

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 We support the creation of a new policy which will help to connect places, parks and greenspaces together. We consider the creation of a multi-functional green network across different scales is a necessary move for the City of Edinburgh and will be an important contribution to Edinburgh's response to the global climate emergency and biodiversity crisis (as defined by the IPBES report). It will also be key to health and well-being and achieving the aim of Edinburgh being 'a sustainable and healthy city'. At present, the green network as shown on page 8 of Choices for City Plan 2030 shows limited connections through the urban area. The same is true for active travel routes. We understand that Map 1 shows the green network as currently planned for in the current LDP. This could be considered to be a spatial representation of the current policy on Climate Adaptation and Greenspaces. We consider that this demonstrates the need to pursue the preferred approach of creating a new policy that supports a plan led approach to delivery for the green network, including the identification of retrofitting of green infrastructure and nature based solutions such as green roofs, community growing, rain gardens, etc. into existing urbanised areas. We consider that an essential role for the LDP will be to identify existing natural and open space assets, the areas for retrofitting or improvement, and new areas of open space and green networks to be planned for connection through development. A well planned green network policy should communicate a long term approach to what the network is and where it will be so that developers are able to plan for their sites to connect in and contribute to the wider green network and habitat enhancements. Site briefs should however provide specific information as to how development areas should connect in and how they should contribute to the wider green network, including where necessary, through appropriate use of off-site contributions. We note that while the Choices document emphasises the need to look beyond the city, key network connections across boundaries are not obvious at present. We consider that further work is needed to set out what this means for the plan and for delivery of this plan and longer term city growth. Scottish Planning Policy highlights that identifying existing network assets and avoiding fragmentation is an important principle of green network planning and these are helpful starting principles. Additionally, the work that SESplan undertook in partnership with SNH and all member authorities also sets out the early stage thinking on the city region's existing and future green / blue networks. We suggest that this work, along with the content of green network proposals in neighbouring plans, should be used as a starting point for further refinement of the green network and cross border connections in the next stage of the spatial plan. An additional key network resource that appears to be missing is the coast and the health and wellbeing benefits that it offers people. We strongly recommend that the coast is included as an integral part of the city-wide green and blue network. This should be done in reference to the National Marine Plan (statutory & adopted in 2015), which includes a number of policies relevant to land-use authorities, such as coastal access &

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Response Type Key Agency

On behalf of: Scottish Natural Heritage

infrastructure (for tourism or recreation), ports & harbours, landscape at the coast, coastal processes, erosion susceptibility and climate change adaptation at the coast.

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 We strongly support the proposed change to policy to require all development to include green and blue infrastructure. We consider this is a necessary component of a brownfield first and a higher density approach to development, which if delivered to appropriate standards will help provide healthy and liveable places for both people and nature. However, we consider there should be explanation of when this will be required. The approach to this proposed policy should be very clear on the requirements and be responsive to place and appropriate to it. We advise that as set out in the new Planning Act, positive effects for biodiversity should be set out in the plan. We suggest sufficient mechanisms or 'metrics' to support developers and planning officers to interpret what should be delivered at a site level should usefully be included and referenced in this policy. We also note that there are a couple of omissions in the example of what green and blue infrastructure is, including:

- Coast – as outlined in our response to Question 1A, the coastal zone is an important element of green and blue networks as well as a key asset of Edinburgh.
- Soils – healthy soils are an important component of green networks as well being ecosystems in their own right.

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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 We strongly support the proposal to identify and plan for suitable areas of the city to accommodate water management needs. A strategic, creative and pragmatic approach to city wide water management will be needed, and if suitably undertaken, this should have the potential to tie in well with development of the city wide green / blue network and enhancing biodiversity. The most recent modelling of sea level rise demonstrates future change that will pose significant water management issues. If Edinburgh is to manage water effectively this should include management of coastal water. The majority of urban Edinburgh and South Queensferry is protected by sea walls and it is essential that these walls are fit for purpose, including for their role in providing / protecting coastal access. We recognise that the LDP plays a role in this along with other plans and strategies and suggest that it would be most effective if accompanied by a Shoreline Management Plan. We consider place based approaches which guide towards well designed green / blue infrastructure will have the greatest potential to enhance city life, while also addressing the climate and nature emergencies. In this regard we would suggest the policy and planning approach is framed around both the need for water management but also the delivery of multiple benefits for people, place and nature. The subject of this question links strongly to question 1B. Living roofs and nature-based drainage solutions are part of wider green / blue networks and, in the case of living roofs, can provide important nodes for pollinators and species movement in the urban environment. In terms of climate change, in addition to managing water they also contribute towards managing urban heat island effect.

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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 We consider that clarity and reasoning will be an important aspect of any principles prepared to guide the development of open space. We support the principles for identification, protection and change of open space set out in paragraphs 224 and 230 of Scottish Planning Policy. At this stage, we understand that you are considering policy that would set the circumstances for development of poor quality or underused open space. In the absence of detail on what these circumstances may be, we highlight the need for strong justification for development and that poor maintenance and neglect should not in themselves be justification for development. We note that the Monitoring Report states that there are a number of homes in Edinburgh that do not meet the accessibility or quality standards set out in Open Space 2021. Viewed in its wider context, we consider that allowing the development of open space should be accompanied by principles requiring that these sites maintain and enhance connections into wider networks, including alternative open space provision. These connections would be essential if the overall significant positive effect for Biodiversity (Environmental Report, page 36) is to be achieved. We also note that Choice 4 identifies production of Place Briefs for development sites. When setting out in LDP2 those areas where there will be benefit in allowing development of open space, it should be clearly communicated as to what those benefits are and how they will be delivered (what, where and by whom). It should also be clarified that the Council will prepare Place Briefs for these sites.

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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

The Integrated Impact Assessment notes that “physical environmental conditions in Edinburgh are variable and therefore do not provide a consistent quality of environment adequate to ensure good standards of public health across all areas and communities.” This could clearly be related to greenspace accessibility and quality. The current Open Space Strategy for Edinburgh, Open Space 2021, requires that homes are within 800m of open spaces over 2ha.

We support the general intentions of this policy, and the principle of the introduction of a new “extra-large green space standard” recognising the multiple benefits for people and nature they may offer if designed, implemented and maintained appropriately. However, we consider there should be explanation of when delivery will be required. We also advise that there should be clear expression of the need for such green spaces to be safely connected within new and expanding areas of the city. In addition, we suggest that the proposed creation of these areas offers an opportunity to consider the typology of green spaces and parks in a broader sense. This would include the coast and promenades / beaches as part of the resource. These represent a significant area that is not generally accounted for in planning for green spaces. There are opportunities in some places to improve the quality and make existing large spaces function more effectively, including through creating and improving safe and green links to them. An example of this would be Seafield Park which at present occupies an area of just over 5ha. Access to this Park could be improved from Fillyside Road in addition to the important opportunities to design in access from site 383 (Seafield). It is also well sited to form part of a wider green network for Leith with Seafield Cemetery, Claremont Park and Leith Links. Consideration of these opportunities in site 383 could lead to formation of a strategic green network between Leith and Portobello which would also have the benefit of safe active travel and green / blue assets linking in existing natural assets to the waterfront / coast. We also suggest that the requirement to meet a new ‘extra-large greenspace standard’ could be aligned with delivery of other requirements such as allotments and provision for green and woodland burials. A higher density, more sustainable city should be one in which spaces are multi-functional, varied and interesting and which maximise opportunities for efficient management.

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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? - Yes / No

Short Response

Explanation We welcome and support the proposal to identify new sites for allotments and food growing. The proposal to identify these as part of new development and within open space is a positive element of the development of a wider green network, areas for biodiversity to flourish and a socially sustainable city. To meet these ambitions in line with a brownfield first approach to city growth, would seem to suggest that there will be an important role for the proposed place briefs to identify these specific sites for new allotments and food growing. Needless to say, given the other challenges of water management, biodiversity, recreation and higher density development a clear and well planned approach to securing delivery of these issues will be needed at the city wide level. We have suggested in response to question 1E that the proposed extra-large greenspaces could accommodate community food growing. In addition, there are a number of examples of integrating community growing into the wider urban area, including using streets, roof spaces and other spaces as well as the more traditional approaches of siting within allotments and open spaces. This can include on-street planters, growing within school grounds and so on, as demonstrated by Incredible Edible Network. We also consider that the expansion of community food growing could help to deliver the Million Tree City through increased provision of orchards and single fruit growing trees in appropriate spaces.

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

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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 We understand from other Council areas which host green and woodland burial sites that these are often situated within areas such as the green belt and Special Landscape Areas. There are obviously some benefits to this siting due to the quality of the wider environment.

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 Long-term maintenance and management measures are often overlooked but are essential to the delivery of successful outcomes. We therefore strongly support the proposal to revise existing policies to ensure that these arrangements are in place. It is perhaps stating the obvious but the requirements for long term maintenance and management should cover all aspects of green / blue infrastructure within proposed development sites – including paths, street trees, rain gardens, SUDS and all landscaped elements of individual sites. A strong policy approach and governance system is important here as too often these matters are not properly structured through the consenting process, with detrimental consequences to the quality and long term character of our places and biodiversity. If these measures are to be delivered successfully through factoring the long-term vision for the quality and maintenance of greenspaces should be made clear at the plan and allocation stage, providing clarity for application requirements. Other European cities such as Malmo, Utrecht and Munich have demonstrated that in densifying their cities, the quality of green infrastructure and open space, developed in a planned manner and appropriately maintained over the long term, is crucial for the creation of liveable cities and flourishing nature.

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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 We strongly welcome the intention to address both of these important issues. There is a clear relationship between this aspect of Choice 2 and the overall drive of Choice 1 to make Edinburgh a greener, more sustainable city. Questions 1A, 1B and 1C all point towards development of policy measures that will be key in tackling and adapting to climate change. We consider that it will be essential for LDP2 to set out a clearly defined set of principles for adaptation. Policy wording that promotes both a planned and design led approach to adaptation, both at the neighbourhood and individual site level, will be important to guide developers and to better establish the principles of good practice within the city.

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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 We are generally supportive of the proposal to revise policies on density. There are however landscape character, visual amenity and other natural heritage sensitivities within Edinburgh that contribute to its unique or special qualities. These qualities could be compromised if sites are developed inappropriately at higher density. We therefore offer caveats to our general support for this policy change and advise that the Place Briefs should identify and design appropriately for these issues in advance of finalising any proposed allocation. There are also other practical issues of how to deliver successful place-making at higher densities within the city. We consider that there needs to be a robust and clear approach to ensure that high quality greenspace, green / blue networks, improved public transport and active travel networks are also delivered along with any higher density approach. A clearly structured approach to the processes of site specific place-making, design and collaborative engagement will be necessary to the creation of a liveable city. We note that, while Choices for City Plan 2030 identifies likely densities and “vertical mix of uses” there is currently little information on what this change would look like, or how it will be designed or implemented. We therefore have some sense of caution on these matters and we await further information on these aspects of the plan. There is clearly a need for further consideration of how density can be delivered without adversely affecting the quality of the landscape setting and character of the city. This includes setting of landmarks which will have incidental importance to people as they stay or move through parts of the city as well as the more well-known, iconic landmarks.

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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 We fully support the proposal to revise policies to ensure delivery of active travel and connectivity links. However, we note that this question is supported by a reference to active travel as being “movement by foot or by bike”. While these form core modes of active travel, we consider that a broader view should be taken and that policies for design and layout should be reviewed on the basis of people using them to walk, cycle and wheel (mobility scooters, kick scooters, adapted wheelchairs and so on). We suggest that it will be essential to emphasise certain requirements and principles in both the next LDP and in the Mobility Plan. We suggest that, in addition to the above recommendation on wider scope of active travel, these are:

- Connected networks that are legible and safe to use, based on a hierarchy of off-road, segregated or shared infrastructure. Ideally, provision would be within a green / blue edged corridor providing an urban habitat network that links to open / greenspaces as well as other destinations of work, shopping, home, leisure etc.
- Legible, direct links that do not require people using them to travel out of their way in order to join the wider network from new development sites.

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 We support this. It will be important that all development within the city helps deliver high quality open space and public realm, including street trees, as well as improvements to active travel and public transport infrastructure.

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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

Choice **4 A**

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

Short Response

Explanation We strongly support the proposal to prepare Place Briefs for all sites to be allocated in the plan. Given the cross cutting nature of the issues raised by the plan, we consider such briefs are essential to delivering on the preferred strategy and policy approach. While supporting this proposal we note there is no indication of how and when Place Briefs will be delivered. We suggest further information is necessary and that effort is made to deliver the Place Briefs before allocations are finalised. The proposed change is that key elements of design, layout and transport, education and healthcare infrastructure will be identified. If supported by the identification of a consistent process for community and stakeholder engagement, these should be core topics for all Place Briefs. We recommend that for larger sites the information produced should be more detailed, with a focus on development frameworks and draft masterplans, necessary to co-ordinate delivery of more complex place-making within any proposed large allocation. There should also be higher levels of engagement proposed for larger and more complex sites, perhaps through design charrettes and other place-making events. This is due to the potential impacts and the planning opportunities of these sites being greater. We have considerable experience of working with planning authorities to prepare Place Briefs and would welcome the opportunity to discuss how we might provide support to you.

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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

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

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

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Choice **5 C**

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

Short Response

Explanation

Choice **5 D1**

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

Short Response

Explanation

Choice **5 D2**

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

Short Response

Explanation

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Supporting Info

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Response Type Key Agency

On behalf of: Scottish Natural Heritage

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 Not Answered

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 We support this as part of an overall move to deliver a more integrated transport network based on the National Transport Strategy hierarchy with walking as the primary mode that is undertaken and planned for.

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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

Explanation We generally agree that Place Briefs should include information on trips by walking, cycling and public transport as a key element of successful places. However, at present we are not clear on the role of Place Briefs in setting targets although we consider that these may arise from the principles set by the briefs. We do not consider that parking levels are a matter for us to comment on in detail but suggest that if existing parking levels are being reviewed, alternative uses for this space including mobility hubs, bike parking and retrofitting green / blue infrastructure should be considered as part of place-making and improving sense of place.

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

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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

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

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Choice **7 D**

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

Short Response

Explanation We agree with the proposals to support the city’s Park & Ride sites. However, we caveat this support as we consider that some changes to the provision are needed if these sites are to contribute to the future vision of the city. The existing Park & Ride sites are single function only and have no real sense of place or integration. We consider that the role of such sites in a transformed city region is to be part of places, with workplaces and high density living alongside them as has been successfully delivered in North America and Europe. We also consider that a broader concept of what a Park & Ride site is should be developed. Rather than a place to drive to and swap to public transport, these places should support multiple forms of transport and be focused on arriving and choosing between a range of modes rather than driving and parking before switching to a bus or tram. To achieve these changes we recommend a design-led approach that treats these sites as places, including with connecting and integrated green infrastructure. The STPR2 Case for Change reports include brief discussion of the importance of sustainable travel provision / options for visitors. This should be a key issue for Edinburgh, particularly if the potential for attractions to be more distributed throughout the city is delivered. A networked system of Choose & Ride sites could be integral to achieving this. Active travel gets good coverage in the Edinburgh & South East Scotland Case for Change report and we suggest that some of the messages from there will be relevant to achieving the changes proposed for Edinburgh. The Transport Planning Objectives (both national and regional) set out in Table 10 in the Case for Change report cover a wider range of issues – many of them linked to land-use planning. We consider that many of the principles set out in the Choices for City Plan 2030 document encompass the objectives of the Case for Change but nevertheless encourage you to ensure that it informs preparation of the Proposed Plan.

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Choice **8 A**

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

Short Response

Explanation We generally agree with the proposal to update policy and develop new criteria for identifying new routes for the cycle and footpath network. We consider that the criteria should be informed by content of the STPR2 Case for Change report, based on:
• Which routes are needed to help address the key issues in the Case for Change report?
• Are the issues in the Case for Change report covered in the criteria used in the MIR?
There should also be criteria based on how green routes are or could be made when selecting them:
• Routes that take walkers, cyclists and wheelers off the road.
• Routes that take users to and through green / blue spaces, including the coast, Country Parks, Regional Park, etc.
• Routes that address gaps and missing links in the existing green / blue network.
Routes should also be considered in the widest sense, including regional and inter-region routes that connect cross boundary to settlements / developments but also link to the local networks. These local networks should in turn be connected across the city and made up of paths, roads, footways, bus stops, tram stops, train stations and Choose & Ride hubs (EV, ebike and bike).

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

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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 We agree with the proposed routes identified in Question 8B, however we suggest that as the focus is active travel some key routes are missing. In particular, we consider that the proposed approach in the Proposed Plan should show / safeguard / help deliver cross-boundary routes as identified in SEStran's Strategic Active Travel Network study. We highlight the importance of planning a network and safeguarding strategic active travel connections during this plan period. We note that climate change and cultural factors, including social distancing and the likely rise in e-bike use, could substantially influence behavior and use. We note e-bikes are a significant contributing factor in modal shift elsewhere in Europe, with increasing levels of e-bike ownership and longer distances travelled and this learning should influence the planning strategy for the city region. In addition to the identified routes we suggest the following key active travel links identified in SESplan: • Edinburgh city orbital active travel route as a necessary component of modal shift in localised cross boundary journeys and for longer peripheral commuting • A7 active travel super highway, connecting with planned improvements in Midlothian • Completion of A8 link, including future links via International Business Gateway • SEStran planned Portobello to Musselburgh connection

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

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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

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

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

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Choice 10 B

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

Short Response

Explanation

Choice 10 C

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

Short Response

Explanation

Choice 11 A

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

Short Response

Explanation

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Response Type: Key Agency
On behalf of: Scottish Natural Heritage

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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

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Choice 12 A

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

Short Response Option 1 (Council/

Explanation

We strongly support Option 1 as the preferred option and the one most likely to deliver a more sustainable city for people and nature. We also consider that Option 1 aligns most clearly with other Council strategies such as City Centre Transformation and the Mobility Plan and is therefore more likely than Options 2 and 3 to aid their effective delivery. However, while we support Option 1, we consider that there will need to be further consideration as to how the ambition of delivering homes and other aspects of mixed use development, in the most sustainable way, will be achieved. An overarching requirement should be that there is a strong focus on the creation of liveable neighbourhoods that are linked by good quality multi-functional green / blue networks and which have access to goods and services at walkable and cyclable distances. We consider that Place Briefs which are clear on the site specific planning issues and the urban design / place-making aspects of sites are integral to the successful delivery of the preferred strategy approach. At this moment it is unclear as to what the Place Briefs will consist of and how they will be resourced and produced. Clarity on these issues, and information regarding when they will be consulted on will be important to the communication and delivery of the preferred approach. We are nonetheless supportive of their production and consider the Place Briefs, if undertaken with suitable expertise and time input, will be of high importance in delivering the high quality development and liveable neighbourhoods. We have offered our support for preparation of Place Briefs and, in meeting with the Council on 05 February, suggested that we can offer two-tier support: • We will work with the Council and others to establish general principles that will apply to all Place Briefs; • We will work with the Council and others to shape Place Briefs for strategic sites, particularly where these offer significant opportunities or constraints for natural heritage. Events at the time of writing this response with the COVID 19 crisis, highlight the importance of planning for a city that is resource-efficient, with better connected active travel, accessible open space and high quality public realm. We consider that Option 1's focus on density, reduced need to travel and reduced use of greenfield land for development offers the best opportunity to create a resilient city that can respond to and accommodate future crises, including the effects of climate change. However, we again suggest that further information is needed as to how these positive aspects of sustainability and place-making will be delivered through the preferred approach. We highlight our support for preferred Option 1, and as less sustainable approaches to delivering the spatial strategy we do not support Options 2 and 3. Our understanding of Option 2 is that to deliver housing through market led release of greenfield land would require extensive release of green belt land to achieve required numbers, even at the proposed minimum density of 65 dwellings / ha. We also note that it is unlikely that the required delivery rate could be achieved, further reducing the likelihood of Edinburgh being a sustainable, resilient city. This option is likely to have the highest impact on natural heritage interests especially in the context of the wider setting of the City. If Option 2 were to become the preferred strategy in the Proposed Plan we consider that the most effective way to make this option resilient would be to base it on high density development that is focused on existing or proposed public transport and active travel networks. Landscape frameworks would be needed and the appropriate use of on-site green / blue infrastructure and connecting the green / blue network will also need to be set out in Place Briefs. The focus of any delivery based on a greenfield approach should be high density development around transport hubs with the same principles of liveable neighbourhoods as those we have highlighted in response to Option 1. Sites such as those at Kirkliston should not be progressed as part of such a strategy unless it is possible to

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01644

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support development through expansion of the public transport and active travel networks.If Option 3 were to become the preferred strategy in the Proposed Plan we consider that the most effective way to make this option resilient would be to base it as proposed on “significantly more housing in the existing urban area”, with greenfield release only occurring where there are existing or proposed public transport and active travel networks to support sustainable travel.

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

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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

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

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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

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

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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

Choice **12 BX**

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

Short Response

Explanation

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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

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

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Choice **12 D**

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

Short Response

Explanation

Choice **13 A**

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

Short Response

Explanation

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Choice 14 A

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

Short Response

Explanation We fully support the proposed approach for West Edinburgh and consider that there is a need to set out a plan and design-led approach to long term growth of this part of the city. We support approaches which will establish neighbourhood and place identity with higher densities of development and the creation of liveable neighbourhoods around public transport and active travel hubs, nodes and routes. Safeguarding and utilising existing natural assets in a planned approach to development of strategic, interconnected and multi-functional green / blue networks is an essential part of delivering long term sustainable city growth in this area.

Choice 14 B

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

Short Response

Explanation As set out in our response to Question 12B, we note that the greenfield sites set out in Choice 12 are not part of the preferred option. We therefore do not support their allocation and, in alignment with that, we do not agree with the change in safeguard of this site.

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Choice 14 C

We want City Plan 2030 to allocate the Airport's contingency runway, the "crosswinds runway" for the development of alternative uses next to the Edinburgh Gateway interchange. Do you agree with this approach? - Yes / No

Short Response

Explanation As set out in our response to Question 12A, we support the brownfield first approach of the preferred option and agree with the approach to Crosswinds as it fits with the preferred strategy. However, there are caveats to our support of such sites, including requirements that would ensure delivery of resilient, liveable neighbourhoods. These are set out in more detail in our response to the SEA consultation.

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

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

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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: 01644 Response Ref: ANON-KU2U-GWF6-1
Name: Vivienne Gray
Response Type: Key Agency
On behalf of: Scottish Natural Heritage

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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:

Choice 16 A2

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

Short Response:

Explanation:

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Choice **16 A3**

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

Short Response

Explanation

Choice **16 A4**

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

Short Response

Explanation

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

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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

Choice **16 C**

We want to introduce a loss of office policy to retain accessible office accommodation. This would not permit the redevelopment of office buildings other than for office use, unless existing office space is provided as part of denser development. This would apply across the city to recognise that office locations outwith the city centre and strategic office locations are important in meeting the needs of the mid-market. Or we could Introduce a 'loss of office' policy only in the city centre. - Yes / No

Short Response

Explanation

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Choice 16 E1

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

Short Response

Explanation

Choice 16 E2

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

Short Response

Explanation

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

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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

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

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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

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 We agree with the proposal to identify modern business and industrial sites at the locations identified. As set out in our response to Question 2B, we consider that there needs to be a robust and clear approach to ensure that high quality greenspace, green / blue networks, improved public transport and active travel networks are also delivered along with any higher density approach. A clearly structured approach to the processes of site specific place-making, design and collaborative engagement will be necessary for the creation of a liveable city. To achieve this, the proposed business and industrial sites should either have Place Briefs prepared specifically for them or, if part of a larger mixed site, be clearly included in the Place Brief for those.

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Choice 16 F

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

Short Response

Explanation

Choice 16 G

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

Short Response

Explanation

Customer Ref: 01644 Response Ref: ANON-KU2U-GWF6-1
Name: Vivienne Gray
Response Type: Key Agency
On behalf of: Scottish Natural Heritage

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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 As set out in our response to Question 12A, we consider that the release of sites should be based on high density development around transport hubs with integrated green / blue networks and green / blue infrastructure to support. On that basis, we agree with the proposal to prepare policy that provides criteria for locations that would support city-wide and neighbourhood goods distribution hubs.