

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

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Choice 1 C

We want to identify areas that can be used for future water management to enable adaptation to climate change. Do you agree with this? - Yes / No

Short Response

Explanation

Choice 1 D

We want to clearly set out under what circumstances the development of poor quality or underused open space will be considered acceptable. Do you agree with this? - Yes / No

Short Response

Explanation

Choice 1 E

We want to introduce a new 'extra-large green space standard' which recognises that as we grow communities will need access to green spaces more than 5 hectares. Do you agree with this? - Yes / No

Short Response

Explanation

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Choice **1 F**

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

Short Response

Explanation

Choice **1 F**

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

Short Response

Explanation

Choice **1 G**

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

Short Response

Explanation

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Choice **1 H**

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

Short Response

Explanation

Choice **2 A**

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

Short Response

Explanation

Choice **2 B**

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

Short Response

Explanation

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Name Oliver Munden

Response Type Agent / Consultant

On behalf of: Unite Group PLC

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Choice 2 C

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

Short Response Not Answered

Explanation

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Choice **2 D**

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

Short Response

Explanation THE BELOW IS AN EXTRACT FROM THE SUBMITTED SUPPORTING REPRESENTATION DOCUMENTS. THESE SHOULD BE READ IN CONJUNCTION WITH THE BELOW EXTRACT.3.1Choice 2, change D requires all development, including student housing, to deliver quality open space and public realm which is useable for a range of activities, including drying space, whilst allowing for higher densities.3.2Position: Unite support this aim, however the standards for PBSA and housing should be different as the needs of the occupiers are different. It is therefore recommend that a definition for open space is included within policy to accommodate a variety of forms of amenity or open space. 3.3Reasoning: Within each Unite property, a variety of open and amenity spaces are included for student use. At Salisbury Court (St Leonards), internally the amenity spaces include a common room, study spaces and breakout/meeting rooms/spaces for student use, including a music room. Externally, there is a central courtyard and external garden spaces providing a variety of spaces for students. The internal areas however are not classed as open space, yet provide a similar function in that they provide spaces for students to use when not in their rooms or flats. However it is these internal spaces which help deliver an overall attraction to students over and above other types of accommodation such as HMO's, and as such should be considered as open space provision under such a policy.3.4The focus of the choice as currently written relates to outdoor spaces only, and does not include internal spaces. With a recognition within 'Choices' of differing accommodation types, including PRS which shares some of the character of amenity space with PBSA, it is important the plan recognises the variety of types of opens space required by all types of accommodation, and provides a policy position which does not adversely affect the development viability or density of a scheme against large amounts of external open space, which is not something that students require.3.5It is therefore requested that should such a policy be brought forward, there is a requirement within PBSA accommodation that a percentage of open/amenity space can be internal to a building, rather than simply external. Unite would be happy to take Council officials on a tour of their Salisbury Court building to demonstrate the spaces used by students, and would be willing to work with the Council to ensure a policy position is brought forward which allows the deliverability of PBSA with a mix of appropriately sized open and amenity spaces.

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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

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

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Choice **5 A**

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

Short Response

Explanation

Choice **5 B**

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

Short Response

Explanation

Choice **5 C**

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

Short Response

Explanation

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Choice **5 D1**

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

Short Response

Explanation

Choice **5 D2**

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

Short Response

Explanation

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

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Choice **6 A**

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

Short Response

Explanation

Choice **6 B**

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

Short Response

Explanation

Choice **7 A**

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

Short Response

Explanation

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Choice **7 B**

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

Short Response

Explanation

Choice **7 C**

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

Short Response

Explanation

Choice **7 D**

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

Short Response

Explanation

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Choice **8 A**

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

Short Response

Explanation

Choice **8 B**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

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Choice **8 C**

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

Short Response

Explanation

Choice **9 A**

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

Short Response

Explanation

Choice **9 B**

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

Short Response

Explanation

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Choice **10 A**

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

Short Response

Explanation

THE BELOW IS AN EXTRACT FROM THE SUBMITTED SUPPORTING REPRESENTATION DOCUMENTS. THESE SHOULD BE READ IN CONJUNCTION WITH THE BELOW EXTRACT.

2.1 Through Choice 10, CEC is proposing changes to its student housing policy. First and foremost, it is the view of Unite that any revision to the Council’s student housing policy should continue to recognise the need for and benefits of purpose built student accommodation. Secondly, student accommodation should be recognised as a specific form of housing which can help deliver the housing need within Edinburgh, as outlined as part of Choice 12. Additionally, PBSA can help free up existing housing stock currently occupied by students, notably within HMO properties, demonstrating that delivery of new housing is not the only way in which the housing target can be met. As we discuss below, delivery of PBSA can be a more efficient use of land that residential in terms of accommodating a larger number of people.

2.2 The current adopted Edinburgh City Local Plan states that “it is preferable in principle that student needs are met as far as possible in purpose built and managed schemes rather than the widespread conversion of family housing.” It goes on to state “increasing the amount of purpose built student accommodation assists the growth of universities and the attractiveness of the city as a centre for higher education”. City Plan 2030 must continue to fully support purpose built student accommodation and recognise these benefits.

2.3 Edinburgh has a thriving student population of over 76,000 students, comprising around 54,000 undergraduates and 22,000 postgraduates across four main higher education institutions - University of Edinburgh (UOE), Heriot-Watt University (HWU), Edinburgh Napier University (ENU) and Edinburgh College (EC). Choice 13 recognises the importance that Universities and Colleges help play in the economy of the city, in that the choice proposes a specific policy relating to support for these institutions. It therefore follows that policies which support these institutions and their operations, including student accommodation, should be brought forward, rather than a suggested policy position which would significantly restrict the delivery of student housing within the City. This would mirror other authorities elsewhere in the UK.

2.4 From our own research based on the City of Edinburgh’s Student Accommodation Survey 2018, the city currently has approximately 19,600 bed spaces, with a further 3,600 beds currently under construction or pending determination. If this full amount of student housing was delivered, it would equate to 23,200 bed spaces. This would provide PBSA for around 30% of the student population within the city, resulting in a large proportion of students relying on alternative types of accommodation, including HMO’s. This is particularly relevant given that around 40% of UOE students are from out with the UK and therefore typically rely on PBSA for occupation during their study. There is clearly a need for more purpose built student accommodation to be built in Edinburgh to meet the needs of student and relieve pressure on traditional family housing stock, which would be freed up through the delivery of PBSA.

2.5 Unite are of the opinion that planning policy should encourage a specific percentage of students to be accommodated within purpose built student accommodation (PBSA), as this would help free up other housing stock within the city. This is a position shared by CEC in a number of documents, notably at paragraph 235 of the adopted Local Development Plan (November 2016) which provides support to the current student housing policy of Hou8. A similar position was also reiterated in the committee presentation for an application for PBSA at Pentland House

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(ref 17/03675/FUL) where Council officials confirmed CEC's ambitions to deliver more student accommodation within the city to address the requirement for further provision.2.6As an example of where an independent government reporter has considered the requirement for PBSA, through the examination of Oxford's Core Strategy, a main modification was agreed between all parties. This amended a policy to state that now academic floorspace could be delivered unless there was sufficient student accommodation available to accommodate students generated by the increase in floorspace. This demonstrates the importance that student accommodation plays within a city with a substantial student population and that the city is encouraging students to be housed in PBSA rather than other forms of housing.2.7Further alterations were made to other Oxford policies, where the modification requires that applications for the demolition or change of use of existing PBSA will not be allowed unless a replacement provision is made with a reasonable length of time. This is to ensure sufficient supply of PBSA is available at any one time to accommodate the student population.2.8Likewise, a similar position has been taken within the adopted Bath Local Plan, where one of the key priorities for the plan, is the requirement to deliver sufficient PBSA to accommodate the rising student numbers in the city.2.9These examples demonstrate the importance of which universities play within their cities, with development plans providing a policy position which can assist in their growth. Within Edinburgh, a study undertaken in 2013/2014 (<https://www.ed.ac.uk/news/2015/150930-economicimpact>) identified that Edinburgh University provided a £2 billion boost to the Scottish economy, supporting over 30,000 jobs across the country, and that its students contribute around £177 million to the Scottish Economy. Looking at a wider context, the report also identifies that the university generates over £3.3 billion GVA for the UK economy, and £4.9 billion GVA worldwide. As another example, Heriot Watt also boasts strong economic credentials (https://warwick.ac.uk/research/warwickcommission/chancellorscommission/resources/secondary_research/heriot_watt_university_economic_impact_report.pdf), where a survey in 2012 identified that the university generates over £270 million GVA to the Scottish economy. It is therefore clear that universities can have a substantial impact on the economy and should therefore be supported, including policies regarding student accommodation for the reasons as set out within this representation.2.10Finally, sufficient supply of PBSA also helps ensure that two of the key aims of Choices can be met, namely "a sustainable city which supports everyone's physical and mental wellbeing" and "a city where everyone shares in its economic success". Unite believe it is important that CEC recognise the benefits which student accommodation can deliver. Proposed Change A2.11Whilst in principle, Unite welcomes a comprehensive policy position regarding the delivery of student housing, rather than the current position of policy Hou8 and non-statutory supplementary guidance (the latter which has not been subject to an independent assessment) they object to the proposed change outlined within Choice A. 2.12We have therefore responded to each criteria under Change A below. New purpose-built student accommodation to be located on a direct walking, cycling, or public transport route to its intended university or college.2.13Position: Unite object to the principle of the introduction of this policy wording, as it is ambiguous in its wording and could lead to PBSA being delivered in places where students do not want to live.2.14Reasoning: The location of student accommodation was identified as important to 95% of respondents to the 2018/2019 Student Accommodation Survey (<https://www.knightfrank.co.uk/research/knight-frank-ucas-student-housing-survey-201819-6002.aspx>) undertaken by Knight Frank in Partnership with UCAS, one of the highest percentages of reasons why students choose their accommodation. This research clearly highlights that student accommodation should be located where students want to live, rather than being located in places which comply with a strict and ambiguous policy position. A failure to provide accommodation where students wish to live simply means that they would choose to locate in other forms of accommodation, such as HMO's, which reduces the housing stock for families and does not provide the facilities which students look for. This would provide direct conflict with the aims of Choice 9 which seeks to avoid the loss of housing to other uses and would conflict the aim of Choices of "a city which everyone lives in a home they can afford". In addition, delivering student accommodation in locations where students do not wish to locate may result in bed spaces not being occupied, which would be

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an inefficient use of land and lead to empty buildings. The efficient use of land is something that the Council are seeking to improve, through such changes as those identified by Choice 2, which includes an increase in density requirements for new development.2.15A review of recent applications for PBSA as per page 55 of the Councils monitoring statement to support 'Choices', shows the location of new PBSA applications between 2014 and 2019, with the map on page 56 identifying the full PBSA provision across the city. The vast majority of these are located either in the city centre, or located on key arterial routes out of the city, or are located at or close to university campuses. They are all in locations well served by public transport, demonstrating that PBSA providers already locate where there is good public transport provision and that the location has clearly been considered acceptable otherwise the applications would have been refused.2.16The wording of this choice as currently drafted suggests that student accommodation should be located which is directly accessible by sustainable travel. The Oxford Dictionary definition of direct is "going in the straightest line between two points which stopping or changing direction" and the following example is provided "There's a direct train to Leeds (= it may stop at other stations but you do not have to change trains)." Indeed there is an opportunity to change the policy approach to state accommodation should be located which is well served by public transport, as this would provide significantly more flexibility and ensure accommodation is built where students wish to live. This is supported by a number of appeal decisions within the city for Student Accommodation notably Dundee Street (PPA-230-2208), Leith Walk (PPA-230-2274), Bernard Terrace (PPA-230-2122) and Unite St Leonards (PPA-230-2145). In each of these cases, the reporter found that whilst these sites did generally not sit adjacent or close to existing university or college campuses as required by the non-statutory student guidance, they all benefit from good public transport links, therefore complied with criteria a) of the current policy Hou 8. In specific regards to Dundee Street, the Council agreed that due to the large number of buses which pass the site, and the secure cycle parking proposed, the site benefited from good transport links. Not only this, but the DPEA Reporter found that the surrounding mix of uses which includes retail, leisure and entertainment supports the site as a sustainable location. Likewise, for the Leith Walk appeal, although this appeal was ultimately dismissed, the Reporter stated that the site is well served by public transport, with over 53 services per hour running close to the proposed location. Additionally, due to the nearby safeguarded tram route, there is "no evidence to suggest that these facilities [i.e. the proposed development] cannot be reached by public transport" and is therefore accessible by sustainable transport.2.17Based on these appeal decisions, it is clear that student accommodation is acceptable in locations which have good public transport provision to identified university campus locations. It is therefore requested that revised policy wording is prepared to provide support for PBSA where it is well located in terms of public transport accessibility to a university or college, as this is a position that has been considered acceptable through an independent review.To deliver market and affordable housing as part of the mix,2.18Under Choice 10, it is stated by CEC that "purpose built student housing, retail, leisure, hotels and other commercial developments, are being built often at the expense of creating strong and sustainable communities. We want sites coming forward for these uses to also deliver new housing".2.19Position: Unite are not adverse to the principle of student schemes delivering market and affordable housing as part of the mix, however this should only be required as part of larger development schemes and not simply applied as a blanket approach to all sites of 0.25ha or greater as proposed. Unite also consider that the desire to provide mainstream housing should not be at the expense of the delivery of other housing types, including student housing where there is also an identifiable need.2.20Reasoning: City Plan 2030 should recognise that purpose built student accommodation is also a form of housing and plays an important role in meeting the city's housing needs. This position is accepted elsewhere in the UK, notably within the English NPPF.2.21NPPF recognises student housing as a form of accommodation, where are paragraph 61 it states "the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)".2.22The proposed London Plan bases its student housing policy on this position, where it

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states: “the housing need of students in London whether in Purpose-Built Student Accommodation (PBSA) or shared conventional housing, is an element of the overall housing need for London” and that “new flats, houses or bedrooms in PBSA all contribute to meeting London’s housing need. The completion of new PBSA therefore contributes to meeting London’s overall housing need and is not in addition to this need. Every three student bedrooms in PBSA that are completed equate to meeting the same need that one conventional housing unit meets, and contribute to meeting a borough’s housing target”.^{2.23} In another example, the Exeter Adopted Core Strategy specifically states “purpose built student accommodation should be provided to meet the housing need”, and as discussed above, the modifications to Oxford’s development plan take an approach of PBSA being a requirement for new universities floorspace, in order that sufficient accommodation is provided for students. ^{2.24} On the basis of the above, CEC’s desire to provide mainstream housing should not be at the expense of the delivery of other housing types where there is also an identified need. A similar conclusion was reached in the recent appeal decision at Gorgie Road (PPA-230-2298) where the Reporter did not consider that there is a “clear justification for favouring housing over student accommodation on the appeal site” (paragraph 10).^{2.25} The policy should also positively support a variety of ways that market and affordable housing could be delivered as part of mixed use schemes alongside student accommodation, such as alongside other specialist forms of housing such as PRS and Co-living where there could be obvious synergies. Indeed, there is an opportunity that the affordable housing element can be met by percentage of student rooms being offered at discounted rents as more affordable accommodation to students. We consider each of these further below:^o Unite also believe there is an opportunity that such a policy position could also support the delivery of other types of housing in a mixed use scheme. Alongside PBSA this could also include PRS development or co-living, as typically these types of accommodation provision share similar characteristics with student accommodation in that they often provide shared amenity spaces, building services through a dedicated manager, and generally provide flexible living, i.e. residents may only stay a short period. Indeed, if a mix of residential accommodation types was supported by policy, this could deliver a high quantum of development within the same building due to the ability to share amenity spaces or common building services.^o Turning to Affordable Housing, Unite portfolio includes a variety of different accommodation styles, types and therefore prices. Whilst this is not a requirement of PBSA operators, it allows Unite to provide accommodation for the whole market. However, there is also an opportunity through policy to redefine what accommodation falls under Affordable Housing. Within the London Plan, there includes a policy regarding affordable student accommodation. This requires 35% of rooms to be affordable, at a rental level set by the Mayor, as well as a variety of other considerations. However the principle is that as London and NPPF recognises that PBSA is a form of housing, the delivery of Affordable housing as a part of PBSA is a recognised position. If a similar principle was adopted by CEC in the proposed Local Development Plan, it would help ensure their aim of “A city where everyone lives in a home they can afford” can be met. This would be similar to the position taken by CEC in regards to Private Rented Sector Accommodation (PRS), where within the Councils design guidance, it highlights that PRS will be expected to contribute 25% affordable housing (under current policy), tailored to meet the greatest housing need. The rental levels and conditions of the tenancy would be subject to legal agreement between the developer and the Council. This would help achieve proposed aim of City Plan for Edinburgh to be a “city which everyone lives in a home they can afford”. ^{2.26} As already outlined, Unite are not adverse to the delivery of mixed uses on sites, however this must be in locations where a mix of uses can justifiably take place, without comprising the requirements for one or more uses on the site. We have discussed this in more detail within our response to Choice B. However in summary:^o CEC should recognise the benefits of which PBSA can bring, and the support and services which that providers such as Unite can offer as part of their development. In order that these services can be provided, a minimum quantum of development of 300 bed spaces is required.^o Setting a minimum site size for a mix of uses is not a suitable methodology as there are a variety of considerations required to be taken account of in delivering new proposals. Alternative options should be considered.^o The current 0.25 ha criteria where sites should deliver a 50/50 split included within the non-statutory supplementary guidance has not been adhered to on the majority of schemes, and has been heavily criticised by DPEA

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reporters. 2.27 Whilst Unite consider a requirement to deliver a mix of uses to be acceptable, we urge the City of Edinburgh Council to consider this in further detail, through detailed studies, to define what a more appropriate threshold where a mix of uses is required would be. Unite would be willing to work with the Council in this regard. To be built for, and managed by, one of Edinburgh's universities or colleges and, 2.28 Position: Unite strongly object to this proposed requirement and consider it unjustified and anti-competitive. 2.29 Reasoning: Unite are unclear what the rationale is behind the proposal to only allow purpose built student accommodation which is built for and managed by one of the Universities and colleges. It has not been made clear what credentials CEC consider that universities and colleges have compared to purpose built student accommodation providers. It is the view of Unite that any operator who is part of a registered scheme such as the National Code of Standards for Student Accommodation (<https://www.nationalcode.org/>), (which includes Unite and a number of other PBSA providers) should also be able to operate PBSA within the city. Unite was one of the four founding members of the code in 2004, which sets out expectations relating to a range of issues involved with the operation of student accommodation such as management and safety standards. This national standard is a voluntary code which is supported by National Union of Students, and is managed by members from a wide variety of organisation including the Association of Colleges and Communities and Local Government. Whilst the code is open to all educational establishment PBSA providers, it is notable that there are no universities or colleges within Edinburgh which are part of this code. 2.30 Unite also question if universities and colleges have the resources and means to deliver sufficient student accommodation to meet the city's needs. Currently, the University of Edinburgh has a commitment to provide accommodation for all first year students from outside Edinburgh, and to all new single postgraduates. Likewise, Heriot Watt University and Edinburgh Napier University have a similar commitment for first year students. With University's principally meeting the accommodation needs of first year students only, restricting student schemes to those built and managed by universities could result in increasing numbers of second, third and fourth year students in particular being reliant on HMO's for accommodation. 2.31 We estimate that in Edinburgh, approximately 60% of the current PBSA supply is managed by a university or college. A substantial amount of PBSA is therefore operated by the Private Sector who currently operate around 40% of the total across the city. 2.32 Additionally, a number of student housing schemes which are built and managed by private operators have nominations agreements with Universities to provide accommodation to their students. By way of an example, Salisbury Court which was built and is managed by Unite has a nominations agreement with the University of Edinburgh to provide 97% of its bed spaces to UOE students. Due to this it is clear that the universities require support from the private sector in order to meet the demand for student accommodation across the city and this should be allowed to continue. 2.33 We have considered new PBSA supply across the city, which is either in the development pipeline, or recently constructed (last 5 years). Only a small number of these rooms have been delivered directly by and for a university, approximately 30%. This figure is swayed by a small number of large schemes which have been delivered by UOE and HW. In terms of UOE, approximately 1,000 new rooms were delivered at Holyrood in around 2016. HW also completed 750 bedrooms at their Riccarton Campus, however In this case, the accommodation related to replacement of older stock on campus which has now been demolished and did not represent a significant net gain in beds. Both of these are not regular occurrences, as demonstrated by limited delivery of new accommodation by universities in the few years prior to 2015. 2.34 This clearly demonstrates a need for private PBSA providers to provide accommodation alongside universities and colleges. We consider this need will continue and it should not be prevented, but encouraged by planning policy. 2.35 As also discussed under Choice B, Unite work extensively with their students and a number of organisations to help ensure that students who stay with Unite successfully integrate into the city. This is particularly important as according to a recent survey (<https://www.whatuni.com/advice/news/graduate-retention-best-uk-cities/82588/>), Edinburgh has the joint highest (alongside Glasgow) student retention rate in the UK with 51% of all students staying in the city when graduated. By comparison, the third placed city is London at 47% and fourth of Birmingham at 41%. 2.36 In order to help achieve and improve this, Unite are committed to work with all

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relevant organisations through their Homes for Success (<http://www.unite-group.co.uk/our-accommodation/home-success>) programme, which is built on working with:

- Universities and students - to make sure accommodation and services are the best fit with institutions, giving students a joined-up experience
- Employees - so that everyone working at Unite Students, from frontline people to board chairs, is motivated and focused on how best to create and constantly improve the student experience
- Investors - to generate crucial funding for high level accommodation and services. Unite Students does this by delivering sustainable, growing cash flows and consistent, low double digit returns to investors
- Neighbours and local authorities - to integrate accommodation into a town or city for the mutual benefit of students and local people

2.37 In addition, a key part of Unite's business model is their aim to deliver positive social impacts for all those who they work with. One of their flagship activities in this regard is their continued support of the Unite Foundation, a charity which provides accommodation scholarships for young people attending universities from challenging circumstances, often from a background of care or family challenges. 2.38 Alongside these activities, Unite provide support for local communities through the provision of facilities which benefit these communities. In Scotland, a planning application was recently approved (ref 19/04134/FUL) at Unite's Salisbury Court accommodation to allow the occupation of one of the long term vacant retail units to be utilised by a charitable organisation. The process of identifying an occupier is currently underway, in partnership with the Council. In other UK cities occupiers include "16-25 independent people", a charity that supports young people who are either homeless or at a risk of becoming so, and "MahaDevi Yoga", who are a charity that provide yoga to children with special needs. These activities help to demonstrate Unite's commitment to delivering a positive impact on the community, and would not be possible without their PBSA. The success of these schemes has also been highlighted by a recent Guardian article (https://www.theguardian.com/education/2019/dec/19/students-have-a-bad-name-how-cities-are-healing-the-town-v-gown-divide_), which specifically discusses these Unite programmes and the successful work Unite has been undertaking to successfully integrate students into the local community. Deliver a maximum of 10% studio flats. 2.39 Position: Unite are happy to support this position. 2.40 Reasoning: Delivering a maximum of 10% studios complies with Unite's business model which is generally to provide less than 10% studios. Unite wishes to provide a range of accommodation types in its developments and limiting the number of studios also allows its accommodation to remain more affordable, helping to deliver the aim within Choices of "a city in which everyone lives in a home which they can afford".

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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

THE BELOW IS AN EXTRACT FROM THE SUBMITTED SUPPORTING REPRESENTATION DOCUMENTS. THESE SHOULD BE READ IN CONJUNCTION WITH THE BELOW EXTRACT.

2.41 **Position:** Unite object to the introduction of a requirement for a mix of uses on sites over 0.25 hectares. Whilst the principle of requiring a mix of uses on sites is acceptable to Unite, the introduction of a figure, which does not appear to have any evidence base as to why such a level has been chosen is not supported. In addition, if a limit was to be introduced a 0.25ha size is too small. Indeed, Unite do not believe that simply applying a fixed site area is an appropriate way of requiring a mix of uses, as there are a large variety of site specific criteria and constraints which require consideration as part of any new development.

2.42 **Reasoning:** in principle, Unite do not object to the principle of introducing a mix of uses on sites over a certain size, however it is considered that basing this simply on hectarage is not sufficient to allow mixed use sites to come forward or be delivered.

2.43 **As an organisation,** within their accommodation, Unite provide student support on a range of issues and challenges faced by students at university through their dedicated onsite support staff as well as online. The support staff also works closely with university welfare teams to ensure consistent advice and provide direct contact with the people who can help most. This is undertaken alongside those activities outlined under Change A above.

2.44 **Consideration of various research pieces** outlining the student accommodation market across the UK should also be made. These include statistics regarding the key criteria which students look for when securing accommodation. In the recent 2018/2019 student accommodation survey undertaken by Knight Frank in partnership with UCAS, 96% of respondents identified quality of accommodation, 95% identified location, 92% identified facilities (including wi-fi, gym etc.) and 89% identified quality of furnishings as important reasons in their choice of accommodation. It is these facilities and support networks which are not as readily available within HMO's, and therefore should be encouraged through the delivery of good quality PBSA, such as those delivered by Unite.

2.45 **The delivery of student accommodation** has a fixed cost associated with it, which is the principle reason as to why a student operator such as Unite requires a minimum number of bed spaces. This includes everything from the requirement for student welfare and amenity areas, to the provision of staff, cleaning and shared spaces. As Unite are required to deliver these facilities across all of their sites, a smaller number of bedrooms with the same fixed costs would simply mean that room prices would rise. This would be contrary to the aims of the plan, notable 'A Sustainable city which supports physical and mental wellbeing' and 'a city in which everyone lives in a home which they can afford'. Therefore, a minimum of 300 beds is required within Unite's schemes. This is examined further within Option 3 of Appendix 1, which suggests a notional scheme of 5 storeys where 100% student accommodation could be delivered. However this scheme is not ideal, as it does not allow full compliance with amenity/open space provision, and an inability to provide sufficient parking (mandatory requirements such as accessible spaces) within the site. Whilst this suggests a site area of 0.33ha, in reality this would be a significantly compromised scheme which is unlikely to be deliverable by Unite.

2.46 **Therefore,** smaller sites would have viability issues prohibiting their delivery, and as such larger site sizes are required to allow more rooms and a reduction of rental costs, therefore more affordable.

2.47 **Additionally,** if small scales sites were required to include 50% of the net developable area as mainstream residential units, there is a high

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probability that many of these residential units would be converted to HMOs/occupied by students in unmanaged accommodation. The Council have already recognised within their non-statutory Student Housing Guidance the advantages of students living in purpose built well managed schemes than in HMOs/ the general housing stock. It must surely be better for the whole site to therefore be developed for well managed purpose built accommodation. Assessment of options: 2.48 Attached as Appendix 1 to this representation, an assessment has been completed by Allan Murray Architects (“AMA”) to consider the impact of delivering a 50/50 split between PBSA accommodation and for sale residential development, including the proposals to increase Affordable Housing provision to 35%. Options 1 and 2 of the attached demonstrate two separate sites of 0.25 ha outlining how a mix of uses would work on these sites. As can be seen at Option 1, a 0.25 ha site would only allow around 150 PBSA beds and 50 residential units, based on an average height of 5 storeys, whereas Option 2 would only allow 104 student beds and 34 residential units, again based on 5 storeys. Both of these options are severely compromised in that they do not allow sufficient amenity/open space, parking, DDA compliant parking and a lack of division between the two land uses. 2.49 To demonstrate a site area which would allow a sufficient quantum of development to allow a viable mixed use proposal, as well as inclusion of other required elements, option 5 provides further detail. The first stage in the creation of this option was to identify the minimum spaces required for a 50/50 split of uses based on a 300 bed minimum requirement. This exercise identifies that to accommodate all of the requirements, a 0.66ha area is required. Once these are placed as part of a realistic site area, based on a terrace infill site, the realistic site area required is 0.98ha. 2.50 From the assessments which AMA have undertaken, it clearly demonstrates that there are a wide range of issues and considerations which need to be addressed to deliver a mixed use scheme and that the characteristics of a site, such as shape and maximum height can have a significant impact on this. Therefore, simply setting a site area does not represent an appropriate way of ensuring a mix of uses can be delivered. Non-Statutory Guidance Review 2.51 Turning to the current Student Non-Statutory Guidance (February 2016), it is noted that this includes a provision for sites over 0.25 ha to deliver market housing as part of the mix. However, having reviewed planning applications which include student accommodation, very few schemes have been brought forward on larger sites with a mix of uses, let alone with a 50/50 split. Indeed, the guidance states that a 50/50 split should not be considered in isolation as there are other considerations required to be looked at. Some examples of mixed use schemes are outlined below, with the mix of floorspace identified in bold. 2.52 This table supports the work undertaken by AMA which outlines that a variety of site characteristics required to be considered. This is particularly noted when the Gorgie Road application and Westfield Road application are compared, where a site of 0.52ha could deliver 248 beds, and a 0.33 ha site could deliver 394 beds. THIS TABLE IS PROVIDED WITHIN THE SUBMITTED REPRESENTATION DOCUMENT 2.53 As identified under the notes section, those sites which do not comply with the 50/50 split do so for various reasons, including viability, change of use and other required uses on the site. It demonstrates a variety of determining factors has been considered elsewhere and that simply applying a 0.25 ha area is not the only consideration. 2.54 Most importantly, the majority of these sites are a way off the 0.25 hectare size identified in the guidance, suggesting that such a level is not appropriate and has stunted the development of student accommodation applications in the city, further compounding the lack of supply. 2.55 Particular note should be taken of those applications determined at appeal, as these have been determined by an independent party, and in most cases have not considered that the 0.25 ha included within the current Student Housing Guidance is appropriate. Purpose of Mix of Uses 2.56 We understand that the reasoning behind a requirement for a mix of uses is to assist in the delivery of housing which has been identified under choice 12. As we have already identified, student housing should be recognised as a type of housing within the city, and therefore its development can help deliver this housing requirement. This position is one which has already been accepted elsewhere in the UK, most notably through NPPF and the London City Plan. As such, as part of the assessment undertaken by AMA, a consideration was given to the number of residential units which could be delivered on each site when compared to student accommodation. The table assumes that 1 person would utilise one bed in PBSA and that a residential unit could accommodate 2.13 people. This is based on NRS data for Edinburgh, which identifies on average, each dwelling in

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Edinburgh accommodates 2.13 people. The table below provides a summary based on the options set out in Appendix 1 (OF SUBMITTED REPRESENTATION DOCUMENT): THIS TABLE IS PROVIDED WITHIN THE SUBMITTED REPRESENTATION DOCUMENT 2.57 As the above demonstrates, delivery of sites with 100% residential delivers significantly less population capacity than a 100% PBSA site, with a 50/50 split lying somewhere between. It is therefore clear that the delivery of PBSA is an efficient use of land and provides a greater amount of housing than a 100% residential scheme, contributing more to the city's housing targets and freeing up more HMO's for occupation by families. Conclusion 2.58 Based on the above, whilst Unite consider a requirement to deliver a mix of uses to be acceptable, they urge the City of Edinburgh Council to consider in detail, through detailed studies, what a more appropriate threshold where a mix of uses is required. Unite and their technical teams would be willing to participate in such studies to help ensure that a deliverable policy position comes forward. Providing an evidence base would also assist should such a proposal come through policy and at examination.

Choice **10 C**

We want to create a new policy promoting the better use of stand-alone out of centre retail units and commercial centres, where their redevelopment for mixed use including housing would be supported. Do you agree with this? - Yes / No

Short Response

Explanation

Choice **11 A**

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

Short Response

Explanation

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Choice **11 B**

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

Short Response

Explanation

Choice **12 A**

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

Short Response

Explanation

Choice **12 B1**

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

Short Response

Explanation

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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

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

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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

Not Answered

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

Not Answered

Explanation

Choice 12 B7

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

Short Response

Not Answered

Explanation

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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

Choice **12 B10**

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

Short Response

Explanation

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Choice **12 BX**

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

Short Response

Explanation

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

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Choice 12 C

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

Short Response

Explanation

Choice 12 D

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

Short Response

Explanation

Choice 13 A

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

Short Response

Explanation

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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

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

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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

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

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Choice 15 D

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

Short Response

Explanation

Choice 15 E

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

Short Response

Explanation

Choice 15 G

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

Short Response

Explanation

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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

Choice **16 A2**

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

Short Response

Explanation

Choice **16 A3**

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

Short Response

Explanation

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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

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

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Choice **16 B**

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

Short Response

Explanation

Choice **16 C**

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

Short Response

Explanation

Choice **16 E1**

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

Short Response

Explanation

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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

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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

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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

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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