



Spatial Policy Team  
City of Edinburgh Council  
Waverly Court  
4 East Market Street  
Edinburgh  
EH8 8BG

16 June 2017

## City of Edinburgh Council – Review of Edinburgh Design Guidance

Dear Sir / Madam,

As you will be aware, Homes for Scotland (HFS) is **the** voice of the home building industry. With a membership of some 200 organisations together providing 95% of new homes built for sale in Scotland each year as well as a significant proportion of affordable housing, we are committed to improving the quality of living in Scotland by providing this and future generations with warm, sustainable homes in places people *want* to live.

HFS represents members on a wide range of issues affecting their ability to deliver much needed homes. HFS's views are endorsed by committees and advisory groups utilising the skills and expertise of key representatives drawn from member companies. HFS therefore welcomes the invitation to comment on the various draft Edinburgh Design Guidance.

HFS generally welcomes the guidance set out within the draft Edinburgh Design Guidance and specifically welcomes the further alignment of Edinburgh's expectations regarding the design of new residential developments with the national drive to create better places. HFS has little specific comment to offer on the detail of the draft guidance other than request that this is endorsed as a corporate position with all Council Services recognising the primacy of this document in setting out how design solutions are expected to be formulated, particularly with regard to highway design and parking standards. HFS would also anticipate that all previous design guidance will now be fully superseded by this updated Edinburgh Design Guidance and that any future updates of legislation and guidance referred to within this guidance will be updated as necessary to ensure that this consolidated document remains a material consideration and relevant.

We note the reference to Designing Streets under the policy context introduction to the draft guidance. We welcome this reference, but would also mention that ongoing discussions with the HFS Technical Group would support the adoption of the SCOTS National Roads Guidance as the primary guide for roads design, and we would

therefore welcome the addition of a reference to the SCOTS guidance alongside Designing Streets in this guidance.

It would also be helpful to understand whether City of Edinburgh Council has fully adopted the principles of Designing Streets as members of the HFS Technical Group have noted difficulties in achieving true Designing Streets across many authorities where the local authority has pulled back on design aspects like street furniture or other landscaping due to maintenance costs; roads engineers have not adopted latest roads design guidance; or roads engineers have made material changes to the geometry of roads layouts post-planning consent. Whilst not a specific Edinburgh concern, it could be helpful to include a specific reference to the authority's full adoption of Designing Streets if this is supported by the Council, to add clarity.

With regards to attenuation, we consider the wording to be too tight. There are a number of brownfield sites in the centre of Edinburgh where it is very difficult to achieve any form of attenuation. We suggest that the wording should be looser for brownfield sites to allow flexibility to promote the delivery of these city centre gap sites with innovative drainage solutions.

Homes for Scotland fully endorses the comments submitted by the PRS Champion in response to this consultation. HFS supports the PRS Champion's aspirations that the Edinburgh Planning Design Guidance enables growth of BTR in order to meet local housing need and demand and the significant need for high-quality PRS accommodation across the city, and supports the proposed amendments suggested in the consultation response to build further flexibility into the PRS section of the guidance. We would also point out that national guidance is due to be published on Build to Rent later in 2017, and suggest that the relevant section of the Edinburgh Design Guidance is reviewed and updated if necessary in light of this guidance.

We trust the above is of assistance in formulating finalised Edinburgh Design Guidance and HFS remain open to further engagement on this and all aspects related to the delivery of new homes within the City.

Yours sincerely

Nikola Miller  
Principal Planning Advisor