

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

Explanation As with all SEPA comments on this questionnaire, our response should be seen in the context of our response to the Environmental Report (our reference PCS/169988). Please note, we will only comment on those Choices and questions relevant to SEPA's role and remit and where we have expertise. Yes, SEPA fully supports a city-wide, regional and national green network. The city wide network should be a priority for delivery if CEC plan to develop high density brownfield sites. We see this as essential in delivering sustainable inclusive growth in the context of climate change and biodiversity crises and meeting strategic commitments such as those outlined in NPF4, Climate Change Plan, Public Reform Scotland, etc. Blue-green infrastructure is a key tool in building resilience in respect of climate change while having the potential to deliver transformational change in respect of a wide range of social, economic and environmental outcomes. It will be crucial that policy wording in the LDP provides clear direction in respect of outcomes, rather than the connection between the policies and desired outcomes being undefined. It is crucial that action is prioritised in accordance with a mapped evidence base. It is fundamentally important that blue-green provision is planned in parallel with related deliverables e.g. active travel provision, surface water drainage systems, natural flood storage and Flood Risk Management Strategies, wildlife corridors, reuse of vacant and derelict land to support local communities, etc. We are aware that the Council recognises this context and is taking consideration of best practice elsewhere. The proposal to feed requirements arising from this mapping work into site briefs in the proposed LDP is strongly supported. Also imperative is consideration of the use of land (including protection of carbon rich soils), water, energy and materials in parallel to ensure sustainable uses are maximised. Clarifying the "how" of implementation is obviously fundamental in successfully maximizing best practice on the ground. While the need and benefits of blue-green infrastructure are well documented and much planning policy is supportive of these, it is crucial that transparency on "how this should be delivered" is provided. SEPA is happy to continue to support the Council, alongside other agencies in developing guidance/standards providing this clarity and commend the weighting that the Council intends to attribute to this in informing decision making. Defining the "how of implementation", relates to process, what needs to be considered by whom, with whom do they need to collaborate, what needs put in place to ensure that need is secured in perpetuity while maximizing multi-benefits. Examples of measures include: - •The need for an infrastructure-first approach taking account of the natural hydrology of the site (from the earliest design stage) •The importance of landscape architect input in adding "place-specific value" (from earliest design right through to informing maintenance schedules) SEPA has recommended that a process diagrammatic outlining stages in successful blue-green infrastructure could usually sit at the start of Edinburgh rainwater guidance, with hyperlinks to further detail. Furthermore, LDP site briefs could usefully refer to this process diagrammatic. Fundamentally important, and

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intrinsically related to the “how of implementation”, is the need to raise the baseline of what is required both by the development industry and public in respect of blue-green infrastructure provision. A requirement to design and build in accordance with the Building for Nature qualitative benchmark for blue-green infrastructure would make a significant contribution in this regard. The benchmark requires the consideration of standards relating to water, wellbeing and wildlife in a spatial context in terms of what they contribute to that place and wider connectivity. All standards are considered in the context of their contribution to climate change. The benchmark is commonly applied in respect of residential commercial and mixed development, supporting Planning Authorities in answering “what would good GI look like, in these circumstances, on this site?” “What value could potentially be added?” The scheme offers reassurance to Planning Authorities that do not have these specialisms in-house that comprehensive consideration has been given to these aspects of the development from landtake right through to maintenance and management. Developer feedback has indicated Building with Nature significantly reduces planning uncertainty by facilitating them in achieving many of the place-led objectives Planning Authorities require of them. Accreditation can be applied by Planning Authorities re policy making (see West Dunbartonshire Local Development Plan 2) and by the development industry in respect of individual developments bringing obvious marketing benefits. Crucial in achieving the above are powers to allocate funding where need is greatest and multi-benefits can be maximised. This will require careful thought and ingenuity from the Council, in maximizing transferability of funds, considering non-traditional funding measures, etc. In some instances these priorities can be taken forward aligned with a development. Regardless of whether this is feasible or not, all development should contribute to the funding of blue-green infrastructure priorities previously identified through mapping (as above). Funding should be proportionate to developer’s margin for return from their development. Monies need to be ring fenced and flexibility built in to allow the Authority to use these funds wherever they consider most appropriate. Funds cannot be tied to the development from which they were generated as this may have no relation to mapped GI priorities. In working to ensure best practice in design is realised on the ground, there may be potential to use a geotagging system to help ensure minimal resource input. Scottish Water has already successfully piloted this and now require contractors to submit a series of detailed photos with coordinates verifying that build of certain structures is exactly as designed. SEPA considers that the ‘blue’ element of green and blue network includes our coastlines, lochs, river corridors, routes for rain and surface water and their flood plains. The extent of flooding in the future due to climate change should also be included. SEPA strongly recommends that a strategic flood risk assessment should be carried out and that this is used to inform the LDP, including the green and blue network. Several of the rivers in the City of Edinburgh are at less than good status for fish barriers, alterations to physical condition and as a result have altered sediment managements regimes, poorer ecology are less resilient to climate change, flooding or water scarcity. We refer to ‘managing flood risk’. To achieve this a strategic approach to water management is necessary. We must emphasise, however, that avoidance of increased flood risk, is a critical element of the strategic management of water. Elements of this strategic management of water include: not building in the flood plain; increasing upstream capacity; managing surface water both to avoid localised surface water flooding and to avoid adding to fluvial or coastal flooding. Measures to protect from water scarcity are also encouraged, creating better riparian habitats, less uniformity, more complex bed structures, etc.

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Choice 1 B

We want to change our policy to require all development (including change of use) to include green and blue infrastructure. Do you agree with this? - Support / Object

Short Response: Yes

Explanation SEPA agrees with this Choice. We support it for the following reasons.1. It will help reduce the impact of climate change on the people of Edinburgh, in particular it can help reduce the impacts of floods and heatwaves.2. It will provide benefits for the health and wellbeing of the people of EdinburghA key component to the success of this is how this multifunctional green and blue network will be implemented, at different spatial scales. SEPA has expressed its willingness to support Edinburgh Council and other partners in the identification and implementation of this network. Elements to be addressed include how the blue and green network will tie in with the 'extra large' green space standard (1E) proposed design and access statement (2A) revision of design and layout policies (2C) creation of place briefs (4A) etc.Good planning, design and implementation is key to ensure the green and blue network is integrated with the urban (and rural) landscape and is not seen as a separate element, is multifunctional in order to deliver multiple benefits to the people of Edinburgh. This includes (but is not limited to) consideration of:

- People - providing attractive places for people to live and work, making our communities happier, healthier and more prosperous
- Biodiversity
- Water quality including physical condition – access to a clean and natural water environment is important to health and well-being of the people of Edinburgh.
- Flood risk (river, coastal and surface water) (both now and in the future due to climate change) - Making our communities more resilient in times of extreme weather such as floods, droughts and heat. This is important in a changing climate where extreme weather is expected to happen more frequently.
- Interactions with the sewer network (e.g. surface water flows into sewer and other inflows e.g. where watercourses enter the sewer network and coastal influence). Reducing water inflows into the sewer network can help free up capacity for new development

SEPA consider that the 'blue' element of green and blue networks includes our coastlines, lochs, river corridors and routes for rain and surface water, and their flood plains. Forecasts of flooding in the future due to climate change should also be included in consideration of this network.(For further detail, please see our response to the ER, our reference PCS/169988.)

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Choice **1 C**

We want to identify areas that can be used for future water management to enable adaptation to climate change. Do you agree with this? - Yes / No

Short Response

Explanation Yes, SEPA agrees areas should be identified for future water management to enable adaptation to climate change. This should be part of the green and blue network. This has benefits for water management but also climate change adaptation, air quality and biodiversity. SEPA consider that this should include all water as part of the green and blue network, the 'blue' element includes our coastlines, lochs, river corridors, routes for rain and surface water and their flood plains. The extent of flooding in the future due to climate change should also be included. The First Minister declared a climate emergency. Climate change is expected to increase the frequency and magnitude of extreme events such as floods and heatwaves and the UK (and Scotland) Climate Change Risk Assessment identifies flooding as one of the greatest climate risks. Edinburgh already has risks of flooding from rivers, the sea and torrential rain. UK Climate projections 2018 improves our understanding of the impacts of climate change with future increases in sea level rise, rivers flows and rainfall intensity being greater than previously understood. It is important that Edinburgh is prepared to manage the impacts of climate change that we are experiencing already, as well as prepare for impacts that we will feel in the longer term. Green and blue infrastructure that considers climate change is a key measure to help Edinburgh adapt to this changing climate and reduce the impacts of extreme weather such as floods and heat, making communities more resilient. SEPA is happy to work with Edinburgh City Council and other partners to determine HOW this multifunctional green and blue network will be implemented (at different spatial scales) and support them in the implementation. Again SEPA recommends a strategic flood risk assessment is carried out to inform this work and the rest of the LDP and associated initiatives. In terms of areas that can be used for future water management to enable adaptation to climate change, SEPA will provide resources to work with the City of Edinburgh Council and partners like Scottish Water, through the development of the City Plan 2030 to identify these areas, for instance based on determining flow paths for surface water through the city, the full extent of the catchment areas of watercourses (with the aim of avoiding development in the 1:200 catchment with additional climate change allowance), the likelihood of sewer flooding, and where watercourses can be de-culverted at maximum benefit and minimum cost to all public and private sector partners. (A strategic flood risk assessment is needed to achieve this.) We can also advise on where river restoration will yield the most benefits. A project funded through ECOCO LIFE and lead by Scottish Wildlife Trust will also help identify water environment opportunities. Green infrastructure performs an important role in, reducing surface water runoff through infiltration. Blue features contribute to flood storage supporting flood mitigation and adaptation. Please see the March 2020 report issued by the European Environment Agency - Healthy Floodplains Have A Key Role to Play in Supporting Our Environment. This document highlights the importance of better preservation and restoration of floodplains, given the key role they play in improving biodiversity, water, and climate change mitigation and adaptation. The report advocates the need for more of an ecosystem-based approach in managing floodplains would help to conserve and restore biodiversity, reduce chemical and nutrient pollution in rivers, lakes and wetlands, and increase water retention. There should be an insistence on dealing on surface water drainage above ground with Sustainable Urban Drainage Systems incorporated as part of wider blue-green infrastructure. This is the single most effective step that could be taken to manage surface water flooding, while also contributing to water quality, biodiversity and sense of place.

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Ensuring adequate landtake for GI, prior to the determination of development densities is crucial and requires consideration by the surveying industry. An important aspect of these calculations is the consideration of flood management taking account of the natural flow paths and flood plains. It is vital that a requirement to adequately protect and enhance buffer strips is applied nationally deviations made a very rare exception. Surface water drainage infrastructure and wider GI opportunities should be informed by the natural flow of water across the site and considered at the outset of the design process. Achieving best practice in design will require funding to be set aside for landscape architect input from design right through to realisation on the ground.

Ensuring design agreed is realised on the ground is crucial (see geotagging suggestion in our answer to Choice 1A). Long term management and maintenance is a pre requisite (not a “nice to have”) and requires to be considered from the outset of the visioning stage.

Choice **1 D**

We want to clearly set out under what circumstances the development of poor quality or underused open space will be considered acceptable. Do you agree with this? - Yes / No

Short Response

Explanation SEPA recognizes opportunities for the development of open space will arise but these must be rigorously assessed with regard to alternative provisions and the balance of existing eco-system services benefits, supported by the place standard. In 2019 the Scottish Government and COSLA agreed to adopt the Place Principle. The Place Principle states that all partners need to work collaboratively, and with communities to make the best use of our combined energy, assets and resources, working towards the most relevant outcomes for that place. The Place Principle helps articulate the vision and ambition that we share for our country at a local level. The Place Standard tool was produced by the Scottish Government, Public Health Scotland, Architecture and Design Scotland and Glasgow City Council and launched in December 2015. The Place Standard tool supports and allows individuals, communities and public, private and third sector organisations to think about both the physical elements and the social aspects of a place together in a structured way by asking a series of questions based on the evidence about which aspects of place are important to health and wellbeing, This provides a framework for evaluation, for assessing the strengths and weaknesses and for prioritising areas for action to improve new and existing places. The Place Standard tool is designed to support a place-based approach and the delivery of high quality, sustainable places that promote community wellbeing and more positive environmental impacts, maximising the potential of the physical and social environment to support health, wellbeing and a high quality of life and reduce health inequalities. We consider that built development in existing open space, such as parks or playing fields, is acceptable if the remaining open space was re-structured to provide greater benefits for water management, recreation, etc. can be re-structured to make a more effective contribution to the green and blue network.

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Choice 1 E

We want to introduce a new 'extra-large green space standard' which recognises that as we grow communities will need access to green spaces more than 5 hectares. Do you agree with this? - Yes / No

Short Response

Explanation Yes SEPA welcomes this ambitious new standard. This will ensure the City continues to be a wonderful place to live and work. This ties in with other policies on green and blue infrastructure, also this scale of public space meets the scale of development being proposed for Edinburgh and it provides part of the space needed for the strategic drainage and water management needed to reduce flood risk, deal with surface water that will no longer be accepted into the combined sewer, provide an alternative for surface water currently going into the surface sewer and help build the city's resilience to climate change. Making network connections will also be extremely worthwhile and build more resilience: rivers and their associated wetlands, ponds and pools form the ultimate nature network and respecting and allowing their existence within the fabric of the city should be part of the plan for Edinburgh.

Choice 1 F

We want to identify specific sites for new allotments and food growing, both as part of new development sites and within open space in the urban area. Do you agree with this? - Yes / No

Short Response

Explanation SEPA considers that these sites could form part of a connected, considered, multi-functional green/blue infrastructure. By giving parts of the green network a function, and individuals or community groups an interest in maintaining them, maintenance of part of the green network and community involvement in it is built in and associated wins for climate change, air quality and biodiversity can be delivered.

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Choice **1 F**

We want to identify specific sites for new allotments and food growing, both as part of new development sites and within open space in the urban area. Do you agree with this? - Upload (max size 3mb)

Short Response

Explanation

Choice **1 G**

We want to identify space for additional cemetery provision, including the potential for green and woodland burials. Do you agree with this? - Yes / No

Short Response

Explanation SEPA recognizes the need to identify additional cemetery provision as interment will remain the preferred choice of many people. Cemeteries, however, need to be developed with great care to ensure contamination of ground water is not an unintended consequence. We will work with CEC to help identify suitable sites.

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Choice **1 H**

We want to revise our existing policies and green space designations to ensure that new green spaces have long term maintenance and management arrangements in place. Do you agree with this? - Yes/No

Short Response

Explanation SEPA considers that proposals for the agreement of long term maintenance and management of green spaces and any water management infrastructure is as essential, so that it continues to be high quality and perform its functions both now and for future generations of the community. Without achievable long-term management goals and maintenance of these features their functions will fail. Applications for development must be required to be supported by demonstration that such long-term management and maintenance is achievable. Monitoring should also be considered, both before and after development. This is particularly important when it comes to aspects of managing the water environment (including management of SUDS) as insufficient maintenance can lead to increase in flood risk and risk of assets failing and resulting in flooding. Responsibilities in relation to the different aspects of managing water is also complex (e.g. responsibilities of riparian owners, responsibilities of the different authorities) and needs to be made clear and this should form part of the green and blue network plan. When infrastructure performs 'multiple functions' this can also make ownership and maintenance responsibilities more complex and this must be addressed (e.g. may perform services that are the responsibility of many organisations). Consideration needs to be given to how responsibilities for wider open space be managed in conjunction with surface water management infrastructure (SUDS) e.g. Scottish Water responsibilities, council responsibilities land / riparian owner responsibilities.

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Choice **2 A**

We want all development (including change of use), through design and access statements, to demonstrate how their design will incorporate measures to tackle and adapt to climate change, their future adaptability and measures to address accessibility for people with varying needs, age and mobility issues as a key part of their layouts. - Yes / No

Short Response

Explanation SEPA fully supports this measure. We would suggest as a possible alternative, however, that applicants should have to demonstrate how the design will reduce/minimize emissions, rather than tackle climate change. Emissions include both greenhouse gases and air pollutants. It is possibly something that can be more easily measured and demonstrated. Off-setting climate change and being adaptable to climate change, e.g. reducing flood risk (and not merely avoiding it) and being resilient to flood risk should be demonstrated in all applications. This should include detail of how water including flooding is managed (the green and blue network) and how it links to more strategic networks. For example how do proposed developments link up with the 'extra-large' green space standard (1E) proposed design and access statement (2A) revision of design and layout policies (2C) creation of place briefs (4A) etc. Water saving at times of scarcity is another important consideration. Place is at heart of ensuring the delivery of a coherent policy as part of wider adaptation actions to tackle climate change. Therefore it is vital that developments maximise opportunities to use low/zero carbon heat and this is clearly identified in development design. - This requires the inclusion of clear, supportive policy frameworks within the City Plan that draw on existing data sources (e.g. the Scotland Heat Map) and emerging projects to ensure opportunities to use low/zero carbon heat sources are taken by new developments. - Additionally the City Plan must support the delivery of Local Heat and Energy Efficiency Strategies (LHEES) which identify the key areas for improving energy efficiency, and opportunities for local heat solutions at a site specific level. The spatial element of the LHEES should influence new development to ensure they are more energy efficient, the efficient generation and transportation of energy and the utilisation of low carbon energy where an energy demand remains. - New developments should be expected to address their heat demand in line with the LHEES and investigate the feasibility of alternative heat sources and implementation of bespoke on site solutions. Additionally the design and layout of a development must be underpinned by the energy hierarchy with greatest priority given to reducing energy demand through location, siting, form, design and connectivity. The potential future energy needs of development must also be demonstrated and addressed as far as possible, such as the reduced need for central heating as energy efficient buildings are constructed but increasing demand for electricity or alternative energy sources such as hydrogen for appliances and vehicles.

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Choice **2 B**

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

Short Response

Explanation SEPA supports high density housing if located by active travel networks and public transport and developed sensitivity to the existing, natural environment. Reducing the need to travel will have positive impacts for the climate and air quality. High density also allows more equivalent space to provide for surface water management. Ideally, proposals for water management on high density sites (or sites of any density) should be integrated with proposals or existing features on adjacent sites as part of an interconnected network of landscape, access for active travel, water management. In high density developments the importance of Habitat networks escalates and integrating planning can deliver huge benefits. High density development also affords benefits in the planning and development of efficiencies in energy generation, transmission and use on sites, to ensure that the benefits of economies of scale and maximisation of on-site resources is achieved. This includes identifying connections to energy infrastructure, opportunities for onsite generation of energy, opportunities for use of waste heat, energy storage and adaptability of services. The use of masterplanning and design of high density sites can maximise space opportunities and optimise the use of energy in accordance with development needs and future demand.

Choice **2 C**

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

Short Response

Explanation SEPA fully supports this. This benefits air quality and supports the transition to a net zero city by 2030. It also complements the vision of the City Mobility Plan. The expansion, improvement or re-instatement of active travel routes in combination with river restoration measures is a major component of current SEPA Water Environment Fund support. This, in combination with development improvements, could unlock major benefits for Edinburgh. It also reduces overall energy consumption through reducing private vehicle movements and fuel use. Development layouts must also ensure that sustainable transport options are available and accessible to people of all needs and abilities. This is to ensure that the sustainable transport network is equitable and designed to support use by people who use wheelchairs, electric mobility aids as well as people who have prams, all sorts of bikes, etc. Electric charging points must also be made available for all electric vehicle types, including mobility vehicles.

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Choice **2 D**

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

Short Response

Explanation -SEPA considers this Choice as one of the site-specific aspects of the wider strategy for green and blue infrastructure and open space provision. We support the provision for open space clothes drying as this provides an alternative to increased energy use through appliances and central heating to dry household items.-SEPA considers this Choice as one of the site-specific aspects of the wider strategy for green and blue infrastructure and open space provision. We support the provision for open space clothes drying as this provides an alternative to increased energy use through appliances and central heating to dry household items. In relation to 'blue infrastructure' all development must consider how water will be managed and flood risk avoided

Choice **3 A**

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

Short Response

Explanation SEPA agrees that the Platinum standard must be met for the Council to achieve the net zero carbon emissions as set by the Council's declaration of a climate emergency, the commitment to a zero carbon city by 2030 and the targets set by Climate Change (Emissions Reduction Targets) (Scotland) Act 2019. This can only be achieved by balancing carbon emissions from existing development with eliminating carbon emissions from new development (and carbon removal). The lifespan of a development means that if it is planned without due consideration for its place in the net zero emissions future we are locking in complex and costly retrofitting problems which only increase the economic, environmental and social burden of tomorrow. Ensuring the delivery of the Platinum standard for buildings and conversions is one part of the whole systems approach which the Council will have to adopt in planning for the city's future energy and resources consumption. This will require clear policy direction across all Council areas, especially planning, with further collaboration between departments such as building standards and planning and better engagement with internal and external stakeholders to deliver the necessary innovation and solutions to achieve this.

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Choice 4 A

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

Short Response: Yes

Explanation SEPA fully supports the preparation of Place Briefs. This is in line with the Place Principal. If we get place-making right together, we can protect the environment, tackle air pollution, incorporate site specific elements of a strategic drainage system as part of the green and blue network and create better, more sustainable places, contribute to improved physical and mental health and provide high quality spaces for work, life and play. This in turn makes locations more attractive for business too. Place Briefs must also ensure that energy is treated as a fundamental element of place-making as it is central to achieving the Council's 2030 net zero targets. Energy is a vital part of the Council's inclusive economic growth ambitions, is integral to the delivery of high-quality, cost-effective buildings and homes and to tackling congestion and management of poor air quality. As previously identified there are a number of resources now available which allows for the Council to plan for energy across the different areas in a place-specific way including the LHEES strategies and clear and supportive policies direction at all stages of development decision making. This allows for place based solutions to local energy need and issues to be addressed coherently through the planning system, rather than applying the traditional one policy fits all approaches.

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Choice **4 B**

We want to support Local Place Plans being prepared by our communities. City Plan 2030 will set out how Local Place Plans can help us achieve great places and support community ambitions. - How should the Council work with local communities to prepare Local Place Plans?

Short Response

Explanation SEPA recommends the use of the Place Standard tool which allows individuals, communities and public, private and third sector organisations to think about both the physical elements and the social aspects of a place together in a structured way by asking a series of questions based on the evidence about which aspects of place are important to health and wellbeing. This provides a framework for evaluation, for assessing the strengths and weaknesses and for prioritising areas for action to improve new and existing places. The Place Standard tool is designed to support a place-based approach and the delivery of high quality, sustainable places that promote community wellbeing and more positive environmental impacts, maximising the potential of the physical and social environment to support health, wellbeing and a high quality of life and reduce health inequalities. A revised version of the Place Standard tool will be launched in 2020 to address gaps in the original tool identified in a changing climate, including enhancements to better enable place-based conversations to address climate change and improve environmental sustainability. Consideration of green and blue infrastructure should be encouraged.

Choice **5 A**

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

Short Response

Explanation SEPA considers that development should not be planned in areas with no existing or potential for sustainable transport infrastructure if CEC are to meet the 2030 net zero carbon city commitment. Sustainable transport infrastructure should be in place before development becomes operational. The definition of community infrastructure could be extended to include empowering the community to deliver other infrastructure needs such as energy production. SEPA is happy to support the local authority and Scottish Water to consider how waste water infrastructure (waste water treatments works and waste water network) and water supply infrastructure can support the planned growth and adapt to climate change without having a detrimental impact on the environment, so that the people of Edinburgh can enjoy access to a clean environment both now and in the future. Requirements for green and blue infrastructure should also be considered.

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Choice 5 B

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

Short Response

Explanation

Choice 5 C

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

Short Response

Explanation

Choice 5 D1

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

Short Response

Explanation

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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

Explanation SEPA considers that to meet the ambitions of the City Plan, the City Mobility Plan and the associated initiatives and plans it will be necessary for everyone to contribute and play their part, from citizens and visitors using public transport and active travel options rather than the private car to developers contributing to the infrastructure needed to support new development while not compromising the existing city. 'Cumulative contribution zones' recognizes that developing the city and meeting the challenges faced by this plan is a combined and shared endeavor. Achieving the framework of infrastructure needed to support individual developments on individual sites is very unlikely if taken forward on the basis of individual developments on individual sites. This infrastructure include the green and blue network. Partnerships, using a mixed of funding streams, working together to enhance existing or create new water environments and habitat networks will be a key element for success.

Choice 5 E

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

Short Response

Explanation SEPA fully supports this proposal to replace supplementary guidance for developer contributions and to set this out in the plan itself and in the Action Program. We would also suggest these developer contributions should be set out in site briefs. An element of the LDP being developed for Edinburgh, which we fully endorse, is its holistic approach to development in face of the challenge of climate change and an existing infrastructure which is, at best, at full capacity. In the same way, the LDP and site briefs, as part of a statutory document, set out the requirements for density, building standards and open space, we consider the LDP, Action Program and site briefs should specify the contributions applicants will need to make to ensure there is the infrastructure in place to support their developments and to take pressure off the existing city which is the foundation for all new development. This should also include consideration of how developer contributions will contribute to the implementation of green and blue infrastructure.

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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

Explanation

Choice **6 B**

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

Short Response

Explanation

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Choice **7 A**

We want to determine parking levels in development based on targets for trips by walking, cycling and public transport. These targets could be set by area, development type, or both and will be supported by other measures to control on-street parking. Do you agree with this? - Yes / No

Short Response

Explanation SEPA agrees with this proposal. CEC will need to identify ways, however, to ensure that users of new developments with restricted parking do not cause displacement issues by parking in other unrestricted areas. Travel plans for new developments highlighting active and public transport options could mitigate this as well as restrictions on street parking. Car clubs provide access to a vehicle to those living in restricted parking areas and a policy on support for car clubs in restricted parking developments could be considered. Restrictions should ideally be set on the development type and if the area does not have existing active and public travel infrastructure, new infrastructure should be built as a prerequisite of planning approval.

Choice **7 B**

We want to protect against the development of additional car parking in the city centre to support the delivery of the Council's city centre transformation programme. Do you agree with this? - Yes / No

Short Response

Explanation SEPA does agree with this intention. As elsewhere in our advice on this plan, the LDP, CMP, the LEZ and ECCT must be coordinated to ensure that cars and car parking are not simply displaced into areas around the central area of the city. Opportunities should be explored to maximize the potential to create more space for people, water and wildlife in the city centre. If design for extreme rainfall and climate change is considered integral to all the city centre transformation projects there is potential for this to increase greatly Edinburgh's resilience to the effects of extreme rainfall which is expected to happen more frequently with climate change.

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

Supporting Info
Email

Choice **7 C**

We want to update our parking policies to control demand and to support parking for bikes, those with disabilities and electric vehicles via charging infrastructure. Do you agree with this? - Yes / No

Short Response

Explanation

Choice **7 D**

We want to support the city's park and ride infrastructure by safeguarding sites for new park and ride and extensions, including any other sites that are identified in the City Mobility Plan or its action plan. Do you agree with this? - We want to support the city's park and ride infrastructure by safeguarding sites for new park and ride and extensions, including any other sites that are identified in the City Mobility Plan or its action plan.

Short Response

Explanation

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

Supporting Info
Email

Choice **8 A**

We want to update our policy on the Cycle and Footpath Network to provide criteria for identifying new routes. Do you agree with this? - Yes / No

Short Response

Explanation SEPA considers that all of the above routes should be safeguarded in the plan as well as walking and cycling routes identified in the ECCT plans. These routes help deliver the shift to active travel and public transport identified as necessary for this LDP, the CMP, the LEZ and all other plans and initiatives to deliver a city that safeguards the health of its citizens and visitors and will achieve carbon neutrality. Opportunities should be explored for integrating these routes as elements of the multifunctional green and blue network and SEPA is happy to work with Edinburgh City Council to identify where and these combined routes and multifunctional green and blue network could be implemented (at different spatial scales) and support them in the implementation, and better understand how this links up with other proposed policies and requirements e.g. (1E) proposed design and access statement (2A) revision of design and layout policies (2C) creation of place briefs (4A) etc.

Choice **8 B**

As part of the City Centre Transformation and other Council and partner projects to improve strategic walking and cycling links around the city, we want to add the following routes (along with our existing safeguards) to our network as active travel proposals to ensure that they are delivered. Do you agree with this? - Yes / No

Short Response

Explanation

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

Supporting Info
Email

Choice **8 C**

We want City Plan 2030 to safeguard and add any other strategic active travel links within any of the proposed options for allocated sites. We also want the City Plan 2030 to include any new strategic active travel links which may be identified in the forthcoming City Plan 2030 Transport Appraisal, the City Mobility Plan, or which are identified through this consultation. Do you agree with this? - Yes / No

Short Response

Explanation SEPA does support the proposals outlined for 8A above. These routes help deliver the shift to active travel and public transport identified as necessary for this LDP, the CMP, the LEZ and all other plans and initiatives to deliver a city that safeguards the health of its citizens and visitors and will achieve carbon neutrality. These routes can, where appropriate, form part of the strategic green and blue network. SEPA support the proposals outlined in 8C. These routes help deliver the shift to active travel and public transport identified as necessary for this LDP, the CMP, the LEZ and all other plans and initiatives to deliver a city that safeguards the health of its citizens and visitors and will achieve carbon neutrality. Where possible these proposals should be delivered as part of a multifunctional green and blue network which should have the same safeguards.

Choice **8 C**

We want City Plan 2030 to safeguard and add any other strategic active travel links within any of the proposed options for allocated sites. We also want the City Plan 2030 to include any new strategic active travel links which may be identified in the forthcoming City Plan 2030 Transport Appraisal, the City Mobility Plan, or which are identified through this consultation. Do you agree with this? - Upload new cycle routes

Short Response

Explanation

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

Supporting Info
Email

Choice 9 A

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

Short Response

Explanation SEPA has no direct remit for this issue, but we support this proposal as it will help meet Edinburgh's housing need based on existing stock (and embodied carbon and energy). It will also reduce the need to build in new areas which may be difficult to provide with the infrastructure needed to support it and may have an impact on environmental quality which may be difficult to mitigate. This existing stock of potential permanent homes tends to be in areas which are currently well-served by public transport.

Choice 9 B

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

Short Response

Explanation SEPA has no direct remit for this issue, but we support this proposal as it will help meet Edinburgh's housing need based on existing stock (and embodied carbon and energy). It will also reduce the need to build in new areas which may be difficult to provide with the infrastructure needed to support it. This existing stock of potential permanent homes tends to be in areas which are currently well-served by public transport. We would support change of use to "other uses" if this was a change to a type of use that was less vulnerable to flood risk than housing or any other form of residential use. That is, we would support a change of use from housing to other less vulnerable uses such as commercial premises in areas of the city that are a flood risk.

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

Supporting Info
Email

Choice **10 A**

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

Short Response

Explanation SEPA supports this because of the explicit requirement for such accommodation to be located directly on routes for public transport and active travel which connect directly with the university or college the accommodation serves. This will reduce emissions, align with the CMP and help to deliver the requirement for the city to be carbon neutral by 2030.

Choice **10 B**

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

Short Response

Explanation SEPA has no apparent direct remit for this Choice, however, we support this as it will help meet the housing need, and (in view of Choice 10A above) it means the additional housing will be co-located with university accommodation which has been specifically sited on public transport and active travel routes. We understand that the active travel and public transport routes are specifically chosen for access to universities and colleges. Developing this policy to link with others in the LDP and CMP, however, should result in all development of this kind being acceptable when it does adhere to the same principle supporting applications for university and college accommodation.

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **10 C**

We want to create a new policy promoting the better use of stand-alone out of centre retail units and commercial centres, where their redevelopment for mixed use including housing would be supported. Do you agree with this? - Yes / No

Short Response

Explanation SEPA would support this policy especially if 'better use' included combinations of purposes: park and ride; collection hubs; parts of the green and blue network; good access to public transport and active travel routes.

Choice **11 A**

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

Short Response

Explanation SEPA supports this Choice. There is a specific housing requirement and a specific requirement for affordable housing. Even a Choice which results in the lower number of market housing will be challenging to accommodate within existing infrastructure and the difficulties of financing and achieving new infrastructure, and within the context of existing environmental carrying capacity which will be further impacted by the realities of climate change. Providing the necessary affordable housing with the lower number of market housing is, therefore, preferable.

Choice **11 B**

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

Short Response

Explanation SEPA has no comments on this Choice

Customer Ref: 01274 Response Ref: ANON-KU2U-GFF3-D
Name: Paul Lewis
Response Type: Key Agency
On behalf of: Scottish Environment Protection Agency (SEPA)

Supporting Info:
Email: Paul.Lewis@sepa.org.uk

Choice 12 A

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

Short Response: Option 1 (Council/

Explanation SEPA supports Option one. This has the most benefit in terms of improving air quality and reducing greenhouse gas emissions as housing will be built near existing services with access to active, public and low emission transport. Sustainable travel is critical if Edinburgh is to be a net zero carbon city by 2030. We must emphasize that although we support this option, it must be recognized that some parts of some of these sites will not be suitable for housing as they are at greater flood risk and this flood risk will only increase because of climate change. There is a specific housing requirement and a specific requirement for affordable housing. Even a Choice which results in the lower number of market housing will be challenging to accommodate within existing infrastructure and the difficulties of financing and achieving new infrastructure, and within the context of existing environmental carrying capacity which will be further impacted by the realities of climate change. Providing the necessary affordable housing with the lower number of market housing is, therefore, preferable.

Choice 12 B1

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

Short Response: Not Answered

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **12 B2**

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

Short Response

Explanation

Choice **12 B3**

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

Short Response

Explanation

Choice **12 B4**

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **12 B5**

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

Short Response

Explanation

Choice **12 B6**

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

Short Response

Explanation

Choice **12 B7**

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

Short Response

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **12 B8**

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

Short Response

Explanation

Choice **12 B9**

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

Short Response

Explanation

Choice **12 B10**

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

Short Response

Explanation

Customer Ref: 01274 Response Ref: ANON-KU2U-GFF3-D
Name: Paul Lewis
Response Type: Key Agency
On behalf of: Scottish Environment Protection Agency (SEPA)

Supporting Info:
Email: Paul.Lewis@sepa.org.uk

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 SEPA neither objects to nor supports any of these sites. If any of them are taken forward in the new LDP, however, we consider they should be taken forward in the context set by the ER (Please see our response to the ER, our reference PCS/169988.) Sites briefs, incorporated in the City Plan, should embody the principles established in the ER and detail what will be necessary for applications for development to be acceptable. SEPA recently provided detailed information as background to the West Edinburgh Development Framework and we would refer you to this. Please see our advice to the project team of 17 January 2020, our reference PCS/169156. If this document is not readily accessible, please contact Paul Lewis at planning.se@sepa.org.uk quoting PCS/169156.

Choice 12 C

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

Short Response: No

Explanation

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 12 C

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

Short Response

Explanation

Choice 12 C

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

Short Response

Explanation

Choice 12 D

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

Short Response

Explanation

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

Supporting Info
Email

Choice **13 A**

We want to create a new policy that provides support for social enterprises, start-ups, culture and tourism, innovation and learning, and the low carbon sector, where there is a contribution to good growth for Edinburgh. Do you agree with this? - Yes / No

Short Response

Explanation

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

Supporting Info
Email

Choice 14 A

We want City Plan 2030 to support the best use of existing public transport infrastructure in West Edinburgh and accommodate the development of a mix of uses to support inclusive, sustainable growth. We will do this through ‘an area of search’ which allows a wide consideration of future uses within West Edinburgh without being tied to individual sites. Do you support this approach? - Yes / No

Short Response

Explanation SEPA does support this Choice, but we must express caution as large parts of the area identified as “West Edinburgh” is classed as flood plain and should be protected as part of a multifunctional green and blue network. We do not advise against all development in this area, but we do advise of the necessity for care and for interventions in the area needed to enable development. Of critical importance is the strategic drainage infrastructure that would form part of the multifunctional green and blue network to ensure neither flood risk to new development nor an increase in flood risk to other parts of the city. SEPA has long supported the concept of improvements for the Gogar Burn with regard to improved fish passage through the mitigation of fish barriers, improved physical condition whilst recognising the role of flood walls and protection of agricultural land etc. and the role these play with other measures to improve water quality. This should form part of the multifunctional green and blue network, improving the quality of the environment for the new communities to access and enjoy, which supports health and wellbeing of those communities. These are all objectives set out in the Second River Basin Management Plan for Scotland (2015-2021). We also consider that consideration of these measures while addressing existing and future flood risk is a potential double gain for the City’s people and businesses. This holistic approach is especially pertinent in light of Scottish Water no longer being able to accept surface water from new developments into the combined sewer. Surface water generated by development at Crosswinds and any other developments in the catchment of the Gogar will drain, eventually after SUDS treatment, into the Gogar Burn which is a highly modified unnatural channel lacking any of the features which give natural resilience at times of high or low flows. Restoration offers the best opportunity for the Gogar to be able to address the current pressures and be more resilient at times of low flow and without risk of further deterioration of the quality of the water. The Gogar Burn river corridor is a good example of where there is huge potential to provide a multifunctional green and blue network that maximises benefits for the planned new communities. SEPA is happy to work with Edinburgh Council to understand how this multifunctional green and blue network will be planned and implemented and support them in this.

Customer Ref: 01274 Response Ref: ANON-KU2U-GFF3-D
Name: Paul Lewis
Response Type: Key Agency
On behalf of: Scottish Environment Protection Agency (SEPA)

Supporting Info:
Email: Paul.Lewis@sepa.org.uk

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: SEPA has no particular view on this issue. Should this Choice be made, however, we would be content as long as any new uses are taken forward in the context of all other policies we support.

Customer Ref: 01274 Response Ref: ANON-KU2U-GFF3-D
Name: Paul Lewis
Response Type: Key Agency
On behalf of: Scottish Environment Protection Agency (SEPA)

Supporting Info:
Email: Paul.Lewis@sepa.org.uk

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 SEPA would support or not support this approach depending on a number of factors which would include alignment with the approach of Choices we have supported in this document. Our support would also depend on the nature of the alternative uses and their layout and design. Our support would only be possible if any development of this site addressed concerns SEPA has expressed consistently about the development in West Edinburgh. SEPA has long supported the concept of improvements for the Gogar Burn with regard to improved fish passage through the mitigation of fish barriers, improved physical condition whilst recognising the role of flood walls and protection of agricultural land etc. and the role these play with other measures to improve water quality. These are all objectives set out in the Second River Basin Management Plan for Scotland (2015-2021). We also consider that consideration of these measures while addressing existing and future flood risk is a potential double gain for the City’s people and businesses. This holistic approach is especially pertinent in light of Scottish Water no longer being able to accept surface water from new developments into the combined sewer. Surface water generated by development at Crosswinds and any other developments in the catchment of the Gogar will drain, eventually after SUDS treatment, into the Gogar Burn which is a highly modified unnatural channel lacking any of the features which give natural resilience at times of high or low flows. Restoration offers the best opportunity for the Gogar to be able to address the current pressure list, be more resilient at times of low flow and without risk of further deterioration of the quality of the water. As mentioned in SEPA’s response to the scope for the EIA for Crosswinds (our reference PCS/169384, 14 February 2020) we are reviewing the reports and surveys that identified the options for the diversion, including the route that is identified as GS7 in the current LDP. We are happy to share this information and discuss it at the earliest time. We are not ‘fixed’ on a particular option but are open to discussing the best option for all parties and interests. This includes the applicant, the water environment, adjacent land uses and land users, and aspirations for the diversion to be more than part of a functional drainage system; there is, for instance, the aspiration for it to add to amenity and opportunities for active travel. Indeed the GS7 route was designed to protect the now redundant runway and better options may now be available. The Gogar Burn river corridor is a good example of where there is huge potential to provide a multifunctional green and blue network that maximises benefits for the planned new communities. SEPA is happy to work with Edinburgh Council to understand how this multifunctional green and blue network will be planned and implemented and support them in this.

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **15 A**

We want to continue to use the national 'town centre first' approach. City Plan 2030 will protect and enhance the city centre as the regional core of south east Scotland providing shopping, commercial leisure, and entertainment and tourism activities. Do you agree with this? - Yes / No

Short Response

Explanation SEPA does support this Choice. Town centres are hubs for public transport and are easily accessible without private cars. Town centres, however, are often densely built up and can form canyons which trap emissions leading to poor air quality and health impacts on those who live and work in these areas. To address this, cars should be discouraged and public transport should be electrically charged. Opportunities to restore the water environment in combination with other benefits can be discussed further with SEPA.

Choice **15 B**

New shopping and leisure development will only be allowed within our town and local centres (including any new local centres) justified by the Commercial Needs study. Outwith local centres, small scale proposals will be permitted only in areas where there is evidence of a lack of food shopping within walking distance. Do you agree? - Yes / No

Short Response

Explanation SEPA agrees with this policy as it is consistent with the aim of reducing private car usage and promoting public transport and active travel.

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 15 C

We want to review our existing town and local centres including the potential for new identified centres and boundary changes where they support walking and cycling access to local services in outer areas, consistent with the outcomes of the City Mobility Plan. Do you agree? - Yes / No

Short Response

Explanation

Choice 15 D

We want to continue to prepare and update supplementary guidance for our town centres to adapt to changing retail patterns and trends, and ensure an appropriate balance of uses within our centres to maintain their vitality, viability and deliver good placemaking. Instead we could stop using supplementary guidance for town centres and set out guidance within the plan. Which approach do you support? - Yes / No

Short Response

Explanation

Choice 15 E

We want to support new hotel provision in local, town, commercial centres and other locations with good public transport access throughout Edinburgh. Do you agree with this approach? - Yes / No

Short Response

Explanation

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

Supporting Info
Email

Choice 15 G

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

Short Response

Explanation

Choice 16 A1

We want to continue to support office use at strategic office locations at Edinburgh Park/South Gyle, the International Business Gateway, Leith, the city centre, and in town and local centres. Do you agree? - Yes / No

Short Response

Explanation

Customer Ref: 01274 Response Ref: ANON-KU2U-GFF3-D
Name: Paul Lewis
Response Type: Key Agency
On behalf of: Scottish Environment Protection Agency (SEPA)

Supporting Info:
Email: Paul.Lewis@sepa.org.uk

Choice 16 A2

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

Short Response: Yes

Explanation: SEPA agrees with this choice as these areas are accessible by existing public transport and active travel routes.

Choice 16 A3

We want to strengthen the requirement within the city centre to provide significant office floorspace within major mixed-use developments. Do you agree? - Yes / No

Short Response: Not Answered

Explanation: SEPA has no comments on this issue.

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: SEPA has no comments on this issue.

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 A5

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

Short Response

Explanation

Choice 16 A5

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

Short Response

Explanation

Choice 16 B

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

Short Response

Explanation

Customer Ref: 01274 Response Ref: ANON-KU2U-GFF3-D
Name: Paul Lewis
Response Type: Key Agency
On behalf of: Scottish Environment Protection Agency (SEPA)

Supporting Info:
Email: Paul.Lewis@sepa.org.uk

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: I support a loss of

Explanation: SEPA supports a loss of office policy city-wide, in the context set out with existing office space provided as part of denser development.

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:

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:

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 E3

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

Short Response

Explanation

Choice 16 E4

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

Short Response

Explanation

Choice 16 E5

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

Short Response

Explanation

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

Supporting Info
Email

Choice 16 E6

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

Short Response

Explanation

Choice 16 E7

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

Short Response

Explanation

Choice 16 E8

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

Short Response

Explanation

Customer Ref: 01274 Response Ref: ANON-KU2U-GFF3-D
Name: Paul Lewis
Response Type: Key Agency
On behalf of: Scottish Environment Protection Agency (SEPA)

Supporting Info:
Email: Paul.Lewis@sepa.org.uk

Choice 16 EX

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

Short Response:

Explanation SEPA neither supports nor objects to any of these sites, but we refer you to our responses in this questionnaire and in our response to the ER (our reference PCS/169988. In addition, as the Plan develops we would like to provide advice on sites being taken forward, especially where there is a potential for industrial developments being regulated by SEPA or where housing and commercial or other industrial development is in proximity to SEPA regulated sites. We do consider, however, that there are opportunities to improve blue green infrastructure at all of these sites, perhaps some more than others. SEPA recognises they will be complex to develop and require partnership approaches to deliver but will be worth the effort because they will result in multi-benefit, enhanced natural capital, sustainable, resilient places.

Choice 16 F

We want to ensure new business space is provided as part of the redevelopment of urban sites and considered in Place Briefs for greenfield sites. We want to set out the amount expected to be re-provided, clearer criteria on what constitutes flexible business space, and how to deliver it, including the location on-site, and considering adjacent uses, servicing and visibility. Do you agree? - Yes / No

Short Response:

Explanation SEPA neither supports nor objects to this Choice, but we refer you to our responses in this questionnaire and in our response to the ER (our reference PCS/169988. In addition, as the Plan develops we would like to provide advice on sites being taken forward, especially where there is a potential for industrial developments being regulated by SEPA or where housing and commercial or other industrial development is in proximity to SEPA regulated sites.

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

Supporting Info
Email

Choice 16 G

We want to continue to protect industrial estates that are designated under our current policy on Employment Sites and Premises (Emp 8). Do you agree? - Yes / No

Short Response

Explanation SEPA neither supports nor objects to this Choice, but we refer you to our responses in this questionnaire and in our response to the ER (our reference PCS/169988. In addition, as the Plan develops we would like to provide advice on these sites, especially where there are activities or operations regulated by SEPA. This is an opportunity to address, and hopefully remedy, any existing or potential problems.

Choice 16 H

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

Short Response

Explanation SEPA supports this policy, albeit with a degree of caution. While these distribution hubs could mitigate against the number of delivery vehicles entering the city, this could be offset by the volume of private car trips generated by people collecting from distribution centres. Distribution centres would have to be located where there is ease of access by public transport. Possibly park and ride sites could incorporate goods distribution hubs.