Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

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	Not Answered
Explanation	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

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	Not Answered
Explanation	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

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 Not Answered

Explanation See rep - cannot be easily summarised

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 No

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 Not Answered

Explanation See rep - cannot be easily summarised

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

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	Not Answered
Explanation	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

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	Not Answered
Explanation	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

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	Not Answered
Explanation	See rep - cannot be easily summarised

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	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

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	Not Answered
Explanation	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

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	Not Answered
Explanation	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

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	Not Answered
Explanation	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

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	Not Answered
Explanation	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

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 Not Answered

Explanation See rep - cannot be easily summarised

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 Not Answered

Explanation See rep - cannot be easily summarised

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:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

Choice **9 A**

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

Short Response	Not Answered
Explanation	See rep - cannot be easily summarised

Choice **9 B**

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

Short Response	Not Answered
Explanation	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

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	Not Answered
Explanation	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

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 Not Answered

Explanation See rep - cannot be easily summarised

Choice **12 A**

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

Short Response Not Answered

Explanation See rep - cannot be easily summarised

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 Not Answered

Explanation

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

Choice **12 B2**

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

Short Response Not Answered

Explanation

Choice **12 B3**

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

Short Response Not Answered

Explanation

Choice **12 B4**

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

Short Response Not Answered

Explanation

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

Choice **12 B5**

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

Short Response Not Answered

Explanation

Choice **12 B6**

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

Short Response Not Answered

Explanation

Choice **12 B7**

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

Short Response Not Answered

Explanation

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

Choice **12 B8**

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

Short Response Not Answered

Explanation

Choice **12 B9**

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

Short Response Not Answered

Explanation

Choice **12 B10**

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

Short Response Not Answered

Explanation

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

Choice **12 BX**

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

Short Response Not Answered

Explanation See rep - cannot be easily summarised

Choice **12 C**

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

Short Response No

Explanation

Choice **12 C**

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

Short Response No

Explanation

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

Choice **12 C**

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

Short Response No

Explanation

Choice **12 D**

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

Short Response No

Explanation

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 Not Answered

Explanation See rep - cannot be easily summarised

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

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	Not Answered
Explanation	See rep - cannot be easily summarised

Choice **14 B**

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

Short Response	Not Answered
Explanation	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

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	Not Answered
Explanation	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

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	Not Answered
Explanation	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

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	Not Answered
Explanation	See rep - cannot be easily summarised

Choice **16 A2**

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

Short Response	Not Answered
Explanation	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

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	Not Answered
Explanation	See rep - cannot be easily summarised

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	Not Answered
Explanation	See rep - cannot be easily summarised

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	See rep - cannot be easily summarised

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

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 Not Answered

Explanation See rep - cannot be easily summarised

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 Not Answered

Explanation See rep - cannot be easily summarised

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 Not Answered

Explanation

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

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 Not Answered

Explanation

Choice **16 E3**

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

Short Response Not Answered

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 Not Answered

Explanation

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

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 Not Answered

Explanation

Choice **16 E6**

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

Short Response Not Answered

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 Not Answered

Explanation

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

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 Not Answered

Explanation

Choice **16 EX**

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

Short Response Not Answered

Explanation See rep - cannot be easily summarised

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 Not Answered

Explanation See rep - cannot be easily summarised

Customer Ref:	00042	**Response Ref:**	BHLF-KU2U-GPK2-U	**Supporting Info**	Yes
Name	Sally Millar			**Email**	secretary@leithlinkscc.org.uk
Response Type	Community Council				
On behalf of:	Leith Links Community Council				

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	Not Answered
Explanation	See rep - cannot be easily summarised

Choice **16 H**

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

Short Response	Not Answered
Explanation	See rep - cannot be easily summarised

LEITH LINKS
COMMUNITY COUNCIL

A response from Leith Links Community Council to the City of Edinburgh Council City Plan 2030 consultation.

April 2020

Contents

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Coronavirus Pandemic - Reflections

The historian Peter Hennessy argues that the events of these times will be distinguishable, from the perspective of future observers, by their occurrence either before the 2020 coronavirus pandemic (BC) or after it (AC).

The timing of this ten-year city plan consultation could be described as unfortunate, to say the least. But it also presents the city with a remarkable opportunity.

Certain core values and ambitions contained within the draft plan will of course persist in a viable format. But much of what is in the plan may have been superseded by events that are still unfolding, that will resonate for a long time, and will need to be reconsidered. Assumptions will need to be reappraised, projections recalibrated, computer modelling rebooted.

We face, by some estimates, the most severe disruption to the global economy that the world has ever seen. And yet this seismic shock to our way of life is nothing when compared to the ever present and existential threat posed by the climate emergency – the adaptation and mitigation measures alone demand system change on an unprecedented scale. **The process of how Edinburgh sets out its plan for the next decade must surely place, front and centre, our civic response to the challenges of this fundamentally transformed landscape. Any aspiration that the current (and faltering) economic model of perpetual growth for the city should just be resumed ('back to business as normal') post-Covid-19 must surely be set to one side.**

This period of global, national and local economic hibernation is a once in a lifetime opportunity to pause, reflect and refocus Edinburgh's collective resources so that what emerges from this consultation exercise is a plan that genuinely serves the needs of all of its people – now and into the future.

As this crisis has unfolded, it has become increasingly apparent that the single most important and valuable resource that this city has is its people. Communities across the city have stepped up to care for their own and, supported by the structures of the Council and others, these communities will emerge from these unprecedented times, stronger and with renewed civic awareness and pride. The City Plan 2030 must, at its heart, reflect this new reality.

Preface

Leith Links Community Council would like to acknowledge the professionalism that has gone into the production of the city council's City Plan (2030) Choices document. It contains many laudable aspirations and policy measures, many of which we will whole-heartedly endorse, and it is well-constructed, covering the great sweep of the city council's municipal reach.

Leith Links Community Council (LLCC) has comments to make on the draft City Plan 2030 as a whole, which we submit here in a single document.

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We will also complete the step-by-step Choices survey, but for the reasons below, we find the format of that consultation process disappointing. In its conception, the consultation explicitly offers only two courses of action (see page 4 of City Plan 2030 – Choices): "We'd like you to consider whether you would support our proposed changes or support our proposed alternative."

This is somewhat typical of City of Edinburgh (CEC) consultations, where potential public respondents are shepherded down preordained routes of the council's own devising, herded within parameters of the council's own priorities and practices, constrained by the constricted conceptualisation of its authors. This top-down prescriptiveness, we would argue, often results in bad decisions being made, the consequences of which are borne by citizens and local communities.

What if respondents prefer to do neither? That is, neither support the proposed changes nor support the offered alternative? What if they support partially, but with significant caveats? What if they'd like to make some suggestions of their own? And what if their suggestions were better than the proposals on offer either way?

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We also note with regret the faltering progress of the process that has led to this consultation document being circulated so late in the day, and the delays caused by shifting legislation. While an updated South East Scotland Plan for strategic development had originally been awaited – before the local Edinburgh plan could be worked on – this was knocked off course by the new Planning (Scotland) Act 2019, which dispensed with the need for strategic development plans in favour of the National Planning Framework (as explained on page 28 - Choice 12).

The cumulative effect of these various delays has been to put time pressure on the production of the Edinburgh plan, requiring it to be turned around quickly, at precisely the moment when a reflective pause might seem imperative, in the light of the coronavirus pandemic and its potential economic consequences (see above, also).

For example, this is surely exactly the right moment to revisit the data and reappraise the computer models – for things like projected overseas student numbers, tourism numbers, hotel bed requirements, population growth etc – taking account of the various emerging realities of the world after coronavirus (AC). Is there scope for some degree of suspension / extension of the process?

We would strongly urge the city council to find and make the time to do just this sort of due diligence, given the profound changes in train, before the local plan is set in stone.

Introduction

Leith Links Community Council (LLCC) supports many of the proposed changes, as reading the undergoing will show, but we have some misgivings and reservations, which will also be obvious.

Priorities

We suggest that the Plan needs to be redrafted in some areas, in order to reflect key values and priorities. Our own top priorities include the following:

1. **Better consultation and collaboration with the Community**
   As a Community Council, we have extensive and bitter experience of decisions on planning applications both large and small in our area that have failed to take into account the needs and views of the local community. **This community overwhelmingly supports immediate reduction of Air BnB /short term rentals and student accommodation, and urgently seeks more social and affordable housing, investment in new infrastructure, and more locally contextualised design**.
   The new Planning Act denies communities any right of appeal. The council must support the development of, and fully take account of community-led Local Place Plans, and Neighbourhood Profiles. Place Briefs and Master Planning for larger development sites must be carried out in full collaboration with the local community. Specifically, this community council plans to work with neighbouring community councils to develop a Local Place Plan and hopes to work closely with the City Council to create a strong Place Brief for development of the proposed large site at Seafield.

2. **Importance of Greenspace**
   The city is suffering from loss and degradation of existing public greenspace and common good land. This must be stopped /reversed. No more tree felling, no more building on greenspace, no more commercial events taking over public spaces, making them inaccessible to citizens, and damaging them. The city needs to invest in better ongoing management of existing greenspace, as well as developing new greenspace.

3. **Tighter Policies, Better Design, Higher Standards**
   We applaud certain visionary elements of the plan although we have concerns about the robustness of council policies, and about the council's capacity to deliver effectively on these. Alongside – or before – 'aspirations', we'd like to see updating, and radical and decisive revision and strengthening of planning policies, and a solid commitment to enforcement of those policies (rather than repeatedly letting developers get away with flouting them). We'd like to see more generous minimum floor space standards for new builds, and more demands made of developers to ensure high quality and sustainable design.

4. **Data**
   The draft plan seems disappointingly data free. But the plan should be based on solid, current, data-driven evidence, used as a basis for future plans. We would like to see the city council invest in new research and publish the data openly and transparently. We need better information on car use and traffic patterns; housing type and density. Demographic projections should be based on early review of 2021 Census figures, and include not only population numbers but also household size and age structures. We need to see tourist numbers; numbers of student housing units and occupation level. We need breakdowns of eg. planned housing units by number of bedrooms; accessibility for older/disabled people. We need to know ratios such as doctors per 1,000 population, school places per 1000, usable greenspace per 1000, etc.

5. **Maintain and manage**
   The Plan should first look to protect and enhance the livability and sustainability of Edinburgh for the city's **existing** population – ahead of the notional future one projected by the theorists of perpetual growth and expansion. The plan needs to place greater emphasis on the ongoing maintenance and good management of existing areas in the common good realm, not just focus on new development. Maintaining and managing our city needs to take account of the ageing population and be fully inclusive for these members of our communities.

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

We like the sound of proposed changes **A**, **B** and **C**, we also support **G** & **H.**

Re D: we very much support the need for clarity re: “under what circumstances the development of poor quality or underused open space will be considered acceptable”.

First, we would like clarity on how the council would currently define “poor quality or underused open space”, giving examples, preferably in our community council (Leith Links) area.

Re E: it looks like the requirement for new development areas to have access to green spaces of more than 5 hectares (an increase from the current 2-hectare standard) might mostly apply to developments on the outskirts of the city?

But why just on the outskirts? It would be interesting for LLCC to see how it might be applied to the mooted significant development at Seafield, which our community council neighbours.

There is an opportunity on brownfield sites to create some truly sustainable, truly affordable, eco-type housing – following the best-practice role model examples of other countries such as Denmark and the Netherlands – rather than the bog-standard, cookie cut-out developments typically delivered by the volume house-builders, their insurable viability lasting only the length of a BC human being's standard-lifespan mortgage.

Seafield, for instance, may be appealing as a development prospect for a number of reasons, sitting as it does on pre-existing transport and active travel routes between settled and established communities. But to just pile in and start sticking up high-rise apartment buildings willy-nilly (like they've been doing back the way piecemeal, westwards, from Salamander Street to Granton) risks putting an already stressed road and transport system into gridlock; its existing community infrastructure bursting at the seams, its amenity overwhelmed.

This area badly needs some joined-up thinking from every stakeholder (inc CEC, Transport Scotland, Lothian Buses, community councils, neighbouring communities) and not just the landowners and developers , to stress-test the project's feasibility and viability, and consider its knock-on effects, particularly for Portobello, Craigentinny, and Leith, but also for the functionality of the city – and specifically its north-eastern quadrant – as a whole.

It needs to be justified in an evidence-based fashion, with plentiful data. And it needs a Masterplan, one not led just by the council and developers in tandem, but with communities centrally involved from an early stage.

Re F: We do firmly support this. But not if it’s just implemented as an ‘easy, cheap option’. For example, in our own area, it might be tempting to allocate a further area of Leith Links in this way (as we already have allotments and a community croft growing project). But actually, what is really needed on the disused bowling green area of Leith Links is a re-mastered community sports facility including e.g. something like a fenced 5-a-side football pitch/basketball court, alongside the tennis courts, pétanque alley.

However we will be looking at other open spaces within our urban area that might be used for food growing.

Choice 2 | Improving the quality and density of development

We support the broad sweep of this section, and welcome the renewed focus on “site lay-out, public realm, and open space and water management” for new developments. However we are concerned that ensuring that ‘sites are not under-developed’ is another way of saying ‘all sites must be high density’ – and that that could lead to over-development. We would have serious concerns if the proposal includes ‘junking’ the current DES 1,3,6,7,8, HOU 4, Env 20

The introduction states with commendable honesty: “Our design policies are generally strong and are largely fit for purpose, however we recognise that we don't always achieve the best outcomes for our city.”

This is quite an understatement. **The patience of the citizenry has been sorely taxed by what’s been going on in Edinburgh and the surrounding area for the last two or three decades (indeed much further back!), regarding new developments and the stewardship of the public realm. What we’ve been getting is emphatically NOT good quality, sustainable, imaginative, attractive, sympathetic and well-integrated development, and this consistent failure to achieve good outcomes continues to rankle more than somewhat on the ground among the people affected**.

Citizens are disgusted that the council keeps letting developers get away with it... encouraged by central government, enabled by legislation, sweetened by cash incentives in the service of housing targets... to such an extent that citizens are firmly convinced that the council is essentially in cahoots with the developers and all too often *against* the local environment and *against* the local communities.

Be it the rushed short-termist student accommodation blocks cropping up all over the city at the cost of much-needed housing for permanent residents, the rash of invasive, overly dense residential "urban regeneration" projects, the variable-quality housing schemes and estates erupting in green spaces on the fringes of towns across the Lothians, the pile'em-high/sell'em-cheap ugly housing blocks ribboning along the north-shore waterfront – the quality of the new-build environment permitted by this and other councils has, all too often, been emphatically not “fit for purpose”.
The impact of all this sub-optimal construction has been to substantially degrade and diminish not just the immediate area of the development site itself but the wider environment too – clogging up the central belt, and strangling its towns and cities.

We would like to think that – After Coronavirus – the march of this kind of poor quality development is stoppable. Time for a rethink. This is not just about planning / building standards – everything is linked, e.g. tourism policies, transport policies etc.

Because of rising house prices and shortage of housing (largely/partly driven by over-tourism, Air BnB etc.), citizens are forced to buy homes outside the city, and to commute into work, very often by private car. It is no accident that Edinburgh’s commuter traffic congestion is now among the worst in the UK, whereas just a few short years ago (some of us recall) it was among the easiest, the whole city region having been snarled up by a development-led increase in traffic volumes.

We are supportive of proposal **A**, regarding environmental sustainability and accessibility. The fact that we have an ageing population needs to be taken more into consideration. There is an urgent need for new housing in Edinburgh that is suitable for older people who are downsizing. The only way to free up larger family homes for sale to younger families is by there being somewhere suitable for their owners (elderly couples facing decreasing mobility etc.) to move to. They do not want tiny flats in high rise blocks, with no greenspace and no parking spaces. Where are the smaller inner city courtyard developments with groundfloor apartments? Apartment blocks with shared facilities? Perhaps we should be building as many retirement complexes as student blocks..?

Re B (“making best use of the limited space in our city”), we have questions: what would a minimum of 65/100 dwellings per hectare look like?

What would “A vertical mix of uses to support the efficient use of land” mean, for instance, at the Seafield waterfront? How high is too high? Densely packed high-rise blocks may be bearable **IF** the land next to the block is well-maintained usable greenspace, for play and exercise etc, and with access to a coastal path etc – but not bearable if the blocks are just squeezed up next to each other with no open space around them.

Overall, we welcome this section’s requirement for a design and access statement regarding future adaptability and accessibility to apply to “all development (including change of use)”, and we would hope that this would be rigorously adhered to in practice.

Choice 3 | Delivering carbon neutral buildings

LLCC would certainly be in favour of aiming for best-in-class practice, i.e. all buildings and conversions being required to meet the zero-carbon "platinum" standards and not, as at present, settling for the Scottish Building Regulations' bronze, silver or gold standards.

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

While we are very supportive in principle, a lot will depend on how this is implemented in practice. The relationship between Place Briefs and Local Place Plans (LPPs) needs to be explicit from the outset in terms of which mechanism has primacy and which shapes the other.

We see the potential for confusion and potentially even conflict between the Council's commitment to use Place Briefs as a means of directing future development and in particular for all new housing sites, and Local Place Plans as a device to make planning more collaborative. The new Planning Act indicates that Councils merely have to show "due regard" for LPPs which in our view could give them very little weight in the process of shaping what actually happens on the ground. Whereas Place Briefs could become the Council's default engagement tool to inform communities what it plans to do. LLCC supports making community involvement the *sine qua non* heart of the Place Brief (whether in the form of an LPP or otherwise).

More specifically, we are concerned about the future development of the brownfield site at Seafield which abuts the community council areas of Portobello, Craigentinny and Leith Links. This site represents the single largest brownfield site in the City and is therefore inevitably in the minds of the planners and developers when seeking to meet the target that Edinburgh has for 40,000 new houses.

We could see a potential muddle/conflict of Place Brief and LPP processes here. If the Council develops a Place Brief for the site, even with a full programme of community engagement, past experience tells us that the development of the site could quickly begin to become developer-led, leaving the community to play catch-up and react to each developer's proposal in piecemeal fashion.

This site is so significant in terms of the long-term future of our three communities that the community councils affected have collectively agreed to get on the 'front foot' and call for a community led Masterplanning exercise in conjunction with CEC. This will ensure that our concerns, in terms of ensuring the overall design, housing tenure mix, environmental quality and local economic impact align with the aspirations of all three communities and the wider city environment.

In an ideal world and perhaps at some point into the future when the scope and purpose of Local Place Plans have been clarified and properly road-tested, this master planning exercise would reflect the LPPs of all three communities. But LPPs so far remain uncharted territory within Scotland's planning system and we are not prepared to take that risk with the future of this strategically important site. The community must be involved in Masterplanning and Place Briefs and not just 'relegated' to LPPs which may or may not turn out to have any actual clout.

Choice 5 | Delivering community infrastructure

We are very clear that the city needs to be building **new communities**, not just new houses. That means, for larger scale sites, Master Planning and Place briefs, in collaboration with local Place Plans developed by the community, that include/integrate **within the design of new developments** the key elements of a mini village – not just tacking on, in the final stages of the planning process, a 'bill' to developers, for a financial contribution towards 'infrastructure' (unspecified).

And the city must **definitely not** be prepared to 'waive' infrastructure contributions from developers, or to spend these in ways that actually do not directly benefit the inhabitants of new developments and their immediate neighbourhoods.

Similarly, while planning new building, Edinburgh needs to recognise and act on the need to protect and support existing communities. New developments of scale must not simply be allowed to 'leech' on the infrastructure of existing communities.

In this respect, we have severe reservations about CEC's stated intention to 'direct development to where there is existing infrastructure'. In and around Leith, this has arguably already been done to saturation point. It cannot continue unabated – new infrastructure must always accompany new building.

Building new communities and protecting existing communities is something that Edinburgh has failed to do well, so far. New housing developments seem to either 'leech' on existing communities leading to increasingly overcrowded schools, healthcare facilities, parks and buses, or else (when on the outer fringes of the city, turn into rather isolated 'dormitory towns' that do not include commercial/light industrial sites that might afford local employment opportunities, and that often require car use to access basic facilities such as schools, supermarkets, leisure facilities, good quality greenspace etc.

Design needs to be cleverer and better, and developers need to be held to account to ensure that they provide infrastructure alongside profitable (for them) housing.

Design needs to

- Focus on the people who will inhabit the new developments.
- Reduce the need for inhabitants to travel for employment, leisure etc. (whether into the town centre, or out of town) by providing local employment opportunities.
- Respect the character of existing neighbourhoods.
- Support / develop local High Streets and small scale local commercial centres, and stop permitting / building out of town malls.
- Provide good quality greenspace in proportion to the density of new housing, along with a commitment to ongoing maintenance of greenspace.
- Provide for local active travel and connectivity within the development, eg. path networks, cycle routes.

Re E: Fully support. To achieve this, the city needs a new, clear and very robust policy on the contribution that developers will be required to make – and the level of contribution needs to be made much higher.

Re D: We are interested by the concept of 'cumulative contribution zones' whereby the impact of all developments within a defined zone on existing infrastructure is calculated together, with the cost then shared equally. We like the 'integrated approach' that this implies. But this requires some further explanation – surely developers of very large/dense housing developments should contribute more than small-scale developers?

We are emphatically clear that developers of student accommodation must be required to contribute equally, alongside developers of all other types of housing etc. It is unacceptable for them to be allowed to 'pick and choose' as to which services their residents might be likely to use, in a neighbourhood. That is not how things work – if they are in a community, they are part of the community and should contribute as all other community members do.
Within and on the fringes of our (Leith Links) area, where there are likely to be many new developments, of high and dense housing (for example, the proposed Seafield site), increase in population density must be matched by a clear increase in not only the usual (electricity, water, sewage etc.) but also a mandatory matching increase in:

- Schools, Health and Transport infrastructure (see below).
- Public green space, outdoor leisure / sports facilities, play facilities.
- General amenity such as attractive building design that is in proportion with neighbouring buildings (height, density), and protection of /or creation of attractive vistas.
- Commercial / light industrial infrastructure such as small workshops, garages, DIY outlets.
- Social infrastructure such as libraries, community meeting space, shared co-working space, etc, as well as retail.

Education Infrastructure
Urban Area Sites (Choice 12, Option A and/or Option C)
LLCC strongly supports proposals to build both new non-denominational Primary Schools and a new Secondary school in North Edinburgh – Leith specifically.
In Leith, the local population has already grown extraordinarily rapidly due to lower house prices/rents and high density housing being built in brownfield sites across the area. Local schools are already bursting at the seams. Class sizes have been increasing and parental choice is reduced, because of this congestion. Further house building within the area is bound to continue apace and to accelerate under both Options A and/or C, which will make this issue even more urgent.

Because greenspace is at a premium in this very densely populated part of North Edinburgh,

- No new school should be built on what is currently greenspace.
- No new school should be built without including an area of open greenspace in its design.
- All new schools should include not only greenspace for play/sport, but, with an eye to climate change and sustainability, healthy eating etc., some space for planting and growing.

Healthcare Infrastructure
The population in Leith has already grown rapidly due to high density housing being built in brownfield sites across the area. This is likely to continue/accelerate in the future under both Options A and/or C, and there is an urgent need for more local Primary Healthcare facilities, especially GP services, but also including community pharmacies, and ancillary services (particularly needed by an ageing population) such as chiropody, physiotherapy, etc. A (mobile?) Minor Injuries Unit located in Leith would be desirable since it is impossible to get to the Western General Hospital by public transport from Leith without changing buses (at Crewe Toll) or having to walk half a mile.

Transport Infrastructure / Connectivity
Leith should be well connected to the city centre by the tram but there is a marked lack of connectivity to other parts of the city, to the west and east, eg. to the Western General Hospital, and to Portobello & Musselburgh, and direct links to Park and Ride facilities; this needs to be addressed by a review of bus routes (Lothian Buses). If necessary, CEC should subsidise bus routes that are not profitable, e.g. to Western General from Leith. Like other European cities transport in Edinburgh should be integrated where one ticket allows commuters to travel using bus and tram. Connectivity should be easy to follow through the use of user-friendly route planning and timetables.

Sewage Infrastructure Local Development Plan (2016) policies under revision:
Provision of New Waste Management Sites (RS 3) Waste Disposal Sites (RS 4)

LLCC represents the community on the Seafield Wastewater Treatment Plant Stakeholder Group. We welcome the recent commitment by Scottish Government to build a new state of the art sewage works on the current site, in future. Any new plant must be future-proofed and have built-in capacity to service the needs of the growing population of Edinburgh and the Lothians over the next century.

The current sewage plant is demonstrably not fit for purpose. For years, citizens living in Leith have had to endure disgusting smells of human waste coming from the Seafield Waste Water plant which is operated by Veolia on behalf of public body, Scottish Water.

The local community – having been promised on a regular basis that measures would be taken to reduce odour emissions – continue to live with a seriously 'bad neighbour' where managers react to, rather than managing, areas/processes within the Seafield complex where problems occur on a regular basis.

Odour emissions can be traced to uncovered primary settlement tanks and/or storm tanks but the current operators consistently fail to take action timeously to prevent the public being subjected to disgusting smells. This is a major issue to be considered in the plan to build large numbers of new houses on adjacent brownfield areas at Seafield. How 'livable' can these new homes be, if the Council consistently fails to enforce the Code of Practice on odour, at the Seafield plant?

Any new sewage works should be designed to cope with increases in population and should be capable of eliminating (rather than just 'managing' – or NOT managing as at present) odour emissions.

The new plant should fit into the local Masterplan/Place Brief, and the coastal path route should be able to pass the plant without knowing it was there. There are examples of excellent sewage works in other countries, for example New York.

Scottish Water could organise an international design competition to provide a 21st Century Edinburgh with sewage works to be proud of, with green credentials.

Roads/Access – The road (and bridge) along from Leith Links to the roundabout at Portobello needs to be redesigned. Access to the current Waste Disposal Site is currently dangerously situated on a bend in the road.

Choice 6 | Creating places for people, not cars

LLCC is anxious to ensure that **accessibility** is given adequate consideration in all design guidelines and planning.

Statutory consultation on accessibility tends to focus predominantly on wheelchair users, and those with sensory impairments, eg. blind and visually impaired people. Both of these are, of course, important, but these conditions affect a relatively small percentage of the population.

We would stress that a **much larger** number of citizens may not have a wheelchair or a white stick but **equally/also** have disabilities that impair their mobility, to a greater or lesser extent, due to them just being older (slow walking, lack of strength/energy/stamina, arthritis in hips and/or knees, poor balance etc). With an ageing population, this represents a substantial proportion of the citizenry of Edinburgh – and the council needs to take full cognisance of this reality.

Many illnesses and disabilities – or intermittent or 'transient' conditions – that cause pain and that limit mobility are 'hidden' – such as ME, fibromyalgia, MS, Parkinsons etc.

Other citizens have congenital or acquired cognitive impairments such as learning difficulties, autism, stroke etc. that mean that they cannot travel alone but may need carers with them.

ALL of these people need a livable and accessible city. But many/most of them will not be able to walk far, or cycle. They are likely to need:

- Ground-floor living, and/or flats that are designed with lifts to all floors.
- Wide, well-maintained pavements.
- Public transport that offers
    - Bus stops that are not too far apart (200-300 metres is more realistic than 400 metres).
    - Buses with space for wheelchairs (as well as prams/buggies) and for users of rollators (also perhaps for foldable electric mobility scooters (or trams and trains, if not on buses).
    - Buses that go where people want to go (a variety of peripheral routes, not just all into or via the city centre).
    - Bus routes that allow for a single through journey, not all via 'Hubs' that will mean getting on and off several buses and waiting around for bus transfers (dangerous in bad weather).
- Car access (to their homes, and to public areas and retail centres).
- Parking spaces at their homes, and around public areas and retail centres.
- Roads and parking spaces for delivery vehicles.

Parking
We recognise and accept that reducing parking is one way to reduce emissions and to reduce congestion and thereby make the city, and new housing development, more 'livable'. But –

- Increasing parking restrictions must not be done until the corresponding improvement in public transport and in pedestrian and cycling infrastructure are in place.
- Apart from some basic 'sorting out' of a few stops that are historically misplaced, there should not be a 'policy-based' reduction in the number of bus stops / lengthening of the distance between bus stops, as this is discriminatory towards older people and those with disabilities, also potentially parents of small children.
- As 'general' parking is progressively reduced, there needs to be consideration of increasing the number of disabled pick-up/drop-off points, and parking spaces.

Choice 7 | Supporting the reduction in car use in Edinburgh

LLCC broadly supports the aim of reducing car use in Edinburgh. But we think there is too much emphasis placed on cycling, and not enough on walking and public transport. Not everybody can cycle. Once again, LLCC is anxious to ensure that **accessibility** (see above) is given adequate consideration in all planning, bearing in mind the ageing population and the reliance that older and disabled people have on car use and public transport.

Public transport and parking policies are currently not well-adapted to the day-to-day travel patterns of our diverse, and ageing population.

City Planners seem to be locked into a 'male -centred' (and increasingly out of date) uni-dimensional 'commuter' view of travel – i.e. that people leave their home in the mornings, travel into town (or wherever) to work, stay there all day, and then travel back again, on the same route in the evening.

In fact, more and more people are self-employed, or work part-time, may work several jobs, work shifts, may work from home. Pensioners do a lot of child-care, may be healthier and do part-time work or volunteering, and need to get out and about for physical and mental well-being. Research shows that women make more use of public transport than men, but have been shown to 'trip chain' rather than to commute i.e they plan their travel around a list of tasks, both family-related and work-related, and make a larger number of shorter trips 'around and about' to various destinations linked to this sequence of tasks, rather than a repeated single long daily trip.

Walking and bikes may be part of this, but it is difficult to pick up toddlers from nursery, or to take an elderly relative to the doctor, by bike. They need public transport – and many will use cars if the public transport routes are not flexible enough to cover their needs.

Some further observations:

- Cars will still/always be needed/used, so progress towards small electric vehicles is important.
- Car Club is not a viable solution for reducing car ownership and use until they have sorted out charging issues for electric vehicles.
- Parking for bikes is much needed but there is a huge security problem – bike theft is rife across the city – so better, more weather-proof and more secure bike parking solutions must be found.
- Many cycle routes in the city are unsafe, these need to be properly segregated from traffic. Specifically, cycle routes through Leith, and along the tram route beyond the foot of Leith Walk, need attention.
- Do we need to be looking at charging stations for electric wheelchairs and mobility scooters, as well as four-wheeled vehicles?

Park and Ride
LLCC supports the principle of Park and Ride, and the safeguarding of sites for this use.

The problem that we have in Leith is that there is no Park and Ride adequately serving the north-east of the city. The residential eastern reaches of Leith Links – our area - is BECOMING a de facto on-street Park and Ride, because of this, and this is likely to get worse when the tram is up and running. Extending parking restrictions down Leith Walk and into Leith will just make the problems worse for our area, as it will push the parking problems to the edges of the controlled parking zone. We need better Park and Ride facilities serving the NE of the city.

Extension to the Newcraighall P & R might help, so we would certainly support that. Instead of just running buses into the centre of the city from there, buses should run into Leith, or to the centre via Leith.

And/or could a further smaller Park and Ride site be identified, in collaboration with East Lothian, on the fringe of Musselburgh, with buses running into Leith?

Parking
We recognise that parking restrictions are necessary. Some observations:

- **Leith has particular parking problems already due to being a tenemented, high-population density area. Because so many new homes are and will be built on brownfield sites in Leith, with few or no parking spaces provided within the developments, the pressure on on-street parking in Leith will become intolerable.**
- There has to be some kind of 'enforcement' so that people buying flats in new developments without parking spaces cannot just keep their car nearby, on-street. For a start, they cannot be allowed to purchase Residents Parking Permits for the area, once a CPZ is introduced in Leith Walk and Leith.
- A CPZ is only a partial solution in an area where there are already not enough parking spaces for existing residents.
- Consideration needs to be given to the fact that if a CPZ is introduced in Leith Walk and Leith, it just pushes the problem on to the areas at the fringes of the zone. i.e. to Leith Links. Flexible solutions – perhaps along the lines of the Priority Parking system – need to be found for our area.
- **As 'general' parking is progressively reduced, there needs to be consideration of increasing the number of disabled pick-up/drop-off points, and disabled parking spaces, both in local neighbourhoods (eg for attending doctor, church, community events) and in the city centre (for shopping, socialising, culture etc.), or Edinburgh will become progressively inaccessible to older citizens and to disabled people.**

Choice 8 | Delivering more walking and cycle routes

We support all of the recommendations that would deliver more routes for walking and cycling in the city.

With respect to cycling routes, we would recommend that new routes take the form of protected spaces from car users.

In particular, to encourage more pedestrian activity, we would recommend that the City provides more street furniture in the form of benches to encourage sitting and rest stops for less active pedestrians.

We would also propose that the City Plan aims to somehow facilitate a spirit of mutual respect and consideration between cyclists and pedestrians – in areas where both modes of transport co-exist within the same space – as this is a problem area currently.

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

As a general principle we strongly support the proposal to introduce Short Term Let Control Area, ideally for the City of Edinburgh as a whole. While seeing a possible need for 'phasing in' such city-wide controls, simply on the grounds of practicability, we absolutely do not support the idea of introducing STR Control Areas selectively in just one or two parts of the city. Air BnB and similar, and other Short Term Rentals are spread very widely throughout the city and not restricted to particular neighbourhoods.

We also strongly support creation of a (hopefully very robust and strongly enforced!) new policy on the loss of homes to alternative uses, requiring planning permission for a change of use of residential flats and houses to short-stay commercial visitor accommodation or other uses.

We do not support the building of more student accommodation in areas that have traditionally been homes. We do not support the change of use to yet more hotels and guest houses in areas that have traditionally been homes.

Choice 10 | Better use of land

We strongly support the proposal to update, revise and to firm up into policy, the guidelines on student accommodation and ask urgently for new research on the numbers and distribution of students across the city, as we feel that the data on which developers currently make their claims of 'need' for more student accommodation, are flawed.

In particular we support the requirement that there has to be a direct relationship between student accommodation and specific universities or colleges, this is not an appropriate area for 'speculative building' by profit-hungry corporations that have no interest in the city or in higher education, but merely in their own profits. We also strongly support the revision to existing policy that all new developments coming forward for student accommodation or hotels etc. above .25 hectares must contain 50% of the site for housing.

Re C: Instead of everything being focused on students, we would also like to see development of low rent housing within the city reserved for 'essential workers' (now better recognised, After Coronavirus) such as nurses, police, care workers etc. who are now justly seen as key workers but who receive low salaries and cannot easily afford commercial rents/house prices. This might work out well in the retail units, as proposed.

Choice 11 | Delivering more affordable homes

We support the proposal that all housing development, including student accommodation, should contain 35% affordable housing. We suggest that for developments less than 12 units there should still be a level of affordable housing required, although perhaps on a sliding scale of 25% down to the smallest developments of 4 units.

Most so called 'affordable housing' is not in fact affordable for very many people in our community, even those who are working but who are on low wages. We would support a review of how affordable housing is defined to reflect average wage levels within a given locality. There is actually a need for social housing (council housing) rather than 'affordable', as it is clear that too many people are effectively completely priced out of the market.

In Leith, as elsewhere, to be able to buy a house people currently must move out of the city often to Mid or West Lothian, and then may have to commute in for work, leading to increased car use, traffic congestion, air pollution etc.

We strongly support an absolute requirement that all affordable housing per development should be delivered on-site (i.e. not waivered / 'relocated' to somewhere else in the city). We would very much like to see more homes, including affordable homes, right in the city centre.

We would like to see a city where citizens can afford to stay in the area where they belong, if they wish to, and within easy reach of their workplace by active travel or public transport.

Choice 12 | Building our new homes and infrastructure

We support Option 1 but with some important caveats

1. To avoid overcrowding, and to create new communities that are truly livable 'places', brownfield site development must include:
    - Better support of existing infrastructure and addition of significant new local infrastructure (See Choice 5)
    - Better / Increased recognition of the value of greenspace
        - No loss of existing greenspace, minimum tree loss, new tree planting.
        - Addition of good quality new greenspace.
        - Emphasis on ongoing good management of greenspace.
        - In Leith / Seafield / Portobello specifically, emphasis on both greenspace and also access to the shore and 'linear park' in the form of a coastal path / cycleway linking Portobello beach through Leith to Newhaven, Granton, Cramond.

2. Better engagement and collaboration with the local community to ensure that the context of specific sites, the character of existing neighbourhoods and the needs of the local community are well understood.

3. Better data, to evidence needs, and to tailor design to need – not only need for new housing, but the need of the local community for new development that 'fits' the local neighbourhood.

4. Real 'mixed use' to promote /support small businesses, both in retail but also on commercial / light industrial sites, to provide local employment, reduce the need for travel and preserve the character of the neighbourhood.

5. Better, more imaginative and innovative, and more local design that respects the local neighbourhood context.

6. More localized, integrated, and coordinated design and development, by requiring, for larger sites, all the different developers to collaborate and work within an overall Place Brief that respects the local context .

7. Better housing quality standards – need for reassessment, we cannot keep building 'shoeboxes' of minimum size.

8. MUCH higher 'green' standards must be an obligatory factor in new housing standards. E.g. all roofs must include solar panels/power collection.

New housing development on brownfield sites must -

- Provide the kind of housing that is most urgently needed. In the Leith area, that LLCC represents, that is predominantly social housing and affordable housing. Not high priced market homes.
- The homes should be delivered by the Council and its Partners.
    - Ideally, if possible, new market housing should be sold only to people who are going to live in the development, or to Edinburgh-based concerns – not to overseas property investors, global corporations, property speculators, absentee buy-to-let landlords. Housing is a human right, not a commodity.

AIRBNB and other Short Term Rentals across the city need, very urgently, to be reduced in number, and the properties returned to the housing stock of the city for 'ordinary' long term residential rental (or sale). We support introduction of STR Control city-wide, see Choice 9

This cannot be achieved without immediate changes to legislation, by-laws and policies, which must be implemented as soon as possible.

Enforcement of said laws and policies must be carried out rigorously.

Student Housing
We strongly support the intention to revise and turn Guidance on Student Housing into firm policy. See Choice 10

We feel that student accommodation has already reached saturation point, in Leith, and should not be expanded any further.

Indeed, contraction of existing provision may be indicated. Especially following the COVID-19 outbreak, whose long term effects are likely to include a significant reduction in the numbers of overseas students seeking to travel to study/live in Edinburgh.

Having said that, all and any student housing that is built must be required to have the potential to be turned back into housing units if/as and when required.

Option 3A - While we think that most new development should be on brownfield sites within the city, we do feel that there is scope for release of some Greenfield land, on a very limited scale.

Specifically, we support the Cockburn Association's suggestion that greenfield land could be released at Area 3 – Kirkliston – provided that adequate new infrastructure is also provided, particularly a new High School.

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

This section is among those particularly affected by the changes that are likely to be accelerated After Coronavirus, regarding “how retail trends develop” etc, and may be among the first to require revision.

LLCC has a particular interest in Leith town centre – from the top of the Walk to the docks, densely flanked all the way down. This area is famous for its diversity, and large number of small independent shops and businesses, it is a very complex ecosystem, which has been massively assaulted in recent years – twice – by tramworks. We very much want to participate in its protection. We seek the council’s cooperation with that, and expect to be involved.

We are not supportive of new hotel building, we look forward to research data to get updated figures, but we have seen data showing that existing hotel beds (Before Coronavirus) were not fully occupied. There is a strong movement against ever-increasing growth of tourism in Edinburgh. The best way to guard against this is to limit the number of hotels etc.

Choice 16 | Delivering office, business and industrial floorspace

We are very wary of the proposal to drop protection of ‘employment land’ which is currently protected as part of mixed use development. This could seriously impact areas like Leith, which historically has an industrial background, and where diversity of use is part of its fundamental character.

Having said that, we do want to see continued support of “office use at strategic office locations” including Leith...

We’d like to know more about what is involved in the council’s stated intention **to *"amend the boundary of the Leith strategic office location to remove areas with residential development consent."***

C - We support the council's intention to introduce a “loss of office policy to retain accessible office accommodation”, city-wide. This would not permit the redevelopment of office buildings other than for office use...

Business and industrial floor space

A – “We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations:”

“Leith Docks: Seafield (Eastern Leith Docks), Britannia Quay and land to the south of Edinburgh Dock potentially as part of mixed use development.”

This sounds good in principle, we would like to see more detail and data. And we would like to protect light industrial uses around the eastern side of the docks.

We certainly see a great need for more locations around Leith for goods distribution hubs. Leith used to have lots of railway land and many large ‘goods yards’, but much of this land has now been lost to housing. The only possible way to reduce vehicle use is to reinstate areas on the edge of Leith where large delivery vehicles can offload. The eastern edge of the docks, at the Seafield end, would be well suited for this. Therefore it should not be swallowed up by new building of office/business units.

We’d like to see compulsory purchase by the council of the land along Marine Drive, to the west of the Sewage plant, along to the docks. This land, currently owned by Forth Ports, is not used, nor is it maintained by FP. It is a known blackspot for (literally) industrial scale fly-tipping. It should be returned into use as a goods distribution hub, with a green corridor through it for a coastal path and access to the shore.

With thanks to Community Councillors Angus Hardie, Sally Millar, Andrew MacKenzie and Jim Scanlon for their work in producing our consultation response.

To learn more about Leith Links Community Council please visit our website, where you may also download a copy of this report.

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