Customer Ref:	00001	Response Ref:	ANON-KU2U-GPU8-B	Support	ing Info	Yes		
Name	Lisa Proudfoot			Email	isa.proudfoc	t@montagu-evans.co.	uk	
Response Type	Agent / Consul	tant						
On behalf of:	Russell Road Ed	dinburgh Ltd						
Choice	1 A							
			es together as part of a city-wid	e, regional, and n	ational gree	n network. We want n	ew development	t to connect to, and
deliver this netwo	ork. Do you agree	with this? - Select s	upport / don't support					
Charl Barrer	V							
Short Response	Yes							
Explanation	-		y to the existing greenspaces of I centres of Roseburn and Gorgi				•	
			ge, with the Russell Road site sitt					l l
	Paths which will	integrate it with the	wider cycle network.					
Choice	1 B							
We want to chan	ge our policy to r	equire all developm	ent (including change of use) to	include green an	d blue infras	structure. Do you agre	e with this? - Sup	pport / Object
<b>Short Response</b>	Not answered							
Explanation								

<b>Customer Ref:</b>	00001	Response Ref:	ANON-KU2U-	-GPU8-B	Suppor	ting Info	Yes	S						
Name	Lisa Proudfoot				Email	lisa.proudf	foot@	monta	agu-eva	ns.co.uk				
Response Type	Agent / Consultan	t												
On behalf of:	Russell Road Edinb	ourgh Ltd												
Choice	1 C													
	ify areas that can be	a used for future	water manager	mont to onable a	dantation to clin	nata chang	ro Do		groo wi	i+h +hic2	Voc / No			
we want to ident	iny areas that can be	e used for future	water manager	ment to enable a	uaptation to cim	nate chang	ge. Do	you a	gree wi	ıtıı tılısı ·	- res / ivo	<u>J</u>		
Short Response	Not Answered													
Explanation	rtot/tilstrered													
Choice	1 D													
	1 D		11							<b></b> .	l.I. B.		111.11.12	
Yes / No	ly set out under wha	at circumstances	tne developme	nt of poor quality	y or unaerusea c	open space	e will k	be con	siaerea	ассерта	bie. Do y	ou agree	with this? -	
-														
Short Response	Not Answered													
Explanation														
Explanation														
Choice	1 E													
	duce a new 'extra-la	rge green space s	standard' whicl	h recognises that	as we grow com	nmunities w	will ne	eed acc	cess to	green sp	aces mor	re than 5	hectares. Do	
you agree with th	is? - Yes / No													
<b>Short Response</b>	Not Answered													
Explanation	The subject site lies		-											-
	to better connect the Fountainbridge green Paths which will into	en network linkag	e, with the Rus	sell Road site sitti										
		-0.000.000.000												

Customer Ref:	00001	Response Ref:	ANON-KU2U-GPU8-B	Supporting Info	Yes		
Name	Lisa Proudfoo	ot		Email lisa.proudf	oot@monta	agu-evans.co.uk	
Response Type	Agent / Consu	ultant					
On behalf of:	Russell Road	Edinburgh Ltd					
Choice	1 F						
We want to ident this? - Yes / No	ify specific site	s for new allotments a	nd food growing, both as part o	of new development sites a	nd within o	open space in the urban	area. Do you agree with
Short Response Explanation	Not Answered						
Choice	1 F						
We want to ident this? - Upload (ma		s for new allotments a	nd food growing, both as part o	of new development sites a	nd within o	open space in the urban	area. Do you agree with
Short Response	No						
Explanation							
Choice	1 G						
We want to ident	ify space for ac	lditional cemetery pro	vision, including the potential f	for green and woodland bu	rials. Do yo	u agree with this? - Yes	/ No
Short Response Explanation	Not Answered						

Customer Ref:	00001	Response Ref:	ANON-KU2U-GPU8-B	Supporting Info	Yes		
Name	Lisa Proudfoot			Email lisa.prou	udfoot@mo	ntagu-evans.co.uk	Ī
Response Type	Agent / Consu	tant					
On behalf of:	Russell Road E	dinburgh Ltd					
Choice	1 H						
		licies and green spac	e designations to ensure that	new green spaces have lo	ng term mai	intenance and management arra	ngements in place.
Do you agree with				<b>0</b>			0 1 1 1
Short Response	Not Answered						
Explanation							
Choice	2 A						
		ing change of use). th	rough design and access state	ements. to demonstrate h	ow their de	sign will incorporate measures to	tackle and adapt
	•					mobility issues as a key part of th	•
Short Response	Not Answered						
Explanation							
Choice	2 B						
We want to revise Yes / No	e our policies on	density to ensure the	at we make best use of the lir	nited space in our city and	that sites a	re not under-developed. Do you	agree with this? -
Short Response	Yes						
•	more positive st	tep to ensuring that th	ne scarce number of developm	nent sites in Edinburgh's ur	ban areas ar	relative to a proposals surroundir re maximised and support the effi lated amongst high-quality active	cient use of land.

Customer Ref:	00001 Response Ref: ANON-KU2U-GPU8-B	Supporting Info Yes
Name	Lisa Proudfoot	Email lisa.proudfoot@montagu-evans.co.uk
Response Type	Agent / Consultant	
On behalf of:	Russell Road Edinburgh Ltd	
Choice	2 C	
We want to revise	e our design and layout policies to achieve ensure their layouts deli	iver active travel and connectivity links. Do you agree with this? - Yes / No
Short Response Explanation	·	f successful places in Scottish Planning Policy in that they are safe and pleasant, easy to . The proposed site could easily and effectively link into existing active travel routes

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 Not Answered

**Explanation** 

Our clients would agree that quality open space and public realm can enrich an urban environment and would encourage the Council to support innovative approaches to delivering open space and public realm as part of a higher density development where available space may be constrained. It is considered that requirements should be applied on a case-by-case qualitative approach to assessing open space and public realm provision as part of a high density development, taking into account factors such as the surrounding area of a particular site, existing amenity spaces in proximity to a development site, and the expected end users of a development.

<b>Customer Ref:</b>	00001 Response Ref: ANON-KU2U-GPU8-B	Supporting Info Yes
Name	Lisa Proudfoot	Email lisa.proudfoot@montagu-evans.co.uk
Response Type	Agent / Consultant	
On behalf of:	Russell Road Edinburgh Ltd	
Choice	3 A	
	lings and conversions to meet the zero carbon / platinum standar neet the bronze, silver or gold standard. Which standard should r	ds as set out in the current Scottish Building Regulations. Instead we could require new new development in Edinburgh meet? - Which standard?
Short Response	Not Answered	
Explanation	Not Answered	
Choice	4 A	
	with local communities to prepare Place Briefs for areas and site althcare infrastructure development should deliver. Do you agre-	s within City Plan 2030 highlighting the key elements of design, layout, and transport, e with this? - Yes / No
Short Response	Not Answered	
Explanation	Not Answered	
	·	
Choice	4 B	
		n 2030 will set out how Local Place Plans can help us achieve great places and support
We want to supp		
We want to supp community ambit	ort Local Place Plans being prepared by our communities. City Pla tions How should the Council work with local communities to p	
We want to supp community ambit Short Response	ort Local Place Plans being prepared by our communities. City Plations How should the Council work with local communities to p	
We want to supp community ambit	ort Local Place Plans being prepared by our communities. City Pla tions How should the Council work with local communities to p	
We want to supp community ambit Short Response	ort Local Place Plans being prepared by our communities. City Plations How should the Council work with local communities to p	

<b>Customer Ref:</b>	00001 Response Ref:	ANON-KU2U-GPU8-B	Supporting Info	Yes	
Name	Lisa Proudfoot		Email lisa.proudf	oot@montagu-evans.co.uk	
Response Type	Agent / Consultant				
On behalf of:	Russell Road Edinburgh Ltd				
Choice	5 A				
-	n 2030 to direct development to where rastructure will be accommodated and	-		tion, healthcare and sustainable transport	t, or where
potential new inii	astructure will be accommodated and	deliverable within the plan period.	Do you agree with th	is: - res / NO	
Short Response	Not answered				
Explanation	The subject site and wider area are con	eveniently located within existing infr	astructure, including	education, healthcare and sustainable tran	sport connections.
Choice	5 B				
_	n 2030 to set out where new communit od sustainable public transport service	•		nected to active travel routes and in location	ons with high
, , , ,					
Short Response	Not Answered				
Explanation					
Choice	5 C				
	et the desire to co-locate our communit ree with this? - Yes / No	ty services close to the communities	they serve, supporti	ng a high walk-in population and reducing	the need to
Short Response	Not Answered				

<b>Customer Ref:</b>	00001 Response Ref: ANON-KU2U-GPU8-B	Supporting Info Yes
Name	Lisa Proudfoot	Email lisa.proudfoot@montagu-evans.co.uk
Response Type	Agent / Consultant	
On behalf of:	Russell Road Edinburgh Ltd	
Choice	5 D1	
We want to set ou	it in the plan where development will be expected to contribute to	ward new or expanded community infrastructure. Do you agree with this? - Yes / No
Short Response	Not Answered	
Explanation		
·		
Choice	5 D2	
	umulative contribution zones to determine infrastructure actions, c	osts and delivery mechanisms. Do you agree with this? - Yes / No
The traine to use of	annualise continuation zones to determine initiast detaile detions, e	osto una denvery medianismo. Do you agree with timo. Tesy no
Short Response	Not Anguard	
	Not Answered	
Explanation		
Choice	5 E	
We want to stop u		contributions within the plan, Action Programme and in non-statutory guidance. Do
, ou agree with the		
Short Response	Not Answered	
	NOT Allsweieu	
Explanation		

Customer Ref:	00001	Response Ref:	ANON-KU2U-GPU8-B	3	Supporting Info	Yes			
Name	Lisa Proudfoot			<u> </u>	Email lisa.proudf	foot@mo	ntagu-evans.co.	uk	
Response Type	Agent / Consultar	nt		<u> </u>					_
On behalf of:	Russell Road Edin	burgh Ltd							
Choice	6 A								
	• •	•	ment against its ability ervices and high-qualit	_	•		-	and cycling. The	se targets will vary
Short Response	Not Answered								
Explanation	The subject site at are good linkages v		ontribute and take stre policy.	ength from its exis	ting connections fo	or public t	ransport usage, v	walking and cycl	ing, therefore there
Choice	6 B								
			by walking, cycling an c transport. Do you a			and plan	ned transit inter	rventions. This v	vill determine
Short Response Explanation	Not Answered								
Choice	7 A								
		•	based on targets for tr to control on-street p		•	•	These targets co	ould be set by a	ea, development
Short Response	Not answered								

Again the subject site at Russell Road can contribute and take strength from its existing connections for public transport usage, walking and cycling.

Customer Ref:	00001 Response Ref: ANOI	N-KU2U-GPU8-B	upporting Info Yes	
Name	Lisa Proudfoot	E	mail lisa.proudfoot@montagu-evans.co.u	ık
Response Type	Agent / Consultant			
On behalf of:	Russell Road Edinburgh Ltd			
Choice	7 B			
We want to protect you agree with this	t against the development of additional case? - Yes / No	ar parking in the city centre to supp	ort the delivery of the Council's city centro	e transformation programme. Do
Short Response Explanation	Not Answered			
Choice	7 C			
We want to updat agree with this? - \	e our parking policies to control demand and exercises / No	nd to support parking for bikes, tho	se with disabilities and electric vehicles vi	a charging infrastructure. Do you
Short Response Explanation	Not Answered			
Choice	7 D			
Mobility Plan or it	rt the city's park and ride infrastructure by action plan. Do you agree with this? - We ng any other sites that are identified in the	want to support the city's park and	I ride infrastructure by safeguarding sites	-
Short Response Explanation	Not Answered			

							7	
Customer Ref:	00001	Response Ref:	ANON-KU2U-GPU8-B	Suppo	orting Info	Yes		
Name	Lisa Proudfoot			Email	lisa.proudf	oot@monta	agu-evans.co.uk	
Response Type	Agent / Consultar	nt						
On behalf of:	Russell Road Edir	ıburgh Ltd						
Choice	8 A							
We want to upda	ite our policy on the	e Cycle and Footpa	ath Network to provide criteria	for identifying	new routes.	Do you agre	ee with this? - Yes / No	
Short Response	Not Answered							
Explanation	West Edinburgh Li will require to be e	nk as part of the wi	ough change of use and reconfig ider vision for the area, and fur ell Road site currently sits direct cycle network.	ther consideration	on of specific	opportunit	ties to provide direct and indir	ect linkages to both
Choice	8 B							
•	•		ouncil and partner projects to i o our network as active travel		•		•	
<b>Short Response</b>	Yes							
Explanation								

<b>Customer Ref:</b>	00001	Response Ref:	ANON-KU2U-	-GPU8-B	Supporting Info	Yes		
Name	Lisa Proudfoot				<b>Email</b> lisa.proud	foot@montagu-evans.co.uk		
Response Type	Agent / Consultar	nt						
On behalf of:	Russell Road Edin	burgh Ltd						
Choice	8 C							
to include any ne	•	ravel links which n	nay be identifie			options for allocated sites. We also wa port Appraisal, the City Mobility Plan,	•	
<b>Short Response</b>	Yes							
Explanation								
Choice	8 C							
to include any ne	•	ravel links which n	nay be identifie	ed in the forthcom		options for allocated sites. We also wa port Appraisal, the City Mobility Plan,	-	
Short Response	No							
Explanation		4						

Customer Ref:	00001 Response Ref: ANON-KU2	U-GPU8-B Supporting Info	Yes
Name	Lisa Proudfoot	<b>Email</b> lisa.prou	udfoot@montagu-evans.co.uk
Response Type	Agent / Consultant		
On behalf of:	Russell Road Edinburgh Ltd		
Choice	9 A		
	ult on designating Edinburgh, or parts of Edinburg perties for short-term lets. Do you agree with this a		planning permission will always be required for the change of
Short Response	Not Answered		
Explanation	Not Answered		
Choice	9 B		
	e a new policy on the loss of homes to alternative to short-stay commercial visitor accommodation o		anning permission is required for a change of use of residential / No
Short Response	Not Answered		
Explanation	Not Answered		

Customer Ref:	00001 Response Ref: ANON-KU2U-GPU8-B	Supporting Info Yes
Name	Lisa Proudfoot	Email lisa.proudfoot@montagu-evans.co.uk
Response Type	Agent / Consultant	
On behalf of:	Russell Road Edinburgh Ltd	

#### 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 No.

#### **Explanation**

Our clients would be concerned in relation to the proposed policy option that may require all future PBSA in Edinburgh to be built for and managed by a university or college in the city. If the Council choose to implement this, there is a risk that the policy option could create a monopoly over PBSA in the city. which could reduce competition between operators, adversely impacting on pricing, and diverting future investment away from Edinburgh. In terms of where PBSA should be located, our clients agree with the Council's current approach under 'Policy Hou 8 Student Accommodation' that PBSA should be granted when it is appropriately located in terms of access to a university or college by walking, cycling or public transport, Good connectivity is an important factor in reducing the need for students to travel, enhancing student satisfaction and working towards improving environmental sustainability. It is widely recognised that a variety of formats of student accommodation is important in providing a range and choice of accommodation to meet the wide ranging demands and preferences of all students. We would submit that it is inappropriate for the Council to single out one form of student accommodation product. without any evidence to support the approach. We would question how the Council have derived the maximum figure of 10% studio flats proposed and how this should be enforced if it can be demonstrated by developers / operators that there is existing market demand for these types of residences from students.

In addition, the proposed restriction on the number of studios fails to acknowledge the importance of studio style living in terms of future proofing. Studios are suitable for conversion to Build to Rent and co-living as an example, both of which are likely to play an important role in the city's future housing mix.

Customer Ref:	00001 Response Ref:	ANON-KU2U-GPU8-B	Supporting Info Yes  Email lisa.proudfoot@montagu-evans.co.uk	
Response Type	Agent / Consultant			
On behalf of:	Russell Road Edinburgh Ltd			
Choice	10 B			
We want to creat this? - Yes / No	te a new policy framework which set	ts out a requirement for housing	g on all sites over a certain size coming forward for development. Do you ag	gree with
this? - Yes / No		ts out a requirement for housing	g on all sites over a certain size coming forward for development. Do you ag	gree with
this? - Yes / No	No  The focus of any PBSA policy approabalanced view of all relevant factors	ach should be on the acceptability s of importance to determining th in the application of this balanced	g on all sites over a certain size coming forward for development. Do you ago ty of the use in principle. The intention with such an approach would be to all the suitability of a proposal, and also allow for changing circumstances throug d assessment. There would be concern with sites which just meet the 0.25 he	ow a ghout the

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 Not Answered

<b>Customer Ref:</b>	00001 Response Ref:	ANON-KU2U-GPU8-B	Supporting Info	Yes
Name	Lisa Proudfoot		Email lisa.proudf	foot@montagu-evans.co.uk
Response Type	Agent / Consultant			
On behalf of:	Russell Road Edinburgh Ltd			
Choice	11 A			
We want to amen	d our policy to increase the provisio	n of affordable housing requirem	ent from 25% to 35%. Do	you agree with this approach? - Yes / No
Short Response	No			
Explanation				rticularly when applied to all land coming forward for other round tenure and models / definitions of affordable housing

### Choice 11 B

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

Short Response Not Answered

product.

Customer Ref:	00001	Response Ref:	ANON-KU2U-GPU8-B	Supporting Info	Yes	
Name	Lisa Proudfoo	t		<b>Email</b> lisa.proudfo	pot@montagu-evans.co.uk	
Response Type	Agent / Consu	ıltant				
On behalf of:	Russell Road I	Edinburgh Ltd				
Choice	12 A					
Which option do	you support? -	Option 1/2/3				
<b>Short Response</b>	Option 1 (Coun	icil/				
Explanation	development a the transport h into the city us	nd including student a ub of Haymarket, and	ccommodation. The Russell Ro situated between the neighbou	ad site is in a pivotal location urhood centres of Roseburn a	h are primed for redevelopment, particula located to the west of the city centre, 10 n nd Gorgie. There is an opportunity to betto pirations for the wider area could include	ninutes' walk from er link this site
						ď
Choice	12 B1					
Do you support o	r object to any	of the proposed green	field areas? (Please tick all tha	nt apply) - Support Greenfield	l - Support - Calderwood	
<b>Short Response</b>	Not Answered					
Explanation						
Choice	12 B2					
Do you support o	r object to any	of the proposed green	field areas? (Please tick all tha	nt apply) - Support Greenfield	l - Support - Kirkliston	
Short Response	Not Answered					
Explanation						

Customer Ref:	00001 Response Re	ef: ANON-KU2U-GPU8-B	Supporting Info	Yes
Name	Lisa Proudfoot		Email lisa.proudf	oot@montagu-evans.co.uk
Response Type	Agent / Consultant			
On behalf of:	Russell Road Edinburgh Ltd			
Choice	12 B3			
Do you support o	r object to any of the proposed g	reenfield areas? (Please tick all tha	t apply) - Support Greenfiel	d - Support - West Edinburgh
<b>Short Response</b>	Not Answered			
Explanation				
Choice	12 B4			
Do you support o	r object to any of the proposed g	reenfield areas? (Please tick all tha	t apply) - Support Greenfiel	d - Support - East of Riccarton
<b>Short Response</b>	Not Answered			
Explanation				
Choice	12 B5			
Do you support o	r object to any of the proposed g	reenfield areas? (Please tick all tha	t apply) - Support Greenfiel	d - Support - South East Edinburgh
Short Response	Not Answered			
Explanation				

Customer Ref:	00001 Response Ref: ANON-KU2U-GPU8-B	Supporting Info Yes
Name	Lisa Proudfoot	Email lisa.proudfoot@montagu-evans.co.uk
Response Type	Agent / Consultant	
On behalf of:	Russell Road Edinburgh Ltd	
Choice	12 B6	
Do you support o	r object to any of the proposed greenfield areas? (Please tick all that a	pply) - Support Greenfield - Object - Calderwood
<b>Short Response</b>	Not Answered	
Explanation		
Choice	12 B7	
Do you support o	r object to any of the proposed greenfield areas? (Please tick all that a	pply) - Support Greenfield - Object - Kirkliston
<b>Short Response</b>	Not Answered	
Explanation		
Choice	12 B8	
Do you support o	r object to any of the proposed greenfield areas? (Please tick all that a	pply) - Support Greenfield - Object - West Edinburgh
Short Response	Not Answered	
Explanation		

Customer Ref:	00001	Response Ref:	ANON-KU2U-GPU8-B	Supporting Info	Yes
Name	Lisa Proudfoot			<b>Email</b> lisa.proudf	foot@montagu-evans.co.uk
Response Type	Agent / Consul	tant			
On behalf of:	Russell Road E	dinburgh Ltd			
Choice	12 B9				
Do you support o	r object to any o	f the proposed greer	ifield areas? (Please tick all tha	t apply) - Support Greenfiel	d - Object - East of Riccarton
Short Response	Not Answered				
Explanation					
Choice	12 B10				
Do you support o	r object to any o	f the proposed greer	field areas? (Please tick all tha	t apply) - Support Greenfiel	d - Object - South East Edinburgh
<b>Short Response</b>	Not Answered				
Explanation					
Choice	12 BX				
Do you support o	r object to any o	f the proposed greer	field areas? (Please tick all tha	t apply) - Explain why	
Short Response	Not answered				
Explanation					

<b>Customer Ref:</b>	00001	Response Ref:	ANON-KU2U-GPU8-B	Suppo	orting Info	Yes		
Name	Lisa Proudfoo	pt		Email	lisa.proudfo	oot@monta	igu-evans.co.uk	
Response Type	Agent / Consu	ultant						
On behalf of:	Russell Road	Edinburgh Ltd						
Choice	12 C							
Do you have a gro	eenfield site yo	u wish us to consider i	n the proposed Plan? - Greenf	ield file upload				
<b>Short Response</b>	No							
Explanation								
Choice	12 C							
Do you have a gro	eenfield site yo	u wish us to consider i	n the proposed Plan? - Greenf	ield file upload				
Short Response	No							
Explanation								
Choice	12 C							
Do you have a gro	eenfield site yo	u wish us to consider i	n the proposed Plan? - Greenf	ield file upload				
Short Response	No							
Explanation								

Customer Ref:	00001 Response Ref: ANON-KU2U-GPU8-B	Supporting Info Yes
Name	Lisa Proudfoot	Email lisa.proudfoot@montagu-evans.co.uk
Response Type	Agent / Consultant	
On behalf of:	Russell Road Edinburgh Ltd	
Choice	12 D	
Do you have a bro	ownfield site you wish us to consider in the proposed Plan? - Brow	vnfield sites upload
Short Response	Yes	
Explanation		
Choice	13 A	
	e a new policy that provides support for social enterprises, start-uo good growth for Edinburgh. Do you agree with this? - Yes / No	ups, culture and tourism, innovation and learning, and the low carbon sector, where there
Short Response	Not Answered	
Explanation	Not Answered	
Choice	14. A	
0.10.00	14 A	
We want City Pla	n 2030 to support the best use of existing public transport infrastrable growth. We will do this through 'an area of search' which allo	ructure in West Edinburgh and accommodate the development of a mix of uses to support ws a wide consideration of future uses within West Edinburgh without being tied to
We want City Pla	n 2030 to support the best use of existing public transport infrastr	
We want City Pla	n 2030 to support the best use of existing public transport infrastrable growth. We will do this through 'an area of search' which allo	
We want City Pla inclusive, sustaina individual sites. D	n 2030 to support the best use of existing public transport infrastrable growth. We will do this through 'an area of search' which allo you support this approach? - Yes / No	

<b>Customer Ref:</b>	00001 Response Ref: ANON-KU2U-GPU8-B	Supporting Info Yes
Name	Lisa Proudfoot	Email lisa.proudfoot@montagu-evans.co.uk
Response Type	Agent / Consultant	
On behalf of:	Russell Road Edinburgh Ltd	
		-
Choice	14 B	
		round site to the south of the A8 at Norton Park and allocate the site for other uses. Do
you agree with th	is approach? - Yes / No	
•	Not Answered	
Explanation	Not Answered	
Choice	14 C	
-	n 2030 to allocate the Airport's contingency runway, the "crosswin ou agree with this approach? - Yes / No	ds runway" for the development of alternative uses next to the Edinburgh Gateway
Short Response		
Siloit iveshouse	Not Answered	
Explanation	Not Answered Not Answered	
•		
Explanation	Not Answered	
Explanation Choice	Not Answered  15 A	
Explanation  Choice  We want to conti	Not Answered  15 A  nue 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 o you agree with this? - Yes / No
Explanation  Choice  We want to conti	Not Answered  15 A	
Explanation  Choice  We want to conti providing shopping	Not Answered  15 A  nue to use the national 'town centre first' approach. City Plan 2030 ag, commercial leisure, and entertainment and tourism activities. D	
Explanation  Choice  We want to conti providing shopping  Short Response	Not Answered  15 A  nue to use the national 'town centre first' approach. City Plan 2030 ag, commercial leisure, and entertainment and tourism activities. D	
Explanation  Choice  We want to conti providing shopping	Not Answered  15 A  nue to use the national 'town centre first' approach. City Plan 2030 ag, commercial leisure, and entertainment and tourism activities. D	

Customer Ref:	00001 Re	esponse Ref:	ANON-KU2U-GPU8-B	Suppor	rting Info	Yes			
Name	Lisa Proudfoot			Email	lisa.proudfo	oot@mont	agu-evans.co.	uk	
Response Type	Agent / Consultant								
On behalf of:	Russell Road Edinburg	h Ltd							
Choice	15 B								
	d leisure development v tres, small scale propos	-						•	•
Short Posnonso	Not Answered								
Short Response									
Explanation	Not Answered								
Choice	15 C								
	w our existing town and rvices in outer areas, cor		• •			-	nges where th	ney support wal	king and cycling
Short Response	Not Answered								
Explanation	Not Answered								
Choice	15 D								
balance of uses w	nue to prepare and upd rithin our centres to mai nce within the plan. Wh	intain their vita	ality, viability and deliv	er good placemaking. In		•		-	
Short Response	Not Answered								
Explanation	Not Answered								
	+								

Customer Ref:	00001 Response Ref: ANON-KU2U-GPU8-B	Supporting Info Yes
Name	Lisa Proudfoot	Email lisa.proudfoot@montagu-evans.co.uk
Response Type	Agent / Consultant	
On behalf of:	Russell Road Edinburgh Ltd	
Choice	15 E	
We want to supporthis approach? - Y		er locations with good public transport access throughout Edinburgh. Do you agree with
<b>Short Response</b>	Not Answered	
Explanation	Not Answered	
Choice	15 G	
	ek to reduce the quantity of retail floorspace within centres in favor any growing demand. Do you agree with this approach? - Yes / No	ur of alternative uses such as increased leisure provision and permit commercial centres
<b>Short Response</b>	Not Answered	
Explanation	Not Answered	
Choice	16 A1	
	nue to support office use at strategic office locations at Edinburgh   Do you agree? - Yes / No	Park/South Gyle, the International Business Gateway, Leith, the city centre, and in town
Short Response	Not Answered	
Explanation	Not Answered	

Customer Ref:	00001	Response Ref:	ANON-KU2U-GPU8-B	Supp	orting Info	Yes			
Name	Lisa Proudfoo	t		Email	lisa.proudf	oot@monta	agu-evans.co.uk		
Response Type	Agent / Consu	ultant							
On behalf of:	Russell Road	Edinburgh Ltd							
Choice	16 A2								
We want to supp	ort office devel	opment at commercia	l centres as these also provide	accessible loca	tions Yes /	No			
Short Response	Not Answered								
Explanation	Not Answered								
Choice	16 A3								
We want to stren	gthen the requ	irement within the cit	y centre to provide significant	office floorspac	e within maj	or mixed-us	se developments. Do	you agree?	' - Yes / No
<b>Short Response</b>	Not Answered								
Explanation	Not Answered								
Choice	16 A4								
We want to amer	nd the boundar	y of the Leith strategio	office location to remove are	as with resident	tial developm	nent consen	nt. Do you agree? - Ye	es / No	
Short Response	Not Answered								
Explanation	Not Answered								

<b>Customer Ref:</b>	00001	Response Ref:	ANON-KU2U-GPU8-B	Suppo	rting Info	Yes		
Name	Lisa Proudfoo	t		Email	lisa.proudf	oot@monta	agu-evans.co.uk	
Response Type	Agent / Consu	ultant						
On behalf of:	Russell Road I	Edinburgh Ltd						
Choice	16 A5							
We want to conti	nue to support	office development in	other accessible locations else	where in the u	ban area. D	o you agree	e? - Yes / No	
Short Response	Not Answered							
Explanation	Not Answered							
Choice	16 A5							
We want to conti consider in the pr		office development in	other accessible locations else	where in the u	ban area. Do	o you agree	e? - Do you have an office site	you wish us to
Short Response								
Explanation								
Choice	16 B							
h		cations within Edinbur	gh with potential for office dev	relanment Day	ou agree wi	ith this? - Va	as/No	
vvc want to ident	iny sites and lot	Cations within Ealibur	511 With potential for office dev	ciopinient. Do y	ou agree wi	11113; - 16	L3/ 110	
Short Possons	Not Anguard							
	Not Answered							
Explanation	Not Answered							

Customer Ref:	00001	Response Ref:	ANON-KU2U-GPU8-B	Supporting Info	Yes	
Name	Lisa Proudfoo	t		Email lisa.proudf	lfoot@montagu-evans.co.uk	
Response Type	Agent / Consu	ıltant				
On behalf of:	Russell Road B	Edinburgh Ltd				
Choice	16 C					
use, unless existir	ig office space i	s provided as part of	denser development. This wou	ld apply across the city to re	ne redevelopment of office buildings other than for office recognise that office locations outwith the city centre and f office' policy only in the city centre Yes / No	
Short Response	Not Answered					
Explanation	Not Answered					
Choice	16 E1					
We want to ident Support - Leith St			ss and industrial sites to provid	e necessary floorspace at th	he following locations. Do you agree? - Yes / No -	
Short Response Explanation	Not Answered					
Choice	16 E2					
We want to ident Support - Newbri		r new modern busine	ss and industrial sites to provid	e necessary floorspace at th	he following locations. Do you agree? - Yes / No -	
Short Response Explanation	Not Answered					

Customer Ref:	00001	Response Ref:	ANON-KU2U-GPU8-B	Supporting Info	Yes	
Name	Lisa Proudfoot	·			oot@montagu-evans.co.uk	
Response Type	Agent / Consult	ant			- 0	
On behalf of:	Russell Road Ed					
		-		1		
Choice	16 E3					
We want to ident Support - Newcra			s and industrial sites to provid	le necessary floorspace at th	e following locations. Do you agree? - Ye	es / No -
Short Response Explanation	Not Answered					
Choice	16 E4					
We want to ident Support - The Cro		new modern busines	s and industrial sites to provid	le necessary floorspace at th	e following locations. Do you agree? - Ye	es / No -
Short Response Explanation	Not Answered					
Choice	16 E5					
We want to ident support - Leith St			s and industrial sites to provid	le necessary floorspace at th	e following locations. Do you agree? - Ye	es / No - Do not
Short Response Explanation	Not Answered					

<b>Customer Ref:</b>	00001 R	Response Ref:	ANON-KU2U-GPU8-B	Supporting Info	Yes	
Name	Lisa Proudfoot			Email lisa.proudf	oot@montagu-evans.co.uk	
Response Type	Agent / Consultant					
On behalf of:	Russell Road Edinbur	rgh Ltd				
Choice	16 E6					
We want to identi support - Newbrid		modern busines	s and industrial sites to prov	vide necessary floorspace at th	e following locations. Do you agr	ee? - Yes / No - Do not
Short Response Explanation	Not Answered					
Choice	16 E7					
	fy proposals for new r ghall Industrial Estate		s and industrial sites to prov	vide necessary floorspace at th	e following locations. Do you agr	ee? - Yes / No - Do not
Short Response Explanation	Not Answered					
Choice	16 E8					
We want to identi support - The Cros		modern busines	s and industrial sites to prov	vide necessary floorspace at th	e following locations. Do you agr	ee? - Yes / No - Do not
Short Response	Not Answered					

Customer Ref:	00001	Response Ref:	ANON-KU2U-GPU8-B	Supporting Info Yes
Name	Lisa Proudfoot			Email lisa.proudfoot@montagu-evans.co.uk
Response Type	Agent / Consultar	nt		
On behalf of:	Russell Road Edin	burgh Ltd		
	-			
Choice	16 EX			
We want to ident	ify proposals for ne	w modern busines	ss and industrial sites to provid	e necessary floorspace at the following locations. Do you agree? - Explain why
Short Response	Not answered			
Explanation				
Choice	16 F			
amount expected	l to be re-provided,	clearer criteria on	what constitutes flexible busi	rban sites and considered in Place Briefs for greenfield sites. We want to set out the ness space, and how to deliver it, including the location on-site, and considering
amount expected	-	clearer criteria on	what constitutes flexible busi	
amount expected adjacent uses, se	I to be re-provided, rvicing and visibility	clearer criteria on	what constitutes flexible busi	
amount expected adjacent uses, se	l to be re-provided,	clearer criteria on	what constitutes flexible busi	
amount expected adjacent uses, se	I to be re-provided, rvicing and visibility	clearer criteria on	what constitutes flexible busi	
amount expected adjacent uses, se Short Response Explanation	I to be re-provided, rvicing and visibility Not Answered	clearer criteria on	what constitutes flexible busi	
amount expected adjacent uses, se Short Response Explanation	I to be re-provided, rvicing and visibility  Not Answered  16 G	clearer criteria on . Do you agree? - \	what constitutes flexible busi Yes / No	ness space, and how to deliver it, including the location on-site, and considering
amount expected adjacent uses, se Short Response Explanation	I to be re-provided, rvicing and visibility  Not Answered  16 G	clearer criteria on . Do you agree? - \	what constitutes flexible busi Yes / No	
amount expected adjacent uses, se Short Response Explanation Choice We want to conti	Not Answered  16 G  nue to protect indu	clearer criteria on . Do you agree? - \	what constitutes flexible busi Yes / No	ness space, and how to deliver it, including the location on-site, and considering
amount expected adjacent uses, se Short Response Explanation  Choice  We want to conti	Not Answered  16 G  nue to protect indu	clearer criteria on . Do you agree? - \	what constitutes flexible busi Yes / No	ness space, and how to deliver it, including the location on-site, and considering
amount expected adjacent uses, se Short Response Explanation Choice We want to conti	Not Answered  16 G  nue to protect indu	clearer criteria on . Do you agree? - \	what constitutes flexible busi Yes / No	ness space, and how to deliver it, including the location on-site, and considering
amount expected adjacent uses, se Short Response Explanation Choice We want to conti	Not Answered  16 G  nue to protect indu	clearer criteria on . Do you agree? - \	what constitutes flexible busi Yes / No	ness space, and how to deliver it, including the location on-site, and considering

Customer Ref:	00001 Response Ref: ANON-KU2U-GPU8-B	Supporting Info Yes
Name	Lisa Proudfoot	Email lisa.proudfoot@montagu-evans.co.uk
Response Type	Agent / Consultant	
On behalf of:	Russell Road Edinburgh Ltd	

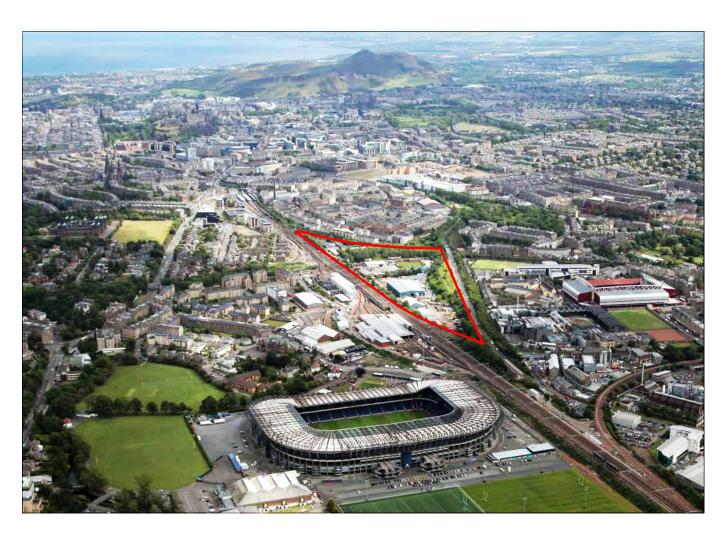
Choice 16 H

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

Short Response Not Answered

## 7N Architects

Russell Road, Edinburgh - Choices For City Plan 2030 27.04.2020



This report has been prepared for Russell Road Edinburgh Ltd to present the potential of their landholding to the west of Russell Road to form an important component of the regeneration of the wider site and the surrounding area of the city.

The area has historically been hemmed in by railway infrastructure and relatively cut off from the rest of the city. Recent public transport and movement initiatives have helped to open up the area. The site is now much closer to the major transport hub at Haymarket for pedestrains and cyclists than many people realise and there are opportunities for improved connections to the neighbouring local centres at Roseburn and Gorgie.

It is now time to look at this site differently and consider the potential for it to play a greater role in meeting the developing needs of the city.

This report forms part of their reponse to the Choices for City Plan 2030 consultation and should be read in conjunction with the documents submitted by Montagu Evans.



# The Sites Today



The sites are bounded by the Edinburgh to Glasgow railway line to the north, the elevated Western Approach Road to the South and Russell Road to the east.

Russell Road is abutted by industrial units on one side and a steep wooded embankment on the other, forming an inactive frontage which contributes nothing to the street.

The elevated West Approach Road is on a raised embankment and has no buildings addressing it. It is a relic of past thinking about transport within the city.

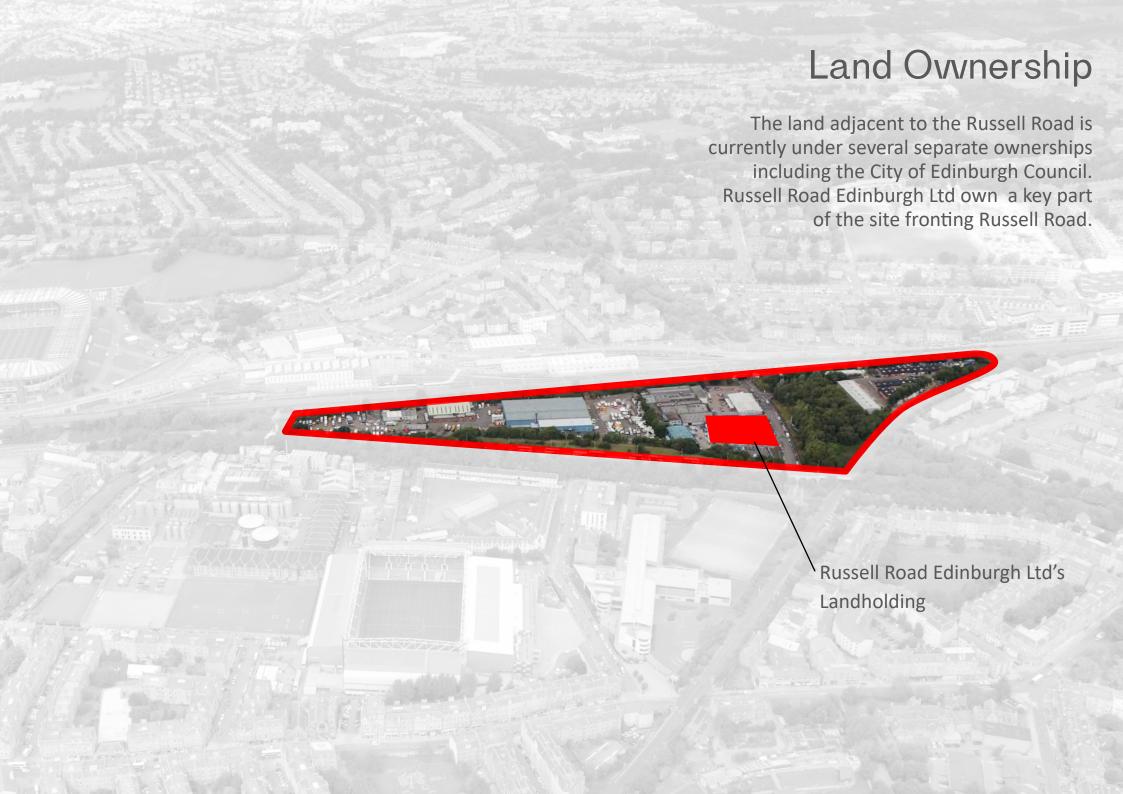


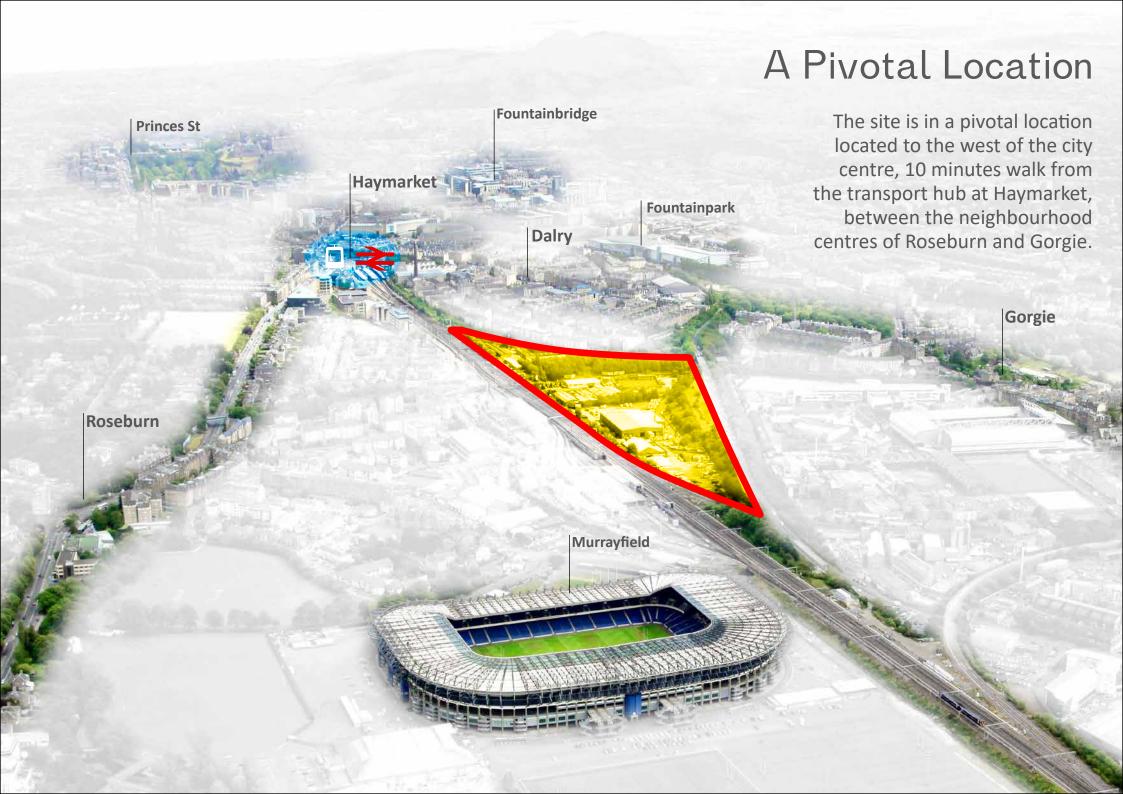
Views along Russell Road

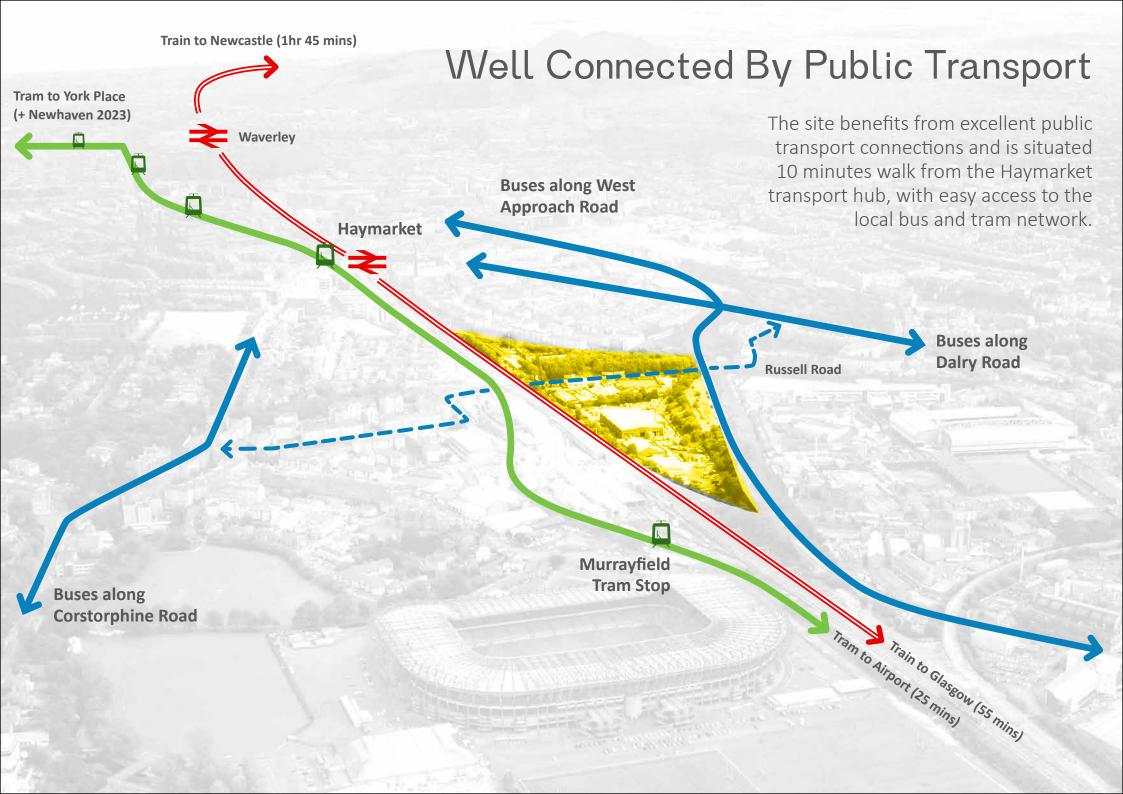


View along West Approach Road

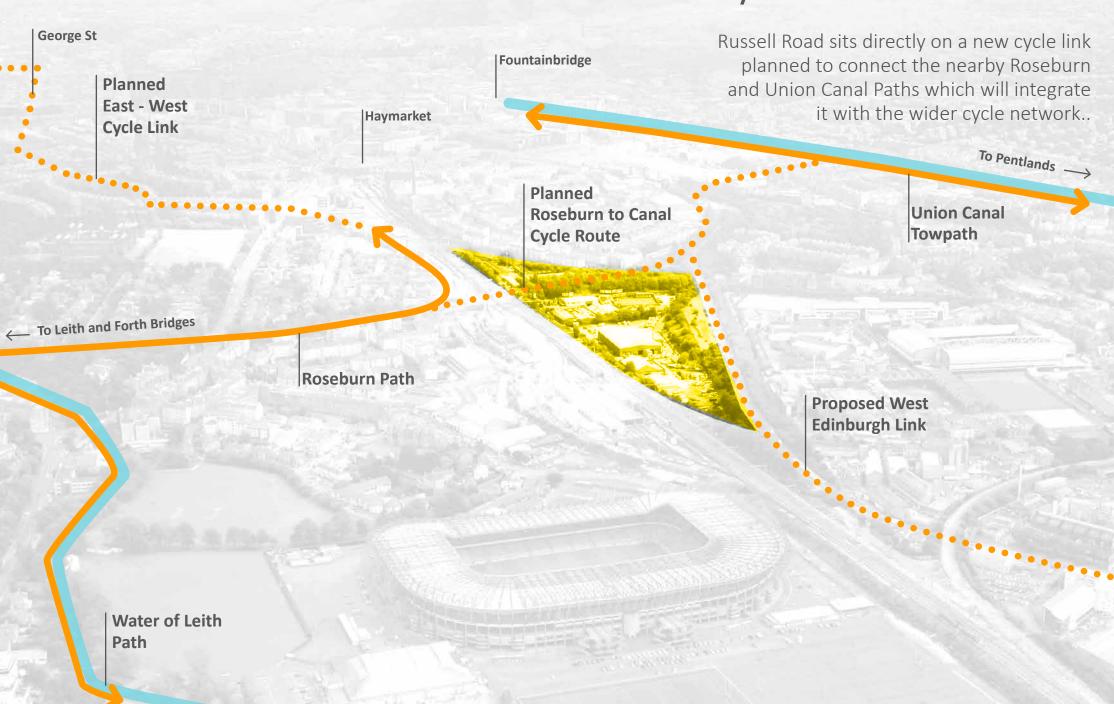


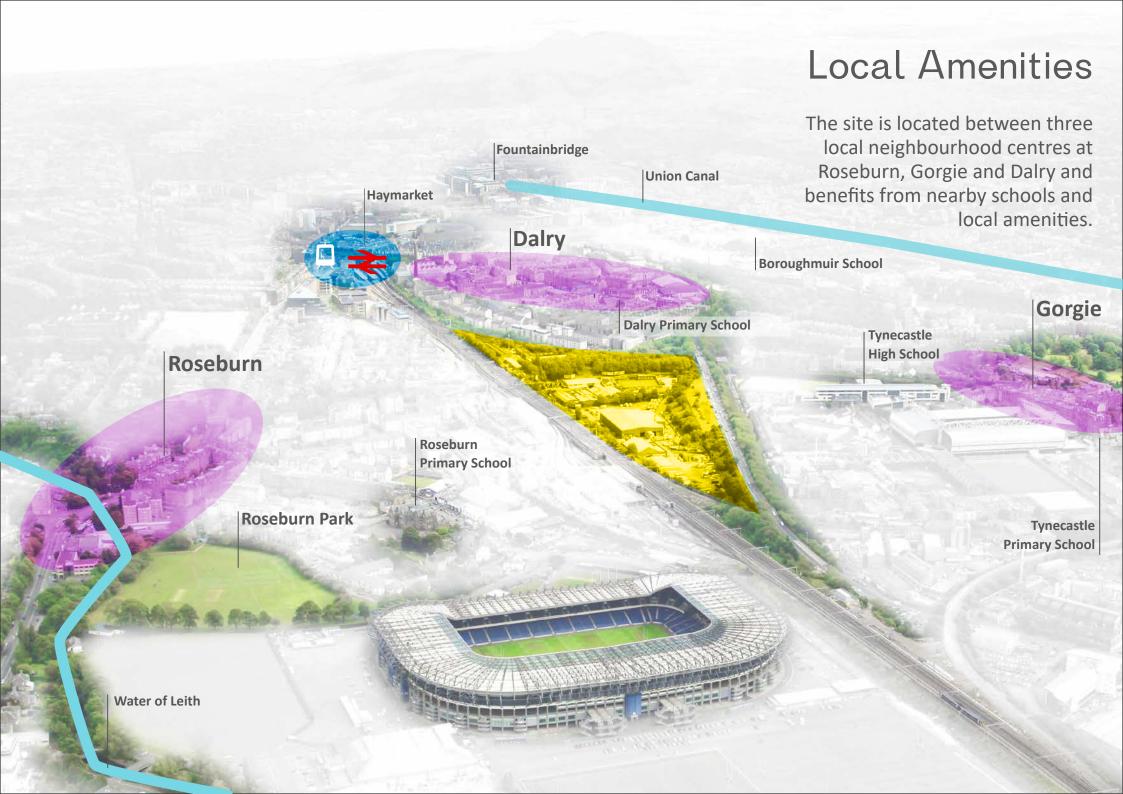


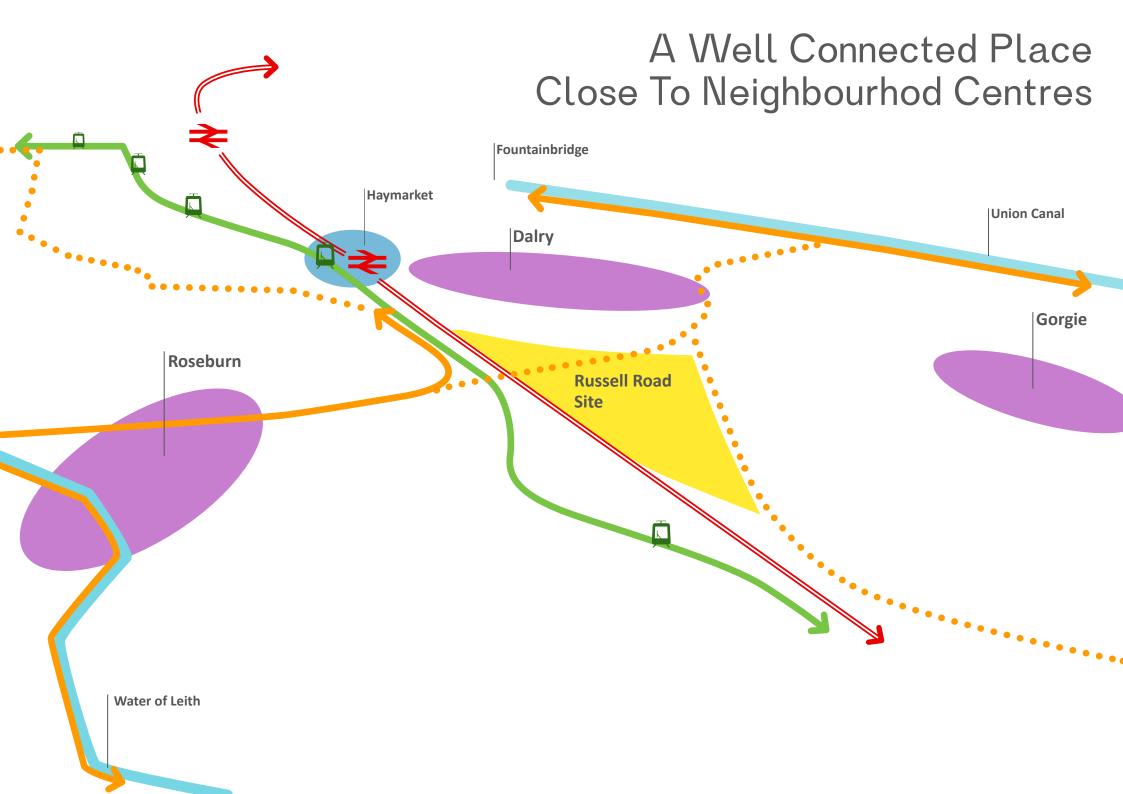




# On The Cycle Route Network











# Western Approach Road

What if the West Approach Road became a street, not just a highway?



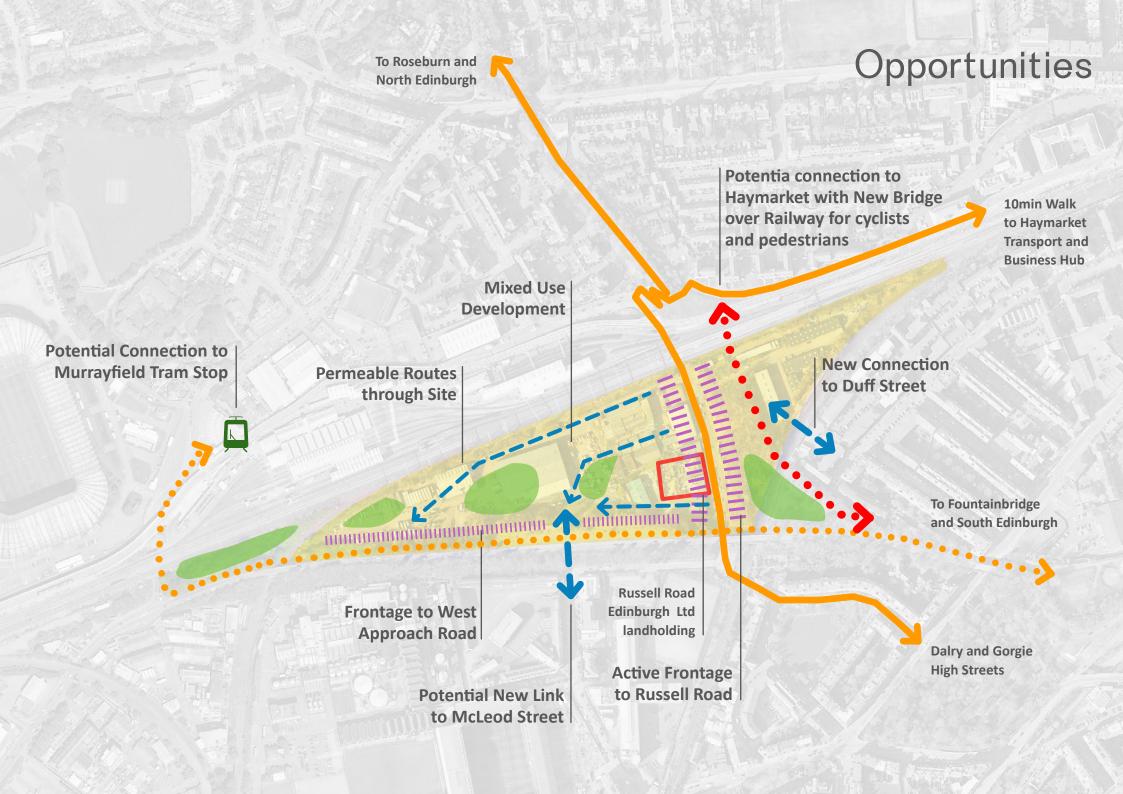
# Potential For Mixed Uses

What if the current industrial area became a mixed use development to meet Edinburgh's acute housing needs whilst maintaining employment in the area?







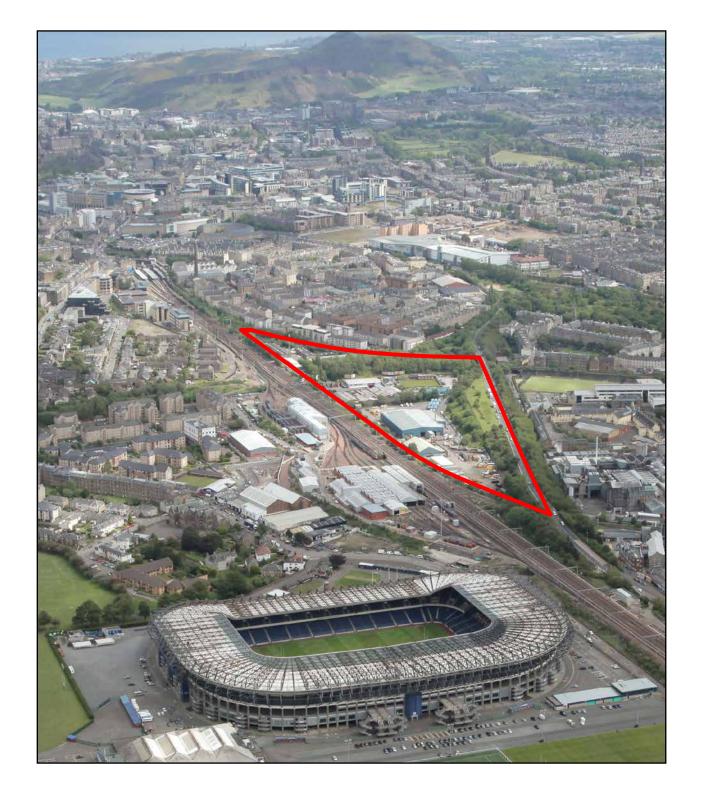


# Summary

This area is now a different place to the times when the Western Approach Road was constructed and the site was seen as a hemmed in backwater.

New public transport and movement initiatives have helped to open up the area and this can be enhanced further with new links to the rapidly developing transport and business hub at Haymarket and the tram stop at Murrayfield.

The ideas in this report are intended to highlight the opportunities that these sites present in order to stimulate discussions on how they can play a greater role in meeting the developing needs of the city.



# **CHOICES FOR CITYPLAN 2030**



# SITE

Russell Road, Edinburgh

# **CLIENT**

Urban High Investments / Ardent Group

# **COMPLETED BY**

Craig Wallace / Lisa Proudfoot

# **DATE**

30 April 2020

# **SUBJECT**

Russell Road - Choices for CityPlan 2030 Main Issues Report Representation

#### INTRODUCTION

Montagu Evans LLP act on behalf of Urban High Investments and Ardent Group, operating as Russell Road Edinburgh Ltd, in relation to their landholding at Russell Road, Edinburgh.

Ardent strongly believe in the opportunity presented by the Russell Road site, and this is why they have joined forces with Urban High Investments to acquire the site with a view to maximising its potential, and ideally in conjunction with surrounding landowners. Urban High have a strong track record in delivering complex mixed use development projects across the UK, and have extensive financial backing to deliver projects in isolation, as well as in joint venture and lead investor / developer roles with other land interests. Ardent Group is the trading name for a property and leisure group. They have completed a variety of mixed use, residential, commercial and leisure projects throughout the UK and Ireland. The group own and operate businesses in the same area of the city so are very keen to see this area transformed to the benefit of all

The site is in a prime position, being one of the last key brownfield opportunities in close proximity to the city centre, and with the changing nature of elements of the surrounding environment and land uses, presents an opportunity to look at the wider site. The current configuration and mix of uses on the site can be viewed as a missed opportunity in terms of the connectivity between Roseburn and Gorgie / Dalry, and the opportunity to introduce more active uses could significantly improve the quality of environment, connectivity and safety and security of pedestrian and cycle routes through the area.

Please see attached accompanying plans and supporting information which sets out the extent of our Clients' interests and how this relates to the neighbouring uses and wider potential of the site.

## **CHOICES FOR CITYPLAN 2030**

The City of Edinburgh Council (CEC) have started the process of reviewing the current Edinburgh Local Development Plan (LDP), which was adopted by the Council in November 2016. The first stage of the review is the production of a Main Issues Report (MIR). 'Choices for City Plan 2030' was published by the Council on 31 January 2020. The MIR sets out the Council's broad aspiration's that by 2030 Edinburgh will be:-

- 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 they can afford; and
- A city where everyone shares in its economic success".

These aspirations are supported by 16 proposed policy changes.

Comments are made on behalf of our Client's interest at Russell Road, however these feed into the longer term aspirations for the wider site.

#### THE SITE

The proposed site comprises an area that was formerly a bow ling green and is now a builder's office, store and yard. The site is well located on the western side of Edinburgh City centre, and is between two principal arterial routes of Corstorphine Road and Dalry Road with excellent public transport, walking and cycling links to the city centre and west to University campuses.

#### **ASPIRATIONS**

The site presents an opportunity to bring forward regeneration of the wider area through a combined and coordinated vision to maximise value and regeneration benefits to this area of the city. The subject site presents an opportunity for student accommodation development.

The site and its surrounds are currently characterised by a mix of industrial and trade uses. Circumstances are changing in relation to a number of these ownerships, which is positive in the context of a potential approach to bring forward a coordinated redevelopment of the wider site.

CEC have a large scale landholding to the west of the wider site, historically used as a cleansing department depot and vehicle servicing area – these uses are in the process of being transferred to new modern depot facilities at Sighthill and Seafield. CEC are currently progressing plans to locate a City Archive Facility as part of the redevelopment of the site – this would include warehousing for the archive as well as visitor and interpretative facilities for public and educational use.

The site is also bounded by a number of other industrial and employment uses.

Within the wider area this review of the LDP and current circumstances and timings of landowners presents a situation that is wholly conducive to examining options for wider scale regeneration and change of this site and to the benefit of all parties.

The proposed site, promoting a student development set within the wider context, would act as an anchor to kick start the wider regeneration vision of this well located brownfield site, and in meeting the developing needs of the city.

Early discussions have taken place with all land interests and are progressing with a view to fully understanding the full potential of the site, and how a coordinated approach to redevelopment and reconfiguration of some, if not all of the site could provide a positive change to existing operations, future potential and the wider benefits of the site as a whole in the context of the surrounding area.

At this stage it is premature to provide definitive information on the current status of these discussions, however it is appropriate to highlight the appetite for ongoing dialogue and to fully understand how the area could change in the context of specific proposals and future potential within this area.

# **REPRESENTATION**

Our client considers that the following choices are most relevant to them and that if implemented could have the greatest impact to delivering redevelopment of the proposed site. There are of course also great synergies between what is being proposed by the new LDP and our client's own aspirations.

### CHOICE 1 - MAKING EDINBURGH A SUSTAINABLE, ACTIVE AND CONNECTED CITY

Choice 1 states that the Council want to create a new policy which will help connect places, parks and greenspaces together as part of a multi-functional, local, city-wide, regional, and national green network. In order to increase health and wellbeing, encourage more walking, cycling and sport, address climate change, have a positive impact on biodiversity and air quality, manage the water environment and create opportunities for food growing, new development will need to ensure it connects to and delivers this network, including connections to the wider regional green network.

CEC want to introduce a new 'extra-large green space standard' which recognises the need for new communities to have access to green spaces more than 5 hectares, as well as smaller greenspaces (a 5-hectare green space is the equivalent of The Meadows or Saughton Park). At present policies require new development areas to provide a park of 2 hectares; CEC want to increase this requirement.

The subject site lies in close proximity to the existing greenspaces of Murieston Crescent and Roseburn Park. The site is in a pivotal location with opportunity to better connect the neighbourhood centres of Roseburn and Gorgie. The aspirations for the site provide an opportunity to link into the proposed Roseburn / Fountainbridge green network linkage, with the Russell Road site sitting directly on a new cycle link planned to connect the nearby Roseburn and Union Canal Paths which will integrate it with the wider cycle network.

#### CHOICE 2 - IMPROVING, THE QUALITY, DENSITY AND ACCESSIBILITY OF DEVELOPMENT

Choice 2 states that the Council may revise their approach to development density in City Plan 2030 to ensure that the limited space available to develop in Edinburgh is used as efficiently as possible, with the under-development of sites avoided.

Our clients are supportive of this choice but would suggest that increasing the density of all development relative to a proposals surroundings would be a more positive step to ensuring that the scarce number of development sites in Edinburgh's urban areas are maximised and support the efficient use of land. The Russell Road site could maximise its benefits of being close to public transport services and being situated amongst high-quality active travel routes.

Choice 2 also states that the Council want to revise their design and layout policies to achieve better layouts for active travel and connectivity. Our client would agree that places need to follow the six qualities of successful places in Scottish Planning Policy in that they are safe and pleasant, easy to move around, are welcoming; adaptable, and are resource efficient. The proposed site could easily and effectively link into existing active travel routes providing good connectivity into the rest of the City.

Choice 2 may also introduce a requirement for all development, including student accommodation, to deliver quality open space and public realm that is useable for a "range of activities, including drying space, whilst allowing for higher densities". Our clients would agree that quality open space and public realm can enrich an urban environment and would encourage the Council to support innovative approaches to delivering open space and public realm as part of a higher density development where available space may be constrained. It is considered that requirements should be applied on a case-by-case qualitative approach to assessing open space and public realm provision as part of a high density development, taking into account factors such as the surrounding area of a particular site, existing amenity spaces in proximity to a development site, and the expected end users of a development.

# CHOICE 5 - DELIVERING COMMUNITY INFRASTRUCTURE

CEC 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 (deliverable within the plan period), encouraging improvements and investment in the services on offer.

The subject site and wider area are conveniently located within existing infrastructure, including education, healthcare and sustainable transport connections.

# CHOICE 6 - CREATING PLACES THAT FOCUS ON PEOPLE, NOT CARS

CEC want City Plan 2030 to ensure the creation of places that focus on people not cars and prioritise public transport, walking and cycling to encourage active and healthy lives. To do this, all development must be well served by existing or planned new public transport, walking and cycling infrastructure. Choice 6 outlines CEC's intentions 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.

The subject site at Russell Road can contribute and take strength from its existing connections for public transport usage, walking and cycling.

## CHOICE 7 - SUPPORTING THE REDUCTION IN CAR USE IN EDINBURGH

CEC 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.

Again the subject site at Russell Road can contribute and take strength from its existing connections for public transport usage, walking and cycling.

## CHOICE 8 - DELIVERING NEW WALKING AND CYCLING ROUTES

CEC want to update their policy on the Cycle and Footpath Network to provide criteria for identifying new routes. As part of the City Centre Transformation and other Council and partner projects to improve strategic walking and cycling links around the city, CEC want to add routes (along with existing safeguards) to the network as active travel proposals for the new plan to assist in delivering a range of new links.

The subject site, and wider area, through change of use and reconfiguration could directly benefit from the establishment of the Roseburn to Union Canal and West Edinburgh Link as part of the wider vision for the area, and further consideration of specific opportunities to provide direct and indirect linkages to both will require to be explored. The Russell Road site currently sits directly on a new cycle link planned to connect the nearby Roseburn and Union Canal Paths which will integrate it with the wider cycle network.

#### CHOICE 10 - CREATING SUSTAINABLE COMMUNITIES

Choice 10 proposes that a new policy on purpose-built student accommodation (PBSA) may be introduced in City Plan 2030. This policy may require all new PBSA to be located on a direct route to a university or college and that it is built for and managed by a university or college. The policy may limit the total number of studios in a PBSA scheme to a maximum of 10% of the total number of bed spaces and require that market and affordable housing is also delivered as part of the overall development.

Our clients would be concerned in relation to the proposed policy option that may require all future PBSA in Edinburgh to be built for and managed by a university or college in the city. If the Council choose to implement this, there is a risk that the policy option could create a monopoly over PBSA in the city, which could reduce competition between operators, adversely impacting on pricing, and diverting future investment away from Edinburgh.

In terms of where PBSA should be located, our clients agree with the Council's current approach under 'Policy Hou 8 Student Accommodation' that PBSA should be granted when it is appropriately located in terms of access to a university or college by walking, cycling or public transport. Good connectivity is an important factor in reducing the need for students to travel, enhancing student satisfaction and working towards improving environmental sustainability.

It is widely recognised that a variety of formats of student accommodation is important in providing a range and choice of accommodation to meet the wide ranging demands and preferences of all students. We would submit that it is inappropriate for the Council to single out one form of student accommodation product, without any evidence to support the approach. We would question how the Council have derived the maximum figure of 10% studio flats proposed and how this should be enforced if it can be demonstrated by developers / operators that there is existing market demand for these types of residences from students.

In addition, the proposed restriction on the number of studios fails to acknowledge the importance of studio style living in terms of future proofing. Studios are suitable for conversion to Build to Rent and co-living as an example, both of which are likely to play an important role in the city's future housing mix.

As part of Choice 10, CEC 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. On sites over 0.25 hectares coming forward for student housing, hotels and

short-stay commercial visitor accommodation, and other commercial business, retail and leisure developments, at least 50% of the site should be provided for housing. The new policy would not apply to land specifically allocated or designated within the plan for a specific use.

The focus of any PBSA policy approach should be on the acceptability of the use in principle. The intention with such an approach would be to allow a balanced view of all relevant factors of importance to determining the suitability of a proposal, and also allow for changing circumstances throughout the lifetime of the plan to be reflected in the application of this balanced assessment. There would be concern with sites which just meet the 0.25 hectares who are immediately required to provide 50% of the site for housing.

## CHOICE 11 - DELIVERING MORE AFFORDABLE HOMES

CEC want to amend their policy to increase the provision of affordable housing requirement from 25% to 35%. All development, including conversions, which consist of 12 residential units or more must include provision for affordable housing amounting to 35% of the total units. This policy will also apply to all land coming forward for other uses (as set out in Choice 10) i.e. where a site is required to deliver at least 50% housing, at least 35% of this housing must also be affordable. CEC wish City Plan 2030 to require a mix of housing types and tenures.

There is concern over the increasing of this affordable housing requirement in viability terms, particularly when applied to all land coming forward for other uses (as set out in Choice 10). If it is to be implemented wew ould encourage greater flexibility around tenure and models / definitions of affordable housing product.

#### CHOICE 12 - BUILDING OUR NEW HOMES AND INFRASTRUCTURE

Choice 12 provides three options on how and where City Plan 2030 will deliver new homes; delivery by the council and its partners within the Urban Area, delivery though market housing by releasing Greenfield land, or a blended approach. CECs preference is for new homes to be delivered by the Council and its partners within the Urban Area.

Our clients would agree with this approach. The Urban Area contains many brownfield sites which are primed for redevelopment, particularly for residential development and including student accommodation. The Russell Road site is in a pivotal location located to the west of the city centre, 10 minutes' walk from the transport hub of Haymarket, and situated between the neighbourhood centres of Roseburn and Gorgie. There is an opportunity to better link this site into the city using and improving existing connections, as part of CEC Choices for the new LDP. Aspirations for the wider area could include residential led-development with active frontages.

### CHOICE 16 - DELIVERING OFFICE, BUSINESS AND INDUSTRY FLOORSPACE

CEC want to ensure new business space is provided as part of the redevelopment of urban sites. They further state that business estates across the city often serve a local catchment of residents and other businesses. To retain these within the communities they serve, we will require replacement floorspace is re-provided on-site. CEC want to set out the amount expected to be re-provided and include 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.

## **SUMMARY**

Our clients support a range of the principles suggested as part of the Choices for CityPlan 2030 paper, however we have made comments above as to the technical details of these where they have the potential to affect redevelopment aspirations of the subject site and the vision for the wider surrounding area.

It is considered that the subject site, as well as the wider area, is suitable for residential led development, including student accommodation, and can help to meet a number of the Council's objectives as highlighted throughout the Choices paper. The redevelopment of this key site will allow for existing active travel connections and green linkages to be strengthened, and for local amenities and neighbourhood centres to be better connected.

The overarching themes of the Choices for CityPlan 2030 consultation including sustainability, housing, reducing car use in the city and promoting active travel and wellbeing are all attributes that can be incorporated effectively into a masterplan strategy at the subject site.

We trust that the above and attached will be given due regard in the process of preparing the new City Plan 2030. We would be grateful to be kept advised of future opportunities to engage in the process and would be pleased to meet with the Council to further discuss matters as required. As and when further information is available in relation to the ongoing dialogue with parties on the wider site our Clients will ensure that CEC are kept informed through the appropriate channels.