

Customer Ref: 01698 Response Ref: ANON-KU2U-GPHC-9
Name: Callum Fraser (Iceni Projects)
Response Type: Agent / Consultant
On behalf of: Primus Riccarton Limited

Supporting Info:
Email: Cfraser@iceniprojects.com

Choice 1 A

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

Short Response:

Explanation:

Choice 1 B

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

Short Response:

Explanation:

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On behalf of:

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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Supporting Info

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Choice **1 F**

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

Short Response

Explanation

Choice **1 F**

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

Short Response

Explanation

Choice **1 G**

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

Short Response

Explanation

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Choice **1 H**

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

Short Response

Explanation

Choice **2 A**

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

Short Response

Explanation

Choice **2 B**

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

Short Response

Explanation

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Choice 2 C

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

Short Response Not Answered

Explanation Not Answered

Choice 2 D

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

Short Response Not Answered

Explanation Not Answered

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 Not Answered

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Choice **4 A**

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

Short Response

Explanation

Choice **4 B**

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

Short Response

Explanation

Choice **5 A**

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

Short Response

Explanation

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Choice **5 B**

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

Short Response

Explanation

Choice **5 C**

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

Short Response

Explanation

Choice **5 D1**

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

Short Response

Explanation

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On behalf of:

Choice 5 D2

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

Short Response

Explanation

Choice 5 E

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

Short Response

Explanation

Choice 6 A

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

Short Response

Explanation

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Choice **6 B**

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

Short Response

Explanation

Choice **7 A**

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

Short Response

Explanation

Choice **7 B**

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

Short Response

Explanation

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Choice **7 C**

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

Short Response

Explanation

Choice **7 D**

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

Short Response

Explanation

Choice **8 A**

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

Short Response

Explanation

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Supporting Info

Email

Choice **8 B**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

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Choice **9 A**

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

Short Response

Explanation

Choice **9 B**

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

Short Response

Explanation

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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: No

Explanation

Choice 10A proposes a revision to the current policy on purpose-built student housing. The revised policy would require:1. New purpose-built student accommodation to be located on a direct walking, cycling, or public transport route to its intended university or college;2. To deliver market and affordable housing as part of the mix3. To be built for, and managed by, one of Edinburgh’s universities or colleges, and4. Deliver a maximum of 10% studio flatsIn addition, a new policy framework is proposed requiring the provision of housing on all sites over a certain size coming forward for development. Specifically, on sites over 0.25 hectares coming forward for student housing, hotels and short-stay commercial visitor accommodation, and other commercial business, retail and leisure developments, at least 50% of the site should be provided for housing. Whilst acknowledging the sentiment underpinning the proposed policy revision – the need to achieve an appropriate scale of student housing in appropriate locations, the desire to create sustainable communities and to ensure the wellbeing of students - Primus do not agree with this suggested policy approach, we comment on the proposed policy tests below.1. New purpose-built student accommodation to be located on a direct walking, cycling, or public transport route to its intended university or collegeAdopted LDP Policy HOU 8 requires student housing development to be located “appropriately” in terms of access to university and college facilities by walking, cycling or public transport. Accessibility to higher education establishments by sustainable transport modes is an established policy test and, in our experience, rigorously applied. The revised policy proposal amends this by requiring development to be located on a “direct walking, cycling, or public transport route to its intended university or college”. No definition of what constitutes a “direct” route is provided. At face value, the imposition of such a requirement appears onerous and overly restrictive. Primus consider the relevant provisions of Policy HOU 8 to be sufficient to ensure sustainable travel patterns are achieved and should be retained.2. To deliver market and affordable housing as part of the mix / Sites greater than 0.25ha to provide 50% housingAlthough not clear, it is assumed the need “to deliver market and affordable housing as part of the mix” relates to Part B of the proposed policy which on sites larger than 0.25 hectares requires at least 50% of the site to be provided for housing. The premise for this requirement is the creation of strong sustainable communities. It is again relevant to reference adopted LDP Policy HOU 8 and the associated non-statutory Student Housing Guidance (Feb 2016). In specific circumstances the Student Housing Guidance requires sites with a developable area greater than 0.25 hectares to include 50% of the new build gross floor area as housing (as opposed to student accommodation). A key aspiration underpinning existing policy and guidance is to maintain balanced sustainable communities by ensuring the dominant residential community is permanent rather than transient. To achieve this, policy seeks to avoid creating an “excessive concentration” of student accommodation in any specific locality. On the 11th March 2020 the Scottish Ministers allowed an appeal relating to a proposed 249-bed purpose-built student housing development on a site at 543 Gorgie Road (PPA-230-2298.) The appeal site was larger than 0.25 ha and the decision provides useful context. CEC refused permission, referencing a failure to comply with the Student Housing Guidance on the basis that no general housing was proposed as part of the development, to the detriment of balanced housing and accommodation delivery in the City. The reporter, having determined that the proposal would not result in an excessive concentration of student accommodation in the locality, whilst noting that ‘windfall’

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housing completions and programming were in excess of projections, concluded that it would be “illogical to then pursue a policy line that reduces the potential contribution to the amount of purpose-built and managed accommodation that could be provided on the site”. The reporter’s findings indicate that existing student housing policy has not had the effect of limiting windfall housing development within the city. It recognises that balanced sustainable communities would be retained where an excessive concentration of student accommodation would not be created and, in such circumstances, it would be inappropriate to limit the amount of purpose-built student accommodation that could be provided in favour of housing. Primus supports this position. The ‘excessive concentration’ test already provides an effective means of maintaining balanced sustainable communities. To impose a 50% housing requirement on all sites larger than 0.25ha represents an onerous and potentially unworkable approach, likely to stymie the delivery of purpose-built student accommodation (and other non-housing uses in Edinburgh).³ To be built for, and managed by, one of Edinburgh’s universities or colleges. Before commenting on this proposed policy provision, we would note that Primus has commenced discussions with Heriot-Watt University regarding their development proposals. Positive initial dialogue has been held and further discussions are planned, these are likely to include the potential inclusion of the site within a revised Heriot-Watt University Campus Masterplan. There is a clear definition between university managed accommodation and private purpose-built student accommodation. Whilst providers of private student accommodation actively seek partnership agreements with higher education institutions – this does not equate to building development specifically for the institution in question. It is also the case that private student accommodation is privately managed. It is inappropriate to use planning policy to control who private student accommodation should be built for and who should ultimately manage the facility. The basis for seeking to impose such a requirement is not clear, it is assumed this relates to the aim of ensuring the wellbeing of students. If so, this appears to ignore the strict management arrangements which are put in place by private operators in support of their resident’s safety, wellbeing and living standards. Primus consider this policy requirement to be unrealistic and inappropriate, and object to its inclusion within any revised student accommodation policy.⁴ Deliver a maximum of 10% studio flats. To meet varying student needs the current guidance requires student accommodation to provide a mix of accommodation, including cluster units. The balance of accommodation within developments is an existing policy consideration and Primus would query the basis for seeking to impose such a low percentage of studio flats within any development. In terms of market placement, Primus aim at 100% studios in each development. The product they are designing and promoting in terms of rents and ultimately end sale (to both funds and individuals) demand this type of accommodation. To date, discussions with the University have been on the basis of providing a type of accommodation for which the Riccarton Campus is currently undersupplied i.e. studios. The University recognises the importance of providing studio accommodation as part of their overall accommodation offer to ensure a mix and balance is provided. The imposition of a 10% maximum studio provision is an overly prescriptive measure that is likely to impact upon the commercial models of private student accommodation providers. Primus oppose applying a blanket maximum percentage to all developments. Different locations have different requirements and the market must be able to respond to evidenced need and demand for specific types of accommodation (e.g. studios). Summary For the above reasons Primus does not agree with or support the revised policy on purpose-built student accommodation. It is considered that the existing policy which sets out criteria on which purpose-built student accommodation will be allowed - based on its concentration and location only - provides a robust framework that is effective in ensuring student accommodation is delivered at the right scale and in the right locations, helps create sustainable communities and looks after student’s wellbeing.

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Choice 10 B

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

Short Response: No

Explanation

Please refer to the response provided for question 10A.

Choice 10A proposes a revision to the current policy on purpose-built student housing. The revised policy would require:1. New purpose-built student accommodation to be located on a direct walking, cycling, or public transport route to its intended university or college;2. To deliver market and affordable housing as part of the mix3. To be built for, and managed by, one of Edinburgh’s universities or colleges, and4. Deliver a maximum of 10% studio flatsIn addition, a new policy framework is proposed requiring the provision of housing on all sites over a certain size coming forward for development. Specifically, on sites over 0.25 hectares coming forward for student housing, hotels and short-stay commercial visitor accommodation, and other commercial business, retail and leisure developments, at least 50% of the site should be provided for housing. Whilst acknowledging the sentiment underpinning the proposed policy revision – the need to achieve an appropriate scale of student housing in appropriate locations, the desire to create sustainable communities and to ensure the wellbeing of students - Primus do not agree with this suggested policy approach, we comment on the proposed policy tests below.

1. New purpose-built student accommodation to be located on a direct walking, cycling, or public transport route to its intended university or college
Adopted LDP Policy HOU 8 requires student housing development to be located “appropriately” in terms of access to university and college facilities by walking, cycling or public transport. Accessibility to higher education establishments by sustainable transport modes is an established policy test and, in our experience, rigorously applied. The revised policy proposal amends this by requiring development to be located on a “direct walking, cycling, or public transport route to its intended university or college”. No definition of what constitutes a “direct” route is provided. At face value, the imposition of such a requirement appears onerous and overly restrictive. Primus consider the relevant provisions of Policy HOU 8 to be sufficient to ensure sustainable travel patterns are achieved and should be retained.

2. To deliver market and affordable housing as part of the mix / Sites greater than 0.25ha to provide 50% housing
Although not clear, it is assumed the need “to deliver market and affordable housing as part of the mix” relates to Part B of the proposed policy which on sites larger than 0.25 hectares requires at least 50% of the site to be provided for housing. The premise for this requirement is the creation of strong sustainable communities. It is again relevant to reference adopted LDP Policy HOU 8 and the associated non-statutory Student Housing Guidance (Feb 2016). In specific circumstances the Student Housing Guidance requires sites with a developable area greater than 0.25 hectares to include 50% of the new build gross floor area as housing (as opposed to student accommodation). A key aspiration underpinning existing policy and guidance is to maintain balanced sustainable communities by ensuring the dominant residential community is permanent rather than transient. To achieve this, policy seeks to avoid creating an “excessive concentration” of student accommodation in any specific locality. On the 11th March 2020 the Scottish Ministers allowed an appeal relating to a proposed 249-bed purpose-built student housing development on a site at 543 Gorgie Road (PPA-230-2298.) The appeal site was larger than 0.25 ha and the decision provides useful context. CEC refused permission, referencing a failure to comply with the Student Housing Guidance on the basis that no general housing was proposed as part of the development, to the detriment of balanced housing and accommodation delivery in the City. The reporter,

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having determined that the proposal would not result in an excessive concentration of student accommodation in the locality, whilst noting that ‘windfall’ housing completions and programming were in excess of projections, concluded that it would be “illogical to then pursue a policy line that reduces the potential contribution to the amount of purpose-built and managed accommodation that could be provided on the site”. The reporter’s findings indicate that existing student housing policy has not had the effect of limiting windfall housing development within the city. It recognises that balanced sustainable communities would be retained where an excessive concentration of student accommodation would not be created and, in such circumstances, it would be inappropriate to limit the amount of purpose-built student accommodation that could be provided in favour of housing. Primus supports this position. The ‘excessive concentration’ test already provides an effective means of maintaining balanced sustainable communities. To impose a 50% housing requirement on all sites larger than 0.25ha represents an onerous and potentially unworkable approach, likely to stymie the delivery of purpose-built student accommodation (and other non-housing uses in Edinburgh).³ To be built for, and managed by, one of Edinburgh’s universities or colleges Before commenting on this proposed policy provision, we would note that Primus has commenced discussions with Heriot-Watt University regarding their development proposals. Positive initial dialogue has been held and further discussions are planned, these are likely to include the potential inclusion of the site within a revised Heriot-Watt University Campus Masterplan. There is a clear definition between university managed accommodation and private purpose-built student accommodation. Whilst providers of private student accommodation actively seek partnership agreements with higher education institutions – this does not equate to building development specifically for the institution in question. It is also the case that private student accommodation is privately managed. It is inappropriate to use planning policy to control who private student accommodation should be built for and who should ultimately manage the facility. The basis for seeking to impose such a requirement is not clear, it is assumed this relates to the aim of ensuring the wellbeing of students. If so, this appears to ignore the strict management arrangements which are put in place by private operators in support of their resident’s safety, wellbeing and living standards. Primus consider this policy requirement to be unrealistic and inappropriate, and object to its inclusion within any revised student accommodation policy.⁴ Deliver a maximum of 10% studio flats To meet varying student needs the current guidance requires student accommodation to provide a mix of accommodation, including cluster units. The balance of accommodation within developments is an existing policy consideration and Primus would query the basis for seeking to impose such a low percentage of studio flats within any development. In terms of market placement, Primus aim at 100% studios in each development. The product they are designing and promoting in terms of rents and ultimately end sale (to both funds and individuals) demand this type of accommodation. To date, discussions with the University have been on the basis of providing a type of accommodation for which the Riccarton Campus is currently undersupplied i.e. studios. The University recognises the importance of providing studio accommodation as part of their overall accommodation offer to ensure a mix and balance is provided. The imposition of a 10% maximum studio provision is an overly prescriptive measure that is likely to impact upon the commercial models of private student accommodation providers. Primus oppose applying a blanket maximum percentage to all developments. Different locations have different requirements and the market must be able to respond to evidenced need and demand for specific types of accommodation (e.g. studios). Summary For the above reasons Primus does not agree with or support the revised policy on purpose-built student accommodation. It is considered that the existing policy which sets out criteria on which purpose-built student accommodation will be allowed - based on its concentration and location only - provides a robust framework that is effective in ensuring student accommodation is delivered at the right scale and in the right locations, helps create sustainable communities and looks after student’s wellbeing.

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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

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

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

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Response Type

Agent / Consultant

On behalf of:

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Choice 12 A

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

Short Response

Not Answered

Explanation

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

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Choice **12 B3**

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

Short Response

Explanation

Choice **12 B4**

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

Short Response

Explanation

Choice **12 B5**

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

Short Response

Explanation

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Choice **12 B6**

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

Short Response

Explanation

Choice **12 B7**

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

Short Response

Explanation

Choice **12 B8**

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

Short Response

Explanation

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Choice 12 B9

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

Short Response:

Explanation

Choice 12 B10

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

Short Response:

Explanation

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Choice **12 BX**

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

Short Response

Explanation Primus Riccarton Ltd's land interests – whilst not within the East of Riccarton proposed greenfield area identified by Map 17 within the Choicesdocument – were included and assessed by the Housing Study as part of the ‘East of Riccarton’ area.The Council’s Greenfield Site Assessment concluded that the East of Riccarton area – in its entirety – was suitable for development.Given the very clear and definitive conclusions of the Site Assessment with regards the suitability of their land for development, Primus questions why Map17 within the Choices document, which defines Area 4 – East of Riccarton, does not include their site within the area of potential greenfield release.It is requested that this error be rectified, and the East of Riccarton boundary amended to include Primus's land to the west of Riccarton Mains Road.Further details are provided in response to Question 12C.

Choice **12 C**

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

Short Response

Explanation

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Choice **12 C**

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

Short Response

Explanation

Choice **12 C**

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

Short Response

Explanation

Choice **12 D**

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

Short Response

Explanation

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Choice 13 A

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

Short Response 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

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Email

Choice 15 C

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

Short Response

Explanation

Choice 15 D

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

Short Response

Explanation

Choice 15 E

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

Short Response

Explanation

Customer Ref: 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

Choice 16 A1

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

Short Response

Explanation

Choice 16 A2

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **16 A3**

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

Short Response

Explanation

Choice **16 A4**

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

Short Response

Explanation

Choice **16 A5**

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

Short Response

Explanation

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

Supporting Info
Email

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

Response Type

On behalf of:

Supporting Info

Email

Choice 16 E1

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

Short Response

Explanation

Choice 16 E2

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

Short Response

Explanation

Choice 16 E3

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

Short Response

Explanation

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

Supporting Info
Email

Choice 16 E4

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

Short Response

Explanation

Choice 16 E5

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

Short Response

Explanation

Choice 16 E6

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

Short Response

Explanation

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

Supporting Info
Email

Choice 16 E7

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

Short Response

Explanation

Choice 16 E8

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

Short Response

Explanation

Choice 16 EX

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

Short Response

Explanation

Customer Ref: 01698 Response Ref: ANON-KU2U-GPHC-9
Name: Callum Fraser (Iceni Projects)
Response Type: Agent / Consultant
On behalf of: Primus Riccarton Limited

Supporting Info:
Email: Cfraser@iceniprojects.com

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:

Choice 16 G

We want to continue to protect industrial estates that are designated under our current policy on Employment Sites and Premises (Emp 8). Do you agree? - Yes / No

Short Response:

Explanation:

Choice 16 H

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

Short Response:

Explanation:

Customer Ref:

01698

Response Ref:

ANON-KU2U-GPHC-9

Supporting Info

Name

Callum Fraser (Iceni Projects)

Email

Cfraser@iceniprojects.com

Response Type

Agent / Consultant

On behalf of:

Primus Riccarton Limited



APRIL 2020

Land West of Riccarton Mains Road, Edinburgh

Response to Choices for City Plan 2030

Iceni Projects Limited on behalf of
Primus Riccarton Limited

April 2020

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ON BEHALF OF PRIMUS
RICCARTON LIMITED

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Land West of Riccarton Mains Road,
Edinburgh
RESPONSE TO CHOICES FOR CITY PLAN 2030

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1. EXECUTIVE SUMMARY

1.1 This statement has been prepared by Icen Projects on behalf of Primus Riccarton Limited (Primus). It should be read in association with Primus's representations to the Choices for City Plan 2030 consultation which have been submitted via the online survey.

1.2 A summary overview of the submission is provided below:

- Primus is promoting land west of Riccarton Mains Road, adjoining Heriot Watt University's Riccarton Campus, for allocation within the emerging City Plan;
- Specifically, Primus is promoting the development of purpose-built student accommodation on the site (c. 300-bed capacity);
- The site is controlled by Primus, the site is 'effective' and development can proceed in the short-term without third-party land or significant infrastructure interventions;
- Important infrastructure to support development (roads, active travel connections and public transport services) is already in place;
- This submission should be viewed in context with the representations prepared separately by H&H Group Plc – the ultimate site owner – which seek the release of land both east and west of Riccarton Mains Road from the greenbelt and its allocation for housing-led development within City Plan 2030;
- The site was assessed by the Choices for City Plan Housing Study as part of the 'East of Riccarton' area. The Council's Greenfield Site Assessment concluded that the East of Riccarton area – in its entirety – was suitable for development. Primus welcomes this recognition;
- In relation to 'Choice 10' of the consultation document, Primus is concerned that the terms of the revised policy on purpose-built student housing – in particular the need to deliver market/affordable housing as part of the development mix, and requirement to be built for/managed by one of Edinburgh's universities or colleges – is unduly restrictive to PBSA

2. SITE & SURROUNDINGS

- 2.1 The site extends to approximately 1.1 hectares and is located immediately adjacent to the Heriot Watt University Campus. The site is shown edged in red on the accompanying site location plan (Appendix A1).
- 2.2 Riccarton Mains Cottages bound the site to the north with the roundabout providing access to the university campus lying beyond. Riccarton Mains Road defines the site's eastern boundary. The Heriot Watt University campus immediately bounds the site to the west.
- 2.3 The site is triangular shaped, topographically it is slightly undulating, generally sloping from south to north. It is currently in agricultural use.
- 2.4 In terms of the surrounding area, open fields generally characterise the land extending to the north and north-east of the site – stretching to Calder Road in the north and the City Bypass to the north-east. Notably, this area of land is identified by the Choices for City Plan document as having potential for a new urban extension to Edinburgh (Area 4 – East of Riccarton).
- 2.5 Currie is situated a short distance from the southern boundary of the site. The Heriot Watt University Campus, immediately to the west of the site, is the dominant feature within the surrounding area.
- 2.6 In short, despite comprising agricultural land within the green belt, the site is located within an area that is already quite strongly characterised by 'urban' elements – most prominently Heriot Watt University Campus. The area is potentially subject to significant change should the East of Riccarton urban extension come forward.

3. COMMENTARY ON CEC'S GREENFIELD SITE ASSESSMENT

3.1 This section provides commentary on the 'Greenfield Site Assessment' presented by the City Plan 2030 Housing Study (Part 2b, p160-162).

3.2 The site forms part of the 'East of Riccarton' assessment area. Given its importance in the context of this submission, the conclusion of the Council's Site Assessment is reproduced in full below:

"The site is considered suitable for development, despite not being within the SESplan Strategic Development Areas as set out in its spatial strategy, and poor accessibility in the short/medium term. The site should be considered as an urban extension between the City of Edinburgh Bypass and Riccarton. Any development should have regard to areas of flood risk, potential blue/green infrastructure, the improvement of Riccarton Mains Road for active travel and public transport users and improving access across the Bypass to the existing urban area. Although public transport access remains relatively poor in the short term and major intervention is only expected post-plan, the site is located adjacent to the Hermiston Park and Ride site and some high frequency bus services serve the area. As the site is not within the SESplan spatial strategy it should be considered as a reasonable alternative to other sites within the Strategic Development Areas.

Development of the site will result in a new settlement boundary beyond the Bypass formed by the railway line, Riccarton and Calder Road/Hermiston and opportunities to enhance screening by tree planting in relevant areas should be considered, particularly where the site faces the Bypass although there may also be scope for non-housing land-uses to act as a buffer to the Bypass. Accessibility improvements are required to enable development, and a new crossing over the Bypass to Wester Hailes would be required as well as improvements to Riccarton Mains Road and Calder Road to improve walking and public transport. The masterplan for the site should have regard to a potential long-term major public transport intervention to serve the wider area. A strategy for moving or undergrounding the overhead power lines should be investigated to improve the development potential in this area, if not appropriate uses should be found for the land below these lines. As part of the development of a wider strategic green network, connections should be made to the area of medium-high flood risk within the site, associated with the Murray Burn, which is identified as a potential landscape-scale component of the network. The level of development proposed here and in adjacent sites would require three new non-denominational primary schools, one new roman catholic primary school and one new nondenominational secondary school. There would be a partial requirement for a new Roman Catholic secondary school to address growth here and citywide. These requirements should be co-ordinated through a brief for this site"

3.3 Primus welcomes this conclusion which recognises:

- the suitability of the East of Riccarton area, in its entirety, for development;

- that the East of Riccarton area should be considered as “*an urban extension between the City of Edinburgh Bypass and Riccarton*”;
- that “*development of the site will result in a new settlement boundary beyond the Bypass formed by the railway line, Riccarton and Calder Road/Hermiston*”;

3.4 Whilst only forming a minor part of the wider ‘East of Riccarton’ area, given these very clear and definitive conclusions Primus question why Map 17 within the Choices document, which defines Area 4 – East of Riccarton, does not include their landholding as part of the potential greenfield release. It is requested that this error be rectified, and the East of Riccarton boundary amended to include the land subject to this submission

3.5 With reference to the specific site assessment criteria contained within CEC’s Greenfield Site Assessment, additional analysis in relation to the criteria of relevance to this submission is provided below:

Active Travel / Public Transport

3.6 The site location dictates that it is accessible by a range of sustainable travel modes, including active travel connections.

3.7 Pedestrians and cyclists can utilise the many footpaths and cycle routes in the area. Footways exist on Riccarton Mains Road linking the application site to the wider footpath/footway network. These existing links afford the potential opportunity to walk from the site to local shops and facilities within Currie.

3.8 There are established cycle routes running east to west both to the north and south of the site. Both form part of the National Cycle Routes (NCR) 75 and 754 - long distance routes connecting the east and west coast of Scotland including Edinburgh and Glasgow. In addition to these National Cycle Routes, local routes exist within the Heriot Watt Campus (providing a link to NCR 754 to the north) and to the east along Baberton Road which provides a link towards Currie and Juniper Green.

3.9 The site is in close proximity to bus stops within Heriot Watt Campus, providing access to Lothian Bus routes 25, 34, 45 and N25 which offer frequent services (approximately one every ten minutes) to and from Edinburgh. Hermiston Park & Ride is adjacent to the site, also providing frequent bus services to/from the city.

3.10 There are two railway stations within reasonable distance of the campus, the closest being Curriehill Station which is located approximately 1.5km to the south west of the site (c. 15 min walk / 5 min cycle) and provides an hourly service both to Edinburgh and Glasgow Central. Edinburgh Park

Station is approximately 3km from the site and provides regular train and tram connections to the city centre.

- 3.11 As clearly evidenced, the site supports active travel and is readily accessible by existing public transport connections.

Landscape Character / Green Network

- 3.12 In landscape terms, referring to the wider 'East of Riccarton' area, the Council's site assessment concludes that:

"Scope for development on this site is identified due to the lack of scenic views across the site, lack of contribution to the setting of the city and less rural character compared to other landscapes, and the settlement pattern of Currie already being disrupted by development at Baberton. Although it is beyond the robust settlement boundary formed by the City of Edinburgh Bypass, opportunities to create new boundaries exist to the west and south".

- 3.13 Primus Property notes and welcomes the Council's acknowledgement that scope for development exists in landscape terms. As a minor element of the East of Riccarton area, and given its physical relationship with the University Campus, the landscape impact associated to the site's release from the green belt and allocation for development would be minor.
- 3.14 The site's development would also provide opportunities for green network enhancements, introducing connections through the site affording linkages with the strategic green network.

Flood Risk

- 3.15 The risk of flooding has previously been modelled, the site does not lie within the 200 year or 1 in 200 year + climate change floodplain of the Murray Burn. No risk of flooding from surface water run-off is anticipated.
- 3.16 In short, potential flood risk poses no barrier to development progressing on-site.

4. DEVELOPMENT PROPOSAL

- 4.1 This submission promotes the development of purpose-built student accommodation (c. 300 beds) on the site.
- 4.2 Current student housing policy (LDP Policy HOU8) notes that planning permission will be granted for purpose-built student accommodation where:
- The location is appropriate in terms of access to university and college facilities by walking, cycling or public transport
 - The proposal will not result in an excessive concentration of student accommodation (including that in the private rented sector) to an extent that would be detrimental to the maintenance of balanced communities or to the established character and residential amenity of the locality.
- 4.3 Given the site shares a boundary with the University Campus it could scarcely be better located in terms of its access to Heriot-Watt University by walking and cycling. Opportunities exist to further enhance the site's connectivity with the campus via direct walkways/cycleway between the two as part of any future development.
- 4.4 The development of the site for purpose-built student accommodation would, in effect, create a small expansion of the University Campus and further enhance the range and quality of accommodation on offer. Given the nature of uses within the Campus, alongside the limited number of residential properties in the immediate vicinity, the proposed development would complement the established character of the locality - there is no question of there being any detriment to the maintenance of a balanced community.
- 4.5 CEC's non-statutory Student Housing Guidance (Feb 2016) provides additional locational and design guidance in support of LDP Policy Hou 8. The Guidance advises that in locations within or sharing a boundary with (or separated only by a road) a main university or college campus, student housing will generally be acceptable. Clearly, the site complies with the locational guidance provided.
- 4.6 The Guidance seeks to ensure high standards of design and amenity, noting that "Student accommodation is a primary place of residence and therefore it is critical that design is of a high quality with adequate amenity to contribute to healthy and sustainable lifestyles". As part of any future development, Primus will ensure compliance with the requirements of the Edinburgh Design Guidance relating to design quality and key amenity considerations such as open space, daylight, sunlight, privacy and outlook.

- 4.7 Under the terms of existing policy and viewed alongside the suitability of the 'East of Riccarton' area for development - as recognised by CEC's site assessment - the site's allocation for development within the emerging City Plan represents a logical, sustainable, and viable proposition.
- 4.8 As noted previously, an associated representation has been prepared by the landowner – H&H Group Plc – which promotes both this site (i.e. land to the west of Riccarton Mains Road) and a larger area of land east of Riccarton Mains Road for release from the green belt and allocation for housing-led development within the emerging City Plan.
- 4.9 Primus's development aspirations complement this larger strategic proposal, the provision of purpose-built student accommodation as a constituent part of a wider 'East of Riccarton' urban expansion supports the Choices document's aspiration to introduce housing-led mixed-use developments across the city.

5. CHOICE 10 - CREATING SUSTAINABLE COMMUNITIES

5.1 Choice 10A of the consultation document proposes a revision to CEC's current policy on purpose-built student housing. The Choices document suggest the context for proposing the change is 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"*.

5.2 In support of this, the revised policy would require:

- *New purpose-built student accommodation to be located on a direct walking, cycling, or public transport route to its intended university or college;*
- *To deliver market and affordable housing as part of the mix*
- *To be built for, and managed by, one of Edinburgh's universities or colleges, and*
- *Deliver a maximum of 10% studio flats*

5.3 In addition, a new policy framework is proposed requiring the provision of housing on all sites over a certain size coming forward for development. Specifically, on sites over 0.25 hectares coming forward for student housing, hotels and short-stay commercial visitor accommodation, and other commercial business, retail and leisure developments, at least 50% of the site should be provided for housing.

5.4 Whilst acknowledging the sentiment underpinning the proposed policy revision – the need to achieve an appropriate scale of student housing in appropriate locations, the desire to create sustainable communities and to ensure the wellbeing of students - Primus do not agree with this suggested policy approach, we comment on the proposed policy tests below.

New purpose-built student accommodation to be located on a direct walking, cycling, or public transport route to its intended university or college

5.5 Adopted LDP Policy HOU 8 requires student housing development to be located "appropriately" in terms of access to university and college facilities by walking, cycling or public transport. Accessibility to higher education establishments by sustainable transport modes is an established policy test and, in our experience, rigorously applied.

5.6 The revised policy proposal amends this by requiring development to be located on a *"direct walking, cycling, or public transport route to its intended university or college"*. No definition of what

constitutes a “*direct*” route is provided. At face value, the imposition of such a requirement appears onerous and overly restrictive. Primus consider the relevant provisions of Policy HOU 8 to be sufficient to ensure sustainable travel patterns are achieved and should be retained.

To deliver market and affordable housing as part of the mix / Sites greater than 0.25ha to provide 50% housing

- 5.7 Although not clear, it is assumed the need “*to deliver market and affordable housing as part of the mix*” relates to Part B of the proposed policy which on sites larger than 0.25 hectares requires at least 50% of the site to be provided for housing. The premise for this requirement is the creation of strong sustainable communities.
- 5.8 It is again relevant to reference adopted LDP Policy HOU 8 and the associated non-statutory Student Housing Guidance (Feb 2016). In specific circumstances the Student Housing Guidance requires sites with a developable area greater than 0.25 hectares to include 50% of the new build gross floor area as housing (as opposed to student accommodation).
- 5.9 A key aspiration underpinning existing policy and guidance is to maintain balanced sustainable communities by ensuring the dominant residential community is permanent rather than transient. To achieve this, policy seeks to avoid creating an “excessive concentration” of student accommodation in any specific locality.
- 5.10 On the 11th March 2020 the Scottish Ministers allowed an appeal relating to a proposed 249-bed purpose-built student housing development on a site at 543 Gorgie Road (PPA-230-2298.) The appeal site was larger than 0.25 ha and the decision provides useful context.
- 5.11 CEC refused permission, referencing a failure to comply with the Student Housing Guidance on the basis that no general housing was proposed as part of the development, to the detriment of balanced housing and accommodation delivery in the City.
- 5.12 The reporter, having determined that the proposal would not result in an excessive concentration of student accommodation in the locality, whilst noting that ‘windfall’ housing completions and programming were in excess of projections, concluded that it would be “*illogical to then pursue a policy line that reduces the potential contribution to the amount of purpose-built and managed accommodation that could be provided on the site*”.
- 5.13 The reporter’s findings indicate that existing student housing policy has not had the effect of limiting windfall housing development within the city. It recognises that balanced sustainable communities would be retained where an excessive concentration of student accommodation would not be created

and, in such circumstances, it would be inappropriate to limit the amount of purpose-built student accommodation that could be provided in favour of housing.

- 5.14 Primus supports this position. The 'excessive concentration' test already provides an effective means of maintaining balanced sustainable communities. To impose a 50% housing requirement on all sites larger than 0.25ha represents an onerous and potentially unworkable approach, likely to stymie the delivery of purpose-built student accommodation in Edinburgh.

To be built for, and managed by, one of Edinburgh's universities or colleges

- 5.15 Before commenting on this proposed policy provision, we would note that Primus has commenced discussions with Heriot-Watt University regarding their development proposals. Positive initial dialogue has been held and further discussions are planned, these are likely to include the potential inclusion of the site within a revised Heriot-Watt University Campus Masterplan.
- 5.16 There is a clear definition between university managed accommodation and private purpose-built student accommodation. Whilst providers of private student accommodation actively seek partnership agreements with higher education institutions – this does not equate to building development specifically for the institution in question. It is also the case that private student accommodation is privately managed.
- 5.17 It is inappropriate to use planning policy to control who private student accommodation should be built for and who should ultimately manage the facility.
- 5.18 The basis for seeking to impose such a requirement is not clear, it is assumed this relates to the aim of ensuring the wellbeing of students. If so, this appears to ignore the strict management arrangements which are put in place by private operators in support of their resident's safety, wellbeing and living standards.
- 5.19 Primus consider this policy requirement to be unrealistic and inappropriate, and object to its inclusion within any revised student accommodation policy.

Deliver a maximum of 10% studio flats

- 5.20 In order to meet varying student needs the current guidance requires student accommodation to provide a mix of accommodation, including cluster units. The balance of accommodation within developments is an existing policy consideration and Primus would query the basis for seeking to impose such a low percentage of studio flats within any development.

- 5.21 In terms of market placement, Primus aim at 100% studios in each development. The product they are designing and promoting in terms of rents and ultimately end sale (to both funds and individuals) demand this type of accommodation. To date, discussions with the University have been on the basis of providing a type of accommodation for which the Riccarton Campus is currently undersupplied i.e. studios. The University recognises the importance of providing studio accommodation as part of their overall accommodation offer to ensure a mix and balance is provided.
- 5.22 The imposition of a 10% maximum studio provision is an overly prescriptive measure that is likely to impact upon the commercial models of private student accommodation providers. Primus oppose applying a blanket maximum percentage to all developments. Different locations have different requirements and the market must be able to respond to evidenced need and demand for specific types of accommodation (e.g. studios).

Summary

- 5.23 For the above reasons Primus does not agree with or support the revised policy on purpose-built student accommodation. It is considered that the existing policy which sets out criteria on which purpose-built student accommodation will be allowed based on its concentration and location only provides a robust framework that is effective in ensuring that student accommodation is delivered at the right scale and in the right locations, helps create sustainable communities and looks after student's wellbeing.

6. CONCLUSION

- 6.1 Primus Riccarton Limited seeks the identification of land west of Riccarton Mains Road for development within the Proposed City Plan.
- 6.2 The site's allocation for development within the emerging City Plan represents a logical, sustainable, and viable proposition. It offers significant potential for purpose-built student accommodation given its strong physical relationship with Heriot-Watt University's Riccarton Campus. The proposal complies with adopted planning policy and guidance relating to the provision of student accommodation
- 6.3 This submission should be viewed in context with the associated representations submitted by H&H Group Plc (site owner) which seeks the allocation of land both east and west of Riccarton Mains Road for housing-led development – either independently or as part of the wider 'East of Riccarton' urban expansion within City Plan 2030.
- 6.4 Primus does not support the proposed policy revision presented by the Choices for City Plan 2030 document. The existing policy framework is effective in meeting CEC's stated aspirations relating to the scale and location of student accommodation and the creation of sustainable communities and should be retained by City Plan 2030.
- 6.5 Primus would be pleased to discuss their proposals in greater detail with the council in advance of preparing Proposed City Plan 2030.



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Rev	Description	Date	By

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TBC
 Project:
TBC
 Title:
Site Location Plan

Status
Information

Project number	Date
1081	04/29/20
Drawn by	Checked by
MP	MP
Scale	Revision
1 : 1000@A1	

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1081-TGA-XX-ZZ-DR-A-0202

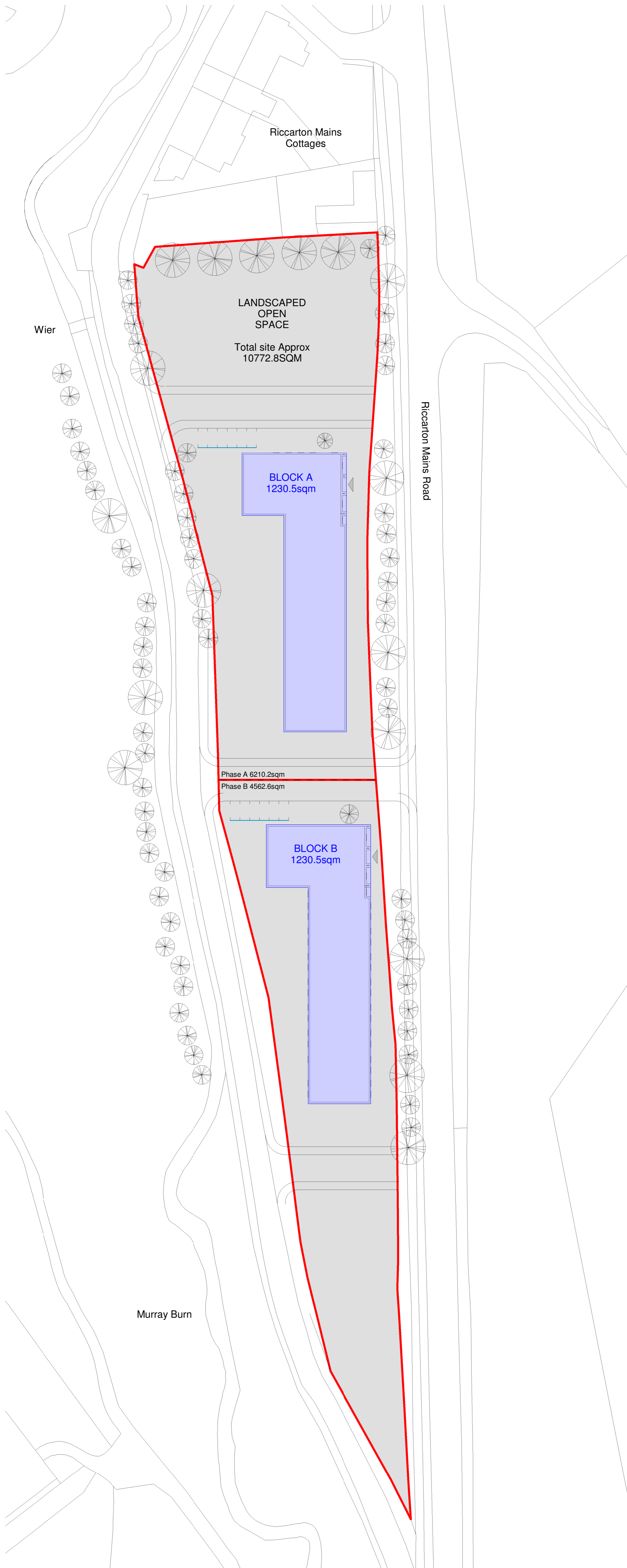


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Rev	Description	Date	By
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Client
Owner

Project
Project Name

Title
Name

Status

Project number
1081 Date
02/06/19

Drawn by
Author Checked by
Checker

Scale
1 : 500@A1 Revision

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