

**Customer Ref:**       **Response Ref:**

**Name**

**Response Type**

**On behalf of:**

**Supporting Info**

**Email**

**Choice**      **1 A**

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

**Short Response**

**Explanation**

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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** In principle, Savills Edinburgh support the provision of green and blue infrastructure in all development. However, we would call for a proportional and flexible policy that allows respective developers to respond to the respective site that they are dealing with. In addition, it should be made clear in the formulation of the above policy as to what the Council will support in terms of green and blue infrastructure when adoption of the maintenance of such assets or the particular specification is controlled by separate legislation/regulations. In addition, health and safety legislation must be a consideration when outlining what green and blue infrastructure is permissible. We are aware of circumstances in development sites across Scotland where one solution in one Planning Authority area is not supported in another area, for example a road-side swale. To allow developers to operate their businesses effectively in the delivery of buildings (and to contribute to economic growth) certainty is key. We consider City of Edinburgh Council could make their expectations clear in detailed policy in due course, this could be done in collaboration with respective developers. The provision of green and blue infrastructure will play a part in the wider delivery of a site, for example in terms of a drainage solution for surface flood water. As a result, formulation of policy should also consider Scottish Water and SEPA's input, as well as the collaboration with the development industry outlined above. We consider this collaborative approach is in line with emerging national policy and guidance.

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** In principle, Savills Edinburgh support the identification of green/blue water corridors to help mitigate climate change. As per our point for 1B, we consider detailed policy should be formulated via a collaborative approach with relevant stakeholders and the development industry to allow consistency and certainty in future water management measures on development sites.

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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

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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Email

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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On behalf of:

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Email

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

Customer Ref: 00362      Response Ref: ANON-KU2U-GPR6-6  
Name: Craig Gunderson  
Response Type: Agent / Consultant  
On behalf of: Savills (UK) Ltd

Supporting Info: Yes  
Email: craig.gunderson@savills.com

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: Not Answered

**Explanation**

Savills supports the aspiration to ensure the efficient use of land. Notwithstanding, Savills are of the view that the requirement to introduce a minimum density for housing development mechanistically (65 dwellings per hectare) within both the urban area and greenfield sites needs to be carefully considered as to whether it is achievable and if it will deliver beneficial results. A vertical mix of uses may be appropriate in some locations, however, any policy provision would need to be realistically applied. Care needs to be taken that policies on increased density and vertical mixes are not a substitute for allocating sufficient land for the development needs of the city. Savills understands views are being sought on the following:

1. A minimum density of at least 65 dwellings per hectare for all housing development.
2. A minimum density of 100 dwellings per hectare in currently unspecified locations which are identified for 'higher density development'.
3. A policy on vertical mix of uses.

Minimum density of 65 dwellings per hectare

Firstly, grouping brownfield and greenfield sites into similar density requirements poses challenges. Brownfield sites require very little supporting infrastructure increasing the available developable site area for housing. By contrast, greenfield sites require new roads, footpaths, recreation spaces, SUDS infrastructure and landscape buffers reducing the developable area. It is therefore, inadequate to apply this mechanistic minimum broadly across all housing developments. In terms of current suburban development densities, Greendykes South has been analysed which is a development site being progressed by Taylor Wimpey located in the south-east of the city. The development will comprise 59% terraces, 34% apartments and 7% being a mix of detached and semi-detached housing. This is viewed as a particularly high density suburban development but only equates to 60 dwellings per hectare. As such, this would not meet the minimum density requirements being proposed in Issue Likewise, sites nearby Greendykes South, such as Edmonstone and Shawfair are expected to deliver significantly below the minimum density requirements proposed at c. 30-40 dwellings per hectare. It should be noted that these two sites are predominantly detached and semi-detached houses being delivered. Following on from this, if this mechanistic requirement is required there will likely be undesirable consequences. The mix of house types being delivered will be substantially reduced as extensive quantum's of flats and terraced housing will be necessary to meet minimum densities. Consequently, the minimum density requirements proposed will have significant implications for the suburban residential market, making traditional market family housing delivery more difficult. In turn, this could bring increased pressure on the pricing of houses as the proposed densities will result in the delivery of larger quantities of apartments to meet minimum requirements. The availability of semi-detached and detached family housing will likely fall due to requirements for increased housing density within proposed developments with the market price of these housing types increasing. As such, these proposals could make it harder for individuals to purchase or rent accommodation that meets their needs. The supply of new housing for families will be limited, whether they be detached or semi-detached, on suburban sites. The unintended impacts of this shift in policy goes against one of the fundamental principles of the Choices for City Plan 2030 which is to ensure Edinburgh is a 'a city in which everyone lives in a home which they can afford'. Savills supports the efficient use of land but raises concerns that the current proposals will do this at the expense of providing a variety of homes for people to live in. The application of a mechanistic minimum density would be contrary to the aims of SPP which states: "Planning can help to address the

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challenges facing the housing sector by providing a positive and flexible approach to development.” (para. 109) and “The planning system should: have a sharp focus on the delivery of allocated sites embedded in action programmes, informed by strong engagement with stakeholders.” (para. 110)A minimum density of 100 dwellings per hectare in specific locationsSavills does not object to identifying certain locations for higher density development, notwithstanding, this should be done in consultation with those promoting development in these locations.Requiring a vertical mix of usesSome locations may be suitable for a vertical mix of uses, such as town centre sites where there is high footfall. Locational requirements need to exist from commercial occupiers whose operations can complement residential uses.Overall, we are supportive of ensuring development makes efficient use of available land for housing, notwithstanding, we do not agree with the requirement for a significant shift in minimum densities across the city on urban and greenfield housing sites. There needs to be a realisation that delivering the identified densities (65 dwellings per hectare) across the city on all sites is not achievable and could result in serious implications for the delivery and affordability of housing going forward in Edinburgh impeding the Council’s ambitions to deliver a considerable number of homes over the plan period.

Choice **2 C**

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

Short Response

Explanation

Choice **2 D**

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

Short Response

Explanation

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Choice **3 A**

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

Short Response

Explanation

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** Savills Edinburgh are supportive of collaborative working and the production of Place Briefs. Indeed, we consider that this is in line with emerging policy and guidance. A collaborative approach allows for all issues to be identified at an early stage and this can significantly improve the finished development and give certainty to all parties involved. However, it is absolutely critical that all stakeholders, including the private sector, are involved in creating a Place Brief for a respective site. Without this interaction there is concern that expectations will be raised in communities and the reality of the site will not be conveyed. For example, consideration must be made of constraints that affect a site, drainage, contamination etc. In addition, without considering the actual landowner in a Place Brief it would be unclear as to how much weight a Place Brief could hold. Effective placemaking and an infrastructure first approach, as advocated by emerging policy and guidance, requires all interested parties to collaborate. We consider this is a better approach to development because parameters can be set and better, more realistic results can still be achieved.



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Choice **4 B**

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

Short Response

Explanation

Choice **5 A**

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

Short Response

Explanation

Choice **5 B**

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

Short Response

Explanation

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Choice **5 C**

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

Short Response

Explanation

Choice **5 D1**

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

Short Response

Explanation

Choice **5 D2**

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

Short Response

Explanation

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Choice 5 E

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

Short Response

Explanation

Choice 6 A

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

Short Response

Explanation

Choice 6 B

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

Short Response

Explanation

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On behalf of:

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Email

Choice **7 A**

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

Short Response

Explanation

Choice **7 B**

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

Short Response

Explanation

Choice **7 C**

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

Short Response

Explanation

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Choice **7 D**

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

Short Response

Explanation

Choice **8 A**

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

Short Response

Explanation

Choice **8 B**

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

Short Response

Explanation

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Choice 8 C

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

Short Response

Explanation

Choice 8 C

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

Short Response

Explanation

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

Customer Ref: 00362 Response Ref: ANON-KU2U-GPR6-6

Supporting Info Yes

Name Craig Gunderson

Email craig.gunderson@savills.com

Response Type Agent / Consultant

On behalf of: Savills (UK) Ltd

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 Not Answered

Explanation Not Answered

Customer Ref: 00362 Response Ref: ANON-KU2U-GPR6-6  
Name: Craig Gunderson  
Response Type: Agent / Consultant  
On behalf of: Savills (UK) Ltd

Supporting Info: Yes  
Email: craig.gunderson@savills.com

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**  
The proposed changes sought within the Choices for City Plan 2030 relating to the delivery of purpose-built student housing will have a detrimental effect on the delivery of new developments in this sector across Edinburgh in the future – beyond those built for or managed by one of the Universities or Colleges. A significant number of new schemes over the past decade have been delivered by the private sector without University or College involvement. As such, this has generated a considerable amount of investment and economic activity in the city while providing much needed new accommodation for the rising number of students attending higher education institutions in the city. The provision of private sector purpose-built student housing has provided the city with more choice and assisted in making Edinburgh a more attractive place in which to study.<sup>2.39</sup> Introducing the policy changes proposed will result in a moratorium on private sector purpose-built student housing development. It is concerning that responsibility for the delivery and management of student housing is to be under the sole control of Universities and Colleges who may not have the will or resources to facilitate the required levels of development to sustain sufficient growth in this sector. One spin off benefit of private sector led purpose-built student development has been the number of mainstream properties freed up for use which were previously occupied by students. Notwithstanding, curtailing the ability for the private sector to deliver purpose-built student housing will likely result in mainstream residential properties returning to occupation by students. The requirement to deliver housing (both market and affordable) as part of the mix is particularly rigid and inflexible. Each site should be assessed on its own merits and a judgement made whether or not it is acceptable to provide both within the same site. Importantly, introducing the requirement for the increased affordable housing provision (up from 25% to 35%) and a restriction on the number of studios (to 10%) will affect the financial viability of future developments whether private sector led or University/College led. For the reasons outlined above Savills do not agree with the approach set out above in Issue 10A and strongly advise this is revised as matters progress to ensure purpose-built student housing can be delivered to meet growing demand.



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Choice **10 B**

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

Short Response

**Explanation** Savills are of the view that the requirement for all non-allocated commercial sites coming forward over 0.25ha to include at least 50% housing is particularly rigid and inflexible. Each site should be assessed on its own merits and a judgement made whether or not it is acceptable to provide both within the same site. This sentiment applies to student housing, hotels, retail and other commercial business developments. Savills do not support this policy proposal as currently structured.

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** Savills are supportive of measures to increase flexibility in commercial centres to accommodate alternative uses such as housing provision which can complement the existing retail offer and utilise available land to create sustainable mixed use communities within the urban area.

Customer Ref: 00362      Response Ref: ANON-KU2U-GPR6-6  
Name: Craig Gunderson  
Response Type: Agent / Consultant  
On behalf of: Savills (UK) Ltd

Supporting Info: Yes  
Email: craig.gunderson@savills.com

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: Not Answered

**Explanation**      Savills recognises that affordability is a particular challenge in parts of Edinburgh compared with other cities and authorities in Scotland and that, in some instances, it is important to address this issue with revised policy requirements. In addition, we fully support the delivery of affordable homes and acknowledge the important resource they provide. However, we note that the Council is striving towards delivering more affordable homes and our concern is that a requirement for all sites of 12 or more units to deliver an affordable housing provision of 35% may result in certain schemes becoming unviable. In essence, rigidly increasing the affordable housing provision may ultimately result in residential developments not being built, with neither market or affordable homes being constructed. We therefore submit that, in relation to affordable housing, additional wording is included within any policy requirement for 35% affordable housing to ensure viability concerns can be considered on a site by site basis (if need be). This would allow flexibility to be applied in certain circumstances to ensure the delivery of much need market and affordable housing is realised.

Choice      11 B

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

Short Response: Not Answered

**Explanation**

Customer Ref: 00362      Response Ref: ANON-KU2U-GPR6-6  
Name: Craig Gunderson  
Response Type: Agent / Consultant  
On behalf of: Savills (UK) Ltd

Supporting Info: Yes  
Email: craig.gunderson@savills.com

Choice 12 A

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

Short Response: Option 3 (Blended)

**Explanation**

The Council outline in the Choices document that the forthcoming City Plan 2030 needs to allocate sufficient land to ensure the required homes can be delivered in Edinburgh within the Plan period. Choices therefore seeks to determine how many homes are required, who will deliver these homes and where the homes will be delivered in a sustainable manner. In terms of how many homes are required, Choices sets out two options for a housing target, as follows:

- i. Preferred Option: 43,000 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HNDA 2 Wealth Distribution Scenarios less completions between 2012 and 2019.
- ii. Alternative Option: 52,800 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HNDA 2 Wealth Distribution Scenario less completions between 2012 and 2019.

It should be noted that both options fall some way short of meeting the identified housing need and demand in full. The Preferred Option would meet just 65% of identified housing need and demand in the HNDA 2 Wealth Distribution Scenario, once completions to 2019 are accounted for. The Alternative Option would meet 79% of identified need and demand in the HNDA 2 Wealth Distribution Scenario or 65% of the Strong Economic Growth Scenario. In order to provide sufficient housing land to deliver the required number of houses, the Council sets out three options to deliver this land, as follows:

- 1. Option 1 – Delivery by the Council and its partners within the Urban Area;
- 2. Option 2 – Delivery through market housing by releasing Greenfield land;
- 3. Option 3 – Use a blended approach of Option 1 and 2.

Savills is fully supportive of the reuse of brownfield land within the urban area to contribute towards the identified housing targets, though recognises that greenfield release will also be required in order to meet housing targets in a market facing manner. As such, a blended approach (Option 3) will be required. Indeed, the deliverability of a number of the brownfield sites identified in the accompanying City Plan 2030 Housing Study seems unlikely. There is a lack of information presented about the identified sites including whether the owner is potentially interested in selling or developing the site. The delivery of the identified brownfield land relies on the operation of existing businesses or public sector organisations ceasing, with residential development creating a land value in excess of the current use value. Suitable incentives will also be required to ensure landowners are willing to sell. Consequently, the Council's Option 1 to deliver the necessary housing target in full on the identified brownfield sites seems unachievable. Moreover, the lead in time for many of the sites identified, even if they are under single ownership and can be viably developed, will be significant. Reference is made to Compulsory Purchase Orders (CPO). However, the use of these powers can be complex, with such actions taking time to resolve on account of the varying associated obstacles to be addressed before purchase can be completed. The costs and logistics of running multiple contentious CPOs simultaneously will likely be prohibitive, ultimately impacting the delivery of many of the identified brownfield sites in Choices within the plan period. It is reasonable to assume many of these sites have previously been considered by private developers and have not yet come forward. We consider that a collaborative, infrastructure first approach as advocated in emerging policy and guidance should, as a matter of critical importance, be applied to prospective housing sites in the Edinburgh region. In addition, the option to maintain a variety in housing type should be maintained. Savills Edinburgh have concern that the proposals will mean that too many flats will be built and that this approach is unresponsive to market demand. In summary, we support the blended approach but with the caveat that actual housing land allocations may need to be re-examined and added to following a collaborative analysis of effectiveness and deliverability involving

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Choice **12 B1**

Short Response

Explanation

Choice **12 B2**

Short Response

Explanation

Choice **12 B3**

Short Response

Explanation

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Choice **12 B4**

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

Short Response

Explanation

Choice **12 B5**

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

Short Response

Explanation

Choice **12 B6**

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

Short Response

Explanation

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Choice **12 B7**

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

Short Response

Explanation

Choice **12 B8**

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

Short Response

Explanation

Choice **12 B9**

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

Short Response

Explanation

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Choice **12 B10**

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

Short Response

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

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

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Response Type

On behalf of:

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



Customer Ref:  Response Ref:

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Choice **13 A**

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

Short Response

Explanation

Choice **14 A**

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

Short Response

Explanation

Choice **14 B**

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

Short Response

Explanation

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On behalf of:

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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

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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** The Edinburgh Commercial Needs Study (ECNS) undertook a high level, broad brush analysis of retail deficiencies for the City of Edinburgh. This report concluded that, for the City as a whole: "The convenience retail capacity study suggests that Edinburgh is currently well endowed with supermarkets and discount foodstores generally. The scope for servicing additional new convenience floorspace over and above the current consents will mostly be in the form of trade diversion from existing stores, rather than reliance on spare capacity. This situation still presents opportunities to improve the quality, range and choice of existing convenience stores generally." Notwithstanding, it is questionable as to the weight that can be afforded to the ECNS. Firstly, it was not prepared as a Development Management tool but to provide background information for the preparation of the LDP. Secondly, it has not been the subject of any consultation (with the wider Choices for City Plan 2030 consultation only now taking place). The ECNS identifies five separate catchment 'zones' across the whole of Edinburgh. The boundaries drawn are arbitrary 'zones' and have no relationship to retail and leisure expenditure patterns nor any specific retail development catchment or defined Centre. The current policy test to address retail deficiencies is clearly concerned with the catchment area of a proposal. There is no suggestion in the ECNS that the identified 'zones' are appropriate catchment areas for any particular retail or leisure proposal (due to their scale). In considering a proposal for new retail or leisure development, the 'zones' identified in the ECNS should not be viewed as appropriate given the distinct need to assess the (local) catchment area of the proposal which could be significantly smaller than the identified 'zones' in the ECNS. Assessment of Deficiencies As noted above, the boundaries used for the ECNS zones do not relate to retail and leisure expenditure patterns nor any specific retail development catchment or defined Centre and the existence of very high levels of expenditure flows between different 'zones'. The quantitative analysis that was undertaken in the ECNS did not consider quantitative or qualitative deficiencies within local catchments, instead being based on five broad 'zones' within the City (see Section 7 and Table 7.1). For instance, Zone 2 takes in an extensive area containing several catchments and vastly different and distinct areas of West Edinburgh (Ravelston, Blackhall, Craighleith etc.), Inverleith, Canonmills, Granton, Pilton and Leith, stretching as far west as Restalrig and Seafield in the East. It is not reasonable or credible to apply these conclusions in a blanket fashion to planning application proposals, and assume that all residents in these broad 'zones' have equal access. Moreover, the quantitative 'over provision' across this whole area argued by the ECNS can largely be explained by the slower than expected progress of new housing across the Waterfront, whereby, for example, an extensive Morrisons superstore (which at UK National Averages would have a turnover of c. £40m) was effectively delivered ahead of the anticipated housing. Clearly, this historic delivery issue is however changing, with several new housing developments now on site (from the 132 unit Link 'Plot 27' site to the 388 unit CALA development at Ocean Terminal/Waterfront Plaza) or recently consented/programmed in (e.g. 938 unit Forthside development at Western Harbour), with 'infrastructure first' proposals now advancing to facilitate the delivery of c. 3,500 new homes in Granton (from 2022/23 to 2037). Notwithstanding, an assessment of City-wide retail capacity does not assist in assessing whether or not there are significant quantitative retail deficiencies within any local area within the City. Therefore,

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the ECNS only provides limited information that can be used for assessing whether or not a development does, or does not, address quantitative retail deficiencies (as indicated in the policy tests). The current policy tests are entirely correct to focus on whether or not there are deficiencies within the catchment area of the development proposal and not arbitrarily defined parts of the City. As such – and in line with the provision of the current LDP – a finer grain analysis reflecting the reality of local catchments is required to allow development management decisions to be sufficiently informed when assessing proposals for new retail and leisure developments. For the reasons outlined above Savills do not agree with the approach set out above in Issue 15B and strongly advise this is revised as matters progress.

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

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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

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Response Type   
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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** Savills welcome the Council's aim to continue to support office uses at strategic office locations including the city centre, but have concerns with placing too much emphasis on locations at Edinburgh Park/ South Gyle, the International Business Gateway and Leith to deliver substantial new levels of office floor space. These peripheral locations do not have the same level of occupier demand as the city centre, with many occupiers wanting to be located within the city centre where people live. The Council predict a requirement of new office floorspace over the next 10 years of c.2.7 million sq.ft. in the city centre and c.1 million sq.ft. elsewhere in the city. Given the changing working environment across all businesses, with more 'hot desking' and spread of 'agile working', we consider that this office floor space requirement can be considered on the high side. Employers no longer require the same levels of new floorspace for employees as they once did.

Choice 16 A2

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

Short Response

**Explanation** While Savills would be pleased to see a more relaxed policy approach that would allow office development at commercial centres, we would question how this may work in practice and consider that there may not be strong occupier demand in these locations.

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Supporting Info

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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** While Savills are aware of the high demand for new office floorspace within the city centre, we consider that some locations within the city centre will be more suitable to office development than others. As such, we would request that any future mixed use planning submissions are considered on their own merits, rather than the Council enforcing a 'blanket policy' requiring a certain percentage of any mixed use development for office floorspace. A blanket approach would only further serve to stagnate the office market, with some mixed use schemes becoming financially unviable.

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** We would be happy to see continued support for office development in other accessible locations elsewhere in the urban area, however would note that this will only supply a small amount of new office floorspace.

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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



Customer Ref: 00362 Response Ref: ANON-KU2U-GPR6-6  
Name: Craig Gunderson  
Response Type: Agent / Consultant  
On behalf of: Savills (UK) Ltd

Supporting Info: Yes  
Email: craig.gunderson@savills.com

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: I support no change

Explanation: Savills support no change to the current LDP Policy EMP 9 Employment Sites and Premises. While we appreciate that office floorspace has been lost to alternative uses such as hotels and student accommodation within the city centre, the office floorspace lost is generally older low grade stock which has limited demand for new occupiers in any case. Savills do not support a blanket policy approach requiring office accommodation to be included in any redevelopment of office buildings. A blanket policy approach will create not only potentially create operational issues but also impact the financial viability of potential redevelopment schemes. This would have knock on effects with developers and occupiers looking for opportunities elsewhere in the UK, meaning the associated significant investment in to the Edinburgh economy being lost. Should the Council still seek to pursue this policy, we would request that they include criteria to allow greater flexibility to be applied, assessing redevelopment schemes on a case by case basis.

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: Not Answered

Explanation:

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Name   
Response Type   
On behalf of:

Supporting Info

Email

Choice 16 E2

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

Short Response

Explanation

Choice 16 E3

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

Short Response

Explanation

Choice 16 E4

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

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

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Choice 16 E5

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

Short Response

Explanation

Choice 16 E6

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

Short Response

Explanation

Choice 16 E7

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

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 E8

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

Short Response

Explanation

Choice 16 EX

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

Short Response

Explanation

Choice 16 F

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

Short Response

Explanation

Customer Ref:  Response Ref:   
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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

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# Choices for City Plan 2030

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Savills Edinburgh Office Response



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## 1. Introduction

- 1.1. The document below sets out Savills Edinburgh response to the Choices for City Plan 2030 Main Issues Report.
- 1.2. The response provides Savills opinion on the relevant 16 choices that the Council have outlined. We have sought to evidence our representation using our experience and expertise from across the property market spectrum. We hope this is a constructive approach which can be used to assist in the preparation of the Proposed Plan and on to the final adopted City Plan 2030.
- 1.3. Savills have operated in the Edinburgh market for nearly 40 years and therefore have significant experience in property services including - building surveying, in and out of town retail, office agency, investment; planning, rural, valuation, residential letting and development. In addition, Savills wider Scotland offices also have experience of the energy and utilities markets.
- 1.4. As with other property focussed firms, Savills experience of the facets of the property market is considered useful in the preparation of the City Plan 2030 because significant change is proposed and the market has to be guided through this change. Our office has seen significant changes before, such as the 2008 financial crash, and we are currently in the midst of another such shock in the form of the COVID-19 pandemic. We hope that the representation below can assist City of Edinburgh Council in how best to consider the choices put forward so that a) sustainable economic growth can continue to flourish in Edinburgh and b) the market can be best prepared to react to significant change, particularly in the context of recovery from the effects of COVID-19. In doing this, we hope to contribute to the protection of existing jobs and businesses, and the creation of new ones.
- 1.5. We also respond as citizens of Edinburgh - citizens who live and work in the city, or travel to and from the city for work from the wider city region. We want Edinburgh to respond to the climate emergency and we want the best possible quality of life for existing and prospective residents of the city, as well as those who travel to and from the city for work, education and leisure.
- 1.6. City Plan 2030 will be critical to Edinburgh over the next 10 years and there is unprecedented change to consider. We commend City of Edinburgh Council's Main Issues Report for its boldness in responding to these challenges. Our overall message is that we consider it is crucial for the Council to work with all partners, including the private sector, to work through these respective challenges for the benefit of all moving forward.



## 2. Response

2.1. We structure our respective responses below as per the questions set out within the City Plan 2030 Choices document. The exception to this is a general point on the timescales for the adoption of City Plan 2030.

### ***General: timescales***

2.2. Savills do have concern that the timescales put forward in terms of the Local Development Plan review steps are extremely tight given the magnitude of the changes within respective choices that are put forward.

2.3. Notwithstanding the COVID-19 pandemic, which surely means that the timescales have to be revisited in any case, we are concerned that the changes will not be subject to full, collaborative engagement and as a result there is a risk that a) the Examination process will be overloaded with objection and the Reporter(s) will be left to adjudicate on issues that would be better debated across the city's respective stakeholders and b) there will not be sufficient time for the market to react to significant change and that this will bring unnecessary stress to the market at a time where there is already huge challenges to consider - COVID-19, Brexit, struggling retail brands to name a few.

2.4. It is understandable to review and adopt a new Development Plan to avoid the uncertainty of the current Development Plan currency expiring. However, we consider that it would be pragmatic for the Council to consider how best to allow for fuller engagement given the unprecedented change affecting the city and market at this time, even if this does mean a period of time when the currency of the current Plan has run out.

2.5. The new Planning (Scotland) Act, Placemaking Principle, Infrastructure Commission for Scotland report and Housing to 2040 consultation paper, all mention collaborative working as key to delivery of successful places in Scotland. As a result, where significant changes are proposed, in the context of an economic crisis we consider that ample engagement is absolutely critical.

2.6. We would propose that the Council disseminate the responses received and consider a further MIR consultation period post COVID-19 restrictions. This would mean delaying the Proposed Plan to 2021, and adoption of the final City Plan 2030 to an appropriate time thereafter.

### ***1A Green Network***

2.7. Savills Edinburgh support the connection of places, parks and green spaces as part of a wider green network. We consider this brings significant placemaking, amenity and quality of life benefits to existing and prospective citizens of Edinburgh and the wider city region.

### ***1B All Development to include green and blue infrastructure***

- 2.8. In principle, Savills Edinburgh support the provision of green and blue infrastructure in all development. However, we would call for a proportional and flexible policy that allows respective developers to respond to the respective site that they are dealing with.
- 2.9. In addition, it should be made clear in the formulation of the above policy as to what the Council will support in terms of green and blue infrastructure when adoption of the maintenance of such assets or the particular specification is controlled by separate legislation/regulations. In addition, health and safety legislation must be a consideration when outlining what green and blue infrastructure is permissible.
- 2.10. We are aware of circumstances in development sites across Scotland where one solution in one Planning Authority area is not supported in another area, for example a road-side swale. To allow developers to operate their businesses effectively in the delivery of buildings (and to contribute to economic growth) certainty is key. We consider City of Edinburgh Council could make their expectations clear in detailed policy in due course, this could be done in collaboration with respective developers.
- 2.11. The provision of green and blue infrastructure will play a part in the wider delivery of a site, for example in terms of a drainage solution for surface flood water. As a result, formulation of policy should also consider Scottish Water and SEPA's input, as well as the collaboration with the development industry outlined above. We consider this collaborative approach is in line with emerging national policy and guidance.

### ***1C Identify areas for future water management***

- 2.12. In principle, Savills Edinburgh support the identification of green/blue water corridors to help mitigate climate change.
- 2.13. As per our point for 1B, we consider detailed policy should be formulated via a collaborative approach with relevant stakeholders and the development industry to allow consistency and certainty in future water management measures on development sites.

### ***1D Circumstances for development of poor quality or underused open space***

- 2.14. In principle, Savills Edinburgh support the Council's stated aim to provide more detail on when poor quality or underused open space might be considered acceptable.
- 2.15. We are aware that there are a number of parties interested in the development of such land for a variety of purposes
- 2.16. We await further detail from City of Edinburgh Council to allow full consideration of this matter.

### ***1E 'extra-large greenspace standard'***

- 2.17. We consider that the aim is laudable, however at a holistic level we have a number of concerns:

- It is unclear as to whether there is a threshold in terms of a development size (unit numbers) at which point the proposed 5 hectares of open space would be expected?
- It is unclear how 5ha of open space would be provided for new developments if these are to be focused on the urban area, is there enough land when all competing pressures are considered?
- The provision of such a level of open space could create a significant burden on prospective development in terms of adverse impact on viability and/or charges to residents for factoring?

### ***2A Building standards***

- 2.18. Savills Edinburgh see the intention to promote sustainable new buildings, however we have concerns that building regulations and planning are being mixed and that this may hold up planning consent unnecessarily.

### ***2A Density***

- 2.19. Savills supports the aspiration to ensure the efficient use of land. Notwithstanding, Savills are of the view that the requirement to introduce a minimum density for housing development mechanistically (65 dwellings per hectare) within both the urban area and greenfield sites needs to be carefully considered as to whether it is achievable and if it will deliver beneficial results.
- 2.20. A vertical mix of uses may be appropriate in some locations, however, any policy provision would need to be realistically applied. Care needs to be taken that policies on increased density and vertical mixes are not a substitute for allocating sufficient land for the development needs of the city
- 2.21. Savills understands views are being sought on the following:
1. A minimum density of at least 65 dwellings per hectare for all housing development.
  2. A minimum density of 100 dwellings per hectare in currently unspecified locations which are identified for 'higher density development'.
  3. A policy on vertical mix of uses.

### ***Minimum density of 65 dwellings per hectare***

- 2.22. Firstly, grouping brownfield and greenfield sites into similar density requirements poses challenges. Brownfield sites require very little supporting infrastructure increasing the available developable site area for housing. By contrast, greenfield sites require new roads, footpaths, recreation spaces, SUDS infrastructure and landscape buffers reducing the developable area. It is therefore, inadequate to apply this mechanistic minimum broadly across all housing developments.
- 2.23. In terms of current suburban development densities, Greendykes South has been analysed which is a development site being progressed by Taylor Wimpey located in the south-east of the city. The development will comprise 59% terraces, 34% apartments and 7% being a mix of detached and semi-detached housing. This is viewed as a particularly high density suburban development but only equates to

60 dwellings per hectare. As such, this would not meet the minimum density requirements being proposed in Issue 2B.

- 2.24. Likewise, sites nearby Greendykes South, such as Edmonstone and Shawfair are expected to deliver significantly below the minimum density requirements proposed at c. 30-40 dwellings per hectare. It should be noted that these two sites are predominantly detached and semi-detached houses being delivered.
- 2.25. Following on from this, if this mechanistic requirement is required there will likely be undesirable consequences. The mix of house types being delivered will be substantially reduced as extensive quantum's of flats and terraced housing will be necessary to meet minimum densities.
- 2.26. Consequently, the minimum density requirements proposed will have significant implications for the suburban residential market, making traditional market family housing delivery more difficult. In turn, this could bring increased pressure on the pricing of houses as the proposed densities will result in the delivery of larger quantities of apartments to meet minimum requirements. The availability of semi-detached and detached family housing will likely fall due to requirements for increased housing density within proposed developments with the market price of these housing types increasing.
- 2.27. As such, these proposals could make it harder for individuals to purchase or rent accommodation that meets their needs. The supply of new housing for families will be limited, whether they be detached or semi-detached, on suburban sites. The unintended impacts of this shift in policy goes against one of the fundamental principles of the Choices for City Plan 2030 which is to ensure Edinburgh is a 'a city in which everyone lives in a home which they can afford'
- 2.28. Savills supports the efficient use of land but raises concerns that the current proposals will do this at the expense of providing a variety of homes for people to live in. The application of a mechanistic minimum density would be contrary to the aims of SPP which states:

*"Planning can help to address the challenges facing the housing sector by providing a positive and flexible approach to development." (para. 109)*

and

*"The planning system should: have a sharp focus on the delivery of allocated sites embedded in action programmes, informed by strong engagement with stakeholders." (para. 110)*

*A minimum density of 100 dwellings per hectare in specific locations*

- 2.29. Savills does not object to identifying certain locations for higher density development, notwithstanding, this should be done in consultation with those promoting development in these locations.

### *Requiring a vertical mix of uses*

- 2.30. Some locations may be suitable for a vertical mix of uses, such as town centre sites where there is high footfall. Locational requirements need to exist from commercial occupiers whose operations can complement residential uses.
- 2.31. Overall, we are supportive of ensuring development makes efficient use of available land for housing, notwithstanding, we do not agree with the requirement for a significant shift in minimum densities across the city on urban and greenfield housing sites. There needs to be a realisation that delivering the identified densities (65 dwellings per hectare) across the city on all sites is not achievable and could result in serious implications for the delivery and affordability of housing going forward in Edinburgh impeding the Council's ambitions to deliver a considerable number of homes over the plan period.

### **4A Place Briefs**

- 2.32. Savills Edinburgh are supportive of collaborative working and the production of Place Briefs. Indeed, we consider that this is in line with emerging policy and guidance. A collaborative approach allows for all issues to be identified at an early stage and this can significantly improve the finished development and give certainty to all parties involved.
- 2.33. However, it is absolutely critical that all stakeholders, including the private sector, are involved in creating a Place Brief for a respective site. Without this interaction there is concern that expectations will be raised in communities and the reality of the site will not be conveyed. For example, consideration must be made of constraints that affect a site, drainage, contamination etc. In addition, without considering the actual landowner in a Place Brief it would be unclear as to how much weight a Place Brief could hold.
- 2.34. Effective placemaking and an infrastructure first approach, as advocated by emerging policy and guidance, requires all interested parties to collaborate. We consider this is a better approach to development because parameters can be set and better, more realistic results can still be achieved.

### **4B Local Place Plans**

- 2.35. Savills are supportive of the development of Local Place Plans and the input of Edinburgh residents into the development of their locale is to be encouraged because the development that results should be of a higher quality.
- 2.36. We appreciate that the Planning (Scotland) Act is bringing forward Local Place Plans, and that they are new as a result. However, we consider that it should be remembered that all stakeholders in a respective area should have opportunity to put forward their view. In doing this, documents will be more robust and better reflective of an area's diversity.

### ***10A Purpose-built student housing***

- 2.37. The proposed changes sought within the Choices for City Plan 2030 relating to the delivery of purpose-built student housing will have a detrimental effect on the delivery of new developments in this sector across Edinburgh in the future – beyond those built for or managed by one of the Universities or Colleges.
- 2.38. A significant number of new schemes over the past decade have been delivered by the private sector without University or College involvement. As such, this has generated a considerable amount of investment and economic activity in the city while providing much needed new accommodation for the rising number of students attending higher education institutions in the city. The provision of private sector purpose-built student housing has provided the city with more choice and assisted in making Edinburgh a more attractive place in which to study.
- 2.39. Introducing the policy changes proposed will result in a moratorium on private sector purpose-built student housing development. It is concerning that responsibility for the delivery and management of student housing is to be under the sole control of Universities and Colleges who may not have the will or resources to facilitate the required levels of development to sustain sufficient growth in this sector.
- 2.40. One spin off benefit of private sector led purpose-built student development has been the number of mainstream properties freed up for use which were previously occupied by students. Notwithstanding, curtailing the ability for the private sector to deliver purpose-built student housing will likely result in mainstream residential properties returning to occupation by students.
- 2.41. The requirement to deliver housing (both market and affordable) as part of the mix is particularly rigid and inflexible. Each site should be assessed on its own merits and a judgement made whether or not it is acceptable to provide both within the same site.
- 2.42. Importantly, introducing the requirement for the increased affordable housing provision (up from 25% to 35%) and a restriction on the number of studios (to 10%) will affect the financial viability of future developments whether private sector led or University/College led.
- 2.43. For the reasons outlined above Savills do not agree with the approach set out above in Issue 10A and strongly advise this is revised as matters progress to ensure purpose-built student housing can be delivered to meet growing demand.

### ***10B Housing required on non-allocated sites over 0.25ha***

- 2.44. Savills are of the view that the requirement for all non-allocated commercial sites coming forward over 0.25ha to include at least 50% housing is particularly rigid and inflexible. Each site should be assessed on its own merits and a judgement made whether or not it is acceptable to provide both within the same site. This sentiment applies to student housing, hotels, retail and other commercial business developments. Savills do not support this policy proposal as currently structured.

### ***10C Out-of-centre retail units and Commercial Centres to potentially accommodate housing***

- 2.45. Savills are supportive of measures to increase flexibility in commercial centres to accommodate alternative uses such as housing provision which can complement the existing retail offer and utilise available land to create sustainable mixed use communities within the urban area.

### ***11A. Increase the provision of affordable housing requirement from 25% to 35%***

- 2.46. Savills recognises that affordability is a particular challenge in parts of Edinburgh compared with other cities and authorities in Scotland and that, in some instances, it is important to address this issue with revised policy requirements. In addition, we fully support the delivery of affordable homes and acknowledge the important resource they provide. However, we note that the Council is striving towards delivering more affordable homes and our concern is that a requirement for all sites of 12 or more units to deliver an affordable housing provision of 35% may result in certain schemes becoming unviable. In essence, rigidly increasing the affordable housing provision may ultimately result in residential developments not being built, with neither market or affordable homes being constructed.

- 2.47. We therefore submit that, in relation to affordable housing, additional wording is included within any policy requirement for 35% affordable housing to ensure viability concerns can be considered on a site by site basis (if need be). This would allow flexibility to be applied in certain circumstances to ensure the delivery of much need market and affordable housing is realised.

### ***12A and 12B Building our new homes and infrastructure***

- 2.48. The Council outline in the Choices document that the forthcoming City Plan 2030 needs to allocate sufficient land to ensure the required homes can be delivered in Edinburgh within the Plan period. Choices therefore seeks to determine how many homes are required, who will deliver these homes and where the homes will be delivered in a sustainable manner.

- 2.49. In terms of how many homes are required, Choices sets out two options for a housing target, as follows:
- i. Preferred Option: 43,000 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HNDA 2 Wealth Distribution Scenarios less completions between 2012 and 2019.
  - ii. Alternative Option: 52,800 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HNDA 2 Wealth Distribution Scenario less completions between 2012 and 2019.

- 2.50. It should be noted that both options fall some way short of meeting the identified housing need and demand in full. The Preferred Option would meet just 65% of identified housing need and demand in the HNDA 2 Wealth Distribution Scenario, once completions to 2019 are accounted for. The Alternative Option would meet 79% of identified need and demand in the HNDA 2 Wealth Distribution Scenario or 65% of the Strong Economic Growth Scenario.

- 2.51. In order to provide sufficient housing land to deliver the required number of houses, the Council sets out three options to deliver this land, as follows:



- Option 1 – Delivery by the Council and its partners within the Urban Area;
- Option 2 – Delivery through market housing by releasing Greenfield land;
- Option 3 – Use a blended approach of Option 1 and 2.

- 2.52. Savills is fully supportive of the reuse of brownfield land within the urban area to contribute towards the identified housing targets, though recognises that greenfield release will also be required in order to meet housing targets in a market facing manner. As such, a blended approach (Option 3) will be required.
- 2.53. Indeed, the deliverability of a number of the brownfield sites identified in the accompanying City Plan 2030 Housing Study seems unlikely. There is a lack of information presented about the identified sites including whether the owner is potentially interested in selling or developing the site. The delivery of the identified brownfield land relies on the operation of existing businesses or public sector organisations ceasing, with residential development creating a land value in excess of the current use value. Suitable incentives will also be required to ensure landowners are willing to sell. Consequently, the Council's Option 1 to deliver the necessary housing target in full on the identified brownfield sites seems unachievable.
- 2.54. Moreover, the lead in time for many of the sites identified, even if they are under single ownership and can be viably developed, will be significant. Reference is made to Compulsory Purchase Orders (CPO). However, the use of these powers can be complex, with such actions taking time to resolve on account of the varying associated obstacles to be addressed before purchase can be completed. The costs and logistics of running multiple contentious CPOs simultaneously will likely be prohibitive, ultimately impacting the delivery of many of the identified brownfield sites in Choices within the plan period
- 2.55. It is reasonable to assume many of these sites have previously been considered by private developers and have not yet come forward.
- 2.56. We consider that a collaborative, infrastructure first approach as advocated in emerging policy and guidance should, as a matter of critical importance, be applied to prospective housing sites in the Edinburgh region.
- 2.57. In addition, the option to maintain a variety in housing type should be maintained. Savills Edinburgh have concern that the proposals will mean that too many flats will be built and that this approach is unresponsive to market demand.
- 2.58. In summary, we support the blended approach but with the caveat that actual housing land allocations may need to be re-examined and added to following a collaborative analysis of effectiveness and deliverability involving relevant stakeholders.

### ***15A Town Centre First***

- 2.59. Savills are supportive of the continuation of the national 'town centre first approach'.



### ***15B Edinburgh Commercial Needs Study involvement in Development Management***

- 2.60. The Edinburgh Commercial Needs Study (ECNS) undertook a high level, broad brush analysis of retail deficiencies for the City of Edinburgh. This report concluded that, for the City as a whole: *“The convenience retail capacity study suggests that Edinburgh is currently well endowed with supermarkets and discount foodstores generally. The scope for servicing additional new convenience floorspace over and above the current consents will mostly be in the form of trade diversion from existing stores, rather than reliance on spare capacity. This situation still presents opportunities to improve the quality, range and choice of existing convenience stores generally.”*
- 2.61. Notwithstanding, it is questionable as to the weight that can be afforded to the ECNS. Firstly, it was not prepared as a Development Management tool but to provide background information for the preparation of the LDP. Secondly, it has not been the subject of any consultation (with the wider Choices for City Plan 2030 consultation only now taking place). Thirdly, the ECNS has not been tested through any examination.
- 2.62. The ECNS identifies five separate catchment ‘zones’ across the whole of Edinburgh. The boundaries drawn are arbitrary ‘zones’ and have no relationship to retail and leisure expenditure patterns nor any specific retail development catchment or defined Centre.
- 2.63. The current policy test to address retail deficiencies is clearly concerned with the catchment area of a proposal. There is no suggestion in the ECNS that the identified ‘zones’ are appropriate catchment areas for any particular retail or leisure proposal (due to their scale).
- 2.64. In considering a proposal for new retail or leisure development, the ‘zones’ identified in the ECNS should not be viewed as appropriate given the distinct need to assess the (local) catchment area of the proposal which could be significantly smaller than the identified ‘zones’ in the ECNS.

### *Assessment of Deficiencies*

- 2.65. As noted above, the boundaries used for the ECNS zones do not relate to retail and leisure expenditure patterns nor any specific retail development catchment or defined Centre and the existence of very high levels of expenditure flows between different ‘zones’. The quantitative analysis that was undertaken in the ECNS did not consider quantitative or qualitative deficiencies within local catchments, instead being based on five broad ‘zones’ within the City (see Section 7 and Table 7.1).
- 2.66. For instance, Zone 2 takes in an extensive area containing several catchments and vastly different and distinct areas of West Edinburgh (Ravelston, Blackhall, Craighleith etc.), Inverleith, Canonmills, Granton, Pilton and Leith, stretching as far west as Restalrig and Seafield in the East. **It is not reasonable or credible to apply these conclusions in a blanket fashion to planning application proposals, and assume that all residents in these broad ‘zones’ have equal access.** Moreover, the quantitative ‘over provision’ across this whole area argued by the ECNS can largely be explained by the slower than expected progress of new housing across the Waterfront, whereby, for example, an extensive Morrisons superstore (which at UK National Averages would have a turnover of c. £40m) was effectively delivered ahead of the anticipated housing. Clearly, this historic delivery issue is however changing, with several new housing developments now on site (from the 132 unit Link ‘Plot 27’ site to the 388 unit CALA development at Ocean Terminal/Waterfront Plaza) or recently consented/programmed in (e.g. 938 unit

Forthside development at Western Harbour), with 'infrastructure first' proposals now advancing to facilitate the delivery of c. 3,500 new homes in Granton (from 2022/23 to 2037).

- 2.67. Notwithstanding, an assessment of City-wide retail capacity does not assist in assessing whether or not there are significant quantitative retail deficiencies within any local area within the City. Therefore, the ECNS only provides limited information that can be used for assessing whether or not a development does, or does not, address quantitative retail deficiencies (as indicated in the policy tests). The current policy tests are entirely correct to focus on whether or not there are deficiencies within the catchment area of the development proposal and not arbitrarily defined parts of the City.
- 2.68. **As such – and in line with the provision of the current LDP – a finer grain analysis reflecting the reality of local catchments is required to allow development management decisions to be sufficiently informed** when assessing proposals for new retail and leisure developments. For the reasons outlined above Savills **do not agree** with the approach set out above in Issue 15B and strongly advise this is revised as matters progress.

### ***15E Hotel provision in retail centres***

- 2.69. Savills are supportive of measures to increase flexibility in centres to accommodate alternative uses such as hotels which can complement the existing retail offer.

### ***15F Leisure provision to be permitted within Commercial Centres***

- 2.70. Savills are supportive of measures to increase flexibility in centres to accommodate alternative uses such as leisure provision which can complement the existing retail offer and ensure prominent space is not left unoccupied for prolonged periods.

### ***16A.1 Strategic office locations***

- 2.71. Savills welcome the Council's aim to continue to support office uses at strategic office locations including the city centre, but have concerns with placing too much emphasis on locations at Edinburgh Park/ South Gyle, the International Business Gateway and Leith to deliver substantial new levels of office floor space. These peripheral locations do not have the same level of occupier demand as the city centre, with many occupiers wanting to be located within the city centre where people live.
- 2.72. The Council predict a requirement of new office floorspace over the next 10 years of c.2.7 million sq.ft. in the city centre and c.1 million sq.ft. elsewhere in the city. Given the changing working environment across all businesses, with more 'hot desking' and spread of 'agile working', we consider that this office floor space requirement can be considered on the high side. Employers no longer require the same levels of new floorspace for employees as they once did.

### ***16A.2 Office development at commercial centres***

- 2.73. While Savills would be pleased to see a more relaxed policy approach that would allow office development at commercial centres, we would question how this may work in practice and consider that there may not be strong occupier demand in these locations.

### ***16A.3 City centre to provide significant office floorspace within major mixed-use developments***

- 2.74. While Savills are aware of the high demand for new office floorspace within the city centre, we consider that some locations within the city centre will be more suitable to office development than others. As such, we would request that any future mixed use planning submissions are considered on their own merits, rather than the Council enforcing a 'blanket policy' requiring a certain percentage of any mixed use development for office floorspace. A blanket approach would only further serve to stagnate the office market, with some mixed use schemes becoming financially unviable.

### ***16A.5 Office development in other accessible locations elsewhere in the urban area***

- 2.75. We would be happy to see continued support for office development in other accessible locations elsewhere in the urban area, however would note that this will only supply a small amount of new office floorspace.

### ***16B Identify sites and locations within Edinburgh with potential for office development***

- 2.76. We support the identification of new sites within Edinburgh for office development. Notwithstanding, we would request that any future designations are 'market informed' based on current requirements and demand. Savills Office Agency team would be happy to assist the Council to help inform these designations due to their knowledge and expertise in this area.

### ***16C Loss of office policy to retain accessible office accommodation***

- 2.77. Savills support no change to the current LDP Policy EMP 9 Employment Sites and Premises. While we appreciate that office floorspace has been lost to alternative uses such as hotels and student accommodation within the city centre, the office floorspace lost is generally older low grade stock which has limited demand for new occupiers in any case.
- 2.78. Savills do not support a blanket policy approach requiring office accommodation to be included in any redevelopment of office buildings. A blanket policy approach will create not only potentially create operational issues but also impact the financial viability of potential redevelopment schemes. This would have knock on effects with developers and occupiers looking for opportunities elsewhere in the UK, meaning the associated significant investment in to the Edinburgh economy being lost.
- 2.79. Should the Council still seek to pursue this policy, we would request that they include criteria to allow greater flexibility to be applied, assessing redevelopment schemes on a case by case basis.



### ***16G. Protect industrial estates that are designated under our current policy Emp 8***

2.80. Should the Council still seek to pursue this policy, we would request that they include criteria to allow greater flexibility to be applied, assessing redevelopment schemes on a case by case basis.

2.81. Policy Emp 8 Business and Industry Areas only permits development falling within Classes 4, 5 or 6. Going forward, we would request that the policy includes criteria to allow greater flexibility to be applied to take on board current market conditions and assess schemes with alternative uses on a case by case basis.

### ***16H New policy that provides criteria for goods distribution hubs***

2.82. Savills support the introduction of a specific policy to guide the development of goods distribution hubs.

### 3. Conclusions

- 3.1. Savills welcome the opportunity to engage with the production of City Plan 2030. We share Edinburgh Council's ambition for Scotland's capital and its residents, both those existing and those who will be attracted to move here.
- 3.2. The document is bold and this is understood and commended. There are significant challenges to respond to, with climate change most pressing.
- 3.3. We have been active within Edinburgh's diverse property market for over nearly 40 years, through ups and downs. Unfortunately we are now in the midst of the biggest economic challenge that we have seen for the Edinburgh market, indeed we are in unprecedented times.
- 3.4. We hope that our representation can be read in the context of our diverse market experience. We have sought to identify what we think will work, what raises significant difficulty and what we think requires further thought. As requested, we have justified our commentary/opinion with evidence and we have also referenced additional policy justification.
- 3.5. Overall, it is important that City of Edinburgh Council do not seek too much too soon. The city market will need time to recover and as such the Council and key stakeholders must strike a balance to support its citizens in terms of economic opportunity and in relation to creation of successful places. Private sector advice should be actively sought to assist with working towards this appropriate balance alongside the Council and stakeholders, Savills would be happy to continue to engage as a result.

**Alastair Wood**  
Director

+44 (0) 131 247 3700  
AWood@savills.com

**Debbie Mackay**  
Director

+44 (0) 131 247 3700  
DMackay@savills.com