

Customer Ref: 01402      Response Ref: ANON-KU2U-GPMS-X

Name: Michael Birch

Response Type: Residents Organisation

On behalf of: Regent, Royal, Carlton Terraces and Mews Association

Supporting Info:

Email: rrcta@live.co.uk

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

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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

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

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

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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

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

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Choice 1 H

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

Short Response

Explanation

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

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

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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 Active travel and connectivity ( by public transport) to other parts of the development and to the wider city should be included in any development planning. Sites should not be developed which continue to rely on the use of cars to connect to schools, shops and community facilities.

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 Do not agree with the inclusion of drying space as a particular requirement.

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 This should be aligned with Scottish government policy to ensure a consistent country wide approach to such standards. Clearer guidance is required on the acceptable modifications that can be allowed to older listed properties in the city centre that would enhance their environmental performance including double glazing, solar panels and new heating systems.

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Choice      4   A

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

Short Response: Yes

Explanation: The critical issue here is when and how local communities will be involved so that they can have a genuine input to the planning process. Further details is required in the final LDP.

Choice      4   B

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

Short Response: Not Answered

Explanation: Community Councils should be involved in devising the methodology in conjunction with other community groups.

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

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

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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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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: No

Explanation: Why is there a need for change - this is not clear.

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Choice **6 A**

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

Short Response

**Explanation** By simply focussing on the need to reduce the usage of cars rather than all vehicles, the proposed Plan will not be able to fully meet its stated goal to create “places for people”. As well as cars, the traffic in Edinburgh is made up of a large number of commercial vehicles servicing the local businesses and residential properties as well as public service vehicles including buses, tourist coaches and taxis. These vehicles add considerably to the congestion in the City especially the city centre and to the levels of atmospheric emissions resulting in unacceptable levels of pollution. The LDP should support the Council’s plans for reducing atmospheric emissions and in particular the City Centre and City-Wide Low Emission Zones (LEZ). It is essential that the LEZ proposals should be more ambitious and extend Euro 5 levels of protection beyond the central business and tourism district. The expected increase in working from home following the pandemic will now make this approach much easier to achieve. This is an opportunity that should not be missed. The RRCTMA objected to the Council’s LEZ proposal (July 2019) asking that the proposed “central” zone be widened to include Regent Road, as it would otherwise become an “alternate route” for non-compliant traffic, which can only increase pollution in residential areas adjacent to the city centre. We ask again that this street be included in the central LEZ zone. The use of electric vehicles should be encouraged especially within the city centre area. As well as providing increased charging infrastructure to allow residents to convert to electric vehicles, the Council should use its licencing powers to require electric taxis and delivery vehicles in the City. While we support Active Travel that promotes healthy communities we believe that any travel strategy must take account of the needs of residents and visitors with limited mobility. Otherwise the proposed hierarchy of travel options that prioritises walking and cycling may disadvantage disabled people, their unpaid carers and paid support staff. We are also concerned that public transport is not sufficiently accessible at present, let alone for a growing older population. It is important that any transportation hubs are accessible by all users.

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Choice **6 B**

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

Short Response

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

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Choice **7 A**

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

Short Response

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

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

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

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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**

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

The use of electric vehicles should be encouraged especially within the city centre area. As well as providing increased charging infrastructure to allow residents to convert to electric vehicles, the Council should use its licencing powers to require electric taxis and delivery vehicles in the City. While we support Active Travel that promotes healthy communities we believe that any travel strategy must take account of the needs of residents and visitors with limited mobility. Otherwise the proposed hierarchy of travel options that prioritises walking and cycling may disadvantage disabled people, their unpaid carers and paid support staff. We are also concerned that public transport is not sufficiently accessible at present, let alone for a growing older population. It is important that any transportation hubs are accessible by all users.

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

Choice **8 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

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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

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

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** The rise of and negative effects of unlawful short term lets on Edinburgh and its resident population has been widely recognised. We do not believe that there would be any value in designating any single community, or parts of Edinburgh as short term let control areas, as it will only move this activity in other areas, negatively affecting those local communities disproportionately. If we have learned nothing else from this pandemic, it is the importance of having residents for strong and cohesive communities, across Edinburgh. We would advocate for all of Edinburgh to be a single short term let control area, with the same criteria to judge suitability for any change of use or for residents who want to short term let their own property in full, or in part. What may be more useful is a consultation for the residents of Edinburgh on what the licensing and enforcement of short term letting should be. PLACE Edinburgh has put forward a licensing proposal, which could be used as a basis for a consultation, as it has been generated from existing case law, learning from licensing used elsewhere in the world, and the lived expertise of Edinburgh residents who have experienced living next to short term lets across the city. The proposal has been refined from feedback received online and through face to face meetings with communities in Edinburgh



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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** There should always be a presumption against a Change of Use from residential property to commercial use as Edinburgh has a growing population, with a homelessness issue. The cost of owning or renting a home has increased higher than income and may affect the ability for younger people to remain within their communities if they wish to leave the family home, and for a healthy diversity within communities. The loss of certain local retail, commercial and community facilities can have a very detrimental impact on the communities that they are intended to serve. We have seen in the city centre the loss of many businesses that have provided essential services and employment to local residents as many have been converted into tourist-focussed enterprises. If the city centre is to remain a place that people want to live in a sustainable manner it is important that the LDP provides protection against uncontrolled change of use of such local businesses.

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

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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

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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** Although we would generally support an increase in provision of affordable housing and understanding that the current policy (at 25%) has been in place for many years, it is clear that this question cannot be answered without being aware of possible negative consequences – in terms of impacting the level of new housing builds. It is also a significant increase above the current ‘requirement’. We are also not aware of any analysis of the effect of this proposed increase and whether this would actually increase the supply of truly affordable housing. We believe that an alternative approach is to focus on ensuring that, firstly, the 25% affordable housing requirement is delivered and secondly, and more importantly, that this ‘affordable’ housing is actually affordable. It has been stated that there is particular demand for social rented housing in Edinburgh – with Social rented homes accounting for only 14% of the housing stock in Edinburgh, compared to the Scottish average of 23%. Hence, we believe that the focus should primarily be on an improved definition of affordable housing.

Choice **11 B**

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

Short Response

**Explanation**

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Choice      12   A

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

Short Response: Option 3 (Blended)

Explanation: we are concerned that there is no mentions of the residential component to the city centre. Edinburgh is unusual in having so many people living in its centre. Their presence directly contributes to the life of the City centre unlike other cities where the centres are empty once the commuters have returned to their homes in the suburbs. It is vital that all decisions regarding this core area take cognisance of the impact on and for residents, to ensure they enhance rather than detract from daily life in this thriving city centre. We are surprised that there is no mention of the specific policies which apply to the city centre with regard to its status as a World Heritage Site and as a Conservation Area and the responsibilities therein.

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

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



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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** We question whether a policy which supports increasing tourism in a city already suffering from over tourism is helpful in creating a balanced economy or is sustainable given the increasing negative impacts of over tourism. A policy which supports social enterprises, start-ups, culture, innovation, learning and the low carbon sector is welcome. 'Good growth' must attract start-ups, individuals and businesses to live and work in Edinburgh – and retain those already living and working here - who give long-term nourishment to the city. Edinburgh must continue to be a 'lived-in' city and not just a 'a hall for hire.' The current pandemic has highlighted the consequences of over emphasis on one sector - tourism. The City Plan should seek a broader based approach to development which enhances the sustainability of the local economy to ensure the City can better respond to changing circumstances outwith its control. The loss of certain local retail, commercial and community facilities can have a very detrimental impact on the communities that they are intended to serve. We have seen in the city centre the loss of many businesses that have provided essential services and employment to local residents as many have been converted into tourist-focussed enterprises. If the city centre is to remain a place that people want to live in a sustainable manner it is important that the LDP provides protection against uncontrolled change of use of such local businesses.

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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

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

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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** RRCTMA support this view, however we are concerned that there is no mentions of the residential component to the city centre. Edinburgh is unusual in having so many people living in its centre. Their presence directly contributes to the life of the City centre unlike other cities where the centres are empty once the commuters have returned to their homes in the suburbs. It is vital that all decisions regarding this core area take cognisance of the impact on and for residents, to ensure they enhance rather than detract from daily life in this thriving city centre. We are surprised that there is no mention of the specific policies which apply to the city centre with regard to its status as a World Heritage Site and as a Conservation Area and the responsibilities therein.

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

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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** This appears overly prescriptive and restrictive. As well as food, residents need to be able to access a wide range of shops and services, including pharmacies, hair dressers, podiatrists and post offices. Allowing retail development in areas which are not located within walking distance of suitable local centres will enhance the community that these new businesses are intended to serve.

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

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:   
Name   
Response Type   
On behalf of:

Supporting Info   
Email

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**

There is already an over supply of hotels rooms in the city centre and that situation will worsen given the number that are currently being constructed even before the impact of the current pandemic on hotel room demand. We understand the intent of this policy is to spread the provision of hotels more widely in Edinburgh which would help address the adverse impact of over tourism in the city centre. The need for any additional hotel rooms though should be subject to rigorous challenge in the current environment so that the best use is made of any development space.

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

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

Supporting Info   
Email

Choice 15 G

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

Short Response

Explanation

Choice 16 A1

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

Short Response

Explanation

Choice 16 A2

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

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Supporting Info   
Email

Choice 16 A5

**We want to continue to support office development in other accessible locations elsewhere in the urban area. Do you agree? - 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



Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Supporting Info   
Email

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

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

Supporting Info

Email

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

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

Supporting Info   
Email

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

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

**Customer Ref:**

01402

**Response Ref:**

ANON-KU2U-GPMS-X

**Supporting Info**

**Name**

Michael Birch

**Email**

rrcta@live.co.uk

**Response Type**

Residents Organisation

**On behalf of:**

Regent, Royal, Carlton Terraces and Mews Association

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