

Customer Ref: 01719 Response Ref: ANON-KU2U-GWV8-K
Name: Lesley McGrath
Response Type: Agent / Consultant
On behalf of: The Royal London Mutual Insurance Society Ltd

Supporting Info: Yes
Email: lesley.mcgrath@holderplanning.co.uk

Choice 1 A

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

Short Response: Not Answered

Explanation: Not Answered

Choice 1 B

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

Short Response: Not Answered

Explanation: Not Answered

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Choice **1 C**

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

Short Response

Explanation

Choice **1 D**

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

Short Response

Explanation

Choice **1 E**

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

Short Response

Explanation

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Choice **1 F**

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

Short Response

Explanation

Choice **1 F**

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

Short Response

Explanation

Choice **1 G**

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

Short Response

Explanation

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Choice **1 H**

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

Short Response

Explanation

Choice **2 A**

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

Short Response

Explanation

Choice **2 B**

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

Short Response

Explanation

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Choice **2 C**

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

Short Response

Explanation

Choice **2 D**

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

Short Response

Explanation

Choice **3 A**

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

Short Response

Explanation

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Choice **4 A**

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

Short Response

Explanation

Choice **4 B**

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

Short Response

Explanation

Choice **5 A**

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

Short Response

Explanation

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Choice **5 B**

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

Short Response

Explanation

Choice **5 C**

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

Short Response

Explanation

Choice **5 D1**

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

Short Response

Explanation

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Choice **5 D2**

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

Short Response

Explanation

Choice **5 E**

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

Short Response

Explanation

Choice **6 A**

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

Short Response

Explanation

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Choice **6 B**

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

Short Response

Explanation

Choice **7 A**

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

Short Response

Explanation

Choice **7 B**

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

Short Response

Explanation

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Choice **7 C**

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

Short Response

Explanation

Choice **7 D**

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

Short Response

Explanation

Choice **8 A**

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

Short Response

Explanation

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Choice **8 B**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

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Choice **9 A**

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

Short Response

Explanation

Choice **9 B**

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

Short Response

Explanation

Choice **10 A**

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

Short Response

Explanation

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Choice **10 B**

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

Short Response

Explanation Whilst it is recognised that the Council wishes to maximise opportunities for residential development, the proposed policy does not take into account the nature of the development which is primarily sought, for example an employment use and the requirements of that land use; the sites' physical ability to accommodate both the intended land use which requires planning permission and residential development; amenity considerations which may restrict development or require the implementation of significant mitigation measures; the financial impact of developer contributions; or an applicant's ability to implement the residential element of any proposal.

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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 Changes in retail patterns have impacted on the demand for retail facilities and vacancy rates have increased. It is anticipated that the preferred policy is put forward within this context and the consideration of alternative land use proposals is welcomed but needs to be broadened to include other land use proposals. The preferred policy specifically supports 'redevelopment for mixed use including housing.' Whilst housing may be an appropriate in some cases, it will not be appropriate in all circumstances. Consideration needs to be given to a site's physical ability to accommodate residential development and associated requirements e.g. open space provision; neighbouring uses and amenity considerations, which may restrict development or require the implementation of significant mitigation measures which make development unviable; the financial impact of developer contributions; or an applicant's ability to implement the residential element of any proposal; or potential to accommodate other alternative uses. Stand-alone retail units and commercial centres located within or adjacent to employment areas can offer the potential to accommodate identified demand for employment uses, as referred to in the Edinburgh City Plan 2030 Commercial Needs Study: Industrial Property Market including, "urban services and trades as these are gradually displaced from - or in some cases re-accommodated at improved - older inner urban sites; purpose-built, quasi-retail units linked to e-commerce and smaller urban logistics in well-located, accessible clusters; and larger sites and units for modernising industry / clean urban manufacturing and urban logistics." The preferred policy needs to be broadened to support redevelopment of stand-alone out of centre retail units and commercial centres for a range of uses including employment use, where such a use would not impact on the established amenity of the surrounding area.

Choice **11 A**

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

Short Response

Explanation

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Choice 11 B

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

Short Response Not Answered

Explanation Not Answered

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Choice 12 A

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

Short Response: Not Answered

Explanation

None of the options are supported by this Representation. ROYAL LONDON MUTUAL INSURANCE SOCIETY LTD, LAND HOLDING AT SEAFIELD ROAD/SEAFIELD WAY Options 1 and 3 identify land comprising an industrial estate and retail premises at Seafield Way as locations for “urban area housing led mixed use.” The area is defined in the Council’s Housing Study January 2020, Part 2a Urban Area Site Assessment as ‘227 Seafield Road’ and/or 383 ‘Seafield.’ The owner, Royal London Mutual Insurance Society Ltd (Royal London) has no intention of releasing the land for housing use over the Plan period and their land holding should not be considered for residential or urban area housing led mixed use. Royal London have not been approached by the Council prior to identifying the land for consideration for residential or housing led mixed use. The identification of their land holding for this purpose is considered to be inappropriate. The estate has been under Royal London’s ownership for in excess of 25 years and performs a long-term strategic function being one of the larger complete industrial holdings within their property fund. Significant capital investment has been deployed over recent years including acquisition of adjacent holdings, replacement roofs, cladding renewal, unit subdivision and road/service yard replacement ensuring the accommodation is fit for modern requirements. The estate is 100% let and occupied with a 100% tenant retention rate over the past 24 months. The estate has existing tenant leases in place until August 2035. DESCRIPTION, LOCATION AND ACCESS Royal London’s land holding comprises an industrial estate with 18 units which accommodate a range of Class 4, 5 and 6 users and one unit, presently in Class 1 use and occupied by the retailer, Matalan. The premises range in floor area from 466 sq m to 4,476 sq m and are fully let and occupied. Tenants undertake a range of business operations comprising urban industry, trades, distribution and local services which support their local market, of which a significant proportion comprises the established urban area of north east Edinburgh. The landholding is situated in a location well suited for employment use within the City’s established urban area. It is accessible by foot, cycle and vehicle. Proximity to the rail line which terminates in the Port of Leith to the west should also be noted. Vehicular access to the site is via Seafield Road (A1) to the north, which is one of the City’s main road arteries and allows the site to be easily accessed by both suppliers and customers. It is notable that the Council’s Commercial Needs Study: Industrial Property Market 2018 (p21), identifies that demand for industrial floor space is increasingly directed towards strategic locations with good transportation links on the edge of urban Edinburgh, including Seafield. The surrounding land uses underline the area’s employment use character, comprising a collection of car sales garages, industrial premises and the Seafield sewage works located to north of Seafield Road, the Seafield Community Recycling Centre at Fillyside Road and a railway line lie to the south and mix of employment uses to the east and west. RELEVANT NATIONAL PLANNING POLICY Scottish Planning Policy, sets out national policy for ‘supporting business and employment’ and Development Planning must support the delivery requirements of the NPF and Policy Principles (paragraphs 92:108) Paragraph 92 sets out the current NPF context for business and employment use and states, “Planning should address the development requirements of businesses and enable key opportunities for investment to be realised. It can support sustainable economic growth by providing a positive policy context for development that delivers economic benefits.” The Policy Principles are set out at paragraph 93 and state that the planning system should, “allocate sites that meet the diverse needs of the different sectors and sizes of business which are important to the plan area in a way which is flexible enough to accommodate changing circumstances and allow the realisation of new

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opportunities.”Development Plans should align with relevant local economic strategies (paragraph 94) and as set out at paragraph 101,“Local development plans should allocate a range of sites for business, taking account of current market demand; location, size, quality and infrastructure requirements; whether sites are serviced or serviceable within five years; the potential for a mix of uses; their accessibility to transport networks by walking, cycling and public transport and their integration with and access to existing transport networks. The allocation of such sites should be informed by relevant economic strategies and business land audits in respect of land use classes 4, 5 and 6.” As noted above Royal London’s landholding supports a range of business and employment uses which broadly service the established market area of north east Edinburgh. The land holding is accessible by a range of modes of transport. The nature and form of the premises allows for the changing requirements of occupiers to be accommodated – these are flexible spaces which can accommodate, processes (either Class 4 or Class 5), storage or distribution (Class 6) with ancillary office accommodation and can serve both business and the public. PLANNING ADVICE NOTE 2/2010 AFFORDABLE HOUSING AND HOUSING LAND AUDITSSection 2 of the PAN sets out advice on Housing Land Audits and it is appropriate to consider Royal London’s land holding within its context. Paragraph 51 sets out the ‘methodology and contents’ of a housing land audit. It sets out the land to be identified within the audit which includes, “other land with agreed residential potential, such as land identified for housing in proposed LDPs or assessed as appropriate for housing following an urban capacity study.”The Council’s Housing Study January 2020, Part 2a Urban Area Site Assessment, constitutes the urban capacity study. However Royal London do not agree to the redevelopment of their land holding for residential development and do not support the identification of the land for residential or urban area housing led mixed use in the forthcoming proposed Plan. At no time have the Council ever approached Royal London in relation to the release of their land for residential use.Paragraphs 52 to 58 consider ‘effective land supply’ and provide advice on distinguishing between unconstrained sites and those which are affected by constraints which cannot be overcome in time to contribute to the housing land requirement. To assess a site or proportion of a site as being effective within the 5 year period of the housing land audit it must be free from a number of identified constraints. This assessment is also useful in demonstrating whether a site is likely to come forward over the duration of the forthcoming Plan to 2032. •Ownership – Royal London have no intention of releasing the land for residential development within the period to 2032; •Physical – Royal London have no intention of making physical alterations to the site to support residential development; •Contamination – An assessment of the site has not been made in relation to residential development; •Deficit Funding – There is no evidence available that public funding would be made available to redevelop the site; •Marketability – The site is not being marketed for residential development and continues to be utilised for employment use. The premises are occupied with lease expiration beyond the period to 2032; •Land use – The site is in employment and retail use and Royal London have no intention for utilising the land for residential development and it is not being marketed for such a use. The site does not present a realistic option for residential development.CITY PLAN 2030 – MONITORING STATEMENT The Monitoring Statement (pp 91:100) sets out the key findings of the Industrial Land Supply and Demand Report and observes that: •There has been a fall in industrial supply; •Falling supply may be constraining demand; •There is a very low vacancy rate; and Policy Emp 9 which applies to employment sites in the urban area not covered by Emp 8, has not succeeded in adequately providing adequate floor space for employment use where such use has been lost due to other forms of development. Given the findings of the Monitoring Report, proposals which support the development of the land at Seafield for residential or urban area housing led mixed use would further constrain supply and demand. Rather it is appropriate that Royal London’s landholding is identified in the forthcoming proposed Plan for employment use (Emp 8).ECONOMIC STRATEGY, ENABLING GOOD GROWTH, 2018The Economic Strategy identifies the need for a ‘new approach’ to the City’s economic development. It seeks to tackle low income, low pay and spatial inequality (pp 10:11) and the Strategy identifies wards surrounding the Seafield area as having poverty rates between 20% and 29% (Leith, Criagintinny/ Duddingston and Portobello/Craigmillar). The removal of an established employment area against a backdrop of limited industrial supply and constrained demand will only serve to exacerbate

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poverty rates in the local area. The Strategy also seeks to maintain prosperity in a slow growth economy (p12) and recognises that, “Development of new, flexible workspace is a critical issue for the city. This is particularly the case for emerging growth companies in new sectors whose needs do not fit easily into traditional property models.” Royal London’s land holding provides flexible space, which is occupied by a range of users and responds directly to the Economic Strategy. As part of ‘managing a growing city’ (p13) the Economic Strategy recognises that, “growth places a demand on the city to continue to provide good quality housing and jobs for an expanding population.” Royal London’s land holding provides premises for employment and economic growth. THE EDINBURGH CITY PLAN 2030 COMMERCIAL NEEDS STUDY: INDUSTRIAL PROPERTY MARKET, NOVEMBER 2018 The Study makes a number of observations which underline that the identification of Royal London’s landholding for residential or urban area housing led mixed use is inappropriate. These observations are listed below with Royal London’s response. The Study identifies a vacancy rate of 4.9% (2018), noting, that available supply and take-up of industrial property have declined, potentially indicating that this low supply is constraining market demand (page 1). Response: This statement marries with the observations set out in the Monitoring Report and affirms the need to ensure the land holding is identified for employment use; The Study makes observations in relation to the redevelopment of established employment sites for alternative uses, cautioning that many inner urban occupiers service the needs of the city’s residents and businesses (page 38). Response: Occupiers of urban premises are being displaced as a result of alternative uses and the ongoing need for employment premises in urban locations therefore remain essential; The Study observes further inner urban industrial property will be lost, particularly in the north-east quadrant of the city and the waterfront (page 29) and that all completed and proposed [industrial] new developments are located on Edinburgh’s accessible western edge (page 40). Response: It is notable that new development is not coming forward in the east of the City, where employment land has been lost (Monitoring Report, page 101). The City requires to both replace and modernise its industrial stock (pp 43:44) to accommodate requirements with the need for refurbishment identified. Response: Royal London have undertaken significant investment in their land holding at Seafield ensuring that it responds to occupier requirement and this responds directly to the Study’s observations. The Study concludes that there are two related industrial property market priorities for Edinburgh’s City Plan 2030 based upon the research presented in the report. The first priority is to, “Accommodate the modernisation and potentially the migration of urban industry within Edinburgh. The total scale and mix of in-situ refurbishment versus new-build in alternative locations will depend upon the scenario adopted. The focus for this market priority is upon understanding the nature of the occupiers to be accommodated, and their related needs for locations and types of premises. Market intervention to protect or allocate sites and support provision of serviced sites may be required.” (page 49) Response: It is clear from the Study’s conclusion that the needs of urban industry must be met, with premises provided in accessible locations. Royal London’s active asset management programme ensures that their land holding remains suitable to meet the demands of occupiers and should be designated as a site for employment use (Emp 8). The online consultation does not allow for a plan of Royal London’s land holding at Seafield, which it does not want allocated for residential development, to be submitted and this will be issued via email to cityplan2030@edinburgh.gov.uk.

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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

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

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Choice **12 B4**

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

Short Response

Explanation

Choice **12 B5**

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

Short Response

Explanation

Choice **12 B6**

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

Short Response

Explanation

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Choice **12 B7**

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

Short Response

Explanation

Choice **12 B8**

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

Short Response

Explanation

Choice **12 B9**

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

Short Response

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Yes

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Email

lesley.mcgrath@holderplanning.co.uk

Response Type

Agent / Consultant

On behalf of:

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Choice 12 B10

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

Short Response

Not Answered

Explanation

Choice 12 BX

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

Short Response

Not Answered

Explanation

Choice 12 C

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

Short Response

No

Explanation

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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 D**

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

Short Response

Explanation

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Choice **13 A**

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

Short Response

Explanation

Choice **14 A**

We want City Plan 2030 to support the best use of existing public transport infrastructure in West Edinburgh and accommodate the development of a mix of uses to support inclusive, sustainable growth. We will do this through 'an area of search' which allows a wide consideration of future uses within West Edinburgh without being tied to individual sites. Do you support this approach? - Yes / No

Short Response

Explanation

Choice **14 B**

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

Short Response

Explanation

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Choice **14 C**

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

Short Response

Explanation

Choice **15 A**

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

Short Response

Explanation

Choice **15 B**

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

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Choice 15 C

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

Short Response

Explanation

Choice 15 D

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

Short Response

Explanation

Choice 15 E

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

Short Response

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Choice 15 G

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

Short Response

Explanation

Choice 16 A1

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

Short Response

Explanation

Choice 16 A2

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

Short Response

Explanation

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Email

Response Type

On behalf of:

Choice **16 A3**

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

Short Response

Explanation

Choice **16 A4**

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

Short Response

Explanation

Choice **16 A5**

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

Short Response

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **16 A5**

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

Short Response

Explanation

Choice **16 B**

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

Short Response

Explanation

Choice **16 C**

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

Short Response

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 16 E1

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

Short Response

Explanation

Choice 16 E2

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

Short Response

Explanation

Choice 16 E3

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 E4

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

Short Response

Explanation

Choice 16 E5

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

Short Response

Explanation

Choice 16 E6

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

Short Response

Explanation

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

Supporting Info

Email

Choice 16 E7

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

Short Response

Explanation

Choice 16 E8

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

Short Response

Explanation

Choice 16 EX

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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 ROYAL LONDON MUTUAL INSURANCE SOCIETY LTD, LAND HOLDING AT SEAFIELD WAY INDUSTRIAL ESTATE Whilst we agree that established employment areas should be protected, we consider that Royal London's land holding at Seafield Way should also be designated under policy Emp 8. The online nature of the consultation does not allow for a plan of their land holding to be submitted and this will be issued via email to cityplan2030@edinburgh.gov.uk. The estate has been under Royal London's ownership for in excess of 25 years and performs a long-term strategic function being one of the larger complete industrial holdings within their property fund. Significant capital investment has been deployed over recent years including acquisition of adjacent holdings, replacement roofs, cladding renewal, unit subdivision and road/service yard replacement ensuring the accommodation is fit for modern requirements. The estate is 100% let and occupied with a 100% tenant retention rate over the past 24 months. The estate has existing tenant leases in place until August 2035. DESCRIPTION, LOCATION AND ACCESS Royal London's land holding comprises an industrial estate with 18 units which accommodate a range of Class 4, 5 and 6 users and one unit, presently in Class 1 use and occupied by the retailer, Matalan. The premises range in floor area from 466 sq m to 4,476 sq m and are fully let and occupied. Tenants undertake a range of business operations comprising urban industry, trades, distribution and local services which support their local market, of which a significant proportion comprises the established urban area of north east Edinburgh. The landholding is situated in a location well suited for employment use within the City's established urban area. It is accessible by foot, cycle and vehicle. Proximity to the rail line which terminates in the Port of Leith to the west should also be noted. Vehicular access to the site is via Seafield Road (A1) to the north, which is one of the City's main road arteries and allows the site to be easily accessed by both suppliers and customers. It is notable that the Council's Commercial Needs Study: Industrial Property Market 2018 (p21), identifies that demand for industrial floor space is increasingly directed towards strategic locations with good transportation links on the edge of urban Edinburgh, including Seafield. The surrounding land uses underline the area's employment use character, comprising a collection of car sales garages, industrial premises and the Seafield sewage works located to north of Seafield Road, the Seafield Community Recycling Centre at Fillyside Road and a railway line lie to the south and mix of employment uses to the east and west. RELEVANT NATIONAL PLANNING POLICY Scottish Planning Policy, sets out national policy for 'supporting business and employment' and Development Planning must support the delivery requirements of the NPF and Policy Principles (paragraphs 92:108) Paragraph 92 sets out the current NPF context for business and employment use and states, "Planning should address the development requirements of businesses and enable key opportunities for investment to be realised. It can support sustainable economic growth by providing a positive policy context for development that delivers economic benefits." The Policy Principles set out at paragraph 93 and state that the planning system should, "allocate sites that meet the diverse needs of the different sectors and sizes of business which are important to the plan area in a way which is flexible enough to accommodate changing circumstances and allow the realisation of new opportunities." Development Plans should align with relevant local economic strategies (paragraph 94) and as set out at paragraph 101, "Local development plans should allocate a range of sites for business, taking account of current market demand; location, size, quality and infrastructure requirements; whether sites are serviced or serviceable within five years; the potential for a mix of uses; their accessibility to transport networks by walking,

Customer Ref: 01719 Response Ref: ANON-KU2U-GWV8-K
Name: Lesley McGrath
Response Type: Agent / Consultant
On behalf of: The Royal London Mutual Insurance Society Ltd

Supporting Info: Yes

Email: lesley.mcgrath@holderplanning.co.uk

cycling and public transport and their integration with and access to existing transport networks. The allocation of such sites should be informed by relevant economic strategies and business land audits in respect of land use classes 4, 5 and 6.” Response: As noted above Royal London’s landholding supports a range of business and employment uses which broadly service the established market area of north east Edinburgh. The land holding is accessible by a range of modes of transport. The nature and form of the premises allows for the changing requirements of occupiers to be accommodated – these are flexible spaces with can accommodate, processes (either Class 4 or Class 5), storage or distribution (Class 6) with ancillary office accommodation and can serve both business and the public. National planning policy provides a full justification for identifying the landholding for employment use, in accordance with existing LDP policy Emp 8.CITY PLAN 2030 – MONITORING STATEMENT The Monitoring Statement (pp 91:100) sets out the key findings of the Industrial Land Supply and Demand Report and observes that: •There has been a fall in industrial supply; •Falling supply may be constraining demand; •There is a very low vacancy rate; and Policy Emp 9 which applies to employment sites in the urban area not covered by Emp 8, has not succeeded in adequately providing adequate floor space for employment use where such use has been lost due to other forms of development. Given the findings of the Monitoring Report, proposals which support the development of the land at Seafield for residential or urban area housing led mixed use would further constrain supply and demand. Rather it is appropriate that Royal London’s landholding is identified in the forthcoming proposed Plan for employment use (Emp 8).ECONOMIC STRATEGY, ENABLING GOOD GROWTH, 2018The Economic Strategy identifies the need for a ‘new approach’ to the City’s economic development. It seeks to tackle low income, low pay and spatial inequality (pp 10:11) and strategy identifies wards surrounding the Seafield area as having poverty rates between 20% and 29% (Leith, Criagentinny/ Duddingston and Portobello/Craigmillar). The established employment area against a backdrop of limited industrial supply and constrained demand will only serve to exacerbate poverty rates in the local area. The Economic Strategy also seeks to maintain prosperity in a slow growth economy (p12) and recognises that, “Development of new, flexible workspace is a critical issue for the city. This is particularly the case for emerging growth companies in new sectors whose needs do not fit easily into traditional property models.” Royal London’s land holding provides flexible space, which is occupied by a range of users and responds directly to the Economic Strategy. As part of ‘managing a growing city’ (p13) the Economic Strategy recognises that “growth places a demand on the city to continue to provide good quality housing and jobs for an expanding population.” Royal London’s land holding provides premises for employment and economic growth.THE EDINBURGH CITY PLAN 2030 COMMERCIAL NEEDS STUDY: INDUSTRIAL PROPERTY MARKET, NOVEMBER 2018The Study makes a number of observations which underline that the identification of Royal London’s landholding for residential or urban area housing led mixed use is inappropriate. These observations are listed below with Royal London’s response.The Study identifies a vacancy rate of 4.9% (2018), noting, that available supply and take-up of industrial property have declined, potentially indicating that this low supply is constraining market demand (page 1). Response: This statement marries with the observations set out in the Monitoring Report and affirms the need to ensure the land holding is identified for employment use;The Study makes observations in relation to the redevelopment of established employment sites for alternative uses, cautioning that many inner urban occupiers service the needs of the city’s residents and businesses (page 38). Response: Occupiers of urban premises are being displaced as a result of alternative uses and the ongoing need for employment premises in urban locations therefore remain essential;The Study observes further inner urban industrial property will be lost, particularly in the north-east quadrant of the city and the waterfront (page 29) and that all completed and proposed [industrial] new developments are located on Edinburgh’s accessible western edge (page 40). Response: It is notable that new development is not coming forward in the east of the City, where employment land has been lost (Monitoring Report, page 101).The City requires to both replace and modernise its industrial stock (pp 43:44) to accommodate requirements with the need for refurbishment identified. Response: Royal London have undertaken significant investment in their land holding at Seafield ensuring that it responds to occupier requirement and this responds directly to the Study’s observations. The Study concludes that there are two related industrial property market priorities for Edinburgh’s City Plan 2030 based upon the

Customer Ref: 01719 Response Ref: ANON-KU2U-GWV8-K

Supporting Info Yes

Name Lesley McGrath

Email lesley.mcgrath@holderplanning.co.uk

Response Type Agent / Consultant

On behalf of: The Royal London Mutual Insurance Society Ltd

research presented in the report. The first priority is to, "Accommodate the modernisation and potentially the migration of urban industry within Edinburgh. The total scale and mix of in-situ refurbishment versus new-build in alternative locations will depend upon the scenario adopted. The focus for this market priority is upon understanding the nature of the occupiers to be accommodated, and their related needs for locations and types of premises. Market intervention to protect or allocate sites and support provision of serviced sites may be required." (page 49)Response: It is clear from the Study's conclusion that the needs of urban industry must be met, with premises provided in accessible locations. Royal London's active asset management programme ensures that their land holding remains suitable to meet the demands of occupiers and should be designated as a site for employment use (Emp 8).

Choice 16 H

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

Short Response Not Answered

Explanation

