

Response ID ANON-KU2U-GTBG-B

Submitted to **Choices for City Plan 2030**

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Your information and data

1 What is your name?

Name:

David Melhuish

2 What is your email address?

Email:

dmelhuish@bpf.org.uk

3. If you do not have an email address What is your address?

Full address including postcode:

Scottish Property Federation

3 Cockburn Street

Edinburgh

EH1 1QB

4 I am responding as

Organisation / Public Agency

5 IF you are responding on behalf of an organisation or an other individual, what is their name?

Agent on behalf of:

Scottish Property Federation

6 I agree to my response being published to this consultation.

Yes

Choice 1 - Making Edinburgh a sustainable, active and connected city

1A 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?

Yes

Explain why:

We need to make the place principle a reality. This means that new development must put its principles into practice. This will ensure the long term value and sustainability of new places and add to the attractiveness of Edinburgh as a whole. Our members have already worked hard with local communities to deliver this policy. The Springside development by Grosvenor for example and community gardens. The plan for the new coastal town in Granton does offer an exemplar for the ambition of new settlements, and similarly the proposals for the Garden city complex in the West Edinburgh area have a detailed proposals for sustainable transport and green networks. New development will, however, be confined by land ownership and constraints should not be placed on development by unrealistic expectations of development on land outwith an applicant for planning permission's ownership.

1B 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?

No

Explain why:

We agree that the inclusion of Green and Blue infrastructure is an important feature of new development, but there has to be some pragmatism as well and every case should be balanced on its planning merits overall. For example, it may not be feasible to incorporate natural features into every development. However, we do not disagree with the aspiration to include green and blue infrastructure as a first principle to be adopted where feasible, viable and sustainable.

1C 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

Explain why:

This is a sensible policy and the industry will wish to work closely with the city and key agencies to deliver its aspirations. Climate change is happening and our new and existing communities will need to adapt. Greater rainfall is to be expected and this is already putting significant pressure on our drainage and sewerage systems. The planning authority must have due regard to the long term sustainability of proposals however, including their economic and maintenance sustainability.

1D 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?

No

Explain why:

We are concerned with this proposal and would encourage the city to engage directly with stakeholders before seeking to apply policies on the acceptability of under-used or poor quality space. The city does not have a monopoly of wisdom on the good use or otherwise of properties. We fear that the policies set out under this section could lead to a blunt approach being taken to regulating 'poor quality' and underused open spaces' and therefore we could not support such an approach until we see more detail of the intent behind proposal 1D.

1E 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

Explain why:

We believe a new extra-large green space standard is a positive proposal and would encourage the city to pro-actively discuss the extent of this requirement with developers and communities, as part of large-scale green field land releases. More generally for development, we do support active green spaces but we would add the caveat of ensuring new development remains viable if larger green spaces are enforced as a planning condition.

1F 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?

No

Explain why:

We support these proposals where they are feasible but we would be wary of agreeing with any assumption that they are measures to be applied to all or even most developments. There must also be a sensible view of the likely take-up by the communities expected to live nearby these facilities.

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1G We want to identify space for additional cemetery provision, including the potential for green and woodland burials. Do you agree with this?

Yes

Explain why:

This policy will need to be applied with great care and sensitivity. The issue of enhanced burial or even crematorium provision for a growing population will need to be tackled but communities may have contrary views on proposals for woodland burials, and there will be an ongoing challenge of sustaining the protection and maintenance of woodland burial sites.

1H 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

Explain why:

We believe it is critical to make an assessment of long term implications for maintenance and management, before applying any planning conditions for green space designations within new development proposals. It is important that if this is to involve contributions from new residents and businesses who may occupy areas involved with long-term maintenance and management arrangements, then it is very transparent. Where there are enhanced open spaces, which may serve a wide area rather than the immediate population, these should be maintained by the Council, just as existing large spaces are - there should not be an additional stealth tax for residents of new homes that doesn't affect residents in the rest of the city.

Choice 2 - Improving the quality and density of development

2A 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

Explain why:

We agree that these requirements should be sought, but with a pragmatic approach, as there may be some buildings where accessibility issues, or climate change mitigation, may simply be unfeasible. For example, the adaptation of older buildings including tenements may not easily be amended for accessibility design issues.

2B 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?

No

Explain why:

We think that the policies proposed as a whole create a tension between the envisaged residential areas with green and blue infrastructure, enhanced open spaces, space for food growing, accessible homes, homes that suit a range of lifestyles and age profiles and the density standard that is being sought here. The minimum density threshold of 65 per hectare is too high. To accommodate a range of tenures and dwellings, as required by residents, there should be a greater scope of density from 40 to 100 and we should not lose sight of the previous requirement to develop homes that fit with the character of the surrounding area. Edinburgh should not be a city where families are no longer allowed to buy a new detached home with a garden.

2C 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

Explain why:

This is important for well-being and the property industry should see to incorporate these principles into new development proposals. Again, however, it is important that development is not held back because of unrealistic expectations of a developer's ability to build connections over land that is not owned. The City Council must be prepared to use Compulsory Purchase powers itself, where aspirations for connectivity cannot be delivered, as partners in the development of the city we all want to live in. The impact of the covid-19 crisis on travel and commuting behaviour remains to be seen and the city (and government) may need to take action to highlight the benefits of public transport.

2D 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?

No

Explain why:

One of the benefits of the student housing sector becoming a major, main stream investment asset class is that the quality and design of its places and properties have improved. This evolution should continue and good open places and positive experiences of Edinburgh as a destination will help to attract students to remain in the city once they have graduated. However, we feel this approach is too broad. It is important that we do not introduce policies that could inadvertently deter otherwise good development proposals, for example the reuse of a derelict building in a constrained area. There is an essential and unresolved tension between the open space aspirations and the density requirements that the document proposes. We should also not lose sight of the general desire for households to have private open spaces that they can enjoy and many would choose these over larger shared spaces if offered a choice.

Choice 3 - Delivering carbon neutral buildings**2A 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?**

Silver

Explain why:

This should not be a one off policy stipulation. The Scottish Government has set a policy of requiring net-zero buildings for new build requiring building consents from 2024. Edinburgh's policies should build towards this and seek to raise sustainable standards for new build in a phased, but determined approach, in line with Government set policy requirements and building regulations.

Choice 4 - Creating Place Briefs and supporting the use of Local Place Plans in our communities**4A 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

Explain why:

The new Planning Act enables Local Place Plans to be proposed by local communities and proactive engagement by the planning service of the city is therefore essential. It is vitally important that the council, together with communities, key agencies and industry stakeholders are able to identify feasible infrastructure for new developments. It remains the case that significant objection occurs at the application stage on sites allocated in the Development Plan, so it is important that all avenues are explored by the City Council to engage communities in the difficult choices at the point of principle, thus reducing the current tendency for the Plan to be ignored and every application to be treated as a 'battle' that communities are inevitably seen to 'lose' on allocated sites.

4B 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?:

The council will need to demonstrate to aspiring Place Plan teams how their plans will fit with the Development Plan. It seems reasonable to expect the City Council to provide resources, both in terms of direct funding and also advisory staff, to support communities in their endeavours to prepare plans. The Council must also encourage communities to understand that the Place Plan is a guide for the future, not a tool to prevent development from taking place and encourage them to engage with the thorny questions of where new development can be accommodated. The Council could also support LPPs through identifying the major questions and key stakeholders - business, housing, education, NHS, power, water - and use the city's influence to ensure these key sectors engage as appropriate with LPPs.

Choice 5 - Delivering community infrastructure

5A 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

Explain why:

We support an infrastructure-led approach to new development. Therefore it is important to plan, adapt and innovate as necessary, in order to develop the appropriate infrastructure for new developments and indeed, to retrofit key infrastructure for existing communities. Where major new infrastructure is required, a wide view must be taken on how it is to be funded, as developer contributions may not be a suitable mechanism to achieve the development of high schools etc.

5B 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

Explain why:

We agree with this proposal. New development is complex and subject to ever greater demands. It is important that investors and developers are as certain as possible about the requirements that will be required for new developments.

5C 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

Explain why:

This will not only be more convenient and acceptable for new communities, it will support wider carbon emission strategies and, critically, contribute more effectively to building a sense of community in new developments.

5D.1 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

Explain why:

Yes, it is important that investors are able to predict with greater certainty, the levels of contribution relevant to their project development appraisals. The requirements must, however, be realistic and proportionate, so as to ensure landowners are still incentivised to sell and that development proposed is viable.

5D.2 We want to use cumulative contribution zones to determine infrastructure actions, costs and delivery mechanisms. Do you agree with this?

No

Explain why:

It is difficult for us to accept this proposal on behalf of our members without further detail. In addition, we still await details of a proposed infrastructure levy and therefore the idea of cumulative contribution zones that may seek a second 'tax' for potentially the same purpose threatens to make development unattractive and potentially un-viable in Edinburgh.

5E 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

Explain why:

We agree and would prefer this approach. This would be more transparent for the industry and reduce uncertainty for investors.

Choice 6 - Creating places for people, not cars

6A 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

Explain why:

We agree and support this proposal but there needs to be a balanced assessment, for example where new development supports Electric vehicle infrastructure or other carbon emissions reduction policies. It is also important to allow sufficient parking in residential areas, so that people can leave them when using public transport. It is possible to create a reverse incentive, where people take their cars to work to avoid daytime parking restrictions where they live.

6B 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

Explain why:

Yes but again there needs to be a balance whereby developments that support EV infrastructure - for example through EV supportive parking, and therefore promote the use of electric vehicles, are rewarded. It is important also not to create another layer of hypothetical assessment that has to be undertaken, disputed and debated with every single planning application, to the benefit of nobody except planning consultants. As per our answer in 6A, people who have somewhere secure to leave their car may be more likely to use public transport. We should also take care to recognise that the model of everyone travelling in to the City Centre to work is unrealistic and that people's employment patterns can be dispersed widely and that some residents will need to go to work in their vehicles.

Choice 7 - Supporting the reduction in car use in Edinburgh

7A 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?

Not Answered

Explain why:

There is some evidence that at least traditional car use ownership is falling in some elements of the population and more room needs to be found for other forms of transport, including the delivery of goods and public transport. New development should be connected and accessible, but rigid parking standards can have the effect of displacing vehicles and creating more problems.

7B 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

Explain why:

We agree in principle but the city will need to manage the genuine commercial needs of city centre businesses requiring goods to be delivered, sought and transported. It is also important to be mindful of accessibility needs and older people's and people with certain health conditions' ability to walk longer distances, that runs the risk of making the City Centre inaccessible for people who are not classified as having a disability.

7C 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

Explain why:

We agree.

7D 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?

Yes

Explain why:

We agree with the proposals to enhance the provision of park and ride facilities in the city. To be effective the Ingliston P&R site is likely to need further enhanced connections to the A8 as the current roundabout performs poorly in wet conditions, often causing significant issues for connections to the P&R or the airport itself.

Choice 8 - Delivering new walking and cycle routes

8A 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

Explain why:

To support more active transport use, which will also support well-being. The recent experience of the covid-19 restrictions, with limited time for communities to exercise or go out to obtain necessary items, has underlined the importance of a strong cycle and footpath network.

8B 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

8C 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

Explain why:

To support active travel uses and, in terms of continuity, to provide certainty for developers with respect to the existing plans for active travel use.

Upload new cycle routes:

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Choice 9 - Protecting against the loss of Edinburgh's homes to other uses

9A 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

Explain why:

The existing policy on preventing inappropriate uses of residential properties has become clearly overtaken by the surge in short-term letting. However, the city may wish to consider the use of properties for this purpose in the light of the post Covid-19 economy - the early signs are that there may be a very significant reduction in tourism and potentially, the viability of short term lets in the near future.

The SPF has argued that the time for regulation has come of this industry, although we are yet to see how Covid-19 has affected the short term let sector. However, we are not convinced that the planning system is the most appropriate vehicle for the regulation of short-term lets. But, if that is the intended platform of regulation then it needs to be done properly and we will therefore support, and engage with, the city's proposed consultation on short term let areas.

9B 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

Explain why:

We support this consultation for the reasons explained under 9A.

Choice 10 - Ensuring the better use of land

10A. 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

Explain why:

We agree that it is important to update purpose built student housing policies. That said, we believe the existing basis of PBSA development remains sound (calling for balanced communities and looking, where possible, to move students into bespoke accommodation rather than occupying family-based housing).

10B 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?

No

Explain why:

Although we support the policy intention of building in mixed-use development at the plan stage, we are concerned that the designation of 50% housing provision across all of these potential sites could make some otherwise viable sites unsustainable or unviable.

10C 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

Explain why:

We agree that there should be a policy that will support changed use of retail/commercial led out of centre areas where appropriate and redevelopment is proposed. However, the emphasis must be on flexibility to enable redevelopment where it is required and feasible.

Choice 11 - Delivering more affordable homes

11A We want to amend our policy to increase the provision of affordable housing requirement from 25% to 35%. Do you agree with this approach?

No

Explain why:

We believe that a 35% ratio may simply be too high for many development proposals in Edinburgh. This might deter otherwise viable proposals for development. The council should be under no illusions that this is a tax on other homeowners or tenants: it will be likely to become an unsustainable burden on the development viability of a number of projects. The policy proposal states that this proportion is also set to be applied to PBSA and commercial led sites where a 50% allocation of housing is required - we see the 35% affordable housing ratio adding to the challenges of making such development proposals viable. We feel it would be better to remain with 25% but depending on the strength of the development proposed, looking at alternative approaches to securing more affordable housing through the development process. Affordable housing should also be in types and sizes according to defined need, rather than necessarily a representative proportional mix across the whole site.

11B 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?

No

Explain why:

The 2030 CityPlan should aspire to increase housing of all tenures and we are concerned that a narrow prescriptive approach could undermine this aspiration. Members that build and sell houses are best placed to determine the mix of housing types and tenures that can be delivered, although all would generally support the development of family housing and enhancement of the PRS. An overly prescriptive approach could have the undesirable effect of reducing housing provision in the City, as site viability can be affected by the over zealous application of prescriptive requirements. The vision for a growing population ought to be growth across all sectors as necessary to meet the various housing demands.

Choice 12 - Building our new homes and infrastructure

12A Which option do you support?

Option 3 (Blended approach)

Explain why you support that option, or why haven't chosen an option:

The city needs to use both green belt and brownfield land to meet its urgent housing needs in the course of this plan. The Greenbelt will be controversial no doubt, but the city needs to expand, making best use of its wider resources to support its population, rather than see housing developed in the surrounding regions, which inevitably drives longer and less sustainable commuting patterns. If the Greenbelt development is planned and delivered appropriately then it will support the sustainable economic growth of the city and the new communities that will need to be established and sustained. The centralised control of land proposed in the first option seems unrealistic and unnecessary. Care should be taken in relation to the re-use of urban land in current use, where local communities may object to the loss of existing facilities. The debate over the re-use of land in Leith Walk should serve as a reminder as to why such approaches may not be successful in reality.

12B Do you support or object to any of the proposed greenfield areas? (Please tick all that apply)

Support Greenfield - Support:

Support Greenfield - Object:

Explain why:

While we will not support or object to a specific site, in line with our earlier comments we agree the city needs to grow and that it is better for this growth to be properly planned through the development process. The breadth and location of these sites appears to support the reasonable ambitions of the city to grow and if adopted, we would encourage the city to work with private sector partners to bring forward the sites expeditiously.

12C Do you have a greenfield site you wish us to consider in the proposed Plan?

Greenfield file upload:

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Greenfield file upload:

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Greenfield file upload:

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12D Do you have a brownfield site you wish us to consider in the proposed Plan?

Brownfield sites upload:

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Choice 13 - Supporting inclusive growth, innovation, universities, & culture

13A 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

Explain why:

We agree that this would be a helpful policy. It would give useful guidance for development management, where applicants propose a change of use or adaptability of a building in order to deliver projects and new business opportunities.

Choice 14 - Delivering West Edinburgh

14A 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

Explain why:

The delivery of West Edinburgh is a strategic, complex, series of developments that offer significant opportunities for growing the city and ensuring this growth is integrated with the objectives of sustainable and inclusive growth. There must be a strong focus on public transport given the major investment already made in the tram and, we would anticipate in the near term, the return of heavy transport demand around the airport.

14B 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

Explain why:

The Royal Highland showground has been a hugely successful enterprise but it now exists in a very constrained area for the purposes of transport and public access. We believe that a better site is now urgently needed for this major Edinburgh event. Therefore alternative uses should be sought for the site.

14C 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

Explain why:

The airport and its surrounding area are arguably a strategic national asset given its proximity to the M90, M8 and M9. In addition the Gateway station is a significant investment which needs to be developed to its full potential. If the airport believes this is a safe and strong potential for the enhancement of the airport area then we agree that the city should seek to facilitate investment in the area.

Choice 15 - Protecting our city centre, town and local centres

15A 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

Explain why:

We agree that it is vitally important to promote a strong economic heartbeat to urban centres. That said, there will be a need to change some urban areas to add more residential elements. The experience of covid-19 will possibly accentuate the challenge of revitalising some urban centres, including within the city. It is likely that adaptation of existing properties may therefore become even more important than it was prior to the covid-19 crisis.

15B 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

Explain why:

The market has largely adopted this position already with very little shopping centre development outside of urban centres since 2009. Supermarkets

developments have also been few and far between in recent years. Leisure developments may offer a different issue and be more generally welcomed by the community outside of the city centre in certain cases.

15C 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

Explain why:

We support this approach.

15D 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?

The use of Supplementary Guidance

Explain why:

The retail sector is facing significant challenges, many of which have been apparent for several years. The covid-19 crisis is accelerating many of these challenges. There should be a general description of support for the sector. Change will also need to incorporate an assessment of the demand and needs for delivery based retail services.

15E 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

Explain why:

Before Covid-19 this was an important area of jobs, investment and economic growth for the city. It is too early to say if there will be long term changes to the growth of the tourist market and the plan should be flexible to adapt to any change in expected hotel demand. However, we agree with the principle of supporting new hotel development with access to public transport.

15F 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

Explain why:

The demand for retail space has dropped in general, with a move towards consolidation in prime retail centres and locations. This means a lack of demand for many previous retail stores which now need a new purpose. If a change of use can be successfully promoted, this will retain footfalls and activity in the city.

Choice 16 (part 1) - Delivering office floorspace

16A.1 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

Explain why:

There has been relatively little delivery of Grade A office space in recent years. This is due to risk aversion in the private sector borne out of the recession. Yet the market fundamentals for new office development are strong, with high take-up of available space and rental values around £35 per square foot. These rental values are among the highest in the UK outside of London and the south east of England. It is early to say with certainty what the impact and consequences of covid-19 will be on offices in the city, but it may at least increase home-working and possibly change commuter requirements.

16A.2 We want to support office development at commercial centres as these also provide accessible locations.

Yes

Explain why:

We agree but only where there is a clear economic case. Otherwise the office could become a liability if it remained unoccupied.

16A.3 We want to strengthen the requirement within the city centre to provide significant office floorspace within major mixed-use developments. Do you agree?

Yes

Explain why:

We agree and the loss of suitable office development sites has been a concern in the city. Any requirement should only be demanded where a development

scheme suggests a clear opportunity for the use of the office space.

16A.4 We want to amend the boundary of the Leith strategic office location to remove areas with residential development consent. Do you agree?

Yes

Explain why:

The important issue is to secure the successful and sustainable regeneration of the area. It is important therefore to remove unnecessary planning obstacles that impede the development of residential properties in the area, if there is a clear demand for such alternative uses, and if there continues to be little demand for offices in the area.

16A.5 We want to continue to support office development in other accessible locations elsewhere in the urban area. Do you agree?

Yes

Explain why:

Office development should continue to be supported where it is viable, but it should not become mandatory except where there is a clear need and opportunity.

Do you have an office site you wish us to consider in the proposed Plan?:

No file was uploaded

16B We want to identify sites and locations within Edinburgh with potential for office development. Do you agree with this?

Yes

Explain why:

Office development should be a key part of the plan, including potentially safeguarding some core parts of the wider city for the promotion of offices. However, as a ten year plan the city may need to amend proposals in the light of market experience and appetite.

16C 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.

I support no change to policy

Explain why:

We believe that a loss of office policy is an unnecessary restraint on the potential for the market to adapt buildings and development opportunities. It could lead to an unnecessary requirement on developers to provide alternative office supply in locations that simply cannot sustain the demand for this mode of occupation. For example, where there is an over-supply of older office properties around Haymarket, or where offices were actually developed from former residential properties and developers wish to revert the building to its original use.

Choice 16 (part 2) - Delivering Business and Industrial Space

16E 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:

Yes / No - Do not support:

Explain why:

Again, we do not generally advocate one particular site over another. However, there is an urgent need for modern business space, including industrial and logistical space, to support distribution and other business services at a local level. There has been relatively little industrial development in the city for some time and therefore we believe that opportunities should be promoted for this class of use.

16F 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

Explain why:

We believe it will be desirable to provide for such space in new residential-led development sites. This would promote less demand on roads travel and localised employment opportunities. However, we do not support a blunt approach to requiring new business space that will not be successfully occupied and traded from - and if there is a clear case for a housing-led development not needing such space then the policy should not prohibit that housing development.

16G 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

Explain why:

There is a significant lack of supply of industrial property in the Edinburgh area and it will be important to safeguard even some older stock in order to support supply in the region.

16H 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

Explain why:

The covid-19 crisis has shone a light on the need for strong logistical networks including local facilities. Local distribution of goods and services will reduce the need for travel, particularly on roads and thus support carbon emissions reduction, as well as localised employment.

Equalities and Rights

17 Do you think there will be any equalities or rights impacts (positive or negative) arising from the Choices?

Yes

Explain why:

There is clearly a tension between seeking to support mobility for disabled access within the city, and a desire to encourage more active travel, including reducing travel areas within the city.

Environmental Report

18 Do you have any comments on the environmental impacts set out in the Environmental Report arising from the Choices?

Yes

Please use the space below for comments.:

A growing city will inevitably create challenges for the implementation of key policy objectives. More people will mean more consumption and more transport, and more investment in the built environment and infrastructure. Yet a growing city also offers an opportunity to build and plan better for the future which gives us an opportunity to change the way we have traditionally built and delivered. More mixed-use places that are open and accessible, more emphasis on public transport and rebuilding local infrastructure to be closer to communities, including health and education provision.