

Response ID ANON-CUYN-2RDN-N

Submitted to City Plan 2030 - Proposed Plan's Period for Representation
Submitted on 2021-12-20 20:20:34

Your information and data

What is your name?

Name:
David Melhuish

You must provide either a contact email or postal address in case we need further information on your response.

What is your email address?

Email:
dmelhuish@bpf.org.uk

What is your address?

Full address:

Scott House
10 South St Andrew Street
Edinburgh

Postcode:
EH2 2AZ

I am responding as

Organisation / Public Agency

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

Agent on behalf of:
Scottish Property Federation

I agree to my response being published to this consultation.

Yes

City Plan 2030 - Representation Menu

What section of City Plan 2030 would you like to go to?

Submit Your Representations and Exit

Introduction

If you would like to make a Representation on the above section of City Plan 2030, please complete the following questions. If not, please scroll to the bottom of the page where you can navigate back to the City Plan 2030 - Representation Menu.

Do you support this section of the plan?

Not Answered

If you do not support this section, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

City Plan 2030 Strategy and Aims

The Plan will meet these aims through:

If you would like to make a Representation on the above section of City Plan 2030, please complete the following questions. If not, please scroll to the bottom of the page where you can navigate back to the City Plan 2030 - Representation Menu.

Do you support this section of the plan?

No

If you do not support this section, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

City Plan Aims - Page 8, Paragraph 2.2

We welcome the aspirations to direct new development towards brownfield rather than greenfield land, to bring forward mixed-use developments and to support the concept of 20 minute neighbourhoods. But we fear the prescriptive approach that appears to be adopted by CityPlan 2030 will be counter-productive. Its provisions may conflict with the objectives of delivering more affordable homes, economy recovery and indeed, regenerating the city economy and core places as we seek to recover from the pandemic.

Brownfield first is already supported by Scottish Planning Policy. This stipulates that brownfield sites should first be considered. Our concern is that by prescribing that new development must be directed towards brownfield sites, the city may inadvertently lose, or significantly delay, the opportunity to develop new communities, as well as business opportunities. A brownfield site is not always a viable option for development without very significant long term remediation, or infrastructure investment. If brownfield sites are not viable but insisted upon by city planning policies, then this would conflict with the intended purpose of delivering more homes, including affordable homes as well as related employment opportunities and community facilities.

We are also concerned that the requirement for new development to be located within the definition of a 20 minute neighbourhood is unnecessarily restrictive. If taken to its fullest definition, this would mean that a person should be able to leave their residence and within a 20 minute walk reach all of their social, health and economic requirements. This may not always be feasible in the context of city centre sites and again, the approach could conflict with potential regeneration of, for example former city centre offices or large industrial premises. If the requirement for development is rigidly required within the city's planning policies to meeting all of the tenets of a 20 minute neighbourhood, then we fear that the consequence could be that investment is attracted to alternative locations and regeneration projects could simply not happen.

The requirement for a minimum 35% affordable housing contribution for all forms of development will also, we fear make commercially led development projects simply unviable. The consequence could be a city that could struggle to attract sufficient new employment, leisure, build-to-rent or purpose built student accommodation to meet the needs of the future. There needs to be greater flexibility with this requirement, otherwise development may simply become unviable.

The SPF's view is that sustainability is about more than resolutely protecting greenfield sites. It needs to be considered in relation to locations where people wish to live. Policies must also enable and not deter development proposals that are financially sustainable and that can be delivered successfully, at the right time to meet the needs of the businesses or communities the development is intended to support.

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

The requirement for a 35% minimum affordable housing contribution will make some forms of development unviable in the city. This policy will be an obstacle to much needed investment in the purpose built student accommodation sector and the nascent build-to-rent sector. We propose that 35% is an aspiration, flexed to adapt to different projects and is not a minimum requirement.

The intention to direct new development towards brownfield land should retain the current SPP requirement for brownfield to be considered first. Without this flexibility, the city is again constraining its own ability to support new developments in non-brownfield locations that could bring forward new homes and business premises much earlier than an alternative brownfield site could achieve.

Where would you like to go next?

[Return to the City Plan 2030 - Representation Menu](#)

The City Plan Spatial Strategy

[Map 1 - Spatial Strategy \(illustrative\)](#)

[Map 2 - Spatial Strategy \(technical\)](#)

If you would like to make a Representation on the above section of City Plan 2030, please complete the following questions. If not, please scroll to the bottom of the page where you can navigate back to the City Plan 2030 - Representation Menu.

Do you support this section of the plan?

No

If you do not support this section, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Page 16, Paragraph 2.41

We are concerned that the plan places too much confidence in the successful compulsory purchase and reallocation for housing of several employment sites. Even if successful on a timely basis, the reallocation of existing businesses means that far from finding new opportunities to grow the economy, the city will find itself struggling to maintain the current number of industrial jobs and businesses.

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

We believe this paragraph represents a flaw in the planned city outcomes, and does not represent the challenge of sustaining employment while removing existing businesses from their locations in order to create housing land. This section and this paragraph should better recognise the cost of lost jobs and business as a result of displacement of existing businesses. In summary, when this section talks about supporting new business premises it should recognise these will not necessarily be additional jobs created and established.

Where would you like to go next?

Part 2 – How does the City Plan strategy work with national, regional and council strategies?

How does the City Plan strategy work with national, regional and council strategies?

If you would like to make a Representation on the above section of City Plan 2030, please complete the following questions. If not, please scroll to the bottom of the page where you can navigate back to the City Plan 2030 - Representation Menu.

Do you support this section of the plan?

No

If you do not support this section, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Page 12, Paragraph 2.18

We do not believe that the plan supports the intention of Scottish Planning Policy to deliver sustainable economic growth, or indeed sufficient housing, within the timespan of the plan. The core proposals to reallocate previously allocated new development employment sites to large housing have over-estimated the rate of delivery, leading to a shortfall in the housing numbers. This is added to by the requirement to provide the social infrastructure necessary to support these sites within an achievable timescale. Crucially, the plan also underestimates the displacement cost of moving existing businesses via the CPO process. The basic tenet of CPO is that unwilling sellers should not be economically disadvantaged. This will be difficult to achieve on the scale envisaged by the plan.

The brownfield policies appear to go beyond the definitions of SPP. This also has the consequence that the city will be relying excessively on the acquisition of brownfield sites currently in employment use in order to meet its need for housing land. The proposed plan indicates that the city will use CPO powers in order to progress this policy. We understand this could lead to hundreds of existing businesses being required to relocate from areas identified by the plan. This will be a lengthy and challenging process with inevitable delays to sites.

The plan makes the achievement of 20 minute neighbourhoods a key outcome, defined as amenities being within a 800m walk. Again, the SPF recognises and supports the aspiration of 20 minute neighbourhoods but the plan should be overly prescriptive across the whole of the city. There will be locations where some forms of development - alternative leisure uses for example, will support the regeneration of core high street locations. But it may not be possible for all developments to achieve all of the tenets of affordable housing demands, mixed-use developments and 20 minute neighbourhoods. The city must ensure that its planning policies do not constrain developments that can complement other uses.

The target of a minimum contribution of 35% affordable housing for all new development will potentially make projects unviable and deter investment to the city.

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

We seek a change to the minimum affordable housing target because we feel it will be unachievable for many development projects and will therefore conflict with other policy aspirations. This could include a failure to support much needed new purpose built student accommodation, new forms of residential investment that could support the creation of new communities, such as build-to-rent, and to meet the needs of 'last-mile' logistics and distribution to support the city economy.

We also seek less emphasis within the plan on the use of CPOs to acquire and change employment land to housing land use. This policy, intended to avoid use of greenfield sites, will we believe only mean the dislocation of existing viable businesses for uncertain and lengthy housing land supply. There is a well tested process for the use of CPOs, and they have been successfully deployed to support specific regeneration objectives in the recent past (St James) but we do not agree that they should form part of standing development planning policies.

We would also like to see the plan better acknowledge that the 20 minute neighbourhood concept needs to be flexible, as not every site will be able to cater for all amenities within a 20 minute walk. Taken to its extreme the policy could inhibit potential town centre renewal. Similarly the mixed use development aspirations need to be cognisant of how commercial developments may complement other uses within a location, and therefore should not always be required to meet high barriers of housing supply requirements stipulated by the plan.

Where would you like to go next?

[Return to the City Plan 2030 - Representation Menu](#)

City Plan Outcomes

What City Plan 2030 outcome would you like to see in more detail?

[Proceed to Part 3 – Place-based policies](#)

City Plan 2030 Outcomes. A sustainable city which supports everyone's physical and mental wellbeing

If you would like to make a Representation on the above section of City Plan 2030, please complete the following questions. If not, please scroll to the bottom of the page where you can navigate back to the City Plan 2030 - Representation Menu.

Do you support this section of the plan?

Not Answered

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Where would you like to go next?

[City Plan 2030 Outcomes](#)

City Plan 2030 Outcomes. A city in which everyone lives in a home which they can afford

If you would like to make a Representation on the above section of City Plan 2030, please complete the following questions. If not, please scroll to the bottom of the page where you can navigate back to the City Plan 2030 - Representation Menu.

Do you support this section of the plan?

No

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Please set out precisely what changes should be made to this section of the plan?:

Paragraphs 2.93, 2.103 and 2.110

The strategy for achieving affordable housing targets through use of CPOs on employment land sites is not likely to achieve the stated targets within the intended timescales. CPOs are a resource intensive and uncertain process, especially where land is in existing use and occupied.

Also, from discussions with industry experts, we feel the aspirations for rate of production and the delivery of all of these sites is unrealistic. The plan for housing delivery is also highly dependent on a number of recently added proposals which were previously allocated to employment uses.

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

We would like to see a more realistic analysis of the rate of production of new homes, including affordable housing. It would be helpful to see an analysis of alternative strategies should the primary policy of reallocation of new employment and in-use employment sites fail to deliver the scale and rate of housing supply proposed by the plan.

Where would you like to go next?

City Plan 2030 Outcomes

City Plan 2030 Outcomes. A city where you don't need to own a car to move around

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Do you support this section of the plan?

Not Answered

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Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

City Plan 2030 Outcomes

City Plan 2030 Outcomes. A city where everyone shares in its economic success

If you would like to make a Representation on the above section of City Plan 2030, please complete the following questions. If not, please scroll to the bottom of the page where you can navigate back to the City Plan 2030 - Representation Menu.

Do you support this section of the plan?

No

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Please set out precisely what changes should be made to this section of the plan?:

Page 38, Paragraphs 2.142 to 2.148

We disagree with this section of the plan because it does not, we believe, fully represent several economic challenges including the requirement for industrial/logistics sites across the city. Neither does it appear to appreciate the scale of challenge for retail and leisure in the first half of the plan period, as the city recovers from the Covid-19 pandemic.

First, there has arguably been an historic under-investment in industrial/logistical premises within the city, with many industrial or logistical businesses instead being sited in Livingston and other regional locations. With the growing emphasis upon distribution we feel there should be more focus on supporting logistics across the city. Instead, industrial sites are to be subject to CPO for housing, so the city will need to find alternative sites within its boundaries for these dislocated businesses before seeking to grow the distribution economy.

Second, the plan should not overlook the need for the city to be able to support the experience economy, which Edinburgh is particularly dependent on. This will need significant reinvestment in the city centre as well as the towns. This will depend upon attracting investment and development capital not

just from the wider UK, but internationally. yet the wider plan requirements for significant contributions to housing and affordable housing, as well as other social infrastructure, will inhibit the appeal of Edinburgh to investors. Simply put, the investment case for many forms of development are already finely balanced and the addition of housing to most forms of commercial development, including student accommodation and the nascent build-to-rent sector, will be a potential barrier to much needed commercial investment.

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

We wish to see an analysis and understanding of the growth in demand for industrial and logistical sites. This should be based on identifying a net additional need for such employment in the city.

There should also be an understanding of the need to attract international investment if the city is to realise its ambitions for regeneration and renewal of its economy across the city.

Where would you like to go next?

City Plan 2030 Outcomes

Place-based Policies

What place-based policies would you like to see in more detail?

Central Edinburgh

Place-based Policies - Central Edinburgh

Edinburgh City Centre

Place 1 - Edinburgh City Centre Policy

Place 2 - Fountainbridge

Place 3 - Astley Ainslie

If you would like to make a Representation, please select the relevant place-based policy. If not, please select 'Return to the City Plan 2030 – Representation Menu'

Place 3 - Astley Ainsley

Place 1 - City Centre and Waverley Valley Representation

Do you support this policy?

Not Answered

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

Return to Place-based Policies – Central Edinburgh

Place 2 - Fountainbridge Representation

Do you support this policy?

Not Answered

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

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Where would you like to go next?

[Return to Place-based Policies – Central Edinburgh](#)

Place 3 - Astley Ainsley Representation

Do you support this policy?

Not Answered

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

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Where would you like to go next?

[Return to the City Plan 2030 - Representation Menu](#)

Environment and Design Policies

What Environment and Design policies would you like to see in more detail?

Development Design (policies Env 1 to 5)

Environment and Design Policies - Development Design

Env 1 Design Quality and Context

Env 2 Co-ordinated Development

Env 3 Development Design – Incorporating and Enhancing Existing and Potential Features

Env 4 Development Design – Impact on Setting

Env 5 Alterations, Extensions and Domestic Outbuildings

If you would like to make a Representation, please select the relevant Development Design Policy. If not, please select 'Return to the City Plan 2030 – Representation Menu'

[Return to the City Plan 2030 - Representation Menu](#)

Development Design section Representation

Do you support this section of the plan?

Not Answered

If you do not support this section, please set out precisely what changes should be made to this section of the plan? (Please reference policy, paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

[Return to Environment and Design Policies - Development Design](#)

Env 1 Design Quality and Context Representation

Do you support this policy?

Not Answered

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

[Return to Environment and Design Policies – Development Design](#)

Env 2 Co-ordinated Development Representation

Do you support this policy?

Not Answered

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

[Return to Environment and Design Policies – Development Design](#)

Env 3 Development Design – Incorporating and Enhancing Existing and Potential Features Representation

Do you support this policy?

Not Answered

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

[Return to Environment and Design Policies – Development Design](#)

Env 4 Development Design – Impact on Setting Representation

Do you support this policy?

Not Answered

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

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Where would you like to go next?

Return to Environment and Design Policies – Development Design

Env 5 Alterations, Extensions and Domestic Outbuildings Representation

Do you support this policy?

Not Answered

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

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Where would you like to go next?

Return to Environment and Design Policies – Development Design

Environment and Design Policies - The Historic Environment

The Historic Environment

Env 10 Listed Buildings - Demolition

Env 11 Listed Buildings - Setting

Env 12 Listed Buildings and structures – Alterations and Extensions

Env 13 Conservation Areas – Demolition of Buildings

Env 14 Conservation Areas - Development

Env 15 Historic Gardens and Designed Landscapes

Env 16 Protection of Important Archaeological remains and the historic environment

Env 17 Development of Sites of Archaeological Significance

If you would like to make a Representation, please select the relevant Historic Environment Policy. If not, please select 'Return to the City Plan 2030 – Representation Menu'

Return to the City Plan 2030 - Representation Menu

Housing Policies

What Housing policy would you like to see in more detail?

Proceed to Part 3 - Infrastructure and Transport Policies

Hou 1 Housing Policies - Housing Development

Hou 1 Housing Development

Do you support this policy?

No

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Hou 1, Page 121, Paragraph 3.176

We understand the need to use CPO powers to support regeneration where necessary, but we are concerned that the emphasis upon brownfield as opposed to 'greenfield' means that this becomes a singular option for the council. The CPO process is often lengthy and time-consuming and could well lead to serious delays in site acquisition if existing occupiers challenge the CPO.

The council should also not be rigid in its approach to requiring housing as part of retail or leisure developments as proposed under Econ 2 and referred to in this paragraph. The challenge of making such developments viable at all brings this policy into question.

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

The CityPlan must have a resolute focus on what is deliverable. We propose therefore that the requirement for commercial developments above 0.25 h.a. to be required to support affordable housing contributions should be dropped as a policy. We would prefer any requirement for affordable housing contributions to be done on a selected basis, in discussion with potential commercial developers where the council believes there is a viable case for affordable housing contributions.

Where would you like to go next?

[Return to Housing Policies](#)

Hou 2 Housing Policies - Affordable Housing

[Hou 2 Affordable Housing](#)

Do you support this policy?

Not Answered

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

[Return to Housing Policies](#)

Hou 3 Housing Policies - Mixed Communities

[Hou 3 Mixed Communities](#)

Do you support this policy?

No

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Hou 3, Mixed communities, Paragraph 3.181

Build to rent is still a nascent market. Wider Scottish Government policies have arguably delayed the development of this new market in Edinburgh, and

further reforms identified in the programme for government may further delay the growth of BTR in the city. The intention of BTR is provide a new form of housing product to meet market needs. It is therefore intended to complement and improve on the existing mix of homes for private ownership, smaller scale PRS and affordable/social housing. But at this very early stage of its establishment in the wider housing market, the sector needs encouragement and support, not burdens if it is to take root in the city successfully and fulfil its potential to bring forward significant numbers of quality homes.

The council should seek affordable housing contributions where a project can sustain the cost and still deliver. Unlike mainstream housing developments, BTR are a long term investment where capital outlay will be repaid over a longer timeframe than is the case for housing built for private ownership. The council must therefore exercise flexibility over new proposals for purpose built private rented accommodation. Otherwise, the city will risk becoming uncompetitive and may see investors prefer other locations for potential BTR developments.

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

A rigid imposition of a 35% affordable housing contribution on all BTR developments for more than 12 units will risk proposals being unviable from the outset, and therefore not deliverable. The added requirement for 20% of the units to be made available for larger families may also fail to support the viability of some BTR opportunities.

We believe that these objectives should be discussed with BTR developers and investors on a project basis, with a view to requirements for larger family units and affordable housing contributions considered as part of much bigger mixed development proposals, and considered in relation to how a BTR proposal complements existing housing proposals and supply.

Where would you like to go next?

[Return to Housing Policies](#)

Hou 4 Housing Policies - Housing Land Supply

Hou 4 Housing Land Supply

Do you support this policy?

Not Answered

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

[Return to Housing Policies](#)

Hou 5 Housing Policies - Conversion to Housing

Hou 5 Conversion to Housing

Do you support this policy?

Not Answered

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

[Return to Housing Policies](#)

Hou 6 Housing Policies - Student Accommodation

Hou 6 Student Accommodation

Do you support this policy?

No

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Hou 6 - Page 123, Paragraph 3.186 and paragraph 3.188

The requirement to contribute to housing and affordable housing at this threshold makes it unlikely that larger scheme purpose built student accommodation developments will be viable. This will negatively impact the supply of quality student accommodation that is urgently required to support the continued success and growth of the city's higher education sector.

If adopted, this policy will make it hard to propose any new PBSA to meet the city's student accommodation demand, unless it is a smaller proposal that would come below the 0.25 ha size, which would be at a size of 100 or so beds. However, developers need to attract investors and the investment appetite for student accommodation is mostly fixed on much bigger developments. Taking these factors together therefore, the city is in danger of choking off the ability of the development industry to deliver critically needed student accommodation.

Within Housing Policy Hou 6, we believe the requirement to limit studio flats to no more than 10% of a development is also overly prescriptive. Students are not monoform - and some postgraduates for example may well wish to have the private studio accommodation in preference to more communal accommodation set-ups.

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Paragraph 3.186

To retain the viability of the purpose built student accommodation sector the policy of requiring mixed communities for a development above 0.25ha must be dropped. Otherwise the policy risks losing vitally needed new investment in the PBSA market, that is urgently needed to support the city's higher education sector.

The policy Hou6 reference to no more than 10% studio flats should also be removed. It is unnecessary and overly prescriptive. This restriction could remove the opportunity to develop student accommodation that might be targeted at bespoke forms of student requirement, such as postgraduates.

Where would you like to go next?

[Return to Housing Policies](#)

Hou 7 Housing Policies - Loss of Housing

Hou 7 Loss of Housing

Do you support this policy?

Not Answered

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

[Return to Housing Policies](#)

Hou 8 Housing Policies - Inappropriate Uses in Residential Areas

Hou 8 Inappropriate Uses in Residential Areas

Do you support this policy?

Not Answered

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

[Return to Housing Policies](#)

Hou 9 Housing Policies - Sites for Gypsies, Travellers and Travelling Showpeople

Hou 9 Sites for Gypsies, Travellers and Travelling Showpeople

Do you support this policy?

Not Answered

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

[Return to Housing Policies](#)

Infrastructure and Transport Policies

What Infrastructure and Transport policies would you like to see in more detail?

Community Facilities and Transport Infrastructure (policies Inf 1 to 5)

Infrastructure and Transport Policies - Community Facilities and Transport Infrastructure

Inf 1 Access to Community Facilities

Inf 2 Loss of Community Facilities

Inf 3 Infrastructure Delivery and Developer Contributions

Inf 4 Provision of Transport Infrastructure

Inf 5 Location of Major Travel Generating Development

If you would like to make a Representation, please select the relevant Community Facilities and Transport Infrastructure Policy. If not, please select 'Return to the City Plan 2030 – Representation Menu'

[Return to the City Plan 2030 - Representation Menu](#)

Community Facilities and Transport Infrastructure section Representation

Do you support this section of the plan?

Not Answered

If you do not support this section, please set out precisely what changes should be made to this section of the plan? (Please reference policy, paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

Return to Infrastructure and Transport Policies – Community Facilities and Transport Infrastructure

Inf 1 Access to Community Facilities Representation

Do you support this policy?

Not Answered

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

Return to Infrastructure and Transport Policies – Community Facilities and Transport Infrastructure

Inf 2 Loss of Community Facilities Representation

Do you support this policy?

Not Answered

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

Return to Infrastructure and Transport Policies – Community Facilities and Transport Infrastructure

Inf 3 Infrastructure Delivery and Developer Contributions Representation

Do you support this policy?

Not Answered

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

Return to Infrastructure and Transport Policies – Community Facilities and Transport Infrastructure

Inf 4 Provision of Transport Infrastructure Representation

Do you support this policy?

Not Answered

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

Return to Infrastructure and Transport Policies – Community Facilities and Transport Infrastructure

Inf 5 Location of Major Travel Generating Development Representation

Do you support this policy?

Not Answered

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

Return to Infrastructure and Transport Policies – Community Facilities and Transport Infrastructure

Economy Policies

What Economy policies would you like to see in more detail?

Economic policies (Econ 1 to 7)

Economy Policies - Economic

Econ 1 Supporting inclusive Growth, innovation and culture

Econ 2 Commercial development

Econ 3 Office Development

Econ 4 Business and Industry Areas

Econ 5 Employment Sites and Premises

Econ 6 Hotel Development

Econ 7 Goods distribution hubs

If you would like to make a Representation, please select the relevant Economic Policy. If not, please select 'Return to the City Plan 2030 – Representation Menu'

Econ 5 Employment Sites and Premises

Economic section Representation

Do you support this section of the plan?

Yes

If you do not support this section, please set out precisely what changes should be made to this section of the plan? (Please reference policy, paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

[Return to Economy Policies - Economic](#)

Econ 1 Supporting inclusive Growth, innovation and culture Representation

Do you support this policy?

Not Answered

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

[Return to Economy Policies - Economic](#)

Econ 2 Commercial development Representation

Do you support this policy?

No

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Econ 2, Page 134, Paragraph 3.232

The policy does not recognise the negative impact that a 50% requirement for housing, of which 35% must be affordable housing, will have on the viability of commercial developments. We recognise that the policy is framed with the proviso that it should be invoked where compatible with the site project, but nonetheless we believe it is a significant factor that may be regarded negatively by potential investors. In short it is highly likely to make many commercial developments unviable.

This concern is increased by the extremely low threshold set for commercial developments to be brought within the scope of Econ 2. The 0.25 h.a. threshold is equivalent to 27,500 ft squared. This is little more than one or two floors in a traditional office block.

The principle of applying housing requirements on commercial sites is a blunt instrument most likely to deter investment in jobs and the wider economy.

To our knowledge, only the City of Westminster Council in London has a similar policy. Combined with the extremely low threshold for commercial developments to be required to make 50% of their proposal housing, it is likely to make future commercial developments very difficult to make viable if this adopted as a policy.

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

The potential benefits to housing and the wider economy by applying a 50% requirement for housing land will be outweighed by the loss of potential investments in the city. We believe the 50% requirement must be withdrawn.

At the very least, we believe the extremely low threshold of 0.25h.a. must be significantly increased to avoid making single block commercial developments rendered simply unviable to contemplate.

Where would you like to go next?

Return to Economy Policies - Economic

Econ 3 Office Development Representation

Do you support this policy?

Yes

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

We support the policy, but would caution against rigid planning requirements for offices to be added to developments led by other uses, that may struggle to secure office occupation for their location.

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

Return to Economy Policies - Economic

Econ 4 Business and Industry Areas Representation

Do you support this policy?

No

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Econ 4, Page 138, Paragraph 3.238

This section fails to recognise the urgent need for reinvestment in the industrial and distribution sector. In their latest annual review, Ryden have reported that much of the existing stock is old, on average forty years old. This stock will need refurbishing and possibly even entirely replacing. There is also an under-supply of existing premises or effective sites that will add to upwards rental pressures in the near term. And, as stated elsewhere in our response, the challenge of large scale relocation of existing businesses from their current premises will mean that new sites will need to be found before additional supply of much needed industrial sites.

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

We wish to see a more ambitious part of the plan to meet the growth in demand for industrial sites and distribution of goods from the online economy. At the same time the city will need to recognise the impact of relocation from other employment sites as land is reallocated for housing. Neither of these factors are represented under Econ 4 as it now stands.

Where would you like to go next?

[Return to Economy Policies - Economic](#)

Econ 5 Employment Sites and Premises Representation

Do you support this policy?

No

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Econ 5, Page 135-136, Paragraphs 3.239 - 3.241

While the SPF supports the principle of mixed-use developments, we fear that this policy could threaten to remove key commercial sites from the city centre. This could include important sites to redevelop leisure uses which will be vital to supporting the experience economy that is vital to the wider economic success of the city.

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

This policy should be rephrased to be clear that key sites for purely commercial uses, critical to the wider attraction of Edinburgh as a destination for major corporate occupiers, for industrial sites and for retail and leisure uses.

Where would you like to go next?

[Return to the City Plan 2030 - Representation Menu](#)

Econ 6 Hotel Development Representation

Do you support this policy?

Yes

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

[Return to Economy Policies - Economic](#)

Econ 7 Goods distribution hubs Representation

Do you support this policy?

Yes

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

We believe the city will come under considerable pressure to support the creation of goods distribution hubs. This will be driven by the online economy but will need to be supported by appropriate transport and energy infrastructure.

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

[Return to Economy Policies - Economic](#)

Economy Policies - Retail

[Re 1 Town Centres First Policy](#)

[Re 2 City Centre Retail Core](#)

[Re 3 Town Centres](#)

[Re 4 Alternative Use of Shop Units in the City Centre and Town Centres](#)

[Re 5 Local Centres](#)

[Re 6 Commercial Centres](#)

[Re 7 Out-of-Centre Development](#)

[Re 8 Alternative Use of Shop Units in Other Locations](#)

If you would like to make a Representation, please select the relevant Retail Policy. If not, please select 'Return to the City Plan 2030 – Representation Menu'

[Return to the City Plan 2030 - Representation Menu](#)

Re 1 Town Centres First Policy Representation

Do you support this policy?

Not Answered

If you do not support this policy, please set out precisely what changes should be made to this section of the plan? (Please reference paragraph and page number)

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

[Return to Economy Policies - Retail](#)

Proposals - Housing Proposals

[Table 2 - Housing Proposals](#)

Do you support this section of the plan?

Not Answered

If you do not support this section, please select below the Housing Proposal(s) your Representation refers to and set out precisely what changes should be made to this section of the plan.

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words for each proposal you are referring to)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

[Return to the City Plan 2030 - Representation Menu](#)

Proposals - Economy Proposals

Table 13 - Areas of Economic Importance

Table 14 - Network of Centres

Do you support this section of the plan?

Not Answered

If you do not support this section, please select below the Economy Proposal(s) your Representation refers to and set out precisely what changes should be made to this section of the plan

Please set out precisely what changes should be made to this section of the plan?:

Please set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words for each proposal you are referring to)

Set out clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. (maximum 2,000 words):

Where would you like to go next?

[Return to the City Plan 2030 - Representation Menu](#)

Appendices – Supporting Documents

Please select the Supporting Document you would like to see in more detail. Otherwise, please select 'Return to the City Plan 2030 – Representation Menu'

[Proceed to Proposals Map](#)

Submit Your Representations and Exit

You are about to exit City Plan 2030 - Proposed Plan's Period for Representation. If you ready to submit your Representations please select 'continue'. If not, please select 'Return to the City Plan 2030 - Representation Menu'

Not Answered