

Response ID ANON-KU2U-GTB8-V

Submitted to **Choices for City Plan 2030**

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Your information and data

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4 I am responding as

Amenity Organisation

5 IF you are responding on behalf of an organisation or an other individual, what is their name?

Agent on behalf of:

The Association for the Protection of Rural Scotland (APRS)

6 I agree to my response being published to this consultation.

Yes

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

1A 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?

Yes

Explain why:

We support Choice 1 and the following proposed changes: A, B, C, D (part), E, F, H. The Green Belt is a crucial element of the green network and is not confined to 'corridors' (C) e.g. it can surround and penetrate settlements. Green Belts have multifunctional values that support all the Scottish Government policies for the environment and sustainability, including climate change. But there is widespread concern about the erosion of Green Belts which require stronger protection in policies (Poll: 70+% say Green Belts should have stronger protection against building development). Hence, H is welcomed, but needs significant strengthening in relation to Green Belts.

Covid 19 precautionary requirements should not affect these key principles. Indeed the experience of the pandemic requirements for people living in small apartment is the need for more nearby and accessible green spaces .

1B 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?

Yes

Explain why:

Same comments for Q1 A. apply.

1C 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

Explain why:

Same comments for Q1 A. apply. Sensitively designed afforestation that blends with the landscape of water catchment areas could aid flood control of rivers, as well as the sequestration of CO2. This needs to be accompanied by preventing development on flood plains, revised design of buildings to minimise flood damage on areas at risk of flood and timely warnings/advice about impending flooding events. In addition, resources are also required for both inland and coastal

flood defences - planning to undertake this work is urgent, given that climate change effects seem to be occurring more frequently.

1D 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

Explain why:

Same comments for Q1 A. apply. Care is needed in the assessment of D for development e.g. a strong direction that 'brownfield sites' must be developed before 'green spaces', is important, but 'poor quality/underused open space' needs more precise definition. The environmental quality of such areas might be improved to contribute to the health and well being of communities rather than used for building development. A further option, in appropriate circumstances, could be to specify an industrial/commercial use to provide employment opportunities close to existing communities, thereby reducing commuting/polluting journeys. It is important that an up to date register of 'brownfield sites' is created and maintained.

1E 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

Explain why:

Same comments for Q1 A. apply. We welcome this approach, which should be included within new guidance that reflects the former countryside heritage/landscape character of green spaces e.g. larger open spaces, maintain views/vistas to surrounding countryside, substantial tree/woodland planting, path systems suitable for a variety of users, naturalistic housing layouts, etc

1F 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

Explain why:

Same comments for Q1 A. apply. In principle we agree with this proposal e.g. the need to encourage home food production to reduce the UK's large reliance upon high food imports that could be adversely affected by climate change. This problem is exacerbated at a much larger scale by allowing development on prime farmland, which needs additional/stronger policies for its protection.

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1G We want to identify space for additional cemetery provision, including the potential for green and woodland burials. Do you agree with this?

Not Answered

Explain why:

We understand there is limited space for burials in the Edinburgh area. However, we are unable to have a view about 'green and woodland' burials until the site location specification, design and infrastructure/drainage requirements associated with these burials is fully specified e.g. roads, buildings, car parks, fences etc could urbanise green spaces and become visually intrusive.

The clarification of these specifications has now become urgent, as a result of increased demand for burials due to Covid 19.

1H 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

Explain why:

Same comments for Q1 A. apply. We believe these to be particularly important (stronger Green Belt protection) in relation to proposal s1E/H. An up to date register of the condition of the City's green spaces should be maintained. In particular, Green Belt designations should have significant permanence with boundaries only reviewed/changed every 10 years e.g. at LDP revisions.

Choice 2 - Improving the quality and density of development

2A 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

Explain why:

We support this proposal. It would be helpful to have guidance on the various issues that require to be demonstrated and the levels of attainment required - this should now include any Covid 19 effects e.g. paths may need to be widened to facilitate 'social distancing', especially on shared routes by multi users. It will also be important for Local Authorities (LAs) to monitor and, if necessary, enforce the 'climate change plan'. This has particular relevance to development at

Edinburgh Airport, in view of concerns about adverse impacts of aero engine emissions.

NDA for housing are forecasts and their accuracy is questionable. Added to this uncertainty are the possible effects of Covid 19 on future housing demand and targets. This unforeseen issue needs to be carefully assessed.

2B 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

Explain why:

Agree in principle, but the criteria for this proposal must be carefully specified. An increase in density must not undermine sustainability/environmental/health/access proposals. In this respect, a density of 65 dwellings/ha seems high for greenfield sites and should be carefully tested, using photomontage, etc techniques

Within settlements an increase in vertical density rather than horizontal could safeguard important environmental/open space proposals. An increase in building height must also reflect adjoining urban characteristics e.g. up to 5 storeys in areas with prominent urban elements. (NB: but also have regard to Edinburgh's skyline policies)

This approach could also have the potential to lessen the pressure to build on undeveloped green spaces.

2C 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

Explain why:

We support proposal 2C in principle. Our comments at Choice 1A also apply e.g. on greenfield sites, naturalistic/informal design layouts and shapes for street patterns and access connections should be adopted/incorporated in revised Street Guidance.

2D 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

Explain why:

Improved open space and public realm quality could contribute to the health and well being of students as well as enhancing the quality of the surrounding area.

Choice 3 - Delivering carbon neutral buildings

2A 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?

Not Answered

Explain why:

We are uncertain that an overall standard should apply to all buildings in Edinburgh, because of the wide range of ages and construction techniques.

For example, for new buildings Gold or Platinum might be acceptable, but for older buildings (particularly pre 20th century), Bronze or Bronze Active might be more appropriate?

It is presumed there is a relationship between the various standards and cost e.g. Gold + is more expensive than Bronze and these costs would be reflected in the sale price of properties. Might this have an adverse effect on saleability and achievement of housing targets??

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

4A 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

Explain why:

Please see comments at Choice 1A. We support Choice 4 proposed changes A, B. In addition, these changes must be holistic/comprehensive and also include landscape character, views/vistas to surrounding areas, tree/woodland planting, path systems etc as well as the issues outlined.

The NPF appears to assume that Edinburgh will grow ad infinitum. The consequences of this for its environment and greenspaces are a cause for concern amongst many communities/citizens. For reasons of equity and social justice, consideration should be given to consulting the citizens of Edinburgh on 'How big should Edinburgh be' ?

There may also now be a Covid 19 dimension to this issue?

4B 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?:

The preparation of good Local Place Plans by communities will require considerable work. This could be helped/improved if professional advice (landscape, architecture, biodiversity etc) could be provided for communities.

To be credible, this community effort must be given significant weight in the planning process , especially in relation to applications for building development on green spaces.

For reasons of social justice/level playing field/ etc, ideally, consideration should be given to the introduction of ERA , limited to Community Councils and applications for building development on Green Belt/green spaces.

Choice 5 - Delivering community infrastructure

5A 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

Explain why:

Yes, in principle. Choice 5A must be developed to conform with the sustainability

Choices 1-4, including stronger protection for green belt/green spaces. (See also 1D)

The principle of greater use of public transport is laudable, but may not achieve high success e.g. use of private car in bad weather, by elderly/less mobile people, heavy /extensive shopping, etc

Ideally, pedestrian and cycling routes should be segregated. Where shared routes are required, it is essential that a 'behaviour code' for the various users is produced to avoid conflicts and enhance enjoyment of the walking /cycling experience.

5B 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

Explain why:

Yes, in principle . Presumably, this proposal will conform with Choice 4 - the involvement of local communities in the production of Place Briefs.

5C 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

Explain why:

Yes, in principle . Presumably, this proposal will conform with Choice 4 - the involvement of local communities in the production of Place Briefs.

5D.1 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

Explain why:

Yes, in principle. Developers can benefit significantly from the enhanced development value of green field sites and, in these circumstances, should be prepared to make appropriate contributions towards defraying the costs of infrastructure.

Infrastructure contributions from developments on brownfield sites need to be carefully assessed so as not to discourage the reuse of such sites by developers.

5D.2 We want to use cumulative contribution zones to determine infrastructure actions, costs and delivery mechanisms. Do you agree with this?

No

Explain why:

Complications might arise with the implementation of this proposal, if there is disparity between the viability of the various developers involved in a particular zone?

5E 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

Explain why:

Yes, in principle. Presumably supplementary guidance could still be useful if circumstances change during a plan period and existing guidance requires significant amendment?

Choice 6 - Creating places for people, not cars

6A 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

Explain why:

Yes, in principle. See comments on active travel routes in response to Choice 5A

Care will be needed in setting these targets, as the public has strong affection for use of their private cars for a variety of reasons. If the targets are set too high too quickly, the proposal could be perceived as too punitive towards motorists. This could militate against the effective implementation of this proposal.

6B 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?

No

Explain why:

No, because of reservations set out in response to Choice 6A

Choice 7 - Supporting the reduction in car use in Edinburgh

7A 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?

No

Explain why:

This seems a complicated procedure to determine car parking levels in development - it may need frequent revision as circumstances change?

Is a simpler scheme feasible?

7B 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

Explain why:

Yes, in principle.

7C 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

Explain why:

Yes, in principle, if 'charging infrastructure' refers to electrics and not pricing.

'Price charging' for bike parking could be a disincentive for their increased use?

Parking for electric vehicles will also require battery charging facilities to be attractive for use. Hence, it is not clear how a 'price charging' infrastructure can accommodate the extra costs of electric car parking, without being a disincentive. Also if electric car park prices have to be heavily subsidised, this may be perceived as unfair by owners of conventional vehicles.

7D 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?

Yes

Explain why:

Yes, in principle. Existing park and ride sites have been located on Green Belt/greenfield sites around the current city edge. The landscape design of these sites is poor. Insufficient attention is paid to the surrounding rural landscape character and the amount of screening tree/shrub planting and their maintenance. This proposal must seek to rectify this deficiency.

Every effort should be made to locate new park and ride sites in areas that do not detract from the existing rural character

Choice 8 - Delivering new walking and cycle routes

8A 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

Explain why:

Please see comments at Choice 5A. New routes should;

- * separate walking routes from cycling routes
- * walking routes should have sufficient space and easy gradients to accommodate less able people
- * both types of route should avoid areas of poor air quality
- * wherever possible routes should be aligned through areas of good/interesting landscape quality
- * walking routes should be provided with 'dog poo' bins at convenient intervals
- * all routes should be wide enough to facilitate social distancing
- * all routes will require well designed signage, including Covid 19 instructions
- * all routes should be regularly monitored/maintained

8B 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

8C 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

Explain why:

Upload new cycle routes:

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

9A 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

Explain why:

There is an underlying requirement to determine the capacity of Edinburgh to continue to accept tourism. This should seek a reasonable balance between the economic benefits of tourism and the maintenance of an adequate housing supply for residential use and the maintenance of their quality of life.

9B 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

Explain why:

The aims of the new policy appear helpful. See also comments at 9A Will the Council form a policy for current short-term lets to come back into residential use? If so, could that have any influence on future housing need/supply/targets?

mental comments at 9A.

Choice 10 - Ensuring the better use of land

10A. 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

Explain why:

Please see comments Choice 1A. The 'right locations' should also include proximity to the relevant college and the connecting walking/cycling routes.

10B 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

Explain why:

10C 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

Explain why:

The areas redeveloped for housing would need to be carefully chosen to enable a good quality residential identity to be developed. This may also require adjoining 'commercial' landscapes to be improved e.g. more open space, tree/shrub planting, etc

Choice 11 - Delivering more affordable homes

11A 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

Explain why:

Yes, in principle. But new homes should not be built that require the further loss of Green Belt/green spaces, especially green spaces of high quality/sensitivity.

The requirement for developers to provide 35% of affordable homes must be effectively enforced. Currently developers are able to negotiate reductions in the 25% affordable housing requirement on particular sites.

We also support the requirement that affordable houses should 'meet the housing types and sizes which make up the total development'. This should encourage social cohesion between 'affordable and non affordable' residents.

11B 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

Explain why:

Please see comments at Choice 11A

Choice 12 - Building our new homes and infrastructure

12A Which option do you support?

Option 1 (Council/Partners/Urban Area)

Explain why you support that option, or why haven't chosen an option:

The HNDA calculation is not precise - it is more a forecast and subject to a number of variables. Therefore the housing target should also be considered as imprecise, with consequent, accepted flexibility in its achievement. Also not included in this target is any view from Edinburgh citizens about how big should Edinburgh be? Is Edinburgh going to be allowed to grow forever 'ad infinitum' to the detriment of green spaces or should it have a finite size? Should not the citizens be consulted about this fundamental issue?

That said, we support the statements underpinning Option 1.

12B Do you support or object to any of the proposed greenfield areas? (Please tick all that apply)

Support Greenfield - Support:

Support Greenfield - Object:

Calderwood, Kirkliston, West Edinburgh, East of Riccarton, South East Edinburgh

Explain why:

Without detailed assessment/site inspection, these comments are provisional;

CALDERWOOD: Any flood plain issues from River Almond? Good agricultural land (Hutton institute) should be protected. Small development -might have low visual impact. But without an EIA and masterplan, an OBJECTION is the safest option

KIRKLISTON: Good agricultural land (Hutton institute). Large development adjoining poor quality existing development. Design of new development must be significantly improved - see previous comments at Choice 1A. Without an EIA and clear evidence in a masterplan that the design of new development will be significantly better than existing, an OBJECTION to development is the safest option

WEST EDINBURGH: We acknowledge the impetus to develop in west Edinburgh but the eventual master plan must carefully assess a range of important issues e.g. this is an important main approach to the City, the visual quality of this approach is already poor. It is essential that good landscape design is used so that proposed developments on green spaces and good agricultural land do not further diminish the quality of this location. This applies to the Green Belt area south of the A8 and north of the railway, previously identified as a possible site for the Royal Highland Showground and now suggested for housing. Just because it was previously allocated for the showground, doesn't now justify its use for housing; indeed it could be argued that an agricultural showground could be a more

compatible Green Belt use. NOT ACCEPTABLE

EAST OF RICCARTON: With the adjoining ,large Sir David Murray 'legacy' housing development extending to the eastern outskirts of Ratho, this area is already over developed in terms of the significant loss of Green Belt and good agricultural land. NOT ACCEPTABLE

SOUTH EAST EDIBURGH: The eastern areas of this housing proposal would coalesce with new Burdiehouse development and with the mixed development at Straiton, Bilston and proposed housing development at Bush. This and the remaining westerly parts would further urbanise this area, where the visual quality of green space is already severely compromised by transport corridors and pylons. Also good agricultural land would be lost. NOT ACCEPTABLE .

12C Do you have a greenfield site you wish us to consider in the proposed Plan?

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Greenfield file upload:

No file was uploaded

Greenfield file upload:

No file was uploaded

12D Do you have a brownfield site you wish us to consider in the proposed Plan?

Brownfield sites upload:

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

13A 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

Explain why:

Yes, in principle. But new policies for culture and tourism must include an assessment of the capacity of Edinburgh to accept more growth in these sectors without detriment to housing for residents and their quality of life. See comments at Choices 2D, 8A, 9A

Choice 14 - Delivering West Edinburgh

14A 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

Explain why:

What does 'sustainable growth' mean in this context? Does it conform with UN Sustainability Goals, which include requirements for landscape, heritage , biodiversity and the well being of people.? The UN approach must be integral to the West Edinburgh plan. See also World Commission on Environment and Development, 'Our Common Future (1983)

14B 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?

No

Explain why:

Although we agree the removal of the safeguard for the Royal Highland Show, we do not agree with the use of the site for other development purposes. Please see comments at Choice 12 B

14C 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?

Not Answered

Explain why:

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

15A 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

Explain why:

15B 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

Explain why:

15C 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

Explain why:

Not clear about the purposes of such a review?

15D 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?

The use of Supplementary Guidance

Explain why:

Please see comments at Choice 5 E . Retail patterns are likely to change frequently, hence supplementary guidance may be more appropriate?

15E 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?

No

Explain why:

An assessment is needed of how many hotels of different types Edinburgh requires. This is related to an assessment of the capacity of Edinburgh to continue to accept tourism growth - comments at Choice 13 A refer. New hotel construction, often on brownfield sites, prevents the use of such sites for housing? Which is more important?

15F 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?

No

Explain why:

This should be related to an assessment of the capacity of Edinburgh to continue to accept tourism growth - comments at 13 A refer

Choice 16 (part 1) - Delivering office floorspace

16A.1 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

Explain why:

Yes, in principle. We note the statements about the significant demand for office space in Edinburgh, but we are aware of a number of instances, where recently constructed office buildings have remained empty for several years before occupation. What are the reasons for this and can these be mitigated? Could empty office buildings have a temporary use for accommodation?

Is it possible to assess the future requirements for office space in Edinburgh and use this to formulate office policy?

It is not unreasonable to assume that more offices will require more staff to deal with the various enterprises involved. In turn, additional employment, welcome though this would be, could add to the growing size of the city or increase commuting to it? See comments at Choice 12 A.

16A.2 We want to support office development at commercial centres as these also provide accessible locations.

Yes

Explain why:

Yes, in principle

16A.3 We want to strengthen the requirement within the city centre to provide significant office floorspace within major mixed-use developments. Do you agree?

Yes

Explain why:

Yes, in principle

16A.4 We want to amend the boundary of the Leith strategic office location to remove areas with residential development consent. Do you agree?

No

Explain why:

What is the priority - offices or homes?

16A.5 We want to continue to support office development in other accessible locations elsewhere in the urban area. Do you agree?

Yes

Explain why:

Yes in principle, but only if based on a survey of future office requirements in Edinburgh

Do you have an office site you wish us to consider in the proposed Plan?:

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16B We want to identify sites and locations within Edinburgh with potential for office development. Do you agree with this?

Yes

Explain why:

Yes, in principle. se comments at 16 A1

16C 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.

I support no change to policy

Explain why:

No policy change could provide flexibility for alternative uses, including accommodation?

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

16E 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, The Crosswinds Runway

Yes / No - Do not support:

Newbridge, Newcraighall Industrial Estate.

Explain why:

We do not support Newbridge and Newcraighall, as more sites in these areas could further erode green lands and prime agricultural land. Also the landscape quality of existing development is poor.

If Crosswinds is confirmed as not required for emergency airport operations in adverse wind conditions, it could be used as a business/industrial site as the surrounding area is already very 'industrial in character.

16F 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?

No

Explain why:

No, as it seems this policy appears to contradict Choice 10 C, which we support

16G 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

Explain why:

Yes, in principle.

16H 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

Explain why:

Yes in principle - provided the policy is available for public consultation.

Equalities and Rights

17 Do you think there will be any equalities or rights impacts (positive or negative) arising from the Choices?

No

Explain why:

The Integrated Impact assessment appears comprehensive, therefore unlikely to have serious negative impacts

Environmental Report

18 Do you have any comments on the environmental impacts set out in the Environmental Report arising from the Choices?

Yes

Please use the space below for comments.:

The ER appears comprehensive, but it is not clear whether this will be done in house by the CEC or by an independent consultant? We would prefer the use of an independent consultant. Should the ER seek to assess the effects of Covid 19?

The ER does not seem to give sufficient weight to the multifunctional values provided by the Green Belt, as well as the importance of landscape and prime agricultural land for home food production to reduce reliance on food imports vulnerable to adverse climate change effects. There is no mention of the 2008/9 Landscape character assessment of the Edinburgh Green Belt by Land Use Consultants.

For example:

- * Table 3 Relevant Environmental Issues (p.15) does not mention Green Belts
- * Table 4 Methodology for Assessing Choices does not include Green Belt or green networks
- * Table 5 Methodology for Assessing Sites only considers 'defensible boundaries' for Green Belts and not their continued loss to development

We recommend strongly that more weight is given to the stronger protection for Green Belt, landscape quality/value and prime agricultural land.