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   No

Explanation   What does this actually mean? The first part of the question could quite easily be seen as a 'motherhoodstatement'– being a vague, "feel good" platitude, that few people would disagree with but it's lacking in detailand unclear precisely what it would actually achieve.However, would it be sensible that new developments are encouraged to connect locally with greenspaces thatcontribute to the overall amenity of that development & the health and well-being of its residents? Then of course,yes.

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   No

Explanation   Despite agreeing in principle with increasing many of the specifics of green and blue infrastructure, as described -this is a very prescriptive.We agree and support the need, as part of a health and wellbeing economy, to prioritise green / blueinfrastructure where appropriate (as stated, this could include trees, living roofs, and nature-based drainagesolutions (e.g. permeable parking areas) as well as making best use of natural features in the surroundingenvironment). However, including this as a non-negotiable blanket requirement (including change of use) seemstoo prescriptive. If there was a presumption for inclusion unless clear reasons were advanced not to include – thenperhaps more workable?

Customer Ref:	00301	Response Ref:	BHLF-KU2U-GPFV-T	Supporting Info	Yes

Name Carol Nimmo

Email chair@ntbcc.org.uk

Response Type Community Council

On behalf of: New Town and Broughton 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 Yes

Explanation However, difficult to think of locations in the city centre besides East Princes Street Gardens!

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 No

Explanation here should be a strong presumption of no development on existing open space in the city centre. Rather thanjust consider circumstances under which development would be considered acceptable, consideration should bealso be given to demonstrating why the poor quality open space cannot be improved. Similarly for open spacesthat are under-used – understanding the reason behind the lack of use should be explored fully as well as themetrics to define 'under-use'.

Customer Ref:	00301	Response Ref:	BHLF-KU2U-GPFV-T		Supporting Info	Yes

Name: Carol Nimmo

Email: chair@ntbcc.org.uk

Response Type: Community Council

On behalf of: New Town and Broughton Community Council

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   No

Explanation

The current policy, Env ⬚0, (which applies to new developments only) states " The Council will negotiate the

provision of new publicly accessible and useable open space in new development when appropriate and justified

by the scale of development proposed and the needs it will give rise to. In particular, the Council will seek the

provision of extensions and/or improvements to the green network."

Although subjective and perhaps in need of strengthening, Env 20 does contain sensible conditions. Changing this

requirement to an 'Extra large green space standard' (being ⬚ hectares) seems a very large increase in area and

there are concerns that, given the stated need to provide more housing, having such a large space standard could

result in more land being needed for development which may be, in part, in the green belt, and / or reduce the

land available for housing so regard this as too onerous.

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Response Type Community Council

On behalf of: New Town and Broughton 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 Yes

Explanation As well as being a Scottish Government duty ("Guidance as contained in sections of Part ⬚ of the Community

Empowerment (Scotland) Act 2015"), evidence from current allotment waiting lists clearly support the need to

provide more space for allotments, whether that be for food growing or the more general need for 'open space'.

Provision of community gardens as part of large, new developments instead of (or perhaps as well as) small private

gardens is worthy of further consideration. Identifying further potential sites for additional allotments within the

urban area is also supported as an aspiration but this is an either / or choice (as land is a precious commodity).

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

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Name Carol Nimmo   **Email** chair@ntbcc.org.uk

Response Type Community Council

On behalf of: New Town and Broughton Community Council

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

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 Yes

Explanation It is clear that longer term maintenance of green spaces is important as it is both the extent and the quality of the space that is important. Too often, and there are many examples, new 'green' spaces suffer from lack of ongoing maintenance and degrade over time – resulting in decreasing usage. We are aware of limited powers currently available – normally through conditions attached to approval of planning applications, to ensure ongoing maintenance for a number of years. There are also several successful private factoring arrangements for the management of communal open space e.g. Powderhall village and would seem preferable to the alternative of adoption by the Council (and the resultant longer term cost pressures). Longer term maintenance and management processes should also be in place for public greenspaces especially 'Common Good Land', currently under the care of the Council.

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Response Type Community Council

On behalf of: New Town and Broughton Community Council

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 Yes

Explanation NTBCC fully support the proposal that all development will incorporate design measures in regard to futureadaptability. It is important that new building in the city centre, from high value apartments, student flats, hotelsand industrial units, are designed to be adaptable to possible change of use, that development is future-proofed.For instance, student flat builds should have floor plans which allow for flexibility as to apartment size, be it forstudio rooms, family apartments or hotel suites.It is also essential in the city centre that future development enhances accessibility and adaptability for those withvarying needs. An inherent part of Edinburgh's city centre is its residential nature, and new development mustensure that all future residents can enjoy access both to their homes and to the city.

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 Yes

Explanation By default, new development in the city centre will be a redevelopment of an urban area, a brownfield site. Withthe very limited and sensitive brownfield sites potentially available in the city centre, NTBCC do supportdensification of new build where appropriate. Most of the city centre residential supply is historically 'vertical' sothis design model should continue to apply. The value of these assets must not be wasted by under-development.However, of upmost priority must be that future development is of the highest quality of design and built to thebest standard. Densification should not mean small and smaller living spaces, which has become the norm incontemporary apartment design within the city.

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Name: Carol Nimmo

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Response Type: Community Council

On behalf of: New Town and Broughton 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:

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: Yes

Explanation: All new development should deliver opportunities for people to enjoy a high quality of life within an attractive andsafe environment which encompasses natural open landscapes. (but with the exception of the reference to drying space)

| Customer Ref: | 00301 | Response Ref: | BHLF-KU2U-GPFV-T | Supporting Info | Yes |

Customer Ref: 00301   Response Ref: BHLF-KU2U-GPFV-T   Supporting Info: Yes

Name: Carol Nimmo   Email: chair@ntbcc.org.uk

Response Type: Community Council

On behalf of: New Town and Broughton Community Council

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: Guidance for this should be in accordance with Scottish Government - whilst planning for a 'carbon-neutral' futureis important this could add costs to housing which is already undersupplied and too expensive for many inEdinburgh. This would have implications for the Council in trying to deliver the affordable housing that is hascommitted to.In terms of specifics for the many residents in the New Town and surrounding areas living in 19th century buildings– be they tenements or other - clearer guidance needs to be set out regarding permissible improvements to theirenergy and carbon performance, particularly for listed buildings, balancing the pressures to achieve a carbonneutralcity vs. the heritage impact. Striking the right balance between the benefits and harm is not alwaysstraightforward.This could include clearer guidance for the retrofitting of 'slimline' double glazing (or secondary glazing) , solarpanels or photovoltaics (PV) and could be extended to include other microgeneration systems if appropriate.

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Response Type: Community Council

On behalf of: New Town and Broughton 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: Yes

Explanation:

In principle, NTBCC very much welcomes the commitment to introduce Place Briefs into the wider planning process. There is an undoubted benefit in bridging the gap between the 2030 Plan and Planning Applications where currently there is something of a disconnect. In addition, the proper and effective involvement of local communities in contributing to Place Briefs that are of direct relevance to where they live and work is an important step forward. In particular, any move where people locally can contribute to the planning framework, as opposed to reacting to planning proposals, will confer considerable benefits, including we believe benefits for the Council. It is appreciated that it is not the purpose of the City Plan 2030 document that is out for consultation to detail how Place Briefs – and indeed other parts of the Plan – will work in practice, but it is important to recognise that the NTBCC would wish Place Briefs to meet certain requirements. 1. Place Briefs need to be developed in the first instance as a response to what local communities believe to be their particular needs and priorities. They should not be reactive responses to Council-led initiatives which steer or otherwise limit local choices. For similar reasons, Briefs should cover all Council functions and responsibilities. This could also include partnership arrangements e.g. Edinburgh Integration Joint Board for Health and Social Care as part of a whole systems approach. (The Consultation document aligns Place Briefs with setting "the targets for trips by walking, cycling and public transport based on current and planned transit interventions" and "greenfield sites", but we trust that this does not indicate that Place Briefs will be skewed to particular topics but be more open.) 2. Proper arrangements need to be put in place to engage local communities in discussions about what they wish to see for their area. (The Community Council has as part of its membership representatives from residents' associations that could provide building-blocks along with the Community Council for this, although not all neighbourhoods are presently covered by these bottom-up neighbourhood arrangements). Further consideration should also be given to the Council providing necessary additional funding for any publicity / events and facilitation to undertake this engagement. The Community Council can support the engagement as a key partner. 3. It is essential that engagement in Place Briefs be designed in innovative ways to make sure those who are excluded or marginalised in communities are engaged to get a proper community 'voice'. 4. The formal position of Place Briefs in the wider planning process, including constraints and limitations, should be precisely articulated so all communities understand in advance what influence they can exercise. 5. Place Briefs should be documents with a shared status between the Council and the relevant communities. Community Councils should have a part to play in this. 6. Individual communities and of course groups of communities will not have uniform views. The Place Brief process will need to be designed to deal with this and not, as presently happens on occasions, that the Council treats an absence of consensus as grounds for it to act as arbitrator, thereby taking responsibility and influence out of the hands of local communities. 7. Engagement in Place Briefs must extend beyond residents to include local businesses, churches/place of worship, voluntary associations and other bodies that form part of the community. 8. Where possible and appropriate, Place Briefs should specify what are to be community contributions to local areas, not just what falls to the Council, in a way that recognises that people locally can contribute to the four overriding aims of the City Plan 2030.

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Response Type: Community Council

On behalf of: New Town and Broughton Community Council

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   One fundamental consideration is how communities are configured for the purpose of Place Briefs. There is noabsolutely correct answer for this, but Briefs should relate to areas of such a size, geography and identity to allowfor effective local engagement and discussion and appropriateness for planning purposes, while obviously avoidingdifficulties of excessive fragmentation. Some criteria should be developed to assist with determining this.Community Councils should be involved in devising the criteria, while it would also be helpful to consider existingexamples that have already employed such a method to inform how best to configure 'Places' across the City.

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Supporting Info: Yes

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Response Type	Community Council
On behalf of:	New Town and Broughton Community Council

Email: chair@ntbcc.org.uk

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 No

Explanation Support the principle but the answer is more nuanced that a straight yes or no – so 'No' if that's the only option.

The issue of the impact of any development on infrastructure is a long-standing one for Edinburgh. Clearly, IF

adequate infrastructure capacity exists, then development in that location would have greater support than in an

area where there are strains on the existing infrastructure. However, given the underlying premise to the City Plan

2030 in terms of continued growth and projected population increases, it is unlikely that this can all be

accommodated in areas that are deemed as 'well-served' for infrastructure.

It is also worth considering – as laid out in the draft City Plan document – what infrastructure this should or does

refer to or put another way, what community infrastructure do homes and businesses need ?

1. Education Infrastructure

Clearly sufficient education capacity is necessary to support continued residential expansion. This is already a

required consideration in the planning process.

It is helpful that the Council has already carried out a high-level assessment of the new school infrastructure

which is likely to be required to support the housing need identified for City Plan. This summary shows, as we

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and other community councils have been saying for some time, that significant capacity is needed in north

Edinburgh – both for additional primary & secondary schools. Although historic planning applications have

frequently made a contribution to this – the Council does not appear to have looked at this either proactively,

holistically or consistently across Council departments to provide the necessary additional capacity –

rather, taking Broughton Primary as an example, has downsized the available estate (& then realised that

with the amount of new development, that additional facilities / capacity is required and then hurriedly

added capacity within the existing playground. What is needed is a longer-term vision and more forward

planning – using the Section 7⬚ contributions more effectively. We would hope therefore that the 'full

education infrastructure appraisal and strategy' will be more effective in supporting the City Plan ⬚0⬚0 than

the current LDP.

2. Healthcare Infrastructure

This again has been an historic issue – raised frequently in representations by ourselves and others for new

developments. We regularly hear concerns raised by residents about the difficulty in accessing necessary

healthcare facilities (with many either having waiting lists or not accepting new applications). The normal

response from planning officers is that they have little influence on additional provision. We would therefore

welcome the suggestion that the Edinburgh Health and Social Care Partnership will prepare a Primary

Healthcare Appraisal at some juncture, as part of preparing the Proposed Plan. This may help to ensure that

the process of planning future healthcare services considers changing & projected demands because of newdevelopment. However, it's unclear exactly how this will actually ensure that adequate health care provisionis available.3. Transport InfrastructureAgain it is mentioned that in preparing Choices for City Plan and the City Mobility Plan, the Council hascommissioned an Edinburgh Strategic Sustainable Transport Study (Phase 1). The study recommends fourtransport corridors within, and potentially beyond, Edinburgh suitable for the development of transit-ledsolutions (including Bus Rapid Transit (BRT) and Tram) to reduce carbon emissions, promote equality, supporthealthier lifestyles and deliver sustainable economic growth. These appear to be mainly driven by eitherprobable or possible tram extensions which may or may not be deliverable (due to possible changedeconomic circumstances) post Covid-19. Relevant to the city centre would be Key Area Corridor 3 & 6 butthese are only relevant for a small proportion of possible developments. In our view, the more relevantdiscussion concerns improvements in public transport across the city centre, through extension andrealignment of bus services. Although improvements to walking routes (& perhaps cycling routes) are alreadywell advanced, but we believe that the balance of expenditure should be more focussed on improvements towalking (as walking is unambiguously top of both the 'movement hierarchy' as laid down in Scottish PlanningPolicy (i) and the 'Sustainable Travel Hierarchy' in the new National Transport Strategy (2ii). However, whilstthe theoretical primacy of walking is often recognised, it is rarely put into practice and often, when there ismention, walking is often conflated with cycling.Furthermore, consistent with NTBCC's input to the City Mobility Plan consultation, there should be furtherconsideration of the use of suburban rail and light rail as viable options.The key aspect of all of the above is that identification of requirements must be cognisant of the views of localcommunities (including both residents and local businesses).Secondly, the Council already has many powers to demand contributions to infrastructure improvements, butoften, given the goal of pursuing continued economic growth along with pressure from developers on the impactof economic viability if levied, is often successful in reducing these contributions. Robust application of existingpowers is required.Finally, we would argue that the scope of necessary community infrastructure (as defined by communities) wouldbe much broader. The current pandemic has brought home to many the importance of including communityresources for people to gather and respond to emergencies in natural localities. There is no mention in the draftplan about essential 'Council- run' community infrastructure such as libraries, arts venues, access to Counciloffices, community centres or leisure centres even though these are all important to a greater or lesser extent for ahealth and wellbeing economy. This could be tackled by expanding the breadth / scope of Place Briefs both fornew housing developments but also for existing communities.

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Choice 5 B

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

Short Response Yes

Explanation Agree when there is a clear and easy provision for both accessible and sustainable public transport. This shouldalso include strong community input. Furthermore, it would be helpful to more fully define community facilities.The previous plan defined these as "facilities such as local doctor and dental surgeries, local shops, communityhalls and meeting rooms are necessary to foster community life". This seems entirely appropriate.Again there seems to be a focus on active travel routes but balance is needed between active travel andaccessibility.

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 Yes

Explanation Most people want to have local affordable community facilities, open at useful times, within their owncommunities - where it isn't feasible to locate specific services in each community, to ensure easy accessphysically, by public transport and opening hours (and perhaps access virtually on-line).

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Choice   5   D1

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

Short Response	Yes
Explanation	Yes, in principle but again the premise of the question isn't entirely clear.Clear support from the community that developers should be responsible for funding improvements necessary tomitigate any negative consequences of their proposed development. It could also be seen beneficial for thedeveloper to provide additional funding for new or expanded infrastructure but this requires precise definition aswell as robust application of the policy.

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Choice **5 D2**

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

Short Response Yes

Explanation Yes, in principle

If the proposal is to continue with the process outlined in the August 201? 'Developer Contributions &

Infrastructure Delivery' Supplementary Guidance document such that if it is identified that their cumulative

impacts i.e. arising from more than one development, a contribution zone is established, then given that this

Supplementary Guidance is very recent – we can see no reason to change it without further review based on experience. It is clear that there may well be examples where the total cost of delivering necessary infrastructure

improvements in a wider area would fall disproportionally on one development then sharing these costs

proportionally and fairly between all developments which fall within that area seems appropriate. This has the

added benefit of negating some of the arguments regarding the economic viability of a particular scheme. That

said – the onus on the council is to then agglomerate and manage these contributions appropriately and deliver

the paid-for infrastructure improvements (which hasn't always been the case e.g. the infamous bridge from

Greenside Row / Place to Calton Hill that remains an unsolved enigma).

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Choice 5 E

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

Short Response Not Answered

Explanation We do not fully understand the distinction being referred to hereIf, as we understand it, replacing supplementary guidance with guidance contained within the plan (and in nonstatutoryguidance?) i.e. not a separate process, strengthens the likelihood of achieving satisfactory infrastructureimprovements (as intended) then this would be welcomed.We would also assume that this may require robust defence at planning appeals as well as being rigorouslyenforced.

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Choice **6 A**

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

Short Response Yes

Explanation Yes – subject to the conditions explained below

By simply focussing on the need to reduce the usage of cars rather than all vehicles, the proposed Plan will not be

able to fully meet its stated goal to create "places for people". As well as cars, the traffic in Edinburgh is made up

of a large number of commercial vehicles servicing the local businesses and residential properties as well as public

service vehicles including buses, tourist coaches and taxis. These vehicles add considerably to the congestion in the

City especially the city centre and to the levels of atmospheric emissions resulting in unacceptable levels of

pollution. The LDP should support the Council's plans for reducing atmospheric emissions and in particular the City

Centre and City-Wide Low Emission Zones (LEZ). It is essential that the LEZ proposals should be more ambitious

and extend Euro 5 levels of protection beyond the central business and tourism district. The expected increase in

working from home following the pandemic will now make this approach much easier to achieve. This is an

opportunity that should not be missed.

The NTBCC objected to the Council's LEZ proposal (July 2019) asking that the proposed "central" zone be widened

to include Queens Street, York Place, London Road and Regent Road, as they would otherwise become an

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"alternate route" for non-compliant traffic, which can only increase pollution in residential areas adjacent to the city centre. We ask again that these streets be included in the central LEZ zone.The Council should also use its leverage with Lothian Buses, and other operators, to ensure that all fleets operating in the Edinburgh city region meet Euro 6 standards as soon as possible. In redesigning bus routes, careful consideration should be given to the air and noise pollution, and potential structural damage, caused by routing a disproportionate number of bus journeys through any one residential street. The Council should work with Lothian Buses to ensure that city residents are not exposed to an excessive level of hazard. Similarly the Council should work with the providers of tourist coaches to ensure that they conform to the best environmental standards and that their use within the city centre is reduced. Whenever possible, tourists should be accessing the city centre on foot.The use of electric vehicles should be encouraged especially within the city centre area. As well as providing increased charging infrastructure to allow residents to convert to electric vehicles, the Council should use its licencing powers to require electric taxis and delivery vehicles in the City.While we support Active Travel that promotes healthy communities we believe that any travel strategy must take account of the needs of residents and visitors with limited mobility. Otherwise the proposed hierarchy of travel options that prioritises walking and cycling may disadvantage disabled people, their unpaid carers and paid support staff. We are also concerned that public transport is not sufficiently accessible at present, let alone for a growing older population. It is important that any transportation hubs are accessible by all users.

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Choice   6   B

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

Short Response Yes

Explanation Yes – subject to the conditions explained belowIt is appropriate that the Local Development Plan (LDP) does set targets for the use of different modes of transportexpected as a result of any development included in the LDP and that this takes account of the current andplanned level of public transport that may be available. Also Place Briefs should be required to demonstrate thesteps that are being taken to reduce the total amount of travel that is required through co-location of residential,commercial, educational, and other community facilities to minimise the need to travel by means other than activetravel.Also any development not capable of meeting set criteria established in the LDP for the use of current and plannedpublic transport or active travel should not be permitted. Large housing, commercial or industrial developmentthat is not located close to existing or planned public transport should not be permitted under the LDP in orderthat the stated goal of reducing car usage is achieved.It is not clear how the targets included in the Briefs will be used to determine the appropriate levels of parkingrequired to support the high use of public transport. Given the goals to reduce car usage in the city, it is consideredthat before finalising the LDP the Council should establish the current availability and usage of off-street and onstreetcar parking spaces particularly in the city centre. This would allow the Council to determine whether theexisting levels are adequate or otherwise and thus establish policies for future off-street parking consistent withthe Council's overall development and environmental aims. In particular, the Council should rescind its ParkingAction Plan (voted through the month before lockdown) which will expand private car-parking capacity for visitorsin central Edinburgh to its highest-ever levels and, in conjunction with the 1600 spaces already approved in thenew St James' Centre, would inevitably increase the volume of private car traffic in the residential centre. This runscompletely counter to the Council's proclaimed aims.

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   Yes

Explanation   Yes – subject to the conditions explained belowWe agree that the current "one size fits all" approach is flawed and that a more nuanced approach is required. Thelocation of the development and its proximity to existing or planned public transport will impact on the perceivedneed to use private vehicles and thus provide parking. Just reducing the number of parking spaces in adevelopment without addressing the demand for such places will only add to the pressure on-street parkingprovision.Edinburgh is unusual in terms of the number of people living within the city centre. Although most residents arenot car owners, there are many that do require a personal car due to reduced mobility, family responsibilities orwork. It is important that the Plan recognises the need for continued allocation of space for residents' parking.

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   No

Explanation   No – for the reasons explained belowIt is noted that there is no intention to update TRA 5 City Centre Public Parking. This is surely an oversight as thispolicy currently only limits such development on grounds of adverse impact on the historic environment. There isnothing in the current policy to address the impact of any such additional parking on congestion or on publictransport or active travel routes. Also, we support the introduction of a parking levy on employers and retailers inthe City Centre to fund improvements in the public transport provision.

Customer Ref:	00301	Response Ref:	BHLF-KU2U-GPFV-T	Supporting Info	Yes

Name	Carol Nimmo			Email	chair@ntbcc.org.uk

Response Type Community Council

On behalf of: New Town and Broughton 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 Yes

Explanation Yes – subject to the conditions explained belowWe support the intent to reduce the demand for parking spaces and encourage the use of cycles and electricvehicles not only associated with new developments but as part of the Council's aims to transform the city centreand reduce atmospheric emissions from vehicles and thus pollution. Any developments should make provision forboth current (active) and future (projected) demand for electric vehicle charging infrastructure either on-site or asa contribution to a public charging infrastructure. The Choices document should include a clear intent (with aspecific target) to increase the usage of electric vehicles among residents and local businesses. We would supportchanges to the charges for residential parking permits to encourage residents to switch to electric vehicles and useany additional revenues created to fund the acceleration of the roll-out of charging infrastructure across the City.

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 Yes

Explanation Yes – subject to the conditions explained belowWe support the further development of well-connected park and ride sites to reduce the need for cars to betravelling into the City Centre and to other areas in which commercial and retail businesses are located as part ofplans to reduce the number of car journeys within the City. We believe that protection should also be provided inthe LDP for redundant rail infrastructure in line with Scottish Planning Policy (paragraph 277) that states that"disused railway lines with a reasonable prospect of being reused as rail, tram, bus rapid transit or active travelroutes should be safeguarded in development plans". The use of these disused railway lines in conjunction witheither brownfield or greenfield housing development may mitigate the impact of such developments on roadtraffic volumes.Currently there appears to be an over-emphasis on their use as active travel routes that do not recognise theirpotential value for other transport modes.

| Customer Ref: | 00301 | Response Ref: | BHLF-KU2U-GPFV-T | Supporting Info | Yes |

Customer Ref: 00301

Response Ref: BHLF-KU2U-GPFV-T

Supporting Info Yes

Name Carol Nimmo

Email chair@ntbcc.org.uk

Response Type Community Council

On behalf of: New Town and Broughton Community Council

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

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

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 Not entirelyCommenting on 8B, before committing to their use for active travel it is important as noted above that there is anassessment of their potential use for other forms of transport.

Customer Ref:	00301	Response Ref:	BHLF-KU2U-GPFV-T	Supporting Info	Yes

Name Carol Nimmo

Email chair@ntbcc.org.uk

Response Type Community Council

On behalf of: New Town and Broughton Community Council

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:	00301	Response Ref:	BHLF-KU2U-GPFV-T		Supporting Info	Yes

Name: Carol Nimmo

Email: chair@ntbcc.org.uk

Response Type: Community Council

On behalf of: New Town and Broughton 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: Yes

Explanation:

The rise of and negative effects of unlawful short term lets on Edinburgh and its resident population has been

widely recognised. We do not believe that there would be any value in designating any single community, or parts

of Edinburgh as short term let control areas, as it will only move this activity in other areas, negatively affecting

those local communities disproportionately. If we have learned nothing else from this pandemic, it is the

importance of having residents for strong and cohesive communities, across Edinburgh. We would advocate for all

of Edinburgh to be a single short term let control area, with the same criteria to judge suitability for any change of

use or for residents who want to short term let their own property in full, or in part.

What may be more useful is a consultation for the residents of Edinburgh on what the licensing and enforcement

of short term letting should be. PLACE Edinburgh has put forward a licensing proposal, which could be used as a

basis for a consultation, as it has been generated from existing case law, learning from licensing used elsewhere in

the world, and the lived expertise of Edinburgh residents who have experienced living next to short term lets

across the city. The proposal has been refined from feedback received online and through face to face meetings

with communities in Edinburgh. (1)

(1)13

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?

Explain why:

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?

Explain why:

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?

Not entirely

Explain why:

Commenting on 8B, before committing to their use for active travel it is important as noted above that there is an

assessment of their potential use for other forms of transport.

Customer Ref:	00301	Response Ref:	BHLF-KU2U-GPFV-T	Supporting Info	Yes
Name	Carol Nimmo			Email	chair@ntbcc.org.uk
Response Type	Community Council				
On behalf of:	New Town and Broughton Community Council				

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

▢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

Explain why ?

The rise of and negative effects of unlawful short term lets on Edinburgh and its resident population has been

widely recognised. We do not believe that there would be any value in designating any single community, or parts

of Edinburgh as short term let control areas, as it will only move this activity in other areas, negatively affecting

those local communities disproportionately. If we have learned nothing else from this pandemic, it is the

importance of having residents for strong and cohesive communities, across Edinburgh. We would advocate for all

of Edinburgh to be a single short term let control area, with the same criteria to judge suitability for any change of

use or for residents who want to short term let their own property in full, or in part.

What may be more useful is a consultation for the residents of Edinburgh on what the licensing and enforcement

of short term letting should be. PLACE Edinburgh has put forward a licensing proposal, which could be used as a

basis for a consultation, as it has been generated from existing case law, learning from licensing used elsewhere in

the world, and the lived expertise of Edinburgh residents who have experienced living next to short term lets

Customer Ref:	00301	**Response Ref:**	BHLF-KU2U-GPFV-T	**Supporting Info**	Yes
Name	Carol Nimmo			**Email**	chair@ntbcc.org.uk
Response Type	Community Council				
On behalf of:	New Town and Broughton Community Council				

across the city. The proposal has been refined from feedback received online and through face to face meetings

with communities in Edinburgh. 1

1 PLACE Edi⯑b⯑⯑gh⯑⯑ ⯑⯑⯑⯑⯑⯑al f⯑⯑ lice⯑⯑i⯑g

https://docs.google.com/document/d/1P4GN1wHYgcElqxWZjyfMq02haxM4aWJhKUG3sZ5jMKE/edit

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 | Yes

Explanation | There should always be a presumption against a Change of Use from residential property to commercial use asEdinburgh has a growing population, with a homelessness issue. The cost of owning or renting a home hasincreased higher than income and may affect the ability for younger people to remain within their communities ifthey wish to leave the family home, and for a healthy diversity within communities. We support the Make the Shiftcampaign to recognise housing as a human right. 2The loss of certain local retail, commercial and community facilities can have a very detrimental impact on thecommunities that they are intended to serve. We have seen in the city centre the loss of many businesses thathave provided essential services and employment to local residents as many have been converted into touristfocussedenterprises. If the city centre is to remain a place that people want to live in a sustainable manner it isimportant that the LDP provides protection against uncontrolled change of use of such local businesses.

Customer Ref:	00301	Response Ref:	BHLF-KU2U-GPFV-T	Supporting Info	Yes

Name: Carol Nimmo

Email: chair@ntbcc.org.uk

Response Type: Community Council

On behalf of: New Town and Broughton Community Council

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: Yes

Explanation: At the moment purpose-built student housing is being built at an unprecedented speed and scale. These have the potential to overwhelm local communities and infrastructure. They are not always built within a 15/20 minute walk of any educational institution which increases the need for additional travel between student residences and educational institutions.

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

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: Yes

Explanation: We support the plans locate housing and community facilities adjacent to such developments to minimise travel needs and strengthen the financial viability of existing out of centre retail and commercial units, especially where there units are well located near existing or planned public transport routes.

Customer Ref:	00301	Response Ref:	BHLF-KU2U-GPFV-T	Supporting Info	Yes

Name Carol Nimmo

Email chair@ntbcc.org.uk

Response Type Community Council

On behalf of: New Town and Broughton Community Council

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

Not fully

Although we would generally support an increase in provision of affordable housing and understanding that the

current policy (at 25%) has been in place for many years, it is clear that this question cannot be answered without

being aware of possible negative consequences – in terms of impacting the level of new housing builds. It is also a

significant increase above the current 'requirement'. We are also not aware of any analysis of the effect of this

proposed increase and whether this would actually increase the supply of truly affordable housing.

We believe that an alternative approach is to focus on ensuring that, firstly, the 25% affordable housing

requirement is delivered (see example below) and secondly, and more importantly, that this 'affordable' housing is

actually affordable. It has been stated that there is particular demand for social rented housing in Edinburgh – with

Social rented homes accounting for only 14% of the housing stock in Edinburgh, compared to the Scottish average

of 23%. Hence, we believe that the focus should primarily be on an improved definition of affordable housing.

Therefore, we believe that the definition of affordable housing should reflect the average wage or the Living Wage

rather than a figure that relates to surrounding properties; otherwise it is likely that some neighbourhoods will

never be affordable to a large section of the community either as home owners or renters. This is particularly

important for young people leaving the family home who wish to remain in the community that can best support

them through established networks.

There must also be follow through on promised affordable housing, with enforcement action taken if necessary . A

prime example of where this has not happened can be seen with Kingsford Developments that promoted the 73

property development in McDonald Road before the planning application was agreed as 'The Urban Key concept is

unique and provides a new form of accommodation to address affordability issue for city and key workers.'3

However, after planning permission the development is now advertised as luxury long term lets4 and holiday lets.5

As PLACE Edinburgh highlights in its submission6 on this question house prices have been inflated by a shortage in

available housing stock due to the rapid proliferation of properties being used exclusively for holiday lets, with no

resident living there, which affects what is considered affordable if prices are related to the market value.

3 Planning Statement on behalf of Kingsford Developments

https://www.broughtonspurtle.org.uk/sites/default/files/story/13_02458_FUL-REPORT-1616161.pdf

4 Kingsford Residence webpage https://www.kingsfordresidence.com/

5 Tripadvisor webpage for Kingsford Residence https://www.tripadvisor.co.uk/Hotel_Review-g186525-

d14767056-Reviews-Kingsford_Residence-Edinburgh_Scotland.html

6 PLACE Edi🔲b🔲🔲gh🔲🔲 🔲🔲b🔲i🔲🔲i🔲🔲 🔲🔲 Ci🔲🔲 Pla🔲 🔲🔲🔲🔲

Customer Ref:	00301	Response Ref:	BHLF-KU2U-GPFV-T	Supporting Info	Yes

Name Carol Nimmo

Email chair@ntbcc.org.uk

Response Type Community Council

On behalf of: New Town and Broughton Community Council

https://docs.google.com/document/d/1cU8Yqu0x53xsET6409OaI4PaGWcL-U37JdsNt6Mo2So/edit

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 Yes

Explanation A mix of housing types and tenures creates diverse communities and avoids ghettos. New housing developmentsagreed must also be responsive to address where there are gaps in provision e.g. accessible housing or singleoccupant housing. New housing must be adaptable for a range of occupants and to enable people to live in theirown homes for as long as possible, regardless of how their physical health may change. This pandemic has shownthe importance of social connections and supports and why it is important that residents should not be forced tomove away from established social connections and supports just because their home is not adaptable enough asthey go through their Life Course.7The majority of Edinburgh's housing stock is made up of flatted properties. As one in five people in Scotland aredisabled and in order for them to live in suitable homes, and to be able to socialise with non-disabled people intheir homes, many more accessible homes need to be built. New standards for accessible housing are beingconsidered by the Scottish Government, and Edinburgh Council should be aiming to meet not just existingstandards and quotas, but achieve higher quality standards and quotas to futureproof housing stock andcompensate for the gaping hole in existing provision. We are an ageing population who are going to need moreadaptable and accessible housing in the future than we do now.Currently, disabled people can be excluded from social events in Edinburgh homes and bars / pubs / restaurants asthese locations are not accessible to them. This is not good for the mental health of the disabled person or theirfriends who are forced to exclude them as building standards have not kept pace with Human Rights. The crisis inaccessible housing in Scotland is already recognised by the Equality and Human Rights Commission. 8Large developments of homes cannot be allowed to build segregated or gated communities on the same site. Theyshould not be able to move the affordable or social housing provision offsite, as has been done with the St JamesCentre development or segregation and ghettoisation will be encouraged, reducing diversity.As noted previously, it is important that the LDP provides protection not just for a range of housing but also therange of businesses and services required to support a healthy sustainable community.7 Public Health, UK Government https://publichealthmatters.blog.gov.uk/2019/05/23/health-mattersprevention-a-life-course-approach/8 https://www.equalityhumanrights.com/en/publication-download/housing-and-disabled-peoplescotlands-hidden-crisis

| Customer Ref: | 00301 | Response Ref: | BHLF-KU2U-GPFV-T | Supporting Info | Yes |

Customer Ref: 00301   **Response Ref:** BHLF-KU2U-GPFV-T   **Supporting Info** Yes

Name Carol Nimmo   **Email** chair@ntbcc.org.uk

Response Type Community Council

On behalf of: New Town and Broughton Community Council

Choice **12 A**

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

Short Response Option 3 (Blended

Explanation With reference to Choice 2B above, any development site for housing within the city centre boundary would beclassed as brownfield.Redeveloping the urban area can regenerate areas, maintain local services, remove local eyesores and bring landand buildings back into effective use – but a balance must be struck.NTBCC are concerned at the potential loss of land which currently houses the light industry and services whichfacilitates the daily 'management' of a busy city centre and its residents. Trade services, traditional crafts, garagesetc are often located in small industrial units within the city centre boundary. On land that is regarded asbrownfield. This land is valuable, and easily seen as the 'perfect' solution to a housing shortage, but the hiddencosts can be enormous to the city. The displacement of light industry and services to the city edges would addtransport miles, pollution and time spent, contrary to the challenge faced in meeting climate change targets.For this reason NTBCC would support Option 3 A Blended ApproachHowever, NTBCC do not support the use of Compulsory Purchase Orders as a means of delivering the plan - whichremoves public consensus and communities from the process.

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

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

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:	00301	**Response Ref:**	BHLF-KU2U-GPFV-T	**Supporting Info**	Yes
Name	Carol Nimmo			**Email**	chair@ntbcc.org.uk
Response Type	Community Council				
On behalf of:	New Town and Broughton 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:	00301	Response Ref:	BHLF-KU2U-GPFV-T	Supporting Info	Yes

Customer Ref: 00301   **Response Ref:** BHLF-KU2U-GPFV-T   **Supporting Info** Yes

Name Carol Nimmo   **Email** chair@ntbcc.org.uk

Response Type Community Council

On behalf of: New Town and Broughton 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

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:	00301	Response Ref:	BHLF-KU2U-GPFV-T	Supporting Info	Yes

Name: Carol Nimmo

Email: chair@ntbcc.org.uk

Response Type: Community Council

On behalf of: New Town and Broughton 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

Customer Ref:	00301	Response Ref:	BHLF-KU2U-GPFV-T	Supporting Info	Yes

Name: Carol Nimmo

Email: chair@ntbcc.org.uk

Response Type: Community Council

On behalf of: New Town and Broughton Community Council

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: No

Explanation:
We question whether a policy which supports increasing tourism in a city already suffering from over tourism ishelpful in creating a balanced economy or is sustainable given the increasing negative impacts of over tourism.A policy which supports social enterprises, start-ups, culture, innovation, learning and the low carbon sector iswelcome.Edinburgh is celebrated as being home to the world's biggest arts festival, while this to many is an accolade it isvital that there is consistent and considered support for the city's indigenous activities and creativity. It mustprovide a healthy and receptive ground for visiting cultural activities and visitors but importantly must not losesight of its all-important residents and those who work in the city.Edinburgh needs to continue to be hospitable and welcoming to all but not to the detriment of its own residentsand cultural activities. Arguably audiences – both indigenous and visiting - are becoming increasingly morediscerning – there is huge cultural competition not just within the UK but also globally - and the City Plan likewiseneeds to support quality over quantity. 'Good growth' must attract start-ups, individuals and businesses to live andwork in Edinburgh – and retain those already living and working here - who give long-term nourishment to the city.Edinburgh must continue to be a 'lived-in' city and not just a 'a hall for hire.'The City Plan needs to support a mixed ecology that embraces innovation and learning, supports social enterpriseand addresses thoroughly the climate crisis. The City Plan needs to be sophisticated and have the confidence thatexpected of a capital city to be innovative and forward-thinking in and of itself.

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

| Customer Ref: | 00301 | Response Ref: | BHLF-KU2U-GPFV-T | Supporting Info | Yes |

Customer Ref: 00301   Response Ref: BHLF-KU2U-GPFV-T   Supporting Info: Yes

Name: Carol Nimmo   Email: chair@ntbcc.org.uk

Response Type: Community Council

On behalf of: New Town and Broughton Community Council

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

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

Customer Ref:	00301	Response Ref:	BHLF-KU2U-GPFV-T	Supporting Info	Yes

Name: Carol Nimmo

Email: chair@ntbcc.org.uk

Response Type: Community Council

On behalf of: New Town and Broughton 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: Yes

Explanation: NTBCC support this view, however we are concerned that the City Centre, while regarded as 'healthy' by manymarkers is being undervalued in this report, and that its status is more fragile than presented.We are surprised that there is no mention of the specific policies which apply to the city centre with regard to itsstatus as a World Heritage Site and as a Conservation Area and the responsibilities therein.The city centre is the beating heart of Edinburgh and unique in being 'lived in', with a large residential population.It is vital that all decisions regarding this core area take cognisance of the impact on and for residents, to ensurethey enhance rather than detract from daily life in this thriving city centre.

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

Customer Ref:	00301	Response Ref:	BHLF-KU2U-GPFV-T		Supporting Info	Yes
Name	Carol Nimmo			Email	chair@ntbcc.org.uk	
Response Type	Community Council					
On behalf of:	New Town and Broughton Community Council					

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

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

Customer Ref:	00301	Response Ref:	BHLF-KU2U-GPFV-T	Supporting Info	Yes

Name Carol Nimmo

Email chair@ntbcc.org.uk

Response Type Community Council

On behalf of: New Town and Broughton Community Council

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 No

Explanation Tourism industry leaders have admitted there is an over-supply in hotel rooms. They state this is already having a"negative impact" on occupancy levels and room rates, even before a string of proposed new developments acrossthe city are either completed or come up for planning permission.9In a city with limited development space, there should be a need to demonstrate a robust case for additional hotelbeds.9https://www.edinburghnews.scotsman.com/arts-and-culture/edinburgh-festivals/edinburgh-builds-too-many-hotel-rooms-touristsafter-

numbers-soar-50-1995436

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

Customer Ref:	00301	Response Ref:	BHLF-KU2U-GPFV-T	Supporting Info	Yes

Name   Carol Nimmo

Email   chair@ntbcc.org.uk

Response Type   Community Council

On behalf of: New Town and Broughton 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   Yes

Explanation   We support a sustainable mix of employment within our area and across the city, and support steps that reducedistances people have to travel to work. Therefore we would support the continued use of strategic officelocations as it would affect us in the city centre. We would support this again on the basis of having a mix ofactivities in the location.

Choice   **16   A2**

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

Short Response   Yes

Explanation   We support this on the basis that a commercial centre adjacent to office space provides the possibility of nearbyleisure and refreshment activities for office workers and the ability to use spare time and lunch breaks to makepurchases. It also provides a ready supply of potential clients nearby to the commercial development.

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 Yes

Explanation Yes, albeit with reservations about the use of the term "significant".Edinburgh is unique in having a strongly residential city centre and benefits from residents keeping the city centrealive outside of commercial and office activity times. We would agree with the proposal to provide significantoffice space in as much as we want office space that is available to provide work for local residents and reduce thetimes they may have to set aside for commuting and the impact on the local environment.

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

Customer Ref: 00301   Response Ref: BHLF-KU2U-GPFV-T   Supporting Info: Yes

Name: Carol Nimmo   Email: chair@ntbcc.org.uk

Response Type: Community Council

On behalf of: New Town and Broughton Community Council

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: Yes

Explanation: We support the idea of office development in our area particularly focused on addressing the needs of residents.There is an increasing trend towards work portfolio careers and working from home (which has been accentuatedby the Covid-19 pandemic) and we would support the development of office space on a short term lease basis andfor small companies and single individuals as a way to encourage entrepreneurship within Edinburgh, in line withgovernment policies in relation to developing Fintech for example. We would encourage the Council to work withagencies such as Fintech Scotland and Scottish Enterprise to develop this to provide an alternative to commercialventures such as Regus and WeWork, where prices can sometimes be prohibitive. Within this framework we wouldsupport the development of incubators for specialist industries such as investment management, to encourage awider diversification of business within the city, and we would encourage the larger firms to engage in steps thatmight bring this to fruition.

Choice   16   A5

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

Short Response:

Explanation

| Customer Ref: | 00301 | Response Ref: | BHLF-KU2U-GPFV-T | Supporting Info | Yes |

Name: Carol Nimmo

Email: chair@ntbcc.org.uk

Response Type: Community Council

On behalf of: New Town and Broughton 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: Yes

Explanation: Yes, in line with our previous comments.

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: YesWe feel strongly that Edinburgh city centre has been unsustainably weighted to tourist and commercialdevelopment in recent years, and in order to maintain a mix of local employment opportunities we wouldencourage the maintenance of existing office space.

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:	00301	Response Ref:	BHLF-KU2U-GPFV-T		Supporting Info	Yes
Name	Carol Nimmo			Email	chair@ntbcc.org.uk
Response Type	Community Council
On behalf of:	New Town and Broughton 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

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:	00301	Response Ref:	BHLF-KU2U-GPFV-T	Supporting Info	Yes

Name: Carol Nimmo

Email: chair@ntbcc.org.uk

Response Type: Community Council

On behalf of: New Town and Broughton 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

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

Customer Ref:	00301	**Response Ref:**	BHLF-KU2U-GPFV-T

Supporting Info Yes

Name Carol Nimmo

Email chair@ntbcc.org.uk

Response Type Community Council

On behalf of: New Town and Broughton 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 Yes

Explanation A continued mix of employment in the locality as offered by industrial estates is essential for bringing a diversity of roles and people into our community. Further, we would welcome the provision of industrial space that could cater for high-end businesses that could be an essential part of an entrepreneurial plan for our city.

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 Yes

Explanation We would envisage the criteria be used to design a system that minimises the amount of heavy goods vehicles coming into the city centre, and would welcome a framework that encourages more sustainable local distribution.

New Town & Broughton Community Council Response
"Choices for City Plan 2030"

5th May 2020

For attention of the City Plan Team via cityplan2030@edinburgh.gov.uk

Please find below a text copy of the New Town & Broughton Community Council (NTBCC) response to 'Choices for City Plan 2030', as submitted via the online portal on 30th April 2020.

In responding to the consultation we have tried to answer the questions from the perspective of the community we represent but the key question that remains is whether these are the correct questions in the current circumstances. However, we would emphasise that the pandemic does not invalidate our comments to the questions as consulted on.

We recognise that this process is driven by statute and was commenced many months before the Covid-19 pandemic was declared let alone began to impact directly on Edinburgh and the rest of Scotland. Given the impact that the pandemic will have on the economy of Edinburgh and Scotland for many years to come, the assumptions that were used to generate the Choices document are unlikely to be still valid. In particular, the assumptions about economic activity, population growth, housing demand and tourism all need to be re-examined. Also, given the current uncertainty it would appear sensible to delay the remaining steps in the preparation of a new Local Development Plan until the future impact of the pandemic is clearer. There was already a mismatch between the Council's environmental and economic goals, which has been exacerbated by the pandemic; and the pace and priorities for change will inevitably be altered.

NTBCC would request therefore that Edinburgh Council (with the expected agreement of the Scottish Government) should engage further with the various stakeholders with the Plan at an appropriate point in the future once it has been possible to recalibrate the assumptions and choices to enable a more meaningful Local Development Plan to be produced.

In these difficult times, and in the days, weeks and months to come Edinburgh has an opportunity to reflect on the questions raised by 'Choices', to refocus priorities to fit the new future and develop a plan that will be truly relevant.

Yours sincerely

Carol Nimmo

Chair, New Town & Broughton Community Council (chair@ntbcc.org.uk)

New Town & Broughton Community Council Response
"Choices for City Plan 2030"

Consultation Sections

1. Choice 1 - Making Edinburgh a sustainable, active and connected city
2. Choice 2 - Improving the quality, density and accessibility of development
3. Choice 3 - Delivering carbon neutral buildings
4. Choice 4 - Creating Place Briefs and supporting the use of Local Place Plans
5. Choice 5 - Delivering Community Infrastructure
6. Choice 6 - Creating places that focus on people, not cars
7. Choice 7 - Supporting the reduction in car use in Edinburgh
8. Choice 8 - Delivering new walking and cycling routes
9. Choice 9 - Protecting against the loss of Edinburgh's homes to other uses
10. Choice 10 - Ensuring the better use of land
11. Choice 11 - Delivering more affordable homes
12. Choice 12 - Building our new homes and infrastructure
13. Choice 13 - Supporting inclusive growth, innovation, universities, & culture
14. Choice 14 - Delivering West Edinburgh   N/A
15. Choice 15 - Protecting our City Centre, Town and Local Centres
16. Choice 16 - Delivering Office, Business and Industry Floorspace
17. Equalities and Rights
18. Technical Changes / EIA

New Town & Broughton Community Council Response

"Choices for City Plan 2030"

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?

Only in part or No (if Yes / No the only option)

Explain why:

What does this actually mean? The first part of the question could quite easily be seen as a 'motherhood-statement' – being a vague, "feel good" platitude, that few people would disagree with but it's lacking in detail and unclear precisely what it would actually achieve.

However, would it be sensible that new developments are encouraged to connect locally with greenspaces that contribute to the overall amenity of that development & the health and well-being of its residents? Then of course, yes.

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?

In part or No (if Yes / No the only option)

Explain why:

Despite agreeing in principle with increasing many of the specifics of green and blue infrastructure, as described - this is a very prescriptive.

We agree and support the need, as part of a health and wellbeing economy, to prioritise green / blue infrastructure where appropriate (as stated, this could include trees, living roofs, and nature-based drainage solutions (e.g. permeable parking areas) as well as making best use of natural features in the surrounding environment). However, including this as a non-negotiable blanket requirement (including change of use) seems too prescriptive. If there was a presumption for inclusion unless clear reasons were advanced not to include – then perhaps more workable?

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, subject to the comments below

Explain why:

However, difficult to think of locations in the city centre besides East Princes Street Gardens!

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?

Only in part or No (if Yes / No the only option)

Explain why:

There should be a strong presumption of <u>no</u> development on existing open space in the city centre. Rather than just consider circumstances under which development would be considered acceptable, consideration should be also be given to demonstrating why the poor quality open space cannot be improved. Similarly for open spaces that are under-used – understanding the reason behind the lack of use should be explored fully as well as the metrics to define 'under-use'.

New Town & Broughton Community Council Response

"Choices for City Plan 2030"

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?

No

Explain why:

The current policy, Env 20, (which applies to new developments only) states " The Council will negotiate the provision of new publicly accessible and useable open space in new development when appropriate and justified by the scale of development proposed and the needs it will give rise to. In particular, the Council will seek the provision of extensions and/or improvements to the green network."

Although subjective and perhaps in need of strengthening, Env 20 does contain sensible conditions. Changing this requirement to an 'Extra large green space standard' (being 5 hectares) seems a very large increase in area and there are concerns that, given the stated need to provide more housing, having such a large space standard could result in more land being needed for development which may be, in part, in the green belt, and / or reduce the land available for housing so regard this as too onerous.

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:

As well as being a Scottish Government duty ("Guidance as contained in sections of Part 9 of the Community Empowerment (Scotland) Act 2015"), evidence from current allotment waiting lists clearly support the need to provide more space for allotments, whether that be for food growing or the more general need for 'open space'. Provision of community gardens as part of large, new developments instead of (or perhaps as well as) small private gardens is worthy of further consideration. Identifying further potential sites for additional allotments within the urban area is also supported as an aspiration but this is an either / or choice (as land is a precious commodity).

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

Explain why:

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. The Council favours factoring on behalf of the private landowner(s) but will consider adoption should sufficient maintenance resources be made available. Do you agree with this?

Yes

Explain why:

It is clear that longer term maintenance of green spaces is important as it is both the extent and the quality of the space that is important. Too often, and there are many examples, new 'green' spaces suffer from lack of ongoing maintenance and degrade over time – resulting in decreasing usage. We are aware of limited powers currently available – normally through conditions attached to approval of planning applications, to ensure ongoing maintenance for a number of years. There are also several successful private factoring arrangements for the management of communal open space e.g. Powderhall village and would seem preferable to the alternative of adoption by the Council (and the resultant longer term cost pressures).

Longer term maintenance and management processes should also be in place for public greenspaces especially 'Common Good Land', currently under the care of the Council.

New Town & Broughton Community Council Response
"Choices for City Plan 2030"

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.

Do you agree with this?

Yes

Explain why:

NTBCC fully support the proposal that all development will incorporate design measures in regard to future adaptability. It is important that new building in the city centre, from high value apartments, student flats, hotels and industrial units, are designed to be adaptable to possible change of use, that development is future-proofed. For instance, student flat builds should have floor plans which allow for flexibility as to apartment size, be it for studio rooms, family apartments or hotel suites.

It is also essential in the city centre that future development enhances accessibility and adaptability for those with varying needs. An inherent part of Edinburgh's city centre is its residential nature, and new development must ensure that all future residents can enjoy access both to their homes and to the city.

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:

By default, new development in the city centre will be a redevelopment of an urban area, a brownfield site. With the very limited and sensitive brownfield sites potentially available in the city centre, NTBCC **do support** densification of new build where appropriate. Most of the city centre residential supply is historically 'vertical' so this design model should continue to apply. The value of these assets must not be wasted by under-development.

However, of upmost priority must be that future development is of the highest quality of design and built to the best standard. Densification should not mean small and smaller living spaces, which has become the norm in contemporary apartment design within the city.

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?

Explain why:

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 (but with the exception of the reference to drying space)

Explain why:

All new development should deliver opportunities for people to enjoy a high quality of life within an attractive and safe environment which encompasses natural open landscapes.

New Town & Broughton Community Council Response

"Choices for City Plan 2030"

Choice 3 - Delivering carbon neutral buildings

3A 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?

Explain why:

Guidance for this should be in accordance with Scottish Government - whilst planning for a 'carbon-neutral' future is important this could add costs to housing which is already undersupplied and too expensive for many in Edinburgh. This would have implications for the Council in trying to deliver the affordable housing that is has committed to.

In terms of specifics for the many residents in the New Town and surrounding areas living in 19th century buildings – be they tenements or other - clearer guidance needs to be set out regarding permissible improvements to their energy and carbon performance, particularly for listed buildings, balancing the pressures to achieve a carbon-neutral city vs. the heritage impact. Striking the right balance between the benefits and harm is not always straightforward.

This could include clearer guidance for the retrofitting of 'slimline' double glazing (or secondary glazing) , solar panels or photovoltaics (PV) and could be extended to include other microgeneration systems if appropriate.

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:

In principle, NTBCC very much welcomes the commitment to introduce Place Briefs into the wider planning process. There is an undoubted benefit in bridging the gap between the 2030 Plan and Planning Applications where currently there is something of a disconnect. In addition, the proper and effective involvement of local communities in contributing to Place Briefs that are of direct relevance to where they live and work is an important step forward. In particular, any move where people locally can contribute to the planning framework, as opposed to reacting to planning proposals, will confer considerable benefits, including we believe benefits for the Council.

It is appreciated that it is not the purpose of the **City Plan 2030** document that is out for consultation to detail how Place Briefs – and indeed other parts of the Plan – will work in practice, but it is important to recognise that the NTBCC would wish Place Briefs to meet certain requirements.

1. Place Briefs need to be developed in the first instance as a response to what local communities believe to be their particular needs and priorities. They should not be reactive responses to Council-led initiatives which steer or otherwise limit local choices. For similar reasons, Briefs should cover all Council functions and responsibilities. This could also include partnership arrangements e.g. Edinburgh Integration Joint Board for Health and Social Care as part of a whole systems approach. (The Consultation document aligns Place Briefs with setting "the targets for trips by walking, cycling and public transport based on current and planned transit interventions" and "greenfield sites", but we trust that this does not indicate that Place Briefs will be skewed to particular topics but be more open.)

2. Proper arrangements need to be put in place to engage local communities in discussions about what they wish to see for their area. (The Community Council has as part of its membership representatives from residents' associations that could provide building-blocks along with the Community Council for this, although not all neighbourhoods are presently covered by these bottom-up neighbourhood arrangements). Further consideration should also be given to the Council providing necessary additional

funding for any publicity / events and facilitation to undertake this engagement. The Community Council can support the engagement as a key partner.

3. It is essential that engagement in Place Briefs be designed in innovative ways to make sure those who are excluded or marginalised in communities are engaged to get a proper community 'voice'.

4. The formal position of Place Briefs in the wider planning process, including constraints and limitations, should be precisely articulated so all communities understand in advance what influence they can exercise.

5. Place Briefs should be documents with a shared status between the Council and the relevant communities. Community Councils should have a part to play in this.

6. Individual communities and of course groups of communities will not have uniform views. The Place Brief process will need to be designed to deal with this and not, as presently happens on occasions, that the Council treats an absence of consensus as grounds for it to act as arbitrator, thereby taking responsibility and influence out of the hands of local communities.

7. Engagement in Place Briefs must extend beyond residents to include local businesses, churches/place of worship, voluntary associations and other bodies that form part of the community.

8. Where possible and appropriate, Place Briefs should specify what are to be community contributions to local areas, not just what falls to the Council, in a way that recognises that people locally can contribute to the four overriding aims of the **City Plan 2030**.

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?:

One fundamental consideration is how communities are configured for the purpose of Place Briefs. There is no absolutely correct answer for this, but Briefs should relate to areas of such a size, geography and identity to allow for effective local engagement and discussion **and** appropriateness for planning purposes, while obviously avoiding difficulties of excessive fragmentation. Some criteria should be developed to assist with determining this. Community Councils should be involved in devising the criteria, while it would also be helpful to consider existing examples that have already employed such a method to inform how best to configure 'Places' across the City.

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?

Support the principle but the answer is more nuanced that a straight yes or no – so 'No' if that's the only option.

Explain why:

The issue of the impact of any development on infrastructure is a long-standing one for Edinburgh. Clearly, IF adequate infrastructure capacity exists, then development in that location would have greater support than in an area where there are strains on the existing infrastructure. However, given the underlying premise to the City Plan 2030 in terms of continued growth and projected population increases, it is unlikely that this can all be accommodated in areas that are deemed as 'well-served' for infrastructure.

It is also worth considering – as laid out in the draft City Plan document – what infrastructure this should or does refer to or put another way, what community infrastructure do homes and businesses need ?

1. Education Infrastructure

Clearly sufficient education capacity is necessary to support continued residential expansion. This is already a required consideration in the planning process.

It is helpful that the Council has already carried out a high-level assessment of the new school infrastructure which is likely to be required to support the housing need identified for City Plan. This summary shows, as we and other community councils have been saying for some time, that significant capacity is needed in north Edinburgh – both for additional primary & secondary schools. Although historic planning applications have frequently made a contribution to this – the Council does not appear to have looked at this either pro-actively, holistically or consistently across Council departments to provide the necessary additional capacity – rather, taking Broughton Primary as an example, has downsized the available estate (& then realised that with the amount of new development, that additional facilities / capacity is required and then hurriedly added capacity within the existing playground. What is needed is a longer-term vision and more forward planning – using the Section 75 contributions more effectively. We would hope therefore that the 'full education infrastructure appraisal and strategy' will be more effective in supporting the City Plan 2030 than the current LDP.

2. Healthcare Infrastructure

This again has been an historic issue – raised frequently in representations by ourselves and others for new developments. We regularly hear concerns raised by residents about the difficulty in accessing necessary healthcare facilities (with many either having waiting lists or not accepting new applications). The normal response from planning officers is that they have little influence on additional provision. We would therefore welcome the suggestion that the Edinburgh Health and Social Care Partnership will prepare a Primary Healthcare Appraisal at some juncture, as part of preparing the Proposed Plan. This may help to ensure that the process of planning future healthcare services considers changing & projected demands because of new development. However, it's unclear exactly how this will actually ensure that adequate health care provision is available.

3. Transport Infrastructure

Again it is mentioned that in preparing Choices for City Plan and the City Mobility Plan, the Council has commissioned an Edinburgh Strategic Sustainable Transport Study (Phase 1). The study recommends four transport corridors within, and potentially beyond, Edinburgh suitable for the development of transit-led solutions (including Bus Rapid Transit (BRT) and Tram) to reduce carbon emissions, promote equality, support healthier lifestyles and deliver sustainable economic growth. These appear to be mainly driven by either probable or possible tram extensions which may or may not be deliverable (due to possible changed economic circumstances) post Covid-19. Relevant to the city centre would be Key Area Corridor 3 & 6 but these are only relevant for a small proportion of possible developments. In our view, the more relevant discussion concerns improvements in public transport across the city centre, through extension and realignment of bus services. Although improvements to walking routes (& perhaps cycling routes) are already well advanced, but we believe that the balance of expenditure should be more focussed on improvements to walking (as walking is unambiguously top of both the 'movement hierarchy' as laid down in Scottish Planning Policy (i) and the 'Sustainable Travel Hierarchy' in the new National Transport Strategy (2ii). However, whilst the theoretical primacy of walking is often recognised, it is rarely put into practice and often, when there is mention, walking is often conflated with cycling.

Furthermore, consistent with NTBCC's input to the City Mobility Plan consultation, there should be further consideration of the use of suburban rail and light rail as viable options.

The key aspect of all of the above is that identification of requirements must be cognisant of the views of local communities (including both residents and local businesses).

Secondly, the Council already has many powers to demand contributions to infrastructure improvements, but often, given the goal of pursuing continued economic growth along with pressure from developers on the impact of economic viability if levied, is often successful in reducing these contributions. Robust application of existing powers is required.

New Town & Broughton Community Council Response
"Choices for City Plan 2030"

Finally, we would argue that the scope of necessary community infrastructure (as defined by communities) would be much broader. The current pandemic has brought home to many the importance of including community resources for people to gather and respond to emergencies in natural localities. There is no mention in the draft plan about essential 'Council- run' community infrastructure such as libraries, arts venues, access to Council offices, community centres or leisure centres even though these are all important to a greater or lesser extent for a health and wellbeing economy. This could be tackled by expanding the breadth / scope of Place Briefs both for new housing developments but also for existing communities.

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:

Agree when there is a clear and easy provision for both accessible and sustainable public transport. This should also include strong community input. Furthermore, it would be helpful to more fully define community facilities. The previous plan defined these as "facilities such as local doctor and dental surgeries, local shops, community halls and meeting rooms are necessary to foster community life". This seems entirely appropriate.

Again there seems to be a focus on active travel routes but balance is needed between active travel and accessibility.

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?

Of course - yes.

Explain why:

Most people want to have local affordable community facilities, open at useful times, within their own communities - where it isn't feasible to locate specific services in each community, to ensure easy access physically, by public transport and opening hours (and perhaps access virtually on-line).

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, in principle but again the premise of the question isn't entirely clear.

Explain why:

Clear support from the community that developers should be responsible for funding improvements necessary to mitigate any negative consequences of their proposed development. It could also be seen beneficial for the developer to provide additional funding for new or expanded infrastructure but this requires precise definition as well as robust application of the policy.

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

Yes, in principle

Explain why:

If the proposal is to continue with the process outlined in the August 2018 'Developer Contributions & Infrastructure Delivery' Supplementary Guidance document such that if it is identified that their cumulative impacts i.e. arising from more than one development, a contribution zone is established, then given that this Supplementary Guidance is very recent – we can see no reason to change it without further review based on

experience. It is clear that there may well be examples where the total cost of delivering necessary infrastructure improvements in a wider area would fall disproportionally on one development then sharing these costs proportionally and fairly between all developments which fall within that area seems appropriate. This has the added benefit of negating some of the arguments regarding the economic viability of a particular scheme. That said – the onus on the council is to then agglomerate and manage these contributions appropriately and deliver the paid-for infrastructure improvements (which hasn't always been the case e.g. the infamous bridge from Greenside Row / Place to Calton Hill that remains an unsolved enigma).

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?

We do not fully understand the distinction being referred to here

Explain why:

If, as we understand it, replacing supplementary guidance with guidance contained within the plan (and in non-statutory guidance?) i.e. not a separate process, strengthens the likelihood of achieving satisfactory infrastructure improvements (as intended) then this would be welcomed.

We would also assume that this may require robust defence at planning appeals as well as being rigorously enforced.

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 – subject to the conditions explained below

Explain why:

By simply focussing on the need to reduce the usage of cars rather than all vehicles, the proposed Plan will not be able to fully meet its stated goal to create "places for people". As well as cars, the traffic in Edinburgh is made up of a large number of commercial vehicles servicing the local businesses and residential properties as well as public service vehicles including buses, tourist coaches and taxis. These vehicles add considerably to the congestion in the City especially the city centre and to the levels of atmospheric emissions resulting in unacceptable levels of pollution. The LDP should support the Council's plans for reducing atmospheric emissions and in particular the City Centre and City-Wide Low Emission Zones (LEZ). It is essential that the LEZ proposals should be more ambitious and extend Euro 5 levels of protection beyond the central business and tourism district. The expected increase in working from home following the pandemic will now make this approach much easier to achieve. This is an opportunity that should not be missed.

The NTBCC objected to the Council's LEZ proposal (July 2019) asking that the proposed "central" zone be widened to include Queens Street, York Place, London Road and Regent Road, as they would otherwise become an "alternate route" for non-compliant traffic, which can only increase pollution in residential areas adjacent to the city centre. We ask again that these streets be included in the central LEZ zone.

The Council should also use its leverage with Lothian Buses, and other operators, to ensure that all fleets operating in the Edinburgh city region meet Euro 6 standards as soon as possible. In redesigning bus routes, careful consideration should be given to the air and noise pollution, and potential structural damage, caused by routing a disproportionate number of bus journeys through any one residential street. The Council should work with Lothian Buses to ensure that city residents are not exposed to an excessive level of hazard. Similarly the Council should work with the providers of tourist coaches to ensure that they conform to the best environmental standards and that their use within the city centre is reduced. Whenever possible, tourists should be accessing the city centre on foot.

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The use of electric vehicles should be encouraged especially within the city centre area. As well as providing increased charging infrastructure to allow residents to convert to electric vehicles, the Council should use its licencing powers to require electric taxis and delivery vehicles in the City.

While we support Active Travel that promotes healthy communities we believe that any travel strategy must take account of the needs of residents and visitors with limited mobility. Otherwise the proposed hierarchy of travel options that prioritises walking and cycling may disadvantage disabled people, their unpaid carers and paid support staff. We are also concerned that public transport is not sufficiently accessible at present, let alone for a growing older population. It is important that any transportation hubs are accessible by all users.

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?

Yes – subject to the conditions explained below

Explain why:

It is appropriate that the Local Development Plan (LDP) does set targets for the use of different modes of transport expected as a result of any development included in the LDP and that this takes account of the current and planned level of public transport that may be available. Also Place Briefs should be required to demonstrate the steps that are being taken to reduce the total amount of travel that is required through co-location of residential, commercial, educational, and other community facilities to minimise the need to travel by means other than active travel.

Also any development not capable of meeting set criteria established in the LDP for the use of current and planned public transport or active travel should not be permitted. Large housing, commercial or industrial development that is not located close to existing or planned public transport should not be permitted under the LDP in order that the stated goal of reducing car usage is achieved.

It is not clear how the targets included in the Briefs will be used to determine the appropriate levels of parking required to support the high use of public transport. Given the goals to reduce car usage in the city, it is considered that before finalising the LDP the Council should establish the current availability and usage of off-street and on-street car parking spaces particularly in the city centre. This would allow the Council to determine whether the existing levels are adequate or otherwise and thus establish policies for future off-street parking consistent with the Council's overall development and environmental aims. In particular, the Council should rescind its Parking Action Plan (voted through the month before lockdown) which will expand private car-parking capacity for visitors in central Edinburgh to its highest-ever levels and, in conjunction with the 1600 spaces already approved in the new St James' Centre, would inevitably increase the volume of private car traffic in the residential centre. This runs completely counter to the Council's proclaimed aims.

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?

Yes – subject to the conditions explained below

Explain why:

We agree that the current "one size fits all" approach is flawed and that a more nuanced approach is required. The location of the development and its proximity to existing or planned public transport will impact on the perceived need to use private vehicles and thus provide parking. Just reducing the number of parking spaces in a development without addressing the demand for such places will only add to the pressure on-street parking provision.

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Edinburgh is unusual in terms of the number of people living within the city centre. Although most residents are not car owners, there are many that do require a personal car due to reduced mobility, family responsibilities or work. It is important that the Plan recognises the need for continued allocation of space for residents' parking.

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?

No – for the reasons explained below

Explain why:

It is noted that there is no intention to update TRA 5 City Centre Public Parking. This is surely an oversight as this policy currently only limits such development on grounds of adverse impact on the historic environment. There is nothing in the current policy to address the impact of any such additional parking on congestion or on public transport or active travel routes. Also, we support the introduction of a parking levy on employers and retailers in the City Centre to fund improvements in the public transport provision.

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 – subject to the conditions explained below

Explain why:

We support the intent to reduce the demand for parking spaces and encourage the use of cycles and electric vehicles not only associated with new developments but as part of the Council's aims to transform the city centre and reduce atmospheric emissions from vehicles and thus pollution. Any developments should make provision for both current (active) and future (projected) demand for electric vehicle charging infrastructure either on-site or as a contribution to a public charging infrastructure. The Choices document should include a clear intent (with a specific target) to increase the usage of electric vehicles among residents and local businesses. We would support changes to the charges for residential parking permits to encourage residents to switch to electric vehicles and use any additional revenues created to fund the acceleration of the roll-out of charging infrastructure across the City.

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 – subject to the conditions explained below

Explain why:

We support the further development of well-connected park and ride sites to reduce the need for cars to be travelling into the City Centre and to other areas in which commercial and retail businesses are located as part of plans to reduce the number of car journeys within the City. We believe that protection should also be provided in the LDP for redundant rail infrastructure in line with Scottish Planning Policy (paragraph 277) that states that "disused railway lines with a reasonable prospect of being reused as rail, tram, bus rapid transit or active travel routes should be safeguarded in development plans". The use of these disused railway lines in conjunction with either brownfield or greenfield housing development may mitigate the impact of such developments on road traffic volumes.

Currently there appears to be an over-emphasis on their use as active travel routes that do not recognise their potential value for other transport modes.

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?

Explain why:

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?

Explain why:

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?

Not entirely

Explain why:

Commenting on 8B, before committing to their use for active travel it is important as noted above that there is an assessment of their potential use for other forms of transport.

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 ?

The rise of and negative effects of unlawful short term lets on Edinburgh and its resident population has been widely recognised. We do not believe that there would be any value in designating any single community, or parts of Edinburgh as short term let control areas, as it will only move this activity in other areas, negatively affecting those local communities disproportionately. If we have learned nothing else from this pandemic, it is the importance of having residents for strong and cohesive communities, across Edinburgh. We would advocate for all of Edinburgh to be a single short term let control area, with the same criteria to judge suitability for any change of use or for residents who want to short term let their own property in full, or in part.

What may be more useful is a consultation for the residents of Edinburgh on what the licensing and enforcement of short term letting should be. PLACE Edinburgh has put forward a licensing proposal, which could be used as a basis for a consultation, as it has been generated from existing case law, learning from licensing used elsewhere in the world, and the lived expertise of Edinburgh residents who have experienced living next to short term lets across the city. The proposal has been refined from feedback received online and through face to face meetings with communities in Edinburgh. [1]

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[1] PLACE Edinburgh's proposal for licensing
https://docs.google.com/document/d/1P4GN1wHYgcElqxWZjyfMq02haxM4aWJhKUG3sZ5jMKE/edit

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 ?

There should always be a presumption against a Change of Use from residential property to commercial use as Edinburgh has a growing population, with a homelessness issue. The cost of owning or renting a home has increased higher than income and may affect the ability for younger people to remain within their communities if they wish to leave the family home, and for a healthy diversity within communities. We support the Make the Shift campaign to recognise housing as a human right. [2]

The loss of certain local retail, commercial and community facilities can have a very detrimental impact on the communities that they are intended to serve. We have seen in the city centre the loss of many businesses that have provided essential services and employment to local residents as many have been converted into tourist-focussed enterprises. If the city centre is to remain a place that people want to live in a sustainable manner it is important that the LDP provides protection against uncontrolled change of use of such local businesses.

9C We could continue to use our current policies which prevent development which would have a detrimental effect on the living conditions of nearby residents.

No

Explain why ?

The current policies do not meet the needs of residents and need to be revised, with residents.

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:

At the moment purpose-built student housing is being built at an unprecedented speed and scale. These have the potential to overwhelm local communities and infrastructure. They are not always built within a 15/20 minute walk of any educational institution which increases the need for additional travel between student residences and educational institutions.

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?

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

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[2] Make the Shift website https://www.make-the-shift.org/

Explain why:

We support the plans locate housing and community facilities adjacent to such developments to minimise travel needs and strengthen the financial viability of existing out of centre retail and commercial units, especially where there units are well located near existing or planned public transport routes.

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?

Not fully

Explain why:

Although we would generally support an increase in provision of affordable housing and understanding that the current policy (at 25%) has been in place for many years, it is clear that this question cannot be answered without being aware of possible negative consequences – in terms of impacting the level of new housing builds. It is also a significant increase above the current 'requirement'. We are also not aware of any analysis of the effect of this proposed increase and whether this would actually increase the supply of truly affordable housing.

We believe that an alternative approach is to focus on ensuring that, firstly, the 25% affordable housing requirement is delivered (see example below) and secondly, and more importantly, that this 'affordable' housing is actually affordable. It has been stated that there is particular demand for social rented housing in Edinburgh – with Social rented homes accounting for only 14% of the housing stock in Edinburgh, compared to the Scottish average of 23%. Hence, we believe that the focus should primarily be on an improved definition of affordable housing.

Therefore, we believe that the definition of affordable housing should reflect the average wage or the Living Wage rather than a figure that relates to surrounding properties; otherwise it is likely that some neighbourhoods will never be affordable to a large section of the community either as home owners or renters. This is particularly important for young people leaving the family home who wish to remain in the community that can best support them through established networks.

There must also be follow through on promised affordable housing, with enforcement action taken if necessary . A prime example of where this has not happened can be seen with Kingsford Developments that promoted the 73 property development in McDonald Road before the planning application was agreed as 'The Urban Key concept is unique and provides a new form of accommodation to address affordability issue for city and key workers.'[3] However, after planning permission the development is now advertised as luxury long term lets[4] and holiday lets.[5]

As PLACE Edinburgh highlights in its submission[6] on this question house prices have been inflated by a shortage in available housing stock due to the rapid proliferation of properties being used exclusively for holiday lets, with no resident living there, which affects what is considered affordable if prices are related to the market value.

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

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[3] Planning Statement on behalf of Kingsford Developments
https://www.broughtonspurtle.org.uk/sites/default/files/story/13_02458_FUL-REPORT-1616161.pdf
[4] Kingsford Residence webpage https://www.kingsfordresidence.com/
[5] Tripadvisor webpage for Kingsford Residence https://www.tripadvisor.co.uk/Hotel_Review-g186525-d14767056-Reviews-Kingsford_Residence-Edinburgh_Scotland.html
[6] PLACE Edinburgh's submission to City Plan 2030
https://docs.google.com/document/d/1cU8Yqu0x53xsET6409OaI4PaGWcL-U37JdsNt6Mo2So/edit

Explain why:

A mix of housing types and tenures creates diverse communities and avoids ghettos. New housing developments agreed must also be responsive to address where there are gaps in provision e.g. accessible housing or single occupant housing. New housing must be adaptable for a range of occupants and to enable people to live in their own homes for as long as possible, regardless of how their physical health may change. This pandemic has shown the importance of social connections and supports and why it is important that residents should not be forced to move away from established social connections and supports just because their home is not adaptable enough as they go through their Life Course.[7]

The majority of Edinburgh's housing stock is made up of flatted properties. As one in five people in Scotland are disabled and in order for them to live in suitable homes, and to be able to socialise with non-disabled people in their homes, many more accessible homes need to be built. New standards for accessible housing are being considered by the Scottish Government, and Edinburgh Council should be aiming to meet not just existing standards and quotas, but achieve higher quality standards and quotas to futureproof housing stock and compensate for the gaping hole in existing provision. We are an ageing population who are going to need more adaptable and accessible housing in the future than we do now.

Currently, disabled people can be excluded from social events in Edinburgh homes and bars / pubs / restaurants as these locations are not accessible to them. This is not good for the mental health of the disabled person or their friends who are forced to exclude them as building standards have not kept pace with Human Rights. The crisis in accessible housing in Scotland is already recognised by the Equality and Human Rights Commission. [8]

Large developments of homes cannot be allowed to build segregated or gated communities on the same site. They should not be able to move the affordable or social housing provision offsite, as has been done with the St James Centre development or segregation and ghettoisation will be encouraged, reducing diversity.

As noted previously, it is important that the LDP provides protection not just for a range of housing but also the range of businesses and services required to support a healthy sustainable community.

11C We could continue to use our current policy on affordable housing (Hou 6) which requires all. housing sites to deliver 25% affordable housing and our non-statutory guidance and practise note.

No

Explain why:

The current policies do not meet the needs of residents and need to be revised.

N.B This question is no longer in the online consultation

Choice 12 - Building our new homes and infrastructure

12A Which option do you support?

Option 3 A Blended Approach

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

With reference to Choice 2B above, any development site for housing within the city centre boundary would be classed as brownfield.

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[7] Public Health, UK Government https://publichealthmatters.blog.gov.uk/2019/05/23/health-matters-prevention-a-life-course-approach/
[8] https://www.equalityhumanrights.com/en/publication-download/housing-and-disabled-people-scotlands-hidden-crisis

Redeveloping the urban area can regenerate areas, maintain local services, remove local eyesores and bring land and buildings back into effective use – but a balance must be struck.

NTBCC are concerned at the potential loss of land which currently houses the light industry and services which facilitates the daily 'management' of a busy city centre and its residents. Trade services, traditional crafts, garages etc are often located in small industrial units within the city centre boundary. On land that is regarded as brownfield. This land is valuable, and easily seen as the 'perfect' solution to a housing shortage, but the hidden costs can be enormous to the city. The displacement of light industry and services to the city edges would add transport miles, pollution and time spent, contrary to the challenge faced in meeting climate change targets.

For this reason NTBCC would support **Option 3 A Blended Approach**

However, NTBCC do not support the use of Compulsory Purchase Orders as a means of delivering the plan - which removes public consensus and communities from the process.

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

Explain why:

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

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

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?

No

Explain why:

We question whether a policy which supports increasing tourism in a city already suffering from over tourism is helpful in creating a balanced economy or is sustainable given the increasing negative impacts of over tourism.

A policy which supports social enterprises, start-ups, culture, innovation, learning and the low carbon sector is welcome.

Edinburgh is celebrated as being home to the world's biggest arts festival, while this to many is an accolade it is vital that there is consistent and considered support for the city's indigenous activities and creativity. It must provide a healthy and receptive ground for visiting cultural activities and visitors but importantly must not lose sight of its all-important residents and those who work in the city.

Edinburgh needs to continue to be hospitable and welcoming to all but not to the detriment of its own residents and cultural activities. Arguably audiences – both indigenous and visiting - are becoming increasingly more discerning – there is huge cultural competition not just within the UK but also globally - and the City Plan likewise needs to support quality over quantity. 'Good growth' must attract start-ups, individuals and businesses to live and work in Edinburgh – and retain those already living and working here - who give long-term nourishment to the city. Edinburgh must continue to be a 'lived-in' city and not just a 'a hall for hire.'

The City Plan needs to support a mixed ecology that embraces innovation and learning, supports social enterprise and addresses thoroughly the climate crisis. The City Plan needs to be sophisticated and have the confidence that expected of a capital city to be innovative and forward-thinking in and of itself.

Choice 14 - Delivering West Edinburgh

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:

NTBCC support this view, however we are concerned that the City Centre, while regarded as 'healthy' by many markers is being undervalued in this report, and that its status is more fragile than presented.

We are surprised that there is no mention of the specific policies which apply to the city centre with regard to its status as a World Heritage Site and as a Conservation Area and the responsibilities therein.

The city centre is the beating heart of Edinburgh and unique in being 'lived in', with a large residential population. It is vital that all decisions regarding this core area take cognisance of the impact on and for residents, to ensure they enhance rather than detract from daily life in this thriving city centre.

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?

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?

Explain why:

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?

Explain why:

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:

Tourism industry leaders have admitted there is an over-supply in hotel rooms. They state this is already having a "negative impact" on occupancy levels and room rates, even before a string of proposed new developments across the city are either completed or come up for planning permission.[9]

In a city with limited development space, there should be a need to demonstrate a robust case for additional hotel beds.

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?

Explain why:

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:

We support a sustainable mix of employment within our area and across the city, and support steps that reduce distances people have to travel to work. Therefore we would support the continued use of strategic office locations as it would affect us in the city centre. We would support this again on the basis of having a mix of activities in the location.

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

Yes

Explain why:

We support this on the basis that a commercial centre adjacent to office space provides the possibility of nearby leisure and refreshment activities for office workers and the ability to use spare time and lunch breaks to make purchases. It also provides a ready supply of potential clients nearby to the commercial development.

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, albeit with reservations about the use of the term "significant".

Explain why:

Edinburgh is unique in having a strongly residential city centre and benefits from residents keeping the city centre alive outside of commercial and office activity times. We would agree with the proposal to provide significant office space in as much as we want office space that is available to provide work for local residents and reduce the times they may have to set aside for commuting and the impact on the local environment.

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

N/A

9
   https://www.edinburghnews.scotsman.com/arts-and-culture/edinburgh-festivals/edinburgh-builds-too-many-hotel-rooms-tourists-after-numbers-soar-50-1995436

Explain why:

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:

We support the idea of office development in our area particularly focused on addressing the needs of residents. There is an increasing trend towards work portfolio careers and working from home (which has been accentuated by the Covid-19 pandemic) and we would support the development of office space on a short term lease basis and for small companies and single individuals as a way to encourage entrepreneurship within Edinburgh, in line with government policies in relation to developing Fintech for example. We would encourage the Council to work with agencies such as Fintech Scotland and Scottish Enterprise to develop this to provide an alternative to commercial ventures such as Regus and WeWork, where prices can sometimes be prohibitive. Within this framework we would support the development of incubators for specialist industries such as investment management, to encourage a wider diversification of business within the city, and we would encourage the larger firms to engage in steps that might bring this to fruition.

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

No, although the fallout from the Covid-19 pandemic and pressure on the tourism industry may free up sooner than expected some of the significant hotel developments in the city and these may be easily converted to office space.

N.B. No option to include text for this item in online response

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

Yes, in line with our previous comments.

Explain why:

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.

Yes

Explain why:

We feel strongly that Edinburgh city centre has been unsustainably weighted to tourist and commercial development in recent years, and in order to maintain a mix of local employment opportunities we would encourage the maintenance of existing office space.

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?

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Explain why:

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?

Explain why:

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:

A continued mix of employment in the locality as offered by industrial estates is essential for bringing a diversity of roles and people into our community. Further, we would welcome the provision of industrial space that could cater for high-end businesses that could be an essential part of an entrepreneurial plan for our city.

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:

We would envisage the criteria be used to design a system that minimises the amount of heavy goods vehicles coming into the city centre, and would welcome a framework that encourages more sustainable local distribution.

Equalities and Rights

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

Explain why:

Environmental Report

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

The Choices paper was accompanied by a 207-page Environmental Report which aimed to identify environmental impact issues of each of the listed Choices. The ones most relevant to our area are those concerned with the protection of the city centre environment and heritage, particularly in relation to the large residential population. Most of the comments are sensible, albeit lacking in detail as to how they might be implemented, which will be an important factor in how effective and acceptable the policies are. A major failing in the Choices document is an appreciation of the importance of the residential component of the city centre – the primary criterion to judge acceptability or otherwise of other development must be the impact on the quality of life for those who live and work here. We do not require over scale half-digested inappropriate imported concepts.

The physical and mental health value of green spaces, linked walkway networks, provision of (or lack of) garden space for dwellings, allotments and other facilities has been highlighted in the present crisis. The policies suggested for green infrastructure are generally sound, but require a commitment to ensuring that these are

enforced in developments. In the management of green spaces, the Council must lead by example – the abdication of care in Princes Street Gardens, where the landscape has still not recovered 5 months after Christmas, is reprehensible and completely at odds with avowed green credentials. The proposal to develop "poor quality" or "underused" open space is unacceptable; once built on, it has gone for ever. Land which owners (especially public authorities) consider surplus to requirements should not be seen as windfall opportunities but should be allocated to others who can make use of them as open space.

Continuing to support the 'town centre first' approach is commendable, ensuring the economic health of the city centre. However, the balance of activities proposed – shopping, offices, commercial leisure, culture, entertainment and tourism – must each be identified and balanced to avoid any one dominating to the detriment of other users. The high residential function of the centre, above any other British city, is a valuable asset that often feels threatened by other activities – excess traffic, licensed premises, noise, over-tourism etc. – and each activity and new development must be assessed against its impact on the environment and quality of life of the existing residential population. Predictions of demand for retail and office use are now irrelevant as it is clear that ways of working and selling after the pandemic are unlikely to be the same again – no hasty decisions should therefore be made on these.

While the present pandemic is having serious unwelcome consequences, it has awakened public awareness of features such as the improved air quality and reduced noise and congestion by the removal of non-essential traffic and of construction work. Clearly these are currently at an unnaturally low level and will return to some extent afterwards, but it is important that planning is undertaken now to ensure they are controlled to an acceptable scale in future. This is both in number and type – e.g. replacing diesel and petrol vehicles with electric or other less polluting power sources, discouraging non-essential car use, concentrating on making public transport and pedestrian movement more attractive and efficient. The tram is noted as a non-polluting transport source, but the infrastructure investment required is suited only to very heavily used routes. Elsewhere electric buses should be encouraged, perhaps as hybrid bus/trolleybus forms (Rome has trolleybuses which run on batteries in the historic centre to avoid unsightly wirescapes, charging up automatically on arterial road wired sections outwith the centre). Like buses and taxis, delivery / postal / courier vehicles, which return to base each day and can therefore be readily charged, are also prime targets for non-polluting modes. Roadside charging points for private vehicles can be more problematic in terms of meeting demand and clutter. Additional cycle routes are also welcomed, but only where they do not compromise pedestrian and public transport provision – Edinburgh is not, by its topography and climate, ever likely to be a key cycling environment.

Cultural Heritage is also a major component of Edinburgh's environment. The New Town is part of the World Heritage Site and is also protected by Conservation Area and Listed Building legislation.

It is also under significant development pressure. The Statement recognises in part the need to protect the cultural heritage from the negative impacts of development. However, there is scant mention in the documentation of the importance of ensuring townscape and urban design quality in new buildings; a major omission is any reference to architectural quality, and developments of inappropriate massing, scale, skyline and materials continue to be allowed by a reactive planning system which sometimes capitulates in the face of developer pressure. High quality urban environments have been demonstrated as having a beneficial effect on the health and well-being of individuals and of societies.

The Statement examines potential development sites throughout the city. Those identified within the NTBCC area include Eyre Terrace / Dundas Street (RBS); India Place (Stockbridge Health Centre); Eyre Place / Rodney Street; and Broughton Market. These and other smaller proposals have or will be dealt with by the NTBCC separately at appropriate times.

In terms of new development, the Statement aims for carbon neutral buildings. This is commendable but it must be genuine and not simply offsetting in third world countries. It should also acknowledge that existing buildings – which will continue to comprise the mass of properties in the NTBCC area – may not meet the highest standards of insulation and energy saving, but have already paid off their carbon footprint many years ago, more than compensating. The proposed increases in density are cautiously welcomed, providing they do not become an excuse for 'town cramming' or for pressurising the loss of worthwhile existing buildings; all new developments must ensure adequate surrounding space, garden space for residents, suitable distancing from other buildings, and daylight / sunlight penetration.

New Town & Broughton Community Council Response

"Choices for City Plan 2030"

Inevitably, the pressure after Covid-19 is likely to have a strong emphasis on economic recovery, with climate change, carbon neutrality and environmental considerations will not always be seen as a priority for some considerable time. It will therefore be necessary to be vigilant at each stage. The Council will play a leading role in recovery, and so new proactive dynamic leadership in planning and economic development, with a proper understanding of the issues involved, is required to ensure that the outcome is worthy of Edinburgh.