

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **1 A**

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

Short Response

Explanation

Choice **1 B**

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

Short Response

Explanation

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

Supporting Info
Email

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

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

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

Supporting Info
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: Response Ref:
Name
Response Type
On behalf of:

Supporting Info
Email

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 This submission is made in respect of an existing investment property at Rennie's Isle, Leith. The site is located at the northern tip of Rennie's Isle to the north east of Victoria Quay. It lies (just) outside the Shore Conservation Area. A number of data sources were used as part of the council's urban brownfield site assessments including the Scottish Vacant and Derelict Land Survey, current planning permissions and refusals, information on building and use typologies and local knowledge used in the search for sites. A minimum size threshold of 0.05 hectares was applied. As an actively used but under-utilised site Rennie's Isle was not specifically identified or assessed as an opportunity. However, it is located within Assessment Group 1 - North Leith area. North Leith has a medium to high potential to accommodate housing development. The site also lies just outside the Revised Leith Strategic Business Centre and is at the boundary of high density and medium density residential areas (although the northern port and dock fringe is not an area of dense development at present). The MIR recognises that other brownfield sites may come forward within the urban area (which have been identified as having a low potential for development) and therefore not included in the final total capacity calculation, or that have not been identified through the study. The council recognises that some sites will be brought forward before the plan reaches its adoption stage. Rennie's Isle is located within an area with good potential to accommodate new housing development. The site sits (just) outside the proposed Leith Strategic Business Centre - this being a location where the council will seek to promote and support proposals for modern new business and industrial development. Union Property Services Ltd support the aspirations of the MIR to prioritise the delivery of its housing land requirements through the re-use of urban, brownfield land. The subject site is effective and can be delivered in the short-term to assist the council's proposed housing delivery programme as set out in the MIR and retain commercial uses and active frontages to complement surrounding land uses. As part of the wider waterfront regeneration area it is capable of accommodating significant density of development and deliver affordable housing.

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **2 C**

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

Short Response

Explanation

Choice **2 D**

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

Short Response

Explanation

Choice **3 A**

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

Short Response

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

Customer Ref: Response Ref:

Name

Supporting Info

Email

Response Type

On behalf of:

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

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

Supporting Info
Email

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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 City Plan 2030 seeks to plan for a city in which residents don't need to own a car to move around. To achieve this the plan will provide for new homes, jobs and amenities and services in accessible neighbourhood locations with good access to walking and cycling routes and to public transport. This is also closely related to the council's desire to reduce carbon emissions. The council will seek to ensure that there is investment in community infrastructure commensurate with the development aspirations of the plan. Union Property Services support that car use should be discouraged in locations accessible by a choice of means of transport.

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

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

Supporting Info
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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Supporting Info
Email

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: Response Ref:

Name

Supporting Info

Email

Response Type

On behalf of:

Choice **9 B**

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

Short Response

Explanation

Choice **10 A**

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

Short Response

Explanation

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

Customer Ref: 01723 Response Ref: ANON-KU2U-GPVQ-5

Name: Robert Evans

Response Type: Agent / Consultant

On behalf of: Union Property Services Ltd

Supporting Info:

Email: robert.evans@ryden.co.uk

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: Not Answered

Explanation: Not Answered

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

Supporting Info
Email

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 Edinburgh is a growing city with a critical need for more homes, particularly affordable housing. The MIR proposes three potential delivery options for the new homes that are needed across the plan period. A key theme throughout those options is a desire to utilise urban, brownfield land to deliver the (majority of) housing requirements. In seeking to demonstrate the merits of this approach, the council has highlighted those areas of the city and sites considered as having the potential to contribute to the housing delivery programme. The City Plan Housing Study, January 2020 identifies mechanisms to deliver new homes and provides an assessment of urban brownfield and greenfield sites. The council's high-level assessment of urban brownfield land essentially identifies locations as well as specific sites with potential for housing. The preferred approach to delivering new homes is for the council to bring forward these urban brownfield sites in conjunction with other public sector partners. However, the plan recognises this approach may not be financially viable or possible for the council to achieve, given the scale of delivery required annually. This approach will require a significant step change in the delivery of urban land in Edinburgh. It also may require the council to use compulsory purchase powers. On this basis, housing delivery will need to start immediately (in 2020) to enable the council and its partners to deliver 17,600 units with an annual delivery rate of 3,340 units per year to prevent the release of market-led green belt land. Union Property supports the council's approach to delivery of high-density housing on existing urban, brownfield sites to allow the provision of affordable housing although the increase from 25% to 35% is not explained in sufficient detail. The level of provision of affordable housing requires to be set against realistic assessment of viability. Ultimately, this will impact upon land value and/or purchase price of private housing. The latter could have a more polarising effect on the affordability if costs are passed on to buyers at the point of sale. Delivering urban brownfield redevelopment sites often includes uncertainty associated with development costs and abnormalities such as ground conditions, contamination and utilities/ infrastructure capacity constraints. Developer contributions required for transport, education and health facilities will also impact on viability overall and the ability to deliver significant levels of affordable housing.

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

Supporting Info
Email

Choice 11 B

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

Short Response

Explanation

Choice 12 A

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **12 B1**

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

Short Response

Explanation

Choice **12 B2**

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

Short Response

Explanation

Choice **12 B3**

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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:

Name

Response Type

On behalf of:

Supporting Info

Email

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **14 C**

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

Short Response

Explanation

Choice **15 A**

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

Short Response

Explanation

Choice **15 B**

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

Short Response

Explanation

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

Supporting Info
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: Response Ref:

Name

Supporting Info

Email

Response Type

On behalf of:

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:

01723

Response Ref:

ANON-KU2U-GPVQ-5

Supporting Info

Name

Robert Evans

Email

robert.evans@ryden.co.uk

Response Type

Agent / Consultant

On behalf of:

Union Property Services Ltd

UNION
PROPERTY SERVICES

Ryden

**RENNIE'S ISLE
EDINBURGH**

REPRESENTATION TO CITY PLAN 2030
– MAIN ISSUES REPORT

ON BEHALF OF
UNION PROPERTY SERVICES LTD

APRIL 2020

CONTEXTUAL NARRATIVE

Union Property Services Ltd own a site at Rennie’s Isle, Port of Leith, Edinburgh that is currently occupied as commercial offices. The site is located just west of the historic swing bridge and sits at a prominent location on an axis with the northern end of Ocean Terminal, the consented hotel site adjacent and the Skyliner blocks that have recently been granted planning permission. The site is under-utilised and could accommodate a significant built form to provide a mix of commercial, work, and residential space consistent with core policy objectives of City of Edinburgh Council.



UNION PROPERTY SERVICES

Union Property Services is a privately owned land and property development, management and investment business. The portfolio extends from Cheshire to Northumberland with a particular focus in the North East of England of high quality commercial investments.



Investments include a range of property including offices, retail and leisure establishments, business park and industrial properties and significant land holdings.



Union Property Services Ltd is committed to working in partnership with local stakeholders and employing local staff and companies.



Euston Road Development
London, £300m



Euston Road Development
London, £300m

Union promotes development that is sustainable and contributes to the environmental credentials of their estate. The Group is one of the largest investment and development businesses in the North East, with a land and property bank in excess of £400 million and is keen to invest in Edinburgh.



Mella Inside
Newcastle Quayside, £20m



Mella Inside
Newcastle Quayside, £20m

RENNIE'S ISLE, LEITH

This submission is made in respect of an existing investment property at Rennie's Isle, Leith.

The site is located at the northern tip of Rennie's Isle to the north east of Victoria Quay. It lies (just) outside the Shore Conservation Area.



The MIR recognises that other brownfield sites may come forward within the urban area (which have been identified as having a low potential for development) and therefore not included in the final total capacity calculation, or that have not been identified through the study.

The council recognises that some sites will be brought forward before the plan reaches its adoption stage.

Rennie's Isle is located within an area with good potential to accommodate new housing development.

The site sits (just) outside the proposed Leith Strategic Business Centre - this being a location where the council will seek to promote and support proposals for modern new business and industrial development.

CITY PLAN ASSESSMENT

A number of data sources were used as part of the council's urban brownfield site assessments including the Scottish Vacant and Derelict Land Survey, current planning permissions and refusals, information on building and use typologies and local knowledge used in the search for sites.

A minimum size threshold of 0.05 hectares was applied.

As an actively used but under-utilised site Rennie's Isle was not specifically identified or assessed as an opportunity. However, it is located within Assessment Group 1 - North Leith area.

North Leith has a medium to high potential to accommodate housing development.

The site also lies just outside the Revised Leith Strategic Business Centre and is at the boundary of high density and medium density residential areas (although the northern port and dock fringe is not an area of dense development at present).



The extant City of Edinburgh LDP 2016 identifies the subject site within the Central Leith Waterfront policy allocation (EW1b) which provides support for a range of alternative uses including residential and entertainment and leisure within a mixed-use development format.

The Main Issues Report (MIR) for City Plan 2030 identifies a preference for urban, brownfield land across the city to be used to deliver the council's housing requirement.

Union Property Services Ltd support the aspirations of the MIR to prioritise the delivery of its housing land requirements through the re-use of urban, brownfield land.

The subject site is effective and can be delivered in the short-term to assist the council's proposed housing delivery programme as set out in the MIR and retain commercial uses and active frontages to complement surrounding land uses.

As part of the wider waterfront regeneration area it is capable of accommodating significant density of development and deliver affordable housing.

The current Edinburgh Local Development Plan includes the site under Edinburgh Waterfront: Central Leith Waterfront (EW 1b). This allocation includes three specific LDP policy references, namely Hou 1, Ret 7 and Del 3.

- Policy Hou 1 Housing Development confirms that priority will be given to new housing proposals under a set of specific criteria, one of which includes mixed use regeneration proposals at Edinburgh Waterfront.
- Policy Ret 7 Entertainment and Leisure Developments - Preferred Locations advises that planning permission will be granted for high quality, well designed arts, leisure and entertainment facilities and visitor attractions in the City Centre, at Leith and Granton Waterfront and in a town centre.
- Policy Del 3 Edinburgh Waterfront - planning permission will be granted for development which will contribute towards the creation of new urban quarters at Leith Waterfront and Granton Waterfront.

The policy framework set by the extant LDP is supportive of a mix of uses including residential.

CITY PLAN CHOICES 2030 (MIR)

The MIR sets out a number of key policy priorities and a series of alternatives.

Those key principle issues include promoting;

- A sustainable city which supports everyone's physical and mental wellbeing.
- A city where you don't have to own a car to move around.
- A city in which everyone lives in a home which they can afford.
- A city where everyone shares in its economic success.

This representation supports core policy objectives for redevelopment of brownfield sites to provide residential-led mixed-use regeneration.

This requires development at appropriate density to provide viable development options for existing brownfield sites and to encourage the provision of affordable housing.

Making Edinburgh a sustainable and connected city

City Plan seeks to create a sustainable and healthy city capable of contributing to the delivery of a carbon neutral city by 2030. It proposes to create a network of greenspaces that protects the city's green setting and helps people make sustainable travel choices.

New places should be of the highest quality and contribute to existing communities. To meet climate change ambitions, the design and use of low and zero-carbon generating technologies should be prioritised in all developments.

The plan seeks to promote a higher density of development to achieve a more efficient use of land resources, including the promotion of a vertical mix of uses.

Union Properties supports promoting higher densities in urban areas a vertical mix of uses (extract of indicative density map below with Rennie's Isle highlighted).



A city where you don't need your own car to move around

City Plan 2030 seeks to plan for a city in which residents don't need to own a car to move around. To achieve this the plan will provide for new homes, jobs and amenities and services in accessible neighbourhood locations with good access to walking and cycling routes and to public transport.

This is also closely related to the council's desire to reduce carbon emissions. The council will seek to ensure that there is investment in community infrastructure commensurate with the development aspirations of the plan.

Union Property Services support that car use should be discouraged in locations accessible by a choice of means of transport.

A city in which everyone lives in a home they can afford

Edinburgh is a growing city with a critical need for more homes, particularly affordable housing.

The MIR proposes three potential delivery options for the new homes that are needed across the plan period. A key theme throughout those options is a desire to utilise urban, brownfield land to deliver the (majority of) housing requirements. In seeking to demonstrate the merits of this approach, the council has highlighted those areas of the city and sites considered as having the potential to contribute to the housing delivery programme.

The City Plan Housing Study, January 2020 identifies mechanisms to deliver new homes and provides an assessment of urban brownfield and greenfield sites.

The council's high-level assessment of urban brownfield land essentially identifies locations as well as specific sites with potential for housing.

The preferred approach to delivering new homes is for the council to bring forward these urban brownfield sites in conjunction with other public sector partners.

However, the plan recognises this approach may not be financially viable or possible for the council to achieve, given the scale of delivery required annually. This approach will require a significant step change in the delivery of urban land in Edinburgh.

It also may require the council to use compulsory purchase powers. On this basis, housing delivery will need to start immediately (in 2020) to enable the council and its partners to deliver 17,600 units with an annual delivery rate of 3,340 units per year to prevent the release of market-led green belt land.

Union Property supports the council's approach to delivery of high-density housing on existing urban, brownfield sites to allow the provision of affordable housing although the increase from 25% to 35% is not explained in sufficient detail.

The level of provision of affordable housing requires to be set against realistic assessment of viability.

Ultimately, this will impact upon land value and/or purchase price of private housing. The latter could have a more polarising effect on the affordability if costs are passed on to buyers at the point of sale.

Delivering urban brownfield redevelopment sites often includes uncertainty associated with development costs and abnormals such as ground conditions, contamination and utilities/ infrastructure capacity constraints.

Developer contributions required for transport, education and health facilities will also impact on viability overall and the ability to deliver significant levels of affordable housing.

City Mobility Plan - Draft January 2020

The City Mobility Plan (Plan), which supersedes Edinburgh's Local Transport Strategy 2014-2019, provides a strategic framework for the safe and effective movement of people and goods around Edinburgh up to 2030. This is closely aligned with City Plan 2030 and its core priorities underpin relevant objectives within the latter document.

The Mobility Plan considers how best to plan for new development and confirms the need to ensure that it helps to reduce the dominance of motor vehicles and makes walking, cycling and public transport the obvious travel choices for the people in them.

SUMMARY

Union Property supports the council's aspiration to deliver new high-density housing and mixed use development and affordable housing on urban brownfield land.

The Rennie's Isle site is effective and can be delivered in the short-term consistent with these core policy objectives and can contribute to a vibrant new wave of development at Edinburgh's waterfront.

The potential of the wider waterfront area should be acknowledged in terms of urban form and density of development and Rennie's Isle included as a higher density area in Map 2.

Informal pre-application discussion with senior officers is ongoing and will inform the design team brief for the site.



Our proposed change:

A We want our new homes to be delivered by the Council and its partners within the Urban Area.

We want City Plan to avoid the unnecessary use of greenfield land and build our new communities on brownfield land, at a better density, reducing the need to travel, supported by active and public transport. Our proposed approach minimises the amount of new homes we need to build to reach our affordable housing target, with no green belt release.

However, it must be recognised that this approach may not be financially viable for the Council and its partners to deliver or, possible for the Council to achieve an annual delivery rate to prevent the release of further green belt land. This is because:

- This approach will require a significant step change in the delivery of urban land in Edinburgh. The proposed approach will require joint ventures with our partners and commercially, with the option of compulsory purchase where required, to deliver on 275 hectares of current employment land for housing led mixed use development.
- An urban area approach would require new, and significant changes to existing infrastructure - schools, healthcare and transport, including at least four new primary schools, primary school extensions and two new high schools. Catchment changes will also be considered in areas where there is insufficient spare capacity at a school to accommodate pupils from new housing development.
- Delivery will need to start immediately (in 2020) to enable the Council and its partners to deliver 17,600 units with an annual delivery rate of 3,340 units per year to prevent the release of market-led green belt land.
- Of the 275 hectares of the potential urban land sites, only 11 hectares is vacant land ready for development, 30 hectares has planning consent (but with a lower % of affordable housing) and the remainder is currently in use as employment land, which includes land for small businesses and land owned by the MOD, Police, and NHS Lothian.

- The Council will need to provide business land as part of urban area mixed use sites and elsewhere, and work with existing users to find new premises, or provide new premises as part of the redevelopment.

Instead of making this change:

B We could use a greenfield approach – instead we could release enough from the Green Belt and identify the supporting infrastructure to meet the market and affordable housing targets, as a market-developer led approach.

We could let market housing deliver the new affordable homes we need. However, it must be recognised that an approach which uses market housing to deliver affordable housing will require new greenfield land for 27,900 units. This is because through a market approach, building one affordable home, requires roughly two market homes to be built.

However, it must be recognised that:

- Business as usual greenfield release is simply not an option to meet our overarching climate change commitment.
- A greenfield approach would require significant new infrastructure – schools, healthcare and transport to deliver it, including 13 new primary schools and 5 high schools, including a new high school for Kirkliston and Wester Hailes. Catchment changes will also be considered in areas where there is insufficient spare capacity at a school to accommodate pupils from new housing development.
- There is also a significant risk in using a market housing/greenfield approach as it would require a delivery rate of 4,600 homes a year, far higher than the 2,500 a year we recently been achieving in Edinburgh. This could result in further unplanned market greenfield release to ensure that new homes come forward.
- Our latest assessment of housing need and demand (HND2) indicates that there is not sufficient market demand to deliver this level of housing.

CITY PLAN 2030

Choice 11 - Delivering more affordable homes

Edinburgh is a growing city. However, there are inequalities within our communities and entrenched areas of poverty and disadvantage. We want everyone in Edinburgh to be able to live in an affordable home.

We define Affordable Housing as housing that is for sale or rent, to meet the identified needs of people who cannot afford to buy or rent housing generally available on the open market.

The Council has committed to delivering 20,000 affordable homes in the next 10 years. To help deliver the target, the Council and its partners are working to deliver more homes.

- We currently build affordable homes in two ways:
- Half through the Council's own affordable housing programme, and

Half by requiring market housing developments to deliver 25% percent of their sites for affordable housing. In simple terms, this means that to deliver one affordable home through the affordable housing policy, three market homes need to be built.

We want to deliver our 20,000 affordable homes in the most efficient way, within mixed sustainable communities, whilst minimising green belt release. To do this we think it is time to change our affordable housing policy.

Our proposed change:

A We want to amend our policy to increase the provision of affordable housing requirement from 25% to 35%. All development, including conversions, which consist of 12 residential units or more must include provision for affordable housing amounting to 35% of the total units.

This policy will also apply to all land coming forward for other uses (as set out in Choice 10) i.e. where a site is required to deliver at least 50% housing, at least 35% of this housing must also be affordable.

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.

- The affordable housing should be tenure blind and should be a representative mix of the housing types and sizes which make up the total development
- All private and/or rented residential accommodation of more than 12 units will be expected to make an onsite affordable housing contribution, and
- Affordable housing units which will be owned or managed by a Registered Social Landlord through Affordable Housing Contracts must meet the RSL's design guidance and Social Rented homes will be expected to meet Housing for Varying Needs standards.

Instead of making this change:

C We could continue to use our current policy on affordable housing (Hou 6) which requires all housing sites to deliver 25% affordable housing and our non-statutory guidance and practise note.

Edinburgh Local Development Plan (2016) policies under revision:

Affordable Housing (Hou 6) and Housing Mix (Hou 2)

Choice 16 - Delivering Office, Business and Industry Floorspace

City Plan 2030 will need to ensure that we have enough business and industrial floorspace to meet the City's demand, ensuring we are replacing the city's ageing stock with modern estates/premises in the right place.

Supporting the office market

We know that there is strong demand for offices in the city centre, but there are limited sites for future development and demand is likely to continue.

Office development competes with high demand and high value land uses such as hotels and student accommodation. Loss of office floorspace has contributed significantly to reduced levels of supply, particularly in the city centre.

In addition to high profile headquarters, the city has a deep pool of businesses across the size ranges, with a skew towards smaller organisations. Most of the city's office market is mid-market in terms of locations, size and price. Access to public transport is a strong driver of demand.

- B We want to identify sites and locations within Edinburgh with potential for office development.
- 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.
- D Or we could introduce a 'loss of office' policy only in the city centre.

Our proposed change:

A 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.
- Support office development at commercial centres as these also provide accessible locations.
- Strengthen the requirement within the city centre to provide significant office floorspace within major mixed-use developments.
- Amend the boundary of the Leith strategic office location to remove areas with residential development consent.
- Continue to support office development in other accessible locations elsewhere in the urban area.

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