

## **CEC Consultation on Review of Edinburgh Design Guidance (Closing 16<sup>th</sup> June 2017)**

### **Comments on the Proposed Changes**

**1. General:** Textual and clarification changes are set out in pages 5-7 of the Review questionnaire, together with other alterations consequent on related changes in planning and environmental regulations. The document itself has been re-arranged to be more logical and easier to understand. A new Environmental Protection Section has been added, which is welcome.

**2. Section 2.4 – Design, Integration and Quantity of Parking:** This is a rewritten Section appearing now on pages 50 to 57 of the new Guidance, whereas it is page 93 onwards of the existing. The Edinburgh Parking Standards are a separate document referred to in the existing Guidance whereas their provisions are now incorporated in the new Guidance. This and other alterations are in general welcome, including the requirements for electric vehicle charging, but there is one fundamental change which needs very careful consideration. This is that, whereas the Edinburgh Parking Standards have previously been seen as a minimum provision in new developments (albeit themselves with some flexibility), there will now be no minimum provision and the parking standards set out in the revised Design Guidance, which seem to be similar to the existing requirements, are a maximum. This change is to discourage use of private cars and encourage use of public transport and shared transport such as car club.

The logic is understandable but this proposed change is open to exploitation by developers seeking to maximise financial return and minimise the cost of on-site amenities and facilities, to the detriment of good place-making. There may be a case for this change in large Major housing developments perhaps themselves justifying and requiring additional public transport provision. However even in these cases it is suggested that it will be necessary as part of the PAC process for a developer to set out what parking provision is to be made in order for the impact on the wider community to be assessed early on, so that if necessary enhanced parking provision can be incorporated before it is too late. For Local housing developments (less than 50 dwellings) there is no early consultation process, such as PAC, and communities may only learn of the impact on them of inadequate parking provision in a new development when a detailed planning application is submitted, too late then to influence the design process.

The Introduction to Section 2.4 includes the statement “Car parking maximums should be applied for all developments, though careful consideration must be given to mitigating potential parking over-spill to surrounding streets”. The revised Guidance recognises the risk to communities, but only makes very weak and inadequate provision to deal with it and surely this needs to be much stronger, if the proposed change is to be adopted.

**3. Section 2.12 – Purpose Built Homes for Rent:** This is a new section in the Guidance reflecting the significance of the “Built to Rent” (BTR) sector of the housing market. The provisions in general seem relevant and sensible. Page 79 sets out what is intended, but there is one area of concern, particularly where BTR developments may be proposed in close proximity to existing housing. On this page there are at least 3 references to the acceptability of a “flexible approach to current space and amenity standards” in BTR schemes and this acceptability could be used by developers to justify the omission of proper standards of space, amenity for tenants, parking, open space and waste and recycling facilities. This would be to the detriment of good place-making and why should lower standards be applied to the BTR market compared with normal housing standards?

There is already a worrying lowering of standards of provision in the now highly speculative purpose built student housing market, compared with the normal housing market requirements. Problems then arise when a market becomes saturated or changes, with as a consequence applications for change of use to normal market housing possibly creating the slums of tomorrow. It is suggested that this emphasis on the acceptability of a flexible approach to standards is not itself acceptable.

**4. Summary:** There is a lot in the revised Guidance to support, but there are two areas of concern justifying objection as set out above, subject to further detailed examination and comments from others.

**CEC Consultation on changes to Guidance for Householders**  
**Closing 2<sup>nd</sup> June 2017**

**Comments on the Update**

**1.** Many of the changes are textual and in the layout of the document, making it more logical and accessible and as such are to be welcomed. Some text has been clarified.

**2.** Specific changes are in “Step2 – Fitting it (addition or extension) on the site” as follows:-

Page 10 (of the new draft) “Gardens” – the minimum requirement of 30sq.m. remains, but there is no longer a minimum depth stipulated. However there is a requirement that what remains must be in keeping with the overall spatial pattern of the area. (This seems acceptable)

Page 11 “Bungalow Extensions” additional section added to retain character, be subservient and in keeping. (This seems acceptable)

Page 14 The previous Section headed “Decking and Balconies” has been expanded to include Roof Terraces, which seems sensible.

Page 19 The Section on Access and Parking has been expanded to included examples of smaller scale parking options for residential developments. Although the requirements in the text remain the same, the diagram of a front garden parking space in the current Guidance has been omitted in the Update.

**3.** So far therefore nothing has been noted justifying objection and, subject to comments from others, the proposed changes could be supported.