

**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**

**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**

**Explanation**

Customer Ref: 00485 Response Ref: ANON-KU2U-GWRU-C

Supporting Info Yes

Name Don Nicholass-McKee

Email edinburghgroup@livingstreets.org.uk

Response Type Organisation / Public Agency

On behalf of: Living Streets Edinburgh Group

Choice 1 C

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

Short Response Not Answered

Explanation See attached response from Living Streets Edinburgh Group.

Choice 1 D

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

Short Response Not Answered

Explanation See attached response from Living Streets Edinburgh Group.

Choice 1 E

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

Short Response Not Answered

Explanation See attached response from Living Streets Edinburgh Group.

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

Customer Ref: 00485 Response Ref: ANON-KU2U-GWRU-C

Supporting Info Yes

Name Don Nicholass-McKee

Email edinburghgroup@livingstreets.org.uk

Response Type Organisation / Public Agency

On behalf of: Living Streets Edinburgh Group

Choice 1 H

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

Short Response Not Answered

Explanation See attached response from Living Streets Edinburgh Group.

Choice 2 A

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

Short Response Not Answered

Explanation See attached response from Living Streets Edinburgh Group.

Choice 2 B

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

Short Response Not Answered

Explanation See attached response from Living Streets Edinburgh Group.

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

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

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

Supporting Info

Email

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

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

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

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



Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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 See attached response from Living Streets Edinburgh Group. Again support principle of what you are trying to achieve, but you must go for requirements, not targets, and ensure all development is car free.

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 See attached response from Living Streets Edinburgh Group. Radical measures are required to ensure compliance with, and delivery of, the movement hierarchy as set out in Scottish Planning Policy and the National Transport Strategy. Any other approach is contrary to Scottish Government policy. Consequently, you must go for no parking provision other than for disabled, servicing and essential visitors. This must be done in tandem with phasing out on-street parking.

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

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 See attached response from Living Streets Edinburgh Group. The phrase "active travel" includes walking and cycling, but the Council consistently interprets it as predominantly cycling and budgets accordingly. The upload facility below is another example - cycling not walking! Walking has negligible investment, yet it is what we are all designed to do regardless of other travel modes we may use. We support new strategic walking routes, but this must be in addition to enhancing walking provision throughout the city - life after COVID-19 will have to reflect that, other cities such as Milan have already recognised this. We have uploaded our consultation response in the cycle route section below as so far there has been no obvious place for it.

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

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

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

Customer Ref: 00485      Response Ref: ANON-KU2U-GWRU-C  
Name: Don Nicholass-McKee  
Response Type: Organisation / Public Agency  
On behalf of: Living Streets Edinburgh Group

Supporting Info: Yes

Email: edinburghgroup@livingstreets.org.uk

Choice 11 B

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

Short Response: Not Answered

Explanation: See attached response from Living Streets Edinburgh Group.

Choice 12 A

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

Short Response: Option 1 (Council/

Explanation: See attached response from Living Streets Edinburgh Group.

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:

Supporting Info

Name

Email

Response Type

On behalf of:

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:

Supporting Info

Name

Email

Response Type

On behalf of:

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:

Supporting Info

Name

Email

Response Type

On behalf of:

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:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

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

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

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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



Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

Choice 16 A5

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

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

See attached response from Living Streets Edinburgh Group.

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

See attached response from Living Streets Edinburgh Group.

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

## Choices for City Plan 2030

### Living Streets Edinburgh Group Comments

#### Introduction

Living Streets Edinburgh Group (LSEG) is the local voluntary arm of the national charity, Living Streets, which campaigns for better conditions for 'everyday walking'. In LSEG our key aim is to promote walking (including "wheeling" (on wheelchairs) and similar pedestrian mobility) as a safe, easy and enjoyable way of getting around the city.

For LSEG the focus for City Plan 2030 has to be delivering for people. The purpose of planning is to manage the development and use of land in the long-term public interest, which is commonly accepted as being the welfare or well-being of the general public. In other words, to provide for people, a species designed to walk on 2 legs, it is our default mode of transport. Walking is by far the most common and universal travel mode, forming an essential part of many journey chains by bus, train, car, bike etc, as well as 'walk-only' journeys.

Yet we have a planning system that for too long has bent over backwards to prioritise and accommodate motorized transport, principally the private car. Finally, this is now widely accepted as not being in the long-term public interest. So there is an opportunity for City Plan 2030 to press the reset button and actually plan for the long-term public interest, putting people first.

As well as reversing a longstanding failure of planning as a discipline, this will actually result in a local development plan that complies with Scottish Government policy. Walking is unambiguously top of both the 'movement hierarchy' as laid down in Scottish Planning Policy<sup>i</sup> and the 'Sustainable Travel

Hierarchy' in the new National Transport Strategy 2 . However, while lip service is often paid to the theoretical primacy of walking, it is rarely put into practice and when there is mention, walking is often conflated with cycling.

Despite being Scottish Government policy, Choices for City Plan 2030 regrettably makes no mention whatsoever of the movement hierarchy or the Sustainable Travel Hierarchy – this is an unforgivable omission, which, unless addressed, must bring into question the Council's commitment to everyday walking and adherence to national policy.

City Plan 2030 must work in tandem with the City Mobility Plan and deliver the principles of the movement hierarchy across the whole city applying them to established streets and places as well as new developments. Successful places are those which work for people, not just vehicles, so comprehensive delivery is required across the city to get an integrated package working for the whole community, not only those in new developments. This is critical in order to address the past failure of the planning system.

The consultation started before the current emergency, so in preparing City Plan 2030 it would be an abdication of responsibility for the Council not to take account of relevant lessons learnt. It has been demonstrated that many jobs can be carried out from home, it is therefore perfectly feasible that employers may build on this experience and change working patterns as there will be cost savings, enhanced efficiency and, as a by-product, less pressure on transport infrastructure. It is abundantly obvious to all that current traffic reduction has meant the streets have been more pleasant places to inhabit and this, combined with the likelihood of long term social distancing requirements, means that more space is needed for walking. It is therefore beholden on the Council to grasp reality, to actively encourage far more home working, to reconsider where new housing should be located, to seriously restrict



private vehicle movements and to invest much more in walking and public transport infrastructure. There may also be reduced demand for new office space and the possibility that some existing office space could be converted to housing or other suitable community uses. All of this has to be carefully considered and assumptions re-evaluated. Living Streets Edinburgh Group would like to be part of this process.

## Detailed Comments

### Introduction

p3 - Support the 4 aims for 2030, particularly “a sustainable city” and “a city where you don’t need a car to move around”, but this obviously requires the services, infrastructure, development locations and quality of environment to allow it to happen. The Choices for City Plan 2030

p5 - Generally support the choices under the aims, but need to go much further:

- No.1 should be revised to “Making Edinburgh a sustainable, active and connected city *based firmly on the movement hierarchy as set out in para 273 of Scottish Planning Policy*”.
- No.2 should be revised to “Improving the quality, density and accessibility of development *and ensuring that all new development in the city centre is car free apart from essential parking provision for disabled, visitors and car clubs. This policy shall apply across the whole city by the end of the plan period.*”
- No.6 should be revised to “Creating places *and enhancing existing streets and places* to focus on people not cars”.
- No.7 should be revised to “Supporting the reduction in car use in Edinburgh *to those which are essential*”.

- No.8 should be revised to “Delivering new walking and cycling routes *and enhancing existing streets and paths to ensure that walking has priority*”.
- No.12 should be revised to “Building our new homes and infrastructure *in locations and with layouts where walking is the most viable means of movement, including good routes to a variety of public transport options.*”

### Choice 2 - Improving the quality, density and accessibility of development

p9 - Support the thrust of the changes, strongly agree with increased density objective in “B”, but “A” should include specific reference to car free developments and “C” should refer to the movement hierarchy in para 273 of Scottish Planning Policy as well as the six qualities of successful places.

#### A city where you don’t need to own a car to move around

p13 - Strongly support the objective, but if it is intended that you don’t need a car to move around, then there should be specific reference that new developments will be car free and no provision made for parking other than disabled, servicing and essential visitors.

### Choice 5 - Delivering Community Infrastructure

p15/16 - Transport Infrastructure section should make it clear that infrastructure will be provided in line with the movement hierarchy as set out in Scottish Planning Policy and the National Transport Strategy. Whilst specific walking routes are welcome, there also has to be reference to improvements to the fabric and management of all streets in the city, new and existing, to accommodate walking as the priority means of movement. Within this context “A” should have specific reference to walking infrastructure.

### Choice 6 - Creating places that focus on people, not cars

p18 – Strongly support Choice 6 *Creating places that focus on people, not cars*. In the supporting text there has to be specific reference to the movement hierarchy in Scottish Planning Policy and the National Transport Strategy, with the movement hierarchy set out in the correct order of priority with walking first. There should also be reference to enhancing established places across the city to reflect the same priorities so that benefits will be enjoyed by the entire community, not just those in new developments. The target referred to in “A” should be zero car use other than provision for disabled, servicing and essential visitors. If new development cannot deliver this, then it should not be permitted. Within this context “B” needs to be reworded to delete reference to *appropriate parking levels*, you must not use phrases that allow wriggle room for either developers or decision makers.

### Choice 7 - Supporting the reduction in car use in Edinburgh

p19 – Support Choice 7 but it has to be strengthened so suggest rewording it to read *“Help to deliver significant reduction in car use in Edinburgh”*. Proposed changes “A”, “B” and “C” require revision to make it clear that there will be no provision in any development for car parking other than for disabled, servicing and essential visitors. This must be in tandem with phasing out of on street parking across the city. A start should be made by defining a central area car-free zone, within which no new residential parking permits would be issued.

### Choice 8 - Delivering new walking and cycling routes

p21 – Support Choice 8, but it has to be strengthened so suggest rewording it to read *“Delivering new walking and cycling routes and enhancing existing provision for walking throughout the city”*. The Plan needs to recognise that for most people on foot, their "walking network" consists of the pavements around their home, place of work or education. The

emphasis on new cycle routes is disproportionate and "delivering new walking and cycle routes" is much less important than improving existing ones: this means improving pavements, widening them, more road crossings, traffic calming, etc. S75 opportunities. In recognition of the importance of everyday walking this should be reflected in the proposed changes and there should be specific reference to the movement hierarchy as set out in Scottish Planning Policy and the National Transport Strategy.

It is appreciated that the provision and enhancement of walking infrastructure has a cost attached. This should be secured via revisions to the Council's policy and guidance on developer contributions. The existing supplementary guidance ignores walking, contrary to the Scottish Government hierarchy. Delivery of Choices 6, 7 and 8 will require significant investment which must come from developers as part of individual developments and/or via developer contributions in Section 75 Planning Obligations. Higher density developments with less car parking and fewer contributions towards traditional road schemes will assist with delivery for walking.

#### Choice 10 - Creating sustainable communities

p26 - Revise para 3 in text box to read "*reduce* the amount and type of student housing..."

#### Choice 12 - Building our new homes and infrastructure

p28 – Point "C" in the text box under Choice 12 should be revised to read "*Where we will deliver the homes in the most sustainable way to conform with the movement hierarchy as set out in Scottish Planning Policy and the National Transport Strategy*".

p30– Strongly support the Council in preferring Option1 Delivery within the Urban Area as it is the only option that can provide for walking in accordance with the movement hierarchy

as well as helping to deliver on wider sustainability objectives.

p31 – Having set out its preferred Option, it is disappointing that the Council chooses to focus on the difficulties in delivering it, rather than the benefits that will accrue if it is delivered. Delivery in accordance with the movement hierarchy as set out in Scottish Planning Policy and the National Transport Strategy is only possible with this Option. Any other option will fail to comply with Scottish Planning Policy. The Council must embrace the same spirit that lies behind the City Centre Transformation project, and be resolute, bold and focused beyond the short term.

p32 – If the Council pursues car free developments and is imaginative with design, layout and density, the available space will generate more than the 17600 new housing units quoted.

p35-46 – The options set out in Maps 9-14 and supporting text will fail to deliver in accordance with the movement hierarchy as set out in Scottish Planning Policy and the National Transport Strategy, and most certainly lead to an increase in car use which is contrary to national planning policy and the stated thrust of the City Plan process.

#### Choice 15 - Protecting our City Centre, Town and Local Centres

p54 – Fully support Choice 15 and note reference to active travel and walking distance with regard to new shops outwith centres. However, the best way of protecting our existing centres is to acknowledge that they are primarily places for people, so policy has to be led by the movement hierarchy as set out in Scottish Planning Policy and the National Transport Strategy. Is there evidence to support the new hotel provision proposed in “E” given the identified need for more permanent housing? There is a need for more city centre homes as well as more housing across the city and the increased density proposals will help to deliver this, but it has to be prioritised over hotel and Air BnB type provision. The proposed changes

need to be reworded to reflect this and introduce proposals for established centres to prioritise people and walking.

### Choice 16 - Delivering Office, Business and Industry Floorspace

p56 & 59 – Choice 16 should make it clear that office, business and industry floorspace will only be provided in locations where it can be easily accessed by public transport and where there is good infrastructure for walking and cycling. It should be made clear that onsite parking will be restricted to that required for disabled, servicing and essential visitors. In addition to minimising vehicle movements, this will allow more efficient use of land and free up space for enhanced green infrastructure. As stated in our initial comments, there also has to be recognition that more provision should be made for homeworking, in new and existing housing – perhaps one positive to come out of the current COVID-19 crisis.

The plan should make provision for developing a new role for out of town retail and parking, through conversion to higher density, mixed used (especially residential) focused around public transport interchange hubs.

### **Living Streets Edinburgh Group**

April 2020

## Notes/references

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Paragraph 273 of *Scottish Planning Policy* (2014) states: 'The spatial strategies set out in plans should support development in locations that allow walkable access to local amenities and are also accessible by cycling and public transport. Plans should identify active travel networks and promote opportunities for travel by more sustainable modes in the following order of priority: walking, cycling, public transport, cars. The aim is to promote development which maximises the extent to which its travel demands are met first through walking, then cycling, then public transport and finally through use of private cars. Plans should facilitate integration between transport modes.'

<https://www.gov.scot/publications/scottish-planning-policy/>

ii

The 2020 National Transport Strategy 2 (NTS2) places walking at the top of the 'Sustainable Travel Hierarchy', followed by cycling, public transport, taxis and shared transport and the private car. <https://www.transport.gov.scot/media/47052/national-transport-strategy.pdf>