

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

Supporting Info   
Email

Choice **1 A**

**We want to connect our places, parks and green spaces together as part of a city-wide, regional, and national green network. We want new development to connect to, and deliver this network. Do you agree with this? - Select support / don't support**

Short Response

**Explanation** It is reasonable to expect new development to play its part in the provision of green space (linked to the specific requirements of that new development) and that that green space would help enhance the green network of the city. It is not reasonable however to expect new development to deliver the network. There are a number of policy proposals in this document that are required to be delivered by new development. All of these add addition cost and so a viability and deliverability assessment needs to be carried out to ensure that when added together the cost of all the policy asks do not preclude development from coming forward.

Choice **1 B**

**We want to change our policy to require all development (including change of use) to include green and blue infrastructure. Do you agree with this? - Support / Object**

Short Response

**Explanation** This ambition is supported, however care must be taken to ensure that the feasibility, deliverability and viability of developments are not compromised via a blanket requirement for blue and green interventions on all sites. Policies will need to be flexible enough to ensure the circumstances of different sites are respected.

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Choice **1 C**

**We want to identify areas that can be used for future water management to enable adaptation to climate change. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice **1 D**

**We want to clearly set out under what circumstances the development of poor quality or underused open space will be considered acceptable. Do you agree with this? - Yes / No**

Short Response

Explanation

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Choice **1 E**

**We want to introduce a new 'extra-large green space standard' which recognises that as we grow communities will need access to green spaces more than 5 hectares. Do you agree with this? - Yes / No**

Short Response

**Explanation** It is unclear what the impact of this policy change would be on climate adaption, the health and wellbeing of the city, and the ability of new residents to access quality green spaces that meet their needs. This needs to be better understood before a decision is made on the best course of action. Evidence is required. A bigger green space is not necessarily a better or more usable green space. Green space should be judged on quality over quantity and meeting the specific needs of the surrounding community is critical regardless of size. Edinburgh is a compact city with a finite amount of space (unless substantial additional greenfield and greenbelt sites are identified for development) and so a careful balance is required in respect of land requirements to meet housing and economic development needs and what is required for open space to ensure the continued attractiveness of the city. This proposal does not appear to be supported by the OPEN SPACE 2021 council strategy. A policy change as proposed should be accompanied by evidence that Edinburgh needs additional extra large green spaces. Is there evidence that access to extra large green spaces is more beneficial in terms of health and wellbeing of residents when compared to higher quality spaces at a smaller scale? With a potential focus on urban sites to meet future housing needs, has this policy requirement been tested to ascertain if it is actually deliverable? Also, has the impact on viability and deliverability of new developments been tested? Clarity is needed on whether the council would be adopting and maintaining these new spaces or whether the cost of this to be a burden on new householders through private factoring arrangements. This could in turn affect affordability in real terms and negate benefits achieved through other efforts in this regard.

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Choice 1 F

**We want to identify specific sites for new allotments and food growing, both as part of new development sites and within open space in the urban area. Do you agree with this? - Yes / No**

Short Response

**Explanation** The allotment strategy identifies more demand than there are plots and waiting lists are high particularly in relation to the higher-density tenement areas of the city. There is therefore a pre-existing problem that the Council will need to deal with. In order to understand what is legitimately required to support new communities/developments some evidence should be provided that identifies the demand for allotments from new developments, particularly flatted developments, to inform policy on provision of allotments as part of new developments.

Choice 1 F

**We want to identify specific sites for new allotments and food growing, both as part of new development sites and within open space in the urban area. Do you agree with this? - Upload (max size 3mb)**

Short Response

**Explanation**

Choice 1 G

**We want to identify space for additional cemetery provision, including the potential for green and woodland burials. Do you agree with this? - Yes / No**

Short Response

**Explanation** This is a pre-existing problem and should be the responsibility of CEC. It should not be something that is required as a developer contribution.

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Name

Lichfields

Email

scotland@lichfields.uk

Response Type

Agent / Consultant

On behalf of:

Choice

1 H

**We want to revise our existing policies and green space designations to ensure that new green spaces have long term maintenance and management arrangements in place. Do you agree with this? - Yes/No**

Short Response

No

Explanation

This is yet another cost to a new householder who will have already paid for the provision of the new greenspace, which under these proposals could be extra-large, in the price of their home. A viability and deliverability assessment should be carried out in respect of all the proposed policies of the plan and set out against the ambition that Edinburgh will be a "A city which everyone lives in a home they can afford".

Choice

2 A

**We want all development (including change of use), through design and access statements, to demonstrate how their design will incorporate measures to tackle and adapt to climate change, their future adaptability and measures to address accessibility for people with varying needs, age and mobility issues as a key part of their layouts. - Yes / No**

Short Response

No

Explanation

It is unclear why this is required over and above Scottish Building Regulations requirements.

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Choice **2 B**

**We want to revise our policies on density to ensure that we make best use of the limited space in our city and that sites are not under-developed. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice **2 C**

**We want to revise our design and layout policies to achieve ensure their layouts deliver active travel and connectivity links. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice **2 D**

**We want all development, including student housing, to deliver quality open space and public realm, useable for a range of activities, including drying space, without losing densities. Do you agree with this? - Yes / No**

Short Response

Explanation

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Choice **3 A**

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

Short Response

**Explanation** This policy and the Local Development Plan needs to be clear that it is net zero carbon not zero carbon that is the target. The aims of this objective are broadly supported, however we query whether an approach that tracks but is not fully aligned with building regulations is appropriate. That said an assessment should be undertaken to determine the viability and deliverability of this policy in all development circumstances. If this is cost prohibitive, new development will not be allowed and Edinburgh's Housing crisis will be exacerbated, and its economic sustainability could be impacted upon. A balanced approach needs to be taken that means that such standards can be met but that not all development needs to meet them. The most pragmatic approach here would be a graded policy that states that development should strive to meet the Platinum standard but if that can't be met, and good reason can be made for this, the gold standard should be achieved. If the gold standard can't be achieved and good reason is given for this then the silver standard should be acceptable. If this isn't possible, the bronze standard should be deployed assuming that this is still acceptable when the development is judged against the other policies of the plan.

Choice **4 A**

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

Short Response

**Explanation** This is a worthy proposal but will be intensive and officer resource heavy. Will there be more planning staff employed to facilitate this in a timely manner? Without this commitment much needed development will be held up and the housing supply target will inevitably be missed. Recent experience of the new paid for pre-application service has highlighted the lack of staff time available to facilitate additional services. It is important that local place plans facilitate and do not delay development if housing needs are to be met.

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Choice **4 B**

**We want to support Local Place Plans being prepared by our communities. City Plan 2030 will set out how Local Place Plans can help us achieve great places and support community ambitions. - How should the Council work with local communities to prepare Local Place Plans?**

Short Response

**Explanation** It is important that local place plans facilitate and do not preclude/un-necessarily delay development if development needs are to be met within the plan period. With new housing land allocations there is a significant lead in time before they start delivering development. For housing sites this can significantly limit the amount of new homes that can be built within the plan period. Our own research has found that a scheme of 100-499 homes on average takes 4 years to deliver a new home; sites of 500-999 take 5 years to deliver their first and for larger sites (1000-1999) this can be 7 years from validation of first application to delivery of first home for occupation. For allocations made in this plan (assuming that the plan would be adopted in 2022) larger sites will therefore not start delivering homes until 2027-2031. If you add to this the time for a local place plan to be put in place, post adoption, this could delay delivery to the very end of the plan period. This will significantly limit the number of new homes that can be built within the plan period. A housing trajectory should be prepared that identifies all housing sites that the Plan will rely on to meet its housing needs, normal lead in times for planning permission and starts on site should be built in and for those sites where a local place plan is to be proposed the time anticipated to prepare this should also be built in. Based on this a review of the number of sites required to deliver the housing need over the plan period can be undertaken and allocations made accordingly. This will ensure that enough land is being identified to deliver the housing needs of the plan period.

Choice **5 A**

**We want City Plan 2030 to direct development to where there is existing infrastructure capacity, including education, healthcare and sustainable transport, or where potential new infrastructure will be accommodated and deliverable within the plan period. Do you agree with this? - Yes / No**

Short Response

**Explanation**



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Choice 5 B

**We want City Plan 2030 to set out where new community facilities are needed, and that these must be well connected to active travel routes and in locations with high accessibility to good sustainable public transport services. Do you agree with this? - Yes / NO**

Short Response

Explanation

Choice 5 C

**We want to reflect the desire to co-locate our community services close to the communities they serve, supporting a high walk-in population and reducing the need to travel. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice 5 D1

**We want to set out in the plan where development will be expected to contribute toward new or expanded community infrastructure. Do you agree with this? - Yes / No**

Short Response

Explanation

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Choice 5 D2

**We want to use cumulative contribution zones to determine infrastructure actions, costs and delivery mechanisms. Do you agree with this? - Yes / No**

Short Response

**Explanation** Further details are required on this particular approach and it should be fully consulted on within the context of the Elsick Supreme Court judgement (ref. [2017] UKSC 66). A full deliverability and viability assessment should be undertaken to determine whether or not the developer contribution asks contained within the whole plan are affordable within individual market areas within the city. This will prevent such contributions from precluding much needed development from coming forward and delivering the aims and objectives of the plan.

Choice 5 E

**We want to stop using supplementary guidance and set out guidance for developer contributions within the plan, Action Programme and in non-statutory guidance. Do you agree with this? - Yes / No**

Short Response

**Explanation** No comment

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Choice **6 A**

**We want to create a new policy that assesses development against its ability to meet our targets for public transport usage and walking and cycling. These targets will vary according to the current or planned public transport services and high-quality active travel routes. Do you agree with this? - Yes / No**

Short Response

Explanation Without further detail however it is not possible to comment fully on this proposal. Clarity in relation to the targets being pursued, the provisions to be made (and over what timescales); and, how this is to be funded is required. We suggest that a further consultation is required on the detail of this proposal before the Proposed City Plan is drafted and consulted on.

Choice **6 B**

**We want to use Place Briefs to set the targets for trips by walking, cycling and public transport based on current and planned transit interventions. This will determine appropriate parking levels to support high use of public transport. Do you agree with this? - Yes / No**

Short Response

Explanation If Place Briefs are to be used in this way rather than embedding the standards in the Local Development Plan itself then they must be completed without delay so they are available to inform development proposals from the day of adoption of the new Local Development Plan. Any delay this process until after the LDP is adopted could prevent much needed development coming forward in a timely manner and prevent housing targets from being met.

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Choice **7 A**

**We want to determine parking levels in development based on targets for trips by walking, cycling and public transport. These targets could be set by area, development type, or both and will be supported by other measures to control on-street parking. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice **7 B**

**We want to protect against the development of additional car parking in the city centre to support the delivery of the Council's city centre transformation programme. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice **7 C**

**We want to update our parking policies to control demand and to support parking for bikes, those with disabilities and electric vehicles via charging infrastructure. Do you agree with this? - Yes / No**

Short Response

Explanation

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Choice **7 D**

**We want to support the city's park and ride infrastructure by safeguarding sites for new park and ride and extensions, including any other sites that are identified in the City Mobility Plan or its action plan. Do you agree with this? - We want to support the city's park and ride infrastructure by safeguarding sites for new park and ride and extensions, including any other sites that are identified in the City Mobility Plan or its action plan.**

Short Response

Explanation

Choice **8 A**

**We want to update our policy on the Cycle and Footpath Network to provide criteria for identifying new routes. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice **8 B**

**As part of the City Centre Transformation and other Council and partner projects to improve strategic walking and cycling links around the city, we want to add the following routes (along with our existing safeguards) to our network as active travel proposals to ensure that they are delivered. Do you agree with this? - Yes / No**

Short Response

Explanation

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Choice **8 C**

**We want City Plan 2030 to safeguard and add any other strategic active travel links within any of the proposed options for allocated sites. We also want the City Plan 2030 to include any new strategic active travel links which may be identified in the forthcoming City Plan 2030 Transport Appraisal, the City Mobility Plan, or which are identified through this consultation. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice **8 C**

**We want City Plan 2030 to safeguard and add any other strategic active travel links within any of the proposed options for allocated sites. We also want the City Plan 2030 to include any new strategic active travel links which may be identified in the forthcoming City Plan 2030 Transport Appraisal, the City Mobility Plan, or which are identified through this consultation. Do you agree with this? - Upload new cycle routes**

Short Response

Explanation

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Choice **9 A**

**We want to consult on designating Edinburgh, or parts of Edinburgh, as a 'Short Term Let Control Area' where planning permission will always be required for the change of use of whole properties for short-term lets. Do you agree with this approach? - Yes / No**

Short Response

Explanation

Choice **9 B**

**We want to create a new policy on the loss of homes to alternative uses. This new policy will be used when planning permission is required for a change of use of residential flats and houses to short-stay commercial visitor accommodation or other uses. Do you agree with this? - Yes / No**

Short Response

Explanation

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Choice **10 A**

**We want to revise our policy on purpose-built student housing. We want to ensure that student housing is delivered at the right scale and in the right locations, helps create sustainable communities and looks after student’s wellbeing. Do you agree with this? - Yes / No**

Short Response

**Explanation**

There are 2 elements of this proposed policy change that are particularly concerning. The first is the requirement to deliver affordable housing alongside PBSA in locations that meet the needs of students, but not necessarily of affordable housing tenants; and the second, is the deliberate precluding of the private market from the provision of student accommodation in the city. It is unclear why the locational requirements of affordable housing is thought to be the same and harmonious with those of students. Students want to be near universities, nightlife and leisure facilities. Households in social rented housing are often families or older people who will ultimately have different housing requirements. Being close to their social networks, being located in areas with easy access to convenience retailing where their shopping needs can be met and near facilities such as doctors, playparks and schools are far more important to them. These are rarely found in city centre locations close to universities. In addition, there are the potentially conflicting life styles between residents and students, which quite often result in complaints. The proposed 50 % requirement for housing on unallocated sites, if adopted, will have a significant impact on the student housing sector in Edinburgh, as will the requirement for the accommodation to be built for and managed by a university or college.

It is unclear why the City Council are proposing to preclude private providers of PBSA from the city by requiring new accommodation to be managed by a university or college. The PBSA market is well established in the UK and the quality of the product is extremely high. Indeed, very often it is of a significantly higher quality than that provided by universities and the management of the facilities is first class. This is particularly important for non-European students who have extremely high expectations in terms the quality of accommodation they will accept. This proposed policy is potentially very damaging for the prosperity of the universities and colleges of the city and their attractiveness to foreign students. It will also have a devastating effect on the PBSA market in the city if private providers are excluded. Our research shows the potential demand for a further 5,170 bedspaces in the city. If these are not provided in purpose-built units, the impact on the housing stock in the city centre will continue to be felt. Many cities have for the past 10 years or more been embracing the development of purpose-built student accommodation to remove the pressure on popular residential areas from homes in multiple occupation (HMOs). Edinburgh is struggling to meet its mainstream housing needs and it would seem logical to put in place policies that allow the return of traditional housing stock to the mainstream market by providing more, not less, bespoke accommodation for students. Edinburgh is well reported as a ‘hotspot’ for investment in PBSA as demand continues to outstrip supply and this policy change, as proposed, will not adequately address the issue. A consequence of the proposed policy, whether intended or otherwise, is that speculative PBSA developments will drop off considerably with the ability to progress such schemes all but precluded.



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Choice **10 B**

**We want to create a new policy framework which sets out a requirement for housing on all sites over a certain size coming forward for development. Do you agree with this? - Yes / No**

Short Response

**Explanation** It is difficult to see how such a blanket approach would be good policy. It ignores deliverability and viability issues and the reality of the development process. On a large site where mixed-use development is proposed, housing may well be a component, but the site characteristics and development appraisal will dictate the mix. The application of a policy that requires at least 50% of the site to be housing, 35% of which will be affordable, is not realistic. Also what is not clear is what this is 50% of. Is it total floor area, is it land take? Within this context how will other requirements such as those for green space and perhaps extra-large green spaces be accommodated? This policy will not necessarily lead to good place making. Mixed-use development should be encouraged but should not be dictated in all cases. A mixed-use policy needs to be flexible to respond positively to each and every site in the city, a blanket dictation of the proportion of uses for sites over 0.25ha is not appropriate.

Choice **10 C**

**We want to create a new policy promoting the better use of stand-alone out of centre retail units and commercial centres, where their redevelopment for mixed use including housing would be supported. Do you agree with this? - Yes / No**

Short Response

**Explanation** A promotional policy maybe appropriate to encourage more mixed-use development, but not one that dictates that any redevelopment will require 50% housing.

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Choice **11 A**

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

Short Response

**Explanation** A viability and deliverability assessment should be undertaken to demonstrate that this policy requirement would be deliverable on urban and greenfield sites. If this policy renders a number of sites in the city undeliverable, then it may not have the desired effect of meeting housing need. If and increased proportion of affordable housing is to be required this would be more achievable if a broader range of products were considered under the affordable housing description – housing for over 55s and starter homes perhaps could be part of the mix.

Choice **11 B**

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

Short Response

**Explanation** If the plan is to be prescriptive on mix, then this must be based on need and demand. A thorough understanding of the market conditions across the city and the deliverability of different types and tenures in different locations must be better understood. As it stands, there does not seem to be any evidence on which to make these prescriptions. This work must be undertaken and consulted on with landowners and developers ahead of the proposed plan if this policy is going to be deliverable.

Customer Ref: 01441      Response Ref: ANON-KU2U-GW32-A  
Name: Lichfields  
Response Type: Agent / Consultant  
On behalf of:

Supporting Info:  
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Choice 12 A

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

Short Response: Option 3 (Blended)

**Explanation**

Further analysis of delivery rates of the identified sites in options A and B is required as neither of these scenarios on their own, when limited to the sites identified, can deliver the housing numbers required within the plan period. This is explained below. A blended approach will be needed but so will the allocation of additional sites. The Housing Land Audit shows a total effective land supply programmed to 2026 and a further 5371 units to be delivered beyond 2026. Delivery rates are up to 2930 per annum. This is short of the delivery rates required to meet the housing needs identified in the Choices 2030 document under all 3 options. Given this it is imperative that the new allocations proposed in the Choices 2030 document can deliver to make up the shortfall accumulated before the plan is adopted and then ensure that the full housing requirement can be met over the plan period. In order to do this it is critical that there are new sites available to deliver as early as possible in the plan period given the lead in times associated with gaining planning consent and with opening up new sites for development. In considering these options Lichfields have prepared a whole plan housing delivery trajectory setting out a realistic expectation for housing development from the identified sites in Option A and B. It allows a 2 year period to CPO/negotiate the Option A sites and it takes into consideration the anticipated time it takes to achieve planning permission and the time it then takes for new sites to deliver their first home. It also takes into consideration the differing build rates for Brownfield and Greenfield sites. Lichfields research identifies that on average greenfield sites deliver 50% more homes per annum than brownfield sites. The trajectory highlights that all the sites identified in the Housing Land Audit 2019 as effective; plus, all the sites identified in Option A; plus, all the sites identified in Option B; and, sites for a further 5841 new homes will be required to deliver the identified housing need over the plan period. This is because not all sites will be able to develop out within the plan period. Lichfields are currently advising both Crosswind Developments Ltd and Stirling Developments Ltd and these land owners have indicated a desire to work with CEC to enable early delivery of housing on their sites. If this was facilitated then the requirement for sites for additional homes could be reduced to 4257. The Housing Trajectory prepared that details this will be emailed to the planning policy team. That said the delivery of Option A sites, other than sites such as Crosswind which has a willing developer who is currently progressing and planning application, will be extremely difficult to achieve particularly if CPO powers are needed as this can be an extremely lengthy and uncertain process. As stated above the shortfall in housing sites required to meet the housing needs of the city within the plan period could not be delivered in full under option A. The Council's proposal under option A requires the CPO of businesses that are currently active in the city and this will bring added complications of having to find relocation options the scale of which will inevitably result in the need for greenfield land. It is also questionable whether displacing viable businesses is a truly sustainable approach. Moreover, it is hard to see how this could possibly be affordable within the context of ongoing budget cuts. The statements made in the Choices document with regards to option B are confusing. It is unclear why further greenfield release is stated as being "not an option". Travel to work data prepared by CEC 2016 shows that according to the 2011 census there are nearly 95,000 workers commuting in to Edinburgh everyday. (Source: Travel to Work: Commuting into, out of and within the City of Edinburgh March 2016, CEC) This is far from sustainable and cannot possibly help with Edinburgh's climate change ambitions. A more sustainable solution would be to try to accommodate as many of those workers as possible within the city so that active travel solutions could be better utilised. This should very

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much be an option if Edinburgh's climate change ambitions are genuine. Edinburgh should be planning for what it actually needs in terms of housing. This will of course require identification and allocation of greenfield sites which will require additional infrastructure to serve them; but with increased volumes of development comes increased revenues to the Council via Council Tax and developer contributions enabling such investments to be made. The allocation of sustainable greenfield sites capable of supporting local facilities and services should be the Council's priority once available and deliverable brownfield sites have been secured within the housing land supply. For a site to be deliverable within the plan period, it must have a willing owner and development industry interest in bringing it forward. Sites with existing viable uses really should not be considered for housing development, except in exceptional circumstances. In this respect Calderwood provides a unique opportunity and we very much support its inclusion regardless of what option is chosen given its proximity to the well-established development in West Lothian that is starting to deliver significant local facilities and services for this new community. It is stated that there is not market demand for the number of market homes required to deliver the affordable housing need under option B. But there is clearly significant demand as highlighted by the UK Cities House Price Index 2019 that shows Edinburgh houseprices growing by nearly 6% 2018-19 when highlighted by the UK Cities House Price Index 2019 that shows Edinburgh houseprices growing by nearly 6% 2018-19 when the UK average has been in the order of 2%. Edinburgh has a house price to earnings ratio of 7.4% which is higher than the UK average of 6.7% and significantly more than Glasgow at 3.7% and Aberdeen at 5.1%.

A cursory glance at the most recent NOMIS data in terms of weekly earnings (Edinburgh second only to London in 2019) shows that median earnings have risen by 15% in Edinburgh between 2012 and 2019. The number of businesses have increased by 29% in this same timeframe (Scotland by only 18% and GB at 27%). The actual number of workless households is down by 10,100 between 2012-2018 (19% down to 12.4%) which in percentage terms is lower than Scotland at 17.1% and GB at 14.3%. A further consideration should be the collection of commuted sums to pay for affordable housing development in areas where market housing will not be viable and/or on Council owned sites. This will reduce the concern about relying completely on market housing to deliver affordable units and will allow the Council to have control of the rate of development of affordable housing regardless of the capacity of the development industry to deliver market homes. A commuted sum often means that homes can be built in areas where there is need and where there are social networks to support new occupiers. If this can be coupled with the Council taking less than best for their own sites, it is possible to deliver significantly more affordable units than would be afforded on market sites where land is at a premium. Finally, it is unclear under option B why the Council would not acquire greenfield land to deliver affordable housing. As identified above a combination of greenfield and brownfield sites will be required to deliver the identified housing needs. Therefore a Blended approach as identified by option C will be required. It is critical that enough deliverable land in each category is identified with realistic development potential to meet the identified needs and the shortfall that will exist due to a lack of delivery up to the adoption of the plan and in the period before new allocations can begin to deliver. Finally a specific point on affordable housing. Based on the housing numbers quoted we can see that the Housing Land Audit (2019) has within it a 3.8 year supply only of land for affordable housing (6100/1600). If the unconsented land comes forward in the next couple of years and before the new plan is adopted it could provide a further 2300 new affordable homes (9200x25%) or a further 1.4 years worth of supply. This would enable the 5 year need to be met in absolute terms but leaves little flexibility. So, over the next 5 years the city will struggle to meet the affordable housing target that they have set themselves which in itself falls way below the need identified in HNDA2. Sites therefore need to be identified to satisfy the need for the remainder of the plan period. In identifying a target of 20,800 affordable homes to 2032 CEC will fall significantly short of the identified need of 44,586 in HNDA2.

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Response Type

Agent / Consultant

On behalf of:

Choice

12 B1

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

Short Response

Yes

Explanation

Choice

12 B2

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

Short Response

Not Answered

Explanation

Choice

12 B3

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

Short Response

Not Answered

Explanation

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Response Type

Agent / Consultant

On behalf of:

Choice

12 B4

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

Short Response

Not Answered

Explanation

Choice

12 B5

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

Short Response

Not Answered

Explanation

Choice

12 B6

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

Short Response

Not Answered

Explanation

Customer Ref:

01441

Response Ref:

ANON-KU2U-GW32-A

Supporting Info

Name

Lichfields

Email

scotland@lichfields.uk

Response Type

Agent / Consultant

On behalf of:

Choice

12 B7

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

Short Response

Not Answered

Explanation

Choice

12 B8

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

Short Response

Not Answered

Explanation

Choice

12 B9

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

Short Response

Not Answered

Explanation

Customer Ref:

01441

Response Ref:

ANON-KU2U-GW32-A

Supporting Info

Name

Lichfields

Email

scotland@lichfields.uk

Response Type

Agent / Consultant

On behalf of:

Choice

12 B10

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

Short Response

Not Answered

Explanation

Choice

12 BX

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

Short Response

Not Answered

Explanation

Choice

12 C

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

Short Response

No

Explanation



Customer Ref:

01441

Response Ref:

ANON-KU2U-GW32-A

Supporting Info

Name

Lichfields

Email

scotland@lichfields.uk

Response Type

Agent / Consultant

On behalf of:

Choice 12 C

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

Short Response

No

Explanation

Choice 12 C

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

Short Response

No

Explanation

Choice 12 D

Do you have a brownfield site you wish us to consider in the proposed Plan? - Brownfield sites upload

Short Response

No

Explanation

Customer Ref:

01441

Response Ref:

ANON-KU2U-GW32-A

Supporting Info

Name

Lichfields

Email

scotland@lichfields.uk

Response Type

Agent / Consultant

On behalf of:

Choice

13 A

**We want to create a new policy that provides support for social enterprises, start-ups, culture and tourism, innovation and learning, and the low carbon sector, where there is a contribution to good growth for Edinburgh. Do you agree with this? - Yes / No**

Short Response

Yes

Explanation

Choice

14 A

**We want City Plan 2030 to support the best use of existing public transport infrastructure in West Edinburgh and accommodate the development of a mix of uses to support inclusive, sustainable growth. We will do this through 'an area of search' which allows a wide consideration of future uses within West Edinburgh without being tied to individual sites. Do you support this approach? - Yes / No**

Short Response

Yes

Explanation

Choice

14 B

**We want to remove the safeguard in the existing plan for the Royal Highland Showground site to the south of the A8 at Norton Park and allocate the site for other uses. Do you agree with this approach? - Yes / No**

Short Response

Not Answered

Explanation

No comment

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **14 C**

**We want City Plan 2030 to allocate the Airport's contingency runway, the "crosswinds runway" for the development of alternative uses next to the Edinburgh Gateway interchange. Do you agree with this approach? - Yes / No**

Short Response

Explanation

Choice **15 A**

**We want to continue to use the national 'town centre first' approach. City Plan 2030 will protect and enhance the city centre as the regional core of south east Scotland providing shopping, commercial leisure, and entertainment and tourism activities. Do you agree with this? - Yes / No**

Short Response

Explanation The Town Centre first approach should be supported unless there are every good reasons for deviation from that. The policy should allow for some flexibility in that respect.

Choice **15 B**

**New shopping and leisure development will only be allowed within our town and local centres (including any new local centres) justified by the Commercial Needs study. Outwith local centres, small scale proposals will be permitted only in areas where there is evidence of a lack of food shopping within walking distance. Do you agree? - Yes / No**

Short Response

Explanation The Town Centre first approach should be supported unless there are every good reasons for deviation from that. The policy should allow for some flexibility in that respect.

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 15 C

**We want to review our existing town and local centres including the potential for new identified centres and boundary changes where they support walking and cycling access to local services in outer areas, consistent with the outcomes of the City Mobility Plan. Do you agree? - Yes / No**

Short Response

Explanation

Choice 15 D

**We want to continue to prepare and update supplementary guidance for our town centres to adapt to changing retail patterns and trends, and ensure an appropriate balance of uses within our centres to maintain their vitality, viability and deliver good placemaking. Instead we could stop using supplementary guidance for town centres and set out guidance within the plan. Which approach do you support? - Yes / No**

Short Response

Explanation

Choice 15 E

**We want to support new hotel provision in local, town, commercial centres and other locations with good public transport access throughout Edinburgh. Do you agree with this approach? - Yes / No**

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 15 G

**We could also seek to reduce the quantity of retail floorspace within centres in favour of alternative uses such as increased leisure provision and permit commercial centres to accommodate any growing demand. Do you agree with this approach? - Yes / No**

Short Response

Explanation

Choice 16 A1

**We want to continue to support office use at strategic office locations at Edinburgh Park/South Gyle, the International Business Gateway, Leith, the city centre, and in town and local centres. Do you agree? - Yes / No**

Short Response

Explanation

Choice 16 A2

**We want to support office development at commercial centres as these also provide accessible locations. - Yes / No**

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **16 A3**

**We want to strengthen the requirement within the city centre to provide significant office floorspace within major mixed-use developments. Do you agree? - Yes / No**

Short Response

Explanation

Choice **16 A4**

**We want to amend the boundary of the Leith strategic office location to remove areas with residential development consent. Do you agree? - Yes / No**

Short Response

Explanation

Choice **16 A5**

**We want to continue to support office development in other accessible locations elsewhere in the urban area. Do you agree? - Yes / No**

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 16 A5

**We want to continue to support office development in other accessible locations elsewhere in the urban area. Do you agree? - Do you have an office site you wish us to consider in the proposed Plan?**

Short Response

Explanation

Choice 16 B

**We want to identify sites and locations within Edinburgh with potential for office development. Do you agree with this? - Yes/No**

Short Response

Explanation

Choice 16 C

**We want to introduce a loss of office policy to retain accessible office accommodation. This would not permit the redevelopment of office buildings other than for office use, unless existing office space is provided as part of denser development. This would apply across the city to recognise that office locations outwith the city centre and strategic office locations are important in meeting the needs of the mid-market. Or we could Introduce a 'loss of office' policy only in the city centre. - Yes / No**

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 E1

**We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Support - Leith Strategic Business Centre**

Short Response

Explanation

Choice 16 E2

**We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Support - Newbridge**

Short Response

Explanation

Choice 16 E3

**We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Support - Newcraighall Industrial Estate.**

Short Response

Explanation



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

Supporting Info   
Email

Choice 16 E4

**We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Support - The Crosswinds Runway**

Short Response

Explanation

Choice 16 E5

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

Short Response

Explanation

Choice 16 E6

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

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 E7

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

Short Response

Explanation

Choice 16 E8

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

Short Response

Explanation

Choice 16 EX

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

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **16 F**

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

Short Response

**Explanation** Further work needs to be undertaken on this and a consultation carried out. There will need to be a very clear justification for the displacement of viable businesses to make way for new housing development. It must be made clear why the development of business space on greenfield sites to accommodate businesses displaced from urban sites is a better option than leaving existing businesses where they are and instead developing housing on the greenfield sites.

Choice **16 G**

**We want to continue to protect industrial estates that are designated under our current policy on Employment Sites and Premises (Emp 8). Do you agree? - Yes / No**

Short Response

**Explanation** In protecting industrial estates, it is important to assess whether or not the premises are still fit for purpose. There is little point in protecting industrial space that no occupiers want when there could be a viable use alternative.

Customer Ref: 01441      Response Ref: ANON-KU2U-GW32-A

Name: Lichfields

Response Type: Agent / Consultant

On behalf of:

Supporting Info:

Email: scotland@lichfields.uk

Choice      16 H

**We want to introduce a policy that provides criteria for locations that we would support city-wide and neighbourhood goods distribution hubs. Do you agree? - Yes / No**

Short Response: Not Answered

Explanation: Further work need to be done to identify where these will be and consultation carried out ahead of the proposed plan.