

Customer Ref:	<input type="text" value="01755"/>	Response Ref:	<input type="text" value="ANON-KU2U-GPE3-P"/>	Supporting Info	<input type="text"/>
Name	<input type="text" value="Scott Hobbs Planning"/>			Email	<input type="text" value="ps@scotthobbsplanning.com"/>
Response Type	<input type="text" value="Agent / Consultant"/>				
On behalf of:	<input type="text" value="Edinburgh Urban Developer Group comprising Glencairn Properties, Rennick Property, Square and Crescent, Stone Acre Projects, Sundial Properties and the Thistle Property Group"/>				

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 In principle this is a good approach to delivering a sustainable, active and connected city. Choices, however, must recognise that there are limitations to the extent to which individual developments, even if proposed as part of a masterplan for a wider area, can wholly contribute and connect to the existing green network due to limitations of existing infrastructure and the spatial context to individual sites. 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 in the urban area.

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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.

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

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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 Such sites, especially those within the urban area, can contribute to the housing land supply and provide other essential development. This is particularly the case when any loss of underused open space can be compensated through investment in either the residual open space or new areas identified in the LDP, through the use of a planning obligation. In any case, where it can be demonstrated that there is a satisfactory supply of good quality open space, the loss of part of that space should be considered acceptable in principle as a balanced approach to the provision of housing within the urban area. Planning permission 17/04719/FUL involved the provision of small-scale housing development on poor-quality open space in an area of good open space provision on the edges of Baberton. The EUDG considers this is an appropriate means of ensuring good quality development within the urban area. The policy must allow for flexibility, however, to ensure that circumstances which may not be evident now do not prevent otherwise appropriate development within the life span of the emerging plan, to ensure that the plan remains relevant and up-to-date.

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 The EUDG considers this may be an appropriate approach for greenfield development or the release of large urban sites but which may constrain the delivery of smaller scale sites which are vital to the housing land supply. Flexibility should be introduced to any emerging policy.

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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 EUDG considers that 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 delivery of housing within the urban area, conflicting with the preferred option in Choice 12 to deliver more housing in 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 by the EUDG but is concerned that the minimum densities referred to in Choices are insufficiently ambitious in seeking to meet the targets for new housing in the urban area. This is particularly the case given the (potentially contradictory) policies seeking to resist the loss of offices and other uses irrespective of the contribution they currently make to the economic well being of the City. In addition, the EUDG considers that there are circumstances when this requirement may conflict with other requirements as currently contained within the Edinburgh Local Development Plan and the Edinburgh Design Guidelines – for example space standards, open space provision, day and sunlighting, and in prioritising higher densities the expectations for delivering these requirements must be managed appropriately. 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 housing 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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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, for example as determined appropriate in planning decision 18/02404/FUL/ PPA-230-2287 at 37 Corstorphine Road. Similarly, the enhancement of existing open space was supported by CEC in granting planning permission for the residential development at 69-71 Marionville Road (19/04508/FUL), which includes a requirement to cross-fund improvements in Lochend Park to address identifiable deficiencies. 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: Not Answered

Explanation The aim to meet zero carbon standards is supported but the EUDG questions the need for planning policy to seek to control matters that are the requirements of Building Standards, and which do not require strict achievement to the highest level platinum standards. 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 Group has experience of delivering projects to Gold standard (district heating system) affecting viability of a development project. Accordingly, it is considered that achieving the higher levels above silver would affect viability of projects, and therefore, deliverability of housing. 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. The EUDG also considers this requirement would conflict with the ability to meet affordable housing and RSL requirements. The higher the cost, the greater the uncertainty and the likelihood that housing will not be delivered.

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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 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. All EUDG members have actively engaged with local communities in the evolution of development proposals for many years, and the importance of this role should be fully reflected in the policy relating to the preparation of Place Briefs. It must, of course, 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.

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 The Council should engage in full consultation with all stakeholders, including the private sector which is responsible for the delivery of the greater proportion of development in Edinburgh.

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Choice 5 A

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

Short Response

Explanation

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

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Choice 5 D1

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

Short Response

Explanation

Choice 5 D2

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

Short Response

Explanation 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.

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 The requirement for developer contribution should be transparent and clear and should apply to all forms of development where that contribution is necessary and justified, in accordance with the Scottish Government's letter to CEC (17/01/20) in relation to its current draft guidance of August 2018.

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Choice **6 A**

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

Short Response

Explanation

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

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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

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.

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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

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

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Choice **8 C**

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

Short Response

Explanation

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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 can make an important contribution to the mix of short term tourism and business accommodation in the City. The Housing Study at paragraph 2.3 considers this can be achieved through policy to 'determine when a material change of use from residential to short-stay commercial accommodation has occurred'. It is not policy, however, which can determine this – it is a matter of fact and degree. The policy can only provide the framework against which proposals constituting a material change can be considered and which identify parameters when such change is, or is not, acceptable. The EUDG considers that the supply of short term let accommodation is dynamic and changes in circumstance have a significant impact on that supply and the preferred location for the 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 EUDG considers that there is a preferable alternative measure – for example a licensing system, similar to HMO licensing. The current Covid-19 situation demonstrates that there are influences outside planning control which can significantly change position regarding uses of land and the deliverability of uses. The development plan cannot always react to changes in market conditions efficiently. 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.

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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: Yes

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. There is also no recognition that affordable housing policy has actually promoted the lack of housing delivery on otherwise appropriate residential sites. 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

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that market to control the interests of established participants, contrary to the purpose of planning. It should be recognised that students contribute to the 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. The EUDG is making a submission on this basis to the current consultation on the NPF4. 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

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

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Choice **11 A**

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

Short Response

Explanation

The EUDG agrees with affordable housing requirements and has committed to its provision in accordance with policy – over the past 10 years, the EUDG as a whole has generated around 500 affordable units on site and perhaps more importantly has / will contribute around £2m as commuted sum payments for the provision of affordable housing. It supports the positive agenda for the provision of affordable housing but disagrees 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. The EUDG considers that 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”. The Housing Study (at 2.16) refers to work by the District Valuer which concludes a higher contribution than 25% is viable with an analysis suggesting 35% is achievable. It is considered that the work by the District Valuer should be made public in order to consider the inputs and indeed the viability of increasing the affordable contribution required. The EUDG has experienced difficulty in delivering market and affordable housing due to the physical and financial constraints placed by RSLs on their requirements for affordable housing – for example as they require all affordable units to be served off a single stair only, and have their own particular space and quality standards. This is a particular constraint for smaller sites, and particularly those in the urban area where higher quality design and finishes are required to ensure the development makes a positive contribution to the street scene. The optimum viable number of units per block is 10-12, equating to 40-50 unit developments. The issue of sustainability must also be taken into account when trying to deliver on site affordable properties on smaller sites. Even if RSLs were to accept less than 10 units in one location the inefficiency involved in building this into a smaller scheme in a city which is predominantly tenemental is incredibly wasteful in resource, space and materials. The diagram (uploaded in response to Choice 12C as there was no option to upload with response to Choice 11), goes some way to illustrating the problem. Option A delivers a total of 24 flats and 1,568 sqm of living space utilising two cores. RSLs are unable to accept this solution given the requirement for six affordable units off a single core. Assuming a £40,000 commuted sum requirement per unit, however, option A delivers an affordable contribution of £240,000. Note that the increase to 35% affordable would make no difference to the RSL’s ability to deliver the 8/9 units off a single core, although the commuted sum would increase to around £360,000. The sub-standard approach which the current policy requires in the delivery of affordable housing in sub-50 unit schemes is demonstrated in Options B and C. Each option delivers four fewer flats overall, around 1,000 sqm less living space and four, rather than five affordable flats. Increasing the affordable requirement to 35% would also not be capable of being accommodated in either of these options. Many urban sites are below the 40-50 unit figure and delivery would remain constrained if the policy increases the affordable requirement from 25% to 35% as on-site delivery only. 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

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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. To ensure deliverability and fairness in the requirement for affordable provision, the EUDG considers that an alternative approach should be introduced. For the reasons outlined above, 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 (at para. 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: • 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. • 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. • Tenure blind – materials associated with creating tenure blind homes can increase costs." The Affordable Housing Policy Delivery Report also recognised the value of commuted sums in delivering projects with higher than normal infrastructure and development costs, 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 £2.9 being secured through s75 agreements but yet to be collected, giving a total of £7.3m. Over the last five years just over £1m of the received commuted sum total has been utilised 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. All development places pressure on the housing market and increases the need for housing, including employment, retail, leisure and tourism. The requirement for a contribution towards affordable housing, should be applied to all forms of development (and on a sliding scale rather than for all developments of 12 or more) and not just the development which is actually delivering the housing. A 'Model' should be prepared by the District Valuer which could then be used by all parties (including land owner, prospective purchaser, applications and CEC / RSL) to assess the commuted sum which would be required to meet affordable requirements of any proposed development. This would allow for consistent and transparent application of the contribution requirement across all development proposals – either during the application process or by landowners and prospective developers at pre-application stage. This process would: • Allow for a consistent and transparent assessment of the commuted sum across all housing and other development sites throughout the city by all parties; • Address site specific constraints issues; • Allow for the increase and decrease in land values over the plan period; • Allow for different land values based on different housing areas within the city; and • Allow earlier decision making resulting in earlier delivery of housing. This would allow for a consistent application across all housing and other development sites throughout the city over the course of the plan period and an 'open book' approach to assessing viability. CEC must accept that development must be profitable to achieve delivery as with any other business. As greater risk is taken on urban land to greenfield, different profit margins should be accepted, and CEC guidance should explicitly recognise those greater risk by accepting a higher profit margin for urban land (c.20% on urban land compared to c.15% on greenfield land). It is not appropriate to consider the detail of how the model would work at this stage, but the EUDG would willingly engage with CEC and the DV to develop this further during the course of the preparation of the Proposed Plan stage of City Plan 2030. In addition, the EUDG is engaging with the NPF4 process to promote the standardised model approach at national level also.

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Email

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, the EUDG considers that there is a great danger that being prescriptive in a development plan will result in that plan being outdated early in its life span. The potential implications of the current Covid-19 situation cannot yet begin to be understood, yet policy could be brought into effect, based on previous circumstances, and which may require a totally different approach to housing delivery. 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. The EUDG considers that this approach would result in a constraint on housing delivery on brownfield sites, which in turn would not favour its preferred approach for housing delivery on brownfield sites, to the benefit of greenfield land release. Should the Council wish to introduce a prescriptive approach towards type and tenure, if it intends releasing land in its own ownership, it would have the ability as landowner to impose such restrictions and would not need to rely on the planning process. 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. In overall terms, The EUDG considers that option C is preferable (updated current policy), with new, strengthened guidance produced in parallel with the LDP based on the comments outlined above, and providing absolute clarity on, in particular, the choices supported in delivering affordable housing in the city. The role of commuted sums, based on fully transparent viability assessments, should be included in that guidance as a legitimate option, recognising the benefits these can often bring in funding appropriate affordable housing provision throughout the city.

Customer Ref: 01755 Response Ref: ANON-KU2U-GPE3-P
Name: Scott Hobbs Planning
Response Type: Agent / Consultant
On behalf of: Edinburgh Urban Developer Group (EUDG)

Supporting Info:
Email: ps@scotthobbsplanning.com

Choice 12 A

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

Short Response Option 1 (Council/

Explanation Option 1, with variation and clarity Consistent with its existing delivery of new homes, the EUDG supports the preferred option for delivery of housing on urban land but considers that clarity is required regarding the definition of ‘partners’. The EUDG considers this definition should include the private sector and in particular those with a track record in delivering sites within the urban area. The EUDG can facilitate the Council to achieve its aims, although greater clarity is required, particularly regarding requirements for infrastructure, and flexibility is introduced to deliver the difficult urban sites. The EUDG is concerned that the approach set out in the Choices paper for Option 1 cannot realistically be achieved, and that the emerging plan, if based on this approach, will fail unless the private sector is recognised as a vital partner. Choices and the Housing Study state the need for CEC to start delivery immediately, that this approach may not be financially viable and that there may be a need for CPO powers. Achievement of the housing target relies on higher levels of delivery as the explanatory paragraph to Chart 22 explains: “During the early part of the plan period, following the credit crunch, the number of homes completed was significantly below the level required to meet the target. Development activity has since increased and, should current development levels continue, the overall target will be met”. The potential for development activity to remain at the higher levels is not a given, and has been seriously undermined by the Covid-19 crisis. There are always inherent delays in the delivery of housing from adoption of the development plan to start on site. The Monitoring Statement demonstrates that of the 32,170-35,301 capacity allocated in ELDP, only 9,923 have been delivered (between 28% and 31%). It is clear, therefore, that delivery of housing to 2030 cannot simply be in the hands of CEC and public sector partners – the private sector is a vital source of the delivery of housing and flexibility needs to be introduced to allow smaller urban sites to be brought forward. The EUDG appreciates that it is likely that the intention of Option 1 is to be inclusive, with ‘partners’ including all stakeholders with a responsibility for delivering housing in the city, but this is not currently clear from the emerging drafting of the LDP. Paragraph 4.6 states: “The Council and its partners will need to rapidly intervene to bring forward the delivery of urban land for new homes. Delivery will need to start immediately to enable the Council to achieve an annual delivery rate of 3,340 units per year to prevent the release of further green belt land” although paragraph 3.13 states that current delivery rates, in a high activity period, are 2,500 – i.e. a 25% increase in delivery per annum. So, this option requires a significant and immediate increase in delivery but also clearly relies on processes which are inherently time-constrained (CPO, use restrictions, emerging preferences to retain some non-housing uses and dilute others, etc.). Map 11 of the Monitoring Statement demonstrates that the smaller developments completed by EUDG are in the highly accessible locations – no barrier should be introduced to prevent these important schemes being delivered. The EUDG considers that the site assessment of the Housing Study is not robust and should not be relied on to allocate sites – there is, for example, no explanation why different weight is given to different constraints on different sites, for example Seafield (no 5) is allocated one 1 red and one 1 yellow score, but is overall a ‘Red’ with no development prospect whereas West Bowling Street green (no 7) is identified with 1 red and 2 yellow scores and an overall score of ‘Yellow’ ie with some development potential. Additionally, whilst not completely clear, it seems that some sites are assessed as ‘Red’ despite having the benefit of planning permission (i.e. those on Lanark Road) and Astley Ainslie (no 259) is identified as a ‘red’ site in the table, but referred to as one of the 142 sites with medium to high development potential in paragraph 2.10 This demonstrates the problem with background

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papers to a development plan discounting a site as not suitable for development prior to full transparent assessment being given to all aspects of a proposed development and to allow a balanced approach to be taken to the issues raised. In times of great housing need, it may be more appropriate for a planning authority to place greater weight on the deliverability of housing than, for example, absolute accessibility to an area of employment cluster within 30-minute walk. All sites within the urban area should be considered as suitable for development in principle, subject to detailed assessment.

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

Customer Ref: 01755 Response Ref: ANON-KU2U-GPE3-P

Name: Scott Hobbs Planning

Response Type: Agent / Consultant

On behalf of: Edinburgh Urban Developer Group (EUDG)

Supporting Info:

Email: ps@scotthobbsplanning.com

Choice 12 B3

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

Short Response:

Explanation

Choice 12 B4

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

Short Response:

Explanation

Choice 12 B5

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

Short Response:

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **12 B6**

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

Short Response

Explanation

Choice **12 B7**

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

Short Response

Explanation

Choice **12 B8**

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

Short Response

Explanation

Customer Ref: 01755 Response Ref: ANON-KU2U-GPE3-P

Supporting Info

Name: Scott Hobbs Planning

Email: ps@scotthobbsplanning.com

Response Type: Agent / Consultant

On behalf of: Edinburgh Urban Developer Group (EUDG)

Choice 12 B9

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

Short Response: Not Answered

Explanation

Choice 12 B10

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

Short Response: Not Answered

Explanation

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

Customer Ref:

01755

Response Ref:

ANON-KU2U-GPE3-P

Supporting Info

Name

Scott Hobbs Planning

Email

ps@scotthobbsplanning.com

Response Type

Agent / Consultant

On behalf of:

Edinburgh Urban Developer Group (EUDG)

Choice 12 C

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

Short Response Yes

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

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

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **12 D**

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

Short Response

Explanation

Choice **13 A**

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

Short Response

Explanation

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

Customer Ref: Response Ref:

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Choice **14 B**

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

Short Response

Explanation

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

Customer Ref: Response Ref:
Name
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On behalf of:

Supporting Info
Email

Choice 15 B

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

Short Response

Explanation

Choice 15 C

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

Short Response

Explanation The EUDG supports the potential to redefine existing town and local centres and considers that consideration should be given to reducing the boundaries and restricting the areas of centres or including residential as appropriate uses in the centres to support existing services and to combat the decline of High Street retailing.

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Choice 15 D

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

Short Response

Explanation

Choice 15 E

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

Short Response

Explanation

Choice 15 G

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

Short Response

Explanation 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 residential development, either as redevelopment or conversion, should be supported when it can be demonstrated that the increase in resident population or the decrease in vacancy would improve the centre.

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Supporting Info
Email

Choice 16 A1

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

Short Response

Explanation The EUDG supports office use within the locations referred to in 16A(1) – critically, however, failure to do more than simply ‘support’ office development in these locations, rather than resist it elsewhere, will dilute the delivery across the city and undermine the success of the policy which is focussed on delivering offices in the most appropriate locations. As a consequence, 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, and particularly residential use 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 experience of the EUDG is that only good quality office accommodation is viable and that when faced with choice, businesses will only occupy the higher grade offices due to the need to meet modern working practices, including the need for staff retention, which is an issue beyond planning control. The City Plan 2030 Monitoring Statement demonstrates that there is a large range of office stock in Edinburgh. The maps and charts show a variety of office types in the City from one star (practically uncompetitive, possibly functionally obsolete) to five star (exemplary, state-of the art). It is illogical to require functionally obsolete one or two star office developments to be retained in office use when many of these could be converted to residential development in accordance with the overarching aim of the plan. Several one and two star offices are located within highly accessible areas in the city centre. There should be a clear preference to deliver housing on urban/brownfield sites to avoid the release of greenfield sites. However, as sites are often limited in brownfield areas, office conversions have allowed the EUDG to deliver many residential units in these areas. A blanket restriction (in the city centre or otherwise) is not viable nor reasonable, will restrict the delivery of residential units in the urban area and will undermine the deliverability of the plan. On occasion, therefore, it is correct to allow a change of use from office, particularly to residential use – whether that refers to offices in the West End, for which the EUDG has delivered many residential units as change of use to residential, or poor quality office use, for example reference 18/07826/FUL, Canon Street. The Monitoring Statement identifies where offices have been changed to alternative uses, and it is clear that a considerable number within the city centre are important listed buildings. EUDG members have been responsible for many of these developments. The investment in those buildings from the conversions has ensured the preservation of the buildings for the future and has reinstated the original use for which the building was designed. The reintroduction of residential use has also had the benefit of improving the balance of uses and of creating a sustainable community in the city centre. It is clear, therefore, that there are different reasons why a change from office use should be acceptable, notwithstanding any overall requirement for office floorspace. The emerging plan should ensure that there is sufficient flexibility within the policy to support not only new office development in the most

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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.

Choice **16 A2**

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

Short Response

Explanation

Choice **16 A3**

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

Short Response

Explanation

Customer Ref: 01755 Response Ref: ANON-KU2U-GPE3-P

Name: Scott Hobbs Planning

Response Type: Agent / Consultant

On behalf of: Edinburgh Urban Developer Group (EUDG)

Supporting Info:

Email: ps@scotthobbsplanning.com

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: Not Answered

Explanation

Customer Ref: 01755 Response Ref: ANON-KU2U-GPE3-P
Name: Scott Hobbs Planning
Response Type: Agent / Consultant
On behalf of: Edinburgh Urban Developer Group (EUDG)

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
The EUDG supports office use within the strategic centres but considers that the emerging development plan needs to accept that the loss of office use to alternative, and particularly residential, use 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 experience of the EUDG is that only good quality office accommodation is viable and that when faced with choice, businesses will only occupy the higher grade offices due to the need to meet modern working practices, including the need for staff retention, which is an issue beyond planning control. The Monitoring Statement identifies the areas of office use loss, and it is clear that a considerable number within the city centre are important Listed Buildings. The EUDG has been involved with many of these developments. The investment in those buildings from the conversions has ensured the preservation of the buildings for the future and has reinstated the original use for which the building was designed. The reintroduction of residential use has also had the benefit of improving the balance of uses and of creating a sustainable community in the city centre. It is clear, therefore, that there are different reasons why loss of office is acceptable, notwithstanding any overall requirement for office floor space and the emerging plan should ensure that there is sufficient flexibility within the policy to support the loss of office use where this can provide greater benefits to the city. 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, particular to residential use – whether that refers to offices in the West End, for which the EUDG has delivered many residential units as change of use to residential, or poor quality office use, for example reference 18/07826/FUL, Canon Street and the policy should not restrict such positive development.

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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:

Name

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On behalf of:

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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

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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 The EUDG supports this approach in principle, providing it is not imposed as a requirement on all urban sites. Many urban sites are not appropriate for business use, or a mix of uses and the appropriateness must be dependent upon the context to the site.

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 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 demonstrate 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.

Customer Ref: 01755 Response Ref: ANON-KU2U-GPE3-P

Name Scott Hobbs Planning

Response Type Agent / Consultant

On behalf of: Edinburgh Urban Developer Group (EUDG)

Supporting Info

Email ps@scotthobbsplanning.com

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

Typical Tenement Site: Residential Options Diagram

OPTION A

Number of Storeys:	4
Number of Flats:	24
Number of Cores:	2
Livable Area:	1568m ²
Common Circulation Area:	216m ²
Affordable Contribution:	circa £240,000

OPTION B

Number of Storeys:	4
Number of Flats:	20
Number of Cores:	3
Livable Area:	1460m ²
Common Circulation Area:	324m ²
Affordable Housing:	4 Flats
<ul style="list-style-type: none"> - Non-compliant number of affordable flats. - Not desirable for RSL due to high maintenance costs and lack of housing mix. 	

OPTION C

Number of Storeys:	4
Number of Flats:	20
Number of Cores:	3
Livable Area:	1475m ²
Common Circulation Area:	319m ²
Affordable Housing:	4 Flats
<ul style="list-style-type: none"> - Non-compliant number of affordable flats. - Not desirable for RSL due to high maintenance costs and lack of housing mix. 	



Key: Common Area 1-Bed Flat 2-Bed Flat 3-Bed Flat