

Customer Ref: 00044 Response Ref: ANON-KU2U-GPGA-6
Name: Stuart Salter
Response Type: Agent / Consultant
On behalf of: Miller Homes and the Wheatlands Farming Partnership

Supporting Info:
Email: stuart@geddesconsulting.com

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: Yes

Explanation
We support the promotion of a city-wide, regional, and national green network in principle. However, it is noted that the green areas shown as Green Network on Map 1 – A connected, green Edinburgh are not part of the Green Network. These green areas represent the Edinburgh Green Belt. The parameters and the scope of the Green Network is yet to be defined and consulted upon by the Lothians & Fife Green Network Partnership, part of the Central Scotland Green Network. The emerging City Plan 2030 is required to build on the policy framework set out in the approved SESplan Strategic Development Plan (SDP) and the opportunities set out in the adopted Local Development Plan (LDP) as shown in Figure 5 Green Network. Ongoing compliance with these statutory planning requirements can be achieved through the allocation of new greenfield housing sites to provide opportunities to extend the existing green corridors or active travel routes into the wider countryside. Green network enhancement should be an integral part of all new City Plan 2030 housing proposals. Open Space 2021 remains the Council's adopted Open Space Strategy. Open Space 2021 requires to be updated in order to reflect the new Open Space Strategy proposed in the emerging City Plan 2030. The site promoted by Miller Homes and the Wheatlands Farming Partnership at Kirkliston East can contribute to the priorities of the wider Green Network for City Plan 2030. The detailed technical evidence to support the allocation of this site is set out in the site representation, which includes a comprehensive Development Framework Report as well as associated other documents, demonstrating the sustainability, effectiveness and deliverability of this site for housing led development.

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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 We support the provision of appropriate green and blue infrastructure in all new development. The Choices paper defines this as ...trees, living roofs, and nature-based drainage solutions including, ponds, swales, rain gardens and ecosystem services as well as making best use of natural features in the surrounding environment. This will require a new or updated policy framework in the emerging City Plan 2030. Compliance with these new requirements may prove challenging for brownfield developments. Brownfield sites, including change of use and regeneration, may be unable to meet any updated green and blue infrastructure set out in new policy requirements because of site constraints or existing infrastructure constraints. New greenfield housing development can provide new landscape planting and other green and blue infrastructure along water courses, coast and urban edge. This green and blue infrastructure will need to be managed through an appropriate policy framework as well as the proposed development briefs proposed to be set out in City Plan 2030.

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 In principle, identification of areas to be used for future water management can be supported. However, those areas will require to be identified through an appropriate water management strategy for the City. There are no supporting documents that identify a proposed water management strategy for the City. Ideally, such a document should be available for public consultation prior to becoming a part of the City Plan 2030. A draft water management strategy for the City will require prior consultation with Scottish Water (surface water management) and SEPA (flood risk attenuation) before inclusion in the emerging City Plan 2030.

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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 We cannot support the circumstances where the development of poor quality or underused open space will be considered acceptable until an update to the Open Space Audit 2016 has been completed and a revised Open Space Strategy to replace Open Space 2021 has been consulted upon.

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 City Plan 2030 will need to identify an appropriate policy framework to define publicly accessible and useable green / open space. To assist in this process, an update to the Open Space Audit 2016 by the Council is necessary to demonstrate the up to date availability and condition of existing green / open spaces within the City. Without this essential background evidence, it is not possible to develop either the strategy to deliver more large green spaces over 5 ha or develop development briefs for Greenfield sites to deliver this policy requirement. This requirement will also significantly impact on Brownfield sites. Without this evidence we therefore cannot support the a new 'extra-large green space standard' which recognises the need for communities to access green spaces of more than 5 hectares. Further clarification is required as to whether the Council's proposed requirement is for access to multiple green / open spaces amounting to 5 ha within an appropriate walking distance or for a whole 5 ha green / open space as part of the development brief for a greenfield site to be allocated for new development. The site promoted by Miller Homes and the Wheatlands Farming Partnership at Kirkliston East can contribute the 'extra-large green space standard' with access to green spaces of more than 5 hectares. The detailed technical evidence to support the allocation of this site is set out the site representation, which includes a comprehensive Development Framework Report as well as associated other documents, demonstrating the sustainability, effectiveness and deliverability of this site for housing led development.

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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

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

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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

Explanation All new greenspace provided in new developments is factored to provide proper management and maintenance in perpetuity. This is delivered through requirements set out in the Deed of Conditions for the incoming house owners and tenants. These legal requirements can also be imposed by the vendors of the land when it is sold for future development if allocated for housing in a local development plan. Where it is determined that green spaces are of regional importance, the Council should take a pivotal role in its long term maintenance and management.

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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

Explanation We support the principle that development should 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. It is noted that these principles are set out in Part 1 Section 2 A Plan to Protect and Enhance the Environment of the adopted LDP which continue to remain valid for City Plan 2030. A refresh of Figure 2 Current national and city sustainability targets will be required for City Plan 2030. Part 2 Section 2 Design Principles for New Development of the adopted LDP already provides a policy framework in accord with the statutory requirements of the approved SESplan SDP. Further, the Edinburgh Design Guidance (November 2018) sets out the clear requirements for new development as well as the provision of Design and Access Statements which are expected for all major planning applications as well as complex or significant local planning applications. The requirement for Design and Access Statement should continue to reflect this Council approved document. City Plan 2030 should therefore continue to adopt the existing policy framework set out in the adopted LDP which has regard to development quality, site layouts, public realm and landscape as well as the policy framework on open spaces and private spaces. This should build upon the policy framework set out in the Edinburgh Design Guidance (November 2018). We welcome Council feedback on the information already being provided in response to the existing policy framework to identify the need for further information or clarity on what is already being provided.

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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: No

Explanation

We support the aspiration to make best use of the limited space in our City and that sites are not under-developed. We also acknowledge that City Plan 2030 needs to provide for and maximise the benefits of being close to public transport services and along high-quality active travel routes. However, a policy setting minimum densities is not an appropriate strategy and would be in conflict with the approved SESplan SDP as well as national policy. The approved SESplan SDP identifies that City Plan 2030 should ensure protection for the character of existing settlements, should not undermine green belt objectives and should avoid diverting investment in infrastructure from other priorities. Scottish Planning Policy (SPP) is clear that planning should direct development to the right place. This requires spatial strategies within development plans to promote a sustainable pattern of development appropriate to the area. We understand that City Plan 2030 is seeking to revise its density policy as follows: • All housing development to achieve a minimum density of at least 65 dwelling per hectare (gross); • Housing development in identified areas to achieve a minimum density of 100 dwelling per hectare (gross); and • Vertical mix of undefined uses to support the efficient use of land. We understand that the identified minimum density of at least 65 dwelling per hectare (gross) is explained in the Housing Study (January 2020). This states that: The density of current and recent housing sites in Edinburgh is presented in the Monitoring Statement and Appendix 1 of Part 2a to this study provides examples of recent Edinburgh developments and applications. The average density of development over the last 10 years was 65 dwellings per hectare. Neither the Monitoring Statement nor the Housing Study Appendix 1 Density Examples present any evidence to support the conclusion that all housing development can achieve a minimum density of at least 65 dwelling per hectare (gross). There is also no evidence support for a minimum density of 100 dwelling per hectare (gross) in identified areas. Policy decisions based on a lack of evidence was a major criticism of the adopted LDP by the Scottish Ministers. In its Notice of Intention to Adopt (November 2016), the Scottish Ministers considered that ...development plan have a critical role to play in setting the direction for the future of our places and in contributing to the achievement of overarching objectives of sustainable growth inequalities. The policy decisions for City Plan 2030 must therefore be informed objective and transparent evidence. Otherwise, there is a real risk that the Scottish Ministers will direct the Council not to adopt the emerging LDP. Density should not be measured on the basis of gross site area. Instead, it should be reflective of the developable area of the site. The updated iteration of Edinburgh Design Guidance (January 2020), which has not been subject to public consultation, states: In order to ensure a consistent approach across the city, built density will be measured as follows: The density of dwellings per hectare is calculated by dividing the number of dwellings on site by the Development Site + Roads Area. Development Site + Roads Area (Ha) – is measured to middle of roads or other routes bounding the site. We understand that the figure of 65 dwelling per hectare (gross) has been derived by an assessment of the average density of all housing development across Edinburgh, built over the period from 2008 to 2018 based simply on number of dwellings built divided by the gross site area. This assessment included the following development types: • Brownfield; • Change of use; • Infill – cleared site; • Infill – garden; • Infill – other; • Greenfield – agricultural; • Greenfield – open space; • Greenfield – other; and • Infill – open space. It is also noted that the assessed dwellings built from sites range from a capacity of between 5

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homes to 983 homes. Although this assessment is comprehensive, it fundamentally does not take into account the policy requirements of development plan and national guidance. Separating out Brownfield from Greenfield sites is paramount to supporting the legitimacy of this assessment and the validity of any conclusions drawn. The type and scale of development, and the associated density, is also an important consideration. An updated assessment has been obtained from the Council. This includes completions from 2019, therefore presenting analysis over the period from 2008 to 2019. As a result, the figure of 65 dwelling per hectare (gross) across Edinburgh has decreased to 59 dwelling per hectare (gross). These sites (a mixture of Brownfield and change of use in the main) generate an average density of 306 homes per hectare (gross). It is not logical to compare this type of development and density to larger sites, be it Brownfield or Greenfield site. The concept of using the basic analysis to form a policy for minimum density across the City is severely flawed. When Brownfield and Greenfield sites are considered separately, the following densities are concluded: • Brownfield - 70 dwelling per hectare (gross); and • Greenfield – 30 dwelling per hectare (gross). Brownfield sites do not always require significant new supporting infrastructure. The gross area identified may only be that of the existing use prior to demolition or the area required for change of use / conversion. Greenfield sites generally require significant new supporting green and blue infrastructure, as well as roads and other development uses. Greenfield sites are also required to protect the character of existing settlements and should not undermine green belt objectives in accord with the development plan and national policy. The SESPlan SDP policy framework requires local settlement character to be maintained. Applying a typical gross to net ratio (assuming 70% of the site is “developable” – applicable to Greenfield and larger Brownfield sites) then that minimum density would rise to 93 homes per hectare (net). To achieve a density of 65 dwellings per hectare (net) would require a 50/50 mix across a site of 4 storey flats and 2 storey housing, but only if 2/3 of the housing is terraced. This will derive a layout providing predominantly smaller 1, 2 and 3 bed homes with little prospect for providing family housing. To achieve a density of 93 homes per hectare (net) or 65 per hectare (gross) would require a different design solution which would require a greater percentage of flats (around 75%) or much higher flatted buildings (around 6 storeys). Given that there will be a requirement for Greenfield release in order to meet the housing supply target, the principle of such minimum densities in Greenfield locations is not supported. Instead it would likely cause significant adverse impact to the local settlement character and setting of the City. This would be contrary to the approved SESplan SDP and national guidance. To achieve the proposed minimum density, City Plan 2030 would be required to adopt a standardised design approach driven solely by meeting density target. This is at odds with the built form of the City and how it has evolved into different character areas over time. This would be contrary to the approved SESplan SDP and national guidance. Further, there would be little scope for variety in housing mix and very little prospect of delivering much needed family housing in the City, and the minimum density proposed will require almost entirely smaller 1, 2 and 3 bed homes. It can therefore be concluded that a minimum density of at least 65 dwelling per hectare (gross) across Edinburgh is inappropriate and should not be adopted for City Plan 2030. There is no evidence to support a minimum density of 100 dwelling per hectare, even in some urban areas. This position is supported by Homes for Scotland, who have provided further research from EMA Architecture + Design and Rettie & Co. The current approved policy framework requires new housing development to be built at a density appropriate to its location, complying with any site specific development briefs. The Edinburgh Design Guidance (November 2018) sets out the clear requirements for the density of new development. The requirement for appropriate density should continue to reflect this document. A variation of Policy Hou 4 Housing Density for Edinburgh can support the City Plan 2030 aspirations, namely: • To make best use of the limited space in our City and that ensure sites are not under-developed; and • To provide for and maximise the benefits of being close to public transport services and along high-quality active travel routes. Adopting the Edinburgh Council evidence, Policy Hou 4 Housing Density may be amended to state: All new housing sites will be expected to be designed to ensure efficient use of land and optimise housing densities. The appropriate density will depend on local context. The accessibility of the site to public transport and other relevant services, and the need to encourage and support the provision of local facilities necessary to high quality urban living will

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support increased densities subject to site specific considerations. This should be achieved by using a full range of house types and sizes. City Plan 2030 needs to continue to comply with the policy framework in SESplan SDP. As well as factoring in compliance with this policy framework, there is a need to continue to adopt the existing policy framework set out in the adopted LDP which has regard to development quality, site layouts, public realm and landscape as well as the policy framework on open spaces and private spaces. This should build upon the policy framework set out in the Edinburgh Design Guidance (November 2018) and appropriate policy framework such as East Lothian LDP.

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: No

Explanation We support the principle of revising design and layout policies to achieve ensure their layouts deliver active travel and connectivity links. However, Part 2 Section 2 Design Principles for New Development of the adopted LDP and the Edinburgh Design Guidance (November 2018) already provides a policy framework in accord with the Edinburgh Council Street Design Guidance and the six qualities of successful places in SPP (as well as Designing Streets and Creating Places). City Plan 2030 should therefore continue to adopt the existing policy framework set out in the adopted LDP which has regard to development quality, site layouts, public realm and landscape as well as the policy framework on open spaces and private spaces. This should build upon the existing policy framework set out in the Edinburgh Design Guidance (November 2018) or should align with any updated national policy in due course.

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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: No

Explanation
We support the principle of all development to deliver quality open space and public realm, useable for a range of activities, including drying space, without losing densities. However, Part 2 Section 2 Design Principles for New Development of the adopted LDP already provides a policy framework in accord with the statutory requirements of the approved SESplan SDP. Further, the Edinburgh Design Guidance (November 2018) already sets out the clear requirements for new development to deliver quality open space and public realm, useable for a range of activities without losing densities. City Plan 2030 should therefore continue to adopt the existing policy framework set out in the adopted LDP which has regard to development quality, site layouts, public realm and landscape as well as the policy framework on open spaces and private spaces. This should build upon the policy framework set out in the Edinburgh Design Guidance (November 2018).

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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: Current Building S

Explanation
We support the aspiration for all buildings and conversions to meet the zero carbon / platinum standards as set out in the current Scottish Building Regulations. However, carbon reduction targets for new buildings and conversions needs to and should continue to sit within the Building Standards regulatory system and not the Planning regulatory system. Scottish Building Regulations only recognise the achievement of the next upper level once all aspects of that particular level have been included. The award of an overall upper level depends upon meeting all aspects, rather than allowing trade-offs to achieve a score, reinforcing the fact that sustainable outcomes rely on holistic integrated design. Meeting the Scottish Building Regulations levels of sustainability, be it Bronze, Silver, Gold or Platinum, requires detailed design with a specification of materials to be agreed and adopted. This is not a process currently undertaken through the Planning regulatory system. Accordingly, Policy Des 6 Sustainable Buildings remains an appropriate policy for City Plan 2030 subject to amendments in the supporting text. There is a risk that the City of Edinburgh would be alone in setting a different standard to that required across the rest of Scotland. The additional cost in meeting Platinum standard is estimated to be between £40k to £50k per dwelling. When this additional cost is taken together with other potential requirements referred to in the Choices document (including 35% affordable housing, vertical mix of uses, potential active travel connections, 5 hectares of open space), there will be significant issues with the viability of many developments, particularly Brownfield sites which already typically carry a higher cost. Until such time as Scotland wide approach is taken, with further discussion and direction from Scottish Government Building Standards Division, all buildings and conversions should meet the current Building Standards with a minimum sustainability level of Bronze in accord with the Building Standards Technical Handbook 2019. City Plan 2030 should therefore continue to adopt the existing policy framework set out in the adopted LDP and not impose its own Council standard.

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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: No

Explanation We support the aspiration to work with local communities to prepare Place Briefs for areas and sites within City Plan 2030. The Place Briefs should not solely be informed by the Council and the local community. There are many issues and requirements which can only be factored into a Place Brief by experienced developers and house builders. This also extends to service providers such as Scottish Water, Scottish Power, SGN and others. A sustainable and deliverable Place Brief only comes from comprehensive information assessment where physical constraints and limitations are fully known, shared and accepted by all parties. All parties, including landowners and developers, need to be involved in directing the look and feel of development and how the development will help deliver infrastructure required to support them. This is particularly relevant for strategic land releases. The proposed Place Briefs need to be informed by up to date data, adopted in a holistic manner that local communities can digest. Issues such as transport, education and healthcare infrastructure needs to be prepared adopting expert advice and evidence including that held by the private sector. For example, an existing problem with local infrastructure (access to appointments in medical practices) may be wholly unrelated to future development aspirations. Pre-application consultation remains a statutory element of the Scottish planning system and the development of Place Briefs should dovetail into this process. The Council needs to be open to the feedback from this communication process. In order to properly inform Place Briefs, City Plan 2030 must allocate sufficient housing land to meet the housing land requirements. Unfortunately, this essential process was not undertaken as part of the adopted LDP and the ability to implement successful site briefs that responded to the needs of local communities was missed by the Council. Accordingly, Policy Des 2 Co-ordinated Development remains an appropriate policy for City Plan 2030 subject to amendments in the supporting text. City Plan 2030 should therefore continue to adopt the existing policy framework set out in the adopted LDP.

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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: Not Answered

Explanation

The Local Place Plans are should not solely be informed by the Council and the local community. All parties, including landowners, developers and service providers, need to be involved in directing the look and feel of development and how the development will help deliver infrastructure required to support them. This is particularly relevant for the larger strategic land releases, as defined by SESplan SDP. The success and failure of community involvement efforts in implementing Local Place Plans can be linked in part to a community's level of readiness and existing level of social capacity and of course, a willingness to engage to deliver rather than oppose development. The preparation of the Local Place Plan may have the benefit of concentrating a great deal of discussion, argument, understanding and resolution in a very short time. Their success will depend on the right preparation being done to make that intensive effort worthwhile, and the timing being right, so that the proceedings in the planning and design process come neither too early nor too late. There will be some areas in Edinburgh that have the readiness and capacity to undertake these Local Place Plans. However, there will be some that do not. As a result, the Council needs to ensure that Local Place Plans for City Plan 2030 do not unintentionally misinform what the design, layout, and transport, education and healthcare infrastructure requirements should deliver. The proposed Local Place Plans need to be informed by up to date data, adopted in a holistic manner that local communities can digest. Issues such as transport, education and healthcare infrastructure need to be prepared adopting expert advice and evidence including information provided by the private sector and service providers. Pre-application consultation remains a statutory element of the Scottish planning system and the development of Place Briefs for allocated sites should dovetail into this process. The Council needs to be open to the feedback about this communication from those submitting the applications.

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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: Yes

Explanation We support the requirement for 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. We accept that the education, healthcare and transport infrastructure will be dependant on the development strategy adopted for City Plan 2030, either Option A Urban Area Sites, Option B Greenfield Sites or Option C Blended Approach. We are of the view that Option C remains the only viable Option presented to meet the housing requirements set by SESplan SDP which City Plan 2030 needs to comply with to determine the scale of housing required. Therefore, a mixture of the education, healthcare and sustainable transport infrastructure identified will be required to implement this development strategy. It is accepted that evidence presented in the Council's Housing Study is incomplete and a full education as well as transport infrastructure appraisal will be required to support City Plan 2030. Policy decisions based on a lack of evidence was a major criticism of the adopted LDP by the Scottish Ministers. In its Notice of Intention to Adopt (November 2016), the Scottish Ministers considered that ...development plans have a critical role to play in setting the direction for the future of our places and in contributing to the achievement of overarching objectives of sustainable growth inequalities. The policy decisions for City Plan 2030 must therefore be informed objective and transparent evidence. Otherwise, there is a real risk that the Scottish Ministers will direct the Council not to adopt the emerging LDP. It is noted that only two transport corridors have been identified as being suitable for the delivery of new transit-solutions to help deliver City Plan 2030 – the South East Edinburgh via BioQuarter (Corridor 3) and Towards Newbridge and IBG (Corridor 7). This is contrary to the Edinburgh Strategic Sustainable Transport Study (Phase 1). This Study identifies four transport corridors which transit-based options should be considered further for City Plan 2030. These are: • South East via BioQuarter (Corridor 3); • Granton (Corridor 6); • Newbridge (Corridor 7); and • West of Hermiston (Corridor 8). The Choices document has omitted both Granton (Corridor 6) and West of Hermiston (Corridor 8), which are determined as appropriate transit-based options. The Council has commissioned the preparation of evidence to inform City Plan 2030 as set out in the Study, however this evidence has effectively been ignored as set out in the Choices document. The Scottish Ministers expect that all evidence will be taken into account to achieve a robust and credible City Plan 2030. The Choices document therefore needs to align its development alongside transport corridors to align with the evidence presented in the Edinburgh Strategic Sustainable Transport Study (Phase 1). All four transport corridors need to be identified and planned for in City Plan 2030, taking account of the extent of the corridors identified in the Edinburgh Strategic Sustainable Transport Study. New housing development in locations that support the delivery of these transport corridors should be supported by the Council.

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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 We support the principle of City Plan 2030 setting 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. We note that the Edinburgh Health and Social Care Partnership will be preparing a Primary Healthcare Appraisal as part of City Plan 2030. The Council will be aware any financial contributions being sought for new community facilities, such as healthcare, need to meet all the tests of an acceptable obligation as set out in Circular 3/2012 Planning Obligations and Good Neighbour Agreements. There is need for the Council to be fully satisfied that its infrastructure requirements are assessed by a methodology which meets the tests in Circular 3/2012. The direction from Scottish Ministers to the Council not to adopt its draft Supplementary Guidance was fundamentally based on the Council being unable to evidence its impacts and relate this to its defined planning obligations.

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 We support 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. The Council will appreciate that many of City's existing residents will have access to essential infrastructure which will not necessarily meet that promoted for new housing developments. In particular, the Council will need to ensure that healthcare facilities take into account the market requirements necessary to deliver viable GP and other associated medical services. There needs to be an end user for any proposed healthcare facility. We are of the view that Option C remains the only viable Option presented. Therefore, a mixture of the education, healthcare and sustainable transport infrastructure identified will be required to implement this development strategy. Co-locating community services in some of the new allocations as part of a strategic network of agreed healthcare and other community infrastructure should then be identified as part of the development briefs in City Plan 2030.

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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 We support the principle of City Plan 2030 setting out where development will be expected to contribute toward new or expanded community infrastructure. For this to be viable, City Plan 2030 should allocate development sites that are strategic in scale and offer the potential for community infrastructure to be required and well utilised. The Council will be aware any financial contributions being sought for new or expanded community infrastructure would need to meet all the tests of an acceptable obligation as set out in Circular 3/2012 Planning Obligations and Good Neighbour Agreements.

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 We do not support the use of cumulative contribution zones to determine infrastructure actions, costs and delivery mechanisms. The Council will be aware that cumulative contribution zones were adopted for its Supplementary Guidance Developer Contributions and Infrastructure Delivery. Following examination by Scottish Ministers, direction was given to not to adopt and issue this document. The reasons given were: • The inclusion of details of healthcare actions, contributions and contribution zones within the Supplementary Guidance does not meet the requirements of regulation 27(2) of The Town and Country Planning (Development Planning) (Scotland) Regulations 2008. These matters are not expressly identified in a statement contained in the plan as matters which are to be dealt with in Supplementary Guidance; • It has not (on the evidence presented) been demonstrated that the contributions sought through the Supplementary Guidance, in particular levels of education and road transport contributions: • Fairly and reasonably relate in scale and kind to the proposed development; • Reflect the actual impacts of, and be proportionate to, the proposed development; • As presented, the Supplementary Guidance does not provide sufficient certainty that contributions sought on the basis of it will be always be used for the purpose for which they were gathered. In relation to contribution zones, Circular 3/2012 Planning Obligations and Good Neighbour Agreements is clear that contributions should relate to the proposed development either as a direct consequence of the development or arising from the cumulative impact of development. In order to establish this, it is important for the Council to have a robust evidence base to exhibit and demonstrate this relationship. The Council has failed to exhibit this evidence, even at appeal.

Customer Ref: Response Ref:
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On behalf of:

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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 We do not support the principle to stop using statutory supplementary guidance. The Council should not only set out guidance for developer contributions within the City Plan 2030 and the associated Action Programme. Guidance for developer contributions should certainly not be set out in non-statutory guidance. The direction from Scottish Ministers to not to adopt and issue the Supplementary Guidance Developer Contributions and Infrastructure Delivery supports this position. The Council needs to focus on developing its methodologies for assessing impacts on community infrastructure which are in accord with practices in Scotland and can demonstrate through evidence that the outcomes are in accord with the tests in Circular 3/2012. The Council is aware that it asked the Chief Planner for assistance in revising its education impact assessment methodology to allow consequential findings to be in accord with the tests of Circular 3/2012.

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 We do not support a new policy that assesses development against its ability to meet our targets for public transport usage and walking and cycling. Planning Advice Note 75 Planning for Transport Annex B Personal Accessibility Analysis provides the basis for identifying accessibility profiles for new development. City Plan 2030 should therefore continue to adopt the existing policy framework set out in the adopted LDP.

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On behalf of:

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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 We do not support using Place Briefs to set the targets for trips by walking, cycling and public transport based on current and planned transit interventions.Planning Advice Note 75 Planning for Transport Annex B Personal Accessibility Analysis provides the basis for identifying accessibility profiles for new development.City Plan 2030 should therefore continue to adopt the existing policy framework set out in the adopted LDP.

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 We support in principle the determination parking levels in development based on targets for trips by walking, cycling and public transport.Planning Advice Note 75 Planning for Transport provides the basis for analysing the existing situation or base case to understand and influence change in the type of journeys people take and how they make them. It provides a benchmark against which future options can be measured. In developing any new policies, City Plan 2030 should have regard to the following mechanisms and factors:•Accessibility Analysis (Annex B);•Location Policy; and•Mode Share Targets (Annex C).We understand that the Local Transport Strategy and the adopted LDP both are in accord with PAN 75. City Plan 2030 should therefore continue to adopt the existing policy framework set out in the adopted LDP as well as complying with existing national guidance and requirements.

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On behalf of:

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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 We support in principle the protection against the development of additional car parking in the city centre to support the delivery of the Council's city centre transformation programme. We assume that the City Centre remains the same as shown on Figure 1 LDP Spatial Strategy Summary Map of the adopted LDP.

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 We support in principle updating parking policies to control demand and to support parking for bikes, those with disabilities and electric vehicles via charging infrastructure. However, we do not consider that electric vehicles to be the sole solution to the City's transport issues. Whilst the use of electric vehicles should be encouraged, the Council should seek to reduce congestion as well as improving local air quality. Reducing congestion should therefore be the primary focus for City Plan 2030. This can be achieved through the allocation of new housing development, co-located with employment growth hubs, as well as enhancing existing public transport infrastructure in these locations. Planning Advice Note 75 Planning for Transport identifies that parking policies must be handled sensitively and adapted to particular local circumstances, for example through the development of a maximum and optional underpinning minimum parking standards. We understand that current policies on car and cycle parking which set minimum standards for car parking in accord with PAN 75. City Plan 2030 should therefore continue to adopt the existing policy framework set out in the adopted LDP as well as complying with existing national guidance and requirements.

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Supporting Info
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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

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

Customer Ref: 00044 Response Ref: ANON-KU2U-GPGA-6
Name: Stuart Salter
Response Type: Agent / Consultant
On behalf of: Miller Homes and the Wheatlands Farming Partnership

Supporting Info:
Email: stuart@geddesconsulting.com

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: Not Answered

Explanation: Not Answered

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: Not Answered

Explanation: Not Answered

Customer Ref: 00044 Response Ref: ANON-KU2U-GPGA-6
Name: Stuart Salter
Response Type: Agent / Consultant
On behalf of: Miller Homes and the Wheatlands Farming Partnership

Supporting Info:
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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: No

Explanation We support the principle to revise policy on purpose-built student housing. Policy Hou 8 Student Accommodation already determines whether the proposal is: • appropriate in terms of access to university and college facilities by walking, cycling or public transport; and • detrimental to the maintenance of balanced communities or to the established character and residential amenity of the locality. Whether a proposal can provide both market and affordable housing alongside student accommodations will depend on the scale of the site and the developer's investment intention. This will not be achievable in all instances. The need for any student proposal to be built for and managed by an Edinburgh based university or college will ultimately depend on their financing arrangements to maintain viable accommodation. Further detail, supported by evidence, will be required for City Plan 2030 should any amendment be made to Policy Hou 8 Student Accommodation.

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Response Type: Agent / Consultant
On behalf of: Miller Homes and the Wheatlands Farming Partnership

Supporting Info:
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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: No

Explanation

We support the principle of a new policy framework which sets out a requirement for housing on all sites over a certain size coming forward for development. We assume that this is a reference to ensuring that new housing sites (both allocated and windfall) are effective in terms of contributing completions within the plan period, and preferably within the next 5 year period. Whether a proposal for student housing, hotels, short-stay and other commercial business, retail and leisure developments will depend on the scale of the site and the developer's investment intentions. The development appraisal for a mixed use site is dependent on securing tenants for the units being created and then creating a financial covenant for future investors. It is very different viability assessment from the sale of land for housing. Introducing housing into a mixed use development may not be achievable in all instances. In mixed use developments, sites of 2.5 hectares (or more) being required to provide 1.25 hectares (or more) of housing will ultimately depend on their financing arrangements to maintain viable primary use i.e. hotels, short-stay and other commercial business, retail and leisure developments. We would advise that the Council if it wishes to promote housing in mixed use developments to adopt a range of housing numbers and adopt not site areas

City Plan 2030 should not unintentionally seek to stymie the primary use on these sites, undermining future investment in Edinburgh. Policy Hou 10 Housing Development allows for delivery of the housing on other suitable sites in the urban area, provided proposals are compatible with other policies in the adopted LDP. City Plan 2030 should therefore continue to adopt the existing policy framework set out in the adopted LDP which does not preclude the housing uses on such sites as part of mixed-use development.

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On behalf of:

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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 We support the principle of creating 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. For the reasons explained in the response to Question 2 above, City Plan 2030 should not seek to stymie the primary use on these sites, undermining future investment in Edinburgh. Policy Hou 10 Housing Development allows for delivery of the housing on other suitable sites in the urban area, provided proposals are compatible with other policies in the adopted LDP. This can apply also apply to out of centre retail units and commercial centres subject to amendments. City Plan 2030 should therefore continue to adopt the existing policy framework set out in the adopted LDP amending to Policy Hou 10 Housing Development to support housing uses on such sites as part of mixed-use development.

Customer Ref: 00044 Response Ref: ANON-KU2U-GPGA-6
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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: No

Explanation

We understand the Council's intention to the principle of amending the policy to increase the provision of affordable housing requirement from 25% to 35%. However, a policy setting the provision of affordable housing requirement at 35% would not accord with the approved SESplan SDP as well as national policy requirements in SPP. The approved SESplan SDP identifies that 25% of the total number of homes to be provided on each site as affordable housing. SPP is also clear that the level of affordable housing required as a contribution within a market site should generally be no more than 25% of the total number of houses. Affordable housing is defined broadly as housing of a reasonable quality that is affordable to people on modest incomes. SPP confirms that affordable housing may be provided in the form of social rented accommodation, mid-market rented accommodation, shared ownership housing, shared equity housing, housing sold at a discount and low cost housing without subsidy. It is noted that the approved SESplan SDP acknowledges that each local development plan area will have its own characteristics and significant variations in need. Therefore, City Plan 2030 will need to set out an appropriate approach for the provision of affordable housing taking account of local housing waiting lists and housing need and demand evidence. The Council will be aware that for the adopted LDP, the Reporter concluded that a percentage higher than 25% or an absolute requirement for on-site delivery would not be appropriate or realistic. The Reporter also identified that this does not prevent higher percentages of affordable housing being delivered where grant funding is available or where provision may be enabled through a social housing provider. This position is endorsed by Scottish Ministers. Therefore, any policy revisions for City Plan 2030 will have to confirm that any impact on the viability of the development will be taken into account and identify other ways of developers and house builders delivering their contribution to affordable housing provision where 35% is not achievable. An increase in affordable housing to 35% needs to take account of the level of grant funding available to build these affordable homes. Given the tenure mix for affordable homes, realistically more affordable homes may need to be low cost housing and not social renting. Golden share as a low cost housing initiative is an example of providing more affordable housing without the need for grant support. As the Council is aware, increasing affordable housing site also impacts on the need for a greater percentage of this housing tenure to fund the required community infrastructure through financial contributions. A minimum of 25% provision should still be referenced in the policy. Consideration should also be given to the nature of the tenure of the affordable housing required and the extent to which this can be met by proposals capable of development with little or no public subsidy. This is an important consideration for all land coming forward for other uses as set out in Choice 10 i.e. where a site is required to deliver at least 50% housing. A prescriptive affordable housing requirement for 35% may impact on viability and the deliverability of the primary use. Therefore, only low cost housing tenures specified in SPP should be applicable to meet the provision of affordable housing requirement if it is to be increased from 25% to 35%, with a minimum of 25% provision specified, and such amendments should be made to Policy Hou 6 Affordable Housing.

Customer Ref: 00044 Response Ref: ANON-KU2U-GPGA-6
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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: No

Explanation

We support the provision of a a mix of housing types and tenures. With regard to housing types, this has already been addressed in the Council’s aspiration to set densities for future housing developments. There needs to be flexibility in the mix of housing types and tenures and a prescriptive approach would likely undermine the development strategy of Edinburgh if these new homes do not respond to market demand or Scottish Government funding initiatives.

In our experience, the mix of housing tenure and types can change significantly over time. The local development plan period is 10 years and accordingly, the Council needs to avoid being overly prescriptive. For example, sheltered housing was once considered an acceptable form of social housing for the elderly but this type of housing is no longer actively promoted in development plans now. In addition, it is widely acknowledged that the housing need and demand outcomes are not wholly transferable to the planning system in terms of housing delivery. Currently, outcomes of housing need and demand covers only four tenures. The planning system identifies six tenures for affordable housing alone. The assumptions that underpin the outcomes from housing need and demand will respond to evolving economic and social circumstances over time, meaning that the outcomes based on one set of household projections and the underlying assumptions can change by the next set of projections. City Plan 2030 will therefore need a great deal flexibility to respond to the changing mechanics of the housing need and demand assessments and their outcomes as well as the mix of housing types and tenures of different locations across Edinburgh. Adopting a flexible approach to the provision of housing types and tenures is consistent with the requirements of SPP which acknowledges that planning can help to address the challenges facing the housing sector by providing a positive and flexible approach to development.

Policy Hou 2 Housing Mix allows for the provision of a mix of house types and sizes where practical, to meet a range of housing needs, including those of families, older people and people with special needs, and having regard to the character of the surrounding area and its accessibility. City Plan 2030 should therefore continue to adopt the existing policy framework set out in the adopted LDP and referred to in Policy Hou 2 Housing Mix.

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Choice 12 A

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

Short Response: Option 3 (Blended)

Explanation

We support the acknowledgement that City Plan 2030 needs to provide new homes for Edinburgh and further land will need to be allocated land for our new homes. However, we remain concerned about the approach that the Council has taken to identify the proposed housing supply target for City Plan 2030. This is confounded by the lack of any specific question in the Choices document relating to how the housing supply target should be derived and what evidence should be adopted to inform decision making. It is fundamental to the development strategy set out in City Plan 2030 that an appropriate housing supply target is derived in accord with a robust evidence base. The development strategy should then be identified to meet the housing land requirement. We note this is not the case as set out in the Choices document. The consultation questions gives no option to question the proposed housing supply target. The Council has identified a preferred strategy and then identified a housing supply target that bears no alignment of the evidence. That is not in accord with SPP. The Choices document sets out three different Options regarding housing development strategy for City Plan 2030. Those three Options are as follows: • Option 1 (Council/Partners/Urban Area) • Option 2 (Market/Greenfield) • Option 3 (Blended Approach) All three Options have different nuances and factors which lead to alternative conclusion. The Choices document clarifies how each Option is determined in the following sections: a. How many new homes does Edinburgh need? b. Who will deliver these homes? c. How to deliver our new homes in the most sustainable way The Housing Study presents further evidence to support conclusions reached for each Option. The detail contained within the Choices documents and associated Housing Study are discussed below. A. How many new homes does Edinburgh need? We acknowledge that the City Plan 2030 is required to accord with the policy framework of the approved SESplan SDP. The policy framework of the approved SESplan SDP identifies housing supply targets on an all tenure (or overall) basis. SPP also requires local development plans to indicate the number of new homes to be built over the plan period within the overall housing supply target. The Housing Study confirms this position. City Plan 2030 will also be required to identify an appropriate housing land requirement, adding a generosity margin of between 10% and 20% to the appropriate housing supply target. This position is supported by the conclusions reached during the Examination of the adopted LDP, which were subsequently endorsed by Scottish Ministers. The housing supply targets for City Plan 2030 are required to be based on the evidence presented in a housing need and demand assessment (HNDA). The approved SESplan SDP is informed by HNDA 1 (2011). SESplan SDP 2 was rejected by Scottish Ministers. However, that development plan was informed by a new HNDA 2 (2015). For City of Edinburgh, HNDA 2 identified that City of Edinburgh had a total estimate of housing need and demand of 81,685 homes from 2012 to 2032 (a 20 year period) based on the Wealth Distribution scenario. The Wealth Distribution scenario was identified as the preferred scenario by the SESplan Joint Committee, of which Edinburgh Council are a constituent member. We note that the Housing Study identifies that the HNDA 2 remains the most up to date assessment of future housing need and demand for Edinburgh over this period and the Council proposes that HNDA 2 will be used to determine how much of the remaining regional housing supply target should be met within Edinburgh. The HNDA Practitioners Guide identifies that that both the future need (household projections) and existing need must be met through the provision of additional housing units. Similar to the housing supply target, this is tenure blind. As set out in Table 1 Scenarios of Need and Demand 2019-2032 (HNDA2) of the Housing Study, HNDA 2 confirms that there are is need and demand of 81,685

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homes from 2012 to 2032. Taking account of housing completions to date from 2012 to 2019 at 9,184 homes, there is a remaining housing need and demand of 67,174 homes over the period 2019 to 2032. We note that the Choices document does not seek to identify or meet the evidenced housing need and demand. Instead, the suggested housing supply target relies on the remaining market housing element from HNDA 2 at 22,588 homes from 2019 to 2032 and advances the Councils affordable housing policy of 20,000 affordable homes by 2027 as the affordable housing element. This equates to the proposed all tenure (or overall) housing supply target of around 43,400 homes. It is noted that this housing supply target prepared for Option 1 (Council/Partners/Urban Area) assumes Brownfield delivery only led by ...the Council and its Partners. The Choices document sets out an alternative housing supply target for a different development strategy, Option 2 (Market/Greenfield). Again, is based around the Council's affordable housing policy but assumes that housing delivery is led by the private sector based on Greenfield releases only. This adds a market housing element of 32,000 homes to the Council's affordable target of 20,800 homes, equivalent to the proportionate market (65%) and affordable (35%) for new housing sites. This equates to the proposed all tenure (or overall) housing supply target of around 52,800 homes. Unfortunately, neither of these housing supply targets comply with national policy and guidance. The remaining housing need and demand identified from HNDA 2 is 67,174 homes over the period from 2019 to 2032. The two housing supply target Options presented by the Council fall significantly short of the unmet housing need and demand by either 23,774 homes (Option 1) or 14,374 homes (Option 2). The Council has not presented any evidence as to why City Plan should not seek to meet unmet housing need and demand in full by 2032. Following the rejection of SESplan SDP 2 by Scottish Ministers, there is no redistribution strategy or agreement from other constituent local authorities to absorb the balance of homes from Edinburgh that may not be met in City Plan 2030 as set out in Option 1 or Option 2. Therefore, any Option adopted by the Council should properly reflect the remaining housing need and demand in order to select an appropriate housing supply target. Based on the evidence presented in HNDA 2, Edinburgh needs 67,174 all tenure (or overall) homes. Who will deliver these homes? We acknowledge that the Choices document presents two proposed housing supply targets. The first is 43,400 homes to be delivered by the Council and its partners. The second is 52,800 homes to be delivered through market housing. It is noted that neither proposed housing supply target fully accounts for the outstanding housing need and demand of 67,174 homes from 2019 to 2032. The Choices documents considers that it has a total potential land to be available for 47,000 homes and the sources are identified as follows: • Land identified in housing land audit for affordable housing – 6,100 homes; • Land identified in housing land audit for market housing – 14,800 homes; • Other land in housing land audit (without consent) – 9,200 homes; and • Potential urban area land identified through Housing Study – 16,900 homes. This represents a total of 30,100 homes in the 2019 Housing Land Audit. an additional 16,900 homes on land within the urban area. Therefore, the Choices considers that there is effective housing land for 20,900 homes in the 2019 Housing Land Audit, a further 9,200 homes on land that are without consent in the 2019 Housing Land Audit. We have reviewed the 2019 Housing Land Audit. This document identifies an established housing land supply of 30,164 homes. From these 30,164 homes, the following is acknowledged: • Under Construction – 6,886 homes; • Consent – 7,471 homes; • No Consent – 8,022 homes; • Small Sites – 317 homes; and • Constrained – 7,468 homes. Sites with a total capacity of 14,357 homes are under construction or have consent in the 2019 Housing Land Audit. This is significantly lower than that identified in the Choices document at 20,900 homes. Sites with a total capacity of 15,490 homes are without consent or are considered constrained in the 2019 Housing Land Audit. This is significantly larger than that identified in the Choices document at 9,200 homes. We are aware that as time moves on those sites identified as being without consent or constrained may become effective. However, the Choices document's reliance on 22 sites determined by the Council as constrained within the 2019 Housing Land Audit is concerning. Those 22 constrained sites with a total capacity of 7,468 homes are allocated in the adopted LDP, are Brownfield sites and were identified as constrained during the Examination process. Unfortunately, nothing has changed in the intervening 4 years to enable these sites to become effective. We note that the preferred Option is to seek to identify a further 142 Brownfield sites, amounting to a potential capacity of 16,900 homes, as the

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only locations for future housing development. Similar to the reasons why the current allocated constrained sites cannot become effective (site is in use, intentions of landowner unknown, contaminated land, viability, etc.), this preferred Option has the potential to introduce further constrained sites into the housing land supply. The Choices document acknowledges that these 16,900 homes will be on around 275 hectares of land within the urban area and that much of this land is in other uses at present. The Housing Study confirms that only 11 hectares is vacant land ready for development, 30 hectares has planning consent and the remainder (234 hectares) is currently in use as employment land. Seeking to adopt a development strategy for City Plan 2030 on the basis of a remaining 245 hectares of land, where the intentions of the landowner or may remain in alternative use, presents a significant risk to the Council that it will not be able to meet the housing supply target. We note that of the 142 sites identified, 78 sites are identified by the Housing Study (Figure 2 Assessment of site groupings) and Environmental Report as being unsuitable for development and should not be included in any further assessment for City Plan 2030. These 78 sites have a potential capacity of 8,383 based on a medium low density and include: • Site Ref: 289 Liberton Hospital – capacity 402 homes; • Site Ref: 384 Jane Street – capacity 418 homes; • Site Ref: 372 Inch Nursery – capacity 465 homes; • Site Ref: 259 Astley Ainslie Hospital – capacity 500 homes; and • Site Ref: 367 Redford Barracks – capacity 800 homes. The Housing Study has determined that these sites are unsuitable and should not be included in any further assessment for City Plan 2030. The remaining 64 sites have been identified by the Housing Study (Figure 2 Assessment of site groupings) as being suitable for development and have a potential capacity of 8,333 homes based on a medium low density.

Therefore, the Council's evidence base would suggest that if it considered 8,383 are not suitable for development, then the maximum figure that can be accounted for from brownfield development would be the 8,333 homes from the 64 sites deemed as suitable for development. If City Plan 2030 wishes to deliver a significant proportion of the homes required to meet the remaining housing need and demand of Edinburgh, which is 67,174 homes, Option 1 Delivery by the Council and its partners within the Urban Area will not achieve that outcome. The shortfall arising from this development strategy will be significant as many of these sites will become constrained. There is no certainty that any of the Brownfield sites identified will come forward within the plan period to 2032. The Choices document has not identified a development strategy or a development programme that demonstrates which sites it expects will contribute to the housing supply target. In order to ensure that a five year effective housing land supply is maintained at all times, it is likely that the Council will be required to intervene at the date of adoption of City Plan 2030 in order to secure the land required through Compulsory Purchase. It is clear that this Compulsory Purchase strategy will be complex and time consuming with a significant number of the sites identified in the Housing Study are in existing use. The land value of the existing use may be higher than it would be for residential use. There will also be a requirement to relocate an existing business that is subject to Compulsory Purchase. At this stage, the Council does not know the extent of intervention that will be required, nor the cost implication that this will bear. However, the Council should be in no doubt that this process will cost £100's of millions to implement. A more appropriate Compulsory Purchase strategy would be to examine those existing allocated constrained sites with a capacity of 7,468 homes and seek to enable those to be delivered by 2032. Accordingly, either Option 2 Delivery through market housing by releasing Greenfield or Option 3 A blended approach remain the only appropriate development strategies to adopt. How to deliver our new homes in the most sustainable way We consider that Option 3 A blended approach is the best development strategy to enable the outstanding housing need and demand of 67,174 homes from 2019 to 2032 to be met in the most sustainable way. Any proposed Brownfield or Greenfield allocations for City Plan 2030 should be supported by evidence that identifies that they can contribute to meeting the housing land requirement to 2032 and scale of this likely contribution. Therefore, the housing supply target identified as 52,800 homes should be the minimum all tenure (or overall) housing supply target. This remains 14,374 homes below the unmet housing need and demand from 2019 to 2032 and the Council will need to provide robust evidence why the remaining housing need and demand will not be met in full. Prior to identifying

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the scale of new Brownfield and Greenfield allocations, City Plan 2030 will need to establish the housing land requirement. The adopted LDP identified a 10% generosity margin to be applied to housing supply target and this was endorsed by Scottish Ministers. Given that the Choices document perceives challenges in meeting the housing supply target of 52,800 homes, a further increase in the margin of generosity would serve no clear planning purpose. The housing land requirement should be 58,080 homes. Accordingly, Table 1 Delivery by the Council and its partners should be deleted and any reference removed from City Plan 2030. Table 2 Delivery through market housing can be retained but aligned with the adopted LDP. Adopting evidence set out in the 2019 Housing Land Audit, City Plan 2030 will be required to allocate the following scale of new housing allocations: Housing Supply Target 52,800 Plus 10% Generosity 5,280 Housing Land Requirement 58,080 Effective Housing Land Supply (2019 Housing Land Audit) 22,696 Land to be Allocated in City Plan 2030 35,384 City Plan 2030 will be required to allocate new housing land for around 35,000 homes. Should any constrained sites identified in the 2019 Housing Land Audit become effective, these may assist the delivery of the housing land requirement by 2032. The City Plan 2030 will also be required to take account of any demolitions to housing stock over the period from 2012 to 2032. Approved SES plan SDP identified around 4,000 demolitions over this period. We therefore support Option 3 A Blended Approach to the allocate a minimum 35,000 homes on both Brownfield and Greenfield sites.

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

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

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

Explanation

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

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

Explanation

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

Supporting Info
Email

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

Explanation

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

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

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

Explanation

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

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

Explanation

Customer Ref: 00044

Response Ref: ANON-KU2U-GPGA-6

Supporting Info

Name: Stuart Salter

Email: stuart@geddesconsulting.com

Response Type: Agent / Consultant

On behalf of: Miller Homes and the Wheatlands Farming Partnership

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 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: Response Ref:
Name
Response Type
On behalf of:

Supporting Info
Email

Choice 12 D

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

Short Response

Explanation

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

Explanation We support the principle of 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. However, the Edinburgh Economy Strategy (2018) identifies that the success of this strategy depends on strong leadership and ownership from the Council, Edinburgh Business Forum, and the Edinburgh Partnership. The progress with the Edinburgh Economy Strategy and the Partnership working is not known. Those locations set out in Map 16 Areas of support for inclusive growth, innovation, universities, & culture are already identified in the adopted LDP as Special Economic Areas, namely: • Edinburgh BioQuarter; • Riccarton University Campus and Business Park; • Edinburgh Airport; • Royal Highland Centre; • International Business Gateway; • RBS Headquarters, Gogarburn; and • Leith Docks. Six of these areas are subject to individual policies to ensure development proposals realise their economic potential (Policies Emp 2 to Emp 7). The City Centre is subject to a separate set of proposals that support four major development opportunities which were identified in previous plans or through the planning application process (Proposals CC1 to CC4) as well as Policy Del 2 City Centre. The only area set out in Map 16 that is not yet subject to a specific policy is Cameron Toll. However, Policy Ret 4 Commercial Centres applies to Cameron Toll and an updated policy can be adopted that identifies Cameron Toll as a Special Economic Areas. City Plan 2030 should therefore continue to adopt the existing policy framework set out in the adopted LDP which has regard to Special Economic Areas, updated to add Cameron Toll.

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

Supporting Info
Email

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

Explanation We support the principle of the making 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. However, adopting “an area of search” approach over the identification of sites will not achieve this purpose. There is no detail as what “an area of search” consists of. Therefore, City Plan 2030 needs to allocate land for specific uses in order to understand the transport infrastructure required to implement a strategy for West Edinburgh. Only through the allocation of land for development, can the transport infrastructure requirements be fully assessed and appropriate policy framework to developer contributions be implemented. The Edinburgh Strategic Sustainable Transport Study (Phase 1) identifies two transport corridors in West Edinburgh which transit-based options should be considered further for City Plan 2030. These are: • Newbridge (Corridor 7); and • West of Hermiston (Corridor 8). City Plan 2030 therefore needs to align its transport strategy with the evidence presented in the Edinburgh Strategic Sustainable Transport Study (Phase 1). New land allocations for a variety of uses in locations that support the delivery of these transport corridors should be supported by the Council.

Customer Ref: 00044 Response Ref: ANON-KU2U-GPGA-6
Name: Stuart Salter
Response Type: Agent / Consultant
On behalf of: Miller Homes and the Wheatlands Farming Partnership

Supporting Info:
Email: stuart@geddesconsulting.com

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: No

Explanation

We do not support the principle 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. NPF 3 identifies strategic airport enhancements as a National Development. Norton Park is located within the strategic airport enhancements boundary. NPF 3 clearly states that Norton Park should be used for new National Showground facilities where the gross floor space is or exceeds 10,000 square metres or the development is or exceeds 2 hectares. Other uses such as housing, are not appropriate within the Norton Park site.

Policy Emp 5 Royal Highland Centre of the adopted LDP is clear that the land at Norton Park is safeguarded for the future relocation of the Royal Highland Centre and its development as Scotland's National Showground. Proposals which would prejudice the future development of the Norton Park site for showground purposes will not be permitted. City Plan 2030 should continue to reflect this policy designation. Until such time as the next NPF does or does not identify Norton Park as part of the strategic airport enhancements National Development with other associated uses, City Plan 2030 is required to accord with the requirements of NPF 3. City Plan 2030 should therefore continue to adopt the existing policy framework set out in the adopted LDP which has regard to Norton Park.

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 We do not support the principle to allocate the Airport’s contingency runway, the “crosswinds runway” for the development of alternative uses next to the Edinburgh Gateway interchange. NPF 3 identifies strategic airport enhancements as a National Development. The “crosswinds runway” is located within the strategic airport enhancements boundary. NPF 3 clearly states that development at this location should be for the construction of buildings for business, general industrial or storage and distribution use requiring a near airport location where the gross floor space is or exceeds 10,000 square metres or the development is or exceeds 2 hectares in the area identified for associated business development. Other uses such as housing within the strategic airport enhancements boundary are not appropriate. Policy Emp 4 Edinburgh Airport of the adopted LDP is clear that any proposals relating to the “crosswinds runway” should be for ancillary services and facilities for Edinburgh Airport. These proposals will only be permitted where it can be demonstrated that they have strong and direct functional and locational links with the airport and are compatible with the operational requirements of the airport. City Plan 2030 should continue to reflect this policy designation. Until such time as the next NPF does or does not identify “crosswinds runway” as part of the strategic airport enhancements National Development, City Plan 2030 is required to accord with the requirements of NPF 3. City Plan 2030 should therefore continue to adopt the existing policy framework set out in the adopted LDP which has regard to the “crosswinds runway”.

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 We support the need to protect and enhance the city centre as the regional core of south east Scotland providing shopping, commercial leisure, and entertainment and tourism activities. SESplan SDP identifies that the City Centre as the Regional Town Centre should continue its role as the regional centre for the whole of the SESplan area offering a wide range of higher order retailing. City Plan 2030 should therefore continue to adopt the existing policy framework set out in the adopted LDP which has regard to the Edinburgh City Centre Retail Core.

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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 We support the principle that 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. However, the Commercial Needs Study is yet to be published. This Study will be subject to the allocation of further land for development and this will result in the identification of new local centres.

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 We support the review of 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 and the associated Edinburgh Strategic Sustainable Transport Study (Phase 1).

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

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

Supporting Info
Email

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

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

Customer Ref: 00044

Response Ref: ANON-KU2U-GPGA-6

Supporting Info

Name: Stuart Salter

Email: stuart@geddesconsulting.com

Response Type: Agent / Consultant

On behalf of: Miller Homes and the Wheatlands Farming Partnership

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: Yes

Explanation: We support amending the boundary of the Leith strategic office location to remove areas with residential development consent.

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: No

Explanation: We do not support office development in other accessible locations elsewhere in the urban area.

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:

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

Supporting Info
Email

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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 We support the identification of proposals for new modern business and industrial sites to provide necessary floorspace which are compatible for business/industrial use in accord with the approved development plan.

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 We support the provision of new business space is provided as part of the redevelopment of urban sites and considered in Place Briefs for greenfield sites.

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

Supporting Info
Email

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

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

Explanation