

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 agree with this, however it needs to be clear who will maintain these spaces in future. Green spaces should be prioritised with public consultation and subsequent local, public management of these spaces facilitated by CEC. This needs to be backed by sufficient revenue budgets, rather than allowing hard and soft landscaping to deteriorate until capital funding is available to remove, replace or upgrade it. Public spaces should be truly 'public' and not just privately-owned add-ons to private housing developments. There is currently much privately-owned green space in Edinburgh, some of which could be adopted for public use (e.g. Queen Street gardens) as was successfully done in St Andrew's Square. Temporary greening on sites/land which is unlikely to be redeveloped within 3 years should also be similarly prioritised. Many pieces of CEC owned land lie fallow for multiple years and could be utilised by and for the public.

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** Agree. As with the response to 1A above, it needs to be very clear who will maintain any ponds, swales etc. and how this it will be funded. If these are adopted for public use, there need to be sufficient revenue budgets made available. More research is required on the maintenance and life cycle costs of living roofs.

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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** Agree, especially in response to anticipated extreme weather events due to climate change. In addition to requiring water management systems, and avoiding development on flood plains, planners should ensure that natural drainage through soft landscaping is not diminished by stealth through the incremental 'slabbing over' of existing front gardens to provide crossovers to create in-curtilage parking.

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 disagree. The North East Locality Open Space Action Plan (March 2017) demonstrated that 30.3% of homes in the area were not served by the open space standard of all homes being within 400 meters walking distance of a 'good' quality, accessible greenspace of at least 500 m2, and that this compared negatively with the city as whole. Rather than develop over poor-quality or underused open space, priority should be given to funding the improvement and, crucially, the ongoing maintenance of that space (with associated budgets). To allow exceptions when developing public space is not acceptable. CEC could/should introduce a policy where no public space is unused for more than a 12-month period. The concept of discussing what 'circumstances' it is sensible to develop an open space is counter-intuitive. By definition these should be developed and improved and especially so in a high density future for the city. The existence of these sets the criteria. Local community bodies/groups should be given proper responsibility with the authority and necessary resources for the development and upkeep of individual spaces.

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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** Agree, and this is particularly relevant for newly created residential areas on the waterfront such e.g Newhaven and Granton. However, these should be publicly held and maintained. Many of what are considered to be public spaces are in fact privately owned and 'policed', with restrictive rights over usage in place. It needs to be made clear what is truly public space with adequate revenue budgets in place to develop these and maintain to the agreed standards.

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 agree with this and we recognise the benefits that allotments can bring, with regards mental and physical health and well-being, community cohesion and the environment. We believe that further allotment sites need to be identified across the city, and particularly in Leith and north Edinburgh where high-density, tenement housing means that fewer households have access to their own private garden. In more recent flatted developments where communal gardens are provided, these tend to be subject to Deeds of Conditions which are likely to preclude vegetable cultivation or the creation of allotments. Moreover in the waterfront areas of Newhaven and Granton there is currently little or no proposed or existing allotment provision so we would wish to see that added and being part of the mixed use for the new neighbourhoods being developed there as well. We suggest that the current waiting list system for allotments is made more transparent and fairer e.g. with priority given to people in flats and/or with no existing garden space.

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Choice **1 F**

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

Short Response

Explanation

Choice **1 G**

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

Short Response

Explanation

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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**

As per comments above. The preference would be for sizeable new green spaces (i.e. not the shared gardens of new developments) to be adopted and maintained through the public purse (supported by adequate budgets) to ensure open access to all and to avoid the creation of privately maintained open spaces as seen in recently developed areas of London (e.g. Kings Cross). Responsibility for these, including some budgetary responsibility, should be given to local, public groups.

We agree with this, however it needs to be clear who will maintain these spaces in future. Green spaces should be prioritised with public consultation and subsequent local, public management of these spaces facilitated by CEC. This needs to be backed by sufficient revenue budgets, rather than allowing hard and soft landscaping to deteriorate until capital funding is available to remove, replace or upgrade it. Public spaces should be truly 'public' and not just privately-owned add-ons to private housing developments. There is currently much privately-owned green space in Edinburgh, some of which could be adopted for public use (e.g. Queen Street gardens) as was successfully done in St Andrew's Square. Temporary greening on sites/land which is unlikely to be redeveloped within 3 years should also be similarly prioritised. Many pieces of CEC owned land lie fallow for multiple years and could be utilised by and for the public.

it needs to be very clear who will maintain any ponds, swales etc. and how this it will be funded. If these are adopted for public use, there need to be sufficient revenue budgets made available. More research is required on the maintenance and life cycle costs of living roofs.

Local community bodies/groups should be given proper responsibility with the authority and necessary resources for the development and upkeep of individual spaces.

5ha spaces should by publicly held and maintained. Many of what are considered to be public spaces are in fact privately owned and 'policed', with restrictive rights over usage in place. It needs to be made clear what is truly public space with adequate revenue budgets in place to develop these and maintain to the agreed standards.

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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 agree with this, but with some additional suggestions. Increasingly, affordable housing is delivered through Section 75 (S75) agreements. The Council's use of its Affordable Housing Policy to provide tenure-blind, on-site affordable housing across the city is very much welcomed. However, this method of provision is driven by market conditions and subject to boom-bust property cycles, as was apparent in the aftermath of the 2008-9 crash and may be again in a post-Covid 19 recession. The Council therefore needs to ensure a constant supply of affordable land (either public or acquired through CPO powers) and funding for affordable (including HAG for social) housing, in addition to any (essentially windfall) S75 provision. PoLHA's experience of providing S75 affordable housing has shown that the private sector cannot be relied upon to exceed the minimum building standards design requirements without additional carrot or stick incentives, and not all developers are willing to work with their housing association partners to improve or modify their existing designs to make them compliant with "housing for varying needs standards" and more suitable for affordable housing use. Most S75 housing has already been designed out before it is brought to a housing association, resulting in few, if any, S75 developments containing wheelchair-adapted accommodation or other particular-needs housing. Similarly, external areas in S75 developments tend to be unfenced, open-plan, communal spaces which do not lend themselves to children's safe play, clothes drying or the formation of vegetable plots or allotments. This is compounded by the fact that the Edinburgh Design Guidance (EDG) is inconsistently applied, resulting in some developers offering up dwellings for affordable housing use which do not even meet the minimum floor areas for general needs housing within the Guidance and are certainly not suitable for wheelchair accessible housing (where an additional 11% to 15% internal floor area per unit is required). The EDG document itself is in need of further modification, a point which housing associations have argued on several occasions within the Edinburgh Development Directors Forum. An example of this is that section 2.11 of the Guidance only requires a minimum floor area of 66m<sup>2</sup> for a two-bedroom flat and, as a consequence, this is generally the maximum that is offered by developers within their affordable housing dwellings. Although these are still lettable to three person households, PoLHA, in common with other affordable housing providers, has a greater need for four person dwellings, which offer greater flexibility in housing a range of household types. However, to meet Housing for Varying Needs and PoLHA's own Design Guide, these need to be approximately 10m<sup>2</sup> larger than the 66m<sup>2</sup> minimum standard in the Guidance. This should be reflected clearly within the Guidance, in addition to separate minimum sizes for wheelchair-adapted housing. If the requirement for a study space within Aspect Silver Level 6 of the Building Standards is to be applied as a minimum (see comment within Choice 3A below) this too will need to be reflected within the minimum floor areas within the EDG. In summary, the Council needs to ensure that the market (through S75 agreements) does not become the main driver of affordable housing provision, and that housing associations are enabled (through free/subsidised land and grant funding) to undertake their own developments. In addition, the design process on S75 developments needs to be further refined to ensure that affordable housing providers (and CEC's Housing Investment Team) are fully engaged with developers at the initial design stage so that any requirements (e.g. for accessible or particular needs

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housing) are incorporated into the design at a far earlier stage in the design process. We would also like to see a revision of the EDG to ensure its relevance to the needs of affordable housing and to see it more consistently applied across all tenures, and with minimum floor areas upgraded from 'guidance' to 'requirements'. And finally, to maintain standards across the board, we would also recommend that the Housing for Varying Needs document is updated and extended to apply across all housing providers.

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** Agree, but with some reservations. Leith is already densely populated, with the 2011 Census demonstrating that the Leith Walk area has the highest population density in Scotland, equating to 12,900 persons per square kilometer (129 persons per hectare). Although maintaining a high density is desirable in terms of sustaining public transport and commercial activity and reducing suburban sprawl, it inevitably puts pressure on infrastructure and services. In practice, PoLHA's new build developments have tended to be in the region of 150-250 dwellings per hectare and would not be adversely affected by a 65 or 100 minimum. One notable exception was the highly popular and successful colony development at Leith Fort (49 dwellings per ha) which would not have been possible with these standards in place, without compromising the desirable amount of common open space. The proposed 65 and 100 minimum thresholds are therefore unlikely to have a significant effect on PoLHA, but may prevent another colony development like Fort which would be very unfortunate. We believe however that it would be preferable to base any density standards on the number of bedspaces per hectare rather than dwellings. In common with other affordable housing providers, PoLHA tends to allocate its properties to full or near-full capacity, so as to make maximum use of a scarce resource to meet demand. Consequently an affordable housing development with 100 dwellings per hectare in Leith is likely to house considerably more adults and children than an area with an equivalent density in, say, Marchmont, where both the privately owned flats and the private-rented student housing is likely to be under-occupied in the sense that fewer double-sized bedrooms will be occupied by two people. This needs to be taken into account when considering infrastructure provision and open space requirements.

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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 agree with this and we welcome the Council's support of active travel. Cycle routes should be designed in full consultation with cycling lobby groups such as Sustrans and Spokes, especially where they follow, or cross over, the route of busy roads or the tram route. Any cycle/pedestrian routes should be designed to Secure by Design Standards and be adopted for public use supported by adequate revenue budgets, to ensure that they are well lit and maintained. Cycle and pedestrian routes require constant management to ensure that they are still fit for purpose, not obstructed by parked vehicles, wheelie bins, utility company infrastructure, street signage etc. and that any pot holes, damaged slabs or broken glass are dealt with. In new housing developments, there should be a requirement to provide a number of cycle parking bays on the street (rather than all being enclosed within the development) to cater for short-term visitors. Cycle/pedestrian routes on the perimeters of the city should connect into neighbouring local authority routes e.g. the South Queensferry to Portobello route should be linked into East Lothian Council's Musselburgh to Dunbar coastal route.

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 agree with this, and particularly that student housing should contribute towards the public realm. However there needs to be a clear distinction between 'public' open space and semi-private space, particularly on flatted developments where residents require a safe enclosed space for their children to play and for clothes drying. The current tendency to provide all the outside space on new developments as open access, has resulted in a loss of safe enclosed areas for the residents of affordable housing on S75 developments, with the expectation that residents will use tumble dryers and their children will play in open-plan unenclosed spaces. Although this is ultimately a matter of choice, households on lower incomes should not be expected to bear the upfront and running costs of a tumble dryer. Semi-private drying greens are part of the Scottish housing vernacular and should be encouraged, given the environmental benefits, the relatively dry and windy climate in Edinburgh and the motivation to reduce mould growth and respiratory illnesses in increasingly sealed and air-tight housing.



Customer Ref: 00662      Response Ref: ANON-KU2U-GPQC-J  
Name: Heather Kiteley  
Response Type: Registered Social Landlord  
On behalf of: Port of Leith Housing Association

Supporting Info:   
Email: heather.kiteley@polha.co.uk

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: Platinum (zero car)

**Explanation** Agree with Platinum but with reservations. As all buildings will inevitably be required to be carbon neutral in the long run, trial and investment now is likely to generate a saving later in monetary and environmental terms. We would also welcome the requirement for volume house-builders to innovate, thus increasing demand for new technology, bringing down costs and making zero carbon a reality. However, we believe that additional work is needed here to assess the potential capital cost of implementing each of individual aspect within each level. To be eligible for the additional 'greener' HAG funding, housing associations are currently required to provide Aspects 1 and 2 of the Silver level (carbon dioxide emissions and energy for space heating). For housing associations working on a non-profit basis where viability is difficult to achieve as it is, the risk of a blanket increase in standards is that any additional costs without extra funding will result in cost cutting elsewhere in the development, for example in areas which are not covered by planning or building standards (e.g. the quality of internal components, materials, fixtures and fittings). So, although the quality may be increased in some aspects, in other respects this will reduce. Alternatively, additional capital costs will simply result in extra subsidy being required from the Association's own reserves (reducing its ability to develop in future) or indeed, higher rents (which are in turn limited by affordability) and therefore a greater reliance on Universal Credit/Housing Benefit and/or higher arrears. Having said that, PolHA, in principle, supports the inclusion of all of the additional aspects (subject to costs and availability of funding) with the following comments: Aspect Silver and Gold Level 4 (requirement for water butts for all dwelling with private gardens). We would request that some discretion is applied here, for example in small patios or paved areas where space is restricted and there are is no (or limited) soft landscaping. Could the water butt be provided within a communal garden where this is provided in addition to the private patio? Aspect Silver and Gold Level 6 (home office area). The current lockdown due to the Covid-19 pandemic has shown that this is now more relevant than ever and more of a necessity than a "nice to have". Some consideration needs to be made as to how this space would be used in future, with less scrupulous landlords potentially regarding it as an additional revenue-generating bed space, even where it falls short of the minimum floor area for a bedroom/apartment. In practice if the home-office was in a separate room which did meet the apartment size, would a housing association 'under-allocate' to that property so that it could be used as an office and only charge the rent of the smaller unit or would it levy the rent as if it were a bedroom and expect tenants to 'under-occupy' and pay for the privilege. And what would the implications of this be for the Bedroom Tax? All of this would need to be worked out in detail. It may be more straightforward therefore to provide this space within the hallway or an existing public room. As stated in the response to Choice 2A above, the minimum floor areas within the Edinburgh Design Guidance would need to be increased to accommodate this. Aspect Gold Level 6 (mobility space for prams and electric wheelchairs). This is to be welcomed for future-proofing, and certainly electric wheelchair space is something we are trying to address retrospectively on all of our developments. We would suggest however that this could be provided outside, rather than within, the dwelling.

If the requirement for a study space within Aspect Silver Level 6 of the Building Standards is to be applied as a minimum this too will need to be reflected

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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

**Explanation** Agree. Public consultation in the past has been sporadic and not included all members of the community. For example, evening meetings preclude those with small children or other caring responsibilities. Place plans MUST involve those members of the community who have a vested interest in the place being created, not just those with the confidence, knowledge and skills to contribute in a public forum. Tangible outcomes must also be achieved. Feedback from co-commissioning groups and similar over the last number of years has consistently been that no or on occasion very marginal “token” changes/improvements have resulted from consultation. Genuine decision-making authority must be given to the community itself to make this truly collaborative.

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** Agree, however what are the plans to find out what the ‘community ambitions’ are? Will these encompass the consultation already carried out through the Local Outcome Improvement Plan and during the most recent Leith Community Conference? Historically there have been consultations and co-commissioning carried out multiple times and asking similar or identical questions with no tangible outcomes. This leads to disillusionment among participants and a lack of engagement from the wider community.

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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** Agree. Options one and two, if progressed will require significant community infrastructure to be developed alongside these; travel, childcare, health services, support services etc. Additionally, housing developments which incorporate 100% affordable housing, or specifically social housing, should be exempt from paying infrastructure levies (for education etc.) As with the current HAG rates these developments are not financially viable on their own and rely on cross-subsidy from Housing Associations' valuable and time-limited reserves.

We believe however that it would be preferable to base any density standards on the number of bedspaces per hectare rather than dwellings. In common with other affordable housing providers, PolHA tends to allocate its properties to full or near-full capacity, so as to make maximum use of a scarce resource to meet demand. Consequently an affordable housing development with 100 dwellings per hectare in Leith is likely to house considerably more adults and children than an area with an equivalent density in, say, Marchmont, where both the privately owned flats and the private-rented student housing is likely to be under-occupied in the sense that fewer double-sized bedrooms will be occupied by two people. This needs to be taken into account when considering infrastructure provision.

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** Yes we agree, however CEC must ensure that the process of decision making regarding need is carried out with proper opportunity for all members of the community to contribute. This may mean making significant changes to the consultation process and moving CEC from its comfort zone of arranging co-commissioning meetings which tend to be attended by the more able and confident members of the community only. Innovative planning should ensure that inclusion is all-encompassing otherwise there is a possibility that CEC will do this for the community not with the community.

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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 Yes, we agree with this although have concerns that imposing additional levies on non-profit affordable housing providers will make affordable housing even less viable. We would argue therefore that affordable housing developments led by housing associations (as opposed to S75 affordable housing) should be exempt from contributions as in effect they are already providing 100% community infrastructure in the form of affordable housing.

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 Yes, we agree but with the same point as above, i.e. that affordable housing developments led by housing associations (as opposed to S75 affordable housing) should be exempt from contributions as in effect they are already providing 100% community infrastructure in the form of affordable housing.

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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

Explanation Yes, we agree but with the same point as above, i.e. that affordable housing developments led by housing associations (as opposed to S75 affordable housing) should be exempt from contributions as in effect they are already providing 100% community infrastructure in the form of affordable housing.

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 Yes, we agree with this. Although car ownership tends to be lower than average among POLHA's tenants, we need to consider however that a number of our upcoming developments will be located in Granton where the current public transport infrastructure is limited.

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 Yes, agree. The place principle should be at the centre of public transportation interventions with an emphasis on this, alongside wider qualities of good places; safe, engaging public spaces, easily accessible and well-maintained areas for meeting and recreation, ready access to shops and socialising etc.

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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** Agree. Much as we support the reduction in car use, it is important that Edinburgh in general and Leith in particular are not seen as places where it's impossible to drive or park. Leith in particular relies on a good combination of sole traders, primarily SMEs and a few larger businesses. It is vital that this plan supports the smaller businesses which are most vulnerable to change. Aberdeen is an example of a city which monetised and limited parking to the point of making it almost impossible for drivers to access services and facilities in the city, leading to reduced footfall for businesses. A careful balance must be struck between ensuring we have a safe, clean city and one which is attractive to visitors from near and far alike.

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** Agree but with the caveat of the comments on 7A. Much as we support the reduction in car use, it is important that Edinburgh in general and Leith in particular are not seen as places where it's impossible to drive or park. Leith in particular relies on a good combination of sole traders, primarily SMEs and a few larger businesses. It is vital that this plan supports the smaller businesses which are most vulnerable to change. Aberdeen is an example of a city which monetised and limited parking to the point of making it almost impossible for drivers to access services and facilities in the city, leading to reduced footfall for businesses. A careful balance must be struck between ensuring we have a safe, clean city and one which is attractive to visitors from near and far alike.

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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

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

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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** Agree. Tenant feedback has strongly suggested that green spaces and cycle/walking access to and from these as well as to other areas of the city and beyond are important for the people of Leith. These would also benefit staff commuting to the Association's offices from other parts of the city and beyond.

Cycle routes should be designed in full consultation with cycling lobby groups such as Sustrans and Spokes, especially where they follow, or cross over, the route of busy roads or the tram route. Any cycle/pedestrian routes should be designed to Secure by Design Standards and be adopted for public use supported by adequate revenue budgets, to ensure that they are well lit and maintained. Cycle and pedestrian routes require constant management to ensure that they are still fit for purpose, not obstructed by parked vehicles, wheelie bins, utility company infrastructure, street signage etc. and that any pot holes, damaged slabs or broken glass are dealt with.

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** We agree with all of the above (8B).



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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

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: 00662 Response Ref: ANON-KU2U-GPQC-J

Supporting Info

Name Heather Kiteley

Email heather.kiteley@polha.co.uk

Response Type Registered Social Landlord

On behalf of: Port of Leith Housing Association

Choice 9 A

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

Short Response Yes

**Explanation** We agree with this. Short term lets are a regular feature of concerns raised by Leith residents. While not intrinsically a bad thing for a city to have, these must be controlled and regulated to remove or reduce the 'buy-to-let' culture which is prevalent in Edinburgh, prevent the loss of permanent housing available for owner-occupation or long-term rental and thereby reduce pressure on house prices and private rents. We would add that resources need to be made available to manage and police the short term let control area otherwise it runs the risk of being ignored. We suggest that this could be funded from a per-night levy imposed on the short-term lets.

During the coronavirus lockdown, the empty streets and lack of essential food shops remaining open for business in the Old and New Towns has provided stark evidence of the depopulation of these areas. This can be attributed to house price inflation, the lack of affordable housing and the disproportionate number of Airbnb flats in the centre of town. Empty sites in the centre of town should be prioritised for affordable rather than private housing (which runs the risk of being used as second homes and short term lets) to bring life back into the city centre and reinvigorate the smaller retail sector

We would also add that measures should be taken to ensure that the city's existing housing stock is kept affordable to households on lower income levels. This includes controlling short-term lets to increase the supply of housing for owner-occupation and long-term private rental, thereby reducing pressure on house prices and private rents

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

Supporting Info   
Email

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**

We agree with this for the reasons stated in 9A above: Short term lets are a regular feature of concerns raised by Leith residents. While not intrinsically a bad thing for a city to have, these must be controlled and regulated to remove or reduce the 'buy-to-let' culture which is prevalent in Edinburgh, prevent the loss of permanent housing available for owner-occupation or long-term rental and thereby reduce pressure on house prices and private rents. We would add that resources need to be made available to manage and police the short term let control area otherwise it runs the risk of being ignored. We suggest that this could be funded from a per-night levy imposed on the short-term lets.

During the coronavirus lockdown, the empty streets and lack of essential food shops remaining open for business in the Old and New Towns has provided stark evidence of the depopulation of these areas. This can be attributed to house price inflation, the lack of affordable housing and the disproportionate number of Airbnb flats in the centre of town. Empty sites in the centre of town should be prioritised for affordable rather than private housing (which runs the risk of being used as second homes and short term lets) to bring life back into the city centre and reinvigorate the smaller retail sector

We would also add that measures should be taken to ensure that the city's existing housing stock is kept affordable to households on lower income levels. This includes controlling short-term lets to increase the supply of housing for owner-occupation and long-term private rental, thereby reducing pressure on house prices and private rents

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

Supporting Info   
Email

Choice **10 A**

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

Short Response

**Explanation** We agree with the recommendations but also suggest that more work needs to be carried out to assess the ongoing need for student housing in the city, given, in particular, the potential impact of Brexit and the coronavirus pandemic on university admissions. We would also suggest that the design of student housing is such that it can be repurposed into amenity, sheltered or general needs housing in future without the need for demolition (for example by grouping rooms and services to enable conversion to self-contained accommodation). The Association welcomes the opportunity to provide general needs affordable housing as part of the mix on student developments and also the proposal in Choice 11 below that the current ratio of 25% affordable housing on the 50% of the site area be increased to 35%. We also agree that the number of studio flats should be limited to 10% and that the design of these should be such that they can be adapted in future.

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** We welcome the proposal. We would also reiterate the need (as detailed in our response to Choice 2A above) to ensure that the design of any affordable housing on these sites is carried out in full partnership with the proposed affordable housing provider, and that the Edinburgh Design Guidance and Housing for Varying Needs documents are revised and applied consistently across all tenures.

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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**

Customer Ref: 00662      Response Ref: ANON-KU2U-GPQC-J  
Name: Heather Kiteley  
Response Type: Registered Social Landlord  
On behalf of: Port of Leith Housing Association

Supporting Info:   
Email: heather.kiteley@polha.co.uk

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: Yes

**Explanation**  
Yes we agree. We welcome the proposal and would also suggest that requirements are set for social housing within this 35%, to ensure that the additional housing generated through S75 is truly affordable for people in greatest need. We have concerns for example that the recent increase in Local Housing Allowance (LHA) rates will result in mid-market rent housing becoming less affordable to the (around the median income households) client group for which it was originally intended and drifting closer to private rental. We would also propose that more explicit guidance is provided to developers on the maximum amount that affordable housing providers can pay for these units. Without this, there is a risk that the cost of this additional developer levy will fall upon housing associations themselves, who will be obliged to make up the shortfall between the price paid to the developer, the grant funding and the amount that can be raised through rents. Alongside this, the benchmark grant level for social housing needs to be reviewed. Without these measures in place it will not be possible for housing associations to provide 50% of social housing on affordable housing sites, let alone the current target of 70%. Given that in boom periods (bearing in mind that all S75 housing is market-led and essentially windfall) an increasing percentage of the city's new affordable housing stock will be generated by developers, it is crucial that greater emphasis is put on design. We would reiterate the need to ensure that the design of any affordable housing on these sites is carried out in full partnership with the proposed affordable housing provider, and that the Edinburgh Design Guidance and Housing for Varying Needs documents are revised and applied consistently across all tenures. Alongside the proposal to extend S75 requirements, measures need to be put in place to ensure a constant supply of affordable housing during downturns in the market when speculative developers and volume housebuilders cannot be relied upon to bring forward new sites. We would also add that measures should be taken to ensure that the city's existing housing stock is kept affordable to households on lower income levels. This includes controlling short-term lets to increase the supply of housing for owner-occupation and long-term private rental, thereby reducing pressure on house prices and private rents. A suggestion would be to declare a city-wide Rent Pressure Zone to ensure that private rents are not allowed to spiral upwards in response to market pressure.

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

Supporting Info   
Email

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**

We agree with this but again would reiterate the need for early involvement of affordable housing providers in the design of affordable housing on S75 sites, and the need for a revision and reinforcing of the Edinburgh Design Guidance to ensure that this guidance (in particular floor areas) is fit for purpose. We would also question why Housing for Varying Needs should only apply to social housing. If the Council wants to ensure that standards are raised across all tenures then this guidance should be a requirement for all housing within the city. The Council should also consider the option on certain sites of taking the 35% requirement as serviced land rather than completed dwellings, for development by housing associations. This may not provide the economies of scale or tenure blind approach that would be achievable through taking a block on a larger development, but it would allow the Council and housing associations to develop the site to meet actual need. This could involve for example developing more family housing, or more specialised dwellings for particular needs, rather than merely mirroring the mix on the adjacent development. We would also recommend that the Council fulfils its responsibilities as the strategic housing authority for the city by undertaking a revised Housing Need and Demand Assessment so that current and future need can be quantified. This is a necessary pre-requisite to accurate planning.

Increasingly, affordable housing is delivered through Section 75 (S75) agreements. The Council's use of its Affordable Housing Policy to provide tenure-blind, on-site affordable housing across the city is very much welcomed. However, this method of provision is driven by market conditions and subject to boom-bust property cycles, as was apparent in the aftermath of the 2008-9 crash and may be again in a post-Covid 19 recession. The Council therefore needs to ensure a constant supply of affordable land (either public or acquired through CPO powers) and funding for affordable (including HAG for social) housing, in addition to any (essentially windfall) S75 provision.

PolHA's experience of providing S75 affordable housing has shown that the private sector cannot be relied upon to exceed the minimum building standards design requirements without additional carrot or stick incentives, and not all developers are willing to work with their housing association partners to improve or modify their existing designs to make them compliant with "housing for varying needs standards" and more suitable for affordable housing use. Most S75 housing has already been designed out before it is brought to a housing association, resulting in few, if any, S75 developments containing wheelchair-adapted accommodation or other particular-needs housing. Similarly, external areas in S75 developments tend to be unfenced, open-plan, communal spaces which do not lend themselves to children's safe play, clothes drying or the formation of vegetable plots or allotments.

This is compounded by the fact that the Edinburgh Design Guidance (EDG) is inconsistently applied, resulting in some developers offering up dwellings for affordable housing use which do not even meet the minimum floor areas for general needs housing within the Guidance and are certainly not suitable for

Customer Ref: 00662      Response Ref: ANON-KU2U-GPQC-J

Name: Heather Kiteley

Response Type: Registered Social Landlord

On behalf of: Port of Leith Housing Association

Supporting Info: [ ]

Email: heather.kiteley@polha.co.uk

wheelchair accessible housing (where an additional 11% to 15% internal floor area per unit is required). The EDG document itself is in need of further modification, a point which housing associations have argued on several occasions within the Edinburgh Development Directors Forum. An example of this is that section 2.11 of the Guidance only requires a minimum floor area of 66m<sup>2</sup> for a two-bedroom flat and, as a consequence, this is generally the maximum that is offered by developers within their affordable housing dwellings. Although these are still lettable to three person households, PoLHA, in common with other affordable housing providers, has a greater need for four person dwellings, which offer greater flexibility in housing a range of household types. However, to meet Housing for Varying Needs and PoLHA's own Design Guide, these need to be approximately 10m<sup>2</sup> larger than the 66m<sup>2</sup> minimum standard in the Guidance. This should be reflected clearly within the Guidance, in addition to separate minimum sizes for wheelchair-adapted housing. If the requirement for a study space within Aspect Silver Level 6 of the Building Standards is to be applied as a minimum this too will need to be reflected within the minimum floor areas within the EDG.

Choice      12   A

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

Short Response      Option 1 (Council/

**Explanation**

We support Option 1 (Urban Area Option with the potential use of CPO powers) and believe that existing brownfield development sites, for example, in Leith and North Edinburgh should be prioritised over greenfield development, supported by the development of infrastructure within these areas and the completion of the tram loop via Granton. This will not only improve the quality of life of existing communities within these areas but will maintain the high-density that characterises Edinburgh as a city, encourage active travel, and reduced reliance on the car. We would also recommend that the Council fulfils its responsibilities as the strategic housing authority for the city by undertaking a revised Housing Need and Demand Assessment so that current and future need can be quantified. This is a necessary pre-requisite to accurate planning.

More affordable residential accommodation should be provided within the city centre. This would have the effect of increasing demand for smaller retail (small food shops etc) within central areas and we believe that this should be supported by lower commercial rents for smaller, independent shops. The provision of affordable housing in the city centre would counter-balance the growth of short term lets by creating permanent communities which are able to support local shops and services. During the coronavirus lockdown, the empty streets and lack of essential food shops remaining open for business in the Old and New Towns has provided stark evidence of the depopulation of these areas. This can be attributed to house price inflation, the lack of affordable housing and the disproportionate number of Airbnb flats in the centre of town. Empty sites in the centre of town should be prioritised for affordable rather than private housing (which runs the risk of being used as second homes and short term lets) to bring life back into the city centre and reinvigorate the smaller retail sector. Similarly, S75 opportunities in these areas should be used to provide on-site affordable housing.



Customer Ref:

00662

Response Ref:

ANON-KU2U-GPQC-J

Supporting Info

Name

Heather Kiteley

Email

heather.kiteley@polha.co.uk

Response Type

Registered Social Landlord

On behalf of:

Port of Leith Housing Association

Choice 12 B1

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

Short Response

Not Answered

Explanation

Choice 12 B2

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

Short Response

Not Answered

Explanation

Choice 12 B3

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

Short Response

Not Answered

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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 C**

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

Short Response

Explanation

Choice **12 D**

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

Short Response

Explanation

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

Supporting Info   
Email

Choice 13 A

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

Short Response

Explanation Agree. Policies which supports the development of not for profit and social enterprise companies in Edinburgh are particularly supported. Business support in the form of fiscal loans and grants coming directly from CEC and provided alongside existing loans and grants would go a long way to ensuring any policy has tangible and long-term benefits. Social enterprise is a business model which Edinburgh can utilise to develop and thrive in a wide range of business and service areas, supporting this financially, particularly at the set-up point would reap large, long-term benefits for the whole city.

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 have no opinion on this.

Customer Ref: 00662      Response Ref: ANON-KU2U-GPQC-J  
Name: Heather Kiteley  
Response Type: Registered Social Landlord  
On behalf of: Port of Leith Housing Association

Supporting Info:   
Email: heather.kiteley@polha.co.uk

Choice 14 B

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

Short Response:

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:   
Name   
Response Type   
On behalf of:

Supporting Info   
Email

Choice 15 A

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

Short Response

**Explanation** We agree, but also feel that more affordable residential accommodation should be provided within the city centre. This would have the effect of increasing demand for smaller retail (small food shops etc) within central areas and we believe that this should be supported by lower commercial rents for smaller, independent shops. The provision of affordable housing in the city centre would counter-balance the growth of short term lets by creating permanent communities which are able to support local shops and services. During the coronavirus lockdown, the empty streets and lack of essential food shops remaining open for business in the Old and New Towns has provided stark evidence of the depopulation of these areas. This can be attributed to house price inflation, the lack of affordable housing and the disproportionate number of Airbnb flats in the centre of town. Empty sites in the centre of town should be prioritised for affordable rather than private housing (which runs the risk of being used as second homes and short term lets) to bring life back into the city centre and reinvigorate the smaller retail sector. Similarly, S75 opportunities in these areas should be used to provide on-site affordable housing.

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** Agree. The place principle must again be at the forefront of planning and decision making here. There may be occasions where a commercial needs study does not provide information on the non-commercial benefits of a retail or leisure development within a community e.g. does this unit enhance choices, quality of life, opportunity for social interaction/community cohesion etc.



Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 15 C

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

Short Response

Explanation

Choice 15 D

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

Short Response

Explanation

Choice 15 E

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

Short Response

Explanation

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

Supporting Info   
Email

Choice 15 G

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

Short Response

**Explanation** We agree, but also feel that more affordable residential accommodation should be provided within the city centre. This would have the effect of increasing demand for smaller retail (small food shops etc) within central areas and we believe that this should be supported by lower commercial rents for smaller, independent shops. The provision of affordable housing in the city centre would counter-balance the growth of short term lets by creating permanent communities which are able to support local shops and services. During the coronavirus lockdown, the empty streets and lack of essential food shops remaining open for business in the Old and New Towns has provided stark evidence of the depopulation of these areas. This can be attributed to house price inflation, the lack of affordable housing and the disproportionate number of Airbnb flats in the centre of town. Empty sites in the centre of town should be prioritised for affordable rather than private housing (which runs the risk of being used as second homes and short term lets) to bring life back into the city centre and reinvigorate the smaller retail sector. Similarly, S75 opportunities in these areas should be used to provide on-site affordable housing.

Choice 16 A1

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

Short Response

**Explanation**

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 16 A5

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

Short Response

Explanation

Choice 16 A5

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

Short Response

Explanation

Choice 16 B

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

Short Response

Explanation

Customer Ref: 00662      Response Ref: ANON-KU2U-GPQC-J  
Name: Heather Kiteley  
Response Type: Registered Social Landlord  
On behalf of: Port of Leith Housing Association

Supporting Info:   
Email: heather.kiteley@polha.co.uk

Choice 16 C

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

Short Response: I support a loss of

Explanation: We support a loss of office policy city-wide, and we welcome the mix of small-scale office and commercial, cultural, and residential space which gives Leith its unique character. However we have concerns that extending a broad-brush 'loss of office policy' to Leith could reduce the opportunities for providing affordable housing on brown-field sites which currently have office use, or for amending an existing planning consent to convert office space to residential. We believe that where office accommodation was required historically as a planning condition but where it can now be evidenced that there is no need or demand for this, then there should be the option to convert this to an alternative use where there is proven need. An example of a proven need would be affordable housing which is needed in all parts of the city.

Choice 16 E1

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

Short Response: Not Answered

Explanation:

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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



Customer Ref: 00662      Response Ref: ANON-KU2U-GPQC-J  
Name: Heather Kiteley  
Response Type: Registered Social Landlord  
On behalf of: Port of Leith Housing Association

Supporting Info:   
Email: heather.kiteley@polha.co.uk

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: Not Answered

Explanation: No opinion on this.

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: Not Answered

Explanation: No opinion on this.