

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 We are supportive of the CEC's ambition to create a sustainable city that improves health and wellbeing by providing access to green space and actively promoting walking and cycling while reducing unnecessary car travel. This aim aligns with our own strategy to create a sustainable estate that strengthens our sense of place and creates safe and sustainable connections between our buildings. An active travel route has been illustrated in close proximity to Peffermill Playing Fields. This area is home to our sports facilities with a range of outdoor and indoor sporting activities taking place on site. We would request further dialogue with CEC on the active travel route through Inch Park.

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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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 We are supportive of the CEC's ambition to create a sustainable city that improves health and wellbeing by providing access to green space and actively promoting walking and cycling while reducing unnecessary car travel. This aim aligns with our own strategy to create a sustainable estate that strengthens our sense of place and creates safe and sustainable connections between our buildings.

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 Creating safe and affordable accommodation, with good indoor and outdoor spaces, that allow students to interact and build community, is our key focus in the delivery of our accommodation portfolio.

Customer Ref: 01529 Response Ref: ANON-KU2U-GWDS-V
Name: Steven Poliri
Response Type: Organisation / Public Agency
On behalf of: University of Edinburgh

Supporting Info: Yes
Email: steven.poliri@ed.ac.uk

Choice 3 A

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

Short Response: Not Answered

Explanation

The University is supportive of CEC's aspiration as the University is on a similar journey to be net zero carbon by 2040, however we request that further consideration is given to the need to actively implement this choice. At present, a mechanism exists to ensure that new building projects comply with Scottish Government Carbon Targets. The Scottish Building Regulations, which are updated on a regular basis, provide the most appropriate forum for agreeing and setting the Energy and Carbon standards, and timeline for implementation, for the Construction Industry. Since 2010 significant uplifts in Carbon Targets have been made; in applying a secondary requirement via the planning application process there is a duplication of efforts and potential for confusion. The University's position is that the Scottish Building Regulations and guidance, provided via the Technical Handbooks, should continue to be the single mechanism for controlling the requirements relating to Energy and Carbon Targets for development projects. As noted, the University is on a similar journey and has committed to becoming net zero carbon by 2040. The University's Climate Strategy 2016 lays out the comprehensive institution approach to climate change mitigation and adaptation in order to achieve its targets. https://www.ed.ac.uk/files/atoms/files/web_view_-_climate_strategy_2016-2026_spreads.pdf To meet this target the University is developing an Energy Masterplan which sets out campus specific approaches to energy infrastructure investment. The plan is a long term programme of measures that seeks to address existing asset life, incremental reduction in heat network temperatures, energy demand minimisation, and the introduction of low carbon supply strategies. The University has identified 2040 as an achievable target date by carefully reviewing our capabilities to meet this date. Attempting to achieve a target date 10 years in advance of this places additional burdens on the University, and we have concerns that we, and our supply chain, may not be able to achieve this by 2022 when the proposed new City Plan would be adopted.

The University is not currently supportive of Choice 3 and has the following comments:

- Supportive of aspiration, but request that the Scottish Building Regulations and the regular updates to the Building Standards remain as the single mechanism for determining sustainability and energy standards for the construction industry.
- Not supportive of applying this to Listed and Historic Buildings as it would not be achievable whilst also retaining heritage and conversation elements of the properties.
- Not supportive of applying this to refurbishments or conversions unless clear guidance is provided on how to achieve energy and sustainability items in listed or existing buildings i.e. detailed in Building Standards Technical Handbook and Historic Environment Scotland Guidance.
- We are supportive of incremental improvements to Energy and Carbon Targets in new developments although this should be stipulated through the Building Standards Technical updates. Proposing to move to Platinum Standards by 2022 when the new City Plan would be implemented would be difficult to achieve and sits out of sync with the University's 2040 target.
- We would also note that the University has a number of highly serviced buildings such as research institutes and laboratories which are challenging at this stage to deliver as Carbon Zero.
- Achieving such standards is not cost neutral and carries with it additional capital expenditure. From an initial review achieving Platinum Standards which appears to add a further 10-15% of cost to each Capital Project.

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Choice **4 A**

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

Short Response

Explanation The University can see the benefit of creating Place Briefs for areas within Edinburgh although we would welcome further dialogue with CEC on the process around creating and defining such Briefs. The University notes that Peffermill playing fields sits within a proposed Place Brief Area. As part of any Place Brief process the University would welcome a conversation with CEC on future land allocation and the appropriateness of the green belt allocation at Peffermill, especially on the western portion of the Peffermill beside Cameron Toll roundabout. In addition to this a continued dialogue on site connectivity and corridor 3, which links Peffermill to both the City Centre and BioQuarter, is also welcomed. Peffermill is currently subject to a live planning application (Peffermill Sports Village). The application has been supported by a case for green belt development, on the western portion of Peffermill. This case has been submitted as part of the suite of Planning Application documents. Subject to approval of the live planning application, the University will engage further with the planning authority and Community Council on a proposed Place Brief and this can address how to treat Peffermill Sports Village as part of a future Proposals Map and associated policies in the future City Plan.

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

We have marked no to this response but there are some items detailed above that we are supportive of. Our response below outlines the areas that we can support and other areas where we can not currently support. We would welcome further dialogue with CEC in relation to Choice 10. The University makes significant investment in developing high quality, purpose built student accommodation that responds to the needs of our student community. Our accommodation requirement is linked to demand from undergraduate and postgraduate students and their preferences on how they want to both live while studying in Edinburgh. Creating safe and affordable accommodation, with spaces that allow students to interact and build community, is our key focus in the delivery of our accommodation portfolio. In addition to this, the University also ensures that students have access to on-site support via a live on Site Warden and Residence Life Assistants. Our site staff interact with our students to ensure care and support is provided across each of our student residences.

In order to build communities within student developments, it is essential that each development has space to create a student common room and other support facilities – these are spaces where all residents can meet and interact and community building events can be hosted by our Residence Life teams.

The University develops new accommodation to align with our student’s requirements. With each project that we design and construct, we carry out significant consultation with the Edinburgh Student Union Association (EUSA). This ensures each development meets student expectations and that the best value is achieved, resulting in our offering to the students being as commercially sustainable and affordable as possible. The University has an approved Student Residential Accommodation Strategy 2018-2028 which provides a guide for how our accommodation is delivered and is linked to both student demand and preferences. The developments are designed to create a mix of flexible cluster flats with a common kitchen / living space a range of differing room types and price points (twin rooms, private room with access to shared bathroom and ensuite room) within the same flat. The University expects development sites to be safe and have good transport connectivity to the City and University Campus locations so that walking, cycling and public transport use is actively encouraged. We are supportive of the following points:

- New purpose-built student accommodation to be located on a direct walking, cycling, or public transport route to its intended university or college. We are supportive as this aligns to our strategy.
- To deliver a maximum of 10% studio flats. We are supportive as this aligns to our strategy. At present the University has 152 studio apartments, this stock is usually the most expensive and has the lowest student uptake. Therefore as we develop new or refurbished stock we do not create any new additional studios due to lack of demand. In addition to concerns of the high cost of studios they also pose flexibility issues as they cannot be converted into other residential uses which is the case with cluster flat arrangements. The University is clear in its belief that studio flats do not foster healthy student communities. Studio flats can lead to social isolation and therefore cluster flats allow the opportunity for students to interact and improve wellbeing. With regards to Choice 10 the University is not currently supportive of:
- To deliver market and affordable housing as part of the mix. We are not supportive of applying this to campus locations or

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ANON-KU2U-GWDS-V

Supporting Info

Yes

Name

Steven Poliri

Email

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Response Type

Organisation / Public Agency

On behalf of:

University of Edinburgh

land owned by UoE as this does not align with our core business of providing Higher Education and would divert both financial and land resources away from the provision of Learning, Teaching and Research. This proposed change would also reduce the density of student accommodation that could be achieved on any given site. The end result would be that the same quantity of student accommodation would be developed over a greater number of sites – making it more difficult to operate and maintain. •To be built for, and managed by, one of Edinburgh’s universities or colleges Student Accommodation, in Edinburgh, does not need to be built exclusively for and managed by the University. However the supply of student accommodation does need to be linked to the demand for such accommodation from the cities Universities and Colleges. Planning applications for student accommodation development sites should evidence, as part of the planning process that it is being brought forward to satisfy the Universities and College’s accommodation demand. This would reduce the speculative nature of the applications and ensure that each site is being brought forward to respond to need. This should allow for other sites to be developed for other land uses. The planning process could potentially include all the City Universities and Colleges as consultees for each application ensuring that there is demand for additional accommodation. An operator could also be required to be confirmed and named along with a Management Plan being submitted as part of the planning process. The proliferation of speculative student development has brought undue negative attention onto the city’s student population. Our students contribute to both the community and economy of the city and require safe, affordable and accessible accommodation within the city. Linking the provision to demand will ensure that there is no negative perception of “overprovision” and will be mapped directly to need.

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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 University's Student Residential Accommodation Strategy 2018-28 defines that student accommodation developments are required to be a minimum of 200 beds to ensure that the appropriate common facilities and open space can be provided, as well as residence life staff and live onsite warden support. Developments below this scale would pose operational challenges and result in many smaller developments being required to achieve the bed requirement – this would be disconnected and difficult to manage efficiently. 0.25 hectare is a very small area to have 50% housing and would result in a site where the student accommodation component would be too small to be operationally viable. From initial studies that we have carried out this would result in a development of 70-80 beds, which is not particularly sustainable and does not encourage healthy student communities. A minimum site size study was carried out in order to understand a 50/50 student accommodation / residential split. The minimum area required would be 0.75 hectares. Nonetheless, even at this scale, the site would not be financially viable for the University as 50% of the site would be allocated for other residential uses resulting in the need for a larger site to make our student accommodation offering both affordable to our students and financially sustainable for the University. Therefore we would request that this choice is not adopted for application to University Campus sites or University owned land.

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

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Choice **11 A**

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

Short Response

Explanation The University assumes that this would not apply to our existing Estate and projects where we would look to convert existing buildings into student or staff accommodation (i.e. Buccleuch Place). Otherwise we would request that this is not applied the University estate as it would impact the financial viability of creating such accommodation for students and staff. The University also assumes that where we propose to convert existing accommodation into student or staff accommodation we would not pay an affordable housing contribution as in doing so would impact the financial viability of providing such accommodation to our students and staff. The University notes that if the intention is to move the proportion from 25-35% this would, in all likelihood, increase the cost of the other accommodation types on the mixed use site.

Choice **11 B**

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

Short Response

Explanation

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01529

Response Ref:

ANON-KU2U-GWDS-V

Supporting Info

Yes

Name

Steven Poliri

Email

steven.poliri@ed.ac.uk

Response Type

Organisation / Public Agency

On behalf of:

University of Edinburgh

Choice 12 A

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

Short Response

Not Answered

Explanation

Choice 12 B1

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

Short Response

Not Answered

Explanation

Choice 12 B2

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

Short Response

Not Answered

Explanation

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Choice **12 B3**

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

Short Response

Explanation

Choice **12 B4**

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

Short Response

Explanation

Choice **12 B5**

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

Short Response

Explanation

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Choice **12 B6**

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

Short Response

Explanation

Choice **12 B7**

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

Short Response

Explanation

Choice **12 B8**

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

Short Response

Explanation

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Email

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

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

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Choice 12 C

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

Short Response

Explanation

Choice 12 C

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

Short Response

Explanation

Choice 12 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 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 The University would like to see innovation space and incubation space specifically covered and encouraged by this policy. This space is vital to start-ups and spin out companies and needs to be affordable therefore it can often struggle against other higher value uses in mixed-use masterplans. This type of space is vital to the proliferation of successful innovative companies that is so vital to the city, and therefore deserves support from this policy. This choice should also reference research which is increasingly important to the University and the future of the city. The future recovery of the city in a post COVID-19 environment necessitates the provision of ample accessible space for economic development and regeneration, and this may necessitate a re-alignment of the proposed plan.

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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

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

Supporting Info

Email

Choice 16 E5

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

Short Response

Explanation

Choice 16 E6

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

Short Response

Explanation

Choice 16 E7

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 E8

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

Short Response

Explanation

Choice 16 EX

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

Short Response

Explanation

Choice 16 F

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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



THE UNIVERSITY *of* EDINBURGH

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29 April 2020

Mr Iain McFarlane
Programme Director, City Plan 2030
City of Edinburgh Council
Waverley Court
4 East Market Street
Edinburgh
EH8 8BG

Dear Mr McFarlane,

Ref: ANON-KU2U-GWDS-V

City Plan 2030 – University of Edinburgh Consultation Response

I write on behalf of the University of Edinburgh ('the University') in relation to the City Plan 2030 Consultation.

The University is generally supportive of the City of Edinburgh Council (CEC) ambitions and many of the proposed changes set out in the Choices for City Plan 2030 document. The University would like to provide comment on the below choices and also draw attention to specific items that we are unable to fully support, at this stage, but would welcome further collaborative dialogue on throughout the development and implementation of City Plan 2030.

However before doing so I think it necessary to flag a concern over any potential delay to the development and adoption of the City Plan 2030 arising from the Covid-19 emergency. From the University's perspective it is vital that the City retains a clear planning framework and avoids the challenge of the existing LDP 'falling away'. The University believes that a new plan is needed and would urge the development of an appropriate planning framework to support the regeneration and renewal of the City in the short to medium term.

Furthermore there is a question in the post Covid-19 environment whether the plan needs to be refocussed on the provision of the economic infrastructure to support the regeneration of the City. In specific terms, have too many brownfield sites been allocated to residential development in the draft plan?

A separate response has also been submitted, on behalf of the four partners, for Edinburgh BioQuarter.



Director of Estates: Gary Jebb
The University of Edinburgh is a charitable body, registered in Scotland, with registration number SC005336

Choice 1 – Making Edinburgh a sustainable, active and connected City

The University is supportive of the CEC’s ambition to create a sustainable City that improves health and wellbeing by actively promoting walking and cycling while reducing unnecessary car travel.

This aim aligns with the University’s own strategy to create a sustainable estate that strengthens our sense of place and creates safe and sustainable connections between our buildings for our students, staff and wider community to utilise.

With regards to Choice 1, the University provides the following comments:

Proposed CEC Change	UoE Comment
<ul style="list-style-type: none">introduce a new ‘extra-large green space standard’ which recognises the need for new communities to have access to green spaces more than 5 hectares, as well as smaller greenspaces.	<ul style="list-style-type: none">Clarity required on when and for what size of development site the extra-large green space standard would apply?
<ul style="list-style-type: none">living roofs, and nature-based drainage solutions including, ponds, swales, rain gardens and ecosystem services	<ul style="list-style-type: none">Living roofs pose operational and maintenance challenges and add an annual cost to the maintenance of a building. These need to be considered on a project by project basis to identify if such items are appropriate for the site, location and use. The long term viability of living roofs is as yet unproven.
<ul style="list-style-type: none">Active travel route	<ul style="list-style-type: none">An active travel route has been illustrated in close proximity to Peffermill Playing Fields. This area is home to our sports facilities with a range of outdoor and indoor sporting activities taking place on site. We would request further dialogue with CEC on the active travel route through Inch Park.

Choice 2 – Improving the quality, density and accessibility of development

With regards to Choice 2 the University provides the following comments:

Proposed CEC Change	UoE Comment
<ul style="list-style-type: none">all development (including change of use) 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.	<ul style="list-style-type: none">Clarity required on how ‘future adaptability’ should be illustrated as part of a planning application for a development?

Choice 3 – Delivering carbon neutral buildings

The University is supportive of CEC’s aspiration as the University is on a similar journey to be net zero carbon by 2040, however we request that further consideration is given to the need to actively implement this choice. At present, a mechanism exists to ensure that new building projects comply with Scottish Government Carbon Targets. The Scottish Building Regulations, which are updated on a regular basis, provide the most appropriate forum for agreeing and setting the Energy and Carbon standards, and timeline for implementation, for the Construction Industry.

Since 2010 significant uplifts in Carbon Targets have been made; in applying a secondary requirement via the planning application process there is a duplication of efforts and potential for confusion. The University’s position is that the Scottish Building Regulations and guidance, provided via the Technical Handbooks, should continue to be the single mechanism for controlling the requirements relating to Energy and Carbon Targets for development projects.

As noted, the University is on a similar journey and has committed to becoming net zero carbon by 2040. The University's Climate Strategy 2016 lays out the comprehensive institution approach to climate change mitigation and adaptation in order to achieve its ambitious targets.

https://www.ed.ac.uk/files/atoms/files/web_view_-_climate_strategy_2016-2026_spreads.pdf

To meet this target the University is developing an Energy Masterplan which sets out campus specific approaches to energy infrastructure investment. The plan is a long term programme of measures that seeks to address existing asset life, incremental reduction in heat network temperatures, energy demand minimisation, and the introduction of low carbon supply strategies.

The University has identified 2040 as an achievable target date by carefully reviewing our capabilities to meet this date. Attempting to achieve a target date 10 years in advance of this places additional burdens on the University, and we have concerns that we, and our supply chain, may not be achieve this by 2022 when the proposed new City Plan would be adopted.

With regards to Choice 3 the University is **not currently supportive** of:

Proposed CEC Change	UoE Comment
<ul style="list-style-type: none">We want to require all buildings and conversions to meet the zero carbon / <u>platinum standards</u> as set out in the current Scottish Building Regulations. We will continue to require at least to be met through low 50% of the carbon reduction target and zero-carbon generating technologies.	<ul style="list-style-type: none">Supportive of aspiration, but request that the Scottish Building Regulations and the regular updates to the Building Standards remain as the single mechanism for determining sustainability and energy standards for the construction industry.Not supportive of applying this to Listed and Historic Buildings as it would not be achievable whilst also retaining heritage and conversation elements of the properties.Not supportive of applying this to refurbishments or conversions unless clear guidance is provided on how to achieve energy and sustainability items in listed or existing buildings i.e. detailed in Building Standards Technical Handbook and Historic Environment Scotland GuidanceWe are supportive of incremental improvements to Energy and Carbon Targets in new developments although this should be stipulated

	<p>through the Building Standards Technical updates. Proposing to move to Platinum Standards by 2022 when the new City Plan would be implemented would be difficult to achieve and sits out of sync with the University's 2040 target.</p> <ul style="list-style-type: none"> • We would also note that the University has a number of highly serviced buildings such as research institutes and laboratories which are challenging at this stage to deliver as net Carbon Zero. • Achieving such standards is not cost neutral and carries with it additional capital expenditure. From an initial review achieving Platinum Standards appears to add a further 10-15% of cost to each Capital Project.
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Choice 4 – Creating Place Briefs and supporting the use of Local Place Plans

The University can see the benefit of creating Place Briefs for areas within Edinburgh although we would welcome further dialogue with CEC on the process around creating and defining such Briefs.

The University notes that Peffermill playing fields sits within a proposed Place Brief Area. As part of any Place Brief process the University would welcome a conversation with CEC on future land allocation and the appropriateness of the green belt allocation at Peffermill, especially on the western portion of the Peffermill beside Cameron Toll roundabout. In addition to this a continued dialogue on site connectivity and corridor 3, which links Peffermill to both the City Centre and BioQuarter, is also welcomed.

Peffermill is currently subject to a live planning application (Peffermill Sports Village). The application has been supported by a case for green belt development, on the western portion of Peffermill. This case has been submitted as part of the suite of Planning Application documents.

Subject to approval of the live planning application, the University will engage further with the planning authority and Community Council on a proposed Place Brief and this can address how to treat Peffermill Sports Village as part of a future Proposals Map and associated policies in the future City Plan.

Choice 10 – Creating sustainable communities

The University makes significant investment in developing high quality, purpose built student accommodation that responds to the needs of our student community. Our accommodation requirement is linked to demand from undergraduate and postgraduate students and their preferences on how they want to both live while studying in Edinburgh.

Creating safe and affordable accommodation, with spaces that allow students to interact and build community, is our key focus in the delivery of our accommodation portfolio. In addition to this, the University also ensures that students have access to on-site support via a live on Site Warden and Residence Life Assistants. Our site staff interact with our students to ensure care and support is provided across each of our student residences.

In order to build communities within student developments, it is essential that each development has space to create a student common room and other support facilities – these are spaces where all residents can meet and interact and community building events can be hosted by our Residence Life teams.

The University develops new accommodation to align with our students' requirements. With each project that we design and construct, we carry out significant consultation with the Edinburgh Student Union Association (EUSA). This ensures each development meets student expectations and that and best value is achieved, resulting in our offering to the students being as commercially sustainable and affordable as possible.

The University has an approved Student Residential Accommodation Strategy 2018-2028 which provides a guide for how our accommodation is delivered and is linked to both student demand and preferences. The developments are designed to create a mix of flexible cluster flats with a common kitchen / living space a range of differing room types and price points (twin rooms, private room with access to shared bathroom and ensuite room) within the same flat. The University expects development sites to be safe and have good transport connectivity to the City and University Campus locations so that walking, cycling and public transport use is actively encouraged.

With regards to Choice 10 the University of Edinburgh is **supportive** of:

Proposed CEC Change	UoE Comment
<ul style="list-style-type: none"> New purpose-built student accommodation to be located on a direct walking, cycling, or public transport route to its intended university or college. 	<ul style="list-style-type: none"> UoE are supportive as this aligns to our strategy.
<ul style="list-style-type: none"> To deliver a maximum of 10% studio flats. 	<ul style="list-style-type: none"> UoE are supportive as this aligns to our strategy. At present the University has 152 studio apartments, this stock is usually the most expensive and has the lowest student uptake. Therefore as we develop new or refurbished stock we do not create any new additional studios due to lack of demand. In addition to concerns of the high cost of studios they also pose flexibility issues as they cannot be converted into other residential uses which is the case with cluster flat arrangements. The University is clear in its belief that studio flats do not foster healthy student communities. Studio flats can lead to social isolation and therefore cluster flats allow the opportunity for students to interact and improve wellbeing.

With regards to Choice 10 the University is **not currently supportive** of:

Proposed CEC Change	UoE Comment
<ul style="list-style-type: none"> To deliver market and affordable housing as part of the mix 	<ul style="list-style-type: none"> UoE are not supportive of this applying to campus locations or land owned by UoE as this does not align with our core business of providing Higher Education and would divert both financial and land resources away from the provision of Learning, Teaching and Research.

	<ul style="list-style-type: none"> This proposed change would also reduce the density of student accommodation that could be achieved on any given site. The end result would be that the same quantity of student accommodation would be developed over a greater number of sites – making it more difficult to operate and maintain.
<ul style="list-style-type: none"> On sites over 0.25 hectares coming forward for student housing, hotels and short-stay commercial visitor accommodation, and other commercial business, retail and leisure developments, at least 50% of the site should be provided for housing. 	<ul style="list-style-type: none"> The University’s Student Residential Accommodation Strategy 2018-28 defines that student accommodation developments are required to be a minimum of 200 beds to ensure that the appropriate common facilities and open space can be provided, as well as residence life staff and live onsite warden support. Developments below this scale would pose operational challenges and result in many smaller developments being required to achieve the bed requirement – this would be disconnected and difficult to manage efficiently. 0.25 hectare is a very small area to have 50% housing and would result in a site where the student accommodation component would be too small to be operationally viable. From initial studies that we have carried out this would result in a development of 70-80 beds, which is not particularly sustainable and does not encourage healthy student communities. A minimum site size study was carried out in order to understand a 50/50 student accommodation / residential split. The minimum area required would be 0.75 hectares. Nonetheless, even at this scale, the site would not be financially viable for the University as 50% of the site would be allocated for other residential uses resulting in the need for a larger site to make our student accommodation offering both affordable to our students and financially sustainable for the University. Therefore we would request that this choice is <u>not</u> adopted for application to University Campus sites or University owned land.
<ul style="list-style-type: none"> To be built for, and managed by, one of Edinburgh’s universities or colleges 	<ul style="list-style-type: none"> Student Accommodation, in Edinburgh, does not need to be built exclusively for and managed by the University. However the <u>supply</u> of student accommodation does need to be <u>linked to</u> the <u>demand</u> for such accommodation from the cities Universities and Colleges. Planning applications for student accommodation development sites should evidence, as part of the planning process that it is being brought forward to satisfy the Universities and College’s accommodation demand. This would reduce the speculative nature of the applications and ensure that each

	<p>site is being brought forward to respond to need. This should allow for other sites to be developed for other land uses.</p> <ul style="list-style-type: none"> • The planning process could potentially include all the City Universities and Colleges as consultees for each application ensuring that there is demand for additional accommodation. An operator could also be required to be confirmed and named along with a Management Plan being submitted as part of the planning process. • The proliferation of speculative student development has brought undue negative attention onto the City's student population. Our students contribute to both the community and economy of the City and require safe, affordable and accessible accommodation within the City. Linking the provision to demand will ensure that there is no negative perception of "overprovision" and will be mapped directly to need.
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Choice 11 – Delivering more affordable homes

With regards to Choice 11 the University of Edinburgh offers the following comments:

Proposed CEC Change	UoE Comment
<ul style="list-style-type: none"> • amend 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. 	<ul style="list-style-type: none"> • The University assumes that this would not apply to our existing Estate and projects where we would look to convert existing buildings into student or staff accommodation (i.e. Buccleuch Place). Otherwise we would request that this is not applied the University estate as it would impact the financial viability of creating such accommodation for students and staff. • The University also assumes that where we propose to convert existing accommodation into student or staff accommodation we would not pay an affordable housing contribution as in doing so would impact the financial viability of providing such accommodation to our students and staff. • The University notes that if the intention is to move the proportion from 25-35% this would, in all likelihood, increase the cost of the other accommodation types on the mixed use site.

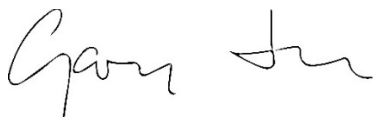
Choice 13 – Supporting inclusive growth, innovation, universities and culture

With regards to Choice 11 the University of Edinburgh provides the following comments:

Proposed CEC Change	UoE Comment
<ul style="list-style-type: none">• Projects and actions arising from the transformation of the City Centre• Edinburgh’s festivals and cultural offering across the City• Development associated with our universities and colleges that relates to innovation and learning• The Edinburgh BioQuarter• West Edinburgh (see also Choice 14)• This policy will not be designed to provide support for standalone, purpose-built student accommodation, short term lets, hotels or leisure, offices or business and industrial land as these are covered under other Choices in this document and policies in the local development plan.	<ul style="list-style-type: none">• The University would like to see innovation space and incubation space specifically covered and encouraged by this policy. This space is vital to start-ups and spin out companies and needs to be affordable therefore it can often struggle against other higher value uses in mixed-use masterplans. This type of space is vital to the proliferation of successful innovative companies that is so vital to the City, and therefore deserves support from this policy.• This choice should also reference research which is increasingly important to the University and the future of the City.• The future recovery of the City in a post Covid-19 environment necessitates the provision of ample accessible space for economic development and regeneration, and this may necessitate a re-alignment of the proposed plan.

I trust the detail provided is sufficient and would request that CEC aim to address our concerns. The University would welcome further collaborative dialogue with CEC throughout the preparation of the final version of City Plan 2030.

Yours sincerely,



Gary Jebb
Director of Estates