

Customer Ref: 00744 Response Ref: ANON-KU2U-GW6S-E
Name: James Garry
Response Type: Amenity Organisation
On behalf of: Cockburn Association

Supporting Info: Yes
Email: james@cockburnassociation.org.uk

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 believe that if Edinburgh is to remain an attractive and “liveable” city it is essential that suitable and attractive greenspaces, accessible and well-managed open spaces and green-blue infrastructure are provided for its residents. Such spaces and places are an ever more important component of a positive urban land use policy that enhances biodiversity, boosts public health, creates opportunities to enrich and build communities, assists with adaptation to a changing local climate and provides economic development openings. Well-connected and appropriately managed urban green and blue spaces are an essential part of making cities work for residents. This needs to take into account the characteristics of existing places. Provision for the care and maintenance of what already exists is essential and adding to the list of areas to be managed by an overstretched municipal authority might have unforeseen consequences. Therefore, a review on the how and what of section 75 planning agreements is necessary and should consider the possibility of long-term maintenance issues.

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

Supporting Info

Email

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 believe that if Edinburgh is to remain an attractive and “liveable” city it is essential that suitable and attractive greenspaces, accessible and well-managed open spaces and green-blue infrastructure are provided for its residents. Such spaces and places are an ever more important component of a positive urban land use policy that enhances biodiversity, boosts public health, creates opportunities to enrich and build communities, assists with adaptation to a changing local climate and provides economic development openings. Well-connected and appropriately managed urban green and blue spaces are an essential part of making cities work for residents. This needs to take into account the characteristics of existing places. Provision for the care and maintenance of what already exists is essential and adding to the list of areas to be managed by an overstretched municipal authority might have unforeseen consequences. Therefore, a review on the how and what of section 75 planning agreements is necessary and should consider the possibility of long-term maintenance issues.

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

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

Supporting Info

Email

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

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 We believe that if Edinburgh is to remain an attractive and "liveable" city it is essential that suitable and attractive greenspaces, accessible and well-managed open spaces and green-blue infrastructure are provided for its residents. Such spaces and places are an ever more important component of a positive urban land use policy that enhances biodiversity, boosts public health, creates opportunities to enrich and build communities, assists with adaptation to a changing local climate and provides economic development openings. Well-connected and appropriately managed urban green and blue spaces are an essential part of making cities work for residents. This needs to take into account the characteristics of existing places. Provision for the care and maintenance of what already exists is essential and adding to the list of areas to be managed by an overstretched municipal authority might have unforeseen consequences. Therefore, a review on the how and what of section 75 planning agreements is necessary and should consider the possibility of long-term maintenance issues.

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Supporting Info

Email

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

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

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

Supporting Info

Email

Choice 2 B

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

Short Response

Explanation Many parts of Edinburgh are already a 'vertical' city dominated by traditional tenement dwellings. We believe that densification is acceptable over other parts of the city and we support the development of brownfield sites, in preference to using greenbelt/greenfield land, but only if it is accompanied by an expansion of associated high quality, well-managed and accessible urban greenspace provision. Part of this process should encompass a vertical aggregation of uses as well as a horizontal one. A prime feature of historic parts of the city is the mix of ground floor retail/commercial use and residential above. Whilst we accept that the traditional pattern might not apply universally (it will in many circumstances) a greater range of uses might be permitted including home-work facilities, small scale industrial/warehousing/manufacturing, etc. In addition, a re-assessment of current housing quality standards, including space standards, is urgently required to avoid urban residential densification exacerbating the 'cramped' living conditions which are so typical of contemporary housing developments across the city. The number of Edinburgh properties advertised as short term lets has grown tremendously in recent years as have associated concerns that a lack of regulation has exacerbated the housing crisis in the city and threatened the social cohesion of some traditionally residential areas. Achieving a balance in the provision of short-term lets for transient visitors and lets for permanent residents and works is essential.

Choice 2 C

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

Short Response

Explanation

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

Supporting Info

Email

Choice **2 D**

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

Short Response

Explanation

Choice **3 A**

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

Short Response

Explanation Energy use in buildings in Edinburgh accounts for a significant proportion of all citywide carbon emissions and energy use. Therefore, minimising the carbon emissions associated with new buildings and conversions, maximising energy efficiency and using renewable energy presents a substantial opportunity to work towards the city's 2030 carbon reduction target. However, the proposed change needs to clearly refer to new buildings and to recognise that there may be limitations to the extent to which existing historical fabric can accommodate new energy efficiency interventions without detracting from or damaging existing historical or cultural interest. The term "platinum" standard requires further clarification. Embodied energy and carbon, the energy used, and carbon emitted in the past: the 'sunk' embodied energy and carbon associated with existing buildings is important and should be acknowledged. Replacing a building has significant energy, carbon and cost implications. The retention of existing building stock is preferable when energy and carbon performance can be improved to reasonable level, in context and with sensitivity with building conservation and sustainability.

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

Supporting Info

Email

Choice **4 A**

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

Short Response

Explanation We are supportive of Place Plans. However, clarity is required is required on where Place Briefs sit in the hierarchy of strategies, plans and policies. Which have pre-eminence? In addition, for the meaningful and inclusive delivery of Place Plans considerable support will be required at community level if residents are to play an equal part in the preparation of Place Plans alongside stakeholders from professional communities of interest. The Plan identifies several areas for the preparation of place briefs, mainly around the proposed sites for new developments. We recognise the resource and inputs required for the preparation of these plans. We believe, however, there are a number of other communities under pressure, especially in and around the city centre, where place briefs could be a useful tool to engage local communities, manage local pressures and bring an end to excessive commercial development which displaces local populations. We believe that if the preparation of Place Briefs and support for Place Plans are to have any real relevance or utility within communities of place and communities of interest across the city then existing community engagement processes and activities with community-controlled organisations must be significantly strengthened, fully resourced and professionally supported. The challenges to the successful delivery of this policy can be overcome. It may be appropriate to run a number of pilots across the city to establish models of good practice to be rolled out across the city as a whole. The City of Edinburgh Council and other public bodies must find ways to open up consultation processes and activities to a much wider and fully more representative community-based audience both in general terms and, in particular, when preparing Place Briefs or undertaking place planning activities across the city.

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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
We are supportive of Place Plans. However, clarity is required on where Place Briefs sit in the hierarchy of strategies, plans and policies. Which have pre-eminence? In addition, for the meaningful and inclusive delivery of Place Plans considerable support will be required at community level if residents are to play an equal part in the preparation of Place Plans alongside stakeholders from professional communities of interest. The Plan identifies several areas for the preparation of place briefs, mainly around the proposed sites for new developments. We recognise the resource and inputs required for the preparation of these plans. We believe, however, there are a number of other communities under pressure, especially in and around the city centre, where place briefs could be a useful tool to engage local communities, manage local pressures and bring an end to excessive commercial development which displaces local populations. We believe that if the preparation of Place Briefs and support for Place Plans are to have any real relevance or utility within communities of place and communities of interest across the city then existing community engagement processes and activities with community-controlled organisations must be significantly strengthened, fully resourced and professionally supported. The challenges to the successful delivery of this policy can be overcome. It may be appropriate to run a number of pilots across the city to establish models of good practice to be rolled out across the city as a whole. The City of Edinburgh Council and other public bodies must find ways to open up consultation processes and activities to a much wider and fully more representative community-based audience both in general terms and, in particular, when preparing Place Briefs or undertaking place planning activities across the city.

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

Supporting Info

Email

Choice 5 A

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

Short Response

Explanation Successfully delivering community infrastructure needs to be understood within the wider agenda of community wellbeing which can be defined as the “ combination of social, economic, environmental, cultural, and political conditions identified by individuals and their communities as essential for them to flourish and fulfil their potential.If this policy is to be effective, then it must be taken forward on a starting point of a comprehensive evidence base of the actual, rather than perceived, infrastructure capacity across different communities of the city, which must include the key attributes of connectedness, liveability and equity. This will need to be developed in a co-ordinated way with all council stakeholders. And it should certainly start with a comprehensive understanding of the infrastructural needs and expectations of established residential communities across the city and an assessment of if and how these needs and expectations are currently being met to an acceptable standard through existing public sector and other infrastructural providers. This will give an insight into what is important to residents in a local community. From the quality of education, housing affordability, and public transport – to the amount of green space and the number of community centres in an area. Before any further development is directed to existing residential areas there must be community-wide agreement on what needs to be achieved within local communities to meet existing local needs, support existing businesses, promote social cohesion and sustain local accessible greenspace before further development is allocated. When further development is allocated, this must only be done if coupled with a programme of infrastructural expansion and support to address rather than aggravate any existing infrastructure and services deficits that have been identified.

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 5 C

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

Short Response

Explanation

Choice 5 D1

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

Short Response

Explanation

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

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

Supporting Info

Email

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

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 fully support the ambition of the council and its partners to promote the use of public transport and active travel modes. Promoting the use of cycling and walking are particularly important. Not only are they the least carbon intensive transport modes they can contribute to the alleviation of Edinburgh's significant traffic congestion and car parking demand. In addition, both can also contribute towards community health and fitness. However, there is a large segment of the population that does not at present have convenient access to public transport. Greater priority will need to be given to developing routes that serve the whole population, and to the frequency of services throughout the day if public transport is to be an attractive option for people and to enable a significant modal shift. It will require significant policy innovation and expenditure to achieve this,Also, it is important to acknowledge and make provision for those members of the Edinburgh community, both residents and commuters, who for a variety entirely legitimate and entirely unavoidable reasons cannot access public transport and active travel modes. The implementation of this policy must not penalise or discriminate against those community members.

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

Supporting Info

Email

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

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 broadly support the council's ambition to reduce car use within the city. This is entirely consistent with the similar action being taken by other major cities across the world who are seeking to prioritise walkable urban development and public transport over car use. However, we do note that Edinburgh has a very high active travel level already, and we need to recognise that the greater impact comes from travel from outside the built-up city rather than within it. We note that the intention is to address the legitimate needs of car users who require access to a car. This is a positive move.

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

Supporting Info

Email

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 broadly support the council's ambition to reduce car use within the city. The needs of permanent city centre residents must also be protected. The design and management of parking supply could, if it does not address the needs of city centre residents, negatively impacts on the liveability of the city centre for those residents who require regular access to a car and to an affordable car parking space.

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 broadly support the council's ambition to reduce car use within the city. This is entirely consistent with the similar action being taken by other major cities across the world who are seeking to prioritise walkable urban development and public transport over car use. However, we do note that Edinburgh has a very high active travel level already, and we need to recognise that the greater impact comes from travel from outside the built-up city rather than within it.

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

We are concerned that building additional parking, for example additional park and ride spaces on the outskirts of the city or elsewhere in the city region, without managing the existing demand for car based commuting could encourage driving, increase the demand for even more parking in the longer term and do little to reduce the environmental and carbon dis-benefits associated with car based travel in general terms. Where parking space are being lost from the city centre this should, if appropriate, be a local environmental improvement opportunity. The development of, for example, “pocket parks” in such locations may make a positive contribution towards adapting the city centre and other build-up areas of the city to the anticipated challenges of a changing local climate. One of Edinburgh’s most pressing challenges for parking will be to find the right balance between supply and demand.

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

We support the council’s ambition to develop new walking and cycling routes across the city. These will provide many additional benefits for recreational walkers and cyclists alike and for active commuters. However, these benefits will only be achieved if the existing cycle and footpath network and any additional expansion of the network is properly maintained. Expansion of the existing network should only be undertaken if and when all parts of the existing network are acknowledged as being maintained to an acceptable standard by user groups, particularly walkers.

We have concerns about the over-engineering of cycle infrastructure in the city centre, and the consequential impacts on space and amenity that results

Customer Ref:

00744

Response Ref:

ANON-KU2U-GW6S-E

Supporting Info

Yes

Name

James Garry

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Response Type

Amenity Organisation

On behalf of:

Cockburn Association

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

Yes

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

No

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

No

Explanation

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

Supporting Info

Email

Choice 9 A

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

Short Response

Explanation Housing is not only somewhere to live. Affordable, secure and pleasant housing is a fundamental driver of urban regeneration and well-being. The good availability of a range of housing stimulates both physical and economic improvement, and the resulting enhancements in turn fuel new investment and community cohesion. Conversely, a lack of available and affordable houses for non-transient Edinburgh residents and works risks undermining community cohesion and many wider aspects of the civic life of the city. This policy change recognises the fragility of residential communities across the city and the concerns of residents. The largest and best-documented potential social and economic dis-benefit of the recent expansion of short term lets across cities such as Edinburgh is the reduced supply of housing and increased cost of housing as property owners move from serving the needs of established local residents to serving the requirements of transient visitors. Clarity and transparency in the roll out of this policy is essential.

Choice 9 B

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

Short Response

Explanation

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

Supporting Info

Email

Choice **10 A**

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

Short Response

Explanation Off-campus student housing developments has grown considerably in recent years across many Edinburgh neighbourhoods. This has led some communities to express concern over this spread and the potential or actual negative impacts on their neighbourhoods and the local available affordable housing that may, in other circumstances, have been developed on sites given over to student housing. We support the proposal to revise policy on student housing. We believe change is much needed in the light of recent growth in student housing which has had significant impact on the character of some neighbourhoods, and the need to give greater priority to housing for Edinburgh residents and those who wish to live and work permanently in the city. Student housing should be treated as housing for the purposes of social housing provision in the same way that market housing is treated. There are needs to be a policy barrier to large mono-use student housing developments that can sterilise areas in terms of vitality and vibrancy. All student developments should have an element of mixed uses therefore, perhaps mixing with social care provision as we have seen in some Dutch developments. It is unlikely that any single policy intervention will be able to address the many concerns arising from the perceived or actual concentration of students in some established residential communities across Edinburgh. A wide range of stakeholder perspectives is likely to be required to make changes to the existing policy framework successfully. Therefore, it is essential that in developing a revised policy framework, the council works with local communities and a diverse range of relevant stakeholders, which should include the student community, in order to ensure the joined-up delivery of new and workable policy interventions. The integration of student accommodation with other types of residential and residential supported care accommodation should be encouraged, where appropriate.

We believe change is much needed in the light of recent growth in student housing which has had significant impact on the character of some neighbourhoods, and the need to give greater priority to housing for Edinburgh residents and those who wish to live and work permanently in the city.

These proposed changes are to be welcomed but they must be enforced if they are to have any meaningful impact. Exceptions to the revised policy should only be allowed in very exceptional circumstances.

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

Supporting Info

Email

Choice 10 B

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

Short Response

Explanation

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

Choice 11 A

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

Short Response

Explanation

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

Supporting Info

Email

Choice **11 B**

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

Short Response

Explanation Efforts to improve the supply of affordable housing across Edinburgh will need to be informed by new solutions, following international best practice, if a high quality residential environment of affordable housing is to be achieved and sustained in the longer-term. This may mean that it will be necessary to review the established understanding of physical housing form – in terms of size, interior space provision, design, materials used, and reuse of existing buildings – and to consider more community-led solutions if the needs of present and future residents of the city are to be met. This specifically includes the affordable housing requirements generated by increasing life expectancy, immigration and the rise in one-person households. We support the proposal to revise policy on student housing. We believe change is much needed in the light of recent growth in student housing which has had significant impact on the character of some neighbourhoods, and the need to give greater priority to housing for Edinburgh residents and those who wish to live and work permanently in the city. These proposed changes are to be welcomed but they must be enforced if they are to have any meaningful impact. Exceptions to the revised policy should only be allowed in very exceptional circumstances.

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Choice 12 A

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

Short Response: Option 1 (Council/

Explanation

Option 3 may be acceptable if carefully controlled and strictly limited. Option 2 Instead of making this change we could use a market-led greenfield approach. Option 3 Instead we could intervene to deliver significantly more housing (11,000 homes) in the existing urban area, as set out in option 1 and release some land (6,600 homes) from the green belt where it can be supported by the Council, and with viable new infrastructure required to support it. Additional Comment: The release of further greenbelt land for housing development should be resisted at this time. Considerable areas of formerly greenbelt land already has planning permission in place for housing development. In some, perhaps many, instances this approved development has not been progress for many years and shows no indication of being progressed in the near term. Such "ghost housing" should be developed before any substantial further releases of greenbelt land for housing development are made. In addition, before new homes are developed, empty or abandoned existing residential properties across the city must be brought back into residential use. The potential of these unused properties to address current and future housing requirements needs to be fully assessed. Urban brownfield sites are often occupied by smaller-scale light industrial and retail uses. There can have significant utility to the communities within which they are situated, and they can add valuable character to local streetscapes. The residential development of urban brownfield sites should, whenever possible, seek to conserve existing industrial and retail functions.

It is also of concern, that the number of homes that have not been built in the city of Edinburgh area despite receiving planning permission appears to be rising, potentially meaning that sites for thousands of new properties are being left undeveloped. Research is required to understand why such sites are not being developed across Edinburgh. Following on from this consideration should be given to a "use it or lose it" approach by the City of Edinburgh Council to prevent developers and landowners leaving sites undeveloped before further permissions for large scale housing developments are awarded.

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **12 B4**

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

Short Response

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

Choice **12 C**

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

Short Response

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 12 C

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

Short Response

Explanation

Choice 12 C

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

Short Response

Explanation

Choice 12 D

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

Short Response

Explanation

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

Supporting Info

Email

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 broadly support the changes proposed. Edinburgh is a vibrant city with a diversified economic base, and world-leading educational institutions, which is attractive to many people as a place to live and visit. The plan needs to support economic development across a range of sectors while managing the pressures that can arise from the number of tourist visitors and popular cultural events. Economic policies should support quality of life in the city, and in particular the quality of life of residents. This should mean maintaining Edinburgh as an attractive location to visit and for residents. At the same time, we support policies to encourage innovation and entrepreneurship, and build on the high levels of skills of the city's workforce and the success of its educational institutions. We believe the plan should commit itself to policies which foster a high value, high pay economy, and create a dynamic and economically successful city. This means supporting a balance of sectors and opportunities and avoiding undue dependence on sectors such as tourism which may create excessive pressures on the social fabric and infrastructure of the city. One of the factors that will influence the inclusive growth of Edinburgh will be technological innovation. It is difficult to predict how technology, and particularly emerging technologies, will change city life. Certainly, technology will be increasingly used in the development and running of Edinburgh in the future. Smart planning may harness solar energy for use in housing estates smart mobility technology may alleviate traffic congestion. City Plan 2030 must have a range of policies in place which are sufficiently agile to enable a timely citywide response to the challenges and opportunities of a dynamic technological culture. The use of environmental technologies which can cool buildings more efficiently or run vehicles that are less polluting will also lead to better future cities. Installing sensors in the homes of ageing seniors living alone can connect them to the community and summon help when they are unwell or hurt.

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 seriously question the wisdom and desirability of further urbanising the area surrounding Edinburgh Airport. The western side of Edinburgh is already heavily developed, and heavily congested, with more housing and associated infrastructure being delivered in the near term. The comparatively undeveloped surroundings of Edinburgh airport provide a contrast to the expanding urban sprawl and an appropriate ‘arrival’ rural setting to the airport for Scotland’s capital city.

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

Explanation We seriously question the wisdom and desirability of further urbanising the area surrounding Edinburgh Airport. The western side of Edinburgh is already heavily developed, and heavily congested, with more housing and associated infrastructure being delivered in the near term. The comparatively undeveloped surroundings of Edinburgh airport provide a contrast to the expanding urban sprawl and an appropriate ‘arrival’ rural setting to the airport for Scotland’s capital city.

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 seriously question the wisdom and desirability of further urbanising the area surrounding Edinburgh Airport. The western side of Edinburgh is already heavily developed, and heavily congested, with more housing and associated infrastructure being delivered in the near term. The comparatively undeveloped surroundings of Edinburgh airport provide a contrast to the expanding urban sprawl and an appropriate 'arrival' rural setting to the airport for Scotland's capital city.

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 This policy change is timely. Some of Edinburgh's traditional shopping centres or "high streets" are in a relatively healthy condition. But many show the tell-tale signs of the ongoing decline which has affected many high street and local shops across the UK in recent years. There is no room for complacency. Neither the local shopping areas of Edinburgh nor the city centre are immune from changing shopping habits, the growth of internet shopping and the ever-expanding offering of out-of-town shopping in the Edinburgh city region. Some traditional shopping streets, such as Princes Street, are likely to change their character quite radically in short term due to new developments such as the St James Centre. And there is a gradual loss of character in many local shopping streets as major chains and charity shops become more dominant. At the same time, in some of the more affluent parts of the city traditional shopping and artisanal retail is holding its own or reviving

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 This policy change is timely. Some of Edinburgh’s traditional shopping centres or “high streets” are in a relatively heathy condition. But many show the tell-tale signs of the ongoing decline which has affected many high street and local shops across the UK in recent years. There is no room for complacency. Neither the local shopping areas of Edinburgh nor the city centre are immune from changing shopping habits, the growth of internet shopping and the ever-expanding offering of out-of-town shopping in the Edinburgh city region. Some traditional shopping streets, such as Princes Street, are likely to change their character quite radically in short term due to new developments such as the St James Centre. And there is a gradually loss of character in in many local shopping streets as major chains and charity shops become more dominant. At the same time, in some of the more affluent parts of the city traditional shopping and artisanal retail is holding its own or reviving

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 This policy change is timely. Some of Edinburgh’s traditional shopping centres or “high streets” are in a relatively heathy condition. But many show the tell-tale signs of the ongoing decline which has affected many high street and local shops across the UK in recent years. There is no room for complacency. Neither the local shopping areas of Edinburgh nor the city centre are immune from changing shopping habits, the growth of internet shopping and the ever-expanding offering of out-of-town shopping in the Edinburgh city region. Some traditional shopping streets, such as Princes Street, are likely to change their character quite radically in short term due to new developments such as the St James Centre. And there is a gradually loss of character in in many local shopping streets as major chains and charity shops become more dominant. At the same time, in some of the more affluent parts of the city traditional shopping and artisanal retail is holding its own or reviving

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 This policy change is timely. Some of Edinburgh’s traditional shopping centres or “high streets” are in a relatively healthy condition. But many show the tell-tale signs of the ongoing decline which has affected many high street and local shops across the UK in recent years. There is no room for complacency. Neither the local shopping areas of Edinburgh nor the city centre are immune from changing shopping habits, the growth of internet shopping and the ever-expanding offering of out-of-town shopping in the Edinburgh city region. Some traditional shopping streets, such as Princes Street, are likely to change their character quite radically in short term due to new developments such as the St James Centre. And there is a gradual loss of character in many local shopping streets as major chains and charity shops become more dominant. At the same time, in some of the more affluent parts of the city traditional shopping and artisanal retail is holding its own or reviving

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

Supporting Info

Email

Choice 15 G

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

Short Response

Explanation This policy change is timely. Some of Edinburgh's traditional shopping centres or "high streets" are in a relatively healthy condition. But many show the tell-tale signs of the ongoing decline which has affected many high street and local shops across the UK in recent years. There is no room for complacency. Neither the local shopping areas of Edinburgh nor the city centre are immune from changing shopping habits, the growth of internet shopping and the ever-expanding offering of out-of-town shopping in the Edinburgh city region. Some traditional shopping streets, such as Princes Street, are likely to change their character quite radically in short term due to new developments such as the St James Centre. And there is a gradually loss of character in in many local shopping streets as major chains and charity shops become more dominant. At the same time, in some of the more affluent parts of the city traditional shopping and artisanal retail is holding its own or reviving

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

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

Choice 16 A4

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 A5

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

Short Response

Explanation

Choice 16 A5

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

Short Response

Explanation

Choice 16 B

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

Short Response

Explanation

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

Supporting Info

Email

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

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

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

Supporting Info

Email

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

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

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

Supporting Info

Email

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

Choices for City Plan 2030 – Cockburn View

General Comment

The Cockburn is broadly supportive of the draft policies being proposed in the 'Choices for City Plan 2030' document. However, it appears to us that many of the new policies, as proposed, are already within the scope of the city's existing planning policy and have been the subject of discussion within the land use planning community for many years.

In addition, although many of the new policies being proposed are commendable in themselves, we have significant reservation regarding their deliverability in any meaningful or significant way. In this context, it would be helpful and appropriate for the City of Edinburgh Council to provide an assessment of the effectiveness of the policies contained within the previous local plan. Which policies were effective? Which were not effective? What was this so? How is this directly addressed by the policy framework now being proposed?

We have reservations about the robustness of the proposals over the extended plan period of up to 10 years. Whilst this is an outcome of the recent legislative changes, the rapid change of modern society from technological innovations to amending trading patterns suggests that many of the assumptions built into the plan and related plans (such as the City Mobility Plan) will be unfounded in years to come. For example, the clinical changes to healthcare provision which has driven the consolidation of infrastructure onto major new "campuses" in the past, might revert to the need for more locally-based provision. This would require a potentially significant amendment to land-use allocations in existing urban areas to provide sites.

Much of the Plan's quantitative growth projections are based on projections and extrapolations of data. It is regrettable that the timing of this document hasn't allowed for the 2021 Census data to be used. The implications of Brexit and outward migration of seasonal workers could have a significant impact on housing projections as could any variance to the Higher Education and the need to provide for further student accommodation. We would therefore advocate that, as a Choice for the City, the Council indicates that it will review the plan in the next few years if emerging data from the census challenges the assumptions built into this plan.

Finally, there is an inbuilt inconsistency in a local development plan predicated on, to a greater or lesser degree, quantitative growth projections and the declared Climate Emergency and the stated political ambition to be carbon neutral by 2030. A "No Growth" option should be included in this Choices Report to enable a coherent and structured discussion on the major challenges facing the City. Pretending that this dichotomy doesn't exist is not a way forward.

Specific Comments on Consultation Questions

Choice 1 - Making Edinburgh a sustainable, active and connected city

We support the following proposed changes:

- A We want to create a new policy which will help connect our places, parks and greenspaces together as part of a multi-functional, local, city-wide, regional, and national green network
- B We want all development (including change of use) to include green and blue infrastructure. Where appropriate this should include 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
- E We want to introduce a new 'extra-large green space standard' which recognises the need for new communities to have access to green spaces more than 5 hectares, as well as smaller greenspaces. A 5-hectare green space is the equivalent of The Meadows or Saughton Park. At present our policies require new development areas to provide a park of 2 hectares. We want to increase this requirement.

Additional Comment:

We believe that if Edinburgh is to remain an attractive and "liveable" city it is essential that suitable and attractive greenspaces, accessible and well-managed open spaces and green-blue infrastructure are provided for its residents. Such spaces and places are an ever more important component of a positive urban land use policy that enhances biodiversity, boosts public health, creates opportunities to enrich and build communities, assists with adaptation to a changing local climate and provides economic development openings. Well-connected and appropriately managed urban green and blue spaces are an essential part of making cities work for residents.

This needs to take into account the characteristics of existing places. Provision for the care and maintenance of what already exists is essential and adding to the list of areas to be managed by an overstretched municipal authority might have unforeseen consequences. Therefore, a review on the how and what of section 75 planning agreements is necessary and should consider the possibility of long-term maintenance issues.

Choice 2 - Improving the quality and density of development

We support the following proposed changes:

- B We want to revise our policies on density. This is to ensure that we make best use of the limited space in our city and that sites are not under-developed.
- Across the city, on both urban area and greenfield sites, housing development must achieve a minimum of 65 dwellings per hectare.
 - Where identified in the plan, higher density housing development with a minimum of 100 dwellings per hectare will be required.
 - A vertical mix of uses to support the efficient use of land.

Additional Comment:

Many parts of Edinburgh are already a 'vertical' city dominated by traditional tenement dwellings. We believe that densification is acceptable over other parts of the city and we support the development of brownfield sites, in preference to using greenbelt/greenfield land, but only if it is accompanied by an expansion of associated high quality, well-managed and accessible urban greenspace provision. Part of this process should encompass a vertical aggregation of uses as well as a horizontal one. A prime feature of historic parts of the city is the mix of ground floor retail/commercial use and residential above. Whilst we accept that the traditional pattern might not apply universally (it will in many circumstances) a greater range of uses might be permitted including home-work facilities, small scale industrial/warehousing/manufacturing, etc.

In addition, a re-assessment of current housing quality standards, including space standards, is urgently required to avoid urban residential densification exacerbating the 'cramped' living conditions which are so typical of contemporary housing developments across the city.

The number of Edinburgh properties advertised as short term lets has grown tremendously in recent years as have associated concerns that a lack of regulation has exacerbated the housing crisis in the city and threatened the social cohesion of some traditionally residential areas. Achieving a balance in the provision of short-term lets for transient visitors and lets for permanent residents and works is essential.

Choice 3 - Delivering carbon neutral buildings

We do not support the following proposed change:

- A We want to require all buildings and conversions to meet the zero carbon / platinum standards as set out in the current Scottish Building Regulations. We will continue to require at least 50% of the carbon reduction target to be met through low and zero-carbon generating technologies

Additional Comment:

Energy use in buildings in Edinburgh accounts for a significant proportion of all citywide carbon emissions and energy use. Therefore, minimising the carbon emissions associated with new buildings and conversions, maximising energy efficiency and using renewable energy presents a substantial opportunity to work towards the city's 2030 carbon reduction target.

However, the proposed change needs to clearly refer to new buildings and to recognise that there may be limitations to the extent to which existing historical fabric can accommodate new energy efficiency interventions without detracting from or damaging existing historical or cultural interest. The term "platinum" standard requires further clarification.

Embodied energy and carbon, the energy used, and carbon emitted in the past: the 'sunk' embodied energy and carbon associated with existing buildings is important and should be acknowledged. Replacing a building has significant energy, carbon and cost implications. The retention of existing building stock is preferable when energy and carbon performance can be improved to reasonable level, in context and with sensitivity with building conservation and sustainability.

Choice 4 - Creating Place Briefs and supporting the use of Local Place Plans in our communities

We support the following proposed changes:

- 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, open space, biodiversity net gain and community infrastructure development should deliver

Additional Comment:

We are supportive of Place Plans. However, clarity is required is required on where Place Briefs sit in the hierarchy of strategies, plans and policies. Which have pre-eminence? In addition, for the meaningful and inclusive delivery of Place Plans considerable support will be required at community level if residents are to play an

equal part in the preparation of Place Plans alongside stakeholders from professional communities of interest.

The Plan identifies several areas for the preparation of place briefs, mainly around the proposed sites for new developments. We recognise the resource and inputs required for the preparation of these plans. We believe, however, there are a number of other communities under pressure, especially in and around the city centre, where place briefs could be a useful tool to engage local communities, manage local pressures and bring an end to excessive commercial development which displaces local populations.

We believe that if the preparation of Place Briefs and support for Place Plans are to have any real relevance or utility within communities of place and communities of interest across the city then existing community engagement processes and activities with community-controlled organisations must be significantly strengthened, fully resourced and professionally supported. The challenges to the successful delivery of this policy can be overcome. It may be appropriate to run a number of pilots across the city to establish models of good practice to be rolled out across the city as a whole.

The City of Edinburgh Council and other public bodies must find ways to open up consultation processes and activities to a much wider and fully more representative community-based audience both in general terms and, in particular, when preparing Place Briefs or undertaking place planning activities across the city.

Choice 5 - Delivering community infrastructure

We support the following proposed changes:

- 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 (deliverable within the plan period), encouraging improvements and investment in the services on offer.

Additional Comment:

Successfully delivering community infrastructure needs to be understood within the wider agenda of community wellbeing which can be defined as the “ combination of social, economic, environmental, cultural, and political conditions identified by individuals and their communities as essential for them to flourish and fulfil their potential.

If this policy is to be effective, then it must be taken forward on a starting point of a comprehensive evidence base of the actual, rather than perceived, infrastructure capacity across different communities of the city, which must include the key attributes of connectedness, liveability and equity. This will need to be developed in a co-ordinated way with all council stakeholders. And it should certainly start with a

comprehensive understanding of the infrastructural needs and expectations of established residential communities across the city and an assessment of if and how these needs and expectations are currently being met to an acceptable standard through existing public sector and other infrastructural providers. This will give an insight into what is important to residents in a local community. From the quality of education, housing affordability, and public transport – to the amount of green space and the number of community centres in an area.

Before any further development is directed to existing residential areas there must be community-wide agreement on what needs to be achieved within local communities to meet existing local needs, support existing businesses, promote social cohesion and sustain local accessible greenspace before further development is allocated. When further development is allocated, this must only be done if coupled with a programme of infrastructural expansion and support to address rather than aggravate any existing infrastructure and services deficits that have been identified.

Choice 6 - Creating places for people, not cars

We support the following proposed changes:

- 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.
- 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.

Additional Comment:

We fully support the ambition of the council and its partners to promote the use of public transport and active travel modes. Promoting the use of cycling and walking are particularly important. Not only are they the least carbon intensive transport modes they can contribute to the alleviation of Edinburgh's significant traffic congestion and car parking demand. In addition, both can also contribute towards community health and fitness.

However, there is a large segment of the population that does not at present have convenient access to public transport. Greater priority will need to be given to developing routes that serve the whole population, and to the frequency of services throughout the day if public transport is to be an attractive option for people and to enable a significant modal shift. It will require significant policy innovation and expenditure to achieve this,

Also, it is important to acknowledge and make provision for those members of the Edinburgh community, both residents and commuters, who for a variety entirely

legitimate and entirely unavoidable reasons cannot access public transport and active travel modes. The implementation of this policy must not penalise or discriminate against those community members.

Choice 7 - Supporting the reduction in car use in Edinburgh

We support the following proposed changes:

- 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.
- 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.
- 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.
- D We want to support the city's park and ride infrastructure by safeguarding sites for new park and ride at Gilmerton Road and Lasswade Road and extensions to the current sites at Hermiston and Newcraighall. There is also the potential to safeguard an extension to the park and ride at Ingliston as part of the International Business Gateway masterplan. Policies on Park and Rides will be amended to reference these sites and any other sites that are identified in the City Mobility Plan or its action plan.

Additional Comment:

We broadly support the council's ambition to reduce car use within the city. This is entirely consistent with the similar action being taken by other major cities across the world who are seeking to prioritise walkable urban development and public transport over car use. However, we do note that Edinburgh has a very high active travel level already, and we need to recognise that the greater impact comes from travel from outside the built-up city rather than within it.

We note that the intention is to address the legitimate needs of car users who require access to a car. This is a positive move. In addition, the needs of permanent city centre residents must also be protected. The design and management of parking supply could, if it does not address the needs of city centre residents, negatively impacts on the liveability of the city centre for those residents who require regular access to a car and to an affordable car parking space.

We are concerned that building additional parking, for example additional park and ride spaces on the outskirts of the city or elsewhere in the city region, without

managing the existing demand for car based commuting could encourage driving, increase the demand for even more parking in the longer term and do little to reduce the environmental and carbon dis-benefits associated with car based travel in general terms.

Where parking space are being lost from the city centre this should, if appropriate, be a local environmental improvement opportunity. The development of, for example, “pocket parks” in such locations may make a positive contribution towards adapting the city centre and other build-up areas of the city to the anticipated challenges of a changing local climate.

One of Edinburgh’s most pressing challenges for parking will be to find the right balance between supply and demand.

Choice 8 - Delivering new walking and cycle routes

We support the following proposed changes:

- A We want to update our policy on the Cycle and Footpath Network to provide criteria for identifying new routes.
- B As part of the City Centre Transformation and other Council and partner projects we want to add strategic routes to our network.

Additional Comment:

We support the council’s ambition to develop new walking and cycling routes across the city. These will provide many additional benefits for recreational walkers and cyclists alike and for active commuters.

However, these benefits will only be achieved if the existing cycle and footpath network and any additional expansion of the network is properly maintained. Expansion of the existing network should only be undertaken if and when all parts of the existing network are acknowledged as being maintained to an acceptable standard by user groups, particularly walkers.

We have concerns about the over-engineering of cycle infrastructure in the city centre, and the consequential impacts on space and amenity that results.

Choice 9 - Protecting against the loss of Edinburgh’s homes to other uses

We support the following proposed change:

- 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.

Additional Comment:

Housing is not only somewhere to live. Affordable, secure and pleasant housing is a fundamental driver of urban regeneration and well-being. The good availability of a range of housing stimulates both physical and economic improvement, and the resulting enhancements in turn fuel new investment and community cohesion. Conversely, a lack of available and affordable houses for non-transient Edinburgh residents and works risks undermining community cohesion and many wider aspects of the civic life of the city.

This policy change recognises the fragility of residential communities across the city and the concerns of residents. The largest and best-documented potential social and economic dis-benefit of the recent expansion of short term lets across cities such as Edinburgh is the reduced supply of housing and increased cost of housing as property owners move from serving the needs of established local residents to serving the requirements of transient visitors. Clarity and transparency in the roll out of this policy is essential.

Choice 10 - Creating sustainable communities

We support the following proposed changes:

- 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.
- 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.

Additional Comment:

Off-campus student housing developments has grown considerably in recent years across many Edinburgh neighbourhoods. This has led some communities to express concern over this spread and the potential or actual negative impacts on their neighbourhoods and the local available affordable housing that may, in other circumstances, have been developed on sites given over to student housing.

We support the proposal to revise policy on student housing. We believe change is much needed in the light of recent growth in student housing which has had significant impact on the character of some neighbourhoods, and the need to give greater priority to housing for Edinburgh residents and those who wish to live and work permanently in the city.

Student housing should be treated as housing for the purposes of social housing provision in the same way that market housing is treated. There are needs to be a policy barrier to large mono-use student housing developments that can sterilise areas in terms of vitality and vibrancy. All student developments should have an element of mixed uses therefore, perhaps mixing with social care provision as we have seen in some Dutch developments.

It is unlikely that any single policy intervention will be able to address the many concerns arising from the perceived or actual concentration of students in some established residential communities across Edinburgh. A wide range of stakeholder perspectives is likely to be required to make changes to the existing policy framework successfully. Therefore, it is essential that in developing a revised policy framework, the council works with local communities and a diverse range of relevant stakeholders, which should include the student community, in order to ensure the joined-up delivery of new and workable policy interventions.

The integration of student accommodation with other types of residential and residential supported care accommodation should be encouraged, where appropriate.

Choice 11 - Delivering more affordable homes

We support the following proposed changes:

- A We want to amend our policy to increase the provision of affordable housing requirement from 25% to 35%. All development, including conversions, which consist of 12 residential units or more must include provision for affordable housing amounting to 35% of the total units.
- 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.

Additional Comment:

Efforts to improve the supply of affordable housing across Edinburgh will need to be informed by new solutions, following international best practice, if a high quality residential environment of affordable housing is to be achieved and sustained in the longer-term. This may mean that it will be necessary to review the established understanding of physical housing form – in terms of size, interior space provision, design, materials used, and reuse of existing buildings – and to consider more community-led solutions if the needs of present and future residents of the city are to be met. This specifically includes the affordable housing requirements generated by increasing life expectancy, immigration and the rise in one-person households.

We support the proposal to revise policy on student housing. We believe change is much needed in the light of recent growth in student housing which has had

significant impact on the character of some neighbourhoods, and the need to give greater priority to housing for Edinburgh residents and those who wish to live and work permanently in the city.

These proposed changes are to be welcomed but they must be enforced if they are to have any meaningful impact. Exceptions to the revised policy should only be allowed in very exceptional circumstances. Indeed, it may be that provision for affordable housing amounting to 50% of the total units would be a higher ambition appropriate to the city of Edinburgh.

It is also of concern, that the number of homes that have not been built in the city of Edinburgh area despite receiving planning permission appears to be rising, potentially meaning that sites for thousands of new properties are being left undeveloped. Research is required to understand why such sites are not being developed across Edinburgh. Following on from this consideration should be given to a “use it or lose it” approach by the City of Edinburgh Council to prevent developers and landowners leaving sites undeveloped before further permissions for large scale housing developments are awarded.

Choice 12 - Building our new homes and infrastructure

We support the following proposed changes:

Option 1 We want our new homes to be delivered by the Council and its partners within the Urban Area.

Option 3 *may be acceptable if carefully controlled and strictly limited.*

Option 2 Instead of making this change we could use a market-led greenfield approach

Option 3 Instead we could intervene to deliver significantly more housing (11,000 homes) in the existing urban area, as set out in option 1 and release some land (6,600 homes) from the green belt where it can be supported by the Council, and with viable new infrastructure required to support it.

Additional Comment:

The release of further greenbelt land for housing development should be resisted at this time. Considerable areas of formerly greenbelt land already has planning permission in place for housing development. In some, perhaps many, instances this approved development has not been progress for many years and shows no indication of being progressed in the near term. Such “ghost housing” should be developed before any substantial further releases of greenbelt land for housing development are made.

In addition, before new homes are developed, empty or abandoned existing residential properties across the city must be brought back into residential use. The

potential of these unused properties to address current and future housing requirements needs to be fully assessed.

Urban brownfield site are often occupied by smaller-scale light industrial and retail uses. They can have significant utility to the communities within which they are situated, and they can add valuable character to local streetscapes. The residential development of urban brownfield site should, whenever possible, seek to conserve existing industrial and retail functions.

Choice 13 - Supporting inclusive growth, innovation, universities, & culture

We *broadly* support the changes proposed.

Additional Comment:

Edinburgh is a vibrant city with a diversified economic base, and world-leading educational institutions, which is attractive to many people as a place to live and visit. The plan needs to support economic development across a range of sectors while managing the pressures that can arise from the number of tourist visitors and popular cultural events.

Economic policies should support quality of life in the city, and in particular the quality of life of residents. This should mean maintaining Edinburgh as an attractive location to visit and for residents.

At the same time, we support policies to encourage innovation and entrepreneurship, and build on the high levels of skills of the city's workforce and the success of its educational institutions. We believe the plan should commit itself to policies which foster a high value, high pay economy, and create a dynamic and economically successful city.

This means supporting a balance of sectors and opportunities and avoiding undue dependence on sectors such as tourism which may create excessive pressures on the social fabric and infrastructure of the city.

One of the factors that will influence the inclusive growth of Edinburgh will be technological innovation. It is difficult to predict how technology, and particularly emerging technologies, will change city life. Certainly, technology will be increasingly used in the development and running of Edinburgh in the future. Smart planning may harness solar energy for use in housing estates smart mobility technology may alleviate traffic congestion. City Plan 2030 must have a range of policies in place which are sufficiently agile to enable a timely citywide response to the challenges and opportunities of a dynamic technological culture.

The use of environmental technologies which can cool buildings more efficiently or run vehicles that are less polluting will also lead to better future cities. Installing sensors in the homes of ageing seniors living alone can connect them to the community and summon help when they are unwell or hurt.

Choice 14 - Delivering West Edinburgh

We do not support the changes proposed.

Additional Comment:

We seriously question the wisdom and desirability of further urbanising the area surrounding Edinburgh Airport. The western side of Edinburgh is already heavily developed, and heavily congested, with more housing and associated infrastructure being delivered in the near term. The comparatively undeveloped surroundings of Edinburgh airport provide a contrast to the expanding urban sprawl and an appropriate 'arrival' rural setting to the airport for Scotland's capital city.

Choice 15 - Protecting our city centre, town and local centres

We support the following changes:

- 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.
- B We will also support and strengthen our other town and local centres (including any new local centres) by ensuring that new shopping and leisure development is directed to them and only permitted where 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.
- 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.
- D We also want to continue to prepare and update supplementary guidance tailored to the city centre and individual town centres. The use of supplementary guidance allows us to adapt to changing retail patterns and trends over the period of the plan. It also helps us ensure an appropriate balance of uses within our centres to maintain their vitality, viability and deliver good placemaking.
- E We also want to support new hotel provision in local, town, commercial centres and other locations with good public transport access throughout Edinburgh in response to evidence of strong growing visitor demand and reflecting limited availability of sites in the city centre.

Additional Comment:

This policy change is timely. Some of Edinburgh's traditional shopping centres or "high streets" are in a relatively healthy condition. But many show the tell-tale signs of the ongoing decline which has affected many high street and local shops across the UK in recent years. There is no room for complacency. Neither the local shopping areas of Edinburgh nor the city centre are immune from changing shopping habits, the growth of internet shopping and the ever-expanding offering of out-of-town shopping in the Edinburgh city region.

Some traditional shopping streets, such as Princes Street, are likely to change their character quite radically in short term due to new developments such as the St James Centre. And there is a gradual loss of character in many local shopping streets as major chains and charity shops become more dominant.

At the same time, in some of the more affluent parts of the city traditional shopping and artisanal retail is holding its own or reviving.

Choice 16 (part 1) - Delivering office floorspace

We support the following proposed changes:

- A 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.
 - Support office development at commercial centres as these also provide accessible locations.
 - Strengthen the requirement within the city centre to provide significant office floorspace within major mixed-use developments.
 - Amend the boundary of the Leith strategic office location to remove areas with residential development consent.
 - Continue to support office development in other accessible locations elsewhere in the urban area.
- B We want to identify sites and locations within Edinburgh with potential for office development.
- 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 are limited sites for future development and demand is likely to continue. meeting the needs of the mid-market.

Choice 16 (part 2) - Delivering Business and Industrial Space

We support the following proposed changes:

- A We want to identify proposals for new modern business and industrial sites to provide necessary floorspace.
- B We also want to ensure new business space is provided as part of the redevelopment of urban sites and considered in Place Briefs for greenfield site
- C We also want to continue to protect industrial estates that are designated under our current policy on Employment Sites and Premises (Emp 8).
- D We also want to introduce a policy that provides criteria for locations that we would support city-wide and neighbourhood goods distribution hubs.

End