

Customer Ref: **Response Ref:**

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 1 A

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

Short Response

Explanation

Choice 1 B

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

Short Response

Explanation Further information is required regarding the need to 'include green and blue infrastructure'. There may be inherent difficulties in providing green and blue infrastructure, particularly for proposals which involve the change of use of existing buildings. There may be circumstances, for example relating to the conversion of listed buildings when such a requirement may render a development unviable or unacceptable due to the impact on the special features of the building, which ought to be protected. A policy which seeks to apply such requirements to all developments is not, therefore, appropriate. The emerging development plan must recognise the potential limitations and introduce flexibility into its policies to ensure that the ability to justify development on urban sites is not hindered by unrealistic expectations to connect to green infrastructure as to do so would restrict the delivery of housing which may be acceptable in all other respects and / or to benefit greenfield release. This would undermine the intentions of the preferred Choice for the delivery of housing development, and particularly residential development on brownfield sites.

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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 The general theme should be welcomed and should be incorporated into policy, but only for sites and development for which such measures can be included. Generally, this refers to larger developments which can incorporate such measures. To impose such a requirement on smaller developments, on constrained sites, on conversions of existing buildings and including those involving listed buildings, could place an unreasonable and unviable requirement which would prevent those sites coming forward for development. Such action would restrict the redevelopment of sites within the urban area.

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Choice 2 B

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

Short Response

Explanation In principle the requirement for higher density is supported but there is concern that the minimum densities referred to in Choices are insufficiently ambitious in seeking to meet the targets. A more flexible approach should be used for the redevelopment of urban sites and balanced judgement will be required, if the urban approach to the City's growth is to be successfully delivered over the Plan period and there must be a baseline prioritisation of higher densities.

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 This is supported only when realistic in relation to the type of development proposed. It may not be an option for smaller sites and conversion of existing buildings and, therefore, the policy should allow for flexibility.

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Response Type: Agent / Consultant
On behalf of: Chris Stewart Group (CSG). Chris Stewart Group is a local develop

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Email: ps@scotthobbsplanning.com

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: No

Explanation This is an appropriate aim in principle but could introduce requirements which will affect the viability of development on urban sites. Policy should recognise that a variety of development should be permitted throughout the city to meet the various different needs and requirements of existing and future occupiers. A blanket approach to the provision of open space may reduce the opportunity for the delivery of housing and will reduce the opportunity of choice for the community. Flexibility should be introduced to allow a range of factors to be considered acceptable, and should allow for reduced open space provision where there is good quality open space in the vicinity and within easy access of a site. The LDP policy on open space provision should identify localities where there is no expectation of open space being required to support higher density housing as to do so would undermine place making objectives and risk the delivery of housing. The policy should explicitly exclude those locations from the open space requirements as being acceptable for higher density housing with little or no open space provision (such as the City centre, the Old Town and the original New Town).

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Choice **3 A**

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

Short Response

Explanation The aim to meet zero carbon standards is supported but it is considered this should be controlled through the requirements of Building Standards rather than planning policy. It is difficult to understand how the control necessary to achieve gold standard (for example internal requirements for storage could be controlled through the planning process. It is also noted that all requirements for Platinum standards are not yet defined, so would introduce significant uncertainty to the planning process. The requirement to meet the highest level platinum standards is likely to render many developments unviable. Accordingly, it is considered that achieving the higher levels above silver would affect viability of projects, and therefore, deliverability of projects. It is also considered that it can be more difficult to achieve higher standards on brownfield sites despite their clear locational and accessibility benefits, and therefore overall sustainability credentials, over greenfield sites. If standards are to be introduced, therefore, higher requirements should be sought from greenfield development than from choice 9 urban land.

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 The use of Place Briefs is supported, however the LDP omits any reference to the status these briefs will have. If they are to form part of the development plan this should be made explicit, and an appropriate timescale planned for. If they are to be material considerations the weight to be applied to them should be made clear in the LDP. The reference to community involvement is somewhat misleading – and appears to confuse Place Briefs with Local Place Plans which are included in the 2019 Planning Act as the responsibility of communities to prepare. In particular the reference in Choice 4 arguably ignores the important role of the landowner and subsequent developer of the site, with whom responsibility lies for the delivery of the aspirations included in the Brief. It must be recognised that development must also be viable, that at times communities' wishes cannot be accommodated or those wishes have to be balanced with the wider benefit of housing delivery to meet the needs of the community of Edinburgh as a whole.

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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

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

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Choice 5 C

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

Short Response

Explanation

Choice 5 D1

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

Short Response

Explanation

Choice 5 D2

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

Short Response

Explanation Contribution should only be sought for infrastructure requirements necessary for that particular development, in accordance with the requirements of Circular 03/12. CEC should also be cognisant of the steer provided by the Elswick decision on this issue, which requires development contributions to be closely aligned with the development being proposed.

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Choice 5 E

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

Short Response

Explanation

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

Choice 6 B

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

Short Response

Explanation

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Choice **7 A**

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

Short Response

Explanation

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

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

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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

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

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Choice **8 C**

We want City Plan 2030 to safeguard and add any other strategic active travel links within any of the proposed options for allocated sites. We also want the City Plan 2030 to include any new strategic active travel links which may be identified in the forthcoming City Plan 2030 Transport Appraisal, the City Mobility Plan, or which are identified through this consultation. Do you agree with this? - 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 The approach to controlling the unauthorised use of housing is supported in general, however the proposed mechanism needs to be clarified and carefully thought. The type of use which is being controlled needs to be clarified – whether it is the 'Air BnB' use or general 'serviced apartments', the latter of which make an important contribution to the mix of short term tourism and business accommodation in the City. CSG operates high quality serviced apartment developments in the city centre including the Old Town Chambers the the Edinburgh Grand, and consider they provide an important contribution to the tourism market, unlike the short term lets in Air BnB use. A blanket approach to the restriction of short term lets in an area, therefore, may not address the difficulty experienced in the city. The danger of designating an area as a STLCA is that the need to reduce or expand the zone may change and the designation of one area could shift the issues associated with the use to an alternative area in the City. It is considered that licensing is a preferred method to control short term lets to ensure there is a good balance of uses to provide sustainable communities throughout the city area.

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 The principle of retention of homes is welcomed but flexibility has to be introduced to a development plan to ensure that policy does not restrict development which may otherwise be acceptable.

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Choice **10 A**

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

Short Response

Explanation

Whilst the provision of student housing ‘at the right scale and in the right locations’ which ‘helps create sustainable communities and looks after student’s wellbeing’ is an admirable aim, the preferred approach in the Choices paper is misguided. It proposes an anti-competitive policy requiring developments “to be built for, and managed by, one of Edinburgh’s universities or colleges” which will favour the private interests of the higher education institutions in the city, at the expense of the wider interests of students. This should never be an outcome of planning policy. The policy has the real potential to allow the institutions to control the delivery of student accommodation in their interests and in particular, has the potential to control rents in the sector, reducing competition and harming the quantity and quality of purpose built student accommodation, to the detriment of the extensive student population. Paragraph 2.6 of the Housing Study recognises the benefits student housing can bring to an area, but also seeks to determine that, as a ‘transient’ population, it can also cause harm as the ‘the quantity of students can place pressures on the physical and social infrastructure of an area and change the area’s character’, despite providing no evidence of the real rather than perceived impact. It also states that some locations have had large student development where ‘much needed housing would previously have been delivered’ although again, there is no evidence that this would have been the case. It must be assumed that if this were the case, then the sites would have been developed for such housing use. A recent planning appeal decision for a student accommodation development in Edinburgh (PPA-230-2298) considered this issue and clearly demonstrates the housing supply in Edinburgh has not been impacted upon by student accommodation. The Reporter stated: “The Housing Land Audit and Completions Programme by the Executive Director of Place to the council’s planning committee in October 2019 shows that Edinburgh’s overall five-year house completions programme is 30% above the five year completions target. Furthermore, the adopted LDP assumed a contribution of 4,656 homes from windfall sites whereas the executive director reports that, since April 2015, 6,200 homes have received planning permission on windfall sites of which 1,650 have been completed and 4,140 are programmed for completion in the next five years. I do not consider that this provides clear justification for favouring housing over student accommodation on the appeal site” [SHP emphasis]. Choices seeks to require a mix of market, affordable and student housing in one development, without recognising the potential for student development to free up existing housing stock and without recognising that the ‘community’ is more than the physical development / building. The wider context of the area must be considered. The remaining requirements under the proposed new PBSA policy are equally as illogical and unjustified. The requirement for new PBSA “to be located on a direct walking, cycling, or public transport route to its intended university or college” is entirely without any evidence base or justification. It would allow CEC to refuse planning applications for PBSA located a short walk from a direct bus route, irrespective of how well located that site might be. It is a further example of how the Council fails to recognise the role of this specialist form of housing in meeting an important need, and in freeing up the existing housing stock to meet the non-student need. The reference to a maximum of 10% studios within developments is a reaction to a snapshot of the current supply in the PBSA market, and is unnecessary. The market should be left to determine what the demand is, unless of course there is intervention in that market to control the interests of established participants, contrary to the purpose of planning. It should be recognised that students contribute to the

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mix in communities and that there is a clear need for student accommodation. It is recommended that student housing is brought into the definition of housing and is considered in the housing needs assessment – as provided for in NPPF4 in England and as has been achieved in, for example, London, which has comparatively similar high-level needs for student, affordable and market housing <https://www.gov.uk/guidance/housing-supply-and-delivery>. This recognises that the provision of student housing can free up existing housing stock. Map 15 of the Monitoring Statement shows student housing locations which are clearly in accessible locations to Universities, but also accessible locations for other residents of the city. It is reasonable to assume, therefore that allowing student-only accommodation at appropriate locations delivered by any party could free up housing stock and improve the balance within the community.

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: No

Explanation Further detail is required regarding how this approach could be implemented but it is considered that it is too rigid and will affect the delivery of development proposals. The viability of schemes is a crucial part of the delivery of all development and alternative uses, in the right place, provide as valuable a contribution to the success of the city as housing. It is considered that the 50% figures suggested are arbitrary and without clear and robust justification. In particular, the background Housing Study provides no clear evidence base for this move. Planning appeal PPA-230-2298, relating to a PBSA development at 543 Gorgie Road, Edinburgh and determined as recently as 1 March 2020 considered the Council’s current interpretation of Policy Hou 1 of the adopted LDP. The Council considers that this policy requires housing to be considered for sites ahead of other uses, comparable with the aspirations behind Choice 10B. The Reporter, in allowing the appeal, concludes: “I do not consider that the intention of section 1d) of Policy Hou 1 is to indicate that all potential development sites in the urban area are to be considered for housing before being considered for other uses. This would be an unusual planning policy requirement”. The EUDG agrees with the Reporter.

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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

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Choice 11 A

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

Short Response No

Explanation No. We support the positive agenda for the provision of affordable housing but disagree with a 'one size fits all' approach. Positive policy approaches should be introduced for smaller, urban sites with a greater flexibility to interpretation of policy to allow early delivery of housing. A requirement for 35% across all developments is unrealistic, will affect the viability of sites and will impact delivery. It notes at paragraph 2.15 the requirements of Scottish Planning Policy (para 129) that consideration must be given to "the level of affordable housing contribution which is likely to be deliverable in the current economic climate, as part of a viable housing development" and considers that the level of contribution within a market site should "generally be no more than 25% of the total number of houses." It is also noted that the Housing Study refers only to Stirling Council as an example of a planning authority with a policy "requiring 33% affordable housing provision in highly pressured areas" Paragraph 2.16 of the Housing Study justifies the use of land values in Edinburgh to support "a much higher affordable housing requirement than the current 25%. An analysis suggests that 35% could be achievable". However, this 'analysis' (which has not been made available) does not relate to specific sites and the unique constraints which may exist for individual sites. It also assumes a continual high land value, which may not exist in the future. The change to values following the 2000's recession indicates that market forces play a significant factor in the delivery of housing, whether market or affordable, and alternative measures must be introduced to policy to allow flexibility in the percentage provision of affordable housing, whether on site or through commuted sum. The parameters of viability must be made clear, if there is to be confidence in this process. Affordable housing cannot be provided on all housing sites so it must be accepted that a commuted sum is acceptable in principle. Limitations in the ability of RSLs to fund and deliver on-site developments of less than 10-12 units means that affordable provision by commuted sum should be accepted for developments of 40-50 units and below. This is confirmed in the Affordable Housing Policy Delivery Report to Planning Committee 7th August 2019 which states: 4.10... In private led applications of 50 homes and below, the following factors have an impact on the viability of the development to support onsite RSL housing: 4.10.1 Listed building and conversions - construction costs associated with materials required for planning (i.e. conversions in conservation areas) are often higher than an RSL standard product. 4.10.2 Consolidation of RSL housing within a single stair - RSLs seek ownership of an entire block of properties to enable them to meet their obligations for tenants with regards to arranging repairs and maintenance of common areas. 4.10.3 Tenure blind - materials associated with creating tenure blind homes can increase costs. The Affordable Housing Policy Delivery Report also recognises the value of commuted sums in delivering projects with higher than normal infrastructure and development costs to proceed, to support the acquisition of land for affordable housing or to deliver a larger proportion of a site for affordable housing than might not otherwise be possible. The Report confirms that, since 2013, some £4.4m has been received in commuted sums with a further £2.9m being secured through s75 agreements but yet to be collected. Over the last five years just over £1m of the received commuted sum total has been used to deliver 283 affordable homes. This leaves approximately £6.3m (either received or agreed) from commuted sums to be spent delivering affordable housing in the city. This demonstrates the significant benefit of commuted sums in delivering affordable housing. It is critical that this is retained.

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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

Explanation As the housing market is dynamic, there is a great danger that being prescriptive in a development plan will result in that plan being outdated early in its life span. Each individual site requires a clear design approach based on the specific context of that site. Some urban sites do not lend themselves to, for example, family housing yet would be wholly appropriate for single and small households. It is unclear what the reference to the private rental sector means in the context of this Choice. There should be clear and unequivocal support for this sector in the LDP going forward, and consideration as to its mix and level of affordability needs careful consideration. Treating this sector in the same way as mainstream housing will fail to deliver the required level of build to rent accommodation which should become such an important part of the mix in meeting housing need and demand in Edinburgh.

Choice **12 A**

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

Short Response

Explanation Option 1, with variation and clarity CSG supports the preferred option for delivery of housing on urban land but considers that clarity is required regarding the definition of 'partners'. This definition should include the private sector and in particular those with a track record in delivering sites within the urban area. In addition, the delivery of some 17,000 homes in the urban area will require substantial investment from both private and public sectors, and will necessitate creative solutions to publicly owned land. There is limited evidence that the necessary resources and skills are available to deliver this option.

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Response Type Agent / Consultant

On behalf of: Chris Stewart Group (CSG). Chris Stewart Group is a local develope

Choice 12 B1

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

Short Response Not Answered

Explanation

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 Not Answered

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 Not Answered

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 Not Answered

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 Not Answered

Explanation

Choice 12 B9

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

Short Response Not Answered

Explanation

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Response Type: Agent / Consultant

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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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Response Type Agent / Consultant

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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 Not Answered

Explanation Not Answered

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 Not Answered

Explanation Not Answered

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 Not Answered

Explanation Not Answered

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Choice **14 C**

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

Short Response

Explanation

Choice **15 A**

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

Short Response

Explanation

Choice **15 B**

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

Short Response

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 15 C

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

Short Response

Explanation

Choice 15 D

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

Short Response

Explanation

Choice 15 E

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

Short Response

Explanation Yes. CSG has worked on several regeneration projects in Edinburgh city centre which have included hotel and service accommodation developments and have contributed to the important tourism sector in the city. The current policy of supporting new hotel provision in centres and other locations with good public transport access has been successful in securing new hotel provision in the city and the policy should be continued to support future provision.

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

Supporting Info
Email

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 Yes. The current policy of restricting uses within existing centres can lead to units being unoccupied, affecting the health and vitality and viability of the centre. New development, either as redevelopment or conversion, should be supported when it can be demonstrated that the decrease in vacancy would improve the centre.

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 For part A to succeed in meeting its objectives, parts B, C and D are unnecessary and should not be pursued as part of the LDP. Part B seeks more locations, in addition to those identified in A, for office development – this is unnecessary as the optimum locations for office development in the city are already included in A. Part C (the ‘loss of office’ policy) is also unnecessary if A is properly implemented. Seeking the retention of offices which have been rejected by the market as more appropriate for alternative uses, whether that is for reasons of location, configuration, investment required, etc., is unnecessary when there is a proactive policy which seeks the development and thereafter retention of offices in the most appropriate locations (part A). The LDP needs to accept that the change of use of offices to alternative uses can be beneficial. An office use should not be retained as such simply as it exists when the plan is adopted – it has to be high quality office accommodation, in the right location for the office user. The CSG redevelopment of the former Royal Bank of Scotland at St Andrew Square is a good example of this. The site was no longer fit for purpose but has since been redeveloped for a mixed use development which has successfully contributed to the regeneration of this part of Edinburgh. The emerging plan should ensure that there is sufficient flexibility within the policy to support not only new office development in the most appropriate locations, but also the alternative use of existing offices where these have been demonstrated not to be in the most appropriate location, and therefore failing to meet occupier requirements and therefore demand.

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **16 A2**

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

Short Response

Explanation

Choice **16 A3**

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

Short Response

Explanation

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

Customer Ref: 01738 Response Ref: ANON-KU2U-GPVX-C
Name: Scott Hobbs Planning
Response Type: Agent / Consultant
On behalf of: Chris Stewart Group (CSG). Chris Stewart Group is a local develop

Supporting Info:
Email: ps@scotthobbsplanning.com

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
Office use within the strategic centres is supported but the emerging development plan needs to accept that the loss of office use to alternative uses can be beneficial. An office use should not be retained as such simply as it exists when the plan is adopted – it has to be high quality office accommodation, in the right location for the office user. As the requirements for offices change over time, a policy which requires their retention will not necessarily retain employment – which should be the aim of policy. It is therefore more appropriate to allow for the loss of office, providing it can be demonstrated that:
• There is no need for the use,
• That the buildings no longer meet requirements,
• That it is unviable to retain or redevelop the site / building for office purposes based on investment requirements and demand or
• There are cultural or historical benefits for the proposed loss of office use
• That the proposed development includes for societal benefits which exceed those which may result from the retention of office buildings.
It is acceptable, therefore, to allow a change of use from office and the policy should not restrict such positive development.

Choice 16 A5

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

Short Response:

Explanation

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

Supporting Info
Email

Choice 16 B

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

Short Response

Explanation

Choice 16 C

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

Short Response

Explanation

Choice 16 E1

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 E2

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

Short Response

Explanation

Choice 16 E3

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

Short Response

Explanation

Choice 16 E4

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 E5

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

Short Response

Explanation

Choice 16 E6

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

Short Response

Explanation

Choice 16 E7

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

Short Response

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 16 E8

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

Short Response

Explanation

Choice 16 EX

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

Short Response

Explanation

Choice 16 F

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

Short Response

Explanation

Customer Ref: 01738 Response Ref: ANON-KU2U-GPVX-C
Name: Scott Hobbs Planning
Response Type: Agent / Consultant
On behalf of: Chris Stewart Group (CSG). Chris Stewart Group is a local developer

Supporting Info:
Email: ps@scotthobbsplanning.com

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: No

Explanation
The requirements for industrial units change over time and existing buildings can become obsolete. Many industrial estates are historically located and no longer meet modern requirements. A policy which requires their retention will not necessarily retain employment – which should be the aim of policy. It is therefore more appropriate to allow for the loss of industrial estates, providing it can be demonstrated that: • that there is no need for the use, • that the buildings no longer meet requirements, • that it is unviable to retain or redevelop the site for industrial purposes based on investment requirements and demand or • that the proposed development includes for societal benefits which exceed those which may result from the retention of industrial buildings.

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