed-use, sustainable extension to the city in West Edinburgh and represents a compelling candidate case for inclusion in the new LDP Proposed Plan later this year.

4.3 In summary:

- Edinburgh 205 creates a viable and deliverable mixed use place attractive to the market
- It delivers a sustainable city extension which supports everyone's physical and mental wellbeing
- It creates a city extension where you don't need a car to move around
- It creates 840 affordable homes and a place where people can live in a home they can afford, and
- Delivers a city where everyone shares in its economic success

4.4 We look forward to discussing the case presented within this submission with the council in due course and would invite you to contact Rob Newton (0131 4696019) at Avison Young in this regard.

Appendix I
Edinburgh 205 Masterplan
Document by 7N Architects

Contact Details

Enquiries

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Visit us online

avisonyoung.co.uk

Edinburgh 205

A Connected, Mixed-Use, Sustainable
Extension To The City

This report presents revised proposals for the Edinburgh 205 Masterplan in support of representations to CEC's Choices for City Plan 2030 on behalf of New Ingliston Ltd. It should be read in conjunction with Avison Young's written representation of April 2020.

The masterplan responds to the ambitious vision for Edinburgh which is presented in CEC's Choices for City Plan 2030 and Mobility Strategy to establish a placemaking and development framework to create a well-connected, sustainable place which will deliver 35% Affordable Housing and a range of opportunities for inclusive growth.

April 2020

Edinburgh 205

A new extension to the city,
well connected by Edinburgh's
tram system, which will deliver
inclusive growth and 35%
affordable housing.



The Edinburgh 205 Masterplan



Edinburgh
Airport

Ingliston
Park and
Ride

IBG Phase 1

Edinburgh 205

Gogar Link

Tram Depot

Gogarburn

Cycle Network

RBS

Edinburgh 205 In The Wider Context



Edinburgh
Airport

Edinburgh
205

Crosswinds/
Gogar Link

Park and Ride/
Bus Terminus

Edinburgh
Gateway

International
Business Gateway
Phase 1

RBS

Edinburgh
Park

International Business Gateway 2,300,000 sq.ft of Business Space



- Business Space
- Mixed Use
- Residential
- Education

The combination of Edinburgh 205 and IBG Phase 1 will deliver 2,300,000 sq.ft of business space.

The Future Business Space Supply In West Edinburgh Will Be Over 4,000,000 sq.ft



International Business Gateway
2,300,000 sq.ft

Crosswinds
800,000 sq.ft

Edinburgh Park
1,000,000 sq.ft

Garden District

Heriot Watt Research Park

By 2030, This New Place Can Help Edinburgh To Be:

A sustainable city which supports everyone's physical and mental wellbeing

A city which everyone lives in a home they can afford

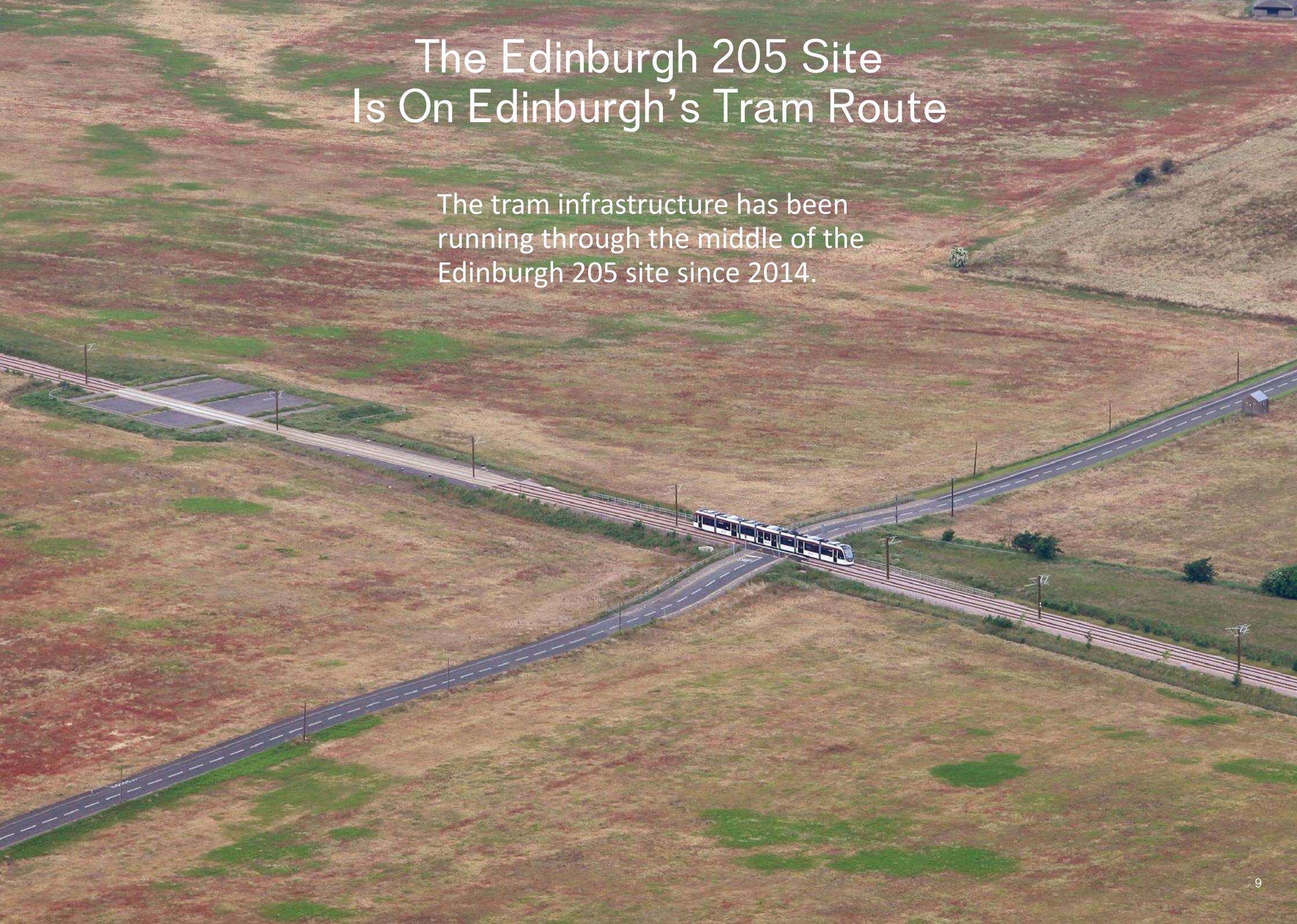
A city where you don't need to own a car to move around

A city where everyone shares in its economic success

From CEC, Choices for City Plan 2030, 2020

The Edinburgh 205 Site Is On Edinburgh's Tram Route

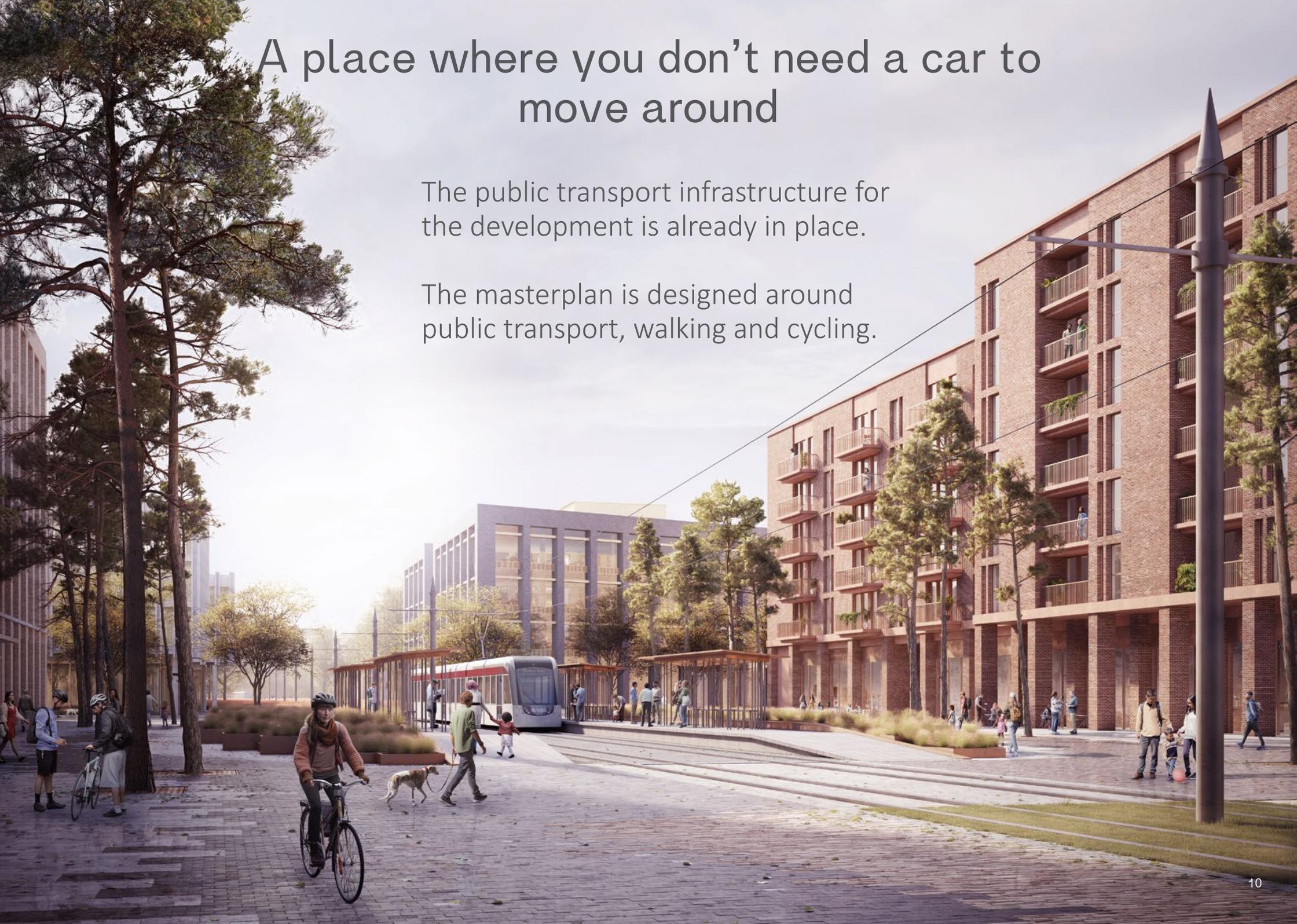
The tram infrastructure has been running through the middle of the Edinburgh 205 site since 2014.



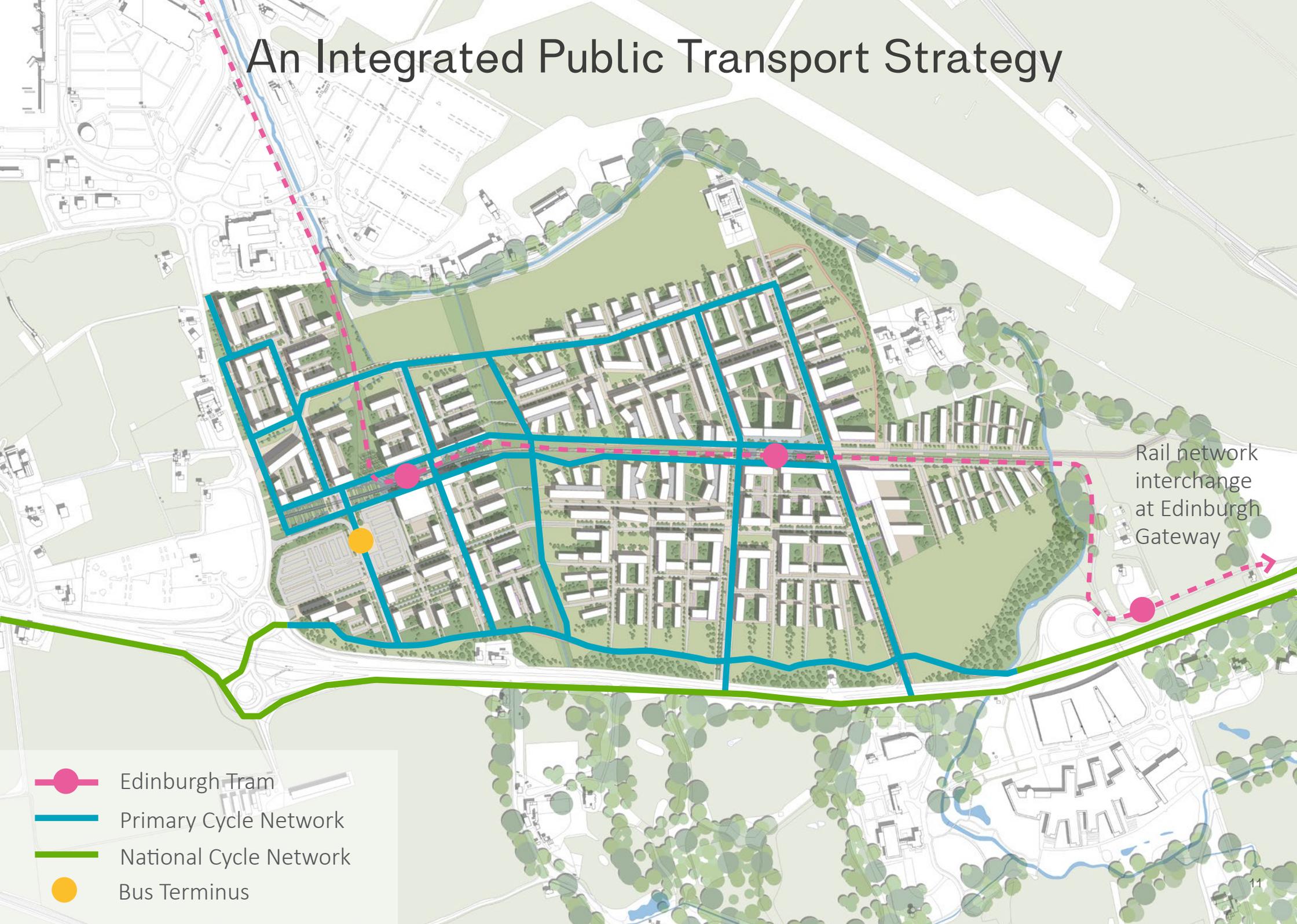
A place where you don't need a car to move around

The public transport infrastructure for the development is already in place.

The masterplan is designed around public transport, walking and cycling.



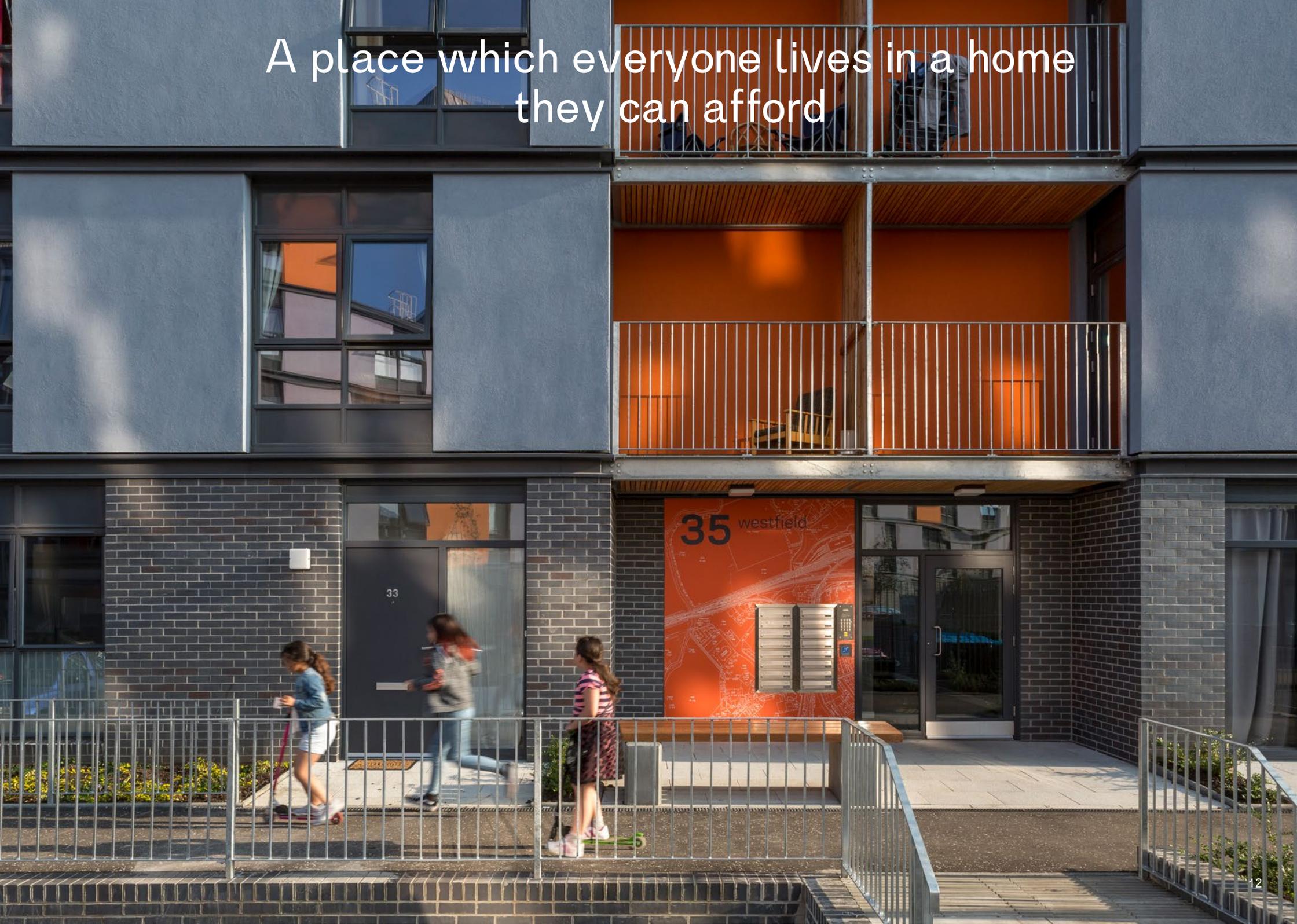
An Integrated Public Transport Strategy



Rail network
interchange
at Edinburgh
Gateway

- Edinburgh Tram
- Primary Cycle Network
- National Cycle Network
- Bus Terminus

A place which everyone lives in a home
they can afford



Edinburgh 205 Will Provide 35% Affordable Housing



A Range Of Housing Types and Tenures



Edinburgh 205 will deliver a range of housing types and tenures at an average density circa 90 dwellings per hectare.

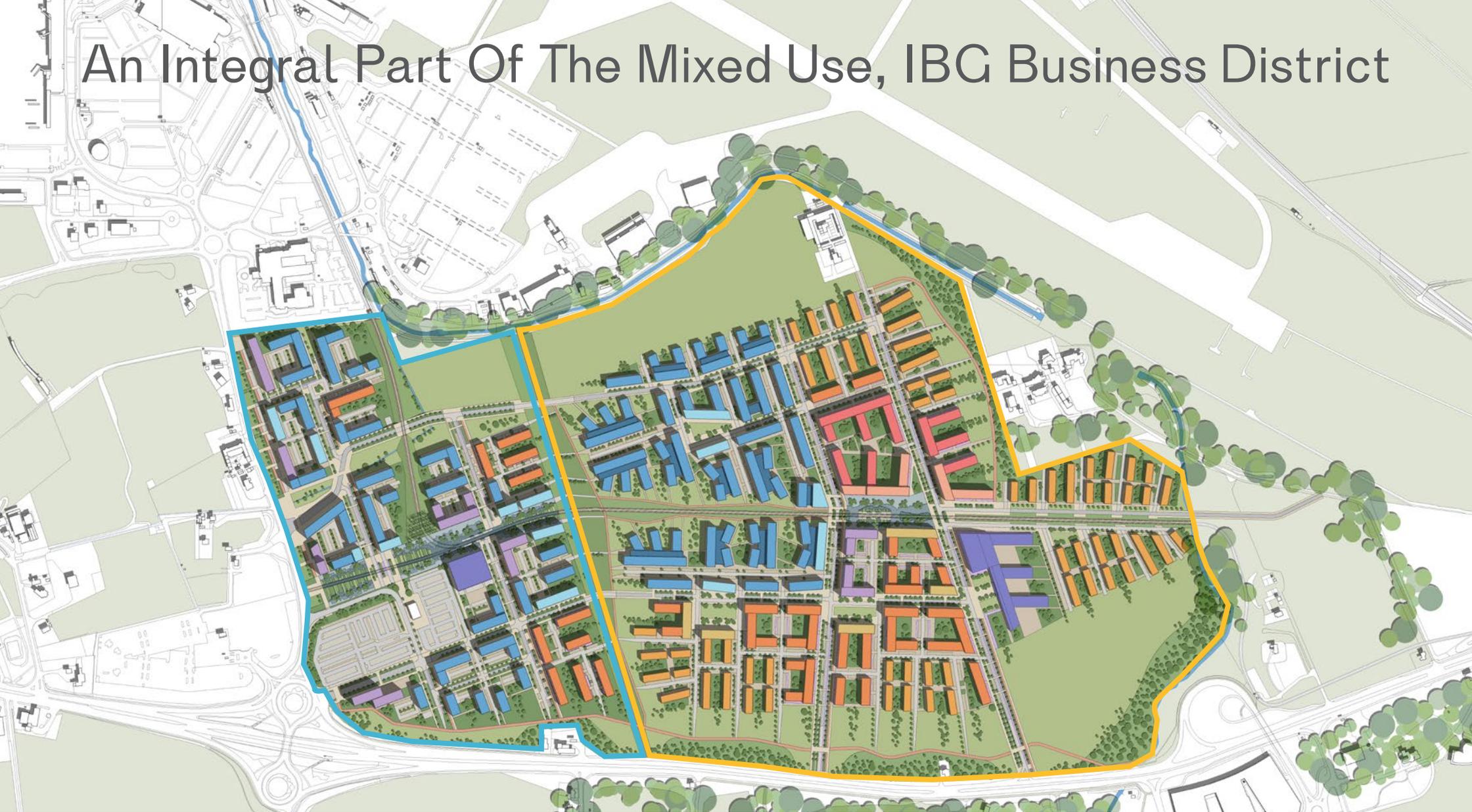
- Build To Rent
- Apartments
- Terraced Houses

A city where everyone shares in its economic success

Edinburgh 205 will integrate 1,000,000 sq.ft of business space with 2,400 new homes, 35% of which will be Affordable, all connected to the City Centre by tram. The initial business space will be aimed at mid-market occupiers including start ups and scale ups.

This development represents a shift away from the out of town business park model to a mixed use, urban density, place.

An Integral Part Of The Mixed Use, IBC Business District



 IBC Phase 1

 Business Space, 1,300,000 sq.ft

 Active Ground Floor Uses

 Hotel, 1150 beds

 Apartments, 396 dwellings

 Edinburgh 205

 Business Space, 1,000,000 sq.ft

 Active Ground Floor Uses

 Build To Rent, 800 dwellings

 Active Ground Floor Uses

 Apartments, 1,200 dwellings

 Active Ground Floor Uses

 Terraced Houses, 400 dwellings

 Hotel, 350 beds

 Education

A sustainable city which supports everyone's physical and mental wellbeing



Tram



Bus



Train



Low carbon energy



Car Club



Electric Charging



Cycling



Walking



Green Space

Phased Delivery



Initial phases of development will be clustered around the tram stop in the heart of the new district. This will focus on Build To Rent and Affordable residential to create early inhabitation and footfall to help to establish ancillary mixed uses and amenities. This initial phase will also include mid-market work space funded by the residential.

In Summary

Edinburgh 205 will provide:

- 2,400 homes at an average density of circa 90 dwellings/Ha.
- Including 840 Affordable Homes (35%)
- 1,000,000 sq.ft of business space (2.3m sq.ft inc. IBG Phase One)
- 350 hotel rooms
- Mixed use space
- Community amenities
- Education facilities
- Extensive parkland and recreation space

A new city extension with the tram, train, bus, cycling and walking at the heart of the development.

Edinburgh 205



Edinburgh 205



